

Golden Gate National Recreation Area

DRAFT PLAN/ENVIRONMENTAL IMPACT STATEMENT
FOR DOG MANAGEMENT



**ALL COMMENTS SUBMITTED DURING
PUBLIC REVIEW AND COMMENT PERIOD**

January 14, 2011 through May 30, 2011

Correspondence ID: 1 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The problem is a significant percentage of dog owners have been behaving badly. There are current rules of lease use in the parking lots and picnic areas, no dogs in the bathrooms or the outdoor shower as stated in the superintendents compendium. The restricted area at Ocean Beach for the snowy plover. All being ignored and from what I have seen, no enforcement either. Poop not being picked up, to running dogs knocking over people. Peeing on personal property. And dogs that are obviously out of control of there master by voice command. Chasing and killing wildlife and digging wholes allover.

That east beach at Crissy Field is disgusting, the parking lot, picnic areas smell there is poop all over and many dog owners are using the shower as a dog grooming station, very unsanitary. The whole area is being used as a dog bathroom.

I am in favor of implimenting all aspects of the new dog managment plan.

I would like to see enforcement of existing rules until the new rules take effect.

Correspondence ID: 2 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 09:33:39

Correspondence Type: Web Form

Correspondence: I am a frequent user of the Crissy Field East Beach area, near the north end of the main Crissy parking lot by the concrete bathroom building and the windsock. I am fully in agreement with the Plan's recommendation that this area be made a no-dog area. While I love dogs, the dog owners who use the East Beach do not respect the current leash rules and often let their dogs crap on the beach and the lawn, creating a hazard for everyone else. Please register another SF native and 40-year resident in support of this plan. Thank you!

Correspondence ID: 3 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please do not limit or diminish the off leash areas at Crissy Field. I walk my dog with my 2 year old almost everyday of the week and that beach and the

freedom to have such a large area off leash has been a huge part of my life for all the 22 years I have lived in San Francisco. The off leash area specifically was a deciding factor to not take a position in Chicago last year. Our family would have had a huge house and great public schools and lived a few blocks from Lake Michigan but there are no off leash beaches anywhere around there....My wife and I chose to stay here in no small part because of crissy field and the off leash freedom we enjoy everyday. Alternative C does is not large to be viable for all the dogs that use Crissy Field. Too small a space will crowd dogs and dogwalkers and exacerbate whatever problems the GGRNA is trying to solve. Much of the year the tide is too high to use the beach and will further reduce the space which all dogs will be forced to use. Whenever Family is visiting I am proud to show off the best off leash park in America and they are all amazed at how well behaved and the dogs and their owners are. Please leave the off leash areas as they have been for the last few years; they are a large part of what I love about San francisco.

Correspondence ID: 4 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 10:18:30
Correspondence Type: Web Form
Correspondence: As a regular use of both Crissy and OB I fully support the plan. I love dogs but things are out of hand at Crissy in particular. Last time I was their an off leash dog ran right over/through my water sports equipment - the owner was an idiot and claimed it was my fault for " being there ". Minutes later another off leash dog came over an peed all over it. The owner pretended not to notice, and when I asked him to clean it up he said " dogs are dogs " and told me to get lost. Good riddance to these people. Now the kids won't have to play in dog shit anymore.

Correspondence ID: 5 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 10:44:50
Correspondence Type: Web Form
Correspondence: Regarding proposal for Crissy Field: Small dogs like mine (<20 lbs miniature poodle) are not safe playing in the surf on the main beach. Having access to the tidal area for ball chasing and fetch is critical to teaching them to swim in a safe environment. The joy my dog gets from romping in the water(and the stress relief I get from watching him) is immeasurable and there is really no other place for him to do that, assuming I obey the laws. So for this area (again the tidal area) I would respectfully request this be changed from leash only to "voice control" or be off limits only to large dogs who are safer playing in the surf, maybe allowing access only to dogs <20lbs who are less likely to have an impact on children and families in the

area. Otherwise the proposal at Crissy Field makes sense. I will add that leashes have been required on the trails at all times and those are not enforced. As the owner of a small dog, I don't appreciate it when big dogs are allowed to roam free. So I would ask that laws be enforced otherwise the only people who suffer are the people and dogs who actually obey the law.

Lastly, please consider stricter regulation, licensing and fees for dog walkers vs. single or 2 dog owners. I was unemployed for six months this year and visited nearly all of these sites with my dog so I have seen first hand that dog walkers are often careless, rude and overwhelmed. Dog walkers need to pay for a license that covers the damage they do to the parks when they bring 6-10 dogs at a time to an area. It's dogs that are not well managed that cause problems, and There's a BIG difference in environmental impact of 5 dogs + 5 owners vs 5 dogs and 1 dog walker. One idea might be that during the weeks, when dog walkers are more active the rules are different than on weekends when owners are more likely to be out.

Thank you for your consideration.

Correspondence ID: 6 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 11:16:10
Correspondence Type: Web Form
Correspondence: Please leavethe Presidio and Funston open to off-leash dogs. If you don't, you will simply make the neighborhood parks more crowded with dogs/their walkers. Further, our family loves to "hike" with our toddlers and our 12-pound dog in the Presidio

San Francisco's warm and progressive approach to dogs is one of reasons its such a great city

Correspondence ID: 7 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 11:30:07
Correspondence Type: Web Form
Correspondence: Please, please, please do not implement this plan. My golden retriever and I run along ocean beach and thru Fort Funston daily. By inacting this plan, you'll take away the joy so many San Franciscan's enjoy. The dogs learn social skills and are able to interact much easier off leash. On leash, dogs become protective, often leading to altercations; the best way to avoid this is to keep the parks the way they've always been. Please, we are pleading with you, sincerely, karin sunden

Correspondence 8 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,14,2011 11:39:06

Correspondence Type: Web Form

Correspondence: After year of having dog run wild at Crissy like they own it I think this plan is great. I understand the needs for dog to run free but having them stay on leash until after the marsh is a great plan to keep use for all beach goers equal.

I am at Crissy with my family weekly and I go all most daily to Kitesurf, windsurf or stand up paddle surf. I have been doing this there for almost 21 years.

I love dogs but have had them piss everything from my kiting, kid and lunch because the owner is not in control of them. The worst thing that has happen is when a dog chased my then 3 year old into the Bay and the owner said that it was my son's fault.

Correspondence ID: 9 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,14,2011 11:49:02

Correspondence Type: Web Form

Correspondence: I am extremely disappointed by the recommendation for Chrissy field, Fort Funston and the Presidio. As a responsible dog walker it is absolutely vital for my dog's health to continue to enjoy off leash dog walking in the entire Chrissy Field Area. Further, if the NPS kicks the commercial dog walkers out of the Presidio and Fort Funston they will all need somewhere to go. Neighborhood parks managed by the City will be flooded with dog walkers and that will most likely lead to increased crowding and degradation of these parks. By restricting off leash walking in the GGNRA they may inadvertently destroy my neighborhood park. I would like to see a full analysis of the downstream consequences of this decision.

There are over 100,000 dogs in San Francisco and they need somewhere to go. Fort Funston and the Presidio are wonderful places for dogs to run off leash. This is one reason San Francisco is beautiful and unique, frankly this is why I live in the city. Not only will you destroy quality of life for residents you will also be destroying property values as residents my move out.

Correspondence ID: 10 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,14,2011 12:03:57

Correspondence Type: Web Form

Type:

Correspondence: Having so many off leash areas is hugely important to me as a San Francisco resident. It is part of what makes this city so attractive to my husband and I. Our dog is very important to us, as I know they are to other residents as well. The importance of the ability to run our dogs off leash cannot be understated. I always feel so bad for dogs in other cities where they don't have the opportunity to run off leash. I also understand the necessity of protecting wildlife and habitat, but there must be a balance. Not to mention that if we severely curtail where dog walkers can go in the parks, they will flood the city, which is likely to have negative unintended consequences. It is incredibly sad to me that so many of these options entail no dogs at all. We are a city that loves our dogs, and to restrict even further the parks we can go with our dogs would be a travesty. To that end, the following are my comments on some of the various areas under review.

Stinson Beach: Alt A.

Homestead Valley: Alt A.

Alta Trail, etc: Alt A.

Oakwood Valley: Alt A - I regularly use this area and it is a wonderful place to take my dog on an off leash run. I would be fine with fencing to protect habitat, but only if the whole area (Oakwood Valley Fire Road and Oakwood Valley Trail) remain off lease.

Muir Beach: Alt A.

Rodea Beach: Alt A or Alt C

Marin Headlands: Alt A, please please please not "No dogs."

Fort Baker: Alt A or Alt C.

Fort Mason: Alt C - It would be great if some portions were designated for restricted off-leash use.

Crissy Field Wildlife Protection Area: Alt B - protect this sensitive area, while leaving the rest of the Crissy Field area off leash, voice control.

Crissy Field: Alt A. Off lease use here (voice control), especially on the beaches, is hugely important to me. Please do not take this away. I use the Crissy field beach with my dog all the time. I cannot even express how terrible it would be if this became a leash only area.

Fort Point: Alt A.

Baker Beach: Alt A.

Fort Miley: Alt C.

Lands End: Alt A.

Sutro Heights: Alt E.

Ocean Beach Snowy Plover Protection Area: Alt C. Protect wildlife areas, keep the rest as voice control.

Ocean Beach: Alt A.

Fort Funstron: Alt A. Having this huge park as off-leash, voice control is really important for me and my dog, but also for the dog walkers of this city.

Correspondence ID: 11 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:04:44

Correspondence Type: Web Form

Correspondence: Your plan to ban dogs on the sandy part of ocean beach South of Irving St. is not acceptable to dog owners of San Francisco. Most people get dogs to have someone to walk with them on the beach. My dog died in May. Since then I havAt e walked the beach alone. It is not fun. I am about to get another dog to have someone to walk the beach with me. If you do not allow me to walk my dog on the beach on leash, I may as well stay home and become obese. I am 81 years old, I live at Ulloa St. and cannot get to the area North of Irving St. Yes, I can walk on the path with my dog, but I love being on the beach itself, at the water's edge. Please reconsider allowing dogs on the beach area. Thank you for your consideration. Sincerely, Jean Mont-Eton

Correspondence ID: 12 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:06:54

Correspondence Type: Web Form

Correspondence: we are muir beach residents and dog owners. we live adjacent to the beach alongside a highway. there is basically no place to walk our dog other than Muir Beach. period. Tamalpais State Park is closed to dogs as are large portions of GGNRA trails in our area. We are deeply committed to the restoration of Redwood Creek. It is saving the salmon and reducing our flood risk. We are daily stewards of the beach. Our labrador retriever is part of our family and community. She is not a risk to anything at Muir Beach at all. To close Muir Beach to dogs and their owners would be an

extraordinary blunder on the part of the GGNRA. Who do you think will be visiting and caring for this treasure in our community if people like us are not out there every day? Tourists? Please be realistic and considerate of the lives of people and animals in this community and DO NOT stop access for dogs at Muir Beach EVER.

Correspondence ID: 13 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:11:58

Correspondence Type: Web Form

Correspondence: Dear Sir or Madam,

We are furious about these proposed regulations.

There are over 100,000 dogs in San Francisco and they need somewhere to go. Fort Funston and the Presidio are wonderful places for dogs to run off leash. This is one reason San Francisco is so beautiful and unique. By restricting off leash walking in the GGNRA you may inadvertently destroy our neighborhood parks. There are just too many dogs and not enough parks already. Finally, as the owner of an active dog, we need off-leash places for our dog to recreate and we hope you reconsider these proposed changes.

Sincerely,

Mark & Ashley Cashel

Correspondence ID: 14 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:13:07

Correspondence Type: Web Form

Correspondence: For over 100,000 dog owners in San Francisco, a critical reason we live here is because of the dog-friendly nature of our community. We are responsible, tax paying citizens who enjoy the parks. We support the parks--and have an interest in keeping them pristine. Displacing us and our animals is not a solution. It is a means to divide the community and reduce the quality of life for those who own dogs and enjoy our friends and fellow community member's animals while in the parks. This is an issue for everyone and a community issue overall. If we can't take our dogs to the park, we will be forced into small, crowded community grass areas and that will affect everyone.

Correspondence ID: 15 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:13:53

Correspondence Web Form

Type:

Correspondence: Dogs have been allowed on Muir Beach for many many years. People come from all over the Bay Area (especially from other parts of Marin County) to enjoy the beach with their dogs, especially in the morning.

There are many beaches in the Bay Area where dogs are not allowed. Muir Beach should remain as one of the few that are left where one can bring their dog.

I don't realistically see how dogs can adversely impact the environment. They're not jumping in the creek to eat salmon or frogs. They simply go from the parking lot to the beach and frolic and romp and chase balls and add to the recreational experience. The lagoon area remains as a wetland habitat for everyone else to enjoy.

Correspondence ID: 16 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:24:58

Correspondence Type: Web Form

Correspondence: Have lived in Muir Beach since 1979 and have not been bothered by having dogs on the beach. If there is a way to see that owners monitor their dog's behavior and clean up after them while at the beach, I think that dogs add a positive note to beach days.

Correspondence ID: 17 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:36:13

Correspondence Type: Web Form

Correspondence: As a resident of Muir Beach, the proposed ban on dogs at the beach is extremely upsetting to myself and most of the community. Dogs have been permitted at Muir Beach since the formation of the GGNRA (with the exception of a brief period that was soon overturned), so this is a distinct departure via this proposed rule. Though we supported the Redwood restoration project with both our volunteer work and tax dollars, it is especially upsetting that this is one of the reasons being mentioned for the proposed ban.

I walk my dog daily from my home down to the beach and up along the trail above the beach. Most week days the beach is completely deserted and it seems ludicrous to ban dogs during these times.

You can expect a very large public outcry at this proposed ban -- with petitions, flyers circulated throughout Southern Marin and a strong protest

presence at public hearings. I hope you will consider seriously the strong feelings of the community who have every right to enjoy this public space with their pets.

Sincerely, Joanie Wynn Muir Beach, CA

Correspondence ID: 18 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:40:21

Correspondence Type: Web Form

Correspondence: Dogs on Muir Beach are a wonderful thing. Having the beach available as an area where off-lease dogs, under their owners control is permissible should be preserved. In the several years I have lived at Muir Beach I have not observed any problems with the dogs of locals or visitors. People self police and a very respectful. Signage encouraging this would be appropriate as well as additional pet waste collection bag dispensers.

Thanks

Correspondence ID: 19 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:42:10

Correspondence Type: Web Form

Correspondence: I wish to submit my thoughts and concerns about your proposed new policy to keep dogs off of Muir Beach. I am in real estate and sell most of the homes here. I find that it's common for buyers to want to be surrounded by nature and to walk down to their beach to run their dogs (it's healthy for both the owners and the dogs and it's safer than just going alone and leaving the dogs confined at home). A brief walk to the local beach, letting our dogs run in the waves, saying "hi" to our neighbors is a wonderful, attractive community feature that buyers can request when deciding to purchase homes at Muir Beach (adding to our property values in a special way). And it doesn't make environmental sense to ask us to actually DRIVE our dogs to a dog park that's 6 miles away or to another beach that's 1/2 hour away. Using our local beach makes sense, and Muir Beach shouldn't be closed off to our dogs. I've seen ravens and sea gulls on Muir Beach, but our dogs seem more interested in just running and enjoying their brief freedom with their owners and neighboring dogs. Such a wonderful time together is happy and healthy for us all. Please don't ruin that. Thank you, Debra Allen, Realtor

Correspondence ID: 20 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:55:47

Correspondence Type: Web Form

Correspondence: The plan makes a great deal of sense and moves toward protecting both the wildlife and human safety in open park spaces. My wife, friends and I have hiked all over the Bay Area for many years and it has become a regular, expected part of our Nature experience to encounter dogs and their owners many of whom consistently and carelessly allow their animals to charge or chase us or wildlife. I have had many pets throughout my life and do not hate dogs. Yet, the situation has become intolerable when we are forced to carry walking sticks or pepper spray simply to defend ourselves from the thoughtlessness of others. Please implement these stricter rules and regulations for the benefit of the vast majority who simply wish to enjoy the beauty of the Bay Area in peace and safety. Thank you!

Correspondence ID: 21 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:56:13

Correspondence Type: Web Form

Correspondence: Walking my dog on Muir Beach and letting her run free in the surf is one of the freedoms I treasure. Please don't take that away.

Correspondence ID: 22 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:57:19

Correspondence Type: Web Form

Correspondence: Look, it's all about the poop. That's really what it comes down to. We walk our dog every day and lucky for us, she actually only likes to poop at our house. But when she does poop in public, we pick it up. Plain and simple. When I see poop laying around it definitely angers me and is disgusting. I totally agree. That is completely irresponsible of the dog owners. NOBODY wants to step in poop, or see it. Rather than ban dogs from being off-leash, just create a much bigger fine for people who dont pick up their poop. SF cant afford to add police to areas, but if people have the fear of a steep fine they will think twice about not cleaning up. Thank you!

Correspondence ID: 23 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 12:58:56

Correspondence Type: Web Form

Correspondence: I would like to comment on the proposed rule changes on dogs within the CGNRA.

I am a former resident of San Francisco, and I am a frequent visitor to

various locations within the CGNRA, especially Ocean Beach. I have surfed Ocean Beach almost every single week since 1980.

In my opinion, the proposed rule changes have no merit whatsoever. From my personal experience, I would take issue with the rationale that is being presented to change the rules from the 1979 Pet Policy:

-Data presented for problems within the existing rules seem extremely low, and do not support any change -The main problem presented within the data seems to be for off-leash violations, however the problem with dogs present within restricted area are quite low. -Fecal contamination by dogs at Ocean beach is cited as a rationale for restricting dogs, however due to strong currents and wave action, the only time I can remember any problem with water quality at Ocean Beach is due to sewage overflow.

CGNRA seeks to impose more restrictive regulations on pets. In my opinion, such increased regulation does not take into consideration the CGNRA's unique location next to a major metropolitan area, and unnecessarily impacts historic and generational use.

As far as I can see, the only impact of increased regulation is a chance for the NPS to increase fining people for leash violations, which will not offset the \$1,500,000 budget cited for implementation.

We do not need more regulation nor increased budgets. Please allow responsible pet owners to continue to enjoy the area in line with the 1979 Pet Policy. I will support any legal action to prevent unnecessary restrictions to be put in place.

Correspondence ID: 24 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 13:06:43
Correspondence Type: Web Form
Correspondence: To whom it may concern:

Banning dogs at Muir Beach is a bad idea. (Federal plans would ban dogs... Chronicle Jan. 13, 2111). Who really comes up with these stupid and costly plans? It surely isn't someone who lives in Muir Beach. It's likely some bureaucrat sitting in an office in Washington that doesn't even know where Muir Beach is.

I'm a 25 year resident of Muir Beach, a member of the Muir Beach Volunteer Fire Dept. for 22 years and an EMT. I have never responded to Muir Beach for an emergency caused by a dog. Dogs may poop, but the don't drink alcohol, break bottles, litter, carry weapons, start fires, drown or

fall off cliffs. If the park service superintendent really wants to make Muir Beach a better place, he or she should ban people. Let the dogs have the beach. The people can sit in their cars and litter the parking lot.

The excuse that some how dogs effect the environment or chase or scare birds is a smokescreen. In 25 years I've never seen a dog catch a bird. At most they chase away seagulls and crows that are scavaging the trash and vomit left by humans. Is the park service going to ban horses? Ban fires? Ban alcohol? Are they planning to enforce littering laws? Are they planning to clean the disgusting porta-potties once in a while? In other words, is the park service planning to do something that really matters or just this petty bureaucratic crap?

In addition, I have always felt much better, when my wife and children are out enjoying the beach and trails, that they have our dog with them for safety. Our dog would only lick the would be bad guy to death, but he wouldn't know that. Women and children should be allowed to have this benign level of protection and companionship wherever they go in our parks.

Robert Allen, MBVFD, Muir Beach.

Correspondence ID: 25 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 13:08:22

Correspondence Type: Web Form

Correspondence: I am writing about the proposed changes to allowing dogs in the various areas of the GGNRA, and what restrictions should be placed in various areas. As a dog guardian and resident of Muir Beach, I adamantly oppose any changes to the current restriction on dogs in the GGNRA. I prefer option A in the Executive Summary. I am sympathetic to the need to reduce conflict between dog owners and those who may be afraid of dogs, the preservation of habitat, and reducing potential liability of the GGNRA. Let me address these items in the order I have listed them. 1) Nobody can control the fear of others, but we can enforce leash laws that allow owners to control their dogs, even if the dog does not respond to voice control. I have encountered people who are morbidly afraid of dogs, either through personal experience, irrational fear, or cultural learnings. The solution is simple: I simply move my dog to one side and place myself between the dog and the person. 2) The biggest problems to habitat are restricting usage of the park to trail or public use areas and dog feces. Park trail access is also a problem for humans. I recently saw a family in Muir Beach that didn't want to use the pedestrian bridge, saw a shortcut through the lagoon and trampled through the newly planted area that park staff and volunteers have so carefully planted. They didn't have a dog. Should we also ban humans from

Muir Beach as well? If you value the habitat, that may be prudent. I see far more humans abusing habitat at the Muir Beach lagoon than people, including off-trail usage and littering. On the matter of dog fecal matter, why not require all people that are walking dogs to provide evidence of having poopie bags for removing litter? Anyone without a bag is obviously going to let their dog's fecal matter by the side of the trail and should be fined. 3) On the liability of the GGNRA, the only lawsuit against GGNRA was brought regarding Fort Funston access by dog owners. If the GGNRA bans dogs outright, does this increase liability risks? I think it does. I would like to see compiled statistics on the number of dog bites vs. number of people coming to the park. Is this a true problem? Is the frequency of dog bites normalized by visitors increasing? Or is the absolute number increasing while park personnel are decreasing? There are other matters to consider: Enforceability. If the park wants to ban dogs at this point, does GGNRA have the resources to enforce the policy? I frequently hike the hills in Marin and in the past 5 years I have only seen a ranger on a trail once. Some people may decide to take their chances with enforcement. Public access. As residents of Muir Beach, there aren't a lot of choices for walking a dog. Muir Beach is a small community that is ringed by state and national park land. Restricting to the options that allow no dogs would only mean that we have to use our greenhouse gas polluting cars to go somewhere that allows dogs, increasing traffic congestion needlessly on Highway 1. Is this the intended action of the GGNRA? I would posit that my car harms the environment more than my dog, unless the GGNRA has evidence to the contrary to present to the public.

I appreciate your time to hear my concerns about the proposed changes to dog access in the GGNRA.

Sincerely, Scott Crowder

Correspondence ID: 26 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 13:15:44

Correspondence Type: Web Form

Correspondence: As a resident and dog owner of Muir Beach California, I am sincerely requesting that the dog policy for Muir Beach remain as it is - Please take no action. The dogs and dog walkers that enjoy Muir Beach are consistently thoughtful and respectful of both nature and people. I have never witnessed a dog disturbance or any destruction resulting from the dogs that enjoy the beach. I urge you to continue to allow all those that enjoy the beach to continue to enjoy as they do today - regardless of the number of legs they have.

Sincerely yours, Muir Beach lover and dog owner.

Correspondence ID: 27 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 13:32:24

Correspondence Type: Web Form

Correspondence: I support your new regulations, WILL YOU ENFORCE THEM??? My small son has been knocked down by a dog, chased by dogs and I ALWAYS have to be on guard in GGNRA areas because there are always owners who are off leash letting their dogs come up to my son rambunctiously & sometimes I am not even sure what the dog's body language is. The dog owners always have an "attitude" about this when I fend their dog off my kid. I can not play catch with a ball or a Frisbee on ANY beach within the GGNRA without having an unwanted rambunctious dog join in and grab the ball or Frisbee at some point. Don't believe me? Go try it with some little kids. Are you guys going to enforce the leash law or are you just politely going to ask owners to follow the rules & have that go out the window as soon as the officer leaves which is what goes on now? You would think the GGNRA is *currently* running a big dog park. Don't even get me started on the birds that USED to be at Fort Funston. They are all gone now? It seems that every beach in the GGNRA is a bird rodeo for dogs too. How did it get this way?

Correspondence ID: 28 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 13:41:41

Correspondence Type: Web Form

Correspondence: One of the great pleasures of going to our beach is watching the obvious joy that dogs experience as they visit the beach. They always brings a smile to other beach walkers. What possible reason could there be for forbidding them? I've lived in Muir Beach for eight years and have NEVER seen dog feces left on the sand for others to deal with. Our dog owners are responsible and clean up after their pets. And the pets themselves are a delight for young and old alike. KEEP DOGS ON OUR BEACHES!

Correspondence ID: 29 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 13:42:25

Correspondence Type: Web Form

Correspondence: As a resident of Muir Beach and a dog owner I am very distressed by the news that the GGNRA is considering complete prohibition of dogs on Muir Beach. There are already significant limitations placed on where one is "allowed" to go with a dog and these regulations are becoming unpleasantly excessive in this community. I don't believe that GGNRA has in it's mission

statement the goal of preventing a whole subsection of the population the right to enjoy the hills and beaches of our neighborhood but that is in essence what this proposal will do.

I do not believe that anything good can come of absolutes and at the very least there should hours in the morning and late afternoon, early evening where there would be no limitations placed on dogs or their owners.

Nikola Tede

Correspondence ID: 30 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 13:42:46
Correspondence Type: Web Form
Correspondence: I AM A RESIDENT AND HOME OWNER OF MUIR BEACH AND I AM KEEN THAT DOGS REMAIN WELCOME VISITORS TO OUR BEACH, ALONG WITH THEIR OWNERS!

Correspondence ID: 31 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 13:55:14
Correspondence Type: Web Form
Correspondence: Please, please, please do not require leashes for dogs on the beaches!!! Walking a dog on leash on a beach is torture for both human and dog. The birds know how to fly away and be safe! I have never seen one injured; everybody has a great time.

Correspondence ID: 32 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 14:03:36
Correspondence Type: Web Form
Correspondence: Hi,

I have lived in Muir Beach, CA for 14 years. I don't have a dog, but many of my friends and neighbors do. So much of my enjoyment on the beach and trails where dogs are currently allowed, is spent with my friends and their canine counterparts. Everyone I know here with dogs has been so respectful of the wildlife and environment as far as their dogs are concerned. Dogs are such a large part of our community, and, as we are such a close neighbor to the GGNRA with Muir Beach, I strongly encourage and support the NPS continuing their current policy of allowing our dogs off leash on Muir Beach.

Thanks,

Kathy Johnston Sunset Way Muir Beach

Correspondence ID: 33 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 14:52:49
Correspondence Type: Web Form
Correspondence: People who train their dogs to be friendly. voice and eye responsive, and who clean up after their dogs should not be penalized for the laxity of roughly 2% of those who do not train their dogs appropriately. Particular, and punitive laws should apply to those who leave aggressive, attack dogs off leash or out of their control. It has been my experience that any peaceable dog owner will immediately call law enforcement when they or their dogs are threatened or attacked by such dogs. It has also, unfortunately, been my experience that there is no timely response. Perhaps this is where the study should focus. It appears such a study would be far less expensive and the lack of reaction would be more accountable.

If any consideration of these laws is just to make money, it should come from harsher fines against those owners who do not register their dogs nor train them to respond peacefully in all circumstances while on public property - including respecting the space of other species.

Correspondence ID: 34 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 15:08:15
Correspondence Type: Web Form
Correspondence: The proposal to disallow Dogs to be off Leach on Beaches is another curtailment on our personal freedom. All Birds, Plants, Animals and People have interacted as long as there existence. How do you plan to control any other wild life that may show up on a Beach that does not have a Taxpaying owner to their credit? Birds have always coexisted with other Animals and thrived. Controlling the natural world has brought us to the imbalance in our environment we are now experiencing. I would strongly recommend reconsidering and finding some other project more deserving of the very scarce funding.

Correspondence ID: 35 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 00:00:00
Correspondence Type: Web Form
Correspondence: To: National Park Service We, the undersigned, strongly urge the Citizens'

Advisory Commission (CAC) to the Golden Gate National Recreation Area (GGNRA), Superintendent Brian O'Neill, the National Park Service, Senator Dianne Feinstein, Senator Barbara Boxer, Representative Nancy Pelosi, Mayor Willie L. Brown, Jr., the San Francisco Board of Supervisors and other elected and appointed officials to take the necessary action to maintain the right of dog owners to walk with their dogs under voice control and off-leash as well as current on leash areas in the GGNRA.

The proposed policy is exclusionary and bans responsible dog owners from use of current and future areas acquired by the GGNRA. Specifically I would like to see Sweeny Ridge, San Pedro Point and Rancho Tierra Maintain current policy towards dogs on leash.

Aaron Read

Correspondence ID: 36 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 00:00:00
Correspondence Type: Web Form
Correspondence: To: National Park Service We, the undersigned, strongly urge the Citizens' Advisory Commission (CAC) to the Golden Gate National Recreation Area (GGNRA), Superintendent Brian O'Neill, the National Park Service, Senator Dianne Feinstein, Senator Barbara Boxer, Representative Nancy Pelosi, Mayor Willie L. Brown, Jr., the San Francisco Board of Supervisors and other elected and appointed officials to take the necessary action to maintain the right of dog owners to walk with their dogs under voice control and off-leash as well as current on leash areas in the GGNRA.

The proposed policy is exclusionary and bans responsible dog owners from use of current and future areas acquired by the GGNRA. Specifically I would like to see Sweeny Ridge, San Pedro Point and Rancho Tierra Maintain current policy towards dogs on leash.

Emily Read

Correspondence ID: 37 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 15:50:02
Correspondence Type: Web Form
Correspondence: Dear Sir or Madam,

I am extremely upset about these proposed regulations.

There are over 100,000 dogs in San Francisco and they need somewhere to

go. Fort Funston and the Presidio are wonderful places for dogs to run off leash. This is one thing that makes San Francisco so beautiful and unique. By restricting off leash walking in the GGNRA you may inadvertently destroy our neighborhood parks. There are just too many dogs and not enough parks already. Finally, as the owner of an active dog, we need off-leash places for our dog to recreate and we hope you reconsider these proposed changes.

Sincerely, Peyton Grubbs

Correspondence ID: 38 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 16:21:43
Correspondence Type: Web Form
Correspondence: I for one would like to applaud NPS for the approach taken in the preferred alternative. As a frequent National Park user, I feel that the "preferred alternative" takes a balanced approach that considers the visitor experience of ALL park users as well as the maintenance and conservation of the GGNRA's cultural and natural resources. I hope the preferred alternative wins out.

Correspondence ID: 39 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 16:28:03
Correspondence Type: Web Form
Correspondence: The proposed recommended alternatives for baker beach, fort funston and crissy field have access issues that question both the fairness and legal viability of the plan.

Given that the park service has proposed off leash dog walking, under voice control, as a valid recreational activity it has a responsibility to ensure that all users have equal access to partake in this activity. This means equal parking, facilities, and physical access.

For those with disabilities, pregnant, with young children, or elderly, it is often difficult to walk, even a very well trained dog, on leash for great distances. For example, at Crissy Field the parking is so limited near the acceptable off leash areas that it would make it essentially useless to these types of users. Plus there are no nearby facilities. The same goes for the beach access at Fort Funston.

How can you enable a recreational activity that only a few can use?

Continuous off leash access from parking lot, to facilities to off leash

designated areas is a must in all cases. Otherwise you are discriminating. It is an issues of law and fairness.

Correspondence ID: 40 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 16:32:16

Correspondence Type: Web Form

Correspondence: Part of your mission is to preserve the cultural history of the parks. Not the culture of the parks. I have had frequent dealing with the park service and it is the culture of the park service to limit or ban dogs in the parks. It has long been the culture of the park to have a robust off leash dog culture where people meet and great friends, family and nature. This culture long predates the parks. Any attempt to change this culture is a violation of the parks purpose.

Walking your dog off leash long predates GGNR. It is part of GGNR's history and culture and therefore it deserves to be preserved. This plan does not do that. It appears deliberately designed to limit access or provide access only where it is difficult or impractical to use.

Do your job, preserve the culture of the parks. You must provide much more off leash dog areas that provided in the recommended alternatives.

Correspondence ID: 41 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 16:46:19

Correspondence Type: Web Form

Correspondence: My concerns are with Crissy Field which I visit almost daily. Over the years it has been transformed into an off-leash dog park. During this time I have been injured, attacked, and threatened by dogs and dog owners. On one occasion while I was jogging a woman throwing a ball on the promemade to three large dogs hit me from behind while the dogs were running at full speed. I filed a report. Another time my 4 year old child was traumatized when he was tackled by a dog also on the promemade. I had numerous encounters with dogs approaching me in an agresive way. When I asked their owners to leash their dogs I was insulted and even threatened. Parking was increased over the original plan and it has brought SUVs with dogs to the park. Even if dogs have to be leashed on the promenade dog owners will let their dogs run off the leash from their cars to the beach. Other cities have designated fenced in small and large dog areas to go off-leash. The grass area on the other side of the parking lot would be perfect. Enforcement is also a concern. When there used to be an enforceable policy it was not. Residents and visitor to Crissy Field should have the right to enjoy it without being harassed, inconvenienced or threatended by dogs and dog

owners. Ideally dogs should be banned but this is San Francisco.

Correspondence ID: 42 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 16:49:33
Correspondence Type: Web Form
Correspondence: A very large percentage of California households include dogs. Fort Funston & Chrissie Field are perfect places for dogs to run and swim off-leash. Their effect on wildlife at these sites is non-existent and it makes no sense to ban off-leash dogs at these sites. If people don't want contact with dogs, stay away from these sites. There are plenty of other places they can go to enjoy the Bay and ocean.

Correspondence ID: 43 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 16:54:03
Correspondence Type: Web Form
Correspondence: I've never seen any problems with dogs offleash in these areas. Instead of prohibiting dogs, maybe they can apply for a "license" - you can even charge for the license. The license would require owners to follow certain rules otherwise get cited. This would make owners accountable and still allow well-trained dogs to enjoy your parks.

Correspondence ID: 44 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 17:04:25
Correspondence Type: Web Form
Correspondence: To whom it may concern,

We just became aware of the proposal to ban dogs from Muir Beach today and we are ADAMANTLY OPPOSED to such a ban. We have owned our home at Muir Beach for 5 years and are frequent users of the beach. At no point have we ever felt that there was an issue with dogs on the beach, and frankly I cannot imagine Muir Beach without our canine friends being permitted to also be present at this public, open space.

If there is an exception that needs to be granted, or extended, to continue to allow dogs on the beach, it should be extended. This is not merely a matter of whether or not people can continue to bring their dogs along with them to the beach, this is a "way of life" matter that frankly I am shocked to see up for consideration in the state of California and, more specifically, in the bay area.

Please let me know if there is something more that I can do to introduce balance and reason into this debate.

Sincerely, Steve Pattison Mobile: Email:

Correspondence ID: 45 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 17:04:28
Correspondence Type: Web Form
Correspondence: I AM A REGULAR VISITOR TO FORT FUNSTON BECAUSE IT IS ONE OF THE VERY FEW AREAS WHERE I CAN TRULY LET MY DOGS RUN OFF LEASH AND PLAY WITH OTHER DOGS. WHEN ALL DOGS ARE OFF-LEASH THERE SEEMS TO BE A WONDERFUL, NON-AGGRESSIVE ATMOSPHERE AMONG OUR PETS. IT ALLOWS THEM TO PLAY NATURALLY AND LET OFF STEAM. THIS CAN'T HAPPEN WHEN THE DOGS ARE ON-LEASH. IN THE SAME WAY THAT WE BUILD PARKS FOR CHILDREN TO RUN AND PLAY IN, SO SHOULD WE BUILD AREAS WHERE OUR BELOVED PETS (WHO SOMETIMES ARE OUR CHILDREN) CAN RUN AND PLAY HAPPILY. PLAN E FOR FORT FUNSTON IS BY FAR THE BEST ALTERNATIVE, IN MY OPINION. IT GIVES ALL PET OWNERS THE MAXIMUM AMOUNT OF OFF-LEASH SPACE WHILE STILL PRESERVING AREAS FOR OTHER HABITATS. I TRULY HOPE YOU CONSIDER HOW MANY DOG LOVERS FREQUENT FORT FUNSTON AND WEIGH OUT YOUR DECISIONS BASED ON THAT. THERE ARE MILES AND MILES OF COASTLINE WHERE DOGS ARE NOT PERMITTED ALREADY. THANK YOU.

Correspondence ID: 46 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 17:41:15
Correspondence Type: Web Form
Correspondence: I drive from South San Jose to Fort Funston because it is one of the only places left in the entire bay area where I can enjoy off-leash time with my dogs. Please do not take these last havens away -- there are countless on-leash or no-dogs public areas for all to enjoy already, but so very few choices left to us.

Correspondence ID: 47 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 17:56:13
Correspondence Type: Web Form
Correspondence: I just received notice that your 'preferred option' regarding dogs at Muir

Beach might be a complete ban on dogs on the beach. I disagree with this option, and would like to oppose it in the strongest possible way. There are several reasons. I am a senior citizen, a taxpayer, and a decade long resident at Muir Beach. I recently acquired a small dog. She lives with us at Muir Beach. As you know, most of the week the beach is largely deserted. The dog loves to run on the beach. She also gets to play with other dogs. If she was banned, there is no other comparable open area within 5 miles. It would not be excessive to say that a ban on dog use would constitute cruelty. Many people use Muir beach for recreation specifically because of the access under voice control policy. There are many other beaches where dogs are not allowed, and where people who prefer not to associate with dogs could find what they want. But there are very few beaches like Muir Beach. Informally, on weekends I have counted as many as 8 dogs on the beach at a time. They socialize happily, and their owners also enjoy the social milieu created. By moving to a no dogs policy, you would be changing an established habit for those of us who abut the area. I would do all in my power to use whatever laws protect habitual and established use of outdoor areas to contest the policy. I am reasonably sure that I would have considerable support in this. I routinely look for signs of dog scat on the beach. I have actually never found any, although occasionally a coyote seems to feel compelled to leave her mark. I have never witnessed an instance of a stray or out of control dog on the beach. I support continuing the access off leash under voice control policy for dogs on Muir Beach.

Correspondence ID: 48 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 18:08:32

Correspondence Type: Web Form

Correspondence: I do not understand why your organization continues to restrict dogs off leash both on the coast and bay. There are more than enough areas both for dogs and their owners, and people who hate to see happy dogs. Fort Funston and Crissy field are perfect examples. It would be so simple to section off areas where dogs can run and play from areas where dog haters can walk. As far as the Snowy Plows are concerned.....these areas should also be sectioned off from both people and dogs. I do not understand, when this country has so many real issues of safety and concern...people continue to zero in on restricting dogs from beaches and trails as if by doing this the world will be a better place. Perhaps the GGNRA should look to the success of the East Bay Regional Parks.....both parties can be and are happy.

Maybe we should also restrict all people with blue eyes....?????????

Sad

Correspondence 49 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,14,2011 18:44:44

Correspondence Type: Web Form

Type:

Correspondence: Muir Beach has always been a wonderful place to walk and to play with my dogs (several of them over the past 80 years) Owners are responsible for their dogs behavior, but the opportunity to run the shore, play catch and tease should NOT be taken away.

Correspondence ID: 50 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,14,2011 18:45:33

Correspondence Type: Web Form

Type:

Correspondence: I have lived in the Bay Area since '89 and the last 12 years in Muir Beach and also considered Muir Beach to be one of the most special places in Marin. One of the things that made it special was that it is dog friendly. I don't have a dog today but many of my friends do and I DON'T see any reason to change what we have today. So, please let the dogs run.

Keith Adams

Correspondence ID: 51 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,14,2011 19:32:04

Correspondence Type: Web Form

Type:

Correspondence: Dogs belong on Muir Beach like kites belong in the sky. As a resident dog owner I see little negative impact from dogs running the beach. In fact more litter is left by families and young partyers than could possibly be left by dogs. And when you take into consideration the number of strangers that have met over watching their dogs play together it's a "no brainer" This would not happen if they just came to take in the sun and the scenery. Some people specifically buy dogs for this social activity. I personally like waking on a Sunday morning early to just watch all the fun the dogs are having running in and out of the waves sprinting up and down the beach chasing balls chasing each other it's all good. This place has been "dog heaven" since way before I got here 15 years ago and should remain so. The local volunteer fire department even has a dog as a logo. You may pass whatever law you want but you might then also start planning on how you'll deal with all the civil disobedience. I for one will not abide by anyone telling me I have to leash my dog on this beach. And I'll still tell every dog owner that I know to keep coming out to Muir beach with their pooch cause it's "dog heaven" respectfully John Koene

Correspondence ID: 52 **Project:** 11759 **Document:** 38106

Received: Jan,14,2011 19:32:44
Correspondence Type: Web Form
Correspondence: please continue to allow unleashed dogs at muir beach

Correspondence ID: 53 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 20:35:23
Correspondence Type: Web Form
Correspondence: I just want to thank you for putting together this plan and let you know I support it.

Correspondence ID: 54 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 20:56:56
Correspondence Type: Web Form
Correspondence: My husband and I are the proud owners of a sweet, energetic, fun-loving 2 year-old, 65 pound dog. We ensure he gets the training, nutrition and exercise he needs to be a happy, healthy dog. We walk him twice a day; he goes to playgroup or daycare 5 days a week and his absolute favorite place on the planet, Fort Funston every weekend. His health and welfare are of utmost importance to us. Dogs need places to run freely, sniff around and play, on-leash activity is not sufficient for a dog's needs. Not getting enough exercise can lead to behavioral issues. It's in the best interest of everyone to have sufficient areas for dogs to get the exercise they need. Due to the population density in San Francisco, there are not a lot of yards and a lot of people live in small places. It is absolutely essential to have places to exercise dogs. We always try to be cognizant of others that may not share our love for dogs and are understanding of that. That is one of the reasons we drive all the way out to Fort Funston every week so we can enjoy time with our dog and not disturb others. I can understand having restricted areas where there are a lot of people, such as Crissy Field. I think it is more than reasonable to have at least one area without a lot of restriction. I can't comment on all the areas since I haven't been, I will stick to commenting on my experiences. There so many beaches for people to go to, and many that don't allow dogs at all if people do not want to be around them and just a few places for dogs.

We take our dog to Fort Funston every week, all year-round. Ninety-five percent of the people here are there with their dogs and generally these people that are willing to drive out there to get their dog the appropriate exercise are responsible dog owners. I personally have never seen someone out there not pick up after their dog, never seen any disturbances between dogs, never seen a dog bothering a person. I'm sure there have been isolated incidents; however, I have never seen it and I've been there at least a 100 times. We are out there on cold winter days in our down jackets with only

other dog owners in sight. We are the main users of this particular park; we should be the ones whose enjoyment should be priority. The only other consistent users I see are horseback riders and a few times a year a hand glider or two. It's entirely possible all of the non-dog users go at different times from me or during the week but I feel very confident in saying that dog owners are the clear majority. I certainly am not saying no one else should be able to use the area, of course they should, but it doesn't make sense to restrict the use for the majority of people there to cater to a small minority.

This study also doesn't take into account the high-tide at Fort Funston. There are times when the entire beach is underwater. The preferred alternative would not allow anywhere for dogs to run at these times and we conscientious dog owners are there all year-round.

This study claims to be interested in the enjoyment of parks for everyone, except that the needs of non-dog owners are clearly priority. It is clear that the study does not understand the population of San Francisco. There was an article in the SF Chronicle that said there are more dogs in San Francisco than children, an estimated 120,000 dogs. The study doesn't appear to realize that we are also the users of the parks, and instead of trying to unreasonably restrict us; it should be focused on how to better serve dogs and their owners. We feel as though we are treated as second-rate citizens for having a dog.

There seems to be a concern about people being able to have a "no-dog" beach experience. I don't particularly enjoy having children screaming, running around, kicking up sand while I'm trying to have a relaxing beach day. I don't know of any child-free beaches. I don't see a difference between that and someone not liking dogs. Dogs are part of people's family's and if someone is in a public area, they have to deal with other people's choices of how they want to spend their day. Are you going to ban BBQ's because someone doesn't like the smell, beach balls because they might fall into someone's picnic? That's just unreasonable.

That people would want a no-dog experience at Fort Funston is unrealistic. I find it hard to believe that the people that wrote this study have been there. I have, every week, there is usually at least one dead animal on the beach (sea lion, bird, dolphin), sometimes several of them depending on the season and trails of horse dung everywhere. I'm shocked that people see dogs as more of a problem disturbing people there, rather than dead animals and horse dung. I love the place and it's beautiful, however, its definitely a "raw" natural beauty, its not exactly white sand beaches. I'm perfectly happy to take the less desirable beach to have as a haven for my dog, it seems like the dog haters aren't even satisfied with that.

Correspondence ID: 55 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 22:51:19
Correspondence Type: Web Form
Correspondence: I support dogs under voice control at muir beach. Yeschi Neumann

Correspondence ID: 56 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 22:52:57
Correspondence Type: Web Form
Correspondence: My first comment:

The Newsletter I just received on the Dog Management Plan is incorrect in that it lists the download site as parkplanning.gov/goga.

The correct web site is parkplanning.nps.gov/goga.

This is a serious error since that is the place where the document should be for most people reviewing it!

(1/14/2011)

Correspondence ID: 57 **Project:** 11759 **Document:** 38106
Received: Jan,15,2011 01:19:26
Correspondence Type: Web Form
Correspondence: I don't even know where to begin. i understand park land in the Bay Area is

meant to be shared with everyone, including local wildlife and plants, people and people with pets. Maybe I'm uneducated about current problems or issues occurring in the parks right now. I doubt anyone would go to this effort if there weren't some problems or complaints, so I understand there MUST be some reason GGNRA is trying to implement changes to the status quo.

That being said, I am heartbroken at the prospect of loosing the freedom and pleasure I have walking my two dogs off leash in some cherished areas. I have been bringing my dogs to Fort Funston for several years. Our walks there are occasional treats for both them and myself. We enjoy time at Ocean Beach and Crissy Field as well, but NOTHING compares to Fort Funston. Dog owners refer to that place as dog heaven on earth. The dogs simply walk and play and sniff and don't ever seem to bother anyone or cause problems.

I can understand wanting to establish some clear locations where dogs aren't allowed off leash or not at all, especially if the local ecosystem is of

concern. But I am begging you as a tax paying, voting, contributing citizen of this area who has worked as police officer in San Mateo County for five years and who plans to give another twenty of my best years working for, and serving, the public, do not touch Fort Funston!!!!!!!!!!!!!! Anyone who goes there a few times will see, its is THE dog place. People do not go there UNLESS they have a dog. So I can't see the logic in making dog restrictions to an area ONLY frequented by dog people??

Please note, I am not asking for "dog parks" around the area. That is not what I, or my dogs, or my friends, with or without dogs, want. We want to go for WALKS, along trails, up and down hills, through fields etc. etc. The places we like to go are Sweeney Ridge, Fort Funston, Ocean Beach and Crissy Field.....a few places that can be set aside for the many dog lovers in this area, compared to the relatively fast expanse of the GGNRA? I simply don't go places that my dogs can't enjoy with me, so if they are banned, I'm banned, and that's very frustrating.

I think part of what makes up the character and culture of the Bay Area, is its dog-friendly atmosphere. I love the cafes and restaurants that let my dogs sit on a patio with me. The people around me always seem happier to have a dog wag their tail at them, and people walking by smile at them a lot. The same thing applies when we got out on walks. People seem to appreciate the wags and happy faces. Please don't let a few very vocal anti-dog advocates convince you that they are so disturbed by a dog walking by, they can't enjoy a park.

I would even suggest imposing steep fines for owners who fail to clean up after their dogs if you're trying to address the dog waste issue. If your trying to address the wildlife issue, make clearly defined trails and impose fines for dogs leaving the trails.....there's a lot of room for compromise here if you look for it.

Thank you for taking my input into consideration. Sincerely, Katie Miller

Correspondence ID: 58 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 08:42:48

Correspondence Type: Web Form

Correspondence: I understand where the GGNRA is coming from, but there must be better ways to coexist without such extreme changes. I'm a dog walker and I respect the on leash laws in certain areas. I do, however, NOT agree to limiting dog walkers to 6 dogs. If we have to pay for a permit, we should at least be legal at 8 dogs. There essentially putting a cap on what we can make. I'll lose well over \$30K per year with this change.

If I'm licensed, insured, a member of Dog Tec and I can safely walk 8 dogs on or off leash, then I should be allowed to. My first time walking at Dog Tec, they gave me 5-6 dogs off leash to walk and I did so successfully. I've been doing this for 5 years and you're capping me at 6 when I can do at least 8? Walkers should all have to be licensed and insured, and we all need to be more responsible out on the trails and at the beaches. Owning/walking dogs is a serious responsibility and those of us who take our jobs seriously are being penalized by those that don't.

Correspondence ID: 59 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 08:46:58

Correspondence Type: Web Form

Correspondence: Look at the people who go to the beach and walk their dog. Stop trying to micro manage people and start doing your job of enhancing the enviroment of Muir beach,take the huge busses that clog the roads for 10 months of the year off the roads,less people,less competition for space ,less impact on LOCAL INVIROMENT. Muir beach is a community that likes well behaved,friendly dogs.Quite trying to apply concepts that are wrong for this community.I want dogs to be band from the beach as much as I want the cayotes to stop howling every night,Maybe thats next.

Correspondence ID: 60 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 10:03:10

Correspondence Type: Web Form

Correspondence: I would love to be able to enjoy the GGNRA lands without dogs that chase wildlife, run up me without my permission, or appear in areas where they are not permitted. Therefore I fully support any effort to create dog-free areas and enforce leash laws.

However, since I regularly encounter dogs in prohibited areas and see owners take their dogs off leash as soon as they are around the bend from posted signs, I seriously doubt you will get any compliance unless you issue citations each and every time a violation is seen. Dog owners know they are rarely going to be cited so their behavior does not change.

Thanks and good luck.

Correspondence ID: 61 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 10:07:51

Correspondence Type: Web Form

Type:

Correspondence: Our family have three dogs that we regularly take to many of the sites that will be impacted by this new management plan. The dogs need spaces like Fort Funston to run and exercise and socialize in order to maintain health and happiness. We need these parks for all citizens to enjoy and that includes dog owners. I am a senior citizen who visits and enjoys our national parks frequently. On extended holidays, I do not take my dogs but on regular non holidays, I take the animals out to these wonderful spaces that keep our dogs happy and healthy.

Keep these spaces free of leash laws.

Sharon Mullen

Correspondence ID: 62 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 10:15:35

Correspondence Type: Web Form

Correspondence: I am opposed to any changes in dog policy and feel this is creating problems where there are none. The problem in our society lies much more with unleashed people than unleashed dogs! There are becoming fewer and fewer open spaces where people can enjoy outdoor recreational places with their dogs, and this is a shame.

Correspondence ID: 63 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 10:58:46

Correspondence Type: Web Form

Correspondence: This plan fails to address a key element of park management as it relates to dogs in the park. No where does the plan discuss training for park officials. This is a disaster waiting to happen. Any attempt to enforce the policy without adequate training will lead to lawsuits and possible death.

I do not exaggerate. A couple of years ago I witnessed a ranger pull a gun on a dog. There was a bunch of people and a few other rangers. It is one of the dumbest things I've ever seen. I highly doubt that ranger could hit a moving dog with his gun and more likely would have hit a nearby person. Whether dog or person it was an incident that could easily have ended in tragedy.

Here is the strange part. The dog was not being aggressive or threatening the ranger in any manner. Yes the dog was barking. But there is a difference between barking and threatening. It would take about 15 minutes of training to learn the difference by the type of bark, dogs body language, position of

the tail, etc. Most people who own dogs can discern this without any training at all. It obvious stuff.

Any plan that includes possible increased interaction, (ie enforcement), between park officials and dogs MUST include a comprehensive training plan and rules of engagement. This MUST include when it is acceptable to use lethal force versus pepper spray/mace or some other solution.

Be responsible. If not leave things as they are with very limited interaction between park officials and dogs.

My child was with me and could have been killed by that officer. 2400 pages and things are only more scary.

Correspondence ID: 64 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 11:09:17

Correspondence Type: Web Form

Correspondence: Ref your proposal for NO DOGS ON MUIR BEACH:

I'm astonished at this proposal, especially since Muir Beach residents have been extremely vocal in wanting to have dogs on the beach for years.... since the beginning of the GGNRA.

I am not a current dog owner, but love to have them on the beach and in our neighborhood. Most residents are deeply appreciative of our animal community and their welfare, and we welcome those who come to the beach with their four-legged friends.

I STRONGLY SUPPORT KEEPING THE POLICY AS IS!!!! Dogs can be off-leash, but within voice control.

Thank you.

Marilyn Laatsch

Correspondence ID: 65 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 11:18:08

Correspondence Type: Web Form

Correspondence: I support the plan 100% The current situation is out of control. The park areas have been taken over by dog owners letting their dogs run wild, harrassing other people and wildlife. It is impossible to enjoy these areas now. The dog waste is unbelievable, discusting and unsanitary. I prefer

banning dogs outright from all areas, but support this compromise. Please impliment this plan and enforce it with stiff fines!

Correspondence ID: 66 **Project:** 11759 **Document:** 38106
Received: Jan,15,2011 11:22:05
Correspondence Type: Web Form
Correspondence: please let dogs and their people have access to the whole wonderful GGNRA area, one of the greatest area in the world.

Correspondence ID: 67 **Project:** 11759 **Document:** 38106
Received: Jan,15,2011 13:02:59
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the issue.

National Parks are for people, not dogs.

Dogs should not be allowed in any National Park, National Seashore, National Monument, or National Recreation Area.

Exceptions should be made only for the following: law enforcement, search dogs, and guide dogs for the blind, not for utility dogs.

My wife and I hike throughout GGNRA and Pt Reyes. We often walk on many of their glorious beaches. We are not dog haters, we like dogs, just not with our nature. We have witnessed multiple issues and problems with dogs and their owners in the GGNRA and Pt. Reyes.

Dog owners have many other options for recreating with their dogs; they do not need to be on any of the trails or beaches in the GGNRA.

Violators should receive large citations.

Correspondence ID: 68 **Project:** 11759 **Document:** 38106
Received: Jan,15,2011 13:15:48
Correspondence Type: Web Form
Correspondence: I am opposed to further restriction of off leash Dog Access at Fort Funston. This area serves as one of the few natural open Spaces in the Bay area where dogs can run off leash. Dogs need off leash exercise for good health. And people benefit from healthy dogs. I have used Fort Funston for off leash walking for over seven years and have never seen any problems with

the dogs there.

However I would favor restricting commercial dog walkers, who bring up to 12 or more dogs a at time. There could be a rule that there would be a maximum of 2 dogs per person. I would not be opposed to a fee for use of the Fort Funston area.

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| Correspondence ID: | 69 | Project: 11759 | Document: 38106 |
| Received: | Jan,15,2011 13:30:01 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Please keep Fort Funston open for off-leash recreation for dogs. It is one of the things that keeps our family living in the city of San Francisco, which is often very family-unfriendly. When the suburbs beckon, a weekend morning at Fort Funston reminds us why we live in SF. | | |

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| Correspondence ID: | 70 | Project: 11759 | Document: 38106 |
| Received: | Jan,15,2011 14:18:10 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Please return to the 1979 Pet Policy allowing unleashed dogs UNDER VOICE CONTROL OF OWNERS at Ocean Beach in San Francisco. | | |

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| Correspondence ID: | 71 | Project: 11759 | Document: 38106 |
| Received: | Jan,15,2011 17:10:54 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I strongly believe that certain designated areas in GGNRA should exclude pets such as Fort Miley and huge swats of Ocean Beach. "No Pets" signs should be made visible and available for everyone to see including nighttime. | | |

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| Correspondence ID: | 72 | Project: 11759 | Document: 38106 |
| Received: | Jan,15,2011 18:23:19 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I have seen off leash dogs disturb wildlife in multiple beach areas. Dog owners generally do not obey leash laws so banning dogs from some beaches is for now the only solution to keeping beaches safe for wildlife and make them the peaceful places they are supposed to be. | | |

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| Correspondence ID: | 73 | Project: 11759 | Document: 38106 |
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ID:

Received: Jan,15,2011 18:26:49

Correspondence Web Form

Type:

Correspondence: It is unconscionable that any person or group would want to prevent unleashed dogs from running and playing at Ft. Funston. In all the years I have been walking my dog there, I have never witnessed a fight of even unpleasantness between dogs. Furthermore the owners are very observant about the rules, and they always pick up after their dogs. That's why the garbage cans are full!

Dogs are more than playthings; they guide and protect people. They need fresh air and exercise and Ft. Funston is ideal for that purpose. I don't understand what needs to be preserved there. Ice plants are not attractive! Only the trees contribute to our air, and the dogs do not defecate on trees!

And what about us dog owners? Don't we taxpayers deserve to walk in the beauty of the ocean and the surrounding skyline?

Terrye Wilder

Correspondence ID: 74 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 21:14:38

Correspondence Web Form

Type:

Correspondence: Please keep dog access available. I take my dog to dog-friendly beaches whenever possible.

Correspondence ID: 75 **Project:** 11759 **Document:** 38106

Received: Jan,15,2011 22:21:05

Correspondence Web Form

Type:

Correspondence: I agree 100% with the restricted area's for dogs in the Presidio, Crissy Field area of the San Francisco Bay, it's about time! I love dogs but over the last couple of years its really gotten out of control there, children play in the sand where dogs do their business and run all over the place, while most owners aren't paying much attention. Also, dog fights break out often, causing adult frustration and arguments, I hope this helps the situation.

Thank you.

Correspondence ID: 76 **Project:** 11759 **Document:** 38106

Received: Jan,16,2011 06:58:24

Correspondence Web Form

Type:

Correspondence: I am absolutely taken back that you would even think of not allowing dogs at Muir Beach. What are public areas for if not families and their animals? It seems the more the parks have gotten involved the more you begin to take our personal rights away. I am just amazed and terrified that you would even think that this is o.k. Please Please let us take our dogs to the beach. As a resident of Muir Beach I have never minded when dogs are brought to the beach - why should you?Nancy Heldt

Correspondence ID: 77 **Project:** 11759 **Document:** 38106

Received: Jan,16,2011 12:43:01

Correspondence Type: Web Form

Type:

Correspondence: I believe the rules regarding off-leash dogs should remain as they are today within the GGNRA. I think the areas deeded to the GGNRA by the City of San Francisco should just revert back to the city rather than having any changes made to the existing use rules.

Correspondence ID: 78 **Project:** 11759 **Document:** 38106

Received: Jan,16,2011 13:01:33

Correspondence Type: Web Form

Type:

Correspondence: I have walked my dogs in Oakwood Valley 3-5 times a week for the past 5 years. It is one of the very few places where they can run off-leash. Not only is restricting them on parts of the trail loop a disaster for responsible dog owners, but I question whether enforcing such a law is anywhere near a sane expenditure of funds at a time when California is in such bad condition.

Correspondence ID: 79 **Project:** 11759 **Document:** 38106

Received: Jan,16,2011 13:12:28

Correspondence Type: Web Form

Type:

Correspondence: I was bitten by an off leash "friendly" dog, while running in the park in SF in an on-leash area about 10 years ago. Reasonably, I still have a fear of dogs. I now only run in on-leash areas. However, I really like some of the off leash areas and wish I could recreate there. To make matters worse, many dog owners disobey the law and continue to let their dogs off the leash in on-leash areas. This makes me very uncomfortable and I feel like I don't have the right to recreate without fear. Many dog owners have been disrespectful and aggressive towards me if I ask them to leash their dogs. Some have even threatened me and now I not only don't feel safe because of the dogs, but because of the dog owners.

Ideally, dogs would not be allowed in the park at all as even the sound of a dogs bark makes me jump, and causes my blood pressure and heart rate to rise. However, I there are ways to compromise and suggest the following changes:

1. The existing laws should be enforced and dog walkers with dogs off leash should be ticketed. 2. All dogs should be muzzled everywhere. In particular if they are off leash. 3. There needs to be dog free areas (in my case I would like to see some of these areas in SF). 4. Pit bulls and other breeds that are bred to be aggressive should not be allowed in the park. 5. One owner should be limited to 3 dogs on leash and if in an off leash area, one dog off leash.

Humans should be able to enjoy the parks, not only dogs. Thank you for considering this matter.

Correspondence ID: 80 **Project:** 11759 **Document:** 38106
Received: Jan,16,2011 14:19:36
Correspondence Type: Web Form
Correspondence: As much as I appreciate the effort to keep the GGNRA for the future, I believe it also must be possible to manage the use and enjoyment for all of us NOW including our dogs. I understand the importance of keeping it safe and clean for all visitors and the natural wildlife As a dog owner and regular visitor of the parks with my dog, I also really enjoy the option to let my dog run free without leash, especially at the beaches. Dogs love and need to run to exercise their bodies and release energy which is impossible to do on-leash. I can't run as fast as my dog or any dog. I am able to manage my dog with voice control and believe most dogs can be controlled that way. I probably would restrict the number of dogs private and dog walkers can control without leashes to a maximum of 3. We already live in an area with many restrictions for people with dogs and there are many people with dogs. We need some spaces for our group of citizens as much as we need spaces for people with no dogs. I am not sure whether this counts as a VOTE or how to VOTE for which option? I want to VOTE for Option A! no changes

Correspondence ID: 81 **Project:** 11759 **Document:** 38106
Received: Jan,16,2011 15:18:51
Correspondence Type: Web Form
Correspondence: It's time for GGNRA to finally accept the fact that walking off leash with a dog is a legitimate form of recreation enjoyed by millions of people, one that must be given its fair share of resources.

Correspondence ID: 82 **Project:** 11759 **Document:** 38106
Received: Jan,16,2011 15:19:33
Correspondence Type: Web Form
Correspondence: It's time for GGNRA to finally accept the fact that walking off leash with a dog is a legitimate form of recreation enjoyed by millions of people, one that must be given its fair share of resources.

Correspondence ID: 83 **Project:** 11759 **Document:** 38106
Received: Jan,16,2011 16:11:43
Correspondence Type: Web Form
Correspondence: We have a very well-behaved dog who loves nothing more than a run in the waves at Fort Funston. He is a border collie/cattle dog mix who needs daily physical exertion beyond what our small City yard and local park can provide.

Since we work full-time during during the week, we pay a dog walker to take him out daily with a group of other dogs. This gives our dog both socialization and exercise. Our dog walker is fantastic with the animals, and they respond to his commands exactly as they do to those of their owners.

While it is true that some dog owners are irresponsible, this is no different than some parents. Legislating such extreme restrictions to all dogs and their owners is unfair and unreasonable. We pay taxes and have the right to be able to enjoy weekend trips to the park with our entire family, which includes our dog.

Carmel is a city which allows dogs nearly everywhere. I am unaware of any significant complaints or problems that the city experiences as a result.

Please reconsider this draconian measure.

Correspondence ID: 84 **Project:** 11759 **Document:** 38106
Received: Jan,16,2011 16:16:36
Correspondence Type: Web Form
Correspondence: I strongly object to dogs in the GGNRA. People with dogs have effectively bullied the rest of us out of both our San Francisco city parks and the GGNRA. So much so that I have long since abandoned the use of both. Aside from dog urine and feces, the dogs' barking and wildness have completely wrecked the serenity that I formerly found in the natural world.

Not only have I been attacked multiple times in parks, but have had vicious, rude, and obscene comments leveled at me by dog owners and even professional dog walkers (who make a living abusing our natural spaces but don't pay a dime in their upkeep) in response to my courteous requests to keep their dogs away from me. Most dogs aren't even licensed or registered, so their owners are literally appropriating everyone's resources and giving nothing back. Wildlife reacts negatively to dogs. Not only on beaches, but everywhere that dogs pee on and mark as their own, just as their owners have ganged up on the rest of us and taken our own peaceful little bit of nature.

Whereas I object to any dogs in the GGNRA, I realize that the best I can hope for are dogs on leashes. But they must be rigidly monitored and any violation punished in proportion to the loss to the rest of us. Forget voice command; it's a total fiction invented by dog owners too lazy to socialize their dogs and too selfish to care about the dogs' impact on everyone and everything else. I have yet to see an off leash dog respond to its owner's command. And that supposes, of course, that the owner is even paying attention to what the dog is doing. They rarely are; they're on their phones, or talking to other dog owners, while their dogs are running around hundreds of feet away, defecating and urinating everywhere, and in some cases, chasing or attacking people. As an senior citizen, I feel at risk. My husband has Parkinsons and his walking is compromised. No way will we be in the GGNRA any time soon unless the dog owners are leashed. The majority of dog owners are selfish and irresponsible when it comes to their dogs and the rest of the world. Dogs are a huge liability to people and nature.

Correspondence ID: 85 **Project:** 11759 **Document:** 38106
Received: Jan,16,2011 17:43:08
Correspondence Type: Web Form
Correspondence: General Comments

My family owns a dog and lives in San Francisco. We visit the GGNRA at least once a week. The Draft Dog Management Plan would reduce our enjoyment and use of the park considerably.

In the plan the enabling legislation for the GGNRA is quoted: "In order to preserve for public use and enjoyment certain areas of Marin and San Francisco counties, California, possessing outstanding natural, historic, scenic and recreational values and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area is hereby established". The plan also discusses the long history of off-leash dog access before and

after the creation of the park.

Because open space is so limited in San Francisco, and because the GGNRA controls the entire coastline I strongly support continued access to provide reasonable exercise and recreation for dogs and their owners.

I'm very concerned about the tone of the plan and some of the specific provisions.

The objectives listed in the executive summary all relate to controlling, reducing and restricting dog access. Given the park's charter to provide 'public use and enjoyment' and 'needed recreation open space' an important objective should be to preserve sufficient space for off-leash dog access.

The plan exhaustively lists real and theoretical issues related to dog access however there is no comparable section discussing issues with prohibiting or restricting dog access. These include wasting limited park resources on restricting responsible dog owners rather than cautioning the irresponsible, forcing dog owners to travel further to take their dogs for a reasonable walk and increasing the likelihood of aggression by concentrating dogs in increasingly small designated areas.

The plan also continually discusses dog access in the context of park-wide regulations preventing any off-leash dog walking. San Francisco donated properties to the GGNRA on the proviso that traditional recreation would be maintained. The tone suggests that leash-free access was a mistake, and that the park service is begrudgingly fulfilling the park's mission only when forced to do so. I'd have much more confidence in the process if the plan started from the position of accepting a variety of recreational activities, including off-leash dog walking, and then attempted to balance the varied needs of visitors, culture and wildlife from there.

Given this I find the adaptive management provision of the regulated off-leash areas (ROLAs) to be unacceptable. This provides the NPS with a mechanism to further erode dog access to on-leash only and even to prohibit dogs entirely without further consultation. The plan further states that under no circumstances will the reverse be true ? once dogs are banned the park will never consider opening up access again. This is a far greater threat to preserving the park for future generations than any amount of dog access.

Rather than penalizing the vast majority of responsible dog owners the Dog Management Plan should focus on enforcing existing rules and regulations.

Below I discuss the proposed plan for the sites we visit regularly:

Fort Funston

The preferred alternative is far too restrictive. When the closed section of trail to the north of Fort Funston is open again there should be off-leash access for the full length of the beach and alongside trails so that a loop can be made down the sand ladder and then returning via the central or northern access trails. Of all the GGNRA sites Funston would seem to be the best candidate for Alternative A ? maintaining current access ? especially if the preferred alternative is selected for restricting most of Ocean Beach. We visit Fort Funston weekly, rain or shine, and given how heavily the area is used I'm surprised at how rare it is to encounter any problems.

Crissy Field

The preferred alternative is a good balance. When the east beach is busy there can be far too many dogs and people competing for space. For this reason we usually visit Crissy field when the weather is too severe to walk on an ocean facing beach and so it tends to be just dog walkers anyway.

Ocean Beach

The preferred alternative is reasonable, provided that Fort Funston is not overly restricted (see above).

Marin Headlands / Rodeo Beach

The preferred alternative massively reduces the trail available for hikers with a dog. We often complete the loop up the coastal trail to Hill 88 and then down Wolf Ridge / Miwok to return to Rodeo Beach. The trails are rarely crowded and a well behaved dog has no more impact than a person. The Hill 88 loop should be kept open to off-leash dogs. The preferred alternative for Rodeo Beach is acceptable.

Correspondence ID: 86 **Project:** 11759 **Document:** 38106

Received: Jan,16,2011 23:28:15

Correspondence Type: Web Form

Correspondence: As a disabled person and a dog lover, I strongly urge that GGNRA continue to be open to well-behaved dogs under voice control. Existing laws, such as the restrictions on dogs at certain areas of Ocean Beach, are more than enough to protect the environment og GGNRA. My personal health and well being are enhanced by my walking the beach with my dog, who provides both help and motivation for me.

I have spent countless hours in the GGNRA with my dog and have NEVER

observed my dog or anyone else's harm the environment or detract from a fellow citizen's enjoyment of this national treasure.

Correspondence ID: 87 **Project:** 11759 **Document:** 38106

Received: Jan,16,2011 23:59:24

Correspondence Type: Web Form

Correspondence: While recognizing that more and more people, as well as pets, create complications, I fully support a dog owners' and a dogs' right to enjoy our parks, walkways and exquisite beauty of the bay area. Dogs make us all happy, just to see their joy and to watch them interact with people, animals and life itself.

If they are banned in any way, there will be less joy and we will be lonely without our beloved creatures around us. I do not have a dog, but am thrilled to see them when out walking. They are every bit as pleasing as people, with individual and unique traits. They make their own friends along the pathways and greet those people that they like whether on leash or not. They beam their greetings to those of us who love and cherish the animals of the planet. Humans have a brotherhood with dogs.

I do not support pitbulls in public, as the one exception. That is because they have proven to be dangerous and lethal to so many people. Pitbulls are outlawed in Canada, while other dogs are not. They cannot be trusted and should not be allowed to attack other beings. All dogs cannot be placed in the same category and all dogs should not be punished because pitbulls are out of control.

I rejoice in the presence of canines and find that life would be cold and unbearable if we were not able to see and interact with them on a daily basis. Will we next ban butterflies, hummingbirds, ladybugs, felines and other life forms that create magic and give us reason to live?

Our dogs are our friends and family. If they cannot behave politely around others, they should be on a leash. Many dogs act intelligently and make no problems and should therefore be allowed to walk free of confinement.

Can we not let life express itself? Must we take all freedoms and comforts from life and live in barren landscapes with no love?

Thank you for your consideration,

Jean

Correspondence ID: 88 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,17,2011 00:15:15**Correspondence** Web Form**Type:****Correspondence:** Dear National Park Service,

I am a native of the San Francisco Bay Area and a lifelong dog lover and owner. I recently read the draft dog management plan and I would like to comment. I fully support conservation efforts but I also think it is necessary to recognize the fact that a large portion of the land in question has been used for a number of years as dog accessible land. I would like to request that the competing demands to conserve the land be balanced with the need to maintain the availability of dog accessible land.

My concern if the lands are closed to dogs or the access for dog is limited is that the amount of available land for dog exercise in the San Francisco will go down significantly. Additionally, placing limitation on the lands in question will push the dog traffic onto other land that currently does not have dog impact.

For instance, Fort Funston which I regularly visit with my dog has proposed dog use changes. I believe that changing the rules at Fort Funston will push dog traffic onto other lands. It would be better to leave the existing lands open to dogs with minor changes as needed to meet conservation goals than to make drastic changes.

Please do not close or limit dog access in the areas proposed.

Thank You, Ryan Jones

Correspondence 89 **Project:** 11759 **Document:** 38106**ID:****Received:** Jan,17,2011 10:21:39**Correspondence** Web Form**Type:****Correspondence:** The San Francisco Bay Area has always been a famously dog-friendly environment. It is part of the reason my family and I decided to move here. We have had many rich and rewarding experiences taking our dog out to Crissy Field, Fort Funston and other beautiful outdoor spots for years. Our dog is taken to Fort Funston everyday by his dog-walker and he has become a more socialized and better behaved dog because of that.

If our dog's ability to get natural exercise in an outdoor setting is compromised I truly believe that his, and thereby my families', quality of life would be severely affected in an adverse manner. We all benefit from the exercise and the community involvement we experience when gathered

with other dogs and dog owners in beautiful surroundings. It truly is one of the things that makes this such a special place to live.

There are plenty of places for the public to gather where dogs aren't allowed. I implore you to keep in mind the wishes and desires of those of us who own dogs. Please let us keep our open spaces to let our dogs run free.

Correspondence ID: 90 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 10:59:38

Correspondence Type: Web Form

Correspondence: Enclosed off-leash areas seems to me the only tenable solution. I used to live in San Francisco and would frequently visit Fort Funston or Chrisy Field. I loved walking in these areas and mostly enjoying watching the frolicking dogs. BUT... most times I visited, I saw some kind of undesirable behavior from the dogs (ex. fighting with other dogs) or their owners (ex. not picking up feces or not paying attention to their dogs). As such, I will never bring my young child to either of these beautiful PUBLIC places. I think it's very unfair the desires of dog owners are allowed to dominate over those of children and parents - especially when enclosed dog run areas are a perfectly workable compromise.

Correspondence ID: 91 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 11:02:11

Correspondence Type: Web Form

Correspondence: Fort Funston is our puppy's idea of heaven. We have been going to Fort Funston and Crissy Field for over 14 years, and have be impressed by the sense of responsibility and consideration demonstrated by 95% of dog owners. Example: we have rarely found excrement in the parks, because owners are prompt and conscientious about cleaning up after their dog. Dog owners are attentive to their pets, and willing to leash dogs when/as appropriate. We always respect the Snowy Plover restrictions because there is so much other space available, and because we are also ardent conservationists.

Off-leash dog areas are few and far between, and dog owners, grateful for those that do exist, are eager to ensure that these areas remain in good condition.

Please do not diminish opportunities for dogs to experience the freedom and beauty that their owners are happy to enjoy and share.

Correspondence 92 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,17,2011 11:04:54**Correspondence Type:** Web Form**Type:**

Correspondence: I support having dogs in *fenced* areas in the GGNRA. This would allow people who do not want to interact with dogs to avoid them, while giving people who *do* want to be with dogs a place to go and play/exercise with them. The current state of affairs in the GGNRA is that there are too many out-of-control dogs there, and too many dog walkers who have so many dogs on leash at once that the "pack" blocks the path for ordinary walkers. We all have a right to safely use this national park, it's not just for dogs.

Correspondence ID: 93 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,17,2011 11:05:33**Correspondence Type:** Web Form**Type:**

Correspondence: While I understand the Preferred Alternative C tries to balance all interests, it does not make sense to me to say we know a safer alternative exists, but choose a more UNSAFE alternative as the preferred plan.

Alternative D is really the best in the long term. A safe experience in the GGNRA will be the most important and memorable for visitors. This is especially true for children. One experience with a badly behaving dog can last for a lifetime.

Steve Frankel

Correspondence ID: 94 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,17,2011 11:06:13**Correspondence Type:** Web Form**Type:**

Correspondence: Thank you for being on the KQED show on this topic.

My husband (a scientist at Stanford) and I (a bestselling author and longtime community volunteer) love dogs.

We do not, however, love

smelling dog poop on a hike being unable to sit on the ground because of dog poop/pee watching dogs destroy habitat watching dogs chase birds

For these reasons, we have stopped visiting Fort Funston. Just thinking about it makes me feel nauseated from the poop smell on the trails.

The dog owners who are not mindful of their dogs will always spoil it for the responsible dog owners. Nothing will change that.

They cannot manage themselves or their dogs, so the environment must manage them. That means NO dogs at Crissy Field, or at best in a contained, fenced in area.

Thank you

Correspondence ID: 95 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 11:06:20

Correspondence Type: Web Form

Correspondence: We share the planet. People who do not want to be around dogs want it all. Their reasoning is, if they take their children to a dog designated off leash area, and there's trouble, the dogs should go. Cramming thousands of dogs into smaller spaces is going to create more impact on the landscape as well as more dog-related incidents. Dog owners would have more space in which to walk their dogs, not less. Non-dog enthusiasts have the whole coastline. In addition to being about dogs, this is also about people with dogs, people enjoying nature with their canine companions. I think the land GGNRA now stewards should be given back to San Francisco. I'd also like to know why GGNRA leaves dead carcasses of seals, birds, and fish to rot on the beaches???

Correspondence ID: 96 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 11:08:43

Correspondence Type: Web Form

Correspondence: Dogs should be kept on leash in areas where other people, birds and plants are located. I'm a resident of Duboce Triangle, where the park has a large off-leash dog section and a smaller space for people and dogs on leash. The rules are painted on sidewalks, but the majority of dog owners ignore the rules and allow their dogs to remain off leash after they leave the dog-appropriate area. This results in lots of dog feces & urine in the spots where people like picnicking as well as dogs roaming into and disturbing people who are resting, eating or trying to relax in the "people only" area. I think that fences are the solution. This prevents the impact of loose dogs' negative behavior from being imposed upon the public. Large, fenced-in area where dogs may run off the leash. This area should be separated by impermeable fences so that any humans who wish to enter must make the choice to do so. This will reduce dog feces that off-leash dogs create and also reduce the number of times that dog's behavior negatively impacts children, adults, and other animals.

Correspondence ID: 97 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 11:09:17

Correspondence Type: Web Form

Correspondence: This plan removes a recreation opportunity (off-leash dog use) from the spectrum of offerings at GGNRA and this approach is overly restrictable and regrettable, particularly as dogs are becoming more and more common as companions, and norms for acceptable dog behavior are improving.

In my estimation as a recreation resource planning consultant, the area at Crissy Field is a human-created, urbanized landscape that is appropriate for large off-leash dog areas. Ask any large dog owner about small, fenced dog areas and you'll hear they are entirely inadequate.

I would simply suggest that the plan be implemented with triggers for increased restrictions (e.g. reports of incidents/injuries) similar to the Limits of Acceptable Change planning process. While issues related to public safety are important I think that the SF dog/human community is affiliated and active enough that off-leash, non-fenced areas should be workable.

Best of luck in working with a difficult issue! Thanks for all your hard work, NPS staff people!

David Rolloff, Ph.D. Associate Professor of Outdoor Recreation California State University, Sacramento

rolloff@csus.edu

Correspondence ID: 98 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 11:11:15

Correspondence Type: Web Form

Correspondence: As a fairly new comer to the area (previously I have lived in Massachusetts and Tennessee), I find it a shame that these dog restrictions are being considered. The beautiful recreation/parks available to dogs is one of the unique and diverse aspects of this amazing state, and because these areas are open to and welcome dogs, it is the main reason my husband and I visit these areas. It is a shame, because if these restrictions are put in place - I do not feel that we will enjoy these areas anymore - as we tend to only visit parks/recreation area with our dogs. I understand that wildlife and other non-dog visitors must be held high in this decision process, but I would very much like to see less-extreme restrictions on dogs put into place.

Correspondence ID: 99 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 11:11:28

Correspondence Type: Web Form

Correspondence: I would like to urge you to adopt (D) ["Allows for the highest protection of "natural and cultural resources" and visitor safety] for the following reasons:

1) On- and off-leash dogs present a danger and an annoyance to children. We have a 4 year old and a 6 year old who love to hike in the woods, visit the beach, and generally enjoy the outdoors. The six year old, who has a sensory-processing disorder, is very afraid of dogs after being repeatedly chased and jumped upon by dogs while hiking. While a majority of the dogs are trying to play, it doesn't appear like that to a small child.

My requests to "please control your dog -- my child is afraid of dogs" is consistently met with assurances by the owner, from a distance, that the dog is safe. The assurances, which always include the phrase: "don't worry - he's/she's friendly" provide no comfort to a small child.

Additionally, dogs sometimes bark loudly at my children and we have had, on two occasions, dogs bare their teeth at our child. It is too dangerous to allow dogs in a public place with children.

As a result of this constant harassment we are no longer free to enjoy areas of the GGNRA that permit dogs in any way.

2) Dogs often run off trail through poison oak. I am very sensitive to poison oak. Having a "friendly" dog "say hi" is a real problem and ruins my visit to the park as I have to concern myself with whether the dog has poison oak on its coat after it has rubbed me.

3) Dog owners leave feces on trail or off trail on bags. This is unsanitary and disgusting. Leaving plastic bags by the side of trails for someone else to clean up is littering pure and simple -- just as if I were to throw an empty water bottle or empty bag of Doritos. We do not need more sources of pollution in our treasured parks.

4) Dogs consistently harass the fragile wildlife in the parks. Dogs enjoy chasing animals, especially birds, in the parks. I often also see dogs in streams and rivers. This is their nature-- they are not trying to misbehave; this is what dogs do. To maintain the natural resources dogs must not be allowed in the parks.

Again, I urge you to adopt (D) ["Allows for the highest protection of "natural and cultural resources" and visitor safety] for all the lands within

the GGNRA.

Correspondence ID: 100 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 11:15:39
Correspondence Type: Web Form
Correspondence: I am a long-time resident of San Francisco--a middle-aged woman with pets, and an active volunteer for a local animal welfare organization.

I AVOID and DO NOT USE Chrissy Field and other areas of the GGNRA which are overrun with off-leash dogs. It is scary, annoying, and full of dog poop. I know others who feel the same way and completely avoid those areas. By allowing off-leash dogs in areas of the GGNRA, you ELIMINATE those areas for use by people who are seeking a quality recreational experience--including very young children, the elderly, the handicapped, and people like me, who just like peace and quiet and views.

There is no such thing as reliable "voice control" for any but the most highly-trained dogs (e.g., military and guard dogs). Dog owners who believe they can stop their family dog fifty feet away from jumping on a toddler, chasing down a bird, or attacking another dog are delusional. It's not fair to the dog, and it's certainly not fair to those impacted by the dog's natural behavior. There is no right or entitlement to let your dog run free on any land but your own--not on public lands.

If the GGNRA chooses to establish fenced, contained, off-leash dog-run areas (preferably segregated by dog size), that's great. Otherwise, all dogs in the GGNRA should be on a leash. I prefer Alternative D in the EIS.

Thank you for considering my comments.

Correspondence ID: 101 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 11:19:41
Correspondence Type: Web Form
Correspondence: I strongly disagree with any further restrictions on dogs and dog walking in the Golden Gate National Recreation area. I am not a dog owner, but I feel that the current restrictions are already stringent enough.

Correspondence ID: 102 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 11:29:19
Correspondence Type: Web Form

Correspondence: I am writing as a non-dog-owner. I like dogs and grew up with one on a farm in the Midwest, but I find that the use of public space by urban dog-owners presents a number of vexing issues. I wonder whether any study has been done on the increase of dog ownership among people in densely populated urban areas, whether a limited number of licenses should be issued, for instance. Because public spaces in urban areas ought not be taken over by dogs, something that quickly and easily happens because of the nature of that species. But that's perhaps an issue for another discussion: the overpopulation of urban areas with dogs.

More to the point: the insistence that I have heard from dog-owning groups that fenced-in spaces are not feasible exercise spaces has never been adequately explained or defended as far as I can tell. I listened to a radio program on public radio this morning, 1/17/2011, in which one of the leaders of the dog-owning group kept insisting that fenced-in areas would be unacceptable to her group, but she never gave a reasonable explanation as to why. A fenced-in area can be large enough to serve the desired purpose. Fenced-in areas for dogs are a must, in my opinion. Responsible dog-owners may be legion, and they are always the ones speaking on behalf of organizations, but I have experienced plenty of irresponsible dog-owners. "Under voice command" may be a real thing in dog training, but in many actual cases it is simply another way to say "no control," because many people have no voice control over their dogs, or at least, they do not exercise control. Poop bags are used by the majority, but even a minority of non-poop-bag users creates a noxious environment. As a jogger I have been chased by dogs, a dog has jumped up on me with muddy paws and scratched me with a dirty claw, I have been scolded by a dog-owner because I allowed my son to ride his bike on a trail shared with dogs (she said that her dog was nervous and became aggressive when he saw people on bikes and often wanted to chase them). It seems evident that dog-owners (such as the woman I mention in the last case) feel that the right to have dogs "under voice control" in a shared-use area makes dogs the dominant species in the park (we have to alter our behavior to avoid making the dog nervous or aggressive). Simply because dogs are what they are, they have a tendency to dominate and over-run any area where they are allowed to run free.

In the East Bay we have Point Isabel, where there is a large off-leash area that is also fenced off from the jogging path. There I have had great experiences as a jogger and cyclist, protected from curious and/or aggressive dogs but also able to watch them at play, which I enjoy. I think you should ignore the people who insist on no compromise. Areas used by dogs are inevitably less accessible to non-dog-owning humans, especially vulnerable ones like children, the disabled, the elderly, and the cynophobic (people afraid of dogs, of which I have several in my group of friends). My opinion, simply put: people and protection of environment must take precedent over rampant dog use of parks. And dogs, in this equation, are not

counted as "people."

Thanks for your attention.

Correspondence ID: 103 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 11:33:55
Correspondence Type: Web Form
Correspondence: I am a dog owner. I clean up after my dog, and keep her under voice control.

For decades I have been taking my dog to Muir Beach (I have been a dog owner in Marin since 1937). It is a happy scene, with many dogs and very few incidents of distress. Far better to let the dog owners work out a system of monitoring the situation than to ban dogs altogether.

Many people need dogs. Their dogs are a major element in a peaceful, sociable life.(Note the dog programs in prisons that reduce violence by something like 30%.) Dogs NEED to run---at least most big dogs do. The dogs will be nervous and unsafe if constantly keep under restraint.

Dog parks are insufficient for exercising dogs. Not all dogs are sociable enough to exercise in crowded spaces.

GGNRA has made it impossible for me to walk from my home in Mill Valley to the beach, unless I walk on the roads (very unsafe). Surely at least some of the trails (Diaz especially) should be available for a dog on a leash!

Of course, much worse than the situation in Marin County are the San Francisco restrictions. For shame, practically outlawing walking one's dog. On leash does not count for many dogs. I would expect lots more dog violence with this plan.

I hope you review this program and make allowance for Man's Best Friend (have birds ever been considered Man's Best Friend?). With thanks for your consideration, CM Kun

Correspondence ID: 104 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 11:42:24
Correspondence Type: Web Form
Correspondence: Firstly, I would like to say that this website and process was very hard to negotiate and understand. After spending an hour looking over the document I still don't really understand what exactly this plan is proposing. Given that, as a dog owner, I would like to comment. Open space (not

fenced) off-leash dog areas are very important to me. I take my dog to Crissy Field, Ocean Beach, and other open areas. Some times I have my dog off-leash and sometimes I have my dog on-leash. My main comment is that as a responsible dog owner I am very careful about how I use public areas and those areas are very important to me, my health, and my dogs health. On the other hand, I do see really irresponsible behavior of dog owners all the time. It is frustrating to me that I will be negatively impacted by others bad behavior. I feel that it is a given that regardless of how restrictive you get about off-leash laws, people who are irresponsible will do what ever they want anyway. Because of this I would request that rather than make more restrictions and laws, you step up enforcement and fines of people who are acting irresponsibly. In my own interest I would like to request that at least Chrissy Field Beach remain off-leash. I was under the understanding that when tax dollars were spent to re-furbish that beach that it was intended to be an off-leash spot. Thank you.-

Correspondence ID: 105 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 11:46:50
Correspondence Type: Web Form
Correspondence: where dogs & people mix use leashes voice control is not 100% when park is closed hose down the dog urine keep dogs away from nests burrows no digging over population problem

keep some areas dog-free rotate over years with dog/dog-free park areas

Correspondence ID: 106 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 11:48:11
Correspondence Type: Web Form
Correspondence: We are occasional users of the GGNRA Park (typically Fort Funston with our two Finnish Lapphunds - medium sized herding dogs) and annual contributors to Golden Gate Park (\$250/year). We contribute an equivalent amount to Yosemite, where our dogs are precluded from joining us and as a result, we rarely visit even though it is a favorite spot. Our dogs are under effective voice control and will not enter habitat protection areas. There are too few places in the region where they can run, play and socialize with other dogs.

I can not effectively comment on the majority of the Maps/alternatives having not visited with our dogs.

I can comment on Fort Funston and my preference would be a variation of Map 16-A and the Preferred alternative. Generally voice control as the

priority with Seasonal closures, except for a boundary area along Skyline, to preclude car/dog accidents. I have never seen any real problems at this area, dogs for the most part know how to work things out. If there are issues, it is with owners. Problems, if any, typically originate when there is a dog on a leash (restricted maneuverability and therefor potentially vulnerable/fearful) and a free running dog which precludes them from safely working things out in terms of dominance within the "pack".

In terms of multiple use, as described on the KQED Krasny show this AM and concern about service dogs, they have the run of every Park location. I do not see the need to restrict every location to meet the needs of the .001% of the population that requires their assistance. They already are able to enjoy the majority of Park areas that "regular" dog owners are precluded from. Fencing, if required, around habitat protection areas makes sense.

If it generally becomes significantly more restrictive in terms of dog access, since I have seen little evidence that the current situation is broken, my solution will be simple ... no longer visit and no longer contribute funds.

Good luck trying to resolve what is clearly an emotional set of issues.

Correspondence ID: 107 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 11:51:30

Correspondence Type: Web Form

Correspondence: As a fervent supporter and user of our national parks, and a regular financial contributor to both the California state park system AND the GGNRA, I was dismayed to hear about the new proposed dog regulations on this morning's Forum program.

As an avid hiker, any semi-decent day typically finds me hitting a trail either up in the Sierras, or in any of the beautiful wild areas around the Bay. When my yellow lab came home five years ago, I envisioned the two of us taking long hikes throughout the mostly empty trails that I had typically wandered. What I had NOT realized, however, was how incredibly restrictive most Bay Area parklands are towards dogs. Not just leashed dogs - but ANY dog presence at all.

I basically don't visit the Peninsula anymore - formerly a frequent stomping ground for me - as there are essentially just a handful of trails that I can even take my dog on - leash or no. Perhaps a 1 or 1.5 mile leash trail with a square block of offleash area for Lucy to sniff around. Not quite up to the 6-8 miles hikes we're looking for. I don't visit national parks anymore - besides contributing financially to them, as I don't want to spend my time

stuck in a paved parking lot.

The ONE thing for which I have been grateful has been living near the Presidio and the GGNRA. Having lived in this area for almost 20 years, and being a frequent visitor to the Presidio before it was turned over the NPS, I was frankly worried. Would the NPS manage the park properly? Would they sell off pieces of property or buildings that would destroy some of the national beauty of the park?

But what I've seen has impressed me. Yes, some of the rough trails that used to be "secret" are now graded and full of tourists, but overall, the park has done an incredible job of developing and redeveloping the areas. On Sunday, as Lucy and I did our favorite loop through the Presidio, ending up down on Crissy Field for a beach romp before heading back to the car, I thought to myself how lucky I was to live near a beautiful area that allowed me to spend the day wandering with my dog. I gave kudos to the NPS and to SF for allowing dogs and working to keep the area open.

So I was surprised and dismayed to hear the radio show this morning, and in looking through the proposal to see the vast restrictions on dog access to this area and to other areas in Marin (where I've been forced to go now that most areas of the Peninsula are off limit to us now).

As a responsible dog owner, I DO get that not everyone likes dogs. I get the need to balance the disparate needs of the population. I get that some areas that I love my have to be banned due to sensitive habitats. And unlike some, I could see and would not oppose some dog restrictions on Crissy Field (such as restricting dogs to the middle part of the beach). What I'm more concern about is what appears to be wholesale restriction of dog usage generally across the GGNRA - leashed or not.

Where can a person who wants to go for a good six mile hike on a sunday take their dog in the Bay Area? Taking my dog to an enclosed dirt area filled with poo and skittish dogs is not her idea of fun and certainly not mine. The reason I live in SF, pay exorbitant local and state taxes, contribute to the parks system despite decreasing service levels and increased closures, is that I appreciate my ability to access them and believe generally in their mission. But now I'm not so sure.

A couple of things to note about the plan:

- 1) Fort Funston - requiring folks to leash their dogs on the sand ladder to Fort Funston is quite frankly dangerous. Clearly the writers have not walked up and down that ladder very often. It's very steep and frequently eroded - thus making it a slope. I believe that if dogs were leashed, you'd have quite a few more people taking spills head-first as their dogs eagerly pull them

down. If the concern is to keep dogs from romping on the hills, then simply restrict the dogs to inside of the fence.

2) Marin Headlands - Oh look - you've left me 1.5 mile flat fire road past the porta potties that I can take my dog - yeehaw. As i move to my wheelchair, this will come in handy i suppose. But for now, until Lucy and I lose the ability to actually use our legs, we'd love to be able to access a hill. Any hill. Anywhere.

I understand the challenge you all face in meeting the demands and requests of multiple constituencies and fulfilling your overall mission, but please please PLEASE do a better job of allowing parklands access to responsible dog owners. Surely you are capable of managing the land and being respectful of the wild areas without banning all of them entirely to pet owners or limiting us to the parking lot and semi-paved trails. In a city with more dogs per capita than children, it would seem that the park system has a vested interest in gaining pet-owner support and working to have them become advocates of the parks, not antagonists.

Correspondence ID: 108 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 11:52:28

Correspondence Type: Web Form

Correspondence: The current system works well and I support no substantive changes. I am particularly concerned about preserving Muir Beach and Ocean Beach to off-lease usage.

If the concern is irresponsible dog owners, the emphasis should be on greater enforcement of current rules. If owners are forced to leash their dogs, the most responsible owners will comply and the irresponsible ones still will not. Owners with aggressive dogs should be individually sanctioned and forced to leash their dogs.

Correspondence ID: 109 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 11:58:52

Correspondence Type: Web Form

Correspondence: Your outcome shall effect not just your region but other areas that are being destroyed by reckless dog owners...

My simple plan is to gate and fence areas surrounding a park area (circumferenced areas) so people can walk the distance around a park without interfering with others and dog people with leashed dogs. Let's take a portion of golden gate park a.d make part of it devoted to offleash dog.park

taking the traffic away from sensitive areas.....(stupidly pt isabel was planned to be adjacent to a bird sanctuary)...whoever did that must be sitting on their brains....!

I am and have always owned dogs...I realized there will always be irresponsible dog owners ...you must place your laws to protect the wild life by any means to take the worst human activity and violators into account...not the responsible ones..the dog walker association. Is the most vocal because of their political pull...but they are a minority voice ...they are not necessarily being rational....people once given privileges don't normally want to backpeddle...I love my dogs and love to walk them offleash but also know we need to protect what's left of our environment ..fences should be put up to protect environmentally sensitive areas near beach areas from all human traffic...I use the American river to walk my dogs and there are many off leash people responsible and irresponsible walking...you are right its not the #dogs causing the problems but the dog owners...these people that are dog walkers are not all great people are not altruistic agenda...but influenced by a very well organized group of people who make their living walking dogs...and dont want anyone prohibiting them from their new found livelihood...make sure you are aware of this when judging what they say to you in their defense..on the hand I am a member of the point Isabel dog org. And work together to keep that off leash area clean and help police and rangers keep an eye on activities there. I however seen a lot of dogs allowed to Chase and disturb the wild birds feeding and resting on threstricted areas which are not being watched closely by rangers art all....Is there a reason why the dog walkers can't walk dogs in Presidio and goldengate park? Can they be given an exclusive area of beach like parts of north beach to walk dogs? Thanks for listening go out there and start giving out tickets to violators and also unlicensed dogs!!!

Correspondence ID: 110 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 11:59:10
Correspondence Type: Web Form
Correspondence: Comment on GGNRA Dog Management Plan: I agree with the proposal for Milagra Ridge (Map 18). Please KEEP this park leash only, and do not listen to anyone wanting to extend the dog-allowed part of Milagra Ridge beyond the paved road that runs through this park. It is a locked gated road so there is practically no vehicular traffic to worry about. There are relatively narrow unpaved foot trails in the park which are used by small native slithering/crawling/burrowing animals and a few (feral?) rabbits, so these foot trails should be kept off limits to dogs. To protect this wildlife, leashed dogs should not be allowed in these unpaved foot trails, besides the fact that it is difficult to manage a leashed dog on these narrow trails, given the foliage bordering them. It would also be more difficult to pick up after a

dog on these trails. Unleashed dogs will go into these trails so there should be no unleashed dogs at this park. I live next to this park and see that virtually all dog owners who come to it seem quite used to the idea of leashing their dogs. Thank you. Jim Sarbeck, Pacifica

Correspondence ID: 111 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 12:00:13

Correspondence Type: Web Form

Correspondence: I feel that the public would be best served if the Golden Gate National Recreation Area took it's cue from every other national park and did not allow any off-leash dogs. We need an enforceable, consistent regulation to allay the disproportionate negative impact that off-leash dogs make on the ecosystem; they damage plants, chase birds, leave feces, and harass other creatures, while potentially destroying the endangered species that abound in this park. Off-leash dogs intimidate visitors without pets, people who bring leashed dogs, and small children. People and small dogs can be harassed and hurt by exuberant off-leash dogs who don't know their own strength.

Keep dogs on leashes--this will result in more enjoyable recreational opportunities for everybody.

Correspondence ID: 112 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 12:36:31

Correspondence Type: Web Form

Correspondence: I fully support the restriction of dogs, even leashed dogs, in the parks. I am retired and spend much of my free time hiking and much of that is in the parks. It is all too common now to find dogs running wild, non-responsive to voice commands. They tear thru the brush off trail, chasing each other as well as anything that moves. At Chrissy Field they terrorize the birds. It is often difficult to dangerous to just take a walk at Chrissy Field with the hundreds of dogs. It is not at all unusual for people to have two or more dogs at a time running off leash. There is no way you can stay on top of that many dogs or clean up after them. I cannot tell you the number of walks/hikes that have been ruined for me after stepping in dog feces. My friends who have small grandchildren have to be very careful where they take the kids because many of the smaller ones are frightened of dogs. I believe there are sufficient dog parks scattered thru out the Bay Area that can accommodate dogs, particularly off leash.

Correspondence ID: 113 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 12:39:47

Correspondence Web Form

Type:

Correspondence: Hi There- I just wanted to request that you please allow for some beach access for dogs off leash. My dog has arthritis and one of the best forms of exercise for his condition is swimming. Running on hard ground puts too much pressure on his tender joints. There are no dog friendly pools, & I understand that some areas of the beach access may be cut off for off leash dog walking. I'm OK w/ that if its for the greater good. However, please allow for some area for dogs to swim. Another though I had was - perhaps you could partner w/ a dog trainer that could give classes to teach dog (and person) how to act responsible and considerate in the park. & maybe give certificates that would extend the off leash area for those specific certified dogs & person. Best regards, Jennifer Duetting

Correspondence 114 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,17,2011 12:41:37

Correspondence Web Form

Type:

Correspondence: I live near the Park, and use it frequently. It is my opinion that the only off-leash dog walking should be in fenced areas. There are times that the Park is crowded, and off-leash dogs are a hazard. Voice control is not adequate. I am particularly concerned about the very young and very old.

I do not think that dogs should be allowed on the same beaches as young children play. Babies touch the sand and then their mouths, and there is a danger of e-coli, etc. even if the actual piece of poop has been picked up.

Both the young and old are in danger of being knocked over, even while the owner is calling the dog.

I understand that the proposed plan restricts dogs to certain areas, but they are not enclosed. They should be enclosed, and that should be the only place that dogs off leash are permitted.

Many cities have such dog parks, and everybody is happy.

Thank you Evelyn Jurow BTW, I heard about the plan in many ways: friend, newspaper, radio, NPS

Correspondence 115 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,17,2011 12:50:52

Correspondence Web Form

Type:

Correspondence: This report appears to be far from complete. I for one am confused on the rational for suggesting all of Ocean Beach should be closed to dogs on and off leash. If the rational is to protect the snowy plover, why then is the beach not open in the summer months when the snowy plover is gone? Also, why not just keep it as is as an on leash only area during the months the bird is around? Additionally, if it really is an environmental concern, why do rangers drive their SUVs up and down the beach? Why are bonfires allowed? Why are the homeless allowed to camp? Why are revelers allowed to drink and litter the beach with their empty beer cans? Why is there no attempt to keep people from shooting fireworks off at the beach? There are so many things that the GGNRA is already failing at, please do not take the senseless action of banning all dogs from Ocean Beach.

I live one block from the beach and walk my dog regularly on the beach and it will be tragic if my dog is not allowed on the beach. The beach will become useless to me and my family. We will be forced to take walk our dogs on the paved path, which in turn will increase the potential for accidents to occur. That path is frequented by bikers (traveling at high speeds), joggers, walkers etc. Combine the increase in traffic and the narrow width of the path and you will see more dogs acting out at humans, more bike accidents/personal injury claims as they try to avoid the congestion, etc.

Did anyone who created this report consider the impact to the SPCA and ACS? By making dog ownership more difficult I would imagine adoptions will decrease and thus more dogs will be put down. An assault to human morality and fiscally a sure cost increase.

The other aspect sometimes presented as a rational for the closure is to make the area more accessible to non dog users. I'm not sure why a person would not be able to use the beach if dogs were allowed on leash. Is the goal to make the beach better for a group of people who will use the beach two days a year at the expense of those who use it daily?

Please, please, please, do not tell a member of my family that he cannot walk on the beach with me.

Correspondence ID: 116 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 12:58:59

Correspondence Type: Web Form

Correspondence: I fully support the proposed plan; however, I have the following comments in support of more restrictive dog use within GGNRA:

1. San Francisco is an international city, and far more people from around

the United State and the world visit GGNRA than locals. These park visitors also deserve a voice, not just vocal local dog owners. Unfortunately, the voices of local dog owners will undoubtedly unfairly bias the overall number of comments GGNRA receives, smothering the legitimate opinions of countless other citizens who visit GGNRA less frequently. If GGNRA policy makers were to solicit the opinions of these out-of-town visitors, say, through on-the-spot visitor surveys, they would perhaps have much broader basis upon which to justify their proposed plan. Again this issue affects all Americans, not just those who live in the local area. GGNRA is a NATIONAL recreation area.

2. Dog owner groups argue for "voice control". One does not need to be around dogs for long to know that this is little, if any, control at all. Dogs will obey only when they are not distracted. I have been approached and jumped on numerous times by "well trained" dogs that have disobeyed their owner's voice commands. Let a bird land, or any other wildlife happen by, and the distracted dog is completely out of control; hence, the reason for lease laws in our National Parks.

3. Dog owner groups claim dog problems are due to a small minority of (off-leash) dog owners. This might be true; however, it doesn't take but a few mismanaged dogs to disrupt or victimize lots of visitors. At times, a single abandoned dog poop on the beach or trail, can be witnessed by literally hundreds of Park visitors. On one occasion, I witnessed a dog pee on someone's kayak on the Crissy Field beach, and I have witnessed many people being approached and touched by these so-called controlled "friendly" animals, besides me.

4. When my local community created a dog park, the number of dog problems along the city streets and along the waterfront trails diminished enormously. As a result everyone is better able to enjoy our extremely scarce urban park resources. Even so, I still cannot walk along the nearby waterfront trail without finding dog poops, even within a hundred feet of complimentary poop bags and garbage cans.

5. Within an enclosed dog park, dogs are able to run free, their owners are able to socialize with others of like mind, the owners police the area, and most importantly, their pets do not disturb others. Our local city dog park is proof of that!

6. Dog owners claim that the amount of GGNRA area where dogs are allowed off leash is small compared to the overall GGNRA area (I've heard less than 1%). Were the comparison made to GGNRA beach area, however, the statistic would likely flip flop. Such unrestricted use by a few dog owners is blatantly unfair to the remaining majority of us GGNRA users

who seek a more natural outdoors experience.

7. Dog owners often sling yellow tennis balls into the bay for their pets to chase. Invariably, the dog tires of this sport, and the tennis ball floats away. I have retrieved these yellow tennis balls along remote beaches on almost every outing. This practice of throwing balls into the bay for dogs to chase should be strictly forbidden.

8. I constantly hear the term "responsible dog owner" used to describe city apartment dwellers who own large dogs. Clearly it is irresponsible to own such a dog in the city if the owner is not able to provide a suitable habitat for the animal to roam outside the city. GGNRA has no responsibility to provide this habitat and, in fact, should absolutely not do so to the considerable detriment and burden of all who enjoy and cherish this very special limited resource.

Although I do not think that the GGNRA plan goes far enough in curbing unconstrained use of the Park by dogs, I feel it goes a long way in abating the unfair abuses that have taken place in the past and continue to take place today. I sincerely hope that GGNRA policy makers have the courage and will to follow through with these much needed proposals, in spite of the enormous political pressure they will undoubtedly receive from the powerful organized San Francisco dog ownership community.

Correspondence ID: 117 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 13:15:04

Correspondence Type: Web Form

Correspondence: I consider myself a responsible dog owner and an appreciative user of public areas to exercise my dogs and exercise myself at the same time. This report and its "preferred alternatives" appear to consistently introduce many more regulations and restrictions without showing in detail any specific data to justify these additional restrictions.

I would like to see data showing a list of any actual incidents that necessitate these additional regulations. All I have found so far are generalized blanket statements and slogans that are not specific to the particular individual geographic areas under consideration. - I would like to be able to identify problems that may be occurring in specific areas. - Have dog biting incidents happened at specific locations on a more frequent basis than other areas? - Is soil degradation or habitat disruption occurring more rapidly in a particular area.

I cannot comment on all of the geographic areas under consideration. However I do frequently use the Marin Headlands and Rodeo Beach areas

of the GGNRA. The Coastal/Wolf Ridge/Miwok loop is the most valuable area to me. This loop offers me a challenging hiking environment as well as an off-leash opportunity for my dogs.

I would ask that consideration is given to maintaining ROLA's that offer not only flat walking areas such as Crissy Field etc., but also ROLA's that offer more challenging exercise opportunities for those of us who enjoy the hiking offered within the GGNRA.

Correspondence ID: 118 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 13:16:08

Correspondence Type: Web Form

Correspondence: Further restrictions on dogs and their owners are unacceptable. There are already so many restrictions and so few places where dogs are allowed, these new rules are unnecessary and, though I hesitate to use the term, unfair. The parks need rules and guidelines, and I am a supporter of protecting open space and the environment. However, if anything should change it should be in the direction of providing more areas that are open and accessible to dogs and their owners. That may not be perfect for maintaining open space in its perfect, pristine natural state, but compromise is necessary, and there are hundreds and thousands of park acres that can and are set aside for that precise purpose--no wheel chair accessibility, no bikes, no horses, no dogs, etc.--essentially only for the able bodied hiker. For instance, Tennessee Valley trail is already a mini highway. It even has a paved road. I see no reason why leashed dogs should not be allowed there. Muir Beach has a tradition of being open to dogs, and from the comments I see in our local paper, many residents are in favor of keeping it that way. (The renovations/modifications that have been done there are the subject of another letter. What were you thinking?) There are places in our parks that are going to suffer from use. That is inevitable, but not a good reason for these added restrictions. We have to hope that dog owners will be responsible. We don't live in a perfect world, so there will undoubtedly be problems--that's life and even the parks should make the best of it without punishing everyone.

By the way, I do not own a dog, but am willing to share my space with them and their owners. They are far more agreeable and less destructive than many other park users I have met in my 65 years on the planet.

So I say NO to the new plan.

I will be out of town on March 2 when the public meeting is to be held at Tamalpais High School, so I can't be there to say it in person. Thank you for your time.

Correspondence ID: 119 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 13:23:09
Correspondence Type: Web Form
Correspondence: i support Alternative A, thank you Walter Dawydiak

Correspondence ID: 120 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 13:30:55
Correspondence Type: Web Form
Correspondence:

Correspondence ID: 121 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 13:41:24
Correspondence Type: Web Form
Correspondence: This plan is overly restrictive and lacks many other variables that should be considered.

- As I walk the beach at Crissy Field, though I do see an occasional missed dog feces, I see much more human produced contaminants. I have seen everything from syringes, various plastics, bottles, cans. The Park Service was handing out collection bags last week. The VAST majority of the people who participated in the beach clean up were dog owners. Without the dog owners, the beach will be much less clean and safe. - The government is very concerned with healthcare of late, especially obesity. The main reason I get as much exercise as I do is because I walk my dog. - Dogs at Crissy Field stay exclusively on the beach or in the water. They do not go in any areas that are not allowed access by humans. -One of the main attractions of Crissy Fields are the dogs. Many non-dog owners that I have spoken with come to Crissy Field to enjoy the vista and see the dogs play. - owners with aggressive dogs rarely bring their dogs to Crissy Field. I have never seen a negative dog/human interaction that caused harm. Dog owners self-regulate the type of dog that comes to Crissy Field. If an aggressive dog is brought to the site, the many owners will make sure that that dog is banished.

Correspondence ID: 122 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 14:34:12
Correspondence Type: Web Form
Correspondence: Thank you for addressing the issue of dogs in the parks.

I have read the park document and I am in favor of option D - the most restrictive as far as dogs in public parks.

The over-population of dogs in San Francisco is putting all other living creatures at risk for disease or destruction. I realize there are many dog lovers in this city that want no restrictions on their pets, but that is in no way healthy for plants, animals or humans. Please consider heavy restrictions on dog access to parks before they destroy even more of our environment.

Thank you, Adrienne

Correspondence ID: 123 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 14:36:08

Correspondence Type: Web Form

Correspondence: I am writing this comment in support of keeping Fort Funston an off leash dog park. I take my dogs to Fort Funston on the weekends with my husband and my husband takes them every day of the week. I am trying to get some kind of logic to why would this Dog Management plan would take affect to somewhere as great as Fort Funston. This area is great to take our pets not really to me considered an area for kids to be around, the trails are perfect for dogs and horses. I also watch as my dogs learn more on interaction with other animals and people. We have very limited areas to take our dogs off leash and for anyone to take that away would mean we are feeling like being driven out. We as pet owners have always been told to make sure you train, get your dog to interact, and give them exercise but how can we do all of that if we can't even let them run around in a free space.

Correspondence ID: 124 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 15:00:39

Correspondence Type: Web Form

Correspondence: Some pet owners let their pets roam around without leash on Lands End. I try to remind the owners to leash their pets. Their usual responses are " Oh, it's harmless. " Well, until it bites.

I have nothing against pets except when they are not leashed. I feel threatened when the pets are not on leash.I do not want to feel scare when I enjoy a walk in the National Parks. I do not want to wear an armor or carry a stun gun to protect myself against pets.

There were one too many dog mauling cases in SF alone. If unleashed pet is a violation of the Health Code in SF, it should apply to the entire City Period.

The selfish behavior of the unleashed dog owners needs to be stopped.

The potential hazard of this dangerous situation needs to be mitigated before tragedy explodes.

There should be patrols and signs with dispatch phone number to report violators and to spell out the penalty of the unleashed pet owner including but not limited to prosecution and civil lawsuit.

Safety is my paramount concern. I prefer that pets are prohibited at Lands End.

Correspondence ID: 125 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 16:33:28

Correspondence Type: Web Form

Correspondence: I have lived in San Francisco for over 40 years and have enjoyed the use of the beaches and recreational areas with my dogs. I do not like to walk dogs on a leash and thus have taken them to Ocean Beach and the beaches near Fort Funston where it has been legal to walk them off leash. I feel that this new plan is not fair to the residents of San Francisco because we are used to having the full use of Ocean Beach and most of the areas under consideration. It seems that this plan not only takes away most of the area but also makes it off limits to dogs at all. This is a city where thousands of people live and at least 35% of them (in my estimation) have dogs. This is not a rural National Park, but rather a urban environment where the people use the beaches for relaxation and exercise, not to mention just sitting and looking at the ocean. I was just out at the beach near Irving Street watching dogs romp, children play and yes, the little birds running in the surf all in harmony with each other, no one disturbed by anyone else, all enjoying the freedom of a lovely day at the beach.

If this plan goes into effect, I believe the most people will just continue to do what they always do, take their dogs to whatever beach is convenient, only now they will have to be afraid that some park ranger may come up and give them a ticket.

I am firmly against this plan and I hope that you will reconsider and change it to leave our beaches to us, the citizens of San Francisco and our dogs to use in peace.

Thanks you

Linda Ost

Correspondence ID: 126 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 17:03:00

Correspondence Web Form

Type:

Correspondence: As a neighbor of the GGNRA and a frequent walker/jogger on the GGNRA trails in southern Marin, I recommend that the Coastal and Miwok trails be limited to dogs on leash. Voice control is a joke in these areas, and it is an unenforceable standard. I have seen numerous altercations with dogs on the trails, and my husband was once attacked by a dog under "voice control." Dog walkers often bring 5 - 6 or more dogs onto these trails at one time. There is a great deal of human, bicycle, and animal traffic along these trails, and I believe that dogs should be more tightly controlled in this area.

Correspondence ID: 127 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 17:14:42

Correspondence Web Form

Type:

Correspondence: After reading the documents on this site, I question the motives of the authors of these proposals, their merit and the legality of introducing potential regulations so clearly based on opinions, mischaracterizations and misinformation. The below quote is taken from the executive summary and depicts an environmental statement that must accompany any proposal the agency is to consider, and is followed by my rationale as to why none of the stated purposes of the action are adequately addressed by the proposal.

"The National Environmental Policy Act of 1969 (NEPA) requires an environmental impact statement (EIS) to briefly provide a statement of purpose and need for the action the agency is proposing."

Stated purpose for taking action, and why the proposals do nothing to address these "needs".

? Preserve and protect natural and cultural resources and natural processes

In all of the documents listed on this site, I couldn't find any scientific studies or facts stating definitively that dogs negatively impact the natural and cultural resources more than humans alone. As coyotes (wild dogs) are native to much of areas of concerns, dogs are simply an extension of nature.

? Provide a variety of visitor experiences

99% of the areas of concern are free of dogs under the current rules and regulations. If variety of visitor experiences are a priority, dogs should be allowed in a greater percentage of the available land.

? Improve visitor and employee safety

I did not see any documentation regarding decrease in visitor and employee safety due to off-leash dogs. In my opinion, an off-leash dog is much safer than an on-leash dog as the majority of dogs will attempt "flight" before "fight". However, on a leash the ability to flee is removed, and only the fight remains. In the absence of clear evidence that displacing off-leash areas with on-leash improves safety, how can this blanket statement regarding improved safety be considered?

? Reduce user conflicts

The documents cite confusing rules and regulations regarding off-leash and on-leash and resultant user conflicts. I have reviewed proposals B-E and find them as equally confusing and convoluted as the status quo (proposal A) if not more so. There is no chance yet another confusing set of changes on top of the current rules will improve comprehension of the policies and thus reduce user conflicts.

? Maintain park resources and values for future generations

The use of the term "maintain" here is out of place as only proposal A (status quo) maintains the current rules and values. As for resources, that was addressed in the first bullet.

I am shocked and embarrassed that my tax dollars have funded such a poorly executed and clearly biased set of proposals. Please leave the dogs alone and spend our tax dollars on something that actually improves society.

Correspondence ID: 128 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 18:41:46
Correspondence Type: Web Form
Correspondence: Oppose New Regulations

I understand the challenge the NPS faces in balancing many competing needs for use of the park and at the same time the overarching goal of protecting the environmental and natural features of the GGNRA for generations to come. Not an enviable task.

But the proposed new regulations regarding dogs are not the answer. Already there are many beaches and trails where dogs are not allowed or must be leashed. There are relatively few places where dogs can be off leash. The key is to make sure that overall balance is preserved and that in those areas where dogs are allowed off leash dog owners act responsibly.

That means requiring that dog owners pick up their dog's waste, have voice control over their dogs, and be mindful of small children or others who may be afraid of dogs. Regulating the number of dogs one person can have makes sense, including requiring permits for professional dog walkers who have more than three dogs at a time.

Stinson Beach, a state beach has it right - dogs are allowed off leash on one big stretch and not allowed at all on another. That way, there is an area for people who do not want to be around dogs, and for birds to be free from dogs. Many dog owners, in appreciation of the beach front use, pick up garbage that others leave behind.

There is hardly anything more joyful and that connects many to animals and nature than watching a happy dog run free. That is a beneficial use that NPS should recognize.

Correspondence ID: 129 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 19:37:52
Correspondence Type: Web Form
Correspondence: I am writing to object to the proposed 2011 Dog Management Plan for the GGNRA. In my view, the GGNRA has not gathered enough evidence of any sort to justify banning/restricting dogs from the GGNRA lands. Your science advanced is weak, and few surveys indicate that the majority of park users see any need for change.

I suspect your continuing with these policies which show so little regard for the preferences of the majority of the citizens will subject you to lengthy and vigorous law suits. Please don't waste my taxpayer money causing the GGNRA to be a target because of your poorly reasoned policies.

It is hypocritical to ban dogs -- why not then also ban people, kite flyers, bike rider, and your earth movers which have regularly torn up Ocean Beach?

Correspondence ID: 130 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 19:46:13
Correspondence Type: Web Form
Correspondence: Thank you very much for this plan. I support it 100 percent because it is fair and balanced for dog-walkers, non dog-walkers and the environment. It is now up to the dog walkers to show that this can work by not violating it.

Correspondence ID: 131 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 20:27:35
Correspondence Type: Web Form
Correspondence: To: Superintendent Frank Dean, GGNRA

Dear Mr. Dean,

I am writing to express my support for the tighter regulation of dogs on federally managed properties in Marin.

Protecting wildlife should be the highest priority, and for this reason, it is inappropriate for dogs to be off-leash anywhere in the GGNRA. Also, there should be more rigorous official enforcement of the law. Without enforcement, the change in the law will accomplish little.

Thank you for defending our beautiful, wild parks.

Katherine Wing

Correspondence ID: 132 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 20:34:57

Correspondence Type: Web Form

Correspondence: I have had one too many unpleasant encounters with unleashed dogs, not just while walking at Limantour Beach, Tennessee Valley, or hiking through Muir Woods but in many other places. I'm sorry, but I don't think GGNRA, NPS, State, Local, or any agency is responsible for the happiness of dogs or their owners. I've had unleashed dogs growl at me and come towards me in an extremely aggressive manner. I've also had unleashed dogs jump on me and, in some cases, they have torn my clothes. When I complain to the owner, I'm told to go "F" myself. Nice. Personally, I think dogs are a nuisance and don't belong in any of our state, local, or national parks. I've seen dogs chase deer, fawns, birds, and other dogs. I think we put enough stress on wildlife without adding dogs to the mix. Dog owners can put their pets on leashes and jog through the streets with them for exercise - it will benefit the owner as well as the dog. Finally, I will add that service dogs are excluded from my rant.

Correspondence ID: 133 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 20:57:02

Correspondence Type: Web Form

Correspondence: I am a dog owner (5 year old yellow lab) who visits GGNRA beaches once every 3-4 weeks. We have thoroughly enjoyed the off-leash, voice-control

policy at Rodeo, Muir and Crissy Field beaches over the last 5+ years. I consider myself a responsible owner - always cleaning up after my dog, not allowing her to roam freely without my close supervision, etc. I respect the need to protect the environment and to ensure that non-dog owners can enjoy their experience, and I also recognize that there are some dog owners who aren't as responsible as they should be. With that in mind, I make the following observations:

a) On a typical visit to Muir Beach, I find the remnants of barbeques, picnics, bonfires, parties where alcohol has been consumed, etc. I have literally filled bags with the leftover trash from these events - none of the damage done looked to have been made by dogs. The environment suffers most by the presence of people, not supervised dogs.

b) I am hard pressed to ever find dog poop on Muir, Rodeo or Crissy. I think this is because we dog owners understand we are under (deserved) extra scrutiny, and overall we act as stewards of the beaches because we cherish our ability to exercise our dogs there leash-free (having dogs on-leash on a beach is oxymoronic).

c) The proposed ROLA at Muir Beach is far too limited in size - dogs tend to have issues with each other in more confined spaces. The size of the beach prevents too many dogs from being in one place. I can see a problem with dogs being off leash on the busiest of weekend days, when space is at a premium. However, most days at Muir are pretty mellow - even on weekend mornings before 10, I am often there with less than 10 people. Perhaps there is a way to allow dogs during certain times of the day - say, not allowing them off leash during peak people hours.

I feel that, rather than implement on-leash restrictions (I wouldn't bring my dog to the beach in that case) or an outright dog ban, the GGNRA can study creative ways to reduce dog presence, if in fact they are deemed as hazardous to the environment. For example, they could be permitted on summer weekends before 10 am - that way they would not be an issue to non-dog owners during more crowded hours. Ultimately, I feel that people are the biggest environmental hazard. I would wager that dog owners care more for the beach (most are probably frequent visitors to their beach of choice) than the weekend picnicker.

Thank you.

Correspondence ID: 134 **Project:** 11759 **Document:** 38106
Received: Jan,17,2011 22:19:55
Correspondence Type: Web Form

Correspondence: I live in Brisbane but frequently visit the Ft Funston GGNRA to exercise my dogs. I also own property in San Francisco County and pay taxes so I have a financial investment and policy say in San Francisco County. The Ft. Funston area is used almost exclusively by dog owners who do an excellent job in self managing the area. We owners clean up after our dogs and also dogs who don't belong to us; we collectively manage the behavior of the animals and ensure that no animals behave improperly to other dogs or humans. Ill behaved animals and their owners are told to leave. Unlike Chrissy Field where the areas are utilized by non-dog owner families and dog owners, Ft. Funston does not attract non-dog adults; non-dog family with children; on non-dog sunbathers and picnic parties. Under the proposed plan the current beach area of Ft. Funston will remain off-leash. That's great. However, the walkways to the beach should remain off leash also. There currently exists barriers along the walkway to keep dogs away from the sand dunes that require protection; and if dogs do venture into those areas, they are quickly recalled by voice command. This plan while well intentioned is unnecessary and costly. We don't need government supervision in an area where responsible dog owners already have this issue under control.

Correspondence ID: 135 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 22:24:34

Correspondence Type: Web Form

Correspondence: When considering these changes please keep in mind the difference between commercial dog walkers and private citizens who own canines.

Kindly keep the majority of these wonderful areas dog friendly and as much off-leash as possible. Our dogs love the open space! Not everyone has access to a car to get to some of the parts of town that are further afield (Chrissy Field, Fort Funston, etc) so it's important that all parks maintain some sort of off-leash area.

Thank you

Correspondence ID: 136 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 22:30:42

Correspondence Type: Web Form

Correspondence: Dear National Park Service, Thank you for allowing me the opportunity to comment on your GGNRA Draft Dog Management Plan. As a tremendous fan of the National parks and the amazing jewels of the GGNRA, I am dismayed at this proposal. I have a three year old child and a black Labrador retriever and we all love Crissy Field. The opportunity for our family to take a walk together, breathing the fresh air while taking in the splendors of the

Bay is a true benefit of living in San Francisco. Our dog stays on leash much of the time but loves the chance to run free on East Beach and swim in the water. I believe we can do this while respecting the environment and the fellow parkgoers. We love meeting the other dogs and people enjoying Crissy Field. Walking there with everyone makes you feel a part of something bigger- a community in the natural beauty of San Francisco Bay. Please don't eliminate this opportunity by drastically restricting the off leash sections and forbidding dogs on East Beach. A compromise is definitely possible. Far fewer people will come to the GGNRA if you enact these draconian measures. And aren't parks for people too?

Sincerely, Diana Gregory

Correspondence ID: 137 **Project:** 11759 **Document:** 38106

Received: Jan,17,2011 23:46:33

Correspondence Type: Web Form

Correspondence: At a minimum all dogs should be on leashes at all times. Banning dogs from many areas is also a good idea. I like dogs, but I don't feel comfortable taking my daughter to these parks and beaches because there are so many dogs that are not on leash and out of control. On more than one occasion I've seen small children bowled over by a dog. Also, I don't want to let my daughter crawl around, and I don't want to sit down where a dog has just defecated or urinated. I know the usual response is that most dog owners are responsible and that it is unfair to punish all dog owners;however, it is unfair to punish me and my family by making us deal with the bad owners or forgo the use of the parks.

Correspondence ID: 138 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 00:29:20

Correspondence Type: Web Form

Correspondence: I am for keeping all dogs on leashes in public areas. I was recently attacked by two unleashed Husky's at Pt. Reyes National Seashore where the owner gave me a phony name and address.This incident caused me medical bills and a question of contracting Rabies.People cannot control their dogs with voice commands as well as they think so, a leash is the only way to protect the public from a dogs bad behavior.Please protect the people and natural resources from uncontrolled pets. Thank you very much, Francois Saint Gassies

Correspondence ID: 139 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 08:46:43

Correspondence Web Form

Type:

Correspondence: To whom it may concern,

I am an active user of Crissy Field and not a dog owner. I have been frustrated over the years by the brash and borderline obnoxious behavior of many dog owners, particularly at the East Beach and the adjacent parking lot. That said, there are many dog owners in SF and I do believe that there needs to be addressed somewhere within the boundaries of Crissy Field.

I want to express my strong support for the Preferred Alternative in the DEIS that came out on 1/14/11. It is an extremely fair and balanced proposal that addresses the needs of all the park users and not just dog owners. I know that a lot of hard work went into tackling a contentious and often emotional issue. Off leash dog use is just not always compatible with other park uses, particularly parts of the park that are used intensely such as the East Beach. I believe the DEIS acknowledges this in how spaces are allocated. Trying to sit with your children or picnic on a beach full of off leash dogs is honestly impossible. We have a right to enjoy this place just as much as dog owners. By providing off leash, on leash, and dog free zones, ALL of us can pick and choose the quality and type of experience we want.

I know that some dog owners and their advocacy groups are already lining up opposition to your plan. They will be organized and are already spreading misinformation. They will show up at meetings like they did several years ago and drown out those who disagree with them. Just because you can yell the loudest doesn't mean that you speak the truth or represent the majority. I keep seeing them cite figures that 99% of the park is already off limits to dogs. In the case of Crissy Field, that is just not the case and certainly will not be the case under the preferred alternative. The Central Beach is almost > of a mile long. By my estimation more than half of the beach at Crissy would allow off leash dog use under the preferred alternative. Over half the large grassy field will be designated off leash. These two areas are huge and ideal for off leash dog use since they are used less intensively than other parts of the park. When described to my dog-owning friends, they are thrilled that they will still be able to come down to Crissy and run their dogs off leash with minimal restriction.

Until this alternative is adopted, please note that the 1979 Pet Policy requires that dogs be on leash in all parking and picnic areas at Crissy Field. Despite the action of the judge requiring the negotiated rulemaking, the 1979 Pet Policy still needs to be enforced relative to dogs off leash in and around the parking lot and picnic area adjacent to the East Beach.

Regards, Chris Apicella

Correspondence ID: 140 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I understand that there is a need to control dog access to some parts of GGNRA. I'm all for the protection of ecosystems, wildlife and people. I also understand that many dog owners are not particularly responsible. However, dogs are a very important part of our lives and being able to take them into nature off-leash is a valuable and healthy activity for owners and dogs alike. I have been taking my small dog to Ocean Beach every weekend for the past 3 years. I've never seen a problem - it appears to me that for that section of the beach all the people and pets seem to coexist quite well. It would be sad if a few irresponsible people would cause great joy to be taken away from so many. It would be better if there were a system that allows responsible dog owners to enjoy these areas while banning those who can not follow the rules. Unfortunately, in the meantime the problem people will continue to cause problems regardless of your policies.

Correspondence ID: 141 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 09:41:15

Correspondence Type: Web Form

Correspondence: Please do not further restrict dog-friendly areas of the Park. As a responsible dog owner, I truly value being able to enjoy the Park with my dog. I always pick up after him, and he is under excellent voice control.

As a lifetime resident of San Francisco, I urge you to not limit dog access further than it already is limited.

Thank you!

Correspondence ID: 142 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 09:52:48

Correspondence Type: Web Form

Correspondence: I agree with the proposed plan. It seems like a fair compromise for everyone, including dog owners. I own two dogs and a horse.

I do not visit the unofficial 'dog park beach' at Crissy Field because all of the dog owners are not as responsible as they should be. The problem of unruly dogs seems to stem from sedentary owners who have very active dogs that they just want to stand and throw a ball to. And many times the 'dog play' ends up across the walkway in the habitat restoration area. Yes, dogs need

exercise, but running or taking a long walk on leash should be the preferred exercise.

In terms of dog waste, I wonder what it does to the eco system of the bay to have what amounts to a small sewage dump at the beach?

Dog owners shouldn't be selfish in their demands. This is a fair plan for everyone.

Correspondence ID: 143 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 10:11:56

Correspondence Type: Web Form

Correspondence: As a frequent user of the federal parks in San Francisco I believe reducing the amount of off-leash access for dogs is a terrible mistake. One of the things that makes San Francisco so unique is it brings together people from all over the world. However, my experience over the last 6 years is that people are so busy with work and/or caring for their families that it is hard to meet new people and form new relationships. My wife and I have met a great detail of friends and built out our community in Cow Hollow primarily through interactions with "strangers" at GGNP because of our dog.

Beyond community interaction there are significant health benefits of off-leash dog access. The only exercise my parents get is long walks with their dog which is only enjoyable if the dog is not tied to owner. Considering how unhealthy and overweight our country is and financial impact it has on the federal government doing anything that reduces American's outdoor activities seems irresponsible.

Finally while I do not have the numbers I imagine that dog owners pay significantly more federal taxes than non-dog owners. Therefore from a equitable standpoint the proposed regulations are unfair and unjustifiable.

Correspondence ID: 144 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The additional restrictions proposed for dog owners is very sad. There are already few enough areas where well behaved dogs can go for long walks. Typical dog parks are not comparable alternatives.

Correspondence ID: 145 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 10:16:42

Correspondence Web Form

Type:

Correspondence: this would be a treable loss for the bay area. there ae few areas that dogs are allowed to run free. the local dog parks are nice, but are not Ft Funston. we use this park every weekend, year round. To limit it to a small confinded area, makes it no better then the local dog park.

Correspondence ID: 146 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 10:19:46

Correspondence Type: Web Form

Correspondence: I support the parks effort to create a fair dog policy. This is a good start. I favor banning all off leash dogs from the park. Many dog owners openly flaunt leash laws resulting in terrified innocent visitors and wildlife. We all must share the space. Thank you.

Correspondence ID: 147 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 10:51:20

Correspondence Type: Web Form

Correspondence: As a resident of the City of San Francisco since 1997 and a Bay Area resident since 1984, I am very grateful for our parks and open spaces. I have lived here both as a non pet owner and more recently for the past 5 years as a dog owner. I feel that most dog owners are responsible for their personal dogs and pick up after their dogs and abide by the rules outlined for parks. For many of us professionals, these animals are akin to children. It is with this great sensitivity that I ask you to consider the regulations being proposed. Limited use, off-leash areas in the parks are very beneficial to the neighborhoods of the Bay Area as it gives an acceptable way for us as urban residents to keep pets. These dogs add so much not only to our lives but to those in the neighborhoods around us. In order for pets to be well-behaved (watch any dog training show) they need exercise. It's the responsible pet owner who takes their dog to parks that allow off-leash exercise. That good pet-ownership behavior should be commended and not punished. Suggestions that may help both protect these park areas and allow respectful off-leash use within these areas are described below: Create a license for dog walkers who use the areas to ensure that these walkers are bonded and insured as well as licensed to use the recreation area. Limit the number of dogs any one walker can have at a given time to for example 5 dogs and no more than two visits per day by the walker to any one park. Post rules and regulations to allow violation reporting for dogs (such as unlicensed dogs, not picking up feces, aggressive dogs, too many visits per day to an area by dog walkers). Personally, I would be OK with Crissy field having a limited-us off leash period such as from 4-10pm. I do see this as a potential area of

compromise. This would allow residents to walk dogs and would eliminate the dog walker issue at Crissy Field which is limited in space as compared to Fort Funston. There are a lot of children there and so this would likely get rid of that overlap also. You are welcome to comment me with further questions or discussion.

Kind regards, Nicole Miller, PhD

Correspondence ID: 148 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 10:52:41

Correspondence Type: Web Form

Correspondence: I have been taking my dog out to Fort Funston since I moved to California in 1996. I have frequented Fort Funston ever since with my Siberian husky Zoey. My breed of dog was bred to run and explore. Fort Funston is a beautiful, beneficial, and unique place in that it provides the vast open space necessary to socialize, exercise, and conduct canine training for large volumes of dogs. My experience with training dogs tells me that dogs being pack animals require open space to exercise properly and socialize without any tension caused by a restraint or leash. You can't play ball or swim off excess energy with a dog lead attached. I've also made many friends over the years that share my interest and love for dogs. There is even a grassroots organization that was created to maintain the integrity of Fort Funston and to promote the continued use of the park for off leash hikes with our dogs (Fort Funston Dog Walkers). There are also other canine interest groups who organize to protect the past and current status of a dog friendly preserve at the Fort. The SFSPCA, ProDog, and SF Dog are all involved with the education and the promotion of our dogs' physical and mental health. After all, dogs are animals too and even though they have been domesticated over a thousand years, they still have strong drives and needs that need to be satisfied in order to avoid the development of behavioral problems and unsocial mannerisms. Dogs require a place where they can just be dogs, as do other species in the animal kingdom. Being essential parts and members of our families in San Francisco and the surrounding counties, I and many others feel that our family dogs will be very negatively impacted if Fort Funston is turned into a leashed dog park. After all, where else could hundreds of dogs go everyday to seek the social and physical stimulation that is required to keep them balanced individuals, as well as "good K-9 citizens"?

If the proposed plan passes, the inadequate small parcel of land allotted for "off leash" dog activity will create a dangerous and cramped atmosphere. The boundaries of bluffs, highway, and parking lot, will create a safety issue for dogs who need space to exercise and explore. This will adversely affect the quality of life at the surrounding local parks which can't provide the

adequate space necessary for the hundreds of dogs banned fro Fort Funston. The ripple effect will be devastating on the local community, as well as the physical and mental health of our beloved canine family members. Fort Funston has been a dog friendly park even before it was ceded to the GGNRA, under certain conditions and requisites, back in 1979. The dogs are an intregal make up of the spirit, character, and landscape at Fort Funston. If you do remove the dogs from Fort Funston, the vacuum will inevitably bring in nefarious and undesirable elements, such as crime and homeless encampments. Funston has served this community for decades and you will find that 90% of the park users and advocates own dogs. It is not in the interest of the federal government to go against the wishes of the local inhabitants, simply because it has the power. If it s not broke, then don t fix it.

Correspondence ID: 149 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 11:54:33

Correspondence Type: Web Form

Correspondence:

Dear People, I am appalled by the proposed limitations for dogs at our parks and beaches. There are already so few places where dogs and their owners can enjoy some freedom in the natural world that these new restrictions would make living in the beautiful Bay Area feel like bondage.

The restrictions are not in response to an actual problem. Dogs off-leash do not harm people or the environment or people's enjoyment of the environment. 99% of dog owners are very responsible, and the community is in general self-policing. If the rare dog owner neglects to pick up a poop, it's just as likely to happen on-leash as off-leash. And whenever I or my friends spot a stray poop, we pick it up.

It's a little like banning all food & picnicking at parks because one irresponsible family leaves their trash behind. It's overkill and makes no sense. There will always be jerks, but it's important to maintain our liberties. So we impose fines on lawbreakers and hire people to help keep the parks clean. And we encourage citizens to take care of their parks.

We all just need to learn to get along. I may not like it if some kid throws sand in my direction or runs across my towel, but that's just life at the beach. We need to share our resources, respect our neighbors as much as possible, and be tolerant of each other. We don't need knee jerk reactions like banning kids, or picnics or dogs, just to satisfy a few loud, uptight people who would prefer to have our parks to themselves.

I am a responsible dog owner. I deserve to have the freedom to enjoy the few remaining parks and beaches where dogs are allowed to go. Crissy Field

already has non-dog areas. Please do not bow to the minority opinion of control freaks and animal haters by unnecessarily restricting our rights and our world.

Thank you for your help.

Correspondence ID: 150 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 00:00:00
Correspondence Type: Web Form
Correspondence: San Francisco is all about quality of life. For many of us here, the City and the GGNRA being dog-friendly is one of the reasons that the Bay Area is a great place. To be able to enjoy our parks and beaches with our four-legged friend is important to us.

Please don't squeeze us all into tiny spaces.

Correspondence ID: 151 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 12:10:53
Correspondence Type: Web Form
Correspondence: I think that the GGNRA should treat dogs exactly as they treat them in other national parks. Dogs should be kept on-leash at all times. Free-running dogs are a threat to bird-nesting habitat and they frighten many people, including my wife. There is no such thing as "effective voice control" of a dog.

Correspondence ID: 152 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 12:29:00
Correspondence Type: Web Form
Correspondence: Dear Sir or Madam,

It would be a complete travesty if anything other than option A was chosen.

There are over 100,000 dogs in San Francisco and they need somewhere to go. Not everywhere has to be off-leash, but Fort Funston, Crissy Field and the Presidio are wonderful places for dogs. This is one reason San Francisco is so beautiful and unique. The comments that dog waste could possibly cause the reduced enjoyment of the park for future generations is preposterous. From what I see, most dog people are extremely careful about cleaning up after their pets and self-policing those that do not. I would worry more about those locations with a lot of people, not dogs, as those

most likely to be degraded by over use.

Finally, as the owner of an active dog, we need off-leash places for our dog to recreate and we hope you reconsider these proposed changes.

Sincerely,

James R Newhouse

Correspondence ID: 153 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 12:34:39

Correspondence Type: Web Form

Correspondence: I have reviewed the proposed map for the Fort Funston area and have concerns.

1. The off leash area is NOT large enough for the volume of dogs on a typical day.
2. The beach is often unsuitable for recreation due to weather conditions. Limiting the pathways to leash only defeats the purpose of this park.
3. If you truly want to know how dog owners feel about this place - please check out yelp.com and see the 420+ reviews over several years of the intense usage of dogs and owners.
4. This is NOT just a park for those on the peninsula. We intentionally drive 45 minutes to come to this location. It is used by the ENTIRE bay area.
5. Please don't let the hatred of the few or the irresponsibility of the few create rules for the masses.
6. The pathway indicated for leash only down to the beach is IMPRACTICAL. It is extremely sandy and a MAJOR incline. I foresee the GGNRA being SUED for improperly maintaining that trail since dogs will DRAG their owners down this path/cliff. Injuries will happen!!!!!!

Correspondence ID: 154 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 12:34:42

Correspondence Type: Web Form

Correspondence: I am writing with respect to the proposed law changes regarding dogs on Muir Beach. Like many, if not all, residents who live here, we deeply value and appreciate the natural beauty and splendor that this area has to offer. For

many of us, it is the primary reason why we choose to live here. That said, we certainly do not take our habitat for granted, and many of us are actively involved in projects that better ensure that our surroundings remain clean, unspoiled and unpolluted. That said I strongly disagree that the current off-leash (voice control) laws need to be changed on Muir Beach ... and on many of the surrounding trails. Again, as a resident of the Muir Beach community, I strongly believe that I am able to provide some sound, on the ground perspective as to the reasons why I think these laws must not be changed. First, most of the dogs that enjoy Muir Beach belong to residents that live in Muir Beach. I say this with confidence and first-hand perspective as I frequent the beach on a daily basis. Speaking on behalf of myself and my fellow neighbors, the resident dog owners truly respect the privilege of having our dogs enjoy the beach....and dog-owners act accordingly to safeguard the more sensitive habitats from our pets. Second, there have been no dog attacks at Muir Beach. This fact speaks volumes as I have never seen nor heard about a vicious dog attack in our community. Of course, this also speaks very well about not only the owners that live here, but every dog-owner who visits here....not to mention the types of visitors that this area attracts. Third, we do not have a dog 'waste' problem on the beach. In other words, the concept of doggie bags is a quite familiar and respected...especially in an area as beautiful as Muir Beach. Fourth, the notion that dogs have threatened the wildlife in more sensitive areas is quite simply unfair and unfounded. The creek bed area currently has signs and fencing that indicate sensitive habitat. Also, it is simply not true that dogs roam freely in these sensitive areas eating endangered toads or fish...not to mention destroying their habitats. Never have I heard nor seen this happen. Never have I heard a neighbor recount a story that this happened. Further, the probability of foxes, coyotes or feral felines 'disturbing' this area is significantly greater than that of dogs. I say this because the overwhelming number of dog-owners appreciate the off-leash laws and see it as a privilege.

In light of all this, I understand that much work has been put into restoring and protecting the areas surrounding Muir Beach. I also understand that it is only natural to create new laws to further bunker proof this area from all and any threats. However, changing the current off-leash laws would create far further damage to the community and to all those that visit with their dogs. It would be unfair and unwarranted punishment to change these dog laws or enforce further restrictions without the burden of proof that dogs have been in any way responsible for any habitat destruction. Certainly, if the primary concern is safeguarding the creek and sensitive areas from predators, than I kindly ask that that your committee looks into better, more robust fencing and more signage as a pre-emptive measure. Also, posting signs with fines for non-compliance would be another effective deterrent.

I appreciate the time and consideration that you took to read my letter.

All the best, George

Correspondence ID: 155 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I have been walking my dogs off leash on Ocean Beach & Ft Funston for almost 40 years. These areas should be available for use by citizens who live in the area. What other uses are there? I understand the need to protect natural resources but for whom are you protecting them?

I have seen over the years more damage done to the environment by unsupervised children and adults than I have ever seen done by dogs. Most of the people now using these areas are doing so to enjoy spending time with their pets and those without dogs seem to be enjoying the interaction with the dogs. My worst experience on Ocean Beach for example was when a hang glider crashed on the beach and injured a pedestrian and scared several animals.

Do you also intend to ban people from using these areas altogether? You may extend your protection to this extreme if you consider it necessary. This is my fear. There are many people in this City who consider their pets as part of their family and in many cases as their only family. They have the right as taxpayers and citizens to use these parks for their recreation.

Correspondence ID: 156 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 13:23:00

Correspondence Type: Web Form

Correspondence: I am thankful for the GGNRA to put forth this plan and hopefully reign in some of the reckless dog recreation in the GGNRA. I no longer bring my 2 little girls to many of the sites mentioned in the plan, i.e. crissy field tidal lagoon, because of the out of control dog recreation. The Crissy field tidal inlet is the one of the best locations in the city where a child can experience the wonder of tidal influence. Although the few times I have brought my girls (1 & 3 yr old) to play in the water they have been either knocked down or intimidated by 'oh don't worry, he's friendly dogs'. Needless to say my little ones did not have the experience I thought they would.

I am also pleased that the plan recognizes the value of the natural world in the GGNRA. It is the responsibility of the GGNRA to protect not only the rare plants and animals, but also the habitat which creates the foundation for

our land to carry as much biodiversity as possible.

My only complaint would be that the plan does not go far enough in limiting off-leash dog recreation. Although I recognize it would not be a popular option, I personally would like to see all GGNRA lands leash only and no dogs allowed.

Thank you for the opportunity to comment

Correspondence ID: 157 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 13:24:24

Correspondence Type: Web Form

Correspondence: I am an active use of Crissy Field and not a dog owner. I spend at least 2-3 hours per day at Crissy Field, mostly engaged in running, biking, windusurfing, and paddling. I have been frustrated over the years by the behavior of many dog owners, particularly at the East Beach and the adjacent parking lot. While I do agree dogs should be allowed on East Beach, may dog owners do not behave like they are willing to share the wonderful resource that is East Beach with other recreational users. Over the years I have seen a great deal of obnoxious and sometimes dangerous dog behavior due to unsupervised dogs at East Beach.

I want to express my strong support for the Preferred Alternative in the DEIS that came out on 1/14/11. I feel this is a fair proposal that addresses the needs of all park users, including dog owners. By providing off leash, on leash, and dog free zones, all recreational users will be able to enjoy their park experience with minimal nuisance.

Correspondence ID: 158 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 13:27:35

Correspondence Type: Web Form

Correspondence: Dear GGNRA:

Some of the restrictions proposed in your draft Dog Management Plan seem reasonable and as a dog owner, I can understand why they make sense. What I do find alarming about your plan, however, is the severe limitations it places n off-leash dog walking. I am most concerned about the restrictions proposed on Crissy Field East Beach.

Crissy Field East Beach is one of the most gorgeous, peaceful areas of our City. There is nothing like a stroll down the beach or along the path at that location and it is one of the reasons I love living in San Francisco. Walking

there with my dog is a wonderful, stress free experience because it is a large, beautiful area where dogs, people (even non-dog owners) and the environment co-exist happily. As with everything in life, things are not always perfect - there are times where a dog owner will behave irresponsibly. But when this happens, another dog owner that is present is the first to point out the problem in an effort to correct whichever rule was being broken. The fact of the matter is that dog owners are very vigilant about acting responsibly, but they monitor those around them as well because they are very aware of the repercussions the group as a whole might suffer because a few dog owners aren't being careful. I also see the contributions dog owners...and their dogs...make to the area. They routinely pick up garbage that has collected on the beach, for example. Perhaps instead of prohibiting off leash dog usage, using the environment as the main reason, you'd consider making more restrictive barriers to the protected areas you're worried about. If cost is the issue, I am more than certain dog owners would be willing to pay a dog tax.

Thank you. Anna

Correspondence ID: 159 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 13:56:21
Correspondence Type: Web Form
Correspondence: I favor implementation of Alternative B, implementation of the existing NPS leash regulation at all locations. The mere fact that these regulations were not previously in effect at these locations is irrelevant. All national park areas were at one time prior to their establishment as parks completely unregulated. The point of making them national parks is to protect them, which by its very nature entails putting restrictions on how they are used. The existence of a vocal and litigious community of dog-owners does not change the facts.

Correspondence ID: 160 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 14:25:20
Correspondence Type: Web Form
Correspondence: Presently, there is no meaningful enforcement on Ocean Beach, Sutro Heights Park, or Lands End: I speak to these three locations as I am most familiar with them, but I suspect my comments would be true of all locations. The preferred alternatives fail to address issues with dogs that are not truly under voice command. I would accept voice command if it were real, but in reality it is rare. Consequently, I would prefer leash laws, and enforcement of those leash laws, at all GGNRA locations, or the development of a specific set of procedures for issuing citations: I believe

these procedures should simply be observation of an unruly dog, or observation of a dog that does not immediately heel immediately after being summoned once by its guardian. In sum, the most important of the plan is to have strict enforcement.

Correspondence ID: 161 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 14:39:03
Correspondence Type: Web Form
Correspondence: I am writing in support of Dog Management Plan Alternative D for all areas. As a regular walker in parks around the Bay area, I am well aware of the problem associated with off leash dogs. Unfortunately few dog owners have true voice control over their animals. This lack of control results in deleterious impacts on the environment and constitutes a potential danger to other park users. I have been approached countless times by aggressive snarling dogs who pay little heed to their owners attempts to call them away. I am truly tired of the tyranny of dog owners who think it is some sort of god-given right to do as they please without consideration of the environment or other people. Thank you.

Correspondence ID: 162 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 14:57:55
Correspondence Type: Web Form
Correspondence: To Whom is May Concern,

The proposed restrictions on where dogs may or may not run free in this city are shocking, appalling and overly restrictive. As a responsible dog owner in this city, who has taken the burden of unwanted animals off of the city's tax payers and on to ourselves, my family, friends (many of whom also adopt unwanted dogs from city shelters) and I are adamantly against the proposed changes.

San Francisco is in the unique position of having the majority of our city parks within the overly rigid and ridiculous National Parks System (which my husband and I support both with annual donations and the purchase of annual park passes). The dog-friendly nature of San Francisco is part of what makes this city unique and part of what keeps many dog lovers living here.

I am disappointed to see that my tax dollars and donations, which have probably gone to many of the conservation efforts that are being cited as the reason for this change, are not being used to my benefit.

I can understand places like Lands End which is a pedestrian walkway being limited on on-leash dogs as well as a portion of Crissy Field which is often heavily populated by tourists and families with small children. But Fort Funston and Marin??? Really?!?! When was the last time anyone on this committee visited Fort Funston? If it was in the last five years you would know that 99% of the people there are responsible dog lovers who worship and appreciate Fort Funston as a place to enjoy with your off leash dog. There is semi-annual cleanup of Fort Funston by an entirely volunteer organization dedicated to a dog friendly San Francisco. Further, Marin was established as a park for the people.

I think you will find that restricting the use of San Francisco parks to on-leash or dogless people will cause more trouble than good. You will have an increase in aggressive dog incidents and more people breaking the rules, quite frankly.

The proposal is far far far too strict and should be loosened. You argue that it is a compromise but, it is not. It is driven by special interest groups and clearly for the sole benefit of dogless people and tourists.

I have to say that should this pass, as is, in a year, my contributions both to the National Parks will stop and I certainly will have less reason to stay in this city.

Sincerely,

Allison Taylor

Correspondence ID: 163 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 14:59:39

Correspondence Type: Web Form

Correspondence: I am opposed to the proposal of limiting off leash dogs on many historically dog friendly recreational walks, particularly on Crissy Field's East Beach. Like many San Francisco dog owners, I support protecting the environment and I agree with restrictions limiting the negative impact of people and development on wilderness areas. However I view walking my dog on the beach at Chrissy Field as an opportunity to enjoy our beautiful outdoor spaces while getting needed exercise for both myself and my dog and do not see the conflict between protecting the environment and allowing dogs to run off leash in an already developed section of the beach. The beach at Chrissy Field is not a pristine wilderness. It is in a highly developed part of the Presidio which itself is in a dense urban city. It includes man-made jetties, piers, sea walls, gravel paths, cafes, boardwalks and benches. Gas powered Park Service vehicles and lawn mowers are allowed to operate feet

from the beach in addition to hundreds of tourist bicycles, runners and walkers. The beach has paved parking lots at both ends and US Highway 101 is within a quarter mile. Existing fenced sections allow for wildlife and dune protection without preventing dog owners from giving themselves and their dogs much needed exercise walking a several mile loop. Dogs, like roads, parking lots and cars, help us to access the outdoors and should not be limited unless the benefit outweighs the restriction of access to our public spaces, which it clearly does not in this case. If the issue is not the environment but the of quality of life, restrictions should focus on those issues, and fines should be levied for irresponsible dog/owner behavior not simply allowing your dog off leash. Most dog owners, myself included, are the first to insist on responsible dog ownership which includes training and voice control, and socialization, as well as picking up after your dog.
Sincerely, Elizabeth Callander

Correspondence ID: 164 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 15:10:19

Correspondence Type: Web Form

Correspondence: I approve of the plan. Currently dog owners act as if the whole area belongs to them. Many have poorly trained dogs walking off lease and to whom they are paying little attention. They wander in front of pedestrians on the promenade, and then into the lot in front of cars, and are often not cleaned up after. Any dog area should be enclosed by a fence, or limited. While dogs should share our parks, they should not control them, as has become the case.

Correspondence ID: 165 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 15:16:05

Correspondence Type: Web Form

Correspondence: To Whom it May Concern,

I moved to San Francisco five years ago and one of my main pulls to the city was how accommodating it was to our canine friends. I moved to a house that did not allow dogs, and when I was new to the city and felt alone, I would go to Fort Funston as a way to alleviate my sadness. Seeing dogs in their natural habitat and running free gave me a sense of security and belonging. It also cured my nagging pup fix, since I could not have one of my own.

Now that I have a dog, I cannot imagine the city without dog parks/beaches. It is my, as well as my dog's, favorite part of the day. If you choose to extinguish these dog friendly beaches, you will sufficiently detract from the

overall draw of this amazing area. The level of canine acceptance sets us apart from other areas of the country and, in my personal opinion, makes us a better group of people.

In all honesty, the issue that has always wedged itself under my skin has been the amount of kids left unattended at public beaches. Dogs, while some could consider them nuisances, are constantly cleaned up after and minded, while children run amok and leave trash and other rubbish in their wake. When I am relaxing on a beach, I am much more irritated by naughty children than I am with dogs. Are you going to restrict beaches to adults only? If you are trying to alleviate irritants and pollutants, then perhaps you can pass a bill that excludes children as well.

Please don't take away these beautiful animals' right to run free.

Sincerely, Kate Lauren Rosen Berkeley High School English Teacher

Correspondence ID: 166 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 15:54:24
Correspondence Type: Web Form
Correspondence: Banning dogs on Chrissy field and Muir Beach is a bad idea based on flawed reasoning. What are the possible reasons to ban dogs: Dogs have negative impact on wildlife: Dogs have a much lighter impact on wildlife than their human friends. On my many visits to Muir beach and Chrissy Field I am constantly picking up human waste. Humans invade wildlife habitats, pollute the water and leave their trash everywhere. Let's ban Humans from Muir Beach and Chrissy Field!!! Why not do the reasonable thing and have stricter enforcement of litter laws and trespassing on 'sensitive' habitats. Dog's ruin most people's trips to the park: Well behaved dogs coexist peacefully with beach goers. In fact, most regular beach goers in the Bay Area are dog owners. Dog's get their owners out to the beach where they can appreciate nature and learn to be better custodians of our resources. True, ill-behaved dogs can ruin a trip to the beach. However, so can a rowdy, drunken person, or somebody who's smoking, or somebody blaring a radio, or ... Banning dogs will prevent a large segment of the population from enjoying THEIR public resources. Let's not prevent a large segment of the population (perhaps the largest demographic) from enjoying the beach because some others do not like dogs. GGNRA and CSP heavy-handedness: The GGNRA knows what's best for our native ecosystems and will work to re-create the pre-settlement landscape. Having lived in the bay area for 15 years, I am constantly shocked by the heavy-handed destruction of healthy eco-systems in favor of 'native' vegetation. I have seen several lovely landscapes in the presidio and marin headlands ruined by clear-cutting, permanent fencing, over-the-top trails, and other construction

projects. Sometimes, the best solution is letting mother nature take care of itself, rather than ripping out, building fences to keep people out and building trails to increase access. Banning dogs is in perfect keeping with GGNRA's perception that they are the experts and will save us from destroying our natural resources, when in fact, they are excluding the people who OWN the space from using it in a responsible way.

Correspondence ID: 167 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 15:57:31

Correspondence Type: Web Form

Correspondence: Most of my life in San Francisco, I did not own a dog, and in that capacity, I understand the problems with dogs off leash. I have been approached by fierce dogs running towards me, while walking on Ocean beach, not knowing what they would do. I observed a dog peeing on my kid's sand castle they made at Crissy Field beach, while I was worried to take a nap there, in fear my feet would be sprayed on. I have stepped on dog poop in some parks and cleaned off my sidewalk and the area around my tree in front of my house multiple times.

However, I am now am a recent owner of a dog for my family (2 daughters) and I understand the value of having an area where our dog can run free. Anyone that owns a dog understands the need of allowing a dog run off leash, allowing them to sniff where they want to and get some good exercise running and playing around.

The places I take my dog are Crizzly field and Fort Funston, and I would be very upset seeing these places taken away or severely restricted as a place to let our dog run free. I feel as a dog owner, we are already very restricted as is where we can take our dog; there are a lot more places where dogs are not allowed or required to walk on leash. As a result, the places where dogs are allowed to run free have high concentrations of dogs, which feels threatening to non-dog owners, and this is something that will get worse if space is restricted even more.

Dogs are very important in people's lives. Their companionship and unconditional love are essential to many people's emotional health. Because of the cost and challenge of raising children in SFO, many couples chose a dog as a substitute to fill their lives with joy, love, and companionship. Those that do decide to have children often move out of San Francisco. I've heard that there are more dogs in San Francisco then there are children. Therefore, I feel you need to preserve the amount of spaces where dogs can run off leash and I vote for the status quo.

Thanks you,

Walter Van Riel

Correspondence ID: 168 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 16:03:28
Correspondence Type: Web Form
Correspondence: I am very upset to hear that dog access will be further restricted in the future. I will be contacting any and all elected officials to express my anger over future restriction. San Francisco has a substantial population of dogs and limited current locations where they can be exercised. Further restriction will lower the quality of life of the residents of the City who pay significant taxes compared to most cities in the nation.

Correspondence ID: 169 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 16:07:01
Correspondence Type: Web Form
Correspondence: I support your Draft Dog Management Plan EIS. The EIS protects wildlife and protects people without dogs. Muir Beach and Rodeo Beach have become "dog parks", people without dogs who just want to enjoy a quite walk on the beach are intimidated by dogs running at yourself and at wildlife. The term "voice command" means that the dog owner lets his dog run free, the dog can chase wild life and run up to people. After the dog has disrupted wildlife or people, the dog owner can call the dog "back" if he thinks the dog has done anything disruptive, but most often the owner will say "he's a good dog, he won't hurt anyone". Maybe so but just a dog running up to me scares me first, how am I to know the the dog is "people friendly". I see dogs chasing birds and ducks on both beaches constantly in full view of the owners who do nothing to stop the dogs.

Please return the beaches and trails to people and wildlife. Thank you for this plan.

Correspondence ID: 170 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 16:09:09
Correspondence Type: Web Form
Correspondence: I strongly support the plan's proposal to require dogs to be on-leash in the East Beach area of Crissy Field. I am the mother of two small children and my kids are sometimes scared of all of the dogs running wild in that area. That beach is ideal for families and children because they can play in the

shallow water and it is next to the parking lot. When families are enjoying that area of Crissy Field, they should not have be concerned about dogs (1) scaring or attacking their children, (2) getting into their snacks and picnic food, and (3) urinating or defecating in an area in which children are playing.

Correspondence ID: 171 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 16:45:38

Correspondence Type: Web Form

Correspondence: I support of Dog Management Plan Alternative D for all areas. Although we need a "big tent" of support for our parks including dog owners, hikers, horse riders and others, there has to be reasonable balance between the park users. Walking in San Francisco Bay Area parks for over 40 years, I do meet occasional people whose dog(s) are off leash and under voice control. By far the majority of dogs, however, ignore their owners calls and make straight for me, often running, mouths open and barking. The owners usually say, "Don't worry, he/she is friendly." But how do I know beforehand when sharp teeth are a few inches from me? I have been bitten before in my life and do not want a repeat. Sometimes there is no owner even in sight and when they finally catch up with their pets they seem indignant that I am upset by being assaulted by their dogs!

Possibly the reason why dog owners do not have such a problem with other people's dogs is that dogs run to another dog not the owners. I have no dog so become the dog's target.

The dogs I see off-leash naturally chase about and so we rarely see the wildlife in our parks. That is a pity for multiple uses and is not necessary. It is also certain that being chased by a dog reduces the life span of many birds and animals, especially in winter when food and energy supplies are low in wild creatures but not in well-fed domestic dogs. So keeping dogs on a leash seems the least we could do for our wildlife in our parks

There is also the problem with dog waste. Although many owners do now pick up solid excretion, the urine remains to pollute out soils and especailly surface waters. I see no answer to this problem excetp to keep all pets out of the parks as occurs in most national parks.

Please keep free-running dogs out of our parks. Let's have the dog owners walk their pets in our parks and run their dogs off leash in specially designed, fenced dog parks like the one at Point Isobel in Richmond, CA. Everyone seems happy with this solution.

Correspondence 172 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,18,2011 18:08:19**Correspondence Type:** Web Form**Type:****Correspondence:** The proposal to require dogs on lease in all areas of Crissy Field is ridiculous! As a resident of SF since 1983, I have visited Crissy Field almost daily with my dog.

It is the most wonderful part of the week - for me and her. My kids have grown up playing with our dog on the beach. I have a constant running partner. We are clean and pick up after her.

Do not take away such a joyous experience. It's the little things in life that make us rich - this tiny bit of freedom makes our lives better.

Correspondence ID: 173 **Project:** 11759 **Document:** 38106**ID:****Received:** Jan,18,2011 19:04:43**Correspondence Type:** Web Form**Type:****Correspondence:** I would like the exact cost of the 2400 page document made public and the number of employee hours involved'

Further,I would point out that the GGNRA is not a national park, but a national RECREATION area and importance should be placed on the large numbers of people, many older and/or disabled or merely not fit enough to ride 70 miles in orange spandex on their \$5000 bikes, whose recreation is walking the beach, interacting with other dogwalkers, and enjoying the unique beauty of free dogs at play.

There appears to be a disturbing trend by the NPS to overmanage the Muir Beach area in particular. An example is the expensive and totally irrelevant fencing at the Overlook resulting in a manicured "look" that apparently appeals to "planners".The wanton destruction of trees during the Creek project is a further assault on the community feel. Removing dogs from the beach and trails looks better on paper, but this area is a community as well as part of a recreation area and the beach is the center in many ways - complete with our dogs. Please show some respect for the character and charm of this unique spot and try to sublimate the urge to "manage" us.

Correspondence ID: 174 **Project:** 11759 **Document:** 38106**ID:****Received:** Jan,18,2011 19:48:28**Correspondence Type:** Web Form**Type:****Correspondence:** I am African-American and have family members with disabilities. Many of

my African-American friends do *not* patronize the recreation areas because dog owners have literally taken over the areas and make visits uncomfortable for us. For various reasons, many people of color already don't use national parks enough. Leaving the current untenable dog-running wild situation at the recreation areas is yet another impediment to our rights to enjoy the parks.

Additionally, the current situation denies our family members with disabilities a reasonable access right to the parks. I have two family members who are very sensitive about unleashed dogs and who we cannot bring to the parks for that reason. Just because a dog owner says his/her dog is friendly or "will not bite or hurt you" (a common refrain when we express concerns about unleashed dogs), we have no idea if that's true or not, and even if it is true, it's irrelevant to our family members concerns.

Of course, many dog owners are responsible, And dogs have a right to get exercise. A very, very reasonable compromise is to provide, as the plan does, for fenced dog areas. It is ironic and irresponsible that dog owners would reject such a reasonable compromise. It makes little sense and is totally inappropriate for owners to put dogs' needs ahead of human needs. The plan gives access to both non-pet owners and pet owners in a sensible fashion.

Correspondence ID: 175 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 20:18:35
Correspondence Type: Web Form
Correspondence: There are precious few places where dogs can be safely and legally walked off-leash. Please don't take one of the last, and nicest, Fort Funston, away from us. Having acceptable places is good for everyone: our furry friends, the people who walk them (it promotes health), and the people who don't want off-leash dogs around. Providing an acceptable venue removes the temptation to walk dogs off-leash where it is not appropriate. Please let there continue to be this tiny space for our best friends.

Correspondence ID: 176 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I have been walking my dog(s) at Chrissy Field since 1979. Since this time I have seen the beautification of this area though it has always been an incredible spot. Part of the beauty of this experience has been the relative peace, the overwhelming natural beauty and the sense of freedom that one enjoys while walking on the edge of the Bay. My dogs have always been

well trained, under voice control at all times and have been able to play with their friends off leash. This magical part of the day watching the unabandoned joy of dogs playing is one of the best parts of my day. The people that one meets in this fashion is also a wonderful way in which san franciscans of all ages and backgrounds can meet and share in the mutual interest of their dogs. There is no doubt that there are peak hours and days and generally I avoid those times as that is not what I am looking for.

I feel that other people's preferences may be different than mine, but we live in a society that tries to honor everyones point of view. I feel that mutual respect is demanded and I do not see why leashing dogs has become the panacea for problems with this issue. Recreational dog-walking and other peoples enjoyment of Crissy Field are not mutually exclusive.

Correspondence ID: 177 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 21:10:21

Correspondence Type: Web Form

Correspondence: I think areas for dogs should be preserved in GGNRA such as Crissy Field and Fort Funston. I don't even own a dog but this is just common sense! There are miles and miles of coastline where dogs are not allowed. Why take away this small area for people and their dogs to enjoy? There are other areas people who don't like dogs can go.

I heard about this issue from my co-worker who likes to take her 15-lb dog to Fort Funston.

Correspondence ID: 178 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 22:01:50

Correspondence Type: Web Form

Correspondence: I am glad to see this dog management plan as my family and friends have been always restricted to certain parks to visit safely especially with our small children. I prefer NO DOGS at all in any public parks. Dog owners do not respect or understand our dog fear issues. Even though their dogs may be friendly, it doesn't matter for children who fear any dogs. From our experience with off-leash dogs in the parks, they are not always verbally controlled. Worse than that, dog owners do not bother to control their dogs not to come to the children because they think their dogs are friendly, not understanding dog fear children may have. In fact, our children's dog fear has escalated because of irresponsible dog owners with off-leash dogs chasing our children.

Unleashed dogs have ruined our lunches by licking or jumping. Such dogs

were controlled verbally only after the incidents. But they did not put their dogs on leash despite our requests to put them on leash while they were letting the dogs play at the picnic area.

Leashed dog policy doesn't really protect public safely either. Nowadays dog walkers use extendable long leash with which dogs can freely walk right up to children unless thoughtful dog walkers control their leash short.

I hope NPS would advertise more about this issue so that more people who have been affected negatively by dogs are notified and can comment for NO DOG or most restricted policies. If you are getting more comments from dog owners, then that's not fair representation of public.

Of course, nature and wildlife should be protected for future generation.

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| Correspondence ID: | 179 | Project: 11759 | Document: 38106 |
| Received: | Jan,18,2011 22:40:32 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Hello- I am writing to support this proposal. Thank you for your efforts to bring a reasonable compromise to the table. I think this is a fair decision-- there will be areas that dogs are free to be off-leash, but other areas where they are on leash. Not all dogs are well controlled by their owners and it's good to know there will be some areas for folks to enjoy without worrying about interference from off-leash dogs. | | |

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| Correspondence ID: | 180 | Project: 11759 | Document: 38106 |
| Received: | Jan,18,2011 23:10:14 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | To whom it may concern, Please keep the east beach on Chrissy field open to off leash dogs. The experience of walking on the beach with my dog is one of the all time great San Francisco experiences for this native. Providing the variety of activities at Chrissy field has turned that area into our Central Park. Please maintain the diversity of activities on Chrissy. thank you, E Tobin | | |

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| Correspondence ID: | 181 | Project: 11759 | Document: 38106 |
| Received: | Jan,18,2011 23:14:31 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Regarding the plans for Muir Beach, your Preferred Alternative totally bans dogs from the beach. There is absolutely no logical reason for this. | | |

My preferred alternative is Alternative A, which would require dogs to be on leash adjacent to the environmentally sensitive areas, but would leave the beach available for voice control. This would still be easily enforceable by park personnel. With appropriate signage, visitors w/ dogs for the most part would keep their dogs out of the sensitive areas. The higher dunes, lagoon area, riparian areas, and trails can easily be marked for banning dogs or keeping them on-leash on trails. Sensitive areas could also be fenced off in an environmentally friendly manner to keep people and dogs away. When fish are running in the creek, it could be posted to keep dogs out during that brief period.

Muir Beach has been known as a dog friendly beach for decades, long before GGNRA ever existed. People are much more destructive than dogs. Most dog owners are responsible, and are usually environmentally aware and supportive. If you go to Muir Beach on a weekend, dog owners have their dogs under voice control and clean up after them. The only problem I have seen is the trash left on the beach by humans. And I am not aware of any dog who has left a cigarette butt on the beach or dug fire pits in the sand - again, humans are the culprits, not the dogs.

The choice of having to go to Rodeo Beach is a slap in the face of dog owners. It is not safe for dogs near the water, whereas Muir Beach is frequently low-surf and dog-safe. Why not have two beaches as off-leash voice control areas?

A compromise for Muir Beach is the best alternative. A total ban on dogs, which is what your "Preferred" Alternative is, is just unfair. By the way, who "prefers" that alternative? What citizens who use the beach were asked to weigh-in on that plan? How many citizens were able to have a say in that alternative? As of this last Sunday, Jan. 16, 2011, there was no visible public posting about this plan. Why is that? I heard about this proposal through word-of-mouth, from someone who read an article about it in the IJ. This proposal needs to be posted at the beach, w/ directions for the public on how to respond.

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| Correspondence ID: | 182 | Project: 11759 | Document: 38106 |
| Received: | Jan,19,2011 00:45:47 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | The proposed plan to severely limit the amount of off-leash territory within the Fort Funston Recreational Area is, plain and simple, a terrible idea. I would imagine that most of the people who are using Fort Funston are dog owners who live in an urban environment. Lot sizes are typically 25' x 120' in San Francisco, so it is not like a pet dog will have sufficient room in a | | |

yard to run at full speed and just to be a dog. We have been going to Fort Funston for many years with the various dogs we have owned. While there may be a few dogs that have adjusting to the social situation out there, the vast majority of dogs are perfectly well-behaved off leash. If a dog cannot behave properly toward other dogs and humans, then he/she should be leashed. It doesn't mean that all of the dogs should be leashed. If people don't want to be near unleashed dogs, they should go to the 99.9% of the city that does require a leash.

The tiny off-leash area is a joke and is much, much too small given the available space out there. Dogs need to run in large open spaces and to have the room to socialize, leave a bad situation if it arises, and the proposed space will provide neither of those things. If anything, it will do the opposite.

Please leave Fort Funston the way that it is.

Thank you for listening.

Correspondence ID: 183 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 01:09:01
Correspondence Type: Web Form
Correspondence: While there may be a need to reassess the dog "zoning", the changes seem drastically skewed towards increasing on-leash restrictions and decreasing accessible areas. Of particular disappointment is the fact that many of the trails designated for on- or off-leash walking do not connect or do not create loops. It would be better to have a designated series of trails from a centralized starting point (e.g. Rodeo Beach or Donahue) that can provide owners with a variety of distances and terrain to walk their dogs. I urge you to reassess the proposed dog-friendly trails. It would be a travesty to see Fort Funston change from the dog-heaven it currently is.

Correspondence ID: 184 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 09:51:02
Correspondence Type: Web Form
Correspondence: I have concerns over the areas being limited by dogs off leash. Penalties should be applied to the ones that violate the off leash rules. If you take away these areas, there will be more dog fights with the crowding. Many persons that are disabled enjoy the comfort of a their animals. They provide mental health stimulation also. The dogs need places they can run. Several of the areas you are restricting the dogs and owners enjoy for stress relief and mental well being. Some owners are disabled and can only go in areas

that you are restricting. They may have to walk with canes or W/C. Thanks for your time.

Correspondence ID: 185 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 11:12:05
Correspondence Type: Web Form
Correspondence: I feel that the new proposals greatly limit the areas available for off leash dogs. Particularly Ft Funston, Ocean Beach, and Crissy Field. These are ideal locations for dogs to enjoy running free and they should remain so.

Correspondence ID: 186 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 11:32:24
Correspondence Type: Web Form
Correspondence: As a dog owner, I am not fond of, nor do I support off leash areas for dogs in general, unless they are a dedicated dog park. I do however support increased National park access for dogs on leash only. Reponsible dog owners like myself should not be punished or excluded due to the lack of consideration of a few individuals.

Offleash dogs create a hazard for wildlife, hikers, bike enthusiasts, and other dog owners. While some owners may argue that thier dog is "well behaved", and causes no problems, that is entirely subjective. What is well behaved to one may appear out of control to others. Additionally, dogs off leash create problems for on leash dogs, as the dog on the leash may feel at a disadvantage, and become aggressive, which leaves the poor leash holding dog owner in a position to try and not only control thier dog, but the dog that is off leash as well.

In short, allow on leash access, increase the areas open to reponsible dog owners, and eliminate off leash access altogether. Enforce the law with fines, and generate some much needed revenue for the park system.

Correspondence ID: 187 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 11:39:54
Correspondence Type: Web Form
Correspondence: Access to beautiful beaches, parks and other outdoor spaces is a huge part of what makes living in the Bay Area so great. There are thousands and thousands of dogs living within Bay Area homes - in fact some statistics show that there are more dogs than children in San Francisco - and being able to share recreation with our dogs in these great outdoor spaces is both a

joy and a necessity for both the dogs and their owners. I understand that not all dog owners are as responsible as we'd like, but the vast majority of people understand the importance of responsible dog ownership and make sure that their dogs behave in an appropriate and safe (for everyone) manner while in public places. On-leash walks are okay in a pinch, but do not allow dogs to run and play and get real exercise. If anything, we need more places where we can let our dogs off-leash, under our supervision of course.

Taking away our access to leash-free recreation areas will greatly impact the quality of life of many, many residents (and their dogs) and I hope you seriously consider the bigger repercussions of this plan before implementing it.

Correspondence ID: 188 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 11:51:52
Correspondence Type: Web Form
Correspondence: Recently I decided to join and support the NPS through membership, but am very surprised and disappointed at the proposal to limit dog walking if not outright ban dog walking in certain areas. We live in Marin County and this is an extremely dog friendly area and is one of the best for families with dogs. We all believe in protecting wildlife but we also believe in protecting existing rights to dog walking. If other wildlife truly need protection, please do so in the least restrictive way regards to dog walking. If dog walking becomes terribly restrictive, then the pendulum will have swung too far the opposite way and will impact may family dogs and families themselves by not having places to dog walk which is completely unacceptable. In fact, more places should be open to responsible dog walking. We have a 4 month old dog that we have been taking to classes at the Marin Humane Society for obedience and will certainly have a dog under voice control and encourage that be a requirement, but will not support bans and greater restrictions. I know we feel as strongly as the majority here in Marin.

Correspondence ID: 189 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 12:51:50
Correspondence Type: Web Form
Correspondence: In order to enhance the enjoyment of all users of public areas, especially national and state parks, I am in support of restrictions placed on dog owners / dog access. Thank you and best of luck in your efforts! - SEE

Correspondence ID: 190 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 12:52:05

Correspondence Type: Web Form
Correspondence: Hi,

It is very important to me to have space available for my dog to run free and the Golden Gate Recreational area is a wonderful space. Please consider keeping the laws the way they are.

Thanks, jess

Correspondence ID: 191 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 13:45:18
Correspondence Type: Web Form
Correspondence: Dear GGNRA:

RE: GGNRA Draft Dog Management Plan

I urge you to maintain the current open areas and allow dogs to have several areas throughout the Bay Area to run free. Maintaining the off leash area is very important to the health of our pets and the community.

Regarding the limit of dogs for the Professional walkers (licensed, trained, insured walkers), I strongly support that up to 8 dogs per walk is fine for those licensed professionals. I am fine with any additional licensing for each individual dog.

Thank you for your careful consideration this matter.

Sincerely, Marcy

Correspondence ID: 192 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 13:49:57
Correspondence Type: Web Form
Correspondence: I am a San Francisco parent with kindergarten aged twins.

I am in favor of the proposed changes. There are many parts of GGNRA that we simply cannot use because they are overrun with off leash dogs. One of my kids is very fearful of dogs. Everywhere we go, we find that dogs are running up to us. As my daughter cowers in fear, the dog owner usually says something like "oh, he's very friendly." That doesn't matter, my daughter should have the benefit of using our public parks without fear of having her

personal space intruded upon by "friendly" dogs.

We can't even go to Chrissy Field, Ocean Beach, Baker Beach, etc. because of the off leash dogs. One time we tried the beach at Chrissy Field only to be overrun by dogs. As I carried my crying child away, one dog owner, said "don't come to this beach if you don't like dogs." I like dogs fine, I even used to have a dog, but this really has to stop. Give the dogs a safe enclosed area of their own to run off leash. They shouldn't be allowed off leash everywhere.

Thanks.

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| Correspondence ID: | 193 | Project: 11759 | Document: 38106 |
| Received: | Jan,19,2011 14:42:05 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I applaud your efforts! I am not a dog owner, but appreciate responsible ownership. | | |
| | I approve of increased restrictions, especially in wildlife sensitive or heavy use areas. Having lived near Fort Mason for a couple of years, I am in favor of Alternative C - ROLAs. There are quite a few dog owners in the area who want to walk to an area for their dog, and I feel like the ROLAs would be appropriate. This would reduce the tendency to violate off-leash restrictions on the Great Meadow. If there are no ROLAs, I feel that people will be more inclined to ignore the rules unless there is heavy enforcement. | | |

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| Correspondence ID: | 194 | Project: 11759 | Document: 38106 |
| Received: | Jan,19,2011 15:24:13 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | This is an unnecessary plan that continues a long process by government of taking away citizen rights and enjoyment from the majority so that you can pacify the more vocal minorities. An overwhelming majority of dog owners are responsible people who clean-up after their pets and have control of their animals. Stop wasting our taxpayer dollars on 2400 pages of ridiculous new rules! The current restrictions are more than are needed and should be loosened, not tightened. | | |

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| Correspondence ID: | 195 | Project: 11759 | Document: 38106 |
| Received: | Jan,19,2011 15:43:12 | | |
| Correspondence Type: | Web Form | | |

Correspondence: Please keep the parks open and accessible to dogs and people who and care for them. So little of the city has space for dogs as it is, to further limit the spaces available for dogs to run and play would be a tragic loss of my rights as a dog owner and citizen of the county and state. Jules Wilt

Correspondence ID: 196 **Project:** 11759 **Document:** 38106

Received: Jan,19,2011 15:44:51

Correspondence Type: Web Form

Correspondence: As a long time resident of San Francisco as well as a dog owner for many years one of the things I love about living here is that despite being the resident of a city I still have the ability to take my dog out for real exercise within a few minutes walk or drive. This city is unique in that you never feel cut off from water, green or areas of outdoor activity. Many people--myself included--continue to live here in spite of the expense because these resources are available to us and our pets.

As the owner of a large dog who lives in the city I, like many, do not have a yard for the dog to get adequate exercise and no matter how many hours I walk him the amount of exercise he can get on leash is not enough.

I think it would be wise to consider the demographic that exists in San Francisco--many people who start families opt to move to the North Bay, East Bay , etc., leaving a large number of active, single or couples without kids, many of whom consider their dogs their children. This is the same demographic that spends a great deal of money going out to dinner, shopping and otherwise bringing much needed cash flow into the local economy.

In fairness, I think that irresponsible dog owners should be penalized--this includes those who don't clean up after their dogs, those with dogs not under their control and especially those with aggressive dogs. Aggressive dogs are not appropriate for off leash areas under any circumstances and those owners who put others at risk deserve harsh penalties. The suggestion of having a few small areas for off leash play is a recipe for disaster--the inevitable outcome is an overcrowded area with a bunch of hyped up dogs and not enough space...not a good situation for anyone.

I take my dog to Chrissy Field almost every day. He runs on the sand, swims and plays with other dogs. We also go to Ft. Funston on weekends. Without the ability to conveniently take my dog out I would seriously reconsider paying the excessively high costs of living in the city--if I were to need to drive over a bridge simply to let my dog play what would be the point??

I would strongly request that this plan be reconsidered. There are better alternatives that will allow non-dog people (because in reality that's really what this is about) to enjoy the park without feeling encroached upon.

Correspondence ID: 197 **Project:** 11759 **Document:** 38106

Received: Jan,19,2011 16:11:01

Correspondence Type: Web Form

Correspondence: I oppose the draft plan submitted by the GGNRA on the basis of the restrictions placed on dog owners visiting Chrissy Field. In the current plan, dogs will not be allowed off-leash along the best beach areas at Chrissy Field. I have two labs who love to fetch their balls and romp in the water. They get fabulous exercise at Chrissy Field, in part because they are so excited to be there and to run in the waves. The slope of the beach is perfect for the dogs, who can chase each other and frolic in the waves without the worry of a steep drop-off or dangerous waves.

We only visit Chrissy Field in the morning. At that time of day, unless it is a particularly warm day, the dogs and dog owners vastly outnumber sunbathers. Even so, I walk my dogs on their leashes down to the water, take them off their leashes when we have reached the water, and put them back on their leashes to travel back through the sandy area to the parking lot. We pick up after our dogs, make sure they do not enter any protected areas, and confine them to the shoreline to alleviate any concerns of sunbathers.

If it is determined that it is necessary to impose restrictions at Chrissy Field, I believe that a far better approach would be to confine off-leash access to certain times of day. For example, if dog owners had access to the beach from 8-11 am in the winter and from 7-10 am in the summer, and possibly for another hour at an appropriate evening time, everyone's needs could be met.

Thank you for your consideration of my comments.

Very truly yours,

Marta Cervantes

Correspondence ID: 198 **Project:** 11759 **Document:** 38106

Received: Jan,19,2011 16:46:52

Correspondence Type: Web Form

Correspondence: I am very saddened to see you trying to eliminate all off leash locations for

our dogs to run. I visit San Francisco quite often since my daughter lives there. We visit the Marin Headlands and Crissy Field with our dogs. Eliminating these resources would be a big mistake. Please do not take this away from us !!

Correspondence ID: 199 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 16:50:54
Correspondence Type: Web Form
Correspondence: The draft Dog Management Plan appears to have been thoughtfully developed. It takes into consideration the different and at times conflicting needs of various constituents, and has arrived at workable conclusions. I support the plan as contained in the draft.

Correspondence ID: 200 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 17:01:32
Correspondence Type: Web Form
Correspondence: With off-leash areas dwindling everywhere, I have to come all the way from Oakland for beach access and good walking paths for my dog and I both to exercise. I am distressed to see it threatened, and for no good reason. The more we are forced to keep dogs indoors with nowhere to run, the worse their manners and social skills will be, leading to fewer and fewer pet dogs. Perhaps that's your intent (PETA, anyone?).

Dogs need to exercise, and for that they need room to run, and room to keep appropriate social distance from other dogs who show up. The smaller and more cramped it all is, the less useful and healthful it will be. Keep the fields open, and honor your many dog-owning residents near and far.

Correspondence ID: 201 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 17:09:50
Correspondence Type: Web Form
Correspondence: 1. Muir Beach: I prefer Alternative A. I have been using this beach for years to recreate with my dog and I see no problem with the current practice of voice control on the beach. I have never witnessed conflict between dog-owners and other users. I have never seen aggressive dogs or poorly controlled dogs. The beach is clean and owners clean up after their dogs.

"B" and "C" look identical to me. Is there a difference?

2. Rodeo Beach: I prefer Alternative A. The trouble with the ROLA

"preferred" option is that a few non-compliant individuals could ruin it for the rest of us. Management could decide to close the beach to dogs at any time due to non-compliance. Why let a few bad eggs ruin it for the rest of us? Instead, enforce the rules of voice control and punish only the wrongdoers.

3. Marin Headlands Trails: I prefer Alternative A. It is the only option that allows dogs on the Coastal Trail/Wolf Ridge/Miwok loop. There is no other alternative that allows for a loop trail experience of moderate length (about 4 miles). All other trail options, whether voice control or leash options, offer only shorter loops (.75 miles around the lagoon) or trails that require doubling back to approach the 4 mile desired length. The trouble with Headlands trails, in general, is that there aren't enough loop trails of moderate length. This is the only hike in the area that fits that bill. I would love to be able to continue hiking it with my dog.

"B" and "D" look identical to me. Is there a difference?

Thank you for the opportunity to comment.

Correspondence ID: 202 **Project:** 11759 **Document:** 38106

Received: Jan,19,2011 17:15:37

Correspondence Type: Web Form

Correspondence: My female shepherd-lab is 15 (I'm happy to report) and she has been my companion for walks at Baker Beach, Fort Funston, Chrissy Field, and Stern Grove for all of those years. I raised my three children in the city, and two of the three have also acquired dogs as companion animals now that they've reached adulthood; they also use these same off-leash areas, and we often enjoy walks together with our dogs and their children, as a family. I am an attorney, and would like to share a legal principle that I think applies to the alternatives proposed in the GGNRA Draft Dog Management Plan: Equitable estoppel. This legal doctrine serves to "estop" someone from making a legal argument or taking an action that affects another's rights when four elements are present. In this situation, I believe that the GGNRA is estopped from radically restricting off-leash access by residents of the affected areas and their companion canines because these elements apply, as follows: (1) the party to be estopped (in this case, the GGNRA) was apprised of the fact that dog ownership has been growing exponentially in all of the areas affected by this proposal; (2) the GGNRA intended that the liberal off-leash policy be acted upon, or acted so that the parties asserting the estoppel (in this case the dog owners) had a right to believe it was so intended; (3) the dog owners were ignorant of the true state of facts, that being that the off-leash area could be radically restricted; and (4) the dog owners relied upon the conduct of the GGNRA to their detriment. I don't

believe it is an exaggeration to say that 10s of 1000s of people in the affected counties, including me and my family members, have relied to our detriment on the amount of off-leash area available to us when we made the decision to acquire a companion dog. Many were ignorant of the fact that the GGNRA could effect the drastic curtailment of off-leash dog park area proposed here and, if the most restrictive alternative is adopted, will face a bleak reality. If the most restrictive alternative is adopted by the GGNRA, there will be severe, really unimaginable, overcrowding in the remaining off-leash areas (for example, Stern Grove). This is what causes problems -- too many dogs in too little space. I am a responsible dog owner. Ninety-nine percent of the dog owners I encounter on my daily off-leash walks are equally responsible. The only problems I see are with dogs who have not been spayed or neutered. Perhaps a less restrictive alternative would be to require that all intact dogs be on leash on GGNRA property. As a 60-year-old woman who relies on my daily off-leash walks as the centerpiece of my physical and mental health regime, I'm imploring you to retain enough off-leash, voice control area so that I, and the 10s of 1000s of other responsible dog owners in the affected areas, can continue to safeguard their own health and the health of their dogs with off-leash walks of sufficient length so that those health benefits can continue to be accessed. Despite severe arthritis in my elderly dog, and my own mild arthritis, both of us are active and healthy, primarily because we can walk on dirt or grass, rather than concrete, for a mile or two each day. Overcrowding in off-leash areas will effectively exclude older dogs like mine who cannot see or hear well, and therefore will, quite simply, be knocked down and quite possibly injured by the younger, more active dogs. My dog likes to sniff and explore. I like to keep up a steady, rapid pace so that I derive full health benefits from my walk. My needs and that of my dog can only be mutually met if we are not joined by a leash. Not to mention our social needs. My dog is running freely with another dog, getting the vigorous exercise she requires, while I am visiting with the dog owner. Many many residents of the affected areas, like me, derive the majority of their social contact from the dog park. Human connections are made there that benefit the community as a whole. Dog connections are made there that provide the essential socialization that ensures that the dog will function well in both human and dog communities. Leashes interfere with these connections, plainly and simply. Please...please, leave us the off-leash area we require to be happy and healthy.

Correspondence ID: 203 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 18:23:04
Correspondence Type: Web Form
Correspondence: I would like to see statistics of dog attacks in these areas, because my perception is that such issues are very rare, and we cannot legislate based on fear alone.

Even if there are official public safety data to sustain the theory that unleashed dogs present a constant danger to general population, I would like to see a proposal that offers alternatives and some level of compromise. Maybe some days of the week days could be with leash, some without. Or maybe we could split the areas, 1/2 on leash, 1/2 without leash...

It makes me very sad to imagine all dogs & dog owners condemned to lack of exercise and happiness...

Correspondence ID: 204 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 00:00:00
Correspondence Type: Web Form
Correspondence: GGNRA are key places where people can let their dogs off-leash.

Correspondence ID: 205 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 19:03:54
Correspondence Type: Web Form
Correspondence: Hello, I would like to add to your list of open areas where dogs should not be allowed to be off-leash. I'm talking about the beach at San Quentin. It is a very small beach and there are too many people bringing dogs to this beach where families and small children come to enjoy their day. My small dog has been attacked 5 times from dogs at this beach. I live here. Its not fair to me or to other small dogs that tend to be mistaken for a cat. I have seen a number of dog walkers bring up to 5 dogs on this beach. They don't pick up after their dogs. The beach is left filled with dog poop almost every day. I worry about little kids being exposed to poop. Most of the people that come down to the beach like to swim. I have seen dogs pee and poop right in the water next to small children. Its just not safe for people and dogs to mix together at this beach. Please consider making it mandatory for people who want to bring their dogs must keep them on leash at our small beach. Its just too small and too dangerous for dogs to be off-leash at our beach.

Thank you for your consideration

Correspondence ID: 206 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 19:32:55
Correspondence Type: Web Form
Correspondence: I am opposed to the draff regulations which further restrict the ability of responsible dog owners to enjoy public recreation areas. The number of locations where dogs can be off leash and under ice control should be increased, not furer restricted.

Correspondence ID: 207 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 00:16:29

Correspondence Type: Web Form

Correspondence: I am a frequent visitor to Crissy Field and Fort Funston as well as other GGNRA areas. I visit these places because of the restrictions in Sonoma County. There is only one private beach near me (Dillon Beach in Marin) that I can take a dog off leash. Dog walkers are also hikers, and we need places to walk and hike our dog off leash. Small dog parks are fine for small dogs perhaps, but I like to hike with my dog. So many places are already off limits to dogs such as all California state parks. The majority of dog-owners are responsible and clean up after their dogs. Some dogs do disturb wildlife, but in all my years of hiking with my dog, I've never observed any dog attacking birds. We can all share in the parks. Let's keep our off-leash areas!

Correspondence ID: 208 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 10:18:50

Correspondence Type: Web Form

Correspondence: I agree with the National Park Services efforts to either ban dogs completely or allow dogs only on leash in designated areas in the GGNRA. Thank you.

Correspondence ID: 209 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 11:12:25

Correspondence Type: Web Form

Correspondence: As a resident of Muir Beach, I strongly endorse Alternative A (voice control for dogs). I also strongly endorse Alternative A for Marin Headlands Trails.

As part of your analysis, please understand the Muir Beach is a neighborhood with close communal ties. It is also a community with responsible dog-owners who very much respect and appreciate the surrounding natural beauty. As such, banning or restricting dogs from Muir Beach and the surrounding areas would have a harmful impact on the social ties of this community. Further, I have discussed these proposals with several environmental consultants. They agree that additional dog restrictions or bans would not significantly reduce the environmental impact....so long as dog-owners abide by the signs that indicate sensitive areas. As a daily beach-visitor, I can attest that dog-owners are overwhelmingly compliant and respectful?and they do abide by these signs. There is no need to implement new laws as self-policing as well as current

law enforcements are more than adequate deterrents.

Thank you, Brian

Correspondence ID: 210 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 11:37:53
Correspondence Type: Web Form
Correspondence: It would be a real shame to restrict all park areas to dogs on leash or banning dogs altogether. I appreciate the need to strike a balance between dog owners/dog lovers and those who prefer to enjoy recreational activities without dogs in the vicinity. Please keep some parks, particularly Fort Funston and parts of Crissy Field, open to dogs off leash. It's important for society. Thank you.

Correspondence ID: 211 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 11:56:20
Correspondence Type: Web Form
Correspondence: To whom it may concern, regarding the Draft Dog Management plan for the Golden Gate National Recreation Areas:

My dog and I have visited Fort Funston an average of two or three times per week for the last five years, while we have been residents of the Merced Heights neighborhood. As I have walked my dog literally over 1,000 miles on that beach, off-leash and under voice control, and as I continue to be a regular user of the recreation area, I hope that my comments will be given due consideration.

I appreciate the need for review of dog policy in our parks. Environmental protection and sustainability are crucial considerations, as is human safety. I deeply hope that the review board is able to institute new regulations that are beneficial to the preservation of the environments, while also not impinging on residents' ability to walk dogs off-leash.

It is critically important to provide large spaces in which residents can walk dogs off-leash. Most breeds of dogs (especially medium or large-sized dogs) are difficult or impossible to adequately exercise on-leash. Not all dog owners are able to run long distances with their dogs, including the elderly and disabled. Those people should still have a right to own dogs, and to take those dogs to places where they can run and play freely. San Francisco is a compact city where many residents have little or no backyard space of their own, and most private parks and athletic fields don't allow dogs, or are on-leash only. This is why it is so important to continue to dedicate a portion of

our public recreation space to dog owners.

Dogs that are inadequately exercised develop behavioral problems such as barking, digging under fences, and biting, as ways to burn off energy and stave off boredom. Dogs that are well-exercised are happy and well-behaved. I fully believe that this is why the frequency of bad incidents related to dog behavior at Fort Funston is extremely low: dogs who visit Fort Funston regularly are healthy, happy dogs. In five years of very regular visits to Fort Funston, I have never witnessed a violent incident between dogs. The vast majority of dog owners I see there either exercise responsible voice control, or keep their dogs on-leash.

Dog walking is also valuable exercise for people. In this day and age where obesity is epidemic, one of the most important services our local parks can provide is an incentive for people to get out and walk. This is why I think it would be tragic to limit the voice control portion of Fort Funston and other recreation areas to small spaces. Walking their dogs gives people a reason to get out of the house and get some exercise. It is a sad idea to take that incentive away, or to limit dog-walking to a small fenced area where there is no room for people to walk.

I also strongly oppose the limiting of voice-control areas at local parks other than Fort Funston, because reducing off-leash access at one place will only over-crowd the remaining options, leading to more rapid environmental wear-and-tear. If anything, we should expand the amount of space available for voice-control dog walking, thereby spreading out the environmental impact.

A quick glance at all local recreation areas and nature preserves makes it clear that most outdoor areas disallow dogs fully or are on-leash only. There are ample spaces available for non-dog-owners to enjoy. Dog owners have few choices already, and I sincerely hope that the new policy will not limit them even further.

The fencing and signage for habitat restoration areas at Fort Funston is inadequate. The fences are broken and buried in many places, and they are not dog-proof fences in the first place. People disregard the boundaries because the boundaries aren't clear. It does not seem to me that it would be all that difficult or expensive to build and maintain adequate fencing and signage in the parts of the park that are being reserved for habitat restoration or breeding of sensitive species. I would strongly support the allocation of park resources to determining and maintaining these boundaries.

I would also support limitations on the number of dogs that can be walked at a time by a single person. Professional dog walkers are pervasive during weekday hours at Fort Funston. While most of them are good at keeping

track of their dogs, I often see that it is hard for one person to keep adequate track of the waste produced by 10 or 15 dogs at once. Their environmental impact is also obviously disproportionately large, as compared to residents walking their own dogs. Since professional dog walkers are using the recreation area as a key component of earning their livelihood, it makes sense to me that they should pay a reasonable fee for that use, and that there should be permits required for walking more than a few dogs at a time.

Personally, I would be willing to pay an annual membership fee in exchange for the right to walk my dog under voice control at the recreation area. It's a hugely important part of my life. It is my dog's favorite thing to do, and the several miles we walk there two or more times per week are an important part of my weekly exercise regimen. Fort Funston helps keep me and my pet healthy, along with the hundreds of other dogs and dog owners who walk there on any given day. Please do not take that away from us.

Plan A for Fort Funston, which preserves the way that the space is used now, is the only alternative that is viable. Additionally, please note that the current and already large volume of traffic supported by Fort Funston would only increase if voice-control access was restricted at other areas. Therefore I am asking you to preserve voice-control access that exists now in all areas relevant to the Draft Plan, and to consider expanding access rather than restricting it. I also urge you to build and maintain adequate fencing and signage for restricted or habitat-restoration areas. Finally, I support the implementation of reasonable permits or fees, especially for professional dog walkers, if that is what is necessary to maintain voice-control dog walking access to the parks.

Sincerely,

Robin Gold

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|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 212 | Project: 11759 | Document: 38106 |
| Received: | Jan,20,2011 12:16:51 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Having lived in San Francisco, visited the areas covered and having been a dog owner in some of those years and now recognizing the need to protect the environment of the parks, I clearly see the need for control of park land for future generations. I support the uniform adoption of Plan D, leash control for individual dog owners and no use for commercial dog walkers. Individuals must take responsibility for their dogs and the message must be clear, enforceable and respected. I did not read any mention of enclosed dog parks, but I do know that these are used in Sacramento and have served pets and people very well. Perhaps pet owners could organize to explore | | |

possibilities for having enclosed dog parks. For opportunities to enjoy the natural beauty of these areas with native plants, and creatures, young families, seniors and handicapped persons need safe access. Dogs on leash make it possible for pet owners to enjoy the same privileges. Golden Gate Recreation and the National Park Service needs to protect and plan for the benefit and safety of all users. Thank you for doing that job.

Correspondence ID: 213 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 12:32:35

Correspondence Type: Web Form

Correspondence: I support the balanced approach to dog management, and am completely opposed to Alternative B, which would require that all dogs remain on leash at all times. Our dog has been going to Fort Funston with his dog-walking group for almost 12 years, and this experience has kept him healthy (at age 13) and well-socialized.

Correspondence ID: 214 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 00:00:00

Correspondence Type: Web Form

Correspondence: To whom it may concern: this draft is a complete load of garbage. You want to say it's about nature and the environment but, it's not. It's about uptight conservationists who don't like dogs. 99% of the parkland in this country is not dog friendly. The same goes for San Francisco. Don't try and tell us that the environmental problems at Fort Funston are a result of dogs and not the result of active bombs buried in the ground, military war construction or that giant pipe that's pumping sewage into the ocean. Please.

People who don't like dogs, which is what this is about, are free to go wherever they want in this city. You want to chastise dog lovers, and owners like myself, my wife and my friends by saying "hey, every other national park doesn't allow dogs so be grateful for what you have?" Well first, as someone who has an annual parks pass and has been to every National Park in this country, let me say, screw you! I love our parks and I hope to keep them pristine. Part of that love is a love for animals. I have adopted two dogs from the San Francisco SPCA. As someone who takes it upon myself to remove some of the burden of unwanted animals off of the city taxpayers, I would like to have somewhere to take those dogs and let them run around. Further, no other city in the country is as effected by the title "National Park" than San Francisco. You're basically saying that the majority of this city's parkland is subject to the same stringent rules and regulations as an isolated place like Denali or Death Valley. Again, give me,

give us, a break!

Do you know how many of the rescued and rehabilitated dogs from Michael Vick's dogfighting ring are in this city? Many of them. Shouldn't they have a place to go?

My family and I live in this city for a lot of reasons but, one of them is the dog friendliness. I honestly have to say that I will reconsider living here should this pass. This is solely about whining special interest groups and dog-hating morons who want the world to revolve around their inability to handle variety in the city.

I'm sorely disappointed and disgusted in this place and in the parks departments ridiculous agenda. I hope that this will not pass.

Sincerely,

Justin Jennings San Francisco Resident Dog Lover Dog Owner

Correspondence ID: 215 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 12:41:17

Correspondence Type: Web Form

Correspondence: San Francisco has always been one of the most dog-friendly cities in the country. And having established dog-friendly policies, behaviors and customs, it is no surprise that many people living in this city have dogs. We have chosen to have dogs not only because it is our right in our pursuit to happiness, but because we live in a city that is, and has always been friendly and accommodating to dogs. We are committed to San Francisco and to our dogs and consider them members of our families.

That being said, having and caring for a dog in a city where most people do not have yards and live in small apartments is hard and very big commitment. It is a labor of love and sacrifice much of the time. It has been established and accepted for years that dogs are allowed at the currently designated state parks in the city. Essentially, this is the backyard that we all share. Taking dog areas and off the leash areas away now is like saying private boats are no longer allowed in the bay because a few of them are leaking oil and running into seals. Yes, those things are bad, but they are not the majority of boats who enjoy the bay everyday. People have chosen this city and built their lives around the values and choices in lifestyle it believes in and upholds. Taking the parks away from dog owners and dogs is essentially putting almost every dog in the city in a kennel.

I do acknowledge and agree that there are people that abuse the GGNP's dog

friendly policies. Namely, the "professional dog walkers" that bring 7-10 dogs to the park at a time in their small trucks several times a day. There is no way that one person can control that many dogs off the leash or even on sometimes. It is also these dog walkers that do not pick up their dogs waste. I have told many dog walkers that one of their dogs has defecated here or there, and most always they say they "did not see it" some just flat out ignore me. This is really unacceptable because is their JOB to see it and pick it up. It is what they are getting PAID to do. If they can't see that one of their dogs has defecated, even once, then they have too many dogs with them. There are also regular people who feel entitled to leave their dogs feces on the ground. These are the people that are ruining the enjoyment of the park for others including other dog owners. The majority of the people that use these parks and bring their dogs here, love these parks and keep these parks clean. I see dog owners that go along picking up other peoples trash along the beach as they walk their dogs!

I agree these problematic dog issues need to be stopped, but I propose that instead of banning all dogs or leashing dogs in parks, under the guise of an "environmental issue", when dogs have been allowed in these parks for years, we deal with the real problem of the bad dog owners and professional dog walkers.

Nobody (even those of us that have and love dogs)wants dogs at the park that are out of control, dig huge holes in the sand, defecate and have it not picked up, or run into others and disturb others right to enjoy the parks. These "bad" dogs are the product of and the responsibility of bad owners. These dog owners are the ones that should be punished. They give everyone else that treats these parks with respect and like their own back yard a bad rap. It's completely unfair and unjust to take away the rights of all because of a few who abuse their rights.

If the city imposed a maximum dog per person rule in parks and a very strict and expensive fine for not cleaning up dog waste, I believe this would change many of the issues that led to this proposed plan. Let's ticket someone \$100 for not picking up their dogs waste. Let's ticket them \$500 for a second offense. Let's ticket dog walkers \$1000 for bringing more than 3 dogs to the parks. Let's ticket dogs that are not licensed with the city.

For example, if the city imposed a fine of \$500 for leaving dog feces on the ground in a national park, a ranger could probably give out 50 tickets a day. That's \$25,000 A DAY. More than enough to cover the salary of someone appointed to oversee and fine bad dog owners.

I am fine with all these tickets because I am not going to get a ticket. I don't do these things, nor does the majority of San Francisco dog owners. Charge huge fines for bad owners because the majority of us think of these parks as

our backyards too and we grew up in them, we take our families to them (including our dogs) and we keep them the way we keep our homes. We respect the rights of others and keep our children and dogs under control. We respect the environment and other peoples right to enjoy the park and to walk around without looking at or stepping in dog feces. No one likes it. In fact we are the people that come with extra poop bags from home to restock the baggie areas.

We all know that the streets in San Francisco are crowded with cars and pedestrians and bikers. And we all know there are bad drivers on the streets. These bad drivers are dangerous and disrespectful to pedestrians as well as other drivers. What happens is that these drivers get tickets and punished AND the city makes money from these fines. We don't stop everyone else from driving around because some bad drivers hit pedestrians, pollute the air with bad exhaust, damage city property, double park during rush hour or hit other peoples cars and leave the scene.

This pendulum approach to problems is not working. We don't need to go from one extreme to the opposite fix issues at hand. This mentality has not fixed things in the past and it will not fix the current problems in the parks. Many people in the city have dogs. Wealthy people, poor people and even homeless people. Dogs have always been part of this city. Dogs need a place to run and play and interact. Taking away the parks or leashing dogs is not a solution, because it creates a new problem, dogs caged up in small apartments, on city streets or confined to small areas of city parks where the sod quickly become muddy and disgusting due to overcrowding too many dogs in too small an area.

Lastly, people who understand dogs, know many leashed dogs act completely different off leash. Leashes are not natural for dogs and create an environment in which a dog may feel threatened because they are restrained and cannot behave like dogs instinctively do with each other. The best thing someone can do if a dog is becoming aggressive with another dog while on the leash is drop the leash. This changes the entire dynamic and does not result in a dog fight, it results in a "conversation" between the dogs and everyone can then go on their way. Off the leash, dogs can interact, socialize, exercise in a natural way.

I understand and support dogs being leashed on the streets and public places for the safety of everyone including the dogs. However, I have been to Chrissy Field at least three times a week for many years and I have never witnessed a dog fight between dogs off the leash. On the contrary, I have seen dogs on leashes lunging and growling at each other walking down the streets as they pass one another everyday. Mandatory dog leashing at dog parks is not an alternative "solution" to the problem. In fact it creates more tension, more potential for aggressive behavior and deters from the

enjoyment of both dog and owner.

The solution is to target the people creating the issues such as the dog owners and walkers with too many dogs, not picking up dog waste and not training or bothering to keep their dogs under control. All people, including dog owners, would enjoy the parks more if these people were eliminated. And like traffic fines, it could even become a revenue stream for the city.

Correspondence ID: 216 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 15:12:49
Correspondence Type: Web Form
Correspondence: My wife and I support Alternative A. We've been visiting the Crissy Field east beach for many years, and find it to be one of the most spectacular urban recreation areas in the world. It's notable--and representative of San Francisco's unique character--for the diversity of its visitors and of their activities, from runners and dog walkers to kite surfers and even the occasional swimmer. The sight of dogs cavorting happily there adds substantially to this area's wonderful appeal. We've never encountered any sort of problem involving the dogs, and we urge that current practices in this regard be continued. It's not broken; we need not fix it.

Correspondence ID: 217 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 00:00:00
Correspondence Type: Web Form
Correspondence: As a dog owner, I am for a plan that clarifies where dogs are allowed, but ensuring there are places in a city--whose identity is in part to be a dog-friendly city-- where our dogs can play off-leash and be dogs. My two dogs absolutely love Crissy Field and whenever we bring them down we usually bring our baby with us too: it's a complete family outing. There is no other place north of SOMA where one can do that. In addition, why are there no hiking trails in the headlands where dogs are allowed to be off-leash?

Correspondence ID: 218 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 15:59:31
Correspondence Type: Web Form
Correspondence: As a San Francisco native and dog lover and dog owner (temporarily residing in Washington but in SF half-time) I'd like to comment on the latest plan.

In my view, the problem which requires regulation is not dogs, but dog

owners who are blind to the consequences of their failure to control their pets.

Were these animals truly under voice control, and accompanied by a caretaker who was actually taking care, there would be no need for regulation.

Unfortunately this is not the case. While one frequently hears "He won't bite," what the dog's custodian is right about is that their dog won't bite THEM. And, when a bite isn't the issue, having a dog thrust their muzzle into your crotch, or jump up, or knock down an infant (all of which I have experienced from dogs required to be under voice control) their assurances to the contrary, then government is called upon to remedy the absence of common sense on the part of the dog owner.

Fact: dogs are animals that don't always perform as expected.

Fact: dog owners are inordinately forgiving of their own transgressions of both the law and safety and freedom from canine harassment.

Fact: dogs are guiltless in this regard, since they cannot correlate expectation and appropriate behavior (one of the reasons they are so loved, but not by all).

Fact: If a human did what dogs frequently do in off-leash areas (and all too often in leash law areas where the owner thinks the laws don't apply to them) that human would be subject to arrest and prosecution.

Why, then, should we accept behavior in dogs that is inappropriate for all, in public spaces? The answer is that if we had a proficiency among dog owners as one finds in Europe, where animal custodians take their responsibility (to both dog and fellow human) much more seriously and conflict between dogs and between humans and dogs is virtually unheard of, regulation would not be needed and all could play in peace.

Since dog owner myopia is so frequent, the regulations proposed are minimal when public safety, recreation, and enjoyment of these resources are considered. These resources are meant to be SHARED, not ceded to the self interest of some. Since humans would not be tolerated who behaved as many off leash dogs do, dogs should, if need be (and need is) leashed.

But please don't blame the dogs. They're guiltless. It is the dog owner, careless when they should be careful that necessitates regulation and I admire the responsiveness of the G.G.N.R.A. to protect the recreational importance of these resources for ALL, not merely the loudest.

Correspondence ID: 219 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 16:04:19

Correspondence Type: Web Form

Correspondence: Regardless of decisions made, people will continue to allow their dogs to run off-leash in the less populated areas of the GGNRA. My concern is that when a mountain lion or coyote attacks somebody's dog that the wild animal will be seen as a nuisance and killed. (I've already watched coyotes stalk leashed dogs, so this is just a matter of time.) I'd like to see some sort of safeguard in place for the animals that belong in the parks rather than for those that only visit. Maybe posting warning signs. I don't want to see more signs, but some people don't believe that their dogs are seen as trespassers or moving snacks to local fauna. My main hope is that when somebody complains that Spot found one cat that it shouldn't have chased that the park sends flowers to the dog owner rather than a firing squad for the mountain lion.

Correspondence ID: 220 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 16:42:30

Correspondence Type: Web Form

Correspondence: My main experience is with Chrissy Field, where my wife and I often walk our 15 lb poodle mix under voice control. The majority of people with whom we interact come away with a positive experience from our dog, and we have never had a bad experience interacting with other dogs in the area.

From Appendix G, I see that there was only one report taken for dog bite/attack in Chrissy Field in all of 2008 (with no citations and no warnings). The only remaining reports from 2008 are all leash citations/warnings/reports (with the exception of one pet rescue), which leads me to believe that the Police are OVER-patrolling the area, if anything.

I certainly don't understand how these seemingly benign conditions could warrant a change in existing laws to a more restrictive leash environment. There were no complaints, so I don't understand the motivation behind a change in the Chrissy Field regulations.

If it is asserted that environmental considerations are the driving factor in a regulatory change at Chrissy Field, I would ask to see evidence that leash laws decrease the environmental impact of pets. My own experience is that negligent owners will allow their animals to harm the area through digging or through uncollected feces regardless of whether the animal is on a leash

or not.

You can count myself and my wife as generally opposed to any change in leash law regulations in and around San Francisco, and specifically opposed to a change at Chrissy Field.

Correspondence ID: 221 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 17:04:43

Correspondence Type: Web Form

Correspondence: I strongly oppose creating any restricted areas for dogs at either Chrissy Field or Fort Funston. As a dog owner, those areas are vital (and rare) spaces where my dog is free to interact with the environment. A contained space is simply not the same for a dog, or a dog owner. It would also significantly hinder my use and enjoyment of the space. In fact, although I am a frequent visitor to both parks now, I would be unlikely to go at all if the only option was a penned in space. We need places in the city that are free spaces for dogs and taking away those limited spaces is just unacceptable.

Correspondence ID: 222 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 17:25:21

Correspondence Type: Web Form

Correspondence: Running with our dog Rubicon freely on Crissy Field's East Beach is not only a true pleasure and joy, but critical to maintaining her physical and emotional well-being (as well as our own!).

By allowing Rubi to be off leash, she can get considerably more exercise than when tethered to her slower human counterparts. She is also able to socialize with other dogs of all ages and sizes easily. This also is good for her fitness and mental health. Leashes severely encumber the ability of dogs to intermingle as they get tangled, often around people legs, threatening injury to the dogs and their owners. The limitations that leashes impose will discourage the activity and socialization of dogs and our entire community, not just the dogs and their owners, will be worse off.

Off leash allowance encourages proper training and socialization of dogs. It affords greater physical and emotional health of dogs and their owners. And it therefore contributes to a better overall society.

Please support the happiness and health of our community by allowing dogs to be off leash.

Sincerely, Eliza Lochner

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| Correspondence ID: | 223 | Project: 11759 | Document: 38106 |
| Received: | Jan,20,2011 17:34:06 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | It is very important that my dog be able to have space to run. There are already too many parks that don't allow dogs to be off leash. Let us keep the ones we have. | | |

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| Correspondence ID: | 224 | Project: 11759 | Document: 38106 |
| Received: | Jan,20,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I've lived in Muir Beach for 35 years and raised numerous dogs as well as children here. Removing the dogs from this community or those that come from afar from the beach would be an end of a wonderful tradition that allows dogs the freedom to exercise and play as well as to interact with other dogs and people on the beach. If they became wild packs of dogs attacking this environment I would feel differently, but as I write I watch dogs playing on the beach harming no one. | | |

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| Correspondence ID: | 225 | Project: 11759 | Document: 38106 |
| Received: | Jan,20,2011 18:05:26 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | We are longstanding San Francisco residents with a dog in our family. Like most residents in the City of San Francisco, we do not have a lawn or yard. Our only chance to provide our dog with the exercise and activity he needs is to take him to places like Chrissy Field, where he can run off leash, play fetch and socialize with other dogs. In fact, one of our dog's favorite activities is to visit the beach at Chrissy Field, play fetch and go swimming to retrieve his ball. He can't wait to get out on the sand and in the water when we bring him down there. It is also one of our favorite activities. We are extremely responsible dog owners, as are the other dog owners down at Chrissy Field. We respect other visitors, always pick up after our dog and ensure that he does not bother anyone. We have never encountered any negative responses or feedback from other non-dog owners visiting the area. In fact, just the opposite. Most people's faces light up when they see our cute, happy, friendly black lab running along the beach. We are also very aware of how lucky we are to have a place like Chrissy Field to take our dog. Therefore, we pay particular attention to respecting the area, the environment and respecting other visitors. | | |

We are also fairly new dog owners, having just added our black lab to the family in May of 2010. That said, we have both lived in San Francisco for over 15 years and were frequent and regular users of the Chrissy Field and the Presidio long before having a dog. We even lived in the Presidio for 3 years. Neither of us ever encountered any problems with dogs during our years of usage and, in fact, always found the dogs and their owners to be extremely respectful. Not only that, but the presence of dogs and their games and happiness adds an element that would be sorely missing if dogs weren't allowed or were severely restricted in their areas of use and play.

Dogs make people happy. Dogs and people have happily coexisted at Chrissy Field for decades. Taking away this idyllic place for dogs and their owners harms everyone and the community at large. It means the world to us to be able to bring our beloved Bruno down to the beach and see the joy in his face. The city and Chrissy Field would not be the same if adopted the proposed policies. Please leave Chrissy Field as it is.

Thank you,

Darcy Manning, San Francisco Resident since 1994 Mother to Bruno
Manning 10 month old Black Lab

Correspondence ID: 226 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 18:10:22
Correspondence Type: Web Form
Correspondence: Please do not take away the pleasure of Fort Funston and Chrissy Field for our dogs. My dog Odie goes with his beloved dog walker to Funston every weekday, and most weekends my husband and I take long hikes there with him. It is his second home. There is nowhere else in the world he is allowed to run free with his dog friends, and being able to do so has been crucial to socializing him. I believe that if it were not for Funston, he would not be as happy and well-socialized as he is today. Some of my most treasured memories involve taking Odie to Funston on a gorgeous weekend and walking alongside the ocean throwing a stick. It's the simple things. Please don't take that away from us.

Correspondence ID: 227 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 18:29:10
Correspondence Type: Web Form
Correspondence: I would like to support restricting dogs in GGNRA and make sure that they are on the leash ALWAYS. I work as an outdoor educator in GGNRA and I

have encountered many dog incidents in the park while I was with my students. For example, a dog peed on my students backpack and a dog ran up to my student and took sandwich out of her hand. I have also seen dog chasing wildlife and disturbing its habitat. One time a buck deer died as he was running away from the dog in the lagoon. I think it will be solved if we can make a rule to put dogs on the leash just like we used to have it as a rule here in Marin Headlands.

I like dogs but we can never be sure that all dog owners are responsible dog owners. I think it is reasonable to make this rule.

Correspondence ID: 228 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 18:30:16

Correspondence Type: Web Form

Correspondence: Even though my dog is small - she needs to run a great deal. Fort Funston is one of her favorite places to go as it is the only park where she is not scared of the other dogs and that is not full of mud or mosquitoes in the winter. She cannot get the exercise she needs on leash. Fort Funston and the other parks are already packed full of dogs - restricting the size of off leash play would make it dangerous for small dogs and people protecting them as they would be confined in the same areas that aggressive large dogs also are playing. Thank you,

Correspondence ID: 229 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 18:54:29

Correspondence Type: Web Form

Correspondence: PLEASE do not approve this plan!

San Francisco is a dog-friendly city, considering its relatively small size and high population density. It is hard enough to have a dog in any city, but this new policy will make it VERY difficult on our local dogs, who need fresh air an exercise just like we do. There is very little privately-owned green space in the city. Our parks and our beaches are our yards.

The vast majority of dog owners are respectful, law-abiding citizens who clean up after their pets and follow the rules. Please don't punish these people and their dogs by implementing a plan like this, which is directed at those who are disrespectful and irresponsible.

Lastly, you might be surprised to note that there are more dogs in San Francisco than there are young children. Please keep this in mind before you

pass this bill.

Thank you, Marshall Smith

Correspondence ID: 230 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 19:55:34
Correspondence Type: Web Form
Correspondence: As a resident of San Francisco, I am extremely concerned to read about the proposed additional restrictions limiting off-leash dogs to small areas in Fort Funston and other recreational areas. For almost all of my friends and neighbors in Noe Valley, the current regulations allowing dogs on voice command at Fort Funston is one of the few reasons we are able to still live in the city. There is extremely limited space to allow "dogs to be dogs" and run extensively throughout the city. Fort Funston is one of those few gems that allow dog owners to ensure their dogs get the type of exercise they need. Some may argue that a smaller space for off-leash dogs would be a better solution - but they are wrong. With the number of dogs that use fort funston on a daily basis (as part of the economic infrastructure of the dog-walking community), a space the size of a football field will simply not work.

Please reconsider the changes to the off-leash policy and at least allow Fort Funston as this area in the city for the thousands of dog-owners and their dogs who enjoy it ever day and on the weekends.

Correspondence ID: 231 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 19:56:36
Correspondence Type: Web Form
Correspondence: Please do not take away or reduce off-leash areas in the city. As a dog owner and resident of San Francisco, I truly value these spaces and cannot imagine where we would go to allow our dog to exercise and run freely. Fort Funston and Crissy Field are two of the best locations for our dog, Frankie, to be able to get the exercise he needs while socializing with other dogs. Responsible dog owners like us deserve to continue to use this space without further limitation.

Correspondence ID: 232 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 20:29:21
Correspondence Type: Web Form
Correspondence: I have a yellow lab. Having an off leash park such as Fort Funston and

Chrissy Field was crucial to me adopting this dog from the SPCA. I knew he needed lots of exercise - which he can't get on leash. Please keep these parks off leash dog friendly. Dogs need it.

Correspondence ID: 233 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 21:30:31
Correspondence Type: Web Form
Correspondence: As a responsible dog owner, I feel that that dog management plan draft is far too limiting for the large number of us responsible dog owners. Looking at the map with the proposed dog areas at Crissy Field, half the main areas where dogs have the most fun will be off limits. While I do feel off leash dogs must be under strict control by their owners, cutting the few areas where dogs can RUN, is a terrible direction for the GGNRA to take.

Yours truly,

Alice E. Trepp

Correspondence ID: 234 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 21:35:18
Correspondence Type: Web Form
Correspondence: My 70 pound dog and I live in San Francisco. Both Ft Funston and Crissy Field play a large part in his regular off leash exercise (I take him to Ft Funston on a regular basis and my dog walker uses Crissy Field). I rescued my dog 15 years ago off the street when he was only 3 months old. The dog friendly nature of San Francisco played a large part in my decision to keep him, knowing he was going to be a big boy and would need off leash exercise on a regular basis. Please consider the large population of dogs in the city that use these parks and need to run around off leash after a long day of waiting for their guardians to come home. Thank you! Hannah and Moon

Correspondence ID: 235 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 22:04:45
Correspondence Type: Web Form
Correspondence: I have raised, trained and handled dogs all my life. I don't currently own a dog, but go to Ft. Funston on a daily basis to be around dogs and hike. Since I "don't have a dog in this fight", I believe I am objective and can provide some insight. As a canine enthusiast, I still respect the fact that not everybody wants to be around dogs. I also realize that very few owners (or dog walkers for that matter!) actually have voice control of their dogs. I

think the limit of 6 dogs for walkers is appropriate. Regarding the "Preferred proposal": It seems workable and reasonable. The only flaw I see is that the "no dog area" North of the access trail is often inaccessible at high tide, due to a outcrop of rock from the cliff. I don't think this is fair to people who don't want to be around roaming dogs. I would keep the "no dog area", but make the beach (to the South) between the access trail and the sewer outlet pipe an on leash area. The beach from the pipe to the sand ladder trail could ROLA. This would provide a landmark (the pipe) to define the two areas. It would also allow dogs to access the "voice control" area from the North or South. I think it provides plenty of beach for ROL. Regarding Crissy Field; I don't think it is workable to have ROLA at the water line. I think sections of beach have to be designated as I proposed for Ft. Funston.

Correspondence ID: 236 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 22:32:15

Correspondence Type: Web Form

Correspondence: The new plan will more densely pack areas increasing the already horrific danger for small dogs. PLEASE like other places in the bay area and thruout the country, PLEASE PLEASE PLEASE, reserve some off leash spaces for SMALL dogs only and have them enclosed. There is no such area in san francisco. We desperately need them. New york has them, South peninsula has them, many places have them. why not san francisco? The danger to small dogs of predatory drift from larger dogs is real. All that needs to happen is that a bee can sting a small dog or a dog can get is foot caught, and if he runs yelping or bleeds, the primitive brain of the larger dog regresses and thinks "rabbit' attacks, the other dogs join in and the little one is finished. IT is horrible. It has nothing to do with good dog or bad dog, it can happen with dogs who have played together for years. IF you guys are going to increase this danger by packing more dogs into fewer spaces, you have the moral obligation to set aside some enclosed areas for SMALL DOGS ONLY. Thank you for your consideration. Why is san francisco so very dark ages on this issue. no enclosures for small dogs only in any park anywhere. plenty of other localities have them, why not us?

Correspondence ID: 237 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 22:46:17

Correspondence Type: Web Form

Correspondence: I appreciate the hard, and thoughtful work that went into this document. I am a dog owner myself, and know how others love their dogs. In the interests not only of today's environment, but that of our children, however, I wholeheartedly support, without exception, your alternate D.

We are preserving these parks and this parkland for ourselves and our children, not for ourselves and our dogs, not for our children and their dogs. We don't choose to be born. We choose to have a dog. With that choice comes some responsibilities, the least of which is obeying the law.

I volunteer for the Park Stewardship program when I can, I spend part of almost every weekend hiking/bird+bugwatching through the parks. I love them for what they are, the wonders of the juncus plant pressing through wetlands, or the black shouldered kite hovering above some hill are sights that I want to preserve for my unborn grandchildren. The pressure of dogs on the environment make this much less likely to occur.

If dog owners were courteous, if they obeyed the on-leash signs, if they obeyed the no dog signs, then I would reconsider. But almost every time I have gone out hiking, I have found a dog off leash where it shouldn't be. Or more than one. On the Bobcat Trail. In the Crissy Field Marsh. In Kirby Cove. Tennessee Valley Beach. Lobos Creek. Off leash on Milagra Ridge. You name it, I've seen it. Just as often as not, these are big dogs! Their owners, on the few times I have pointed out that their dogs are NOT supposed to be here, or at the very least, supposed to be on leash, act as if I am violating a god-given right to own a dog, and then to permit this animal to run free, "in nature." While it's nature that it's plundering, as it disturbs a plover's nest, destroys one of the few non-argentinian ant nests still around, or digs up a ceanothus in chase of some burrowing creature, thus permitting pampas grass to take over its recent excavation (this last I cannot claim to have seen fully, but over the course of years, have suspected it!)

In short, my vote is no dogs. A natural park is a privilege that we have maintained for humans, a natural park contains certain fragile environments. The dogowners that I have seen are willing to "let it go to the dogs." As a large population of dog owners - in fact, I would say the majority of dog owners I have encountered in my 25 years walking the parks break the rules, then they should not be permitted into the parks with their dogs. I realize that this will not satisfy a sizable population who do obey the rules, and who do want to give their dog an outing where there are wonderful smells to be had. And I also realize that they are not responsible for the aforesaid scofflaws. I am sorry for them and their dogs. But this doesn't change my decision. It is a pity that their access must be reduced, but in my view, it must. I hope that you will choose option D, and that you will have the resources to enforce it.

Respectfully submitted,

Owen Brown

Correspondence ID: 238 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 22:52:35

Correspondence Type: Web Form

Correspondence: I value California native species and habitats. I do not feel that dog walkers have the right to let their dogs run uncontrolled in these areas.

Voice control is NOT control. Enclosed areas would be acceptable for off-leash dog running.

I value children and people who are either disabled or fearful of uncontrolled dogs. That is another reason dogs need to be leashed.

Perhaps some owners clean up after their dogs. Unfortunately, a lot do not; and because of those unconscious people we have to deal with contamination in scenic areas. Another reason to keep dogs on leash.

Personally, I am tired of the strident demands of the dog owners and walkers. They are but one small but too vocal group.

For all the reasons above, I completely support the GGNRA Draft Dog Management Plan.

Sincerely,

James Zimmerman

Correspondence ID: 239 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 23:49:27

Correspondence Type: Web Form

Correspondence: I am writing in response to the GGNRA Draft Dog Management Plan / Environmental Impact Statement. I own and operate a dog walking service serving clients in Southern Marin, and have done so since 2006. I frequent many of the areas in the draft, including the Homestead Valley fire road, Oakwood Valley Trail, Coastal Trail in the Marin Headlands, and Rodeo Beach South. I have completed the Trail manners class at the Marin Humane Society and am a Certified Dog Walker through DogTec. In addition, I have been working professionally with dogs and the public since 1997. Professional dog walkers provide a valuable service for Marin dog owners. Regular exercise provides a positive outlet for their pet's energy, reducing behavior issues that cause dogs to be surrendered to animal shelters, and nuisance behaviors such as barking. Dog walking companies also create jobs within Marin County. GGNRA trails are one of the few

areas in which we are permitted to walk dogs off leash (under voice control). On leash walks do not allow dogs the freedom to run and effectively burn excess energy. For the majority of our clients, an off leash walk does not meet the exercise needs they have for their dog(s). Our company policy on walking dogs on public land allows our client dogs to run and play while having the least amount of impact on trails and other GGNRA patrons. We limit our groups to 5 dogs maximum, carry leashes for all the dogs, and clean up and remove dog waste on the trail. We call our dogs over and leash them when we see anyone approaching, though the most wonderful part about GGNRA trails is that we rarely see anyone. We keep our dogs on trails where dogs under voice control are permitted, and do not allow the dogs to damage vegetation, chase wildlife, or run off the trails. Prior to participation in group walks, we screen dogs for appropriate behavior and voice control. This includes an in-home interview with the owner and dog, and several weeks of on-leash walks to evaluate behavior. This allows us only accept non-aggressive dogs that respond well to voice commands. If there is no avenue for walkers to be responsible and legally walk dogs off leash, that increases the likelihood of dog walkers using GGNRA areas illegally. Walkers who violate on-leash regulations are also more likely to ignore common courtesy guidelines such as cleaning up after their dogs and keeping dogs under voice control. Being able to walk dogs at GGNRA is a wonderful privilege that I do not want to lose. I urge the National Park Service to consider keeping the current voice control areas open and available to both commercial and recreational dog walkers. The majority of dog walkers I see in GGNRA are responsible in their use of the trails with their dogs. I would encourage better enforcement of rules for dog owners not following protocols, including issuing citations where necessary. Thank you for the opportunity to provide feedback on the GGNRA Draft Dog Management Plan / Environmental Impact Statement, it is much appreciated.

Jessica Bay Urban Escapes www.UrbanDogEscapes.com

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| Correspondence ID: | 240 | Project: 11759 | Document: 38106 |
| Received: | Jan,21,2011 02:03:35 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | As a dog owner and tax payer of this city, I am perplexed. Our off-leash dog space is already limited to a fraction of the Bay Area's open space. Why not try increasing fines for people who violate on-leash or no-dog laws already in place before the draconian move to make off-leash dog play more difficult than it already is? Why not move to limit the number of dogs a professional dog walker can take alone if unsupervised dogs are the issue? | | |

Bay Area dogs are as much a part of the environment as birds and flora. And

further, if not exercised correctly, which means sufficient off-leash running, even the sweetest of dogs becomes noticeably more irritable and aggressive. These dogs then become more than ever a danger to each other and to people as well, in the urban settings we share. If dogs cannot exercise, you put them, their owners, their owners' families, and their neighbors at risk.

Further, social and scientific studies show the benefit of dog ownership to humans: the companionship, the bond, the exercise both dog and owner get outside, in the sunshine- no one can deny these are healthy both mentally and physically. Of all animals in the environment, dogs are the creatures who have evolved to serve and live for humans. Why do we not do all we can to protect them? They should be granted everything they need to be healthy and happy, for they make their human counter-parts the same.

We must compromise on this issue. Increase as much as you need to the fines for off-leash violations, for not cleaning up after dogs. Consider dog walker-licensing and regulation. Try these less punitive measures first, before taking steps that in the end actually punish even those who claim to hate and fear dogs. Because one of the worst thing you can do to a dog's disposition is to prohibit the animal's instinctive, very real, need to run and play.

Finally, we are tax payers and supporters of the very parks we wish to use. We are also dog owners. We are hard pressed to see how our needs are not important in this study's focus. We trust with consideration, this proposal can be made more fair.

Correspondence ID: 241 **Project:** 11759 **Document:** 38106
Received: Jan,21,2011 10:14:21
Correspondence Type: Web Form
Correspondence: I am sorry to read this proposal which even further limits places for dog owners to allow their dogs any off leash activity. I agree that in sensitive habitat areas, or at certain times of the year, breeding or nesting seasons for example, it may be necessary to restrict access or enforce use of leashes. The recreation areas we have should be available for those of us who enjoy them with our pets, as well as those without dogs.

Correspondence ID: 242 **Project:** 11759 **Document:** 38106
Received: Jan,21,2011 10:29:52
Correspondence Type: Web Form
Correspondence: Dear Parks Service,

I am greatly disturbed by the thought of many of San Francisco's beaches becoming inaccessible for off-leash activities. Dogs, just like people, need exercise to stay healthy and happy. Leash walking in a confined area is a bit like putting a dog on a gerbil wheel- not really exercise and certainly not fun for anyone.

Dogs are a wonderful counterbalance to the stresses of city life. Being able to roam freely with them on Chrissy Field, Ocean Beach, and Fort Funston is invaluable, since most of the city's parks and trails, and of course all the state parks, are closed to dogs entirely. In a time when our society is struggling with the issues of obesity, environmental destruction, and social alienation, the ability to play with your dog on these beaches encourages personal exercise, new friendships, and a raised awareness of the necessity of environmental stewardship.

I urge you to adopt Option A, a continuation of the current status of these parks and beaches, so that all of us living in this beautiful city can continue to enjoy health and happiness with our dogs.

Correspondence ID: 243 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 10:34:02

Correspondence Type: Web Form

Correspondence: Hi, I stable a horse at Miwok Livery...ride trails on a daily basis. When riding the trails especially at a trot or canter it is totally unnerving to confront a dog off leach. There is no way to anticipate what the horse or dog will do....most dog owners feel their pet will not be aggressive toward the large horse...they have no idea how my horse will react or what will happen to me being in the saddle 5 feet off the ground! I realize the trails must be shared however it should be mandotary to have all dogs on leach on ALL Trails I contribute annually to the GGRA and appreciate the ongoing work that that has taken place over the past 5 years. Thanks Dennis Fluet

Correspondence ID: 244 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 10:50:42

Correspondence Type: Web Form

Correspondence: I feel all dogs need to be on leash in all public parks, except in designated fenced areas. I do not wish to encounter dogs anywhere in parks, possibly excepting on leash with owners required to pick up their leavings.

NO DOGS!

Thanks very much.

Correspondence ID: 245 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 11:59:09

Correspondence Type: Web Form

Correspondence: I know you'll get a lot of mail from the pro-dog community. I've reviewed your alternatives, and hope the options selected work out. I just wanted to let you know there are also members of the community that are anti-dog, of which I am one. The experience at the park is compromised when dogs are present.

Best of luck.

Correspondence ID: 246 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 12:09:35

Correspondence Type: Web Form

Correspondence: To Whom It May Concern,

I am very disappointed in our city, as a collective community, at the thought that we would further limit our commitment to our animal family members. I grew up in Marin and am now a home owner and small business owner in SF. I have three dogs, rescues, that I have adopted. Given my busy work life, my time with my dogs at Crissy field is very meaningful. I often equate it to church. As a bike rider and avid runner, I have trained my dogs where to walk and to come when called in the event that they are anywhere near an oncoming runner or biker. Although it would be hard to detail the degree of pure bliss my dogs feel when at Crissy field I can, with no hesitation, share the pure joy that my dogs bring to those at Crissy field when we go. Some days its hard to get the entire walk in as people are so taken with my dogs and they love to watch, pet, interact..with them and at times Ive thought to have a print out of answers to the questions people love to ask me about them. My dogs do not go into protective areas, I clean after them with great care and I have never seen an orphaned dog mess. This city is about its dogs and we need to pay careful to the decisions we make to limit our communities ability to interact with them. Such a considered measure does not represent us as city. I urge you to please consider this very carefully.

Correspondence ID: 247 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 12:09:44

Correspondence Type: Web Form

Correspondence: The proposed limits on dog offleash areas at Fort Funston and Crissy Field would be extremely detrimental to dogs and their owners. I have a boxer who needs to be given large open spaces for exercise and play. She is taken by a dog walker to Fort Funston while I take her to Crissy Field. There is even a boxer meet-up once a Month at Crissy Field.

By limiting these areas to off leash, would only crowd exercise areas making the whole exercise plan an impossibility. Dogs would only get in each others path causing potential harm to all dogs.

DO NOT MAKE THE PROPOSED OFF LESH AREAS AT FORT FUNSTON AND CRISSY FIELD LIMITED IN SPACE IN ANY WAY. DOG OWNERS IN SAN FRANCISCO AND THEIR DIGS NEED MUCH BETTER THAN WHAT IS BEING PROPOSED.

Correspondence ID: 248 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 12:31:17

Correspondence Type: Web Form

Correspondence: From my perspective, the bottom line is options. People who do not prefer dogs have MANY more options of where they can enjoy activities without dogs. Living in an urban environment, I think we have to protect access to areas that historically have been open to dogs to get maximum exercise off-leash. Dogs that do not get enough exercise can cause even more disruption to people who do not prefer dogs by way of barking & being a general nuisance when they are frustrated from lack of activity.

RE: environmental concerns, as I read the document the general impact seems to be low to moderate. Can't a buffer be created in those areas instead of limiting/eliminating access all together to those areas. Most people try to be very respectful if it is clearly communicated why there is a need for protection to endangered wildlife/ecosystems. People that utilize the areas with dog access have a vested interest in protecting that access. Better communication and asking users to call on their fellow users to respect the rules (access, clean up, etc.) so as not to jeopardize use for everyone.

Bottom line it seems that the biggest concern is for people who do not prefer dogs and I think they should avoid those areas that they know there is a possibility that they might run into dogs (and that doesn't mean that people who let dogs off-leash shouldn't be responsible for their dogs being trained to obey voice commands to leave people alone and generally behave politely) and go to the MANY other places that they can enjoy the same activities where dogs are not allowed.

No way to avoid the fact that the SF Bay Area is not going to see any fewer

dogs in the future as our population continues to age, families have fewer children, and the high percentage of families that move out of the urban areas for more suburban room.

Correspondence ID: 249 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 12:51:21

Correspondence Type: Web Form

Correspondence: First, thank you for posting these documents--it allowed me to have a much greater sense of the scope of the issues and the immense difficulty involved in resolving them to the satisfaction of all the interested parties.

As a San Francisco resident since 1993 (and dog owner since 1998), I am very grateful to have so many beautiful areas to escape to for recreation and exercise with my dog. In that time I have mainly utilized Fort Funston, although I have also visited Crissy Field and Land's End/Sutro Heights Park on rare occasions. I am also aware, having had many conversations with park rangers over these years, that maintaining these areas is a difficult, expensive, and time-consuming process. So, coming up with alternatives that address the need for balance between environmental and recreational uses, and lays out the different possibilities in an easy-to-understand and-compare format, is very much appreciated.

After having read the five alternatives you have listed, I would like to state that, IMHO, alternative C seems the most feasible, flexible, and (sorry, but it's the best word I could think of) humane way to deal with the issues involved in managing the GGNRA and the diverse needs of its users. I recognize that it will be a headache to deal with each park on a case-by-case basis, as this alternative seems to dictate, but I believe that, once it has been done, it is the best way to manage the usage of the parks in a way that will satisfy the most people. (Of course, being a dog person, I'd love to vote for alternative E, but I recognize that it's not the most realistic way to protect the interests of all the park users, nor would it be financially realistic to expect the NPS to provide MORE money to maintain park resources considering the current financial situation in our country.)

At any rate, thank you again for posting this, and for allowing the public to have their say. Sincerely, HL Waterman

Correspondence ID: 250 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 13:01:15

Correspondence Type: Web Form

Correspondence: While I recognize the need to balance several factors, the proposed changes

to Crissy Field and Fort Funston are particularly objectionable in terms of the new on leash areas. These two parks are some of the last refuges in the Bay Area for dog owners have to experience the beauty of these parks, get some exercise, and allow dogs to run. I have never encountered problems with the cleanliness of the area even with free-range canines present, and all of the dog owners take great care to clean up after themselves.

Correspondence ID: 251 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 13:06:01

Correspondence Type: Web Form

Correspondence: By restricting the off-leash dog areas to such small portions of this outdoor space, when the legal places to have dogs off leash is already extremely restricted in San Francisco, you will just make those few places so incredibly crowded and they will no longer be enjoyable locations to visit. I sincerely hope that places like Crissy Field & Fort Funston will remain off leash dog walking areas for those of us who have dogs, and use the areas responsibly and enjoy them so much as they are now.

Correspondence ID: 252 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 14:50:49

Correspondence Type: Web Form

Correspondence: I frequently walk Chrissy Field and also the walk paralleling the Presidio Golf Course with my Cairn Terrier. At Chrissy I and my friend who also has an even smaller dog feel that our dogs get far more exercise off leash than on leash. It is not so much for our dogs that I am requesting that you keep at least the area of the East Beach of Chrissy an off leash area, but for the sake of the larger dogs who really need to be able to run and play leash free. On the whole, owners have been wonderful about picking up after their pets and keeping badly behaved dogs on leash. I believe the walk area just before the warming hut and on out to the fort is an on leash area. Dividing Chrissy in that way is acceptable I believe. But to restrict the whole of Chrissy Field plus the other places you are planning to limit, leaves owners virtually no place where they can go to exercise their dogs adequately. Cannot we be fair to both dog owners and to non dog owners? Compromise is the key to satisfactory living conditions. Thank you for your time Ceseli Foster

Correspondence ID: 253 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 14:52:25

Correspondence Type: Web Form

Correspondence: I do not own a dog. I am a resident who enjoys running, biking and hiking in

Golden Gate park and Crissy Field. At Crissy Field's beach and greenway, it brings me happiness to see all beings - humans and dogs - able to play freely. When dogs and kids are able to release their pent-up energies by running around, they become happy, healthy, and playful. I have NEVER once felt unsafe around off-leash dogs. They are too excited exploring and romping to pay attention to me. Alternatively, I HAVE felt unsafe around human beings. A public park is a public park. If you are not going to ID potential criminals who walk onto the beach, then why restrict the most playful, obedient companion of humans - the dog? I ask the GGNRA to please not overreact, just because of a few bitter people. Allowing dogs the freedom to romp, will only result in happiness and playfulness for all.

Correspondence ID: 254 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 15:48:08

Correspondence Type: Web Form

Correspondence: I have enjoyed most of the parks mentioned both before and after the National Park Service acquired them. I have enjoyed them as a dog owner and for the long period I did not have a dog.

I can understand the Service wanting uniform regulations in all its parks. However, this park was created as an urban park unique to the system and as such retained traditional practices and uses for the urban residents surrounding the park.

With respect to the increased management cost, is removing human litter any less expensive. Also what is the ratio of dog related confrontations as opposed to human related confrontations?

Also what about the positive aspects of dogs in the park? Most dogless people I encounter in the park smile when they see my dog, some ask to pet him, and children hug him. He has enhanced their park experience, and they love his.

San Francisco is a diverse community and will reject any plan that renders park usage less diverse. And let's not forget dogs have been part of this ecosystem for over 10,000 years.

To sum up: all of the adverse effects in the report are the result of increased number of visitors to the park.

Correspondence ID: 255 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 15:56:16

Correspondence Type: Web Form

Type:

Correspondence: Fort Funston and Crissy Field are two of our dog's favorite spots. She loves the ocean and she loves swimming in it without a leash on. There are so few places these days to let our dogs be dogs...especially in SF. PLEASE preserve some of the most amazing places for our dogs to roam and be happy. We need these places as dog owners and our dogs need them too. We would pay more in our dog license fee to cover the additional costs of preserving these places for our dog's benefit.

Thanks for considering!

Correspondence ID: 256 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 16:52:44

Correspondence Type: Web Form

Correspondence: I AM A GREAT SUPPORTER OF OUR PARK AREAS...

...AND I AM ASKING YOU PLEASE DO NOT RESTRICT THEM FURTHER TO LEASHED AND OFF-LEASHED DOGS. IN ORDER TO HAVE HEALTHY, HAPPY WELL-ADJUSTED DOGS IN OUR COMMUNITY - WHICH BENEFITS EVERYONE (YOU HAVE TO ONLY SEE THE SMILES ON PEOPLE WHO SEE MY DOG!!!) - WE NEED TO HAVE ACCESS TO THESE IMPORTANT AREAS. IT MEANS EVERYTHING TO THE DOGS. IT HAS NOTHING TO DO WITHOUT WHAT I AS AN OWNER WANT FOR MYSELF. IT HAS EVERYTHING TO DO WITH WHAT MY DOG NEEDS. PLEASE DON'T TAKE THAT AWAY.

REGARDS,

PETER HAMADY COMPANION TO 10 YEAR OLD ANATOLIAN SHEPHERD

Correspondence ID: 257 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 17:26:30

Correspondence Type: Web Form

Correspondence: I respectfully request that dogs be kept on leashes in public recreation areas and that their access be limited. Dogs, especially when off leash wreak havoc on the environment.

Correspondence ID: 258 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 18:06:05

Correspondence Web Form

Type:

Correspondence: I applaud the NPS GGNRA staff for conducting what appears to be a thorough and thoughtful process in the face of adversity.

I am a frequent park user and feel like dogs on leash on large trails is a good thing. I don't think ROLAs belong in a National park. That use is suitable at local parks set up for that use without significant natural and cultural resources. I am particularly concerned with the ROLA on Crissy beach. So many significant natural resources are nearby.

Thanks you, Mark

Correspondence 259 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,21,2011 18:36:37

Correspondence Web Form

Type:

Correspondence: I am a dog-owning resident of Northern California writing to say that I am so disheartened to hear of your plans to make even MORE public lands illegal for off-leash dog use. Visiting such areas is a vital part of my life, for my family and my dog. Please do not eliminate any areas that are already legal for this. In fact, add more! Thank you for listening.

Correspondence 260 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,21,2011 18:37:34

Correspondence Web Form

Type:

Correspondence: As a tax payer and dues payer of the parks system, I love to walk my dog in nature. It remains one of my joys to see animals outdoors.

I sincerely hope that dogs are not prevented from parks. It makes no sense to me. I also like to see dogs allowed to be off leash (like at Fort Funston). They are animals, it is nature, I always pick up the poop. So what is the problem?

pLEASE do not restrict any more areas from letting dogs walk and run.

Thank you

Jocelyn

Correspondence 261 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,21,2011 19:40:29

Correspondence Web Form

Type:

Correspondence: While I am sympathetic with the need for dogs to have room to run, I find it very unpleasant to smell or step in the 'poop' that is often left where they do. A dog that has its own place to run will choose a spot, usually, for its bathroom. Not going wherever, whenever. However, dogs do like to mark that they've been there? wherever that is and, all too often, it's where I'm walking. :(I truly think that spaces set aside for dogs to run, where owners are responsible for clean up and are the one's who are most affected, is the best solution. Obviously, that can't be every park and path. I have no problem with setting aside areas for the dogs? I'll respect their space and not intrude. I'd like the same from their owners and the dogs themselves.

Correspondence ID: 262 **Project:** 11759 **Document:** 38106

Received: Jan,21,2011 19:48:37

Correspondence Type: Web Form

Correspondence: Please keep all publicly owned land open to dogs, preferably offleash.

Correspondence ID: 263 **Project:** 11759 **Document:** 38106

Received:

Jan,21,2011 19:51:12

Correspondence Type: Web Form

Type:

Correspondence: This area has peacefully coexisted for years. Why do we need to make changes? The dogs are well behaved and the owners are respectful of the native species and plants. We need this to stay dog friendly.

Correspondence ID: 264 **Project:** 11759 **Document:** 38106

Received:

Jan,21,2011 21:16:46

Correspondence Type: Web Form

Type:

Correspondence: To Whom it May Concern: I have read parts of your huge EIS and tried to understand the Executive Summary, which baffles me. I wonder if you are trying to obfuscate the real reasons for your extreme position regarding dogs. I live in Muir Beach and this has been a dog-friendly beach for many (40+) years. I have lived here for 16 years and can see the beach from my window. Most of the times I see dogs frolicking at the waters edge and swimming. They are having more fun than the people and they are far less destructive than the people also. If a dog wanders into the "new lands" area, it is the responsibility of their guardian to call them back....if that doesn't happen it is the person who is at fault since dog's can't read signs. On a nice weekend most of the playing in the creek mouth is by children who often build dams (mostly boys) across the endangered salmon habitat. After a big weekend there is also a lot of trash that I pick up as do others in my community. I never saw a dog leave trash behind, unless you are talking

about their feces and again, a responsible pet owner picks that up. There is definitely far more destructive behavior perpetrated on this area by humans than by dogs.

Muir Beach is a wonderful place to live - surrounded by open space and vast hiking trails....unfortunately we have only one trail (the coastal trail) where we can hike with our dogs and you want to take that away from us too. If I understand your position, the only place dogs would be allowed is on Pacific Way and the beach parking lot. Really, that is absurd. Muir Beach is a small beach that is dog-friendly. People who do not like dogs can go to one of the many beaches in the area that are already dog-free. Why would you want to take away the one beach left for people to recreate with their dogs. I thought Golden Gate Recreation Area was for recreating - and that means playing at the beach with your children and/or your pet. Children are far more noisy and destructive yet you wouldn't think of banning them....so why are you picking on dogs? Especially here in probably the most dog-friendly area of the country. From what I read in your EIS you are suggesting that people and their dogs go to Little Beach! This is ludicrous. The road to and from there (sunset way) is not equipped to handle any more traffic. It is basically a fire road and needs to remain that way. There is no parking and what little there is on the roadside is usually residential parking. There are no facilities at Little Beach and during the winter months the beach is pretty much unusable as the sand washes out and it becomes just another bit of rocky coastline.

I read that 99% of GGNRA land is already dog-free - that means 1% is available for people and their dogs. If this is in response to people not liking dogs I find it difficult to believe that the NPS could not let us keep the measly 1% that we have to enjoy our pets. I actually feel that this whole issue should be turned around and dogs should have more off-leash areas when there is such a minute portion of federal lands where they are welcome. What's with the bad attitude toward dogs? I hope that the NPS and the GGNRA can see the error of this plan and continue the status quo here at Muir Beach or, better yet, open more of the trails to people and their faithful companions.

Correspondence ID: 265 **Project:** 11759 **Document:** 38106
Received: Jan,22,2011 10:04:36
Correspondence Type: Web Form
Correspondence: I live very close to the beach, and run or walk on Ocean Beach at least 3 times a week. I love seeing dogs playing and running around, and appreciate how many dog owners have good voice control of their dogs, and clean up after them with great care. Although I do not own a dog myself (allergies), I enjoy having friends with dogs come visit and often take them down to the

beach for some doggy fun.

I also recognize that not everyone shares my comfort level with dogs, and that some might not be able to enjoy the beach as I do if dogs are allowed everywhere.

And I also love seeing the sweet snowy plover running with the waves. We are so fortunate to have a range of amazing and beautiful wildlife so nearby. On days when I don't want to leave my cozy house to get some exercise I remind myself that I might get to see plover or some of my other favorite shorebirds, which gets me out and down to the water.

I think the park service has shown great sensitivity to the many competing needs and interests at Ocean Beach. The preferred alternative plan allowing dogs off leash on the northern end of the park, and then allowing for an area with no dogs further south appears to strike a good balance. Although it might mean that people who live further south would have to walk or drive their dogs the short hop up to the northern parking lot they would retain a great nearby place to play and enjoy, while allowing for some much needed dog free zones.

At the moment, although there are intended to be leash-only areas I very rarely see any dogs on leash at ocean beach. I have even seen dog owners encouraging their dogs to chase the birds to get more exercise, not realizing how vulnerable the snowy plover are. I have also seen disagreements erupt between dog owners and beach visitors who are uncomfortable with naturally friendly and curious dogs. Perhaps if there are clearly designated dog zones and dog-free zones some of these tensions can be more easily resolved.

Correspondence ID: 266 **Project:** 11759 **Document:** 38106
Received: Jan,22,2011 10:57:43
Correspondence Type: Web Form
Correspondence: I have a German Shorthaired Pointer who needs ample room to run off leash. It is extremely difficult to find beaches and parks where dogs are allowed off leash. The preferred alternatives for some of the areas restrict off leash areas even more. Please consider allowing more off leash areas for dogs who simply like to play fetch in an open area with other dogs.

Correspondence ID: 267 **Project:** 11759 **Document:** 38106
Received: Jan,22,2011 12:29:27
Correspondence Type: Web Form

Correspondence: Dogs need a large area to run especially large dogs. By restricting the GGNRA to dogs on leash, that will force all dogs into dog parks which are far too small especially for large breeds. People that don't own dogs simply don't understand this point. The GGNRA is not a national wildlife preserve, it is a recreation area as it states in it's title.

Correspondence ID: 268 **Project:** 11759 **Document:** 38106

Received: Jan,22,2011 00:00:00

Correspondence Type: Web Form

Correspondence: There are more dog owners than ever. The state and national parks need our tax dollars more than ever. Limiting usage to people without their companion animals limits the money and support you will get from people. Not only that but dog owners are tax payers too and using dog owners as a scapegoat so you can make things "easier for you" is not going to work in the long run.

Dog owners will pay lobbyists for their right to be on tax payer property with their companions. We are very serious about maintaining our rights. Owning an an animal is not a "one time deal" for the majority...it is a lifelong decision and we always will have them.

ATV's, mountain bikes, strollers, etc are all allowed but dogs on leash you want to prohibit? Dogs off leash during certain hours has somehow left you open to some sort of liability perhaps? Remember that WE OWN YOU and not the other way around

Correspondence ID: 269 **Project:** 11759 **Document:** 38106

Received: Jan,22,2011 13:28:14

Correspondence Type: Web Form

Correspondence: I understand the need to balance and protect natural resources- but a balance does not appear when there are few to zero areas for which dogs can run off-leash. Dog owners and dog walkers rely on these areas to ensure the sanity and safety of our dogs. If these resources become only for humans- our city parks with small dog-runs will be overburdened with dogs who are not properly exercised. Without exercise, like humans, dogs will not only be mentally challenged but curbing their natural instincts for exercise will make for complicated gatherings at dogs parks already overrun and burdened with human excrement and trash. I am speaking of the two parks (Duboce and Dolores) near my house where it is not safe for my dog to play with other dogs. Appropriate percentages of off-leash spaces helps the communities in the cities and other humans- there are already extremely large areas of the city and surroundings dedicated to only humans-

cramming dogs into even smaller spaces because people want 100% all areas for people only is not sustainable or reasonable.

Correspondence ID: 270 **Project:** 11759 **Document:** 38106

Received: Jan,22,2011 14:00:00

Correspondence Type: Web Form

Correspondence: My animals are my family. They need to thrive by running and playing just as a child would. If they are not allowed to do so, just like a child, they will develop anxiety issues which may cause a collapse of the family environment. They poop, we clean it up. They do not venture in designated wild habitat areas. They are voice commanded. I would suggest dog owners need to buy a yearly "off leash" license. Possibly 100 dollars a year. The revenue would be tremendous and could be used for lots of things. I'm positive that dog owners would volunteer to help "police" those few dogs/owners that may need the rules explained. Please consider other possible options.

Thank you.

Correspondence ID: 271 **Project:** 11759 **Document:** 38106

Received: Jan,22,2011 14:21:12

Correspondence Type: Web Form

Correspondence: I am strongly against eliminating or further limiting access to GGNRA spaces for responsible dog owners and their pets. I pay taxes to use the areas just as others do, I abide by the laws set forth, my dog is well trained and under my full command at all times, I pick up after my dog. In contrast, parents that take their children to the GGNRA; I have witnessed many instances in which those people or their children do not abide by the laws--much less common courtesy to others who use the areas. I have personally witnessed dirty plastic diapers dumped on the ground or merely tossed into trash cans, infecting all open surfaces with fecal bacterial contamination where my dog's feces are completely picked up, securely bagged and disposed of properly immediately. On visits to the park, I see mostly candy wrappers and other trash from children and adults who do not bother to respectfully pick up after themselves. Most disturbingly, I have witnessed many instances in which careless adults have put children and other adults in danger by not supervising them properly. Put simply, if you expect me to leash my dog, the same should be asked of parents with children too young or knowledgeable or willing to behave appropriately. I am outraged that the GGNRA would consider putting me in a situation in which I would subsidize the recreation of only a segment of the population--in other words, financially support special interest populations. The right to the enjoyment

of public property belongs to everyone, including responsible dog owners. The behavior of a few "bad apples"--in this case dog owners, who do not act responsibly--should not dictate the behavior and limit the rights of others. A more balanced approach would be to greatly increase the negative consequences (e.g hefty fines, impound property, possible incarceration) to punish those who do not abide by the laws and to deter others who might consider breaking the laws.

If you are going to eliminate GGNRA access for dogs then you should also eliminate access for children because they too are capable of taking full financial or social responsibility for their actions.

Finally, the GGNRA eliminating or further restricting access for supervised, well-mannered dogs is short-sided. In a city with fewer and fewer children and a growing population of upwardly mobile childless dog owners, the loss of revenue from responsible dog owners would be more significant than the GGNRA is either willing to consider or able to estimate. The GGNRA cannot afford to alienate the population that delivers the greatest amount of financial and other forms of support.

I urge the GGNRA to rethink the current plan.

Correspondence ID: 272 **Project:** 11759 **Document:** 38106

Received: Jan,22,2011 14:54:43

Correspondence Type: Web Form

Correspondence: To whom it may concern, We are dog owners, tax payers, and home owners. This draft would restrict the off leash areas at Ft Funston and Crissy Field. Considering the hundreds of dogs that are at Ft. Funston or Crissy Field at any given moment during the day, this would be a disaster. Since I live in the Duboce Triangle, I know from first hand experience what limiting all dogs to a small space can do. Duboce Park has had a restricted area for off leash dogs for 2 years now and every time i take my dog there she gets covered in mud and becomes sick afterwards . I go to Ft. Funston and Crissy Field because of the wide open spaces and freedoms it affords allowing dogs to be dogs. My dog is never sick after playing at Ft. Funston or Crissy Field. My family has accepted the contained dog play areas in our neighborhood but please don't eliminate the privilege of largely unrestricted off leash play areas at Ft Funston or Crissy Field. I believe exercise is vital to healthy city dog living in San Francisco and having an off leash space such as Ft. Funston is critical to ensuring this.

Respectfully submitted, Barbara Maury Bonnie Johnson

Correspondence ID: 273 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,22,2011 00:00:00**Correspondence Type:** Web Form**Type:**

Correspondence: Many of the objectives of the proposed dog rules would be BEST achieved by simply closing the (all) park(s). That is, allowing no one to use the park(s) would avoid "conflict." Ditto for many of the other objectives. I own a small dog, and frankly would like many of the human users of most National Parks I've been to (with or without dog(s)) to be "on leash" or "prohibited," NOT their dog(s). [Indeed, I've some incidental experience to possibly prove that (a) owners, not dogs, should be licensed and (b) that people with dogs are more sensitive to "the environment" than the average visitor, and "for sure," tour bus folk.] I've no clue as to WHY you need to go thru this drill at this time (gotta be better things to occupy your time), but hopefully it isn't just a response to some squeaky wheels.

It seems that a win, win for you might be to "do" you "thing" within a few hundred yards of parking lots and let, indeed, encourage MORE "off leash" dog use "far away" from the "tourist" (bus) visitation points.

In any event, PLEASE log in a very, very, very, strong objection to MORE

Correspondence ID: 274 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,22,2011 00:00:00**Correspondence Type:** Web Form**Type:**

Correspondence: My previous statement was incomplete; please strike it from your record and replace it with the following statement.

I am strongly against eliminating or further limiting access to GGNRA spaces for responsible dog owners and their pets. I pay taxes to use the areas just as others do, I abide by the laws set forth, my dog is well trained and under my full command at all times, and I pick up after my dog. In contrast, I've observed parents with their children visiting the GGNRA and I've witnessed many instances in which those people or their children did not abide by the laws--much less show common courtesy to others who use the area. I have personally witnessed dirty plastic diapers dumped on the ground or merely tossed into trash cans, infecting all open surfaces with fecal bacterial contamination whereas my dog's feces are completely picked up, securely bagged and disposed of properly immediately. On visits to the park, I see mostly candy wrappers and other trash from children and adults who do not bother to respectfully pick up after themselves. Most disturbingly, I have witnessed many instances in which careless adults have put children and other adults in danger by not supervising children properly. Put simply, if you expect me to leash my dog, the same should be asked of

parents with children too young, knowledgeable or willing to behave appropriately. I am outraged that the GGNRA would consider putting me in a situation in which I would subsidize the recreation of only a segment of the population--in other words, financially support special interest populations. The right to the enjoyment of public property belongs to everyone, including responsible dog owners. The behavior of a few "bad apples"--in this case dog owners, who do not act responsibly--should not dictate national policy nor limit the rights of others. A more balanced approach would be to greatly increase the negative consequences (e.g hefty fines, impound property, possible incarceration) to punish all who do not abide by the laws and to deter others who might consider breaking the laws. If you are going to eliminate GGNRA access for dogs then you should also eliminate access for children because they too are incapable of taking full financial or social responsibility for their actions. Finally, for the GGNRA to eliminate or further restrict access for supervised, well-mannered dogs is short-sided. In a city with fewer and fewer children and a growing population of upwardly mobile childless dog owners, the loss of revenue from visitors who also happen to be responsible dog owners would be more significant that the GGNRA is either willing to consider or able to estimate. The GGNRA can't afford to alienate a large segment of the population that provides the greatest amount of financial support. I urge the GGNRA to rethink the current plan.

Correspondence ID: 275 **Project:** 11759 **Document:** 38106
Received: Jan,22,2011 18:42:42
Correspondence Type: Web Form
Correspondence: One of the best things about living in San Francisco is the unique opportunity dog owners have to enjoy the city's natural resources with their pets. Please don't take away off-leash dog walking priveleges in the GGNRA. The quality of my life, and the lives of many Bay Area residents, will be greatly diminished if the proposed changes to the dog management plan are enacted.

Correspondence ID: 276 **Project:** 11759 **Document:** 38106
Received: Jan,22,2011 19:19:08
Correspondence Type: Web Form
Correspondence: Please keep these spaces open (off-leash) to dogs. There are really no other options in the City where you can have an extended off-leash experience. It is important to the health of dogs and the health of the community to preserve access to those spaces.

Correspondence 277 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,22,2011 19:30:39

Correspondence Web Form

Type:

Correspondence: Greetings,

The document is fine and a good start. In my opinion leashes required rules should be extended to all public parks areas without exception.

My reasoning is that the needs of guide dog users are being ignored entirely. With dogs roaming freely, the guide dog team can be endangered. Dogs like to test each other. The average unleashed dog has not been trained in the discipline it takes to be responsibly unleashed unless that dog is in a fenced dog park.

An unleashed dog rushing the guide dog team can make the guide dog skittish and afraid. That puts the guide dog team at risk. If the guide dog is more worried about being rushed by another dog, that guide is not doing its job and injury to both the guide dog and guide dog user could occur.

The risk to the guide dog team is only the beginning. The guide dog may be retrained, however the reinforcement training may not work. That means the \$70,000 guide dog is now useless and the guide dog user is left without a guide all because of someone wanting to allow their dog to run loose.

Most people with pet dogs are not aware that there are state and federal laws governing distracting a guide dog. An unleashed dog charging the guide fits that criteria. Perhaps leash regulations will help prevent the unleashed dogs owner from paying for that very expensive guide dog.

I would urge changes to be made to these rules to account for guide dogs and guide dog users.

Regards,

Steve Lewis

Correspondence 278 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,22,2011 19:55:20

Correspondence Web Form

Type:

Correspondence: Dear GGNRA -

I am writing to you to express my disappointment in the new proposed plan with respect to the new dog leash rules. I am a local San Francisco resident

that uses Fort Funston on a daily basis. I respect the land and the other people who use it. I rarely encounter people who misuse the park and when I do it often results in a bit of intervention on my part. To be able to use Fort Funston as a place where my dog can run freely to release some much needed energy is such a great privilege. I know that places like this are rare near urban areas and I feel honored to live in a city that has such a bounty of natural beauty for access to nature lovers and dog lovers alike.

When I moved here in 2008 from the midwest Fort Funston was one of the first places I found to take my dog. Since then I have literally gone back almost every day. As the owner of a cattle dog that has a lot of energy, there really are no other places where I can take my dog to release some much accumulated energy. As a responsible dog owner, I know that when dogs don't get enough exercise they can get aggressive. Our walks at Fort Funston are an important part of her well being and my own. At the end of a long day working from home I find that a brisk walk through the park is just what we both need to feel the day's stresses are released. And on weekends my husband and I include Fort Funston as part of a regular exercise for us with our dog.

The new plan suggests the the area which would allow off leash activity would be limited to a small section near the parking lot and a stretch of beach. There are a few problems with this proposal. I'll start with the section by the parking lot - this would dramatically concentrate more off leash dogs into a smaller area thus leading to dog management. Dogs don't always like to be near other high energy dogs. Mine prefers wide open spaces and not necessarily large groups of dogs and activity. Furthermore, since the area is not fenced it may cause issues with dogs that run into the parking lot where there is traffic thus endangering the dog and drivers. Most people I know walk away from the lot before they unleash their dog but I fear that since they will not be able to go far they'll end up staying closer to the parking lot than is advised. The other issue with the proposed beach-only area for off leash activity is that it puts pressure on people to have to go down to the beach which does not always work. I for example don't often go to the beach because my dog will get wet. Some people worry that their dogs will get swept up in the waves or tide. Some hunting dogs cannot resist rolling in the dead birds, fish or seals that wash up on the beach nearly every day. And above all, the tides sometimes render the beach nearly impossible to use because of how narrow it can be.

In summary, I really believe that reducing the amount of options where people can exercise off leash with their dog just leads to more problems for dogs, dog owners, and the land. I would like to remind you that as a daily user of the park - the problems that I see are not nearly at the level of concern that warrant this stricter approach to land management. Naturally, I don't pretend that there are no irresponsible dog owners that visit the park.

But those are far fewer than many people realize. I feel the new leash-laws at Fort Funston in particular are overcompensating for a few irresponsible owners and a few visitors who don't have enough experience with dogs and parks in general. Rather than managing to the least common denominator let's allow this park to remain leash free so that it can be enjoyed by so many dog owners.

Thank you for the time you took to read this letter. I hope a more workable solution can be presented that will allow responsible residents and dog owners to remain users of the park and this great privilege.

Sincerely,

Natalia N. Baldwin

Correspondence ID: 279 **Project:** 11759 **Document:** 38106

Received: Jan,22,2011 21:42:40

Correspondence Type: Web Form

Correspondence: I'm writing to protest the overly restrictive elements of the preferred plan, particularly with respect to Fort Funston .The impacts of the proposed restrictions on my family's use of these resources would be moderate to major and adverse, to use your nomenclature.

One general comment is that GGNRA does not appear to take into account the negative impacts of restricting dogs on the alternative city and municipal parks.

A better alternative for Fort Funston would be: 1. ROLA on the beach, switching to on-leash during vulnerable periods for Bank Swallows. 2. On leash on the trails north of the beach access. 3. Improved demarcation and maintenance of trails to keep dogs off the vegetation.

I also request that you consider a dog license system with a reasonable annual fee that would allow dogs full use of the park and go into a fund used for restoration and mitigating adverse impacts.

Sincerely,

Matt Chanoff

Correspondence ID: 280 **Project:** 11759 **Document:** 38106

Received: Jan,22,2011 22:25:54

Correspondence Type: Web Form

Type:

Correspondence: As a regular user of Fort Funston with my three dogs spanning the last 25 years, I've seen the interest and use of the park increase dramatically over the decades. People flock to its beach, vistas, and open space to hike, lounge, and make memories. I go there most often to exercise and socialize my dog. Although I can accomplish some of this at a neighborhood park, I find my experience is greatly enhanced by the beautiful setting and the walking necessary to make the fantastic loop from the parking lot down to the trail junction near the Great Highway and the Coast Trail and back again. On the rare occasions I've seen dog-on-dog conflicts, owners and other people have quickly stepped forward to correct the situation, often educating the dog's owner on behavioral techniques in the process. Often the aggressor is the leashed dog since it's placed in an inferior position compared to the off-leash dogs. The better a dog--and its owner--is socialized, the fewer problems result. Restricting areas for the socialization of dogs and people is counterproductive. I can't overemphasize the importance of off-leash areas for dogs in the GGNRA. Clearly, Alternative A is our only option.

Correspondence ID: 281 **Project:** 11759 **Document:** 38106

Received: Jan,22,2011 22:36:10

Correspondence Type: Web Form

Correspondence: As a dog-owner, I feel the recommendations set forth in this proposal are an adequate compromise for all visitors to the GGNRA. I was left with the impression that dogs were banned in as few areas as possible, while maximized dog access through on-leash requirements. I believe on-leash regulations are in the best interest of all park visitors - it allows for dog-owners to enjoy their pet companions in our public lands while respecting non dog-owners and protecting the dogs themselves. Although all owners believe their pets are friendly and would never cause trouble, the truth is you can never be sure what unforeseen circumstances may cause a dog to act out of its usual behavior pattern. Moreover, one is never guaranteed of the responsibility and conscientiousness of OTHER dog owners or the temperament of their pet towards humans and pets alike. It is for this latter reason that I am cautious about taking my beloved dog into off-leash areas, and which brings me to my only recommendation for the new pet regulations in the GGNRA.

As ROLAs are to be permitted in some areas under the preferred alternatives, I would recommend the GGNRA follow the example of the City of Boulder, Colorado and establish a certification program for voice-control (i.e. off-leash dogs). The completion of such a certification program, and evidenced by a highly visible tag on the dogs' collars, would likely further reduce the potential for conflict between off-leash dogs and create a

safer environment overall. In addition, it would provide visitors taking their dogs to ROLAs an extra sense of confidence that the other dogs (and their owners) have demonstrated the ability - and more importantly the willingness - to abide ROLA guidelines and regulations. Such a program would also allow park rangers and law enforcement officers to more easily enforce the rules of the ROLAs. Although the ROLAs will allow for separation between those visitors with and without dogs, it might also offer benefits to the latter group by reducing their concerns, causing fewer complaints and perhaps even encouraging visitors who might otherwise avoid the GGNRA.

Correspondence ID: 282 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 00:00:17

Correspondence Type: Web Form

Correspondence: I wholeheartedly support the dog management plan. I often take my son to Crissy Field to play at the beach and practically every time we are there, a dog or dogs will come up to our picnic area and try to steal food or urinate on us and the owners do nothing. There is a sense of arrogance I get from the dog owners, they feel because the beach is a no leash area, we are there at our own risk. In fact, one dog owner did try and blame it on us for having a picnic in an area where dogs roam free. My son loves playing at Crissy Field, we spend almost all our vacation days there with his friends playing in the water, but the constant need to fend dogs from urinating or running through our picnic area is one experience I can definitely do without.

Correspondence ID: 283 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 00:37:00

Correspondence Type: Web Form

Correspondence: The dog is called "man's best friend" for a reason. As free citizens of a free society, all dog owners would be distressed if parks and beaches would become off limits to the faithful friends that share their lives. As tax paying, voting citizens, we eagerly share the beauties of the natural world with our canine friends. We ask that we not be driven off the land we love and support.

Correspondence ID: 284 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 00:55:49

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I am writing to register my comments on the proposed changes for dog rules within the GGNRA. While I support reasonable and safe off-leash use of all of the GGNRA, I am specifically addressing the proposed "preferred" changes to Muir Beach and the adjoining Coastal Trail and Fire Road in the Marin Headlands. These new proposed "preferred" changes should not and must not be enacted. They are not what the public wants, they are a huge waste of resources, they are not supported by data, and they are poor and impractical policy. They attempt to "fix" problems that don't exist, and unfairly restrict the use of the park to a large segment of the public.

The park of Muir Beach exists within a community that has existed for over a 100 years, far longer than the Park Service's stewardship. This is a vibrant community full of families. Dogs are a part of many of those families. Dogs are a part of this community and the nearby surrounding communities and municipalities. While I acknowledge and appreciate that it is the existence of the park that protects the land around Muir Beach and preserves the open space, I feel the Park Service is overreaching. Muir Beach is not some remote pristine wilderness or wildlife refuge. This isn't Yellowstone or Glacier National Park. The GGNRA is effectively an URBAN park system for the Bay Area. These parks exist for the enjoyment and recreation of the public--a public that owns dogs. Our tax dollars support these parks FOR THAT PURPOSE. That's why the GGNRA was established. That should be the primary driving force of policy for the park.

Let's face facts. People do far more damage than dogs. And I don't see any drive to ban people from the GGNRA. I have had to, on MANY occasions, admonish adults for letting their children literally gouge away at the hillside and dunes, and letting them destroy or pull wildlife off of rocks. I am talking blatant, deliberate and somewhat viscous destruction of the flora and natural formations of the beach by ignorant people. I have pulled soiled diapers out of the sand. I have had to scold tourists for trudging under the ropes to shortcut through the estuary. My best friend's 3 year old son got 3rd degree burns on his feet because of hot stones not in a fire ring laying about in the sand. My dad had to distract my grandmother while two people had intercourse in the sand next to where my parents had set up their blanket with their children. Families play in the restored estuary on hot summer days, partly because Little Beach is inundated with nude people and they can't take their children there-even though the waters are calmer and it is their neighborhood beach. We tried to get the Park Service and the County to deal with that, but we were told very clearly that neither authority wants to police Little Beach to enforce existing law that prohibits nudity in Marin County. But I digress. As a very fortunate resident and DAILY user of the whole of Muir Beach, I can say unequivocally that it is the humans that cause most of the problems. And whatever problems dogs are perceived to be the cause of can be remedied by enforcing existing dog rules, by fine if

necessary. The last thing that is needed in this time of economic crisis is some draconian policy that punishes responsible dog owners and that requires expensive and heavy-handed changes to the existing rules. Maybe those resources would be better utilized keeping the beach clean and free of REAL hazards like lewd behavior, ignorant beach goers, dirty diapers, broken glass and rogue burning embers. Those are the things that really threaten Muir Beach.

Muir Beach has NEVER been a no-dog experience and beach goers visiting Muir have no reason or special rights to think or expect that it should be otherwise. Our society is not dog-free. Why is that suddenly a priority or goal??? Why is the NPS trying to change Muir Beach to be something for a segment of society who doesn't, for the most part, even come to Muir??? In all my years of living in and coming to Muir Beach as a life long Marin resident, I have never once, ever had an incident on the beach with someone bummed out about my dog. Muir is mostly full of dog lovers, or newcomers who either like it or they don't. Go on YELP to see how many people love Muir and how few people complain about the dogs. For those who want a completely dog-free beach experience, they can go to the park portion of Stinson Beach. It's big, wide, park-like and dog-free and way easier to patrol and enforce.

Why is there no suitable alternative/map for Muir Beach like having leashed dogs on the dry sand and then off leash and under voice control on the wet sand? Why are the alternatives for Muir Beach so all-or-nothing? It makes no sense to let dogs off leash at the lot, or even at the bridge, or on the path of dry sand that goes to the beach. Why not allow unleashed dogs down by the water, but leashed on dry sand? Dogs that don't stay engaged with their owners at the surf line would have to be leashed. This is what a "compromise" would look like. It would reinforce responsible dog ownership, and it would keep dogs away from the estuary, and away from people's blankets. The NPS presented no alternatives that offer any sort of reasonable compromise. Wedging a ROLA at the south end of the beach doesn't make sense because often there isn't even beach there. The whole point is to allow people to stroll and run with their dogs. The ROLA doesn't accomplish that.

To address the Park Services completely ridiculous assertion that dog owners and walkers can go to the little County-owned beach adjacent to the Park instead, let me put that notion to rest right now. Why is there no EIR or EIS for THAT proposal???? Little Beach is not accessible without crossing the main beach or driving along neighborhood private streets. Most of the time, the rocks are impassible because of surf and tides. There is NO PUBLIC PARKING WHATSOEVER on Sunset Way or Pacific Way. Both roads are private, with no shoulder parking and all spaces belong to homeowners. All lanes are fire lanes. Extra and illegally parked cars would

create a hazard for the surrounding community in terms of blocking access to emergency vehicles. For those who would arrive on foot via the road, there are no amenities or services for Little Beach. No public trash cans. No toilets. Sometimes, there's not even a beach. Pushing people over to that beach for use with their dogs is not an acceptable or desirable solution or alternative. Formally stating and implementing such a plan (see NPS Preferred Alternative, page 2), without the proper studies for the impacts will be met with a vigorous and serious challenge by the surrounding community. The fact that this is a published statement in support of the "preferred" alternative for Muir Beach seems like sloppy environmental consulting at the very least, and a violation of law or code at the worst.

The other major issue of concern is the proposed changes to the Coastal Fire Road and Coastal single-track trails within the Marin Headlands system. These changes are unacceptable. As it is now, those are the ONLY remaining trails from Muir Beach that are open to dogs. There is virtually no other trail for people with dogs to use, and there must be a trail system for people with dogs! The Owl Trail is a no-no, as is the Heather Cutoff, the new Diaz Ridge Trail, the Redwood Creek Trail, the Coastal View Trail, and the Green Gulch trails. As a woman who likes to hike alone, this presents a serious safety concern. Without my dog, I do not feel comfortable hiking by myself. In addition, there is not a legal way for a person needing to walk, for whatever reason, between Muir Beach and Mill Valley. There is no reason to not be able to walk to or from Mill Valley with a dog. My car broke down one day, and I had a friend drop me off, along with my dog, at the top of the Miwok Fire Road so I could walk home. En route, I was stunned to learn that I had no legal way to do this, but continued to walk with my dog down Coyote Ridge until I safely reached home in Muir Beach. There is no scientifically supported reason to ban leashed dogs from these trails. I will continue to walk with my leashed dog for my own safety, whether the law changes or not. One of the members of the fire department out here in Muir laughed at me and said that I shouldn't worry about needing to take my dog illegally on the trail because I could just carry a loaded gun instead. We laughed over that sad irony. It's just flat out wrong, and the NPS needs to address this serious problem with the trails in the GGNRA. At the very least, the Coastal Trail and Fire Road MUST remain dog-friendly. Map 7A, with an additional dog-friendly access of the Coyote Ridge Trail to Miwok Fire Road is a no-brainer as the minimum way to go.

The GGNRA was established for the protection of our splendid open spaces, and the enjoyment and recreation of the public. Whatever changes the Park Service proposes must accommodate ALL of us. We all pay for the park. It belongs to everyone. This is our commons. And these are our dogs. We need to make it work for everyone. Any solution put forth by the GGNRA has to meet that minimum threshold. The "preferred" plans do not.

Thanks for your consideration and time,

Sincerely,

Laura Lovitt Pandapas Muir Beach, CA 94965

Correspondence ID: 285 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 02:08:07

Correspondence Type: Web Form

Correspondence: As a San Francisco dog owner and off-leash enthusiast, I hope you will consider the following options:

1. Allow off-leash use at limited hours: before 10am and after 4pm
2. Limit dog walkers and the number of dogs allowed per person. When I see a walker with 10 dogs, 4 on leash, 6 off, I know there will be problems.
3. PLEASE consider the needs of dog owners in your plan. We love SF and its environs, 98% are very responsible owners and will happily comply with restrictions - - but don't take these amazing places away from us - give other plans a trial period but please - WORK WITH THE PEOPLE, FOR THE PEOPLE -

Thank you, Lori McKay San Francisco

Correspondence ID: 286 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 08:03:29

Correspondence Type: Web Form

Correspondence: I don't even own a dog, but think your proposal to limit dogs on park land is terrible. It's a joy to see the dogs run & play at Muir Beach. And dog ownership in Marin County is a big thing -- you are limiting access to people who want to enjoy the outdoors with their companions (their dogs) for what reason? How many more restrictions are you going to put on people? The dogs aren't hurting the beach. Maybe signs need to be bigger about cleaning up after their dogs, but honestly, I've never had an incident where I've found any dog poo on the beach. I don't think this is such a big deal.

Correspondence ID: 287 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 08:55:18

Correspondence Type: Web Form

Type:

Correspondence: If you ban dog walking in SF and Muir etc. you are going to push all of those people on Stinson and Bolinas etc. Please allow private dog walking in SF and Muir etc. Ban commercial dog walking if you must.

Also I think there should be some sort of permit/license to walk your dog on these beaches with a test of the dog as to obedience.

Correspondence ID: 288 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 08:56:36

Correspondence Type: Web Form

Correspondence: In your overall statement, you state that "The purpose of GGNRA is to offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic, and recreational values."

So your large and diverse population doesn't include the thousands upon thousands of dog owners in the bay area, nor those same dog owners that appreciate the 'recreational value' of the park perhaps more than anyone else. As a long time resident dog-owner of the area, we've been running our dogs at Chrissy Field and Fort Funston for over 20 years. They are just the types of places where you can only go with dogs if you go off-leash. Clearly you do not own dogs or understand the ridiculousness of taking a dog to the beach on a leash. Running is what dogs do best and you want to take several of the best places for them to do that away.

Dog owners, for the most part, are respectful of their environment and other people and dogs. As long as bags are provided and trails clearly marked, there is very little impact on the surroundings.

As for conflicts, yes, there are some that set a bad example, by not restraining dogs that are clearly aggressive, but perhaps you could deal with that in PARTICULAR, rather than ban ALL dogs on the whole. Look at places like Pt. Isabel, where signs clearly state that aggressive dogs must be on leash. They are on leash, and if not, they get reported and don't come back. It works. The same goes for commercial dog walkers that have too many dogs for one person to control. Try limiting the number of dogs per person to whatever the county limit per household is - that way you don't have one person with 10 dogs that aren't necessarily under control.

Just reading your report made me furious. It is so unfair that you feel the need to take away several of the best places in the area to walk our dogs. Places where the ENTIRE FAMILY can go to appreciate the natural, historic, scenic, and recreational value of the parks. How many places do we

have to go, where we can ALL go to spend the day together? Perhaps you think we ought to just ban dogs from our lives altogether? They are part of our FAMILY and should be allowed to go where we go as long as we pick up and control them. Children are allowed to go everywhere, make messes, destroy wildlife, and be completely out of control of the parents. Yet dogs, in your opinion, should stay home, on a leash, and be excluded from the family.

Correspondence ID: 289 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 09:04:42

Correspondence Type: Web Form

Correspondence: It is quite clear that the Park Service wants to force more restrictive dog laws in these areas regardless of what the public wants. In the Bay Area (especially) there are always people who will complain about anything that is not exactly the way they would do it...hence, complaints by a few about the many well behaved and well controlled dogs in the various areas where more restrictions are being contemplated. And the Park Service is quite willing to go along as it will make their jobs easier....the majority of the public be damned. These restrictions are unnecessary and unwarranted. The existing rules have worked for a long time...but the Park Service continues to show its determination to have its way including the manner in which the public hearing process is being managed without an open microphone for speakers at the various locations. DAMN YOUR PLAN! DAMN THE PARK SERVICE.

Correspondence ID: 290 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 09:13:24

Correspondence Type: Web Form

Correspondence: I am absolutely opposed to any restriction on access by off-leash dogs and their owners to GGNRA areas. San Francisco is a major city with thousands of dog owners, and our options for off-leash exercise and socialization (which is key to keeping dogs well-behaved) are limited. I am also appalled that the GGNRA is refusing to even hold public hearings on this issue. If the GGNRA does restrict access, I will certainly vote to elect officials who will reduce GGNRA funding as much as possible and replace current GGNRA officials with those who will better serve the public, and will encourage everyone I know to do the same.

Correspondence ID: 291 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 09:18:05

Correspondence Type: Web Form

Type:

Correspondence: Reducing the already minimal space where dogs can run off leash is simply unacceptable. Currently, dogs are allowed in approximately 1% of the GGNRA area. This is a ludicrously small percentage of space as it is. To reduce it even further is draconian. Dogs need plenty of space to run off leash, and dog owners are entitled to use the GGNRA. I would point out what should seem perfectly obvious, but apparently is not to some groups - that dogs and their human owners are as much a part of nature as any plants or birds, and have a right to enjoy the natural space around them. This plan must be reconsidered with the needs of dogs and their people in mind. Thank you.

Correspondence ID: 292 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,23,2011 09:48:45

Correspondence Type: Web Form

Type:

Correspondence: This would be DEVASTATING to the livelihood of our dogs. I simply cannot fathom the devastation this would cause to the animal population of san francisco and many our residents - PLEASE PLEASE PLEASE PLEASE PLEASE PLEASE reconsider.

Correspondence ID: 293 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,23,2011 09:54:47

Correspondence Type: Web Form

Type:

Correspondence: I am writing to voice my great concern over the proposed plan to ban dogs from Muir Beach. Let me first say that I am one of the thousands of "responsible" pet owners. My dog is trained, friendly, on-leash at all times, and picked-up after. It may sound silly to some, but my dog is family. He has been in my life for 10 years. Muir Beach has been our place. In fact, I decided to move to the Washington neighborhood of the Presidio entirely because of him. We lived there so happily for years, and I passed on "nicer" housing options because the benefit to my dog was incomparable as was the beauty that surrounded us. Without being able to share the park with my dog, living in the park would never have crossed my mind.

In June, my fiance and I bought a place in Rockridge and we moved. Our dog has adjusted to the east bay, but it is the weekly trips back to Muir Beach that bring us all the most joy. It is hard to describe how special that place is to us, or the joy we derive from being able to spend time there together as a family unit. That is why, when it came time to choose a location for our wedding, Muir Beach was the natural choice. Our wedding will take place on Muir Beach in October and our beloved old dog, Redford, will be in the wedding. If the recommended policy is in effect by then, we

will have to begin a new search for another beautiful spot. One where the threat of litigation does not lead to fear-based and discriminatory policies. One that we can cherish with our pet as well as our children in the years and decades ahead.

It breaks my heart to know that we may lose this place and have to move on. Who will refund our deposit at the Pelican Inn? The members of this committee? If environmental concerns are paramount, why should people continue to be allowed to disrupt natural habitat and leave waste on the beach?

It has long been our dream to buy one of those little homes perched on the cliff, but if Marin County adopts this brutal and reactionary policy, the spirit of fun, love and acceptance that has long-endured in this sacred place will be lost.

Sincerely, Khori Dastoor Oakland, CA

Correspondence ID: 294 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 09:56:43
Correspondence Type: Web Form
Correspondence: I've lived in Muir Beach since 1973 with my various dogs and walked both the beaches here almost daily.

I WILL to continue to walk these beaches with my dogs running freely till the day I die. As far as I'm concerned, the NPS can fuck off out of Muir Beach and take its "dog plans" and its other crap with them. i have no intention of obeying any restriction on my right to walk my dogs on Muir Beach.

Correspondence ID: 295 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 09:59:02
Correspondence Type: Web Form
Correspondence: The most important comment is that dog owners should clean up after their pets. Having owned 4 dogs in the past 40 years I found it necessary to be sure to clean up. I also clean up after dogs defecate on my lawn. Pets should always be under voice control.

With the large number of pets in San Francisco there needs to be space where dogs can run off leash.

Correspondence 296 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,23,2011 10:07:27**Correspondence Type:** Web Form**Type:**

Correspondence: The preferred alternative plan for Ft Funston is not a fair compromise for off leash dogs. Off leash dogs need space for proper socialization. Walking dogs on leash on the paved paths does not allow for dog play. Many leashed dogs feel threatened. I physically can't walk on sand to the proposed off leash beach area easily. The proposed small sandy area isn't large enough for exercising myself or my dog. Enforce dog neutering laws especially in parks. Limit the number of dogs per person. Those are probably fair changes. We don't have enough large open spaces for dogs as it is. Humans can have the rest of the world. Leave Ft funston as it is.

Correspondence ID: 297 **Project:** 11759 **Document:** 38106**ID:****Received:** Jan,23,2011 10:13:23**Correspondence Type:** Web Form**Type:**

Correspondence: For the past decade, my wife and I have been regular visitors (at least once a week) to Crissy Field. Our use of the park is primarily to run, stroll, picnic and relax on the beach - particularly East Beach. We are not dog owners, but we love the mix of people and pets that this unique location brings together. My experience has been that the dog owners are a very responsible group and are attentive not only to their pets but the rights of non-pet owners to enjoy the park in their own ways.

I am opposed to the new proposal for Crissy Field. Specifically, I am opposed to imposing leash restrictions on dogs at East Beach. We enjoy the area as non-dog owners and find that the mix of people and pets using the area actually enhances our own recreational enjoyment of the park. We've spent countless hours on the beach and have never witnessed bad behavior on the part of pet owners. We urge you to revise the Crissy Field East Beach restrictions called for by this plan, to restore the rights of pet owners, and to preserve the opportunity for all these diverse groups to enjoy the area as they do today.

Correspondence ID: 298 **Project:** 11759 **Document:** 38106**ID:****Received:** Jan,23,2011 10:19:53**Correspondence Type:** Web Form**Type:**

Correspondence: Excellent work in the plan to protect wildlife and birds. Domestic cats and dogs are responsible for the demise of millions of birds every year.

While every dog and cat owner is very attached to their animal, dog and cat

owners do not have the absolute right to impose their animals on wildlife, and people in public places that don't want to be bothered by off leash animals.

When a loose dog runs up to you, you have no idea whether it will ignore you, bite you, bite your child, or stick it's nose in your crotch!

Birds at the beach naturally know that dogs are predators and they try to fly away. There are too many off leash dogs interfering with wildlife and people trying to enjoy the area.

Dogs are not people! Dogs are dogs!

Every dog owner believes that their particular dog is a good dog, and would never bother anyone.

Dog owners who think they have the right to take over every public area are selfish.

I strongly support the plan's restrictions on off leash dogs. Congratulations on being brave enough to make the right decision, despite a vocal and angry crowd of dog owners.

People who want their dogs to run free should buy a farm in the country; they should not force their animals to live in a congested urban area.

The violence of some "animal rights" activists causes me to withhold my full name out of fear. Sadly, some "animal rights" supporters think animal lives are more important than peoples' lives. They are wrong.

Correspondence ID: 299 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 10:25:42

Correspondence Type: Web Form

Correspondence: I would like to express my support for the proposed new restrictions on off-leash dogs in the GGNRA. As a Sunset district San Francisco resident, I see first hand the frequent abuse of the park by dog owners. Too many owners allow their dogs to roam freely (when supposedly under voice control or on leash), chasing shorebirds and defecating freely. These areas are PARKS, and are intended to protect, preserve and showcase our natural resources and beauty, not to serve as convenience areas for domesticated animals. Thank you for your courageous stand in the face of very vocal special interests.

Correspondence 300 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,23,2011 10:33:37**Correspondence** Web Form**Type:****Correspondence:** Dear GGNRA,

I whole-heartedly support restricting dogs in our federal parks. Our parks and beaches have become over-run with off-leash dogs who's owners ignore signs warning of sensitive habitat. I support protecting wildlife, wild birds and native plants. I was born and raised in San Francisco, a bird-watcher and I thank you for addressing this problem.

~Jeanine Strobel

Correspondence 301 **Project:** 11759 **Document:** 38106**ID:****Received:** Jan,23,2011 10:38:03**Correspondence** Web Form**Type:****Correspondence:** Dear GGNRA. I'm not a dog owner, nor lover, but I LIKE the dogs running around Crissy Field and the East Beach, Presidio, SF. The owner's are responsible, clean up is diligent. I'm a native. My wife and I walk to the bridge every weekend we're in town and have at least a decade before the Haas built the promenade. It's a beautiful, wonderful area. Let the dogs alone. (I must add I'm appalled at how "extensive" your study is because it indicates how expensive it must have been). Tom Mitchell

Correspondence 302 **Project:** 11759 **Document:** 38106**ID:****Received:** Jan,23,2011 10:50:25**Correspondence** Web Form**Type:****Correspondence:** There is not enough off leash areas already. The San Francisco Bay area is a dog friendly area which should remain that way. That means providing plenty of areas where dogs can roam off leash. If other people don't like dogs they can go to one of the many places they are banned. Its ridiculous to complain about dogs being off leash in a couple of areas when people who don't like dogs have the endless other choices. If I didn't like children i wouldn't go to a playground park. Am I being discriminated against because that park is not for me?

To address the other issue in terms of nature: While I am sensitive to the environmental aspects of the plan realize that humans represent the same (or worse) disruption to wildlife and yet are allowed free roam throughout our national parks. The solution is not an outright dog ban, but to put in rules that punish those who are irresponsible. Don't punish the vast majority who

have good dogs, who clean up after them, and respect the rules.

Correspondence ID: 303 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 11:04:54

Correspondence Type: Web Form

Correspondence: I strongly feel that the issue here is not so much the person who comes out and enjoys the parks with their one leashed dog, perhaps taking fido off for a quick run or ball/frisbee chase. The issue here is almost 100 percent the professional dog walkers who have more then two dogs and at sometimes up to ten that are off leash with no voice control over them. I have one dog and sometimes she does not listen to me so there is NO way that a dog walker has control over a large number of dogs let alone how they would ever know where the dog is littering. How do I know this? I see it everyday as a worker in the Presidio and sometimes even while far away from a trail I or my co-workers step in it. This goes far beyond having these dog walkers buy a pricey permit because they will and then continue to do what their doing. The parks are for all people just not people with dogs. Would this be an issue in Yosemite or Yellowstone park? I don't think so.

Thank you. Jeff Wright

Correspondence ID: 304 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 11:09:25

Correspondence Type: Web Form

Correspondence: As an owner of two dogs, I frequent Ocean Beach with my dogs on a daily basis. I understand that the Snowy Plover protection area needs to be protected, however banning dogs completely from this area is extreme. We keep our dogs on leash and when there are plovers around, we give them a wide clearance when passing. We keep our dogs on leash in this area during the appropriate months. Your Plan A (Map 15-A) seems the most reasonable for Ocean Beach.

Note the third paragraph in this article: http://articles.sfgate.com/2007-06-17/news/17250884_1_dog-hotels-dog-s-life-number-of-dog-licenses

In a town where there are more dogs than children, I think it is important you remember who is using these areas the most. Daily, I see so many dogs on the beach and in fact it is actually unusual to see someone out there *without* a dog at their side. While I know some people let their dogs off leash when they shouldn't, penalizing those of us who follow the rules is not the answer. Banning dogs entirely is simply unacceptable. Enforce the current regulations, don't create new ones that don't allow anyone to be there

at all with their dogs.

Most Sincerely, Corey Head Boomer Tippy

Correspondence ID: 305 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 11:17:26
Correspondence Type: Web Form
Correspondence: To Whom it May Concern:

It's about time! My wife and our four small children have been driven away from one of the most remarkable waterfronts in the world due to a small but arrogant group of dog owners. I love dogs and I own a dog but I don't let her run around without a leash where small children are playing near the water. There are dozens of dog owners who treat Crissey Field and Rodeo Beach as their private dog park and it's not fair. Leash laws and requirements that owners pick up after their dogs are routinely ignored by park rangers.

It's a NATIONAL recreation area. These plans address areas that are not just for neighbors who think the world owes them a scenic dog run. This plan includes MANY areas where dog owners can let their animals loose and that alone is an extraordinary thing for a national recreation area - in almost every other place in the country, dogs are not even allowed.

Please don't let the dog owners continue to bully their way on to beaches whenever and wherever they please. This is NOT about DOGS - it's about the small number of people who own pets that want to do whatever they like vs the vast number of people (including dog owners!) who want to experience these amazing landscapes without stepping in dog sh*t or being afraid for children who are especially vulnerable to uncontrolled dogs.

Owning a dog brings a series of responsibilities just like owning anything else. Please put this plan into place and ENFORCE the regulations so we can all get back to protecting and preserving these amazing places.

Thanks for listening,

Brendan Kelly San Francisco

Correspondence ID: 306 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 11:19:38
Correspondence Type: Web Form
Correspondence: I am a small person, 75 years old, who greatly enjoys GGNRA. The sight of

a large off-leash dog bounding toward me is truly scary. I like dogs and I have owned dogs, but with a strange dog I do not know what to expect and fear being knocked down or worse. Also, as a nature lover, I deeply resent the damage that dogs do to bird and plant habitats. I can see dogs on my city street any day; I go to GGNRA to see species that I cannot see at home. These species have as much right to survive as do domestic pets. I am deeply opposed to off-leash dogs in GGNRA and other public parks.

Correspondence ID: 307 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 11:57:04

Correspondence Type: Web Form

Correspondence: I am concerned and disappointed that the NPS is considering banning off-leash access to dogs and their owners. We are fourth generation Marin residents, my husband works in the presidio and my family makes use of the many facilities and merchants in the area. We are also frequent visitors to the park and beach at Chrissy Field with our dog. In our many visits there I have never seen a dog fight or any conflict between dogs and people or animals. I have always been impressed by how many people use the park in different ways and all manage to get along. It is also one of few areas left where we can all go as a family with the dog off-leash. I recognize that concerns of fragile habitat can be valid, but I believe this concern has also sometimes, been used by the park service locally and historically as a way to remove what the park service might perceive as "undesirables" however, park use should be available to ALL citizens and in many different ways: walking, biking, water recreation and dog use. I think it is possible to continue to protect the snowy plovers and uphold the precedent of off-leash access. I believe that the 1979 Pet Policy should continue to be honored. The other reasons you list for the perceived need for this change is due to "a compliance-based management strategy to institute a range of park responses to non-compliance.." I think you can do this without the extreme and rash measures of banning off-leash access. I favor fines and expulsion of owners that abuse the rights of others. I don't feel that the park service should be abusing the rights of compliant dog owners and tax payers that use the park off-leash and respectfully. Thank you for your consideration regarding this issue.

Correspondence ID: 308 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 12:04:39

Correspondence Type: Web Form

Correspondence: Dear NPS, we support the preferred alternative. The NPS needs to control dogs so small children can enjoy park areas, especially Crissey Field. Also, I have been bitten recently by a dog and want to avoid areas with unleashed

dogs. Thank you and good luck, William Ahern

Correspondence ID: 309 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 13:00:34
Correspondence Type: Web Form
Correspondence: Dogs off leash are a real problem in the GGNRA. I have personally seen dogs digging up wildlife in the GGNRA and harassing birds. I fully support more leash laws or banning dogs from certain areas (or from the whole park) to protect the wildlife. I also support leash laws or banning dogs from certain areas to create dog free space for people who are uncomfortable with dogs to enjoy. There are many parks/open spaces areas for Dogs outside of the GGNRA and the GGNRA could serve as a dog free area to enjoy and preserve nature. Please enforce these laws with tickets. The money from these tickets should go to paying for patrols and also towards park restoration.

Correspondence ID: 310 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 13:08:14
Correspondence Type: Web Form
Correspondence: I have walked a dog in Marin and Crissy Field for the thirty-five years I've lived in Mill Valley. I am very much against closing parts of Crissy Field and Oakwood Valley Trail all of Muir Beach, and any of the other leashed or voice-control dog areas open in the GGNRA. On the Oakwood Valley Trail, which I walk at least four times per week, I have only witnessed one dog fight. The only other dog versus human negative interaction was a story (dog bit human) perpetuated by a ranger. He started this rumor to convince people who use the trail of the validity of closure, the last time GGNRA attempted to close Oakwood Valley Trail to dogs. Most dog owners are responsible for their dogs and pick up after their dogs. What I have noticed, especially in Oakwood Valley, is that after a weekend - when non-locals use the trail - is when dog feces litter is apparent. Another problem in all areas is that some professional dog walkers have more than five dogs in their care. (Not good for the dogs, the people or the environment!) Though not unusual in the human condition, a few irresponsible people create problems for the many. In response, the bureaucracy (in this case the Park Service) responds with punitive rules which do not address the real and specific problems and which do not truly address the multiple use aspect of the GGNRA. I believe there are solutions. They are far less expensive solutions for land management and people management: 1. Require and enforce people to CARRY leashes for their dogs, especially on high use days. Monitor for voice control adequacy. 2. Require and enforce people to clean up after their dogs, especially on high use days. 3. Limit professional dog walkers to three

or four dogs per outing in all areas. 4. Add a fee onto dog licensure to pay for these services.

Finally, I want to note Peter Fimrite's 1/23/11 Chronicle article in which he says that the Park Service is trying to avoid protest from the "dog people" by setting its community meetings as "informational." This is the Park Service's political ploy to avoid confrontation from dog owners (read, NOT a community discussion.) Shameful! Sincerely, Laurie Cohen

Correspondence ID: 311 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 13:19:24
Correspondence Type: Web Form
Correspondence: Bravo on finally giving the parks back to the people. I walk on Crissy Field every day. Children are expected to play in sand where thousands of dogs have pooped and peed. In the summer we do not get rain for 5 or 6 months and it is unhealthy and unsanitary to have kids playing in a dog toilet. We desperately need a section reserved for people who want to use a clean beach without dealing with dried dog urine. As far as the wildlife, most dog owners ignore the nesting plover sites and allow their dogs to run through the nesting areas. The fences have helped somewhat, but rangers could easily earn their salaries if they gave hefty tickets to offenders.

Correspondence ID: 312 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 13:27:35
Correspondence Type: Web Form
Correspondence: We, my wife and I, are in strong favor of keeping things as they are insofar as letting dogs and their owners enjoy some portions of the Bay Area National Parks.

We see no reason to further restrict dogs from our parks. Human beings with their noise and intrusive natures create considerably more havoc on the wild life living in these parks than dogs and some of the wild animals such as coyotes and foxes and badgers and raccoons also cause more havoc on the bird life in our parks than dogs. Drawing the line to exclude dogs from these parks appears unreasonable and unnecessarily restrictive and politically driven to satisfy the extreme elements in the conservation movement.

Thank you for your consideration of our point of view,

Jeff & Bonnie Felix

Correspondence 313 **Project:** 11759 **Document:** 38106

ID:**Received:** Jan,23,2011 13:31:20**Correspondence** Web Form**Type:****Correspondence:** LEAVE THE DOG POLICY ALONE.

I'm not a dog owner, but there is NOTHING wrong with the current situation. STOP TRYING TO RUIN SOMETHING THAT'S WORKING JUST FINE.

Correspondence ID: 314 **Project:** 11759 **Document:** 38106**ID:****Received:** Jan,23,2011 13:33:02**Correspondence** Web Form**Type:****Correspondence:** Please do not keep us and our dogs from enjoying and exercising in Crissy Field, Ocean Beach and Fort Funston. I am 76 years old and I am so thankful that I am motivated to take my Lab mix to run and play in all the areas under consideration for restrictions.

This is not only about dog exercise and enjoyment; it is also about the joy it gives us to frolic, run, walk, throw balls and engage with so many wonderful dog owners who we have gotten to know over the years.

The pleasure this brings to me is immeasurable.

I am careful that my dog does not infringe on delicate areas of the parks.

Correspondence ID: 315 **Project:** 11759 **Document:** 38106**ID:****Received:** Jan,23,2011 13:43:05**Correspondence** Web Form**Type:****Correspondence:** Please reconsider the plan for Muir Beach. It makes no sense to allow dogs on-leash in the parking lot, then ban them from the beach. Why would I take my dog to Muir Beach to walk him around the parking lot on-leash? I take my dog to Muir Beach so he can run and play ball, he's a lab retriever. A dog playing on the beach should be allowed off-leash and under voice control like mine is. If you want to have a leash law in the parking lot, or on the trail to the beach, or anywhere near the fresh water marsh-like area, I can see that, but banning dogs from the beach for off-leash makes no sense. Your own report shows little to no impact on the area one way or the other. Please stop trying to regulate what does not need regulating.

Correspondence ID: 316 **Project:** 11759 **Document:** 38106**ID:**

Received: Jan,23,2011 14:28:38
Correspondence Web Form
Type:
Correspondence: Dear GGNRA-

I have been walking daily at Crissy Field with my dog/dogs for the last 13 years. We live near the Presidio, which we love, and we also enjoy outings to Stinson Beach, Muir Beach, and Fort Funstun with our 2 labs and our 5 yr old son. I have never once taken for granted the beauty of our surroundings and the delicate eco-system it sustains. I feel so lucky to enjoy these areas with my dogs off leash. Dogs and humans and other species can co-exist with education and ticketing if dog waste is not picked up. No one likes to see dog poop left anywhere. I feel like it is not the dog walkers who leave it behind. All of the dog walkers I know are very responsible in controlling their dogs and picking up after their dogs. If there was a large fine attached to anyone leaving dog waste behind then hopefully people will think twice in not picking up.

Each morning at Crissy it is the dog people walking the beach and picking up trash left from other people. I believe there is far more damage from the human species on the GGRNA areas than the dogs. On any given day at Crissy there are many dogs enjoying what they crave and what they need, excercise off leash, and socialization. This definitely makes for happy dogs living in this wonderful city. I also love the fact that I can take my son to Crissy Field on a warm beach day along with our dogs. I truly do not know what they would do if they could not swim in the bay each day. They are so happy and so lucky to live where they are allowed to excercise off leash in a natural environment. Please do not limit to an extreme as it appears in the draft, the off leash areas. We need this and our dogs need this. Thank you.

Sincerely,

Carolyn Geubelle

Correspondence ID: 317 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 14:51:10
Correspondence Web Form
Type:

Correspondence: I am writing to express my support for new regulations of off-leash dogs and dog walking businesses in the Golden Gate National Recreation Area. As a frequent walker in the Marin Headlands, Crissy Field, Muir Beach, Mt. Tam and Stinson Beach, my safety and enjoyment of the Park is frequently disrupted by numerous encounters with off-leash dogs. I am also concerned by the destruction of Park resources and wildlife by these large volumes of dogs.

On a regular basis I observe the following:

Off-leash dogs running in fenced off habitat restoration areas. Off-leash dogs running on and defecating on playing fields trails and beaches. Off-leash dogs flushing birds from underbrush and grassy areas. Off-leash dogs rolling and bathing in the fenced off wildlife habitat areas and streams and lagoons (especially painful for a birder to see!) Off-leash dogs chasing joggers Off-leash dogs running at, jumping on and barking at people in the Park Areas where heavy usage by dogs has destroyed vegetation Large quantities of uncollected dog feces

I recognize that many dog owners are responsible and show appropriate respect and consideration for other park users and park resources. However, for dogwalkers looking after 8 or more dogs (which I see regularly), it becomes physically impossible for even the most responsible person to adequately supervise their dogs. Unfortunately, many seem to be unconcerned with the impact their business is having on others and on park resources. Further, in some areas of the parks, even responsible dog walking is incompatible with the Park's mission of preserving habitat and wildlife and with the park visitors who are seeking a quiet place to view wildlife.

Given the mission of the Parks system to protect resources and provide a place for visitors to experience natural lands and wildlife, I support OPTION D as the best alternative. However, recognizing the GGNRA is fairly unique in its proximity to large urban areas, OPTION C of balanced use (hopefully combined with vigorous enforcement) would be an acceptable alternative.

Many thanks for your consideration and ongoing stewardship of one of the Bay Area's most beloved resources.

Correspondence ID: 318 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 15:02:08

Correspondence Type: Web Form

Correspondence: Please restrict dogs. When a place has "gone to the dogs" it means it has gone to ruin. Don't let this happen. Dog owners have such gall; they act like it's a Constitutional right to own a dog. What a demanding group of people dog lovers are. Their dog comes first and to heck with everything else. That's their attitude.

The vast majority of dog owners do not pick up their dog's turds. And they think their dog is sooo wonderful that it can't possibly disturb others,or

disturb wildlife.

They think dogs have a right to run free. I say, if they don't have a big enough yard for their dog, then they shouldn't own this species of pet. Or get a treadmill for it. Or walk it on a LEASH. This off-leash demand is nonsense and gall.

One final comment: dogs are an eyesore. A bunch of domestic dogs running around is UGLY.

Thank you.

Correspondence ID: 319 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 15:38:12

Correspondence Type: Web Form

Correspondence: Thank you for this opportunity to comment on the GGNRA Draft Dog Management Plan. We appreciate the park spokesman's acknowledgement of the need to "balance the needs of a hugh variety of users while also protecting natural resources."

We are in our 60's and have enjoyed walking/hiking all of our lives. Yet, there are increasingly limited areas where we can walk due to unleashed dogs that are not controlled well by the humans who brought them to the park areas. (I.e., this is not an anti-dog stance, but a realistic appraisal of increasingly unsafe situations caused by humans who do not take adequate responsibility for their dogs.) This is a liability issue as well as a health & safety issue. If the GGNRA does not get increasing complaints about injuries from dogs, it is because persons (esp., seniors such as ourselves) have avoided areas where we would otherwise have wished to walk, but can no longer do so because of threats against our health & safety. Some may say that it is only a few humans who do not walk/exercise their dogs safely & responsibly, but one dog running & jumping upon us viciously (nearly biting us on the neck) is enough to require us to return home and avoid that area in the future. That was not an isolated incident, and in fact happen even though we always walk away from any areas where there are dogs off-leash. Even when we see a dog on-leash, we usually walk off of a trail in order to give the dog full use of the trail and to avoid any conflict. We even thank the human beings for having their dog on a leash (while we are giving them the "right-of-way"). I.e., we are courteous & responsible ourselves, but find that increasingly that is not enough to prevent problems with dogs &/or their humans.

Once a plan is in effect, please have adequate signs to indicate the limitations & locations of either "leash only" or "no dog" areas, as well as

contact information to report incidents. We have experienced humans who say that it is OK for their dogs to be unleashed, because they have seen other dogs unleashed, or because "he doesn't bite" or "he is a quiet dog" etc., only to see that dog become agitated when around increasing numbers of strangers, whether human or canine. On the other hand, we have experienced courteous dog-walkers who apologized when their dogs ran into us, and who have accepted our courteous reference to signs about dogs needing to be leashed, etc. For those responsible humans, sufficient numbers of signs would be helpful & informative; for the irresponsible humans, the signs will be helpful for other humans who wish to report incidents to the GGNRA administration.

Thank you.

Correspondence ID: 320 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 16:10:19
Correspondence Type: Web Form
Correspondence: I strongly oppose NPS reduction of off-leash dog areas in the Park. I regret that the NPS is attempting to limit public hearings and to squelch public response. The long and detailed document produced by NPS is an attempt by overpaid, third-rate NPS administrators to obfuscate the issue.

Correspondence ID: 321 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 16:21:47
Correspondence Type: Web Form
Correspondence: To Whom It May Concern:

As a professional dog walker/trainer/and dog owner, I am very concerned about the proposed plan to close off these areas of the GGNRA to off leash dogs. I have walked my dogs at Fort Funston and Crissy Field for 10 years! I have seen my share of unfortunate incidents and encounters but overall think that it runs pretty smoothly on a daily basis. I agree with the fact that as professionals we need to be licensed and regulated. Although I think that 8 off leash dog per licensed professional is a little more reasonable, I am comfortable with the 6 dog limit. I feel it is imperative that we be able to use Fort Funston in the way that we are now. It is a huge open space and that makes it more manageable and safe for walking a pack of dogs. Why can't we as professionals pay a fee to use the park? That way the funds can be used to maintain the trails better, etc. I also feel that is a great way to "weed" out other dog walkers who aren't "professionals" and are irresponsible. Most of us take our careers seriously and count on it as our only source of income. I also would like to comment on the dog run idea at Funston. The reason I

don't take my dogs to enclosed dog runs is because the heightened level of dog fight risk when in an enclosed area. I for see this being a HUGE issue at Fort Funston; not to mention the risk of dog fights rising tremendously there. I agree that we all need to responsible pet owners and pick up after our dogs and control them when off leash. That is why I feel permitting is imperative. Please don't take away this precious area for giving dogs what they need; true off leash areas to run and do what dogs do! Without these areas, we will be forced to push into city parks making them extremely over crowded and rise of incidence. Thank you for considering my opinion.

Correspondence ID: 322 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 16:49:47

Correspondence Type: Web Form

Correspondence: As a nature lover, mother of a 4 months of son, and dog owner I'm often torn by my desire to balance the needs of all the creatures that love this city. I know there are people who are afraid of off leash dogs and nature that needs to be conserved. However, I'm concerned that if we loose the proposed off leash areas, we will create some unintended issues. Dogs without exercise are more likely to be anxious and possibly aggressive. Personally, I would be MUCH less likely to take my family to these locations if I wasn't able to allow my dog off leash and I fear we would all enjoy the outdoors much less. I adopted my dog specifically with the dream of spending weekend days outdoors with her, going for runs and generally living a healthy life. That has all come true but it will be a significant challenge and disruption to loose these spaces.

I'm also a social worker working with abused children. I work long hours and therefore have hired a caring and wonderful dog walker. She takes my pup to Fort Funston everyday. She takes good care of the dogs and of the park area. If my dog lost this as a daily routine, my life and my dog's life would be really challenging.

There are so many parks are beautiful spaces in SF and most of them are for people and children. These spaces are so essential for the health of our dogs. In my case, when my dog is happy, I'm happy!

Correspondence ID: 323 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 17:15:00

Correspondence Type: Web Form

Correspondence: San Francisco is known as a dog friendly city. The vast majority of dog owners cultivate a safe and sanitary environment by taking this responsibility seriously. We clean up after our dogs, leash dangerous dogs

and train their dogs to be obedient. It is a delight to walk the parks of San Francisco and experience the wonderful community of dog owners and dogs. Off leash allows dogs to run in a game of fetch and to play with other dogs getting that much needed exercise. It is good for the dogs, their owners and the community. Don't take this away from us.

Correspondence ID: 324 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 17:46:17

Correspondence Type: Web Form

Correspondence: I am writing to express my opinion about proposed changes to dog management in the GGNRA. I am a dog owner living in San Francisco and I jog with my dog every weekend and most holiday mornings on Baker Beach (within walking distance of my home), and I sometimes walk my dog at Land's End, Crissy Field or Ocean Beach. I allow my dog to play off-leash at Baker Beach, Ocean Beach, and in the big field at Crissy Field. I feel that it is important for dogs to be able to run freely under the appropriate conditions (i.e. under voice control and where they are not disturbing wildlife). At the same time, I consider myself an environmentalist and I respect the views of those people who do not enjoy dogs, and I control my dog accordingly, as well as pick up his feces. In my experience, most other dog owners are respectful and do the same. I see far more trash from humans that is unsightly and dangerous for wildlife on the beach and in Crissy Field than I do dog feces.

Although dogs are not allowed off-leash in most national parks, I feel that the GGNRA is unusual in that it is within a large metropolitan area and so its use should be balanced to accomodate the needs of local residents and visitors. It will never be a real wilderness area on the scale of other national parks. While I support preserving habitat for wild animals where possible, including excluding dogs from those sensitive areas, I hope that you will also designate certain areas on the beach in particular where dogs will be allowed to run free under voice control.

Correspondence ID: 325 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear people; I do not live near your park, but I will comment on the new governmental rules you are attempting to implament. Years ago, prior to MAMKIND living in the wilderness, all and I repeat "ALL" animals lived there. Not until mankind came in was there a problem. Our Creator has a balance for all wildlifew and they are well taken care of by our Creator, whom is the best as people destroy what is best. If you would know that

people steal the home for the animals instead of animals stealing the homes of human beings we all could enjoy what our Founding Fathers set this Country up for that our Creator let us have. I thank you for taking this into consideration and understand the birds are also protected by our Creator, not that much by mankind. I love nature, dogs, horses, deer, birds, and all animals, but not in a pen, or confined as you are looking to do by your lease law. Forget the law, and let the dog owners control there running are for exercise. Please STOP the idiotic governmental control which is dumb. My e-mail address is in this for you to keep me up-dated. I get my news on the Yahoo site of my computer. I am 61 years of age and I always watch the wildlife as well as the animals (some two legged animals also) I even place a 6'3" two legged man eaten dog back into jail. You can look it up on AMW.COM and read it, his name is Hornick, Scott Alan. This is the truth. Stop playing God.

Correspondence ID: 326 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 18:07:25
Correspondence Type: Web Form
Correspondence: my dog and the public benefit hugely from being able to run free in the golden gate national recreation area. not only does it make my dog happier, healthier, and a better apartment dog. but it has many socialization benefits for other dogs and dog owners. further it benefits the public. i have had countless elderly, children and handicap persons enjoy the theraputic benefits of petting my dog and receiving his loving attention. san francisco as a whole benefits as a city for having caring pet owners and pets in public space.

Correspondence ID: 327 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 18:44:04
Correspondence Type: Web Form
Correspondence: I welcome the opportunity to visit a dog-free park. Please do what you can to ensure that those of us who do not appreciate the mess and hassle that dogs and their owners bring to public places have a voice in these discussions.

Correspondence ID: 328 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 19:56:04
Correspondence Type: Web Form
Correspondence: I have reviewed all the options for Fort Funston and Ocean Beach, the two areas where I regularly walk my two dogs. I vehemently support Option A,

which allows me to keep my pets under voice control, and strongly protest all other options.

While my elderly dog no longer needs to run, and can walk sedately on leash, my younger dog can simply not be adequately exercised on leash. Part of the joy of living in such a beautiful location is that I can go to lovely coastal areas to exercise my pets and me. All the alternate proposals make that impossible. I simply don't have time to go one place to exercise my dogs, and then pile them in the car and go to Ocean Beach or Fort Funston.

GGNRA is not a wilderness like Yellowstone or Yosemite, but is adjacent to a dense urban population. It is not appropriate to treat it as if it were wilderness. I am a backpacker, and would not dream of taking my dogs somewhere inappropriate, but leashing all dogs even on paved trails, as if they can do some environmental damage to asphalt or concrete, is just silly! In fact, it is so clearly silly, that it makes the whole plan suspect, as if it were written primarily to accommodate those who fear or dislike dogs.

This is not meeting the needs of dogs and dog owners even a little bit, much less halfway.

Correspondence ID: 329 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 20:12:47

Correspondence Type: Web Form

Correspondence: Blanketly closing these parks to dogs especially such staples as Chrissy Field and Fort Funston would have a devastating effect on this very dog-friendly and well dog-populated city. It's been my experience over the 7+ years that I have lived here and visited these areas, that citizens who visit these parks with their dogs do so with safety, consideration of others in the community and respect for the surrounding environment and plantlife as major priorities.

It is a fact that there are somewhere between 100,000-200,000 dogs living within the city of San Francisco. And it is also a fact that the dogs that do not receive enough exercise, enough socialization with other people and other dogs are much more prone to aggressive behavior. Therefore depriving dog owners in the city of places where they can respectfully and safely give their dogs the exercise and socialization they need not only diminishes the quality of life for these animals, but it also potentially creates an environment where dog bites, dog fighting and dog attacks are more likely to occur.

As a resident of the city of San Francisco and a dog owner myself, I **STRONGLY URGE** you to work with the dog-advocate community to

develop a more workable solution than the one that is currently being proposed.

Thank you, Lisa Sussman

Correspondence ID: 330 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 20:16:30
Correspondence Type: Web Form
Correspondence: Frank Dean,

As a regular visitor to Fort Funston I appose to the proposal changing the dog laws of the GGNRA and absolutely support alternative A. I understand the concern for environmental protection of our planet but disagree that the current laws would do as much environmental damage as proposed. I very rarely see dogs in the protected areas of Fort Funston. Dog owners I have seen have respect for the protected areas of the park. As for wildlife, I have never seen a dog chase or harass any native wild life on the beach at Fort Funston (or Ocean Beach). In regards to visitors, I have many times seen dogs and people without dogs enjoying the parks together. I spoke once to visitors from out of state that commented how lucky we were to have such a wonderful place for our dogs. I have seen small children and dogs of all sizes enjoying the same beach without any problems. Dog owners do pick up their dog waste and there are group days for any waste that may have been missed. Finally, people have ruined areas of the park way more than dogs by defacing the Forts with graffiti.

I am personally very thankful that I have a place where my dog can run off leach. I am very respectful for the parks, as are other dog owners. Based on my experience with dogs and the parks I do not agree with the reasons for changing the law. There are so few places left for responsible dog owners to walk their dogs off leach. Please do not take away places where dogs can run free and enjoy our National parks just like everyone else.

Thank you for time

Correspondence ID: 331 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 20:41:49
Correspondence Type: Web Form
Correspondence: There are already too few options for dog owners to exercise their dogs and enjoy the outdoors with their dogs. Part of the reason we moved to Marin was to enjoy the outdoors with our dog. It's not fair to punish those who are responsible dog owners because of a few irresponsible people. Not all dogs

do well in dog parks so being able to exercise them at the beaches and trails is key for dog owners. Please reconsider the proposed laws.

Tiffany DeFrance

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| Correspondence ID: | 332 | Project: 11759 | Document: 38106 |
| Received: | Jan,23,2011 20:44:50 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | i have been using crissy field for the last two years with my dog. I have always been respectful and so have the members of the community that I see at crissy field. The best thing to do is license the dogs for off-leash use and fine those that are not license. | | |

| | | | |
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| Correspondence ID: | 333 | Project: 11759 | Document: 38106 |
| Received: | Jan,23,2011 20:56:56 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I have read only the Executive Summary. In all of that I did not see any mention of what remains in places where dogs roam free or are walked on-leash or off. The main problem I see with dogs consists the remainder of their feces and the urine they spray. People and especially children can come in contact with these materials and get very ill. Where are regulations regard cleaning up after animals in public areas? There should be restraints on the presence of dogs on all government properties, especially beaches, playgrounds, picnic areas and other places where people may be sitting on the ground or playing in the dirt and/or sand. I so often see people walking their dogs and then letting them off of leashes to go and find a place to deficate. Dog feces carries as much bacteria and illness-bearing material as human waste. We don't let people deficate anywhere they wish so why should we let dogs? Do your regulations address animal waste at all? You don't mention cats anywhere. Cats waste, in addition to the danger listed above, carries something that can cause miscarriage in pregnant women. Where are regulations regarding cats? My concern about waste from cats and dogs adds to my fear of dogs. I like dogs, but when I see dogs and packs of dogs running together, perhaps towards me, I become anxious. I believe that domestic animals should be kept on leash or tether unless on their owner's fenced property. Leash regrlations are a must in public areas especially. We must maintain the pristine forests, beaches, trails, etc. We do sometimes see wild animal "scat" while hiking, but I just can't see that we must put up with cat and dog feces in our National Parks and National Recreation areas. I have a golden pass which allows me to enter national parks for free because I am a senior citizen. I often visit such areas. I have visited the Golden Gate National Recreation Area on every occasion when | | |

traveling to San Francisco. I will continue to do so and hope that I will find regulations in place and enforced.

Correspondence ID: 334 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 21:02:54
Correspondence Type: Web Form
Correspondence: To: The GGNRA I have been living in San Francisco as a dog owner for 26 years. Along with the great weather, great food (although I do wish that more restaurants would accommodate well-behaved dogs) and beautiful surroundings, I have spent some of my most memorable days in the city walking my dog at Chrissy Field. I have a small terrier and he thrills at the sand and surf and Labradors fetching sticks from the ocean. We meet friends that we only see at the beach and the dogs play together without causing problems for families picnicing, Seniors walking or runners enjoying the water's edge. The people that bring their dogs to Chrissy Field are a conscientious group and I have never seen a dog owner that did not pick up poop. In fact, many times I have witnessed a dog owner offer a pickup bag to a possible offender with a suggestion that they clean up after their dog in the future. For the number of dogs that enjoy Chrissy Field one would think that dog litter would be a problem, but I can walk for an hour without seeing a pile of dog poop. The dog walkers that I meet are very protective of the space and do all that they can to keep it clean for everyone. I am very aware of the need to preserve nesting space for the Snowy Plover. I am a conservationist and work at The California Academy of Science. My dog and I have respected the nesting area near the pier and never go there off leash. Dogs and their owners need space to run and enjoy the coastline. Many of the reasons given for imposing leash laws, such as dog attacks to beachgoers and dog walkers not being responsible for picking up, are not realistic and do not reflect the what goes on at Chrissy Field each day. San Francisco is known as a city that welcomes 'Life' in many ways and having the space to let a dog run free should not be something one needs to forfeit when living here. Saint Francis, the Patron Saint of Animals will be proud when this debate has ended and dogs are able to enjoy the public spaces in our city. Thank you for the opportunity to address this issue. Jane Matsui

Correspondence ID: 335 **Project:** 11759 **Document:** 38106
Received: Jan,23,2011 21:25:51
Correspondence Type: Web Form
Correspondence: Dear Federal Government, while I am a law abiding citizen - I vote, pay taxes, am fairly active - I seem to be completely out of step with your current plans. And to my way of thinking, your current plans are out of way of thinking of most Californians.

I guess I'm ultimately unclear why the Federal government can create pet rules that are different than the cities or counties where these parks are housed.

If San Francisco, or Marin is happy with supervised dogs running free, why do you get to set different more restrictive rules? and as citizens, that ultimately fund these parks, how do we get to vote?

I understand the process to work with local rules and legislature, but am baffled to learn the federal government can create rules that do not reflect local desires without having any process (beyond an email comment box) for locals to get involved.

we pay you - why don't we get to play a role in the rules that will ultimately govern our lives?

Put me down as one highly disappointed Californian pet owner. I wish there was a way to vote on your policies. I can't even see a way to vote you out of power, or to vote less funding for your controlling rules.

- Cate Baril

Correspondence ID: 336 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 21:40:31

Correspondence Type: Web Form

Correspondence: PLEASE keep ALL of Fort Funston as "off leash"! This is such a unique and wonderful area for dogs and their owners, restricting off-leash access would be such a disappointment.

Thank you for taking my comments into consideration.

Correspondence ID: 337 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 22:52:26

Correspondence Type: Web Form

Correspondence: I have reviewed the maps and comments for preferred alternatives for all of the San Francisco GGNRA units. I believe that the preferred alternatives represent an equitable balance between those who prefer to bring dogs and those who don't. They also fulfill the mandate of the NPS to protect and preserve our wildlife and natural resources. I also believe that the preferred alternatives are realistic considering the limited amount of resources that can be used to enforce the adopted policy.

As a San Franciscan native, I personally have been dismayed by the ever-increasing use of both GGNRA lands as well as City parks by off lease dogs. I find it more and more difficult to have a "no-dog" experience within the City natural areas. When I was a child and young adult, I remember enjoying hiking through Fort Funston. Now I avoid it, as it is overrun with dogs. I think the NPS has done a fantastic job in designing Crissy Field. However, I can say in the days when it was mostly large asphalt air fields, at least I could take a peaceful walk on the beach without getting overrun by dogs. At this point, I am loath to bring my 5 year old daughter to East Beach, considering the density of big, uncontrolled dogs. Often one hears that since areas like Fort Funston are mostly used by dog-walkers, it should remain that way. However, this was not true years ago. I believe that the presence of so many dogs in areas like that have driven away those who find the experience greatly degraded.

Although City parks are not part of this discussion, the fact that leash laws are routinely ignored in City parks makes having non-dog areas in the GGNRA even more important. For instance, even though Pine-Lake park has a large, attractive and conveniently located off-leash area, the rest of the park also has off-leash dogs running all over the place. I have yet to see any enforcement of leash laws in San Francisco parks.

Many of those who wish for a better balance than what exists now are members of families with children. I would guess that those who are most likely to show up to make comments at public events do not have child-care responsibilities. So, despite the fact that public meetings tend to be skewed towards those wanting more dog access, please remember that many, many people are counting on the NPS to bring everything back to a more equitable balance.

Correspondence ID: 338 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 23:21:05

Correspondence Type: Web Form

Correspondence: I support the plan and wish NPS well in its attempt to protect GGNRA.

Dogs need to be controlled to protect wildlife and visitors. Voice control means many things to many people and the bottom line is that voice control is ineffective in crucial situations. If a dog is to be allowed on NPS property it must be on a leash six feet or shorter with the other end of the leash held by a person at all times -- even service dogs. A loose dog accompanied by an owner is difficult to restrain when the dog is provoked, and a dog that has no obvious person connected is even more difficult to restrain or capture.

What will the NPS policy be if a dog is found harassing wildlife -- with or without its owner?

Good luck.

Miles Standish

Correspondence ID: 339 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 23:39:47

Correspondence Type: Web Form

Correspondence: Dear GGNRA and folks reviewing the dog management plan: As a resident of San Francisco and a dog owner, it is shocking to me that we would be looking at passing a law that would restrict dogs from frequenting certain sites and running free in designated locations. Dogs are part of our households and have become part of our families Does it really make sense to make it even harder for residents of San Francisco to allow their dogs to get exercise? We pay enough taxes here to be able to enjoy the beautiful beaches and woods of SF with our canine companions.

That said, if this is not feasible, I would propose a fee and registration for dogs to run offleash and frequent certain areas. This could allow regulation of which dogs are allowed to be offleash and would bring revenue to the city to care for any dog related expenses.

Best regards. Mom to an eight month old human baby and 2 year old canine mutt

Correspondence ID: 340 **Project:** 11759 **Document:** 38106

Received: Jan,23,2011 23:48:50

Correspondence Type: Web Form

Correspondence: I support your Dog Management Plan. I agree that it better fits the "natural, historic, scenic, and recreational values" of the Park's mission better than the anarchic and anti-social behavior I see today in the GGNRA. I would only argue against allowing the so-called ROLA access to national park space. While many owners and the animals are responsible and can be trust with voice-only controls on their dogs, other owners who see these off-leash animals will believe that there are no on-leash rules in effect.

Correspondence ID: 341 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 00:00:08

Correspondence Type: Web Form

Type:

Correspondence: There are many flaws in this plan, but the most egregious is the idea to completely eliminate dogs from Ocean Beach south of the very northern end. Thousands of people walk their dogs responsibly on this 3 mile long beach, and it is ludicrous to propose that this wonderful place to walk your dog should suddenly become closed to dogs.

Many people like myself live in the Outer Sunset because of the proximity to Ocean Beach. One reason we love the beach is because it is a beautiful natural environment for dog walking. We respectfully abide by the leash regulations, and are some of the most frequent visitors to the beach. Who else is at the beach when there is terrible fog, wind and rain? I'll tell you: no one - which makes it an amazing escape.

The beach is basically my front yard, and the idea that I cannot responsibly walk my dog on leash on the dunes or sand is asinine. I pick up every piece of poop. I also pick up other trash, particularly glass, to protect all beach goers, both human and canine. My presence has an unequivocally positive effect on Ocean Beach, without doing harm to any bird or other person, so why do you seek to ban my canine friend and I?

The current regulations for OB are working fine, and the status quo is far preferable to the inane proposal from the NPS. And don't forget: San Francisco can take Ocean Beach back if you hinder the city's residents from their recreation. I promise you thousands of SF citizens who will take the issue to city hall if you try to implement these proposed rules.

Thank you for your consideration.

-Jake L.

Correspondence ID: 342 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 01:15:30

Correspondence Type: Web Form

Correspondence: I find the proposed plan to be over-harsh and restrictive in an already overly restrictive plan where dogs are regulated to just 1% of our parks. The comments that some people don't like dogs is ridiculous in light of the fact that non-dog lovers have ****99%**** of the rest of the parks to enjoy. Why take the tiny bit that dog owners have left? We have so little as it is. And many of these areas i.e. Fort Funston are not and won't be nice areas (i.e. sewage runoff - ew)

With such a high population of dogs (and their owners) in ratio to children in SF, why squeeze them into an even smaller area? This will only further

the dog-related issues by compressing all dogs into a small area. Small, confined dog play areas are known for increased rates of dog/dog aggression. Dogs need large areas to play. I rely on these open expanses to give my dog room to run AND avoid less socialized or pushy dogs. More dogs in a smaller area will not allow for this. Have you ever considered that a number of the problems you are trying to mitigate is due to the limited space (considering the dog population) that dogs have now to run in?

With regards to the confusion and people who don't like dogs, limiting the dog-friendly areas is not going to solve the issue. The problem is lack of clear signage. I can't tell you how many times I have gone out on adventures with my dog, researched which trails I can go on, on/off-leash and tried to memorize the maps online and then get there and can't figure it out so I do my best from my memory. If trails and areas were well-signed and obvious, then dogs could be and do what they are supposed to. And non-dog fans could easily avoid those areas. But you guys make it too confusing by not-providing the information when and where it is needed.

For example, there is a point at Fort Funston on the beach where it becomes state park and dogs are not allowed. Horse riders stay to this area because of the threatening dog incidents to their horses. But the owners don't know where the line is. And horse riders get hurt being chased by dogs whose owner don't understand where the line is. Being both a horse rider on this beach and a dog owner who walks my dog at Fort Funston, I know but I am the exception.

I can't imagine that the confusion is going to change with the new policy. Because you are not going to clearly sign...I didn't see that in the document. So dog owners are going to be in violation even more often for bigger \$\$\$ revenues for you from fines AND make a bigger case for how "irresponsible" dog owners are. SF dog owners in general are quite responsible but I often have trouble figuring out where I can and cannot go. So sometimes I just take the lead of what I see other dog owners doing.

I ask that you please reconsider the extreme reduction that you are proposing. If you are having increased dog/non-dog people incidents, then sign better - make it clear so we can all avoid each other. But don't take away the meager 1% that we have. We just need a beach or two to run on and a few decent trails where we can loop around. And if we need to be on leash for a portion of those trails, its okay but don't eliminate the ability to do decent hikes with our dogs entirely. It's one of the best things about nature and having a dog is hiking...far more than running about in one tiny portion of a beach.

Received: Jan,24,2011 01:38:15

Correspondence Web Form

Type:

Correspondence: As a former Bay Area resident I was dismayed to hear of plans to ban dogs from Muir Beach. I now live in Switzerland where it is understood that dogs are part of a family and they are welcomed everywhere except grocery stores. It's really an outrage to deprive dogs and their owners from taking part in the majestic beauty and restorative properties of the Muir Beach area. What will be next? I sincerely hope that this matter is given greater consideration for all dog lovers and owners in the Bay Area.

Correspondence ID: 344 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 10:13:10

Correspondence Web Form

Type:

Correspondence: Crissy Fields and Fort Funston must be kept for the enjoyment of off-leash dogs, their owners, and everyone else! With the dwindling space left for dogs to run free (as it is in their nature to do),we can't lose these beloved spot. Limiting their use is awful.

Correspondence ID: 345 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 11:43:09

Correspondence Web Form

Type:

Correspondence: As a past and future dog owner and freelance photographer I see the need for areas in which dogs and their owners feel free to run and get exercise. I also see the impact that dogs have on wild life both on and off leash. My opinion is this: It is necessary to keep dogs off the headlands completely leash or no leash. The impact to the natural environment, raptors, bobcats and coyotes and the small animals they feed on would forever change the attraction the Headlands bring as a natural feature. I had a number of photo shoots on the Marin headlands ruined due to dog owners having their pets in a "No Pets" area scare away all wildlife right in front of my lens. There are thousands of acres and hundreds of miles in the Bay Area designated as runs for dogs. Please keep dogs out of the Headlands. Owners will have to take the responsibility for owning their dog and caring for them in a way that does not force sharing the burden of pet ownership on the rest of those who would like to enjoy the Headlands in its natural state. The state in which it was reserved for.

Correspondence ID: 346 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 12:10:23

Correspondence Web Form

Type:

Correspondence: My family (including my dog) would be devastated to see the reduction of dog-friendly spaces as proposed in this plan.

To be fair, however, if that is the most sensitive natural habitat in need of special care, then so it should be.

But then help us find a way to establish an equivalent amount of space for permanent, fenced and significant off-leash dog parks in San Francisco and our surrounding areas.

Just as certain locations are designated for the protection of local flora and fauna, it only makes sense to set aside a number of large tracts dedicated to the health and well-being of our area's lively and loved, leashed and off-leash, canine population -- and the humans who want to be with them.

Thank you for your consideration.

Correspondence ID: 347 **Project:** 11759 **Document:** 38106

Received:

Jan,24,2011 12:49:52

Correspondence Type:

Web Form

Correspondence:

To Whom It May Concern:

I am unclear how my dog is more of an issue than the coyotes. She is on a leash or under voice control, being watched to make sure she stays on the trail, and we are picking up her waste. Further, she is socialized and obedient and certainly poses less of a risk to other people enjoying the area than a coyote would.

I am unclear why domesticated dogs are being banned in an area where wild dogs are part of the ecosystem, and I read the sections of the report which I thought might address that. I did not read the entire 2,400 page document, of course.

More regulations are only going to make things harder for the people who follow the rules, and the people who follow the rules have dogs that are far less dangerous to the environment and the other people enjoying the GGNRA than the coyotes. The people whose dogs are a problem now are just going to find places to run their dogs where they don't think they'll get "caught", and that would almost certainly be more destructive than what they're currently doing.

I cannot imagine why I, or any other dog owner, would go for a hike and enjoy the GGNRA without bringing my dog. If I do that, I will have to go

for another long walk when I get home for my dog's wellbeing. Why would I go on a long walk and not bring her with me? If I can't take my dog on a hike, then there's not much reason for me to hike. I cannot be the only person who feels that way.

I hope the public outcry surrounding these changes will make a difference. I understand that some of these changes may be necessary, but I cannot imagine that all of them actually are.

Correspondence ID: 348 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 13:23:58

Correspondence Type: Web Form

Correspondence: I am very disappointed and appalled by the proposed regulations regarding dogs in the GGNRA Draft Dog Management Plan. You are punishing ALL dog owners rather than the few irresponsible owners. Dogs need room to roam and to freely run off-leash. Dogs who get enough exercise tend to be well-behaved and happy. The ability for dogs to run on trails and on the beach is one of the best things about Marin. I have lived in Marin since 1986 and have never had an issue with an off-leash dog who is out of control or hurting wildlife. In addition, as a board member of bird research environmental organization, I am very concerned about bird populations and the protection of ecosystems. Nevertheless, I believe that dogs need freedom too. Please stop this Dog Management Plan and allow us to continue to enjoy the beauty of the GGNRA with our dogs off-leash.

Correspondence ID: 349 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 13:27:22

Correspondence Type: Web Form

Correspondence: I am a senior with a large dog. The joy I experience walking on a beach with my dog free to jump in the surf and dig in the sand is beyond description. I often drive to Point Isabel in the East Bay to enjoy another off leash experience. The East Bay and San Francisco both have very large unfenced dog beaches. Marin does not have this.

A wonderful compromise would be to set aside a large beach with extending dunes and walks similar to Point Isabel or Fort, I think it is Funston, in SF where dogs are allowed to be off leash. Both of those areas are a delight. Dogs are usually well behaved. The areas are large enough to allow exercise for owner and dog.

My dog does not like dog parks. Actually they scare her. It's unnatural to have so many dogs together in a small space with nothing to do but interact

there. Some dogs begin to bully. An open beach walk has wonderful smells to explore. Owners and dogs have a destination and purpose; we're on a walk. Dogs are generally courteous, happy and with their owner on an adventure. This experience is much more successful for everyone.

I walk my dog twice a day. A beach walk is a special walk for both of us, once or twice a month. I would love to have this experience close to home. If you close beaches to dogs I will also be deprived of this joy. I do not have time to take a third extra walk without my dog.

Hope you will consider my suggestion. Thank you, Corinne

Correspondence ID: 350 **Project:** 11759 **Document:** 38106
Received: Jan,24,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Question: I apologize for not reading the entire 2400 page document but I hope someone at the GGNRA may be able to send me the data regarding the number and type of complaints/arrests re dog problems in the GGNRA. As dog owner, I often walk my dog in the areas under study and have never witnessed any problems except park police warning and ticketing dogs just for being off lead, not because they were being a nuisance or danger. I would like assurance that the GGNRA is not pursuing the extensive limitations they propose for a non-existent problem. Thanks you

Correspondence ID: 351 **Project:** 11759 **Document:** 38106
Received: Jan,24,2011 13:46:49
Correspondence Type: Web Form
Correspondence: Dogs already must be leashed in (or are completely banned from) the vast majority of local parkland, but the already scarce off-leash areas keep dwindling. Last year, we lost most of McLaren Park to a planned disc golf course. If this proposal goes through, the few off-leash areas left are bound to become over- crowded and unusable.

About 40% of US households own dog(s). This is a huge portion of our community that deserves the already miniscule number off-leash places available to take care of their dog properly. Dog owners of San Francisco are especially responsible and educated about managing their dog. I am in these parks for several hours every day, and I see owners in control of their dogs.

My dog needs exercise that he cannot get on leash. My dog runs 10-30 times the distance than I am able to run. He also needs to play with other dogs to

socialize and greet other dogs naturally, which requires being off leash. It would be impractical to have him on a leash.

On another note, dog owners are motivated to exercise with their dog, which improves the health of the owner and creates a higher quality of life for the owner as well as the dog.

LET 40% OF OUR RESPONSIBLE TAX PAYING COMMUNITY HAVE THE FEW THREADS OF SPACE LEFT TO EXERCISE AND ENJOY. THERE IS AN ENORMOUS AMOUNT OF SPACE LEFT OVER.

Correspondence ID: 352 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 14:01:07

Correspondence Type: Web Form

Correspondence: I fully support and encourage the directors to accept the dog management plan. I support this plan for two reasons: 1. Protection of birdlife and habitat 2. Protection of recreational beaches for enjoyment by children and adults.

For the thirty two years that I have resided in Marin County, I and my family have enjoyed the beaches and recreational areas of GGNRA. Over the three decades dogs have increased their presence on beaches and trails. Dog owners do not observe rules or common decency about allowing their animals to defecate and urinate all over beaches, in the waters, and on the sand dunes and trails. It is no longer possible to walk barefoot on the beach without risking a very unpleasant experience.

In my observation, the majority of dog owners also do not respect leash laws in place to protect bird and animal life. Not just the common gull, but also sea birds, herons, and egrets are chased, frightened, and if they don't get away, mauled by dogs. Owners have been consistently disrespectful about the behavior of their dogs.

Law and regulation is a last resort when common respect and decency is not observed in the natural resource areas that we all share. Unfortunately dog owners do not pick up feces, nor do they attend to their dogs; on the contrary many feel that the animals are entitled to roam free, kill and maim, deposit their excrement, as well as threaten humans with their barking and aggressive behavior. This attitude and behavior will be apparent as the process goes forward in hearings.

Yesterday I took a beautiful walk on North Beach at Pt Reyes Seashore. It was a magnificent winter day. Dogs were numerous on the beach and I personally witnessed several dogs running unattended defecating in the sand and water and urinating all over the driftwood that we all use to sit on. Many

large dogs ran by me, barking and being intimidating.

Two months ago at Abbott's Lagoon, I witnessed dogs running free, chasing the tiny shorebirds, barking and disturbing the peace of this pristine area. The owners were angry with me and personally insulting when I pointed out the rules concerning dogs at the Lagoon.

It is time that regulation and enforcement is needed to restore balance to the use of our pristine resources and habitat. Thank you for the opportunity to submit this comment. Good luck to you.

Correspondence ID: 353 **Project:** 11759 **Document:** 38106
Received: Jan,24,2011 14:03:27
Correspondence Type: Web Form
Correspondence: it would be a huge shame to restrict dogs from the coastal trail off of muir beach. this is an ideal spot for dogs, and i've never seen an owner not clean up for his/her dog. i would never come here if i couldn't bring my dog. he delights children on the trail. there has been no strong reason given for the exclusion of dogs. please do not restrict dogs from the only dog friendly trail for miles.

Correspondence ID: 354 **Project:** 11759 **Document:** 38106
Received: Jan,24,2011 14:40:16
Correspondence Type: Web Form
Correspondence: As a San Francisco resident and dog owner who regularly uses portions of the GGNRA, both with and without my dog, I wish to comment on certain aspects of the Draft Dog Management Plan. My comments will be limited to the two areas I use most, FORT FUNSTON and OCEAN BEACH.

Preliminarily, I support any restriction on dogs which has as its primary focus the preservation of sensitive wildlife habitat, whether located in either of these two areas or elsewhere within GGNRA boundaries. In my view dog owners should be willing to prohibit dogs from interfering with any other species that may be nesting or otherwise present on park lands.

OCEAN BEACH: I object to any effort to restrict off-leash access to any part of Ocean Beach from the Cliff House south as far as Ulloa Street, at least, unless a specific area has been identified as sensitive wildlife habitat. As far as I am aware, no such area exists. I can conceive of no rational reason to limit access along this stretch of beach solely to on-leash dogs. There appear to be no environmental bases for such a limitation, and there

certainly are no fragile resources of any cultural significance in this area.

In all of my experience spending time at the beach, whether with or without my dog, I have never witnessed any canine/human altercation which would suggest that there is any inordinate risk to human safety posed by maintaining the present off-leash policy. Of course, all dogs present on the beach should be under voice control and there is no question that dog owners must remain responsible for picking up after their dogs. Based upon my experiences and observations at Ocean Beach, at regular intervals over a period of years, I can conceive of no legitimate need or interest to restrict dog access in any way except in the case of specific areas of sensitive wildlife habitat.

FORT FUNSTON: For many of the same reasons I object to any effort to restrict off-leash dog access to any portion of Fort Funston that is not already off limits (i.e., fenced areas of sensitive habitat). The bases for my objection are the same as those set forth with respect to Ocean Beach. In addition, however, I wish to observe that, in contrast to Ocean Beach, which is widely used by dog owners and non-dog owners alike, Fort Funston's users are over 95% dog owners and it is the "go-to" place for dog owners seeking to exercise their pets off-leash in an extensive natural setting. Indeed, better than nine out of ten vehicles pulling into the Fort Funston parking lot unload one or more dogs in addition to people (and the other 5% are hang gliders who congregate in a specific location). As stated above, I support efforts to restrict all canine and human access to areas of Fort Funston that provide important wildlife habitat, but this can be achieved without requiring leash use. Depriving dog owners of a resource they have historically valued so thoroughly and so highly is an abuse of the planning process.

Each of these areas is without significant cultural resources and possess few, if any, sensitive habitats that are not already restricted. Human/canine altercations are, in my extensive experience of both areas, not a problem. Indeed, there are more dogs on any given day at Fort Funston than there are people, and I have never witnessed any notable dog vs. dog issues, let alone incidents involving humans and dogs. The fact that some people may harbor an irrational aversion to, or even fear of, dogs is in my opinion no basis at all, let alone a sufficient basis, for any on-leash restriction contemplated by any alternative set forth in the Draft Plan.

In summary, I object to the imposition of leash requirements at either Ocean Beach or Fort Funston except in limited specific areas known to be sensitive wildlife habitat. Thank you for considering my views.

Received: Jan,24,2011 14:43:00

Correspondence Web Form

Type:

Correspondence: Dogs and dog walkers are out of control in GGNRA. They don't plan to abide by the reasonable new leash restrictions. There are a couple of ways I would suggest dealing with this. 1. Tickets for off leash activity in an on-leash area and tickets for dogs in a no dog area for \$500 2. If someone gets three tickets, their dog should be taken away and given to the spca. 3. If the person wants to contest the ticket, any other people involved in the incident (person who reported the dog an dog owner) should be allowed to testify.

Correspondence ID: 356 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 14:43:09

Correspondence Web Form

Type:

Correspondence: Please do not take away any hikes that currently allow dogs. If anything, we need to add more! Hiking with one's dog is a great way for individuals to get physical activity while also exercising their dogs. With so many beautiful places in the Bay Area, it would be a real shame to loose the opportunity to enjoy a beautiful hike with one's dog. I personally always want to take my dog with me when I go for a hike and only choose hiking trails that are dog-friendly. With the obesity epidemic on the rise in this nation, we should not limit the abiity for individuals to hike with their dogs. Without dog-friendly hiking trails, some people will resort to taking their dogs to dog parks for exercise which will not provide the dog owner with any exercise. Also, dogs need to walk as a pack for their mental well being (it's what they would do in nature). If dogs are just running around in a dog park, not walking with their pack (owners/family), then they can become agresive and misbehave. Please consider the health of your community and keep the trails dog-friendly!

Correspondence ID: 357 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 16:40:59

Correspondence Web Form

Type:

Correspondence: To whom it may concern:

Thank you for providing the opportunity to comment on the GGNRA Draft Dog Management Plan.

Based upon periodic use and experiences at several of the selected National Park locations, and after review of the referenced draft, I respectfully request continued sensitivity to the needs and concerns of park visitors that

may not care for domesticated pets, particularly dogs.

In my experience as a frequent park user, dogs are an attractive nuisance due to their uncontrolled behavior, and often degrade the natural environment and park amenities due to deposited urine/excrement as well as physical destruction. In addition, dogs create considerable noise pollution which disrupts wildlife and the park experience for other visitors.

As mentioned in the draft report, I strongly support dog exclusions and/or prohibitions to designated parks or areas within parks. I believe these measures are appropriate as the attractive nuisances mentioned above are often acceptable to, and allowed by, the responsible party/the pet owner, without regard to other visitors and park rules.

Again, thank you for the consideration. I hope my comments are helpful. It is my belief that the Dog Management Plan is created and adopted to respect and enhance the enjoyment of both pet and non-pet park visitors for generations to come. If successful, this will provide the best possible experience for all visitors and will provide for the lasting benefit of all public recreation areas.

Correspondence ID: 358 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 16:58:33

Correspondence Type: Web Form

Correspondence: While I do not live in the bay area, I visit often. I have chosen San Francisco as a vacation destination several times specifically because of the many dog friendly locations. Even if I'm just passing through I always stop at Fort Funston for a lovely walk. I have never encountered any problems there.

My dogs are well behaved and under voice control. They do not wander off of designated paths and I am diligent in cleaning up after them. The ability to run loose and interact with other dogs and their owners is integral to their socialization and continued good behavior.

My town is one of the least dog friendly places in California and not a day goes by that it does not negatively impact our lifestyle. I am surprised that the GGNRA is considering such a drastic measure. Please reconsider.

Correspondence ID: 359 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 17:38:28

Correspondence Type: Web Form

Correspondence: As a dog owner in San Francisco I'm concerned that we are not allowing

enough areas to be off-leash dog friendly. Many breeds of dogs do not get their required exercise on leash which often leads to over-anxiety or aggression. It's important that we maintain as much off-leash dog friendly spaces as possible. I am in favor of leaving the restrictions where they are.

Correspondence ID: 360 **Project:** 11759 **Document:** 38106
Received: Jan,24,2011 19:13:19
Correspondence Type: Web Form
Correspondence: Keep dogs out of the GGNRA or at least insist on enforcing the leash laws.

Correspondence ID: 361 **Project:** 11759 **Document:** 38106
Received: Jan,24,2011 19:50:38
Correspondence Type: Web Form
Correspondence: I have read over the proposed changes to the official policy regarding dogs in the GGNRA and there are three units within the proposal I wish to comment on, Stinson Beach, Crissy Field, and Baker Beach, as these are the three areas I use for exercising my dog. Regarding the changes in policy I don't have any strong disagreement with the new rules for Stinson Beach and Crissy Field, they seem to me to be reasonable, especially those concerning Crissy Field, as from my personal experience that is one of the more heavily used units in the GGNRA, and I have found some users, especially bicyclists, not very observant when it comes to looking out for dogs on the paths and the promenade. So it seems that there is a real need to separate dogs for off-leash activity to the Central Beach area and a designated off-leash play area in the central part of the Crissy Field Airfield, as stated in the preferred alternative proposal.

Now, regarding the preferred alternative proposal for the Baker Beach unit, I find the proposed changes to be most unacceptable, and feel that they will basically end the use of this area for recreational use by dog owners and their companion animals. Just so you know, this area is my favorite for taking my dog, who is a five year old female Parson Russell Terrier, weighting about 12lb., as it gives her plenty of space to chase and retrieve a ball, play in the surf, or simply walk unleashed by my side. I usually go there on weekdays, either early mornings or mid-afternoon, when this area is not crowded at all. There is always plenty of parking, it is a wide beach which provides for more then ample room for people who are there with their dogs and those who are not, and the physical location gives one a true break from the urban environment of San Francisco, with it's forested slopes, crashing surf, and magnificent views of the Golden Gate, the bridge, Lands End, and the Marin Headlands.

In reading over the preferred alternative proposal for Baker Beach it seems that dogs will be required to be on-leash in the parking lots and on the trails, which seems just fine to me, as that would provide for their safety when they are in the lots, and in sharing the narrower space on the trails other walkers/hikers. This sounds to me to be both a sound and reasonable policy. But then the proposal goes on to state that dogs will be excluded completely from the beach area starting at the north end of the north parking lot, which means that almost all of the beach area will be off limits to dog owners and their companion animals. In addition, in the beach area south of this point to Lobos Creek, dogs will only be allowed to be on the beach if they are on leash. So, any use of this beach as a place where dogs can exercise by running and playing will be lost, which for my own dog, who is a terrier, is very important for her physical, and I would say, emotional well being.

In addition, I personally prefer to walk my dog, and allow her to play unleashed on the north end of Baker Beach, since this is the part of the beach which usually has far less people than the south end, which is where the proposal wants to restrict dogs. This just doesn't seem to make sense to me if your aim is to provide an area where people who are not comfortable, or who wish not to interact with dogs, can enjoy Baker Beach too. In the five years that I've been taking my dog to Baker Beach I have not witnessed any dogs bothering people on the beach. Yes, there's been the occasional checking out of picnic site on the beach, but dog owners seem to be very good at controlling their dogs in these situations. Also, I've not seen dogs invading the areas set aside for dune/native plant restoration at Baker Beach, which is more than I can say for some human visitors, who I've actually had occasion to point out to that they shouldn't be entering in those areas, even with the posted signs. Dog owners seem to be very good about removing pet waste from the beach, and I've never detected a problem with dog urine either. One last item of concern, that regarding native wildlife, yes, I've seen and had my own dogs chase after shore birds, but the birds are usually in flight before a dog gets any where near them, and once we've passed, they usually land again and resume their search for food along the shoreline. Even the ravens that seem to hang out at Baker Beach handle their contact with dogs with little fuss.

So in closing, it seems that a better way to set policy concerning dogs at Baker Beach would be to require that they be on-leash when in the parking lots and on the surrounding trails, but that on the beach it self things be left as they are, allowing dog owners and their companion animals full beach access, with them allowed to be off-leash and under voice control, as from my own personal experience over the past few years, this seems to be working just fine, and that way dog owners and their companion animals can continue to enjoy the recreational value at Baker Beach. Thank you for allowing me the chance to voice my opinion on this important matter.

Correspondence ID: 362 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 21:26:36

Correspondence Type: Web Form

Correspondence: Dogs impact the environment a lot less than humans. Dogs do not leave bottles and cans, cigarette butts, and other trash scattered throughout the parks. If their people pick up their waste, then it is almost impossible to tell a dog has been there at all. At Fort Funston, people walking their dogs are the majority of park users especially in the winter. Banning them will result in a little used park waiting to be a haven for gangs and homeless people to hang out in.

Correspondence ID: 363 **Project:** 11759 **Document:** 38106

Received: Jan,24,2011 22:53:27

Correspondence Type: Web Form

Correspondence: I think that it's really sad that the few open spaces available for "off-leash" dog walking will be subject to the usual restraints of on leash/voice control. We often take our dog to Ft Funston occasionally to Crissy Field and she has the time of her life. I have noticed that other dog owners are respectful, pickup after their dogs and have never witnessed a dog fight. In fact I would go as far as to say, the canines at Ft Funston are very well behaved! I think its pitiful, that as a tax payer and law abiding citizen we cannot have a few places that we can go to where our dogs can be dogs and enjoy themselves and run/socialize with lots of empty space. There are lots of other public parks where people without dogs or who don't like dogs can go, so why choose Crissy Beach or Ft Funston? Go elsewhere! Dogs rule - leave Ft Funston and the few off-leash parks/beaches as they are.

Correspondence ID: 364 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 00:10:46

Correspondence Type: Web Form

Correspondence: To Whom it May Concern,

I'm sure you are going to read a thousand and one of these letters requesting that you NOT enforce more of an on-leash dog presence within SF's beaches and parks, however it would be unprofessional of me not to comment. I own and operate a small dog walking business in San Francisco. We enjoy walking our dogs within the Presidio (more specifically between Presidio Ave and Arguello Ave.) Chrissy Field/ Beach and Baker Beach. During our average group walks we will have approx. 7 dogs play off-leash. We are very prideful in training our dogs to respond to vocal obedience and recall.

It is our number one goal to have our dogs enjoy the parks and beaches (as much as we do) and it is not fair to make a dog a prisoner of their own leash if they can obey their handler's voice commands. I understand if people are not comfortable around dogs being off-leash, however most dog owners are very respectful and will not let their dog be a nuisance or unruly. What I am most proud of within our city is the fact that San Francisco is one of the most dog-friendly city's in the world. Tourists for example are always so fascinated by how dog's can socialize in an off-leash pack and follow their handler. There is so much to learn about dog's and since this is my profession I have the pleasure to learn more new things about what they can offer and what we can offer them each day. I vote against on-leash dogs (unless they are aggressive and/or unable to respond to a handler's vocal commands) within our parks and beaches and definitely not for more enclosed dog parks (which are at a rarity anyhow as this would just lead to more problems, ie. dog fights, unstimulated dogs, parking problems, and noise). I vote for more education for dog owners to handle their dogs on & off leash. I also respect the views for protecting forests and endangered species, however not at the expense of a friendly and trained dog who wants to enjoy being outside as much as we do. Please don't take away this right for them!

Feel free to share my comments and thoughts within any public forum.

Sincerely, Corey Vitale (& Voice of everydog that I walk and dog w/n SF)
Professional "Off-Leash" Dog Walker

Correspondence ID: 365 **Project:** 11759 **Document:** 38106
Received: Jan,25,2011 09:30:15
Correspondence Type: Web Form
Correspondence: Please allow responsible dog owners to bring their dogs to play at the beach and in an area or specific times in some manner. Most are responsible, but ticket the nuts who don't clean up or bring bad mannered dogs out in public. A huge fine, like \$1,000.00 to pay for the park security and ticket givers. We do not have children and for some of us our pets are our babies. We do not deserve to keep our babies indoors and on cement all the time. They keep us mentally sane and caring for others also. Some go to nursing homes and children centers. Some people with children also should be ticketed for not being responsible parents. It comes down to training before the animal or child is old enough so they will model their parents GOOD behavior. If you do not allow pets to run in some place they will turn mean and aggressive and not be social animals. We could pay to bring our pets and children to a park and have certain times when they are less crowded for dogs perhaps or pay for the children to come to play at the park as those play areas are expensive to build, dogs don't need that much prebuilding.

Thank you, a. darling

Correspondence ID: 366 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 10:31:21

Correspondence Type: Web Form

Correspondence: I have been a dog owner and dog walker in San Francisco for 16 years now. There are some parts of this document that I do agree with but much of it I do not agree with for many reasons. I only take 6 to 7 dogs and am very respectful of other people coming up the trails or down the beach who might not like dogs. I always pick up after my dogs and always move to the side of the trail or away from the person coming up the trail that might not like dogs. In addition, I would never let my dogs run wildly through and off the trails after wildlife. I have seen a coyote and have quickly leashed my dogs walking away from his or her area. The coyote was not disturbed in anyway.

I feel like that dog walkers and dog owners can coexist in many of these park areas and beaches with no problem but yes should have some restrcitions like not bothering other people. I believe the majority of people/dog owners are very respectful and responsible and there are a few that are not but majority are very responsible.

I also think that what the GGNRA is missing is the fact that the Presidio, Crissy Fields, Fort Funston, Marin Headlands etc are located in a city and urban area. I do not see dogs scaring off the animals but people. I remember way back when they banned dogs to an area of Crissy Fields for the birds to return and I have yet to see a bird since so many kids and people run up and down that beach. I think what the GGNRA is missing is the fact that this is a National Park but it is in an urban area not like Yosemite. It is crazy to think that wild life will suddenly return because of getting rid of dog walking. I believe it is getting rid of people, bikes, motorcycles, streets etc.

I am grateful for the privately owned areas in Marin that allow dogs to go off leash. Matter of fact I have seen over and over a wonderful bob cat that coexists quit nicely with everyone on the trails..dogs, people, bikers etc. Many have seen him and we stay away from him as he does us.

I have a hard time swallowing alot of this document as there are thousands of dogs in the city that need a place to run and have fun with their owners. There are more dog owners in San Francisco and Marin than non dog owners and these people need a place to take their dogs to have fun and enjoy things as do the dogs but yes responsibly.

I have kids who love going to the beach with our dogs to play in the sand and run around with our family dogs. Please do not take that way from my

kids who love all animals. I love all animals and have been raised to respect wild life as a dog owner and dog walker that is exactly what I do.

I think sure clean up some of the dog walkers that take 12 dogs or gather with other dog walkers so there are 16 dogs in one area...hate that but don't punish the rest of us who are responsible and respectful who only take well behaved dogs and respect others using the trails. There is a way to clean up dog walking but if you limit number of dogs per dog walker that will help but do not take away places to go or use. You will see a difference if you start with limiting dogs to each person but to do all of this at once is ridiculous and punishes all of us which is not fair.

Thank you for your time in reading this.

Lisa Gates

ps...my husband is a Phleger (as in Phleger acres) and his family are huge environmentalist hence the donation of pheleger acres to POST and then GGNRA. They are also huge dog lovers and would be very upset by this document. They are big believers (past Phlegers and present) in dogs coexisting nicely with the environment. My husband whose mother was Anne Phleger Gates (the bench at Crissy fields) and nephew of Atherton Phleger was very upset by this document and not happy at all.

Correspondence ID: 367 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 10:43:47

Correspondence Type: Web Form

Correspondence: Dear National Parks Service,

I am writing to comment on the EIS for dogs in GGNRA. I grew up in San Francisco, and return often. I have had many bad experiences with dogs in GGNRA, and I hope that you will have the courage to adopt a plan that protects the resources and visitors of GGNRA, despite the vocal minority of special interests (i.e., dog owners) who appear to be exerting pressure on you. (I saw the article in the SF Chronicle on 1/23/11.)

I went to your website and reviewed the EIS, and have the following comments:

1) You should ban dogs from all places where there are conflicts with natural resources. You should not fold/compromise by allowing dogs where natural resources may be impacted.

2) I do not like encountering dogs when i visit my national parks, including

GGNRA. I don't like the barking, the poop, the chasing of wildlife, the digging, and especially having any dogs off leash. I don't like dogs running toward me, with owners yelling "FIDO COME," followed by "DON'T WORRY HE'S FRIENDLY." Usually, the dog doesn't obey, and the dog runs right up to strangers, either veering off at the last moment, or (worse) jumping on strangers, shoving it's nose in strangers' crotches, and/or licking or putting it's wet nose on strangers' hands, etc. Fortunately, most dogs don't bite. But sometimes they do. My sister was bitten by one such dog, without any provocation, and the owner said simply (without any apology): "If i hadn't witnessed it myself, i never would have believed it." The bottom line is that dog owners are in DENIAL that others do not love their dogs, and do not want their dog running toward them, even if it is friendly. I don't like "friendly" dogs running toward me, licking or putting their wet noses on me, and/or sniffing my crotch, and we should not have to be subjected to such objectionable dog behavior in our national parks, including GGNRA.

3) I would prefer that dogs be banned entirely from GGNRA.

4) If a complete ban is not possible, i support Alternative D, to limit dogs to protect resources and protect visitors to the greatest extent that the Park Service is able.

5) If NPS lacks the political will to adopt Alternative D, then the "preferred alternative" would at least be a good improvement over the current situation, where dogs run wild and un-leashed throughout much of GGNRA.

The current situation is unacceptable to me, and i hope you will adopt (and enforce!!) a strong plan that at the very least keeps all dogs on leashes in GGNRA.

Thank you for considering my views.

Sarah Chisholm Tahoe City, CA

Correspondence ID: 368 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 10:52:40

Correspondence Type: Web Form

Correspondence: Hi there, my name is Janine Marty. I live in WI, however, my brother is stationed in CA. I go to visit him, and his dog, often with my two dogs. We really enjoy catching up and taking walks together in the parks. Having the dogs remain off leash makes it so that we all can enjoy our time. I just love looking at the beautiful landscape and seeing the dogs enjoy their time as well. We are VERY in control of our dogs. They come immediately when are called and will remain on an off leash heal, if asked. All dogs have been

to obedience school and none are of a "bully" mix. We love our dogs and they are a part of our family. Please keep the parks as an off leash dog area.

Correspondence ID: 369 **Project:** 11759 **Document:** 38106
Received: Jan,25,2011 12:00:11
Correspondence Type: Web Form
Correspondence: I visit GGNRA once a year or so--my parents live in California--and have on occasion had my dog there. A few quick comments:

1. It's not clear from the language I read whether single dogs without permits will be allowed off leash in the ROLA.
2. It's not clear from what I read whether visitors would be allowed to walk their dogs to Tennessee Beach.
3. I understand that no-dog zones would protect fish, frogs and birds, but I'm less clear on how they would protect butterflies. This probably reflects my own biological ignorance, though.

Incidentally, I've been going to GGNRA off and on since 1987 and it's absolutely one of my favorite places in the world.

Correspondence ID: 370 **Project:** 11759 **Document:** 38106
Received: Jan,25,2011 14:00:39
Correspondence Type: Web Form
Correspondence: As a responsible tax payer, registered voter and registered dog owner, I am appalled by this proposed plan. Currently only 1% of all the National Golden Gate Recreational Area allows dog access and now to propose limiting that by 90% is an outrageous. I have heard your terribly misleading propaganda on the radio by your ignorant or purposely misleading representatives concerning the need to protect the general public from unwanted dog interaction. For those who do not want to interact with dogs, they have 99% of the rest of the NGGRA to enjoy. Many people who don't have the ability to keep dogs themselves, frequent these areas to interact. My dear friend who is in a wheelchair goes out to Fort Funston, just to see the dogs, and get out into nature. Many of the dogs will just sit next to her and let her pet them, this bring such great happiness. I plan to fight this until we get these draconian and malevolent changes repealed with the staff the proposed them.

Correspondence ID: 371 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 14:37:33

Correspondence Web Form

Type:

Correspondence: I believe that people come before plants when it comes to recreation. There are already too many restrictions on the use of the trails around Muir Beach. Now to take away the beach is not fair or right. I love seeing the dogs running free on the beach. I don't even have a dog and yet I feel that man's best friend should be allowed be with his friend to enjoy the outdoors, both beach and trail.

Correspondence ID: 372 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 14:56:57

Correspondence Web Form

Type:

Correspondence: What we need are more off leash priviledges for our dogs, not less. Thank you for your time - Barbara

Correspondence ID: 373 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 15:36:34

Correspondence Web Form

Type:

Correspondence: We are frequent users of Crissy Fields, Fort Funston & SF Ocean Beach.

Currently there are limited off leash options in San Francisco. The proposals are huge reductions and specifcally for the under utilized beaches at Fort Funston and Crissy Fields. Did the elaborate survey reflect actual daily users timelines? Mon-Fri? Sat? Sun? Foggy days? Windy days? Special events? There's very low usage Mon-Fri.

My two off leash dogs are well behaved, and respectful. I often pick up trash. (plastic & glass bottles, cigarette butts, food & container wrappters) The human enviromental damage impact outweighs the dogs.

The proposal limits the current practices and activities. Accessibility restriction would limit our ability to breathe, run and dream. Dream, the Haas Foundation core value and gift intent for Crissy Fields.

Please please, please, reconsider and revise the proposal.

Regards, Shirley and my dogs Buster and Moo Moo

Correspondence ID: 374 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 15:49:35

Correspondence Web Form

Type:

Correspondence: Hello,

Thanks for the good work.

I just glanced at the proposal (maps) and the few places like Alta trail. Barbara and I are laughing at "Voice Control". It is either on leash or off leash. Voice control is good in dog shows and for Lassie who is perfect. Unless you have full time dog rangers (we like our police state), the dog walkers can shout dog names while all dogs are trampling nature and harassing people and leashed dogs. These people are clueless and go out with several different dog breads (I have seen some with at least 10 dogs), that they can barely control. Many of them are petite women on their cell half paying attention. Dogs are excited protective and I know the bite of a German Sheppard... dogs are dogs and will act intuitively, are protective and do what dogs do... hunt for these yummy smells. My 12.5 years old Jax is great but he is only a dog... we have a few unstable people out there.

Few years back on some other trail, I could see one dog off trail happy hunting. The owner was pissed at me saying that we are under "Voice Control" area. My dog has never been off leash and the happy guy is fine. I make it and effort to be alone with Jax on these wonderful trails. I have been doing this since he was a puppy. We live in a very selfish and stupid society. So much entitlement and aggressive behavior. I have been told to leave Jax off leash like it was a revelation... They are spoiling it for the rest.

Very few nice people keep dog on leash... all these years running on trails I have seen dogs mostly off leash. I do remember the few people that are polite. I have to respect nature and the people that are afraid of dogs, trying to walk on these trails. We are not alone in the Universe.

I vote for no "Voice Control" and for people to take some courses in good manners and temper management. Good luck.

Have fun...

Rolando

Correspondence ID: 375 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 19:34:59

Correspondence Type: Web Form

Correspondence: Please reconsider the condensation or elimination of any off-leash dog areas. You must be aware of the high volume of usage. Where would you

intend that activity to migrate to? Without the ability to run off a dogs' pent up energy they become less than ideal canine citizens. To take away this critical function would only result in a cascade into a downward spiral with negative effects on many various levels of the Bay area: unhappy dogs and unhappy owners PLUS you realize this impacts the livelihood of hundreds of people who walk dogs for their living. Your justifications are not worthwhile when viewed in context with the detrimental effects this plan would have

Correspondence ID: 376 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 20:57:32

Correspondence Type: Web Form

Correspondence: The reason why San Francisco is so amazing, is that this city (and surrounding areas) allow responsible dog owners a place to bring their friendly dogs. We are respectful, courteous, and enjoy these parks and beaches as much as those without dogs. There is no sensible reason as to why we would not be allowed to continue having access to these specified areas. Please note, there are already many areas that are "off-limit" to off-leash dogs, so those who do not want to be around dogs have the opportunity to enjoy the parks as much as we do.

Please do not take away these few select areas that we deem precious. The dogs need areas to run free and tire themselves out...that is why they can live in apartment buildings without incident.

Regards, Lori

Correspondence ID: 377 **Project:** 11759 **Document:** 38106

Received: Jan,25,2011 21:40:36

Correspondence Type: Web Form

Correspondence: Gentle(wo)men: I would like to advocate for as wide as possible area for responsible off lease dog walking. I am old person who finds that my health and my dog's health improves when we can hike together but at our own speeds - not tethered to each other. I am fully supportive of an off-leash licensing program which could be run by animal control. Off leash licenses could be given to responsible dog owners. Responsible dog owners do the following: 1)license their dogs. 2) Have their dogs take all the required shots. 3)Have their dogs complete a certified (could be by animal control) obedience program. 4)Spay their dogs. 5) Dog owners could be required to carry liability insurance for their dogs. 7) Of course responsible dog owners pick up their dog waste. 6) Dog owners would have to pay a fee to NPS for the privelege of walking dogs off leash. Those who have the license to walk

off leash would have to carry proof of such licensing at all times. I think this would reward responsible dog owners. Too often we are always punished and restricted because of the actions of irresponsible dog owners. I agree that not ALL areas are for dogs. I do not actually see how dogs damage cultural resources. What can a dog do to a fort? Erosion does more than the dogs can ever do. Is there really some documentation about dog damage to cultural resources? You really do not say how the dogs damage such things. Also, I really think that people do way more damage to the environment than dogs. Dogs do not throw garbage and plastic litter all over the planet. As to dogs making more work for park personell: I personally have never seen a dog rescue. There have been plenty of people rescues, however. Also, I have never, EVER seen a park ranger removing dog waste. I hope you agree that restricting dog walking areas will necessarily make the area that is left to the dogs deteriorate. Any time an area has dense use be it by dogs or people that area is going to suffer. One dog per acre leaves a negligible impact but 100 dogs to an acre is a disaster. If the dogs are all shoved into smaller and smaller areas, that WILL destroy those areas. The San Francisco area is unique and wonderful because it does allow these great places for people to enjoy with their dogs. Please, don't take it away.

Correspondence ID: 378 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 00:06:57

Correspondence Type: Web Form

Correspondence: Why ban dogs from being off-leash. Like most government policy, it comes down to money. So why not require a usage fee for these areas. I'm sure most dog owners would be willing to pay \$15/ dog annually to use these areas. Just think, with 100,000+ registered dogs in SF alone, the revenue that would be generated to fill your pockets.

Correspondence ID: 379 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 01:33:58

Correspondence Type: Web Form

Correspondence: I visited Golden Gate park may years ago. I'd like to thik if i make it back there, dogs will NOT be barking all the time.. and trying to hump me.or catch suirrels etc. Dogs are a nuisance animal; they bother almost every living thing, around them. Most other animals do Not. Rabbits don't try to lick me. Dogs are such dependent, insecure beings. I do not like most dogs. Keep them out of MOST of the park! MAX

It's ok with me if they are given a 5 acre area..with tree buffer zone to muffle barking, to roam free...

Correspondence ID: 380 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 08:54:00
Correspondence Type: Web Form
Correspondence: One of the true joys of dog owners' lives in San Francisco is to romp and play with our pets on the beach at Chrissy Field. Any time of any day, no matter what the weather, dogs and their owners can be seen enjoying the open space without any detriment to wildlife or dogless walkers. It would be a tremendous loss to our community to change this arrangement.

Correspondence ID: 381 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 09:55:41
Correspondence Type: Web Form
Correspondence: I walk my dog off leash at Fort Funston, Crissy Fields and Rodeo Beach. Please so not remove this privilege. For a high energy dog, off leash areas are very important. She is very well behaved, under voice control, and never chases birds. I also have two small children and value them being around off leash dogs. There are already plenty of areas in San Francisco and Marin where dogs are either disallowed or must be on leash.

Correspondence ID: 382 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 09:56:46
Correspondence Type: Web Form
Correspondence: As a dog owner and a park user I am in favor overall of alternative "C" in most cases. I feel that dogs should not be able to free run of park lands due to the possible destruction of natural nesting areas, harming of wildlife and unwanted attention to the public. We have a friendly dog and I have seen the affect of her approaching people while on leash range from joy to fear. I don't want small children or adults who are frightened by dogs to not enjoy the public lands due to free roaming animals. I feel that having the ROLAs would be the best solution for the safety and pleasure of park visitors. Please keep the Parks access open to as many of the two legged and four legged visitors as possible. I heard the discussion of the issue on KQED Forum radio show.

Correspondence ID: 383 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 09:57:24
Correspondence Type: Web Form
Correspondence: As a dog owner, I have always loved San Francisco for it being such an

ideal "dog city," so I am really upset about the potential implications of this plan. Walking my dog off-leash means so much to me and even more to the health and well being of my dog. Most dog owners I know and observe are very respectful of their surroundings and very good at cleaning up after their dogs. I just want to point out that protecting our environment, respecting other people's preferences, and recreational dog-walking are NOT mutually exclusive.

This plan displays an anti-dog bias--if any of the final restrictions are disobeyed, the Park Service has the power to revoke all privileges of either on-leash or off-leash dog walking. This would be devastating to me, to many other dog owners, and to the health and wellness of the dogs of the Bay Area.

Please preserve our ability to walk our dogs at Crissy Field and Ft. Funston off leash!

Correspondence ID: 384 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 09:58:31
Correspondence Type: Web Form
Correspondence: As a dog owner and a park user I am in favor overall of alternative "C" in most cases. I feel that dogs should not be able to have free run of park lands due to the possible destruction of natural nesting areas, harming of wildlife and unwanted attention to the public. We have a friendly dog and I have seen the affect of her approaching people while on leash range from joy to fear. I don't want small children or adults who are frightened by dogs to not enjoy the public lands due to free roaming animals. I feel that having the ROLAs would be the best solution for the safety and pleasure of park visitors. Please keep the Parks access open to as many of the two legged and four legged visitors as possible. I heard the discussion of the issue on KQED Forum radio show.

Correspondence ID: 385 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 10:14:22
Correspondence Type: Web Form
Correspondence: Please keep GGNRA areas off leash dog friendly

Correspondence ID: 386 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 10:51:30
Correspondence Type: Web Form
Correspondence: Please keep Fort Funston off-leash! People come from all over the bay area come to visit this beautiful park with their doggy friends. It is a haven for

dogs and their owners alike. We beg you to keep it off leash!

-Frank & Bali

Correspondence ID: 387 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 11:28:51
Correspondence Type: Web Form
Correspondence: The GGNRA should allow dogs off leash on its lands. As long as the owners/walkers are responsible and voice control the dogs, the impact on wildlife and other recreational users can be minimized.

Correspondence ID: 388 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 11:37:49
Correspondence Type: Web Form
Correspondence: PLEASE, PLEASE let the dogs be !!!!! Dogs and their owners need exercise and should be able to utilize the GGNRA like everyone else. Of course we must clean up after our dogs and make sure they are well trained in order to have this privelege.

Correspondence ID: 389 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 11:37:57
Correspondence Type: Web Form
Correspondence: Off leash dog walking should be allowed in GGNRA areas, as long as walkers can voice control their dogs and their will be consistent enforcement if they can't.

Correspondence ID: 390 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 11:38:04
Correspondence Type: Web Form
Correspondence: I submit that as long as people have their dogs under voice control, there should be no reason that dogs cannot run and play at Crissy Field. We have two dogs, a Dachshund who is under voice control and whom we do not leash. Our English Bulldog is kept on a leash, except once in a while on the beach. She is not under voice control, but follows us faithfully. It is vital for dogs to be able to socialize and act like dogs. Temple Grandin, the animal rights advocate, emphasizes this. In a lifetime of walking at Crissy Field, I have never stepped on a dog's mess, I have never been bothered by another dog. I am delighted to see dogs romping and having fun. I never see dogs

interfering with the bird life. I think it is silly to have a city filled with dog lovers, owners and rescuers who treat their animals so well as to take them to Crissy. It is good for the owners and good for the dogs. Please keep it as it is at Crissy. Peggy Knickerbocker San Francisco native

Correspondence ID: 391 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 11:45:09
Correspondence Type: Web Form
Correspondence: We have a 3 year old lab who loves to run and chase a ball. We find this exercise impossible while attached to a leash. Just as humans need exercise, so do dogs. Please keep responsible dog owners within the rights to run their dogs.

Correspondence ID: 392 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 12:10:27
Correspondence Type: Web Form
Correspondence: Further restricting areas for off-leash dog exercise restricts quality of life for human beings in favor of questionably achievable goals. This is a solution in search of a significant problem.

Correspondence ID: 393 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 12:12:12
Correspondence Type: Web Form
Correspondence: The GGNRA draft dog management plan places undo restrictions on dog owners who must have open spaces such as the GGNRA to freely exercise their dogs. I currently walk my dog at Ft. Funston -- either on the beach or along the trails. As proposed, the trails would be off limits to off-leash dogs. When tides are high, there would be no safe place for leash-free exercise.

I appreciate the need to balance the natural environment and the non-dog uses of the park. However, this can be done without the broad-sweeping restrictions that the proposal calls for. Smaller off-limited or leash-only areas would be more feasible. As proposed, large congregations of dog owners and dog walkers are going to be battling for the small number of open spaces where dogs will be allowed off-leash. This can potential make the situation more dangerous for dogs and dog owners if a great number of dogs are confined to a small space.

I urge the GGNRA to reconsider the proposal and continue to allow dogs to play off-leash in the majority of GGNRA territory.

Correspondence ID: 394 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 12:16:59

Correspondence Type: Web Form

Correspondence: I come from the East Coast where dogs are made to walk on leashes 24/7. It wasn't until I experienced walking with my dog off leash at Fort Funston that I realized how much more territorial and contentious dogs are when leashed. At Fort Funston I delight in the antics of the dogs running and playing together and marvel at the relaxed and joyous attitudes of dogs and owners. Given the sheer numbers of folks and dogs who walk there, I am impressed by the responsibility and care they show for the surrounding environment. Unfortunately, there are a few knuckleheads, and I'm always encouraged when I see them being scolded by more conscientious citizens. Whenever I have visitors from back home, the first place that I take them to is Fort Funston where we can walk, talk, and catch up while giggling at the antics of the various dogs. Afterwards, I am always thanked by my visitor for showing them a local place and activity that they would have missed if they had only chosen touristy types of activities. And each has gone away wishing for an area similar back home. Please don't erase these uniquely San Francisco hot spots.

Correspondence ID: 395 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 12:58:34

Correspondence Type: Web Form

Correspondence: I am very concerned about this proposal.

I live in Marin and value the right to walk my well behaved 5 yr old Airedale off leash in this beautiful landscape ~ without breaking any laws. I clean up after her, she doesn't chase cyclists, runners or children. We enjoy the trails every day and often go to the beach. There is no way she would be as healthy as she is if she was only exercised while on a leash. We occasionally go to dog parks, she can get exercise there..., but it doesn't do much for me.

It would greatly reduce the quality of our lives if we lose the freedom to walk together without the restraints of a leash. Who would take a dog to a beach on leash? That would just be mean if they couldn't run, enjoy the surf, a fetch a ball. Frankly, having my dog on a leash would be more dangerous to cyclists that speed by us if I'm on one side of the trail and she is on the other than if she is off leash. We try not to choose trails with a lot of bikes, especially on weekends. There are a million trails around here that don't allow dogs if a hiker, runner or someone with children would prefer not be

around dogs off leash - they have plenty of options.

Of course people with aggressive, non-responsive dogs off leash is not a good thing for anyone - but you know, I can't remember the last time I experienced one out there...

Please don't implement laws that would reduce our quality of life in this beautiful area. It seems to me things are fine the way they are.

Correspondence ID: 396 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 14:40:09

Correspondence Type: Web Form

Correspondence: I am writing to comment on dogs at Chrissy Field. I have been regularly walking my dog there for 14 years. Before that I did not have a dog and I used to walk there and enjoy seeing the dogs with their owners enjoying the beautiful surroundings. There are doggie refuse bags provided, although I bring my own, and garbage cans available for the used bags.

I have always observed dog owners to be respectful of the environment within the GGNRA, and at Chrissy Field and its beach in particular. I have never stepped in dog poop there, and I have never seen it left lying about either. I do not see dogs and their owners on the beach that is signed as a no-dog beach for the protected birds. It has been my experience that dog-owners are respectful of the closed of native plant restoration areas and careful about wildlife.

Basically, it seems entirely unnecessary to me to restrict dog use at Chrissy Field. There is enough room for everybody. I am a bird lover as well as a dog lover and an environmentalist. I love Chrissy Field and I hope that it can continue to be the recreation area I love so much, inclusive of dogs and their happy owners.

Susan Andrews San Francisco

Correspondence ID: 397 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 16:14:56

Correspondence Type: Web Form

Correspondence: This change in policy will make it impossible for me to continue to use and enjoy the GGNRA. I cannot imagine why the administration of the GGNRA would consider it desirable. If it's implemented, I will never consider a financial donation again.

Correspondence ID: 398 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 16:25:43

Correspondence Type: Web Form

Correspondence: I am so anxious and vexed about the proposed changes. I have never understood how dogs are not part of nature. I have walked many dogs on Crissy Field and Fort Funston daily over 20 years without incident. Truly. It is a blessing. I am unclear why these restrictions are being suggested when we are all uniting in a lovely way. You may not have dogs, yourselves, so you may fail to understand that on-leash dogs cannot develop the social skills necessary to live among people and other dogs. I see dogs in the country where I grew up chained up and barking. So sad! This is what will become of dogs with no where to run. Then people will not adopt them. Then more will be gassed. Dogs - soulful creatures who literally keep so many of us going. I do not love dogs more than the natural life you strive to preserve. I love it all and think things are balanced now. Please do not feed hysteria about animals being dangerous, reckless, etc. In this world we need dogs more than ever before.

Correspondence ID: 399 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 18:16:11

Correspondence Type: Web Form

Correspondence: There are over 100,000 dogs in San Francisco and they need somewhere to go. Fort Funston and the Presidio are wonderful places for dogs to run off leash. This is one reason San Francisco is beautiful and unique. By restricting off leash walking in the GGNRA this will destroy our neighborhood parks. There are just too many dogs and not enough parks already. Off leash dog walking is so valuable to us as San Franciscans.

Catherine and Baron Ziegler

Correspondence ID: 400 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 18:16:13

Correspondence Type: Web Form

Correspondence: I really understand how eroded the dunes are getting from overuse by dogs, but believe the impact on local parks, enclosed dog parks, and any other recreation area that allows dogs will cause much worse damage. Ft. Funston is my dog walk of choice, and I can say in 12 years of going there, I've stepped in dog poo only once - people are extremely considerate because it's where they like to play (and for dog-walkers, it's where they work). It seems like if you regulated the number of dogs allowed to be in one pack by

posting one ranger in the parking lot, you'd cut down on much erosion and spend much less money paying rangers to be cops. Or, have us all pay \$5 to park - that would help your budget immensely, and that money could be put towards much-needed maintenance of trails, paths, and dunes. The off-leash rules in S.F. are one of the things that make this city unique and wonderful. There are fewer dog fights because there is so much space to roam and so much exercise to get. Ft. Funston, especially, would just become a homeless sleeping area without all of us dog walkers. Its use as an army fort was never disputed, so I think its use as a dog park should not be, either, Best,

Celia Sack

Correspondence ID: 401 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 18:45:16
Correspondence Type: Web Form
Correspondence: I applaud your improvement efforts and agree with the proposed leashing of dogs. As a avid photography hobbyist, I have met with many people from Crissy field to Lincoln beach the let their dogs run wild and many leaving feces to step over. Thanks for trying to control a possible problem of people getting bitten and perhaps a future lawsuit by and injured person.

Correspondence ID: 402 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 20:57:20
Correspondence Type: Web Form
Correspondence: I am in total disagreement with the proposed dog maintenance plan. I believe that dogs should be able to run free at Crissy field and Ocean beach and that there should not be any restricitons in these areas.....how foolish can you be?

Correspondence ID: 403 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 21:06:59
Correspondence Type: Web Form
Correspondence: There are already too few dog-friendly areas. The problem isn't dogs or lack of leashes. The problem is bad owners and poor training. I would happily see a "canine good citizen" training requirement, but banning dogs entirely is extreme, fascist, and wrong.

Correspondence ID: 404 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 22:10:26

Correspondence Web Form

Type:

Correspondence: Hello Committee,

I understand there is a discussion about removal of dogs from certain beach preserves. While I am not a dog owner (and never have been), I am a lover of the natural habitat along the beaches and in the bays of northern California.

I did recently visit both Fort Funston and Muir Beach with friends. In both cases, there were many people, dogs, horses, birds, and aquatic animals on my 2-3 mile beach hikes.

I was very impressed by the overall of the beach... I found only the natural ocean dropped kelp, sand dollars and crab shells... lots of birds and some horse manure. I was surprised that the relatively high proportion of dogs to horses didn't cause considerably more dog pollution. Certainly Fort Funston and Muir beach Dog owners managed the waste of their animals with perfect felicity in my several and extensive walks through those parks.

While I cannot say the same of the horse riders/owners on Funston beach, I did not find anything to be offensive or overly unnatural (out of place) on these beaches. In fact, I mentioned my surprise at the conscientiousness of the dog owners to the folks I was hiking with. In only one way did the presence of the dogs and horses on the beach (with their owners) detract from the overall setting... if I had been alone on the beach, my own private paradise would have been special.

However, we all share the open space and I understand that I cannot have my own private beach in California. Residents of these populated areas must be able to share the public resources without hurting them for others. This sharing is required of each and every one of the animals using the beach... wild or tame. Dogs and dog owners, citizens like me who don't have pets, Horse owners and riders, Birds, crabs, and wild animals can and do share the same space with little impact on each other.

I believe that we must be protectors of our planet, location, area, shared space. I believe that the use of these shared spaces needs to be open to all... otherwise, they are not shared spaces by definition. They must be shared with people who live with dogs, cats, horses, birds, and other humans.

If access needs to be regulated to preserve the space, then all of those categories should be eliminated. If dogs must go, then horses, people, domesticated birds, artificial birds (model airplanes, hang gliders, etc) should also be eliminated. However, I think that is unreasonable and unfair. If we eliminate those, we should eliminate the boaters on the water as well...

surfers, Kayaks, boats, ships etc... very impractical and unrealistic. However, there is no reason to single out a particular class or a set of classes of beings... whether they are wild, tame, humans, boats or types of users.

Sharing our environment is important. Protecting our environment is important. Balancing the two may be difficult but in my experience at both of the two beach environments mentioned did not show a problem... balance was maintained and protected by the very people who use and love those areas.

Please do not change the regulations relating to pets on the beaches. I don't believe this is a problem that needs to be fixed.

thank you

Dave Corbin

Correspondence ID: 405 **Project:** 11759 **Document:** 38106
Received: Jan,27,2011 07:44:09
Correspondence Type: Web Form
Correspondence: I'm a dog owner and walker upset about the changes in rules that have been in place for many years and have resulted in very few problems compared to the number of dogs in these areas.

Having small off leash areas connected by on-leash areas that used to be off leash is going to cause an enforcement headache for you because many people are just going to risk a ticket.

If you must restrict dogs, why not have it be time based, instead of area-based? Why not allow dogs in all the areas that have traditionally been allotted to them in the early morning and late afternoon, times not traditionally used by the average beach goer?

Or, alternatively, let us have Fort Funston and save your restrictions for Chrissy Field, which seems to have a much higher ratio of non-dog users than Fort Funston. (I can't speak to Marin as I don't go over there, but perhaps the same principle could be applied).

Thanks, Clare W.

Correspondence ID: 406 **Project:** 11759 **Document:** 38106
Received: Jan,27,2011 09:25:32
Correspondence Type: Web Form

Type:

Correspondence: I walk my dog regularly at Chrissy Field, the Presidio, and in a number of parks in San Francisco. Please do NOT take away our ability to enjoy the beauty of San Francisco, its parks, fields, etc. The residents and guests who enjoy San Francisco all love the ability to go to areas to let the dogs run, play and enjoy it.

Do NOT take away more of our pleasures. This will make San Francisco a less attractive place to live.

Correspondence ID: 407 **Project:** 11759 **Document:** 38106

Received: Jan,27,2011 10:32:08

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

As a person who has lived here their whole life (57 yrs) I have used every inch of our open space with the greatest of pleasure and do so on a daily basis. I have had dogs and horses most of my life and still do. I feel strongly that dogs should be able to enjoy the outdoors unleashed yet thoughtfully and on voice command. I can truly say I have never seen a problem though have heard of some. Instead of punishing the dogs that do behave on the trails why not set up a special license thru the Audubon Society or Humane Society. Dog owners could pay a small fee for a tag after they can prove their dog is under control by voice command. Dogs that can't pass have to be leashed. I respect our open space and want it protected but I don't think taking places away from dogs whos health and well being depend on getting out and having a sense of being free is the right thing to do.

Thank you for your time,

Jennifer

Correspondence ID: 408 **Project:** 11759 **Document:** 38106

Received: Jan,27,2011 11:09:03

Correspondence Type: Web Form

Correspondence: To protect the environment and pedestrians like me, please enforce leash requirements on Ocean Beach as described in the Preferred Alternative or Alternative E. Thank you.

Correspondence ID: 409 **Project:** 11759 **Document:** 38106

Received: Jan,27,2011 13:22:10

Correspondence Web Form

Type:

Correspondence: Please strongly consider Alternative A (No Change). I find all other Alternatives to be extremely restrictive with not enough benefit to the surrounding wildlife and other benefits cited in the documents.

Correspondence ID: 410 **Project:** 11759 **Document:** 38106

Received: Jan,27,2011 13:54:27

Correspondence Type: Web Form

Correspondence: No CHANGE.

Correspondence ID: 411 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,27,2011 14:55:18

Correspondence Type: Web Form

Type:

Correspondence: Every time I have been to Fort Funston, it appears there are more people there with dogs than without. I understand the concerns of those who fear dogs and of those who wish to preserve natural habitat, not withstanding the fact that dogs are a part of our habitat -- especially in San Francisco. Because of the very large population of dogs and dog owners in San Francisco, possibly a satisfactory solution would be to set aside one contiguous mile of beach for dogs. For my purposes and those of my dog, any beach within the city limits of San Francisco would suffice. There is a section near the southern end of the Fort Funston beach that almost nobody visits. Possibly this area could be designated as an off leash dog area.

Correspondence ID: 412 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,27,2011 16:56:24

Correspondence Type: Web Form

Type:

Correspondence: it is so important to allow the dogs to be off leash on Chrissy Field. I am a native San Franciscan and am so sad that there are so few places for dogs to be of leash. Plus Chissy Field is so different now and such a more touristy place with so much more traffic. Chrissy Field seems liek the last place for the residents to go and take the whole family (including dogs). In my opinion, dogs are much more well behaved and less agresive without leashes. Thanks.

Correspondence ID: 413 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,27,2011 19:04:00

Correspondence Type: Web Form

Type:

Correspondence: I would like to see stricter and more leash laws as well as areas where dogs

are not allowed. I would suggest that the majority of the land be dog free. (more than is outline in the EIS) The majority of dog owners I have interacted with have been rude and disobey these laws. Not only do they disobey the laws but they brag about how they get away with disobeying the laws. Dogs not only ruin nature by destroying native and non-native plants but also ruin the peace and tranquility of the park for other visitors. I also recently discovered that people with guide-dogs have not been able to enjoy the park due to attacks on the guide-dogs by other dogs. Because the laws are not enforced, disabled people are forced out of the parks. Please, protect this already discriminated against group. I urge the GGNRA to protect the wildlife and protect the park's visitors from dogs.

Correspondence ID: 414 **Project:** 11759 **Document:** 38106

Received: Jan,27,2011 21:18:20

Correspondence Type: Web Form

Correspondence: As a resident of El Granada since 1989, I have had the privilege and blessing of hiking the Rancho Corral de Tierra hills for 22 years now. In the course of those 22 years, I have always been accompanied by one my dogs: Brigit (in the earlier years) and Boomer, in the later years.

I can't begin to tell you the joy that I and my dogs have experienced in this WIDE open space. What I can tell you though, is that I have had the utmost respect and love for this land and have documented my respect via my photography. I encourage you to take a look at my website and see the images that I have taken along with my dogs. I think you'll begin to understand my passion for not only the land but what it has personally meant for me to have my dog with me while I hiked these trails:

<http://www.dianevarner.com/about.html>
<http://www.dianevarner.com/galleries.html>
<http://www.dianevarner.com/Boomer/index.html>

I consider the hills behind El Granada my backyard. Because of this sense of ownership, I have made it my mission to protect it as much as I possibly can. This protection has started with my dogs, making sure that they do NO HARM or DAMAGE to the wildlife or the environment.

During the many years that I have been hiking Rancho Corral de Tierra, I have seen more damage done by MAN than by dog. For instance, this past December (2010), I stopped a truck that was going up a muddy trail, creating deep tracks in the terrain. They told me that they worked for POST and were doing boundary work for the GGNRA sale. I politely asked them why they couldn't get out and hike rather than drive up and create damage to

the trail??!!

I have also witnessed NUMEROUS hunters on the trails and even called POST in 2009 to let them know that there were men up there with guns. If for nothing else, I would prefer my dogs with me for safety!

Bottom line, I would be heartbroken if I was no longer able to take my dogs with me while hiking these hills. It would change my life and my love for this area that I live in and call HOME.

As a longtime resident of El Granada, I ask you to please consider allowing myself and others the continued enjoyment and enrichment of bringing our dogs along on our hikes in Rancho Corral de Tierra. I urge you to please choose Alternative E rather than a complete ban of dogs.

Thank you VERY much for your time and consideration.

Respectfully yours,

Diane Varner (in memory of Brigit and Boomer)

Correspondence ID: 415 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 00:05:12
Correspondence Type: Web Form
Correspondence: Please keep with alternate A (no change). Any of the changes proposed would restrict dog owners greatly, however the benefits listed are few.

Correspondence ID: 416 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 00:20:38
Correspondence Type: Web Form
Correspondence: Hi there, I just wanted to voice my opinion on the proposed ban for off leash areas. Please let the dogs remain off leash in the areas they already can. It's been my experience that dogs will behave less civil if they confined, much like people.

Please please please don't fence them in.

Sincerely, Diane Gentilini

Correspondence ID: 417 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 02:18:29

Correspondence Web Form

Type:

Correspondence: Unlike most people likely commenting, I've read through the Dog Draft Management Plan, and have quite a few comments, both personal thoughts and practical comments on the proposal. I'll start with personal thoughts...

As a dog owner, it's obviously in my interest to reject the majority of this proposal. Many of the areas proposed for on-leash or outright prohibiting dogs have long been frequented by dog owners and walkers. In the proposal, you claim to attempt to represent the community. However, dog owners ARE part of the community, and those who most frequent many of the parks with tighter restrictions proposed. This seems to be a point you've overlooked. The fact is, dog owners/walkers with dogs in tow are those who visit many GGNRA parks the most; many visit daily. The sense of community at many off-leash areas is very strong - many who visit, with their dogs, daily as their main means of socializing, conversing with friends (other dog owners who they see daily), etc... Tightening restrictions would destroy this sense of community, as people would no longer have familiar areas to meet with old friends as their dogs play. In the proposal, many of the Alternatives are decided with the interest of tourists and other visitors who may visit said parks for an hour of their life, so it just seems ridiculous that they'd be given priority (as part of the "community", which they're not) over individuals visit parks such as Crissy Field, Fort Funston, etc... on a regular basis. I think it's a reasonable statement to say that, in fact, you're proposing these restrictions at the expense of the community (of which dog owners, in a city/region with more dogs than children, are possibly the largest group). Don't even consider the argument that "dogs deserve rights, too", but rather consider the argument that tax-paying members of the community deserve the right to visit parks in the way they enjoy most (in this case, with their dogs).

There have been anecdotal mentions of complaints from picnickers, etc... about dogs "ruining" their experience. This very well may be true, but I assure you it's rare. Most dog owners, myself included, are very responsible and wouldn't allow their dogs to do such a thing. If you personally go to any current off-leash area, you'd be hard-pressed to find even 1 example of dogs disturbing others on an average day. Regardless, this is largely moot; if someone decides to have a picnic in an off-leash dog area, it's equally (if not moreso) their responsibility if it's "ruined", just as it would be my fault if I were to have a picnic in a baseball field and get hit by a baseball. Off-leash dog areas are designated for that purpose, and should be respected as that, just as sports fields, childrens' playgrounds, etc... are designated for their purpose and should be respected as such.

Likewise, most areas of GGNRA already require dogs to be leashed, or prohibit dogs entirely. Those which prohibit dogs include all or most trails

in the following: Muir Woods, Marin Headlands, North Baker Beach (below the Presidio Bluffs), etc... Most other areas require dogs to be leashed, leaving off-leash areas already few. If someone were to want to have a picnic without being disturbed by dogs, they already have many options. Therefore, choosing to picnic at an off-leash area (which are already relatively few) and complaining that dogs are off-leash is no less disrespectful of the community and park policy than dog owners taking their dogs to an area in which people picnic and allowing them off-leash. It may not be illegal, but it is disrespectful, pure and simple.

As a large proponent of wildlife and habitat preservation, I'm also very unnerved by your claims of "sensitive habitat" as rationale for tighter restrictions. Considering the recent development funded by GGNRA, there seems to be a contradiction. Recent developments at Lands End, Mori Point, and several other parks have ripped up vegetation that has been there for generations (no, not native, but plants that were brought by settlers in the 18th and 19th centuries, which wildlife has adapted to since) in exchange for paved walkways and "quaint" planted areas. From personal experience, I can say that raccoons, foxes, etc... that once were plentiful in the area (never in danger from dogs) have all but disappeared since development commenced. Rob Hill has gone from a beautiful eucalyptus patch to what frankly looks like any generic rest area at the side of Highway 80, coyotes in the southern Presidio, near the Arguello gate, are notably distressed and displaced from recent construction, etc... Likewise, as a dog owner, I've personally rescued many birds, during the oil spill and after, which I encountered due to walking my dog on the beach. I've personally rescued cormorants, seagulls, and many others (including other animals, notably frogs) - some I took to rescues, others I personally paid out of my own pocket to get them proper veterinary treatment and eventually release them back exactly where I found them. I have always been an avid lover of wildlife (and animals in general, my love of dogs being an extension of that) and habitat preservation as a whole, so I feel personally offended by this assertion. So, I feel that pitting dogs and habitat against each other is a fallacy; dogs do not destroy habitat... if anything, they're genetically closer to a few species of wildlife in GGNRA than humans are. Likewise, as with the picnic issue, most dog owners are respectful of sensitive habitat... the many shouldn't be punished for the few, especially in respect for the community. If some violate that respect, they should be punished, I wholeheartedly agree (I'll elaborate on that later). However, most don't.

To further elaborate on that, I'd like to directly address the issue of habitat destruction and degradation. Recently, in partnership with Trails Forever and The Presidio Trust, the GGNRA implemented a number of projects which have all but destroyed habitat at Lands End, Mori Point, and many other places. These "restoration" projects have effectively destroyed vegetation that has existed in the area for well over a century, replaced

minor dirt paths with intrusive paved walkways, and displaced or killed any wildlife living in such areas. The area of Lands End closest to Sutro Baths was once dense forest - now, it's a paved walkway and constantly attended garden (note: volunteers may mean well, but wildlife obviously won't settle where people are constantly working). The same is true of many other places. In interest of sensitive habitat, it's deplorable that you'd cater to tourists who will visit for an hour or two of their lives above both wildlife habitat and the community (again, a very large portion of which being dog walkers), just to turn around and use "sensitive habitat" as a justification for tighter restrictions on the community (ie: those who visit regularly). Likewise, people are a far bigger environmental threat than dogs; trash cans and trash, parking lots and cars, paved areas, and encouraging heavier human traffic (ie: more trash, more cars) are undeniably more cumbersome and damaging to wildlife habitat than dogs.

On that note, I'd like to suggest that any truly sensitive habitat (the wildlife area at Crissy Field, etc...) be *completely* off limits to both dogs and humans (bird watchers can still view, via binoculars, from the promenade), in interest of truly preserving limited wildlife habitat. I honestly don't think shorebirds are less disturbed by people than by dogs. Essentially, if a habitat is so sensitive that dogs (under the current control laws) are a threat to that habitat, then so are people. Likewise, in interest of health concerns in other areas about dogs... I'd like to point out those concerns are scientifically unfounded, as I'm sure you're aware. According to the basics of zoonosis, dogs and dog feces pose no health risk to humans, except a small possibility of parasite infection should a dog have a notable infection (unlikely in a developed area with veterinary requirements, etc...) and then only if someone were to eat the feces. So, while it seems a popular complaint, it's moot (and there are already laws requiring clean-up, etc... which I'll elaborate on later).

Another of your "reasons" is to prevent user conflicts. This can be done simply by educating EVERYONE about current parks laws and rules, including respect for current uses and those who frequent certain areas (ie: inform picnickers that dogs are allowed off-leash in certain areas, and if they wish to avoid conflict, they should consider having their picnic at any of other plentiful options that disallow dogs or require they be leashed instead), rather than rewarding those who complain most at the expense of those members of the community who have come to frequent certain parks.

Another issue is that many of your Alternatives effectively seem to be at the expense of dog owners in favor of cyclists (it's noted specifically for the Marin Headlands and Fort Mason). First of all, cyclists are a far bigger threat than dogs - legally defined vehicles that crush any vegetation and animal in their path, at a speed preventing them from being able to quickly avoid any such obstacle. This seems like a clear threat to habit. Secondly,

according to 36 CFR 4.2, National Parks adhere to state traffic laws. According to California law, bicycles are prohibited from pedestrian walkways and pathways and only allowed on designated roadways. Therefore, the proposal is shafting dog walkers at the expense of people who are already breaking current laws, ie: currently illegal activity favored over currently legal activity. As a dog owner, I've very rarely been threatened by other dogs, but my dog and I are routinely put in danger by cyclists. So if public safety is truly an issue, shouldn't cyclists be a concern rather than a group whose rights outweigh that of dog owners?

In the proposal, you mention the cost implementing these restrictions will be approx 1.5 million dollars, with the largest expense being staffing officers to enforce the new laws. That's wonderful - jobs are needed. However, are new restrictions needed for those jobs to be implemented? As it is, there are many laws and regulations already in place to protect habitat, require dog waste clean-up, etc... So why not just hire more officers to enforce those pre-existing rules? Again, as someone personally interested in habitat protection and other environmental concerns, and as the owner of well-behaved dogs who don't violate these rules (and in interest of their safety from aggressive or out of control dogs), I fully support enforcement. However, as I've said, dog owners who allow their dogs to do such are in the minority, and the majority shouldn't be persecuted, especially if you already plan on staffing more people to enforce laws. So, by all means, hire more officers - but enforce currently existing laws when they're violated, which would protect habitat and send a message to irresponsible dog owners without negatively affecting responsible dog owners who are as much a part of the community as joggers, picnickers, etc... (and, in some ways, more a part of the community, or at least a larger segment, and the vast majority at parks such as Crissy Field, Fort Funston, etc...). As it is, options of those who wish to let their dog run, play off leash, and socialize with other dog owners is very limited (certainly a minority of GGNRA space), and further restricting that would only be detrimental to the community.

On another note, I would like to commend the proposal for limiting 3 dogs per person (6 with a permit). As a dog owner, I've at times been annoyed with commercial dog walkers who have more dogs than they control. I've personally had to keep dogs from eating things they shouldn't (note: the vast majority of these "things" have been left by people, not dogs), returning lost dogs to commercial dog walkers who didn't even realize they were missing, etc... I believe this is very much in line with my points above: don't persecute responsible dog owners and walkers who respect laws and habitat, but enforce accountability for the few irresponsible individuals.

Below is a list of alternatives to your "Alternatives" for a few key parks. These were done quickly (and I haven't included other parks that I felt required more debate) but I still feel they're valid and should be considered,

and I will work further on my alternative proposal and send it at a later date. I will also be at both San Francisco meetings to voice my concerns. Thank you!

Muir Beach (proposed Alternative D): Current proposal prohibits dogs from Muir Beach, in interest of the lagoon. Instead, I propose off-leash dog walking on the southern end of the beach, nearest the cliffs (opposite end from the lagoon) and in the area (currently popular with nude sunbathers) below the houses at the far northern end. On leash only on the rest of the beach, and no dogs in the lagoon.

Marin Headlands (proposed Alternative C): The current GGNRA proposal bans dogs from the Coastal Trail, which is the only trail (away from the parking lot/traffic) that currently allows dogs. Instead, dogs should be allowed off-leash on the Coastal Trail, on leash on the other mentioned trails, and off leash on Rodeo Beach. It does not seem logical that the Coastal Trail should remain a bike trail (nebulous under state traffic laws, more detrimental to sensitive habitat than dogs) but disallow dogs.

Fort Mason (proposed Alternative B): The current proposal requires dogs to be leashed, in favor of tourists on rented bicycles. The Great Meadow is a popular area for members of the community to meet and let their dogs run. Therefore, in interest of the community, it should be an off-leash area (at least the southernmost part, away from the main service road). All other specify areas (Laguna Green, grass, service road, housing, etc...) on-leash only. It's illogical to give favor to cyclists, as legally they aren't supposed to be riding on pathways through the Great Meadow, anyway. This would provide a largely on-leash park (since it is multi-use and already very developed) with respect to the prime area currently used for off-leash dog walking. Cyclists should NOT get priority, as they're the ones currently violating the law and, being on legally defined vehicles, a bigger threat.

Crissy Field (proposed Plan C): Under the current proposal, dogs would be banned from East Beach and the Wildlife Protection Area, but Central Beach would remain off-leash. Crissy Field is perhaps the most popular beach in San Francisco for dog owners, and where the dog owner community (as part of the greater community) is most prevalent. Therefore, Central Beach should, in fact, remain off-leash. East Beach shouldn't ban dogs, but instead require they be on-leash east of the stream, off-leash starting west of the stream (the course changes, so this would be a changing boundary). This would allow families with both children and dogs to have the East Beach for picnics, etc... enabling them to have an undisturbed experience while still having their dog with them (on-leash), as it can be a hindrance for families with both children and dogs to find a place safe and accepting of both. However, those who are there with just dogs would, by default, naturally forgo East Beach in favor of Central Beach (few would

want their dog on-leash when an off-leash alternative is just steps away, so even allow leashed dogs on East Beach would provide a relatively dog-less experience for those who choose). The Wildlife Protection area should, in fact, prohibit dogs, but should also prohibit people (in interest of snowy plovers). There is no need for either dogs or people to be in such a sensitive habitat, especially with so much other beach available. Bird watchers can watch from the observation areas along the buildings and promenade. Therefore, the WPA should be designated as the wetlands - off limits to all visitors. Dogs leashed on the promenade is reasonable.

Baker Beach (proposed Alternative D): The current proposal is for dogs leashed on most trails, banned from North Baker Beach. Instead, dogs should be allowed off-leash on the trails and old battery nearest the parking lots, as they aren't sensitive habitat and not too high traffic. On leash in the picnic area and all other trails, as well as North Baker Beach (ie: not banned, but leashed). South Baker Beach, near the stream's run-off, should be designated as off-leash. This provides concern for habitat (leashed) without banning dogs, and encourages dog owners to walk their dogs on the southern portion, which would limit dogs in other areas (again, if the alternative is there, most dog walkers would prefer that area), as well as concern for picnic areas.

Lands End (proposed Alternative B): Proposed on--leash in all areas. Lands End is a disappointment... whereas for many parks, the proposal limits dog access for conservation reason, at Lands End it limits dog access in interest of developing/destroying what was once wildlife habitat. This is against the GGNRA's mission for many parks, which seems a conflict. Ideally, development would cease in favor of maintaining what's left of wildlife area (ie: in favor of conservation). However, since development surely won't cease, I suggest requiring dogs to be on leash in the parking lot and the Coastal Trail starting at Sutro Baths/Sutro Heights Park through the currently developed/paved portion of the Coastal Trail. Where the Coastal Trail becomes a dirt path, dogs should be allowed off-leash, as well as on all other minor trails (down the cliff, toward the beach). This provides a leashed area for the most heavily traveled/tourist-directed area of Lands End, minimizing dog traffic, but still provides dog owners with a large amount of area to walk dogs off-leash (and effectively keep them away from the more tourist-focused area), which I believe would achieve the objective of making the most accessible overlook area more inviting for tourists, but without imposing too much on regular members of the community who enjoy walking with their dog. I personally have rescued a cormorant from Lands End, which I wouldn't have had the chance to do if not for walking my dog there (which wouldn't be as fun if not off-leash, and therefore wouldn't visit).

Ocean Beach (proposed Alternative C): The current proposal requires dogs

on leash throughout all of Ocean Beach, except south of Sloat where they're banned. Instead, I'd suggest North Ocean Beach (from the Cliff House to the dunes) require dogs be on leash, as this is the highest traffic area of the beach, and the most likley destination for tourists. The area along the dunes, which is less traveled, should be designated as off-leash. Again, it would effectively encourage dog owners to use that portion instead. South of Sloat should require dogs be leashed, perhaps banned during mating season (but only during mating season). This would ensure protection for plovers and convenience for tourists while still allowing dog walkers/owners a viable option for off-leash areas. The promenade should, of course, require dogs be on-leash in interest of their own safety. I'll also note I've personally rescued several wild animals at Ocean Beach, which I wouldn't have even come across if not for walking my dog off-leash (injuries caused by human trash and products, and once natural causes).

Fort Funston (proposed Alternative C): Current proposal recommends ROLA for North of the parking lot to the beach access trail, dogs banned from far north, leashed south. Instead, Fort Funston should remain as it is, with the exception that the beach north of the beach access trail adhere to the same restrictions and southern Ocean Beach (ie: dogs on leash, perhaps banned during plover mating season). Fort Funston is almost exclusively a dog park, and an oasis for dog lovers everywhere, and should rightfully, in interest of the community, remain so. However, perhaps requiring dogs be leashed within 100 feet of the parking lot, for everyone's safety, would be a reasonable change. If any park should be kept essentially as is and in favor of dog owners and walkers, it should be Fort Funston.

Mori Point: The current proposal recommends dogs be leashed in all areas. Mori Point, like Lands End, is another nebulous issue. The proposal claims it's in the interest of sensitive habitat, but for some time now the park has been under extreme development: vegetation destroyed, constant volunteer work, construction of a wooden walkway and stairs (hardly "natural"), etc... To claim dogs are a threat to sensitive habitat when people have been destroying it for some time is ridiculous, and Mori Point has seen some of the most human intervention and development recently. Instead, I propose dogs are allowed off-leash on the Coastal Trail, the trail leading from Bradford Way to the promenade, and Sharp Park Beach. All others, including the promenade, should require dogs be leashed (in interest of multi-use and any work being done). This allows sufficient multi-use areas while still allowing dog owners many off-leash opportunities, and protecting recent developments (not "sensitive habitat"... DEVELOPMENT). Please note: as a dog owner who allows his dog off-leash, I've rescued MANY wild animals at Mori Point (whose injuries were inflicted by humans' trash, oil, etc...).

Of course, with all of these you would still hire more staff to enforce clean-

up laws, respect for off-trail habitat, etc...

Correspondence ID: 418 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 08:39:26

Correspondence Type: Web Form

Correspondence: I take my two dogs to Ft Funston every day, rain or shine. They get their exercise there, and, additionally, they socialize with other dogs every day. BOTH activities are vital for their well being and overall health. In addition, my daily activities are my only exercise and outdoor time. The rest of the day, I am indoors working.

Walking them on a leash would be difficult for me, since I have physical disabilities which limit the use of my wrists. My dogs are well trained, very friendly, and do not cause any problems. They thoroughly enjoy the other people and animals they see every day, and trot up to them and wag their tails.

Your new plan would entirely eliminate our use of the area I have utilized for over forty years. A tiny area near the hang gliders is totally inadequate, and the walk down to the beach and, moreover, UP again is impossible for me at my advanced age.

My doctor tells me that my daily exercise on the level area of Ft Funston is vital to my health. Your proposal eliminates that.

My dogs and I BOTH use the area. You should not eliminate the area my dogs need to run freely in. As I said, I cannot control two leashes, or even one, for a two hour walk. I spend two hours at Ft Funston EVERY day, rain or shine.

I would not be able to continue to do so if your ill advised plan goes into effect. I believe San Francisco decided that land to you on the condition that the use remains the same. I object to your closure of an open space for dogs to run, as God intended.

I could say much more, but I wish to totally disagree with your "environmental" attitude to an area which has not been harmed in the least by my current use.

I demand much more open space for dogs to run, and could see you closing off, say, HALF of the park, but the WHOLE THING? That is totally unreasonable, and another example of government overreaching and dominating the public, instead of simply sitting back and letting the people

do what the majority want to do.

On any weekend day, you see hundreds of people and dogs enjoying the area, and all of the dogs are able to run free. THAT is the way the area has always been, and that is the way it should remain. You can fence off some critical sections, but a huge area of iceplant and sand seems to be a totally available area to me. It's just sand, for goodness sake. Sand and iceplant. I don't see how my two dogs, or any number of other dogs, can possibly hurt sand and iceplant.

As far as people picnicking and such, there are PLENTY of parks where dogs are not allowed. Ft Funston is a DOG PARK. Always has been, and always should be. Give us a break. My old body can't conform to your environmental requirements to have my dogs tugging on a short leash for two hours every day.

Don't take away something which is not yours to take. Obviously, you are not aware of your promise to the people you made when San Francisco signed the land over to you. As a matter of fact, except for the daily collections of the trash, nobody needs the United States Government there at all. The people are doing fine at keeping things clean and controlled as it is. That day I saw horse mounted law enforcement cops trotting around for a day or two several months back, I was appalled. Who needs that? Nobody. The area is well regulated by the citizens, and we don't need bureaucrats messing with it.

Correspondence ID: 419 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 10:08:38

Correspondence Type: Web Form

Correspondence: I OPPOSE the Draft Plan/Draft Environmental Impact Statement (Plan/DEIS) for Dog Management:

Reducing the off-leash area will make it more difficult for certain sections of the community to use the parks. The elderly, the disabled, and people with children rely on the wide open space for access and safety. Reducing the off-leash area at Fort Funston for example will concentrate dogs in a small area where those with mobility issues will not be able to walk safely.

A healthy community can only be achieved by keeping the off-leash rules as-is. If dogs are prohibited from getting exercise in these spaces it will affect their behavior. They need these outlets to keep them healthy. The result would be under-exercised and under-stimulated dogs that will have an effect on the city. Many dogs need to socialize in the wide-open space as-is now. Many dogs do not do well in small spaces. Small dogs need open

space in order to get the exercise they need. Small dog parks can be dangerous for small dogs. There are predatory drift issues and simply the size difference alone can make for dangerous situations where dogs can get hurt in cramped dog parks. The open space provides the only safe alternative in this city.

It will overload other city parks in SF and Marin as dog owners are pushed out of the GGNRA off-leash area. This concentration of dogs in small spaces will lead to environmental problems and social issues.

I have made many friends from all walks of life at Fort Funston and other GGNRA off-leash areas. I would never have met these important friends if it were not for this land being off-leash. The proposed plan will shut off a community.

People who use this open space are a diverse group who encompass every social group in society. It is one of the few spaces where everyone is included. Many people who do not have dogs go to these spaces to enjoy the meeting dogs. People with strollers, walking aids, kids on bikes come to Fort Funston with their dogs as they have plenty of room to walk on the trails. This will no longer be possible under the proposed changes.

There are many places to go if you do not want to be around dogs or want to be around on-leash dogs only. Every section of the community has choices. Do not take our right to this open space away.

Dog owners are concerned about the environment. It is the dog walkers at Fort Funston that organize clean-ups and promote education and responsible dog guardianship.

Correspondence ID: 420 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 10:30:40
Correspondence Type: Web Form
Correspondence: Your preferred alternatives seem to be "no dogs." How is this inclusive? It appears to exclusionary. You talk about "fear of dog bites," yet offer no evidence that this is a problem. While you talk about environmental concerns with dog waste there again there is no evidence that dog waste is polluting the waters of the state, and in fact if DNA were done, I think you would likely find the pollution, if any, would be from people and birds. Last, you talk about the enjoyment of the park but I would ask for whom? Certainly not dogs and their owners. Thank you, Liz Kanter, dog owner

Correspondence ID: 421 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 11:42:07

Correspondence Web Form

Type:

Correspondence: Please consider an enclosed off-leash dog area, ideally with large and small dog sections, and keep the remainder of the park areas for on-leash use only. Sadly the actions of the few make off-leash dog use incompatible with high density mixed uses; no one should have fear of using the park. Yes the number of incidents is small statistically, but their impact and the cost of enforcement is great. Much easier to maintain a designated space. Trying to enforce "voice control" is ridiculously subjective. Every dog owner thinks their dog is under reasonable voice control, same as parents think of their kids.

Correspondence ID: 422 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 11:58:17

Correspondence Web Form

Type:

Correspondence: No change.

Dear Sir or Madame:

When I moved to the Bay Area 2 years ago, a major selling factor was the "dog friendliness" and amazing off-leash parks. Without these parks, I would likely have chosen otherwise. It is reasonable to assume that you will hurt the local economy with this proposal, for comparatively little gain. A cursory review of market data for the pet industry in the Bay Area tends to show that the industry generates significant revenues, helping to stabilize marginal spending in a volatile economy.

Please do your part to keep the Bay Area a haven for responsible pet owners. Put a stop to these regulations with a firm hand. Protect our local economy, our local citizens and our local pets. Thank you.

Please feel free to contact me with any questions.

Sincerely,

Ryan McGraw

Correspondence ID: 423 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 12:33:57

Correspondence Type: Web Form

Correspondence: No Change

Correspondence ID: 424 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 12:39:30
Correspondence Type: Web Form
Correspondence: No Change.

Correspondence ID: 425 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 12:39:38
Correspondence Type: Web Form
Correspondence: No Change.

Correspondence ID: 426 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 13:34:09
Correspondence Type: Web Form

Correspondence: My name is Natalie Tondelli, and I am a graduate of the SF SPCA's Dog Training Academy. I am both pro- nature and pro-dog and I cherish the ability to enjoy and walk at Fort Funston and other areas on the GGNRA. I understand the need for their to be a comprise for the equal use of GGNRA lands for both dog people and non dog people. But I feel the proposed plan on the table now is unrealistic and unmanageable for all the thousands of SF Bay area dogs and their owners. San Francisco is such a special place because we are allowed the opportunity to enjoy such wonderful parks and scenery of the GGNRA, especially with out four legged family members. I have enjoyed taking my dogs to many of the off leash areas in the GGNRA for nearly a decade. Because SF is such a dog friendly city, is the reason I continue to rescue dogs and train them (as well as train their owners). The off leash access provided by the GGNRA has been so beneficial to the success and lives of these types of dogs who otherwise would not be able to find a home. Responsible dog owners have used the GGNRA for over 20 years and it has been so critical to the health and balance of such a densely populated city and the dogs that inhabit it. If we were to loose the small off leash areas that we have currently, all SF dog walkers and owners would take over and invade the even smaller number of legal off leash SF City Parks. These displacements will inevitable cause more problems for SF residents and neighborhoods due to the lack of other options to exercise their dogs. It is because of the GGNRA and other open spaces that we are able to have balanced and well behaved dogs in such a densely populated city. It is vital for the sanity of both dogs, their owners, AND their neighbors that we continue to permit off leash access for people to exercise their dogs. I understand (and have witnessed myself) that not everyone is a responsible pet owner and there have been conflicts brewing over use of space and the sharing of nature/ trails/ beach/ wildlife/ etc. with non-dog people. So here are some suggestions and possible alternatives that have been brought up by other pro-dog people over the past few years: 1 Why not let the dog walkers, dog owners and pro dog people police themselves? By allowing people a permit, they are granted access to the GGNRA and the

opportunity to run their dogs off leash? 2 Professional dog organizations and advocates are capable of organizing and CHARGING both business and individuals to use the land to exercise their dogs at. It is a luxury, and people get so much enjoyment from the GGNRA. And I am positive people will be more than happy to pay to be able to continue to use the land. 3 This will increase annual revenue for the GGNRA, and also allow responsible dog owners continued access to use the park. If people do not pay, or their dogs are unruly, aggressive or the owners are uncooperative with the standard policies, they lose their privilege of using the park. 4 If given permission from the GGNRA, why not allow pro-dog people the opportunity to fence off and dog proof restricted and sensitive habitat areas to reduce further eco-wildlife problems in the park? The park has limited and unsuccessful barriers now that people do not know where are the restricted areas and they do not keep dogs out of those areas. I hope you take my letter seriously, and I hope that you will come to a balanced decision regarding the off leash policies of the GGNRA. I hope to be able to enjoy it in the future with my future children and my future dogs.

I would love to be a part of the committee or decision-making process. If I can help please let me know.

Thank you for your time,

Natalie Tondelli Top Dog SF San Francisco, CA 94116

Correspondence ID: 427 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 13:35:53
Correspondence Type: Web Form
Correspondence: Thank you to the GOGA for finally enacting some type of plan to manage dogs in the park. For too many years regular park visitors have been bullied by DOG OWNERS. For some reason they feel their pets are more important visitors to the park than people. What ever the plan, the most important thing for the GOGA to do is ENFORCE the rules. Dog owners need to be held accountable for the actions of their dogs where ever they are in the park. This is not about animal behavior, its about humans not following the rules. I wish you the best. Sincereley, Pete Caraher

Correspondence ID: 428 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 14:27:44
Correspondence Type: Web Form
Correspondence: Reducing the number of areas where dogs can run off leash doesn't solve the problem. Protecting endangered plant and animal life is a priority, as well as

making our parks accessible to all. However, even on leash, some dog owners still violate all the rules. Proper enforcement of the EXISTING structure is what is needed. Enforce clean-up rules, enforce the on-leash rule in the areas where it is currently required. Enforce that owners must have an off-leash dog under voice control. Currently none of this is being enforced, leading to complaints that make it seem as if shutting down off-leash areas will improve the situation. It will not!

Correspondence ID: 429 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 15:27:05

Correspondence Type: Web Form

Correspondence: Why do dogs need to be restricted to a leash at Crissy Field. There's no reason why there can't be a specific area at Crissy Field specifically for dogs to run off leash. There's plenty of room to have part of Crissy field designated as an off leash area for dogs. San Fransico has plenty of dog owners and plenty of parents and both can co-exist at Crissy field. Making dogs stay on a leash at Crissy Field is completely extreme and unnecessary.

Correspondence ID: 430 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 15:56:25

Correspondence Type: Web Form

Correspondence: Kudos for this plan to restrict off-leash dog use at many GGNRA beaches. As a mother of a 2-year old who has been chased, barked at and snarled at by dogs on local trails and beaches, I firmly believe dogs are dangerous animals that need to be kept under control -- and "voice control" means nothing when the owner is not even in sight or paying no attention. (When sunbathing, I have been trod upon, disturbed, and forced to move by packs of dogs running wild on Baker Beach and Ocean Beach when they were supposedly under "voice control".)

I am also a birder, and want our coastal dune habitat preserved for local native species that nest in the sand and dunes. Birds such as Western Snowy Plover are already in severe decline and nest destruction and harassment by dogs is a serious issue in Point Reyes and GGNRA.

I know the dog-rights crowd is very opposed to this plan and unleashing a torrent of criticism, but in fact, you have restored some critical balance to a situation where dogs have been allowed to run wild for years, at the expense of other park users, including wildlife, young children, and people who do not wish to be disturbed by dogs. Thank you for your efforts on this issue.

Unfortunately, my experience on Mt. Tam trails shows that even where

leashes are required, many dog owners will disregard the rules. I hope that rangers and the public will step up to ensure that leash laws are strictly enforced.

Correspondence ID: 431 **Project:** 11759 **Document:** 38106

Received: Jan,28,2011 16:23:30

Correspondence Type: Web Form

Correspondence: These comments, which also reflect the views of my wife, are made in connection with GGNRA consideration of its policy towards dogs. We are very frequent visitors to the GGNRA and long-time members of the GG Parks Conservancy. We love to hike, ride our bikes and enjoy the beaches. Dogs significantly detract from our enjoyment of the park areas. Therefore, we support stringent regulations of dogs - they should be kept entirely out of most areas and, where they are allowed, they should be leashed at all times. The only situation where they should be allowed to run free is within a fenced off dog run area. Unleashed dogs are a safety risk, are bad for wildlife, defecate and urinate in areas used by the public, and are unwelcome by many park visitors.

About a year and half ago, (on "bike to work" day) I decided to ride my bike from Marin into work in SF. As I was riding through Crissy Field (on a designated bike path) an unleashed dog unexpectedly ran into my path, resulting in a serious accident, a call to 911 to summon an ambulance, and a trip to the ER. (I assume the Park has some record of this incident.) Fortunately, I was wearing my helmet and my worst injury was some cracked ribs, but my recovery took several months. Unleashed dogs present a substantial danger to bikers - I hardly know anyone who rides a bike who doesn't have a negative dog story to tell.

In addition, I have been bitten several times in my life - each time by an unleashed dog, and each time the owner said the same thing: "Gee, he's never done that before." (It is well known that dog bites are one of the most common forms of injury.) As a result of these incidents, I get very uncomfortable when approached by an unleashed dog, and it doesn't make things any better when the owner says "he's friendly."

There is no question that some people can control their dogs by voice command. However, for every person who can exercise voice control over his/her dog, there are several who think they can but can't. In this respect dog owners are like drivers - every one thinks they're a good driver, but there is often a disconnect between people's self assessment and reality. Perhaps such people can control their dogs in the privacy of their own homes or yards, but when their dogs are placed in an area with wildlife, other dogs and people, they seem to be overcome by instincts and urges that

quickly make them disobedient. And, regrettably, some dog owners just don't care that their dogs make others uncomfortable - they seem to think that if you don't like their dogs, well then tough luck.

Of course, dogs don't mix well with wildlife. Their natural instincts make them eager to chase and, thereby, harass birds and mammals. I have one friend who thinks it's "cute" to see her dogs chase squirrels - she actually encourages them to do it. Viewing of wildlife is a valuable and important part of the outdoor experience. It is important to protect the wildlife from being harassed - in my experience the native wildlife quickly abandons an area that is overrun by dogs.

A particular concern is with professional "dog walkers" who bring packs of unruly dogs to the park areas. There are no qualifications to be a dog walker and many of them appear to be incompetent. This activity should be prohibited or severely restricted. If allowed, dog walkers should be required to obtain a permit and proof of insurance. What's doubling annoying is that, from what I hear, most of the "dog walkers" do not report or pay taxes on their income - in other words they expect the rest of us taxpayers to provide them with free access to parks so they can make some tax free income.

It is regrettable that there are so many irresponsible dog owners, such that strict measures are required. Moreover, any policy that is adopted must be enforced.

Correspondence ID: 432 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 17:24:52
Correspondence Type: Web Form
Correspondence: No change! Dogs are part of our families that most need and enjoy the outdoors. There is no need to restrict well behaved dogs!

Correspondence ID: 433 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 22:52:31
Correspondence Type: Web Form
Correspondence: No change in rules for dogs on beach

Correspondence ID: 434 **Project:** 11759 **Document:** 38106
Received: Jan,29,2011 01:52:24
Correspondence Type: Web Form
Correspondence:

Correspondence ID: 435 **Project:** 11759 **Document:** 38106
Received: Jan,29,2011 09:55:43

Correspondence Web Form

Type:

Correspondence: I am a San Francisco resident and own 3 companion dogs. In San Francisco the dog-friendly parks are extremely limited, and finding access to open running space for dogs is difficult, save for the GGNRA. While I am fully on-board with conservation efforts, this plan to reduce dog accessibility to the GGNRA strikes me as an attempt against dog-owners, made by those who do not like dogs. I would like to see in large open areas that these public spaces remain dog-friendly so that our companions have open space to run.

My dogs are my children. They bring so much joy and vibrancy to my and my husband's life. To further restrict my ability to access the GGNRA with my dogs would be very saddening. Please keep the last 1% of the dog-friendly GGNRA accesible to all dog owners who visit the GGNRA.

What I would truly love to see are some fenced in areas within in the city where dogs can run. The park at Duboce Triangle would be great, except there are no fences in that high-vehicle-traffic area. Please keep the GGNRA available to us.

Thank you.

Correspondence ID: 436 **Project:** 11759 **Document:** 38106

Received: Jan,29,2011 10:36:50

Correspondence Type: Web Form

Correspondence: I am a long term resident of West Marin and hike frequently on NPS and GGNRA administered lands in West Marin. I am not a dog owner currently, although I have been in the past. In the last 10 years, the intrusiveness of dogs has increased significantly with the walking of dogs where they are not permitted and more dramatically walking dogs without leash where they are required. The dog owners often seem of the view that 'my dog is just fine' and raising the issue with them, however polite one tries to be, is very difficult and liable to result in a very defensive to actively hostile reaction. I have noted to several dog owners who have stated, in effect, "my dog would never bite anyone." Assumed, of course, is that the rules don't apply to them and even if they did, there is no harm. I stated on one occasion when raising the issue with the owner of a large dog, that if I had one of my younger grandchildren with me, the dog's muzzle would be at face height of the child and if the child had been with me, I would have filed a formal complaint against the dog owner. the dog was off leash in a prohibited area.

I am pleased that GGNRA is working through the process. Dog owners should have areas available for off leash recreation. And the ecological

values of park lands, e.g., the Giacomini Marsh, should be honored.

Thanks

Michael Mery

Correspondence ID: 437 **Project:** 11759 **Document:** 38106

Received: Jan,29,2011 12:06:01

Correspondence Type: Web Form

Correspondence: Dear GGRNA,

The open lands of Rancho Corral de Tierra is one the many reasons my family enjoys living in El Granada. We have lived here for over 10 years and walk our dog on the hills behind El Granada off leash since we adopted her 6 years ago. It is the last place on the coast where we can let her run off leash. The beaches either ban dogs altogether or require a leash. Other regional parks also ban dogs or require a leash as well. There are no places to take her and let her run off leash except in the Rancho Corral de Tierra space.

With all of these limitations where can dog owners go to walk their dogs besides the roads where cars an running up and down the street? We don't have many sidewalks in El Granada so you are forced to walk in the street. This is dangerous for both drivers, dog walkers and dogs.

Making walking a dog in the Rancho Corral Tierra a crime is a very extreme measure to levy against the residents and visitors using this open space. It is our neighborhood's local park and it is one of the few places outdoors that we can share with our dogs. Residents have been walking their dogs in this space for over 50 years and it is one of the reasons that we all enjoy living here with our dogs.

Considering the entire area of Rancho Corral, can't some space close to the neighborhoods be preserved for dog walkers? This land is not pristine as horses, bikes, people, motorcycles and sometimes even cars drive up on the lands close the neighborhoods.

Residents have been using this land for over 50 years and have been good stewards of the land under no formal directive from the county or state. We have raised funds for POST so that these lands could stay open and free of development. Yet GGNRA has not taken into consideration how the residents would like to use this open space. We are not being treated fairly by banning our dogs from this land.

The GGNRA Dog Management Plan for Rancho Corral is unfair and sets no space aside for dogs. There are off-leash areas allowed in Marin and San Francisco counties. Why can't we have this option for Rancho Corral?

Please consider the residents and our dogs when making your decision. It affects the well being of not only our dogs but their owners which are the tax payers and POST supporters who helped to keep these lands open and free from development.

Sincerely, Roxane Osborne El Granada resident

Correspondence ID: 438 **Project:** 11759 **Document:** 38106
Received: Jan,29,2011 13:36:10
Correspondence Type: Web Form
Correspondence: These policies are too restrictive, especially completely banning dogs from Muir beach and Stinson Beach.

I understand the reasons behind the preferred alternatives, but dogs - and their owners - have the same rights to recreate in public areas too. I was told by a park ranger that dogs were going to be banned from Muir beach because of environmental concerns, especially for the creek restoration.

A more reasonable solution would be to let the dogs be off leash on the southern part of the beach, and signage could be placed along the stream that specifically bans dogs from that area. Raising awareness with clearly posted signs is what is needed, not wholesale draconian measures that disenfranchise all dogs and their owners. This is what is proposed for Chrissy field, and there is no reason it cannot work on Luir and Stinson as well. Additionally, I might add that it can be a little crowded on weekends at Muir beach and that it might make sense to allow dogs off leash on weekends only in the mornings before 9 and after 5 pm.

Again, this kind of restriction can accomodate all users, instead of shutting out people with dogs who also deserve a piece of the publicly funded recreation options. And please do not ask dogs to stay on leashes on a beach - it just goes against the dogs' nature and is really inhumane.

Re: Stinson beach - I am not sure whay they want the entire beach to be closed for dogs, but really, there needs to be an area for dogs, and an area that does not allow dogs. A compromise is a real solution, not this kind of one-way proposal that keeps dog owners from having reasonable access to public beaches. Yes, my dog likes trails also, but they LOVE the beach when we go there and it is obvious they are very happy - as am I - when we

get to enjoy some beach time.

Dog owners pay taxes also, and should be accomodated on public lands. NPS, you've gone too dog-gone far on this one. Throw us a bone and let us have access to our public lands also. Don't shut out our dogs just because they can't vote or speak. I will speak on their behalf: "We love the beaches, and want to be able to keep going there."

Correspondence ID: 439 **Project:** 11759 **Document:** 38106

Received: Jan,29,2011 14:14:59

Correspondence Type: Web Form

Correspondence: My name is Rusty and I am a dog.

First of all, your Executive Summary was too confusing, even for my owner!

Here are my votes:

Homestead Valley: Alternative A

Stinson Beach: Where's the beach? - I got nothing!

Muir Beach: Alternative A - I will stay out of the creek; I like salmon too!

Rodeo Beach: Alternative A, or the preferred alternative would be OK, but better if I could walk the entire beach.

Chrissy Field: Alternative A

Baker Beach: Alternative A

Marin Headlands : Alternative A

Ocean Beach: ALternative A

These are my favorite places. PLEASE let me and my owners stay!

Here's a little song I howl sometimes:

Oh, give me a place, where us doggies can roam,
Where the dogs and our owners can play,
Where seldom is heard a discouraging word,
And our poop is picked up each time.

Roam, roam on the beach
Where the dogs and their owners can play,

Where we leave the wildlife alone, And don't bury any bones, And act friendly to all on our way.

Thanks NPS!

Give me a home, where the dog and the people play!

Correspondence ID: 440 **Project:** 11759 **Document:** 38106

Received: Jan,29,2011 14:30:11

Correspondence Type: Web Form

Correspondence: To whom it may concern,

I am very disappointed to hear many of the local parks currently off-leash for dogs is considering discontinuing this practice. I often bring my dog to Fort Funston and find it to be one of the absolute best assets in the area. It is vast space that is safe, beautiful and wonderful place for dogs and their owners. Crissy Field is another area my dog and I frequent. I believe they represent some of the best San Francisco has to offer in terms of outdoor space, kind and friendly people and safe environments. I truly feel changing the current policy would be a disservice to the city and its residents and dogs. San Francisco is known to be a very dog-friendly city and it will likely lose much of this cache with these changes.

Please do not take these beautiful facilities away from my dog, myself and all of the other responsible pet owners to truly love these spaces.

Kind regards, Jennifer Lake

Correspondence ID: 441 **Project:** 11759 **Document:** 38106

Received: Jan,29,2011 20:25:53

Correspondence Type: Web Form

Correspondence: Thank you for your work on this DEIS. I support the proposed alternative, with one major exception:

I am very disappointed that the proposed alternative does not require that all areas for off leash dogs be fenced or otherwise physically restricted. The foremost duty of the National Park Service in all units is to protect its units' resources. Off leash dogs that are not enclosed by physical barriers, whether natural or man-made, pose a serious threat to those resources. Dogs do not recognize human boundaries if those boundaries are not physically restricted, and off leash dogs will wander outside them. Once they do, there is a strong chance that they will negatively impact the park resources.

Physically restricting off leash dog areas is the only way to ensure that dogs will not run off leash where they will negatively impact people, wildlife, and even leashed dogs.

Voice control does not exist in reality; it is nothing more than a myth perpetuated by off leash dog advocates for the purpose of convincing people that dogs should be allowed off leash because they can be controlled by voice commands. Nothing could be further from the truth. A dog that is chasing another animal or a person will continue to do so regardless of any training or voice command. We've all seen out-of-control dogs being yelled at by their owners many times, with the dogs totally ignoring the owners and continuing to do whatever they're doing.

I urge you in the strongest terms to add physical barriers to your preferred alternative. I would support the preferred alternative if you do so.

Correspondence ID: 442 **Project:** 11759 **Document:** 38106

Received: Jan,30,2011 10:32:23

Correspondence Type: Web Form

Correspondence: I am a frequent user of the GGNRA, hiking and biking throughout for years. I am fully supportive of the NPS to bring dogs under more restrictive controls. Here are experiences I have personally witnessed:

- o At Tennessee Valley entrance, where signs are posted at the entrance ("No pets") regular violation of the restrictions.

- o At TV, When I've told people dogs aren't allowed, they get rude.

- o At Rodeo Beach, I have asked dog owners to clean up their dog feces and they've refused. In one case, leaving dog feces in the surf near where children were in the water.

- o Throughout the headlands biking trails I have passed people walking multiple dogs off leash, while the dogs were running off trail.

- o I have witnessed dog fights: arguments between dog owners and other users.

- o At several entrances near parking lots, there are locations where dog owners think it's "ok" to let their dogs defecate as long as it is off trail. When I've pointed it out, they've responded, "I don't see a sign."

Good luck . Those of us following the rules are with you 100% and recognize the difficulty of accommodating the dog owner user groups to the

GGNRA.

Correspondence ID: 443 **Project:** 11759 **Document:** 38106

Received: Jan,30,2011 13:15:36

Correspondence Type: Web Form

Correspondence: Dear GGNRA, My dogs and I have used Ft. Funston, Stern Grove and Chrissy Field for 25 years. Within this time I have never experienced, or observed inappropriate use of these area. I also have not read in the newspaper any incidences of danger or misuse of these locations involving dogs. "If it's not broken why break it" I urgently wish to add my voice to this issue and request the 1979 plan remain. Respectfully, Coreen Abbott

Correspondence ID: 444 **Project:** 11759 **Document:** 38106

Received: Jan,30,2011 15:53:22

Correspondence Type: Web Form

Correspondence: Preferred alternative should be E, not D

I have been a responsible dog owner for 20 years and walking my dog in Rancho de Tierra lands for many years. There are very few people accessing this land and most are with their dogs. There is simple no one, on a percentage basis, to bother. Please do not over regulate land that is suppose to be for the good of us all.

A total ban on dogs is not acceptable (or a complete ban on dogs is extreme). Use this phrasing as opposed to specifying off leash, or on leash.

No scientific studies were done of Rancho lands to justify banning dogs.

Residents in the bordering neighborhoods of Rancho (Montara, Moss Beach and El Granada) have been walking their dogs on Rancho trails for decades.

Residents have been self-policing: In Montara, dog-waste management (disposal cans and pickup bags) is maintained by Montara Dog Group volunteers. Neither fenced or patrolled, trail conditions are excellent given their heavy use. Residents report improper or illegal activity to officials. Montara Dog Group has had a good working relationship with POST.

Tim

Correspondence ID: 445 **Project:** 11759 **Document:** 38106

Received: Jan,30,2011 17:49:38

Correspondence Web Form

Type:

Correspondence: I have lived in the Bay Area for a dozen years and enjoyed all of the GGNRA sites very much. Thank you for your attention to creating a mixed-use environment where all people and animals can enjoy themselves.

Two years ago, I rescued a dog from Mexico. We have lived in Moss Beach and in San Francisco together and enjoyed many GGNRA locations together (Muir Beach, Ocean Beach, Fort Funston, Chrissy Field, etc.) There are so many locations (especially State Parks) that are off limits to dogs and I am grateful to be able to take my dog to GGNRA areas.

I am especially grateful that we get to experience some of these areas with off-leash or voice-command. This provides an excellent environment for dogs to play and socialize in a way that is impossible while they are on leash. The dogs run up and down the beach together, tumbling in the sand - impossible on leash. We ensure that we pick up his waste and that our dog does not run up to strangers who do not wish to have his affection.

The closure of GGNRA areas to dogs - or even leash restrictions as presented in the Draft Dog Management Plan - would change the dynamic of GGNRA areas. There would be no spaces for dogs to play freely. There are so many places closed to dogs that visitors can choose if they do not want to interact with animals, but well-behaved dogs deserve a chance to run and play with their owners and friends in these beautiful outdoor spaces.

Thank you for hearing my comment. I hope that you will choose NOT to change the dog management and pursue NO ACTION at this time that will constrain dog access.

Correspondence ID: 446 **Project:** 11759 **Document:** 38106
Received: Jan,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dogs that are well trained should not be on a leash.

Correspondence ID: 447 **Project:** 11759 **Document:** 38106
Received: Jan,30,2011 20:00:30
Correspondence Type: Web Form
Correspondence: I am both a dog owner and a member of the Audobon society. I completely support protecting vital bird habitat. There is only one Pacific flyway and we need to protect this vital habitat for migrating birds. It makes no sense to allow a species to disappear just to give our dogs places to run. In addition, while many dog owners are responsible, many are not. They do not pick up feces or keep dogs off fragile areas. They had a chance to show they could

be good neighbors to the birds and they did not. Furthermore, I would like to see much better enforcement of violations.

Correspondence ID: 448 **Project:** 11759 **Document:** 38106

Received: Jan,30,2011 22:50:13

Correspondence Type: Web Form

Correspondence: My family has lived in San Francisco since 1974 and have gone to Fort Funston every 1-2 months since our children were infants. We have walked our dogs in the area for the same length of time. Our family has enjoyed this recreation area partly because the dogs are able to run and play with other animals. The animals are not aggressive - partly because they are able to run and not defend their owner.

As my husband and I work full time, we have employed a dog-walker who also takes dogs to this area. If we could not have access to this area, it would be very difficult to live in the city where we both work.

Please keep the area of Fort Funston open to dogs and their families, dog walkers and allow the animals to continue to enjoy the outside play off leash.

Thank you.

Correspondence ID: 449 **Project:** 11759 **Document:** 38106

Received: Jan,30,2011 23:38:00

Correspondence Type: Web Form

Correspondence: Hello, I am a 26 year local resident who has lived on the Coastside for 26 years. I currently live in Moss Beach. The Rancho Corral de Tierra has been my backyard growing up and is literally my back yard now, as I am typing this comment I can see where my backyard's mesh fence is allowing the wild grass and clover to take over my lawn. The loss of my manicured backyard comes invited because I prefer the spotty patches of clover with their yellow blooms and the various other grasses i don't know the names of. Since I have lived her I have had dogs, first with my parents while growing up and now as an adult with a child of my own. I take my Dog through the Rancho Corral De Tierra at least three times a week. I am owned by a 7 year old Pitbull Terrier that needs to run miles and miles. The area I call my backyard is very important to my dogs health and the pleasure I get while running her while enjoying the area. I enjoy hiking deep into the area and always feel safe with my dog because I know that she will help detour an praying mountain lion. I have read the GGNRA's plan for the Rancho Corral de Tierra area and feel that the best suited plan is alternative E. I truly feel

that dogs who are under control, whether by voice or by leash, pose less a threat to the beautiful habitat we all enjoy than the horse riding community. In fact I am surprised to hear nothing about the impact that the Equestrians have on the trails. Thanks for allowing me a place to voice my concerns and opinions. As an active citizen of the area I enjoy being able to influence the way my home gets treated and defined, so please don't take away the right to run my dog in my backyard.

Correspondence ID: 450 **Project:** 11759 **Document:** 38106

Received: Jan,31,2011 08:32:07

Correspondence Type: Web Form

Correspondence:

Correspondence ID: 451 **Project:** 11759 **Document:** 38106

Received:

Jan,31,2011 10:08:53

Correspondence Type: Web Form

Correspondence:

Please make NO CHANGES to the existing leash laws and dogwalking regulations. This will incur a huge hardship for both dog owners and dog care takers. Thank you for your consideration.

Correspondence ID: 452 **Project:** 11759 **Document:** 38106

Received:

Jan,31,2011 11:52:12

Correspondence Type: Web Form

Correspondence:

Dear GGNRA,

There has been nothing that has given my dog Daisy more joy than running free at various GGNRA parks. We love nothing better than to pack up a lunch and head out to the beach for a day of running and playing in the sand and water. We meet other dogs there and they play together with such joyous abandon. It would break my heart if this activity ceased to exist. Every dog owner I have met has been courteous. I rarely find that owners do not clean up after their dogs. And if they don't, I do it for them, and have seen other dog owners do the same. There are so many other places for people to go if they don't like dogs. We dog owners have fewer and fewer places to take our dogs off leash. Please don't take this freedom away. It means so much to our dogs to have a place to run free.

Sincerely,

Debi Thiel

Correspondence ID: 453 **Project:** 11759 **Document:** 38106

Received: Jan,31,2011 13:58:34
Correspondence Type: Web Form
Correspondence: I don't agree on this, thanks. Madeline

Correspondence ID: 454 **Project:** 11759 **Document:** 38106

Received: Jan,31,2011 14:36:52

Correspondence Type: Web Form

Correspondence: I would be greatly saddened if you were to decrease the already limited amount of open space allowed to dogs and their owners in San Francisco. Please understand that the vast majority of dog owners here are law abiding and responsible. If there are concerns about irresponsible owners, they should be addressed through education and enforcement of current laws.

Off-leash recreation is critical to dog's good health, both physical and behavioral. Most dogs interact best with each other and with people when they have some freedom to move about as needed.

Please preserve the space and laws as they currently stand. Additional limits and restrictions will cause much more harm than good.

Thank you for your time.

Antonia Moore

Correspondence ID: 455 **Project:** 11759 **Document:** 38106

Received: Jan,31,2011 17:53:53

Correspondence Type: Web Form

Correspondence: My wife and I are both in our eighties and we walk our 4 year old dog at Ft. Funston. We were at Ft. Funston this afternoon and spoke with a gentleman who appeared to be our age and walking his dog. We chatted briefly and he said if he was not there at Ft. Funston with his dog, he would be home in bed.

As we age, walking a dog - off-leash - is a wonderful way to maintain our vitality. We pick up after our dogs and to watch them play brings joy to all the people that I meet there.

If dogs were barred from off-leash walking, Ft. Funston would not be used to any extent and what happens when a large park is not fully, unrully gangs take possession. That is what happened to GG park several years ago.

Dogs off-leash have a way of communicating with each other that we

"humans" should envy. They communicate very clearly to each other and I do not witness dog fights.

Please continue off-leash dog walking at all areas presently used at Ft. Funston

VTY

Tom Devine

Correspondence ID: 456 **Project:** 11759 **Document:** 38106

Received: Jan,31,2011 18:07:20

Correspondence Type: Web Form

Correspondence: While I understand the growing needs to manage all types of foot traffic in these parks, the truth is I come here with my dog because it's a great place for both of us to enjoy the pleasures that come with these great spaces.

If bans went into effect, I would be less likely to come to the park and look for alternatives throughout the bay area or within the city. I feel restricting dogs from the current regulations would decrease attendance at these parks resulting in fewer advocates for when it comes time to really have to preserve/save these areas because of budget cuts, etc.

Thanks, Brian Mayer

Correspondence ID: 457 **Project:** 11759 **Document:** 38106

Received: Jan,31,2011 18:32:25

Correspondence Type: Web Form

Correspondence: I SUGGEST YOU KEEP FORT FUNSTON AS IS.

On paper Ft.F seems like a wonderful place to visit, especially in summer. In reality it is a windy and often bleak stretch of coast frequently masked in fog. Unlike "Fair Weather Fans," dog owners use Fort Funston on a regular basis, in all conditions. I'd bet that more than 85% of the area's use is by TAX-PAYING dog owners. Without "Fort Fundog" off-lease access, dog owners are only going to redirect their energies to places like Stern Grove overtaxing these public places. The constant comings and goings of dog walkers keep the parking lot safe from unseemly behavior. (and the homeless population out of the cypress.) I believe there is a simple alternative to these expensive proposals. Keep things as is but add large signs warning that Ft. Funston is an off-leash dog haven and fence off any

sensitive areas.

If one wants only the view without the animals, there are many alternative stops along the coast. There are no beach alternatives for our pets.

Correspondence ID: 458 **Project:** 11759 **Document:** 38106
Received: Jan,31,2011 22:06:11
Correspondence Type: Web Form
Correspondence: I am dismayed and astonished by your process in a couple of respects: 1) it seems profoundly disrespectful of the needs of Bay Area residents and history of the GGNRA to propose moving to a future that allows no areas within the vast holdings where dogs can be under voice control rather than leashed. 2) Your proposed course of action is certain to be contentious and unenforceable. I strongly urge you to create some areas where dogs can be under voice control as it will make enforcement possible in other areas. I believe you can forge this path despite NPS doctrine. 3) Consider the leashes bring their own risks for mixed use (tripping, falling, etc) and consider technological solutions as part of this. I urge you to consider remote training collars for dogs as the equivalent of an electronic collar that can achieve the benefits of control but allow greater freedom of movement for dogs and avoid some of the risks of leashes. 4) In these difficult economic times it seems remarkable to me that you'd consider taking away so much community control in a manner that will create an increased enforcement burden for you over time. I strongly urge you to consider a more balanced approach. Take Muir Beach for example. Insistent that people have dogs on-leash in all wooded or planted areas but allow voice control on the beach itself. Generally speaking I think the "we'll be cool if you be cool" approach is the way to go and people will accept more restriction if you make a clear effort to better accept the needs of dog owners.

Correspondence ID: 459 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 09:45:56
Correspondence Type: Web Form
Correspondence: My view of the purpose and value of national recreation areas is first to conserve the natural environment and then to provide a quality experience and safe access to the broadest range our populace. Of the criteria used in developing the draft plan, those most important to me are environmental impact, safety, and visior experience. Therefore I believe the alternative most appropriate is alternative D, providing maximum environmental protection and safety.

Correspondence ID: 460 **Project:** 11759 **Document:** 38106

Received: Feb,01,2011 11:59:01
Correspondence Type: Web Form
Correspondence: No change.

Correspondence ID: 461 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 12:07:40
Correspondence Type: Web Form
Correspondence: NO CHANGE

Correspondence ID: 462 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 12:16:42
Correspondence Type: Web Form
Correspondence: I oppose the plan as it will restrict our family activities which includes our dog to very few places. We constantly visit Crissy fields, Muir Beach and the surrounding area when we go on hikes, or day trip to the beach with our kids and dog.

Correspondence ID: 463 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 12:18:09
Correspondence Type: Web Form
Correspondence: Dear GGNRA,

I am writing to express my wishes that "Alternative A," which takes no further action in the matter titled "GGNRA Draft Dog Management Plan / Environmental Impact Statement" be enacted. As a resident and frequent visitor to several of the sites impacted by this plan, I am hopeful that my comments (which will be copied to our state members of Congress) will be considered in the matter that proposes banning dogs in the areas specified in this plan.

Many residents in the effected areas moved there specifically for access to local outdoor resources. In fact, my wife and I, who did not have a dog prior to moving to Moss Beach in 1999, were motivated to buy property in our community in the hope of getting a dog. We had previously lived in the East Bay, in a community that did not have access to more rural trails and recreation areas, and did not feel it was fair to a dog to raise them in a condominium complex, because their access to exercise would thus be limited. In Moss Beach, we can travel a mere 5 minutes and enjoy on- or off-leash walks with our active dog.

Indeed, if we had envisioned losing access to what are now GGNRA lands with our dog, we probably would not have moved to the area. In fact, we

would not have gotten a dog either. He is an Australian Cattle Dog, and needs copious exercise. This is beneficial for us because our frequent hikes with the dog also helps us keep in shape and keeps the dog healthy and happy.

I strongly believe that limiting access to the GGNRA lands with dogs will actually increase dog related problems within the community. With no access to reasonable means for vigorous exercise, dogs become bored and more easily prone to agitation and aggression. Certainly our dog exhibits a greater level of misbehavior if healthy outlets for exercise are not available to him.

Walking in our neighborhood is generally unacceptable for us, because there is a lack of open space in which to run, and we must be quite careful of encounters with other people and their dogs in neighborhoods as many people are uncomfortable with animals on or near their immediate property. There are also neighborhood cats that are tempting to chase, and of course auto traffic, which is also a danger to the animals should they manage to break free of a leash should they become excited by something they see on a walk.

Furthermore, I don't see any advantage to banning dogs from the area regardless of our dog's needs. Environmental impact from dogs is surely minimal or nonexistent. Furthermore, impact from horses, who frequent many of these areas, is likely greater, as their owners never pick up after their animals, and they are larger, heavier, and presumably cause greater wear on the land.

In summary, I would like to push for "Alternative A" to pass. The other alternatives are unfair to people and dogs who moved to these areas in hopes of having a life with greater access to outdoor resources. Changing the level of access to these areas is also inappropriate since many of the dogs who frequent the areas are incredibly active and may actually become problematic or aggressive around other dogs and around people if they are not exercised adequately. Finally, the environmental impact of dogs is insignificant and certainly less than that of horses, which are not being banned.

It would be extremely unfortunate for a vocal minority of residents who do not like dogs to dictate to the rest of us what we can and cannot do with our pets.

Correspondence ID: 464 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 00:00:00
Correspondence Web Form

Type:

Correspondence: I strongly oppose the proposed plan. The recommended action would severely restrict the ability of responsible dog owners (and their pets) to use and enjoy what are already very limited recreation areas. Yet, there doesn't seem to be any factual support for why the recommended option was chosen beyond anecdotal reasoning.

If it's for employee safety, then how many employees have been injured? If it's for environmental reasons, then explain how dogs are the culprit, but surfers, tour buses full of tourists, horse riders, bikers and hikers aren't. If it's to reduce conflicts, then how many and how severe have those conflicts been? (I've been taking my dog to all of these places for a greater part of the last ten years and have rarely, if ever seen any major conflict.)

If, as you say, the number of dog owners has grown dramatically since the 90s, then your proposal will limit the ability of a huge proportion of the regular users of these areas, for very poorly supported reasons. If a small percentage of dogs are causing issues, then the answer is to cite the owners of those specific animals. Not to punish the thousands of responsible owners who frequent these areas.

This is a pet-owner-hostile dictate that seeks to act first and ask questions too late. I intend to do whatever I can to prevent this proposal from passing.

Correspondence ID: 465 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 12:24:12
Correspondence Type: Web Form
Correspondence: No change

Correspondence ID: 466 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 12:24:51
Correspondence Type: Web Form
Correspondence: Regading Muir Beach: Against Preferred Alternative D

The plan to remove all dog access to Muir Beach is not fair to those of us responsible pet owners who have enjoyed taking our dogs there for years. At the very least, alternatives B, C, or E should be implemented if the current usage has been determined to be unacceptable to the environment.

I have no issues with keeping my dog on a leash if it is necessary, but telling me I can't bring my dog is unfair. Humans do FAR more damage to this beach with littering than any dog.

Correspondence ID: 467 **Project:** 11759 **Document:** 38106

Received: Feb,01,2011 12:26:05
Correspondence Type: Web Form
Correspondence: no change.

Correspondence ID: 468 **Project:** 11759 **Document:** 38106

Received: Feb,01,2011 12:35:48
Correspondence Type: Web Form

Correspondence: We need to allow dogs to run freely so they can expend their energy in a happy joyful way. Please don't make us pent up our dogs. They deserve their freedom too.

Correspondence ID: 469 **Project:** 11759 **Document:** 38106

Received: Feb,01,2011 12:53:34
Correspondence Type: Web Form
Correspondence:

Correspondence ID: 470 **Project:** 11759 **Document:** 38106

Received: Feb,01,2011 12:53:56
Correspondence Type: Web Form
Correspondence: No Change

Correspondence ID: 471 **Project:** 11759 **Document:** 38106

Received: Feb,01,2011 13:23:39
Correspondence Type: Web Form

Correspondence: Re: DMP-EIS for transfer of POST land, Rancho Corral de Tierra, to GGNRA

I request that the Alternative E be used, allowing dogs to be walked on the Rancho after its transfer to the GGNRA.

I have lived in Montara for 11 years and have been walking on the Rancho lands and on the McNee State Park since I moved here, accompanied by my dogs for the last ten years. We walk there every day; in the past, we walked there twice a day. Now, we usually walk using leashes, but used to walk more often off-leash.

I have learned so much about the lands, seeing them through my dogs' eyes. Together, with our combined far-seeing eyes and far-scenting noses, we perceive far more wild animals that we would have seen alone. I've gained a deeper understanding of how dogs and humans came to live together.

My 7-year-old son is also learning to enjoy nature in this way, as he

accompanies me on our walks on the Rancho lands. My son has joined us on our walks all his life. It would be very sad for all of us, if the Rancho became yet another place on the Coastside closed to dogs.

I am also concerned that people who now have access to McNee State Park by walking through the Rancho will have their access cut off. This will put further pressure on the few parking lots available on the south side of the park.

Of course, if dogs are not allowed on the Rancho, all of us who currently walk from our homes to walk with our dogs on the Rancho trails, would have to drive to other trails, a far less healthy alternative for the global environment as well.

Mountain lions are visible on the Rancho, coming very close to the human communities every 3 to 4 years. Is it possible that the dogs walking daily on the trails discourage the mountain lions from visiting more often?

Thank you for your attention.

Correspondence ID: 472 **Project:** 11759 **Document:** 38106

Received: Feb,01,2011 13:24:22

Correspondence Type: Web Form

Correspondence: As a retired person, and a life long resident of Novato, I have enjoyed walking and hiking, much of Marin County and beyond, all my life. Here are some of my observations on dogs in the public...

Most dog owners say there is a small percentage of dog owners that are not responsible and give all dog owners a "bad name". My observation is that most dog owners are irresponsible and only follow the rules if there is someone of authority observing them. As an example, I hike Mount Burdell often, usually from the San Andreas trailhead. This is a popular place for dog owners to let their dogs run. When most dog owners arrive they open their vehicle and turn their dogs loose. With this found freedom the dogs usually take off and often the owners don't even watch where their dogs go. Often I have observed the dogs pooping everywhere, peeing on car tires, licking and jumping up on other hikers, attacking other dogs, etc. The area around the trailhead and the next 200 yards up the hill is a poop minefield. Some dog owners pick up after their dogs but not all that do, take the plastic bag with them. I guess their plan is to "pick it up on their way back". But the plastic bag is often still there the next time I hike. Other folks pile the plastic bags at the entrance gate so someone else can pick it up. There is usually a fresh sign at the gate stating that the dog owners "must pick up after their pet and remove it from the open space". If there is a Ranger there the

compliance goes up, so they know the rules but chose to ignore them. One morning I saw a Open Space Ranger parked on a hillside fireroad and observing the area below with field glasses. When I got to him I asked what he was doing. He said he was doing a survey to see how many dog owners were in compliance with Open Space rules so they could decide if there needed to be more enforcement. I asked how the dog owners were doing, he said not very good. This survey may be available for you to have to use in making your decision on dog use in the GGNRA. Another blatant disregard for the law is at the San Rafael Farmers Market. With posted signs throughout the Market areas stating "No Dogs Allowed", there are often many dogs there because their owners think those rules don't apply to them.

"Dogs, if off leash, must be under voice control". Most dog owners think this means that the dog should be able to hear the owner if the owner screams. More often than not the dog is not under control and the dog does as it please. It is not the dog's fault, it is the owner that has not properly socialized or trained their dog to follow commands. Here again if there is someone of authority in view the leash suddenly appears.

I have witnessed dogs jump deer and chase them for long distances as the owner, if they see the dog, yell at the dog with no change of behavior. Bird dogs have a natural instinct to sense birds and flush them and often the dog owners think this is cute.

Small children seem to be a magnet for dogs. The dogs want to approach children and I have seen many times where the child is terrified of the dog all the while the owner is yelling "the dog is ok". The dog is not ok as far as the child is concerned. As an adult I don't want strange dogs approaching me. I have had dogs jump up on me when on a muddy fire road all the while the owner is yelling "the dog is ok". Well it was not ok for the dog to put it's muddy paws on me. Or a dog coming up and lick your hand, to me that is dog spit and I don't want it on my hand.

While hiking I have seen, and also have had, a large dog come up from behind me, with out hearing it, and have it startle me. Sometimes the owner thinks it is funny all the while saying "the dog is ok".

Another observance of lesser occurrence is dogs allowed to run in sensitive areas that are posted "no dogs allowed". The dogs are often running ahead of the owners and are into the sensitive areas before the owner even knows it.

In the January 15, 2011 Independent Journal Newspaper, center of the front page, is a picture and accompanying article about a gentleman walking 8 off leash dogs on Muir Beach in the GGNRA. It is hard to believe that this man has all eight of these dogs under voice control at all times. Not to mention

that he picks up after all the mess these eight dogs create.

Upsetting is coming back from a walk to where you have set up to picnic at the beach and find that a dog has peed on your backpack.

Dogs are like members of the family for most dog owners and they get a lot of enjoyment from them. But they are animals and do not deserve to go everywhere their human owners can go. After having many encounters with off leash, poorly socialized dogs, my belief is that dogs should be on a leash anytime the dog is not on the dog owners property or in a dog park designed for running dogs off leash. They should not be off leash in common areas where other humans are.

If the GGNRA is going to allow dogs to run in some areas, I think there should be a fence designating where the dogs are allowed off leash as most dog owners "stretch" the boundaries.

Thank you for allowing input from the public.

Correspondence ID: 473 **Project:** 11759 **Document:** 38106

Received: Feb,01,2011 13:37:41

Correspondence Type: Web Form

Correspondence: I applaud the National Park Service for completing this comprehensive proposal for dog management in the GGNRA. I was born in San Francisco and now live in Marin County and spend the vast majority of my free time on the trails and beaches in the GNRA. The lack of a clear dog policy in the park has damaged park resources, negatively impacted wildlife, and caused a great deal of conflict between park visitors.

I strongly support the GGNRA Draft Dog Management Plan's preferred alternatives in all 21 of the areas that were studied.

I'm a dog lover but I also love the native wild animals and plants that continue to survive in the GGNRA. The GGNRA Draft Dog Management Plan presents a balanced approach. The fact that the Bay Area is home to so many passionate dog owners should not mean that the NPS accepts the unreasonable demand that all areas of the park be open to dogs, or the unreasonable argument that the needs of dogs outweigh the needs of wildlife. The preferred alternatives strike the best possible approach by allowing dogs to run free in the areas where they are least likely to cause damage, allowing them to be leashed in more sensitive areas, and restricting them from areas that are critical sanctuaries for native species.

I became a father last year and my young son smiles at every dog he sees.

He loves to be licked, nosed, and batted by wagging tails. But he also loves birds and has quickly learned that the best way to observe them is NOT to chase after them. I took great joy in pointing out a snowy plover to him recently. I'd like him to be able to do the same for his children. For that to happen, the preferred alternatives in the GGNRA Draft Dog Management Plan must be enacted.

Thank you, Michael Roberts

Correspondence ID: 474 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 14:35:49
Correspondence Type: Web Form
Correspondence: I believe that the use of the GGNR area would benefit from option C. It seems the most fair and balanced to everyone. The leash law should always be enforced. I believe that people should be able to use the GGNR to walk their dogs, but on leash always. My dog was attacked by a dog that was walking without a leash, on "voice control" and he had to be euthenized as a result of the severe injuries. Anyone walking their dog in public should be controlling it with a leash. The only exception should be a designated, enclosed dog park. To not use a leash is irresponsible, reckless, and immature. Everone thinks that they "know" their dog and it's capabilities....this included the woman who owned the dog that killed mine. The truth is, we are never going to be 100% sure of any animal's behavior. Why not save the GGNR area's time and money from dog litigation so that they can use it to conserve and improve the existing parks for our future. They are trying to keep the parks going in a time where goverment/tax dollar funding is slim...why can't we all be adults and clip on the leash.

Correspondence ID: 475 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 15:25:11
Correspondence Type: Web Form
Correspondence: I would like to know what problem we are trying to solve. if we are trying to protect wildlife Crissy Field is a good example of an area where dog owners respect the section that is set aside for birds. Why not make areas for dogs and areas for protected wildlife as necessary.

Correspondence ID: 476 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 16:29:11
Correspondence Type: Web Form
Correspondence: I appreciate all the work that has gone into this document and the concerns

about managing wildlife while balancing the needs of dog owners. We live in Marin County and thoroughly enjoy being outdoors hiking with our dog and walking on the various beaches that are currently open to and available for dogs and their families. It is an experience that is healthy for dogs and human and contributes to less stress in a time when there is too much that adds stress to our lived. There are already many, many places in Marin County where it is not possible to walk or hike with a dog. The places that are available offer wonderful opportunities for personal health and wellbeing for both dog owners and non-dog owners.

I urge you to not change the rules and regulations in Marin County and keep the access as outlined in Alternative A (the current situation) in this area.

Dog owners who enjoy these special areas are largely responsible people who care about and respect the environment and the rights of others who are also enjoying these areas. It would be better to increase signage and educational outreach in these areas so that both people with dogs and those without dogs can be made aware of their responsibilities in these wonderful areas.

It would be a great loss to adults, children and their dogs to not be able to enjoy the freedom and relaxation of our wonderful beaches and trails if the preferred alternative is adopted.

Correspondence ID: 477 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 17:28:27
Correspondence Type: Web Form
Correspondence: Hello, I would like to strongly urge you to set aside an area of the Ranch Tierra land in Montara for off leash dog walking. Not all of it. Maybe the area from the beach to Tamarind St., behind Farralone View School. People have been walking dogs there for decades, with few problems, and a local dog group self polices the area, including garbage cans and bags. You have stated you want all people to enjoy the area; bikes, horses, people. Does that include people walking dogs? If you designated just that area for off leash dog walking, wouldn't that protect all the other areas, and types of use? After all these years, with no problems, are you now going to exclude 1 group of people? Tom Moore

Correspondence ID: 478 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 17:45:40
Correspondence Type: Web Form
Correspondence: Dear Park Officials,

Concerning dog accessibility plans for Rancho Corral de Terra in Montara, California, I would like to voice my support for continuing to have both leashed AND off leash access to the trails. I have lived on the coast for 11 years and have walked extensively on the trail system during that time - mostly without a dog (and never was that a problem). We have only had a dog for 2 years. During those 11 years I have witnessed neighbors getting to know each other while walking - because of their dogs! I think banishing dogs from the parks completely will only serve to put up bigger barriers between people in the neighborhood. In a place here on the coast that has maintained its "small town" appeal, it seems excessively regulated to banish dogs from our parks. Let's make room for dog owners and non-dog owners alike to enjoy our natural resources.

Thank you for considering my opinion and look forward to supporting your positive response!

Correspondence ID: 479 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 17:46:50
Correspondence Type: Web Form
Correspondence: I support the dog management plan proposed for Muir Beach.

Correspondence ID: 480 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 17:47:57
Correspondence Type: Web Form
Correspondence: I moved to San Francisco almost 10 years ago from the mid-west. I've known that I wanted to move to San Francisco for almost 10 years prior to moving here. Two of my favorite places to visit was Fort Funston and Ocean Beach where I always found locals with their dogs. Every visit I found myself stopping by both areas if even for a short time to watch the action knowing one day I would be a part of it. This was fairly influential on my decision to move to San Francisco.

When I did finally move here I started my own consulting business and found myself traveling to Southern California more often than I was actually in San Francisco. When I was finally home and I wanted to feel connected to the City I would spend my Sunday morning at Chrissy Field, Fort Funston, or Ocean Beach again watching the human-canine interaction. There is no where in the world quite like these three areas and it makes San Francisco truly special to have such places.

Now, obviously, I am a dog lover, but I spent many a weekend morning at all three of these places. I never had a bad experience with a dog or a dog owner. In 2009 I finally was at a place in my life where I could get a dog.

Since then I have spent even more time at each of these places and again have never had a bad experience with a dog or a dog owner. I also spend a lot of time in fenced in dog runs. There I have had numerous bad encounters with dogs and dog owners. I have encountered dogs who do not respond to their owner's voice commands. I have witnessed dog fights when the parks are too packed with dogs and the crazy energy drives the frustrated dogs into a frenzy. And I have also found myself playing with dog or two who seemed to have no owner; owners will actually drop their dog off at the enclosed park and spend their time in their car listening to music or talking on their mobile phone. So, yes, I do agree that there are many irresponsible dog owners in San Francisco. However, I would argue that the less responsible of an owner you are the less likely you take your dog to one of the large off-leash GGNRAs. The dog owners who are attracted to the off-leash areas are there to share an experience with their dog. Yes, I am sure that there are irresponsible dog owners who frequent the GGNRA. However, why would you punish all of the responsible dog owners just to control a handful of irresponsible dog owners?

It may be a little presumptuous of me, but I have a hunch I spend more time in one of the GGNRA areas than most San Franciscans. I would actually wager a guess that dog owners frequent Chrissy Field and Fort Funston more often than other residents. The more Bay Area residents visit these beautiful areas the more they will want to protect them. I would also guess dog owners are more likely to support the efforts put forth by GGNRA. When areas are reasonably put off-limits to protect wildlife I would respect that as do most of the other law-abiding rule following dog owners. I want these areas maintained and beautiful for generations to come. There just has to be a reasonable balance between conservation and recreation. I think one key to remember is within the name itself GGNRA - Golden Gate National Recreational Area. These are Recreational Areas near one of the most densely populated urban areas in the US. The NPS needs to work with the City's residents to establish the best use of these areas not dictate the use as though they were in some remote less accessible location.

The NPS has already increasingly limited the areas of the GGNRA where voice control off-leash. Please do not limit them any further. The GGNRA has vast amounts of land where no dogs at all are permitted. I have yet to see anything put forward by the GGNRA which would provide reason to limit them further at Chrissy Field or Fort Funston. Please leave these two areas as they are. If there are portions of these areas which need to be protected, protect them reasonably and allow the residents who have been using some of these areas for decades to continue using them as they have.

Correspondence ID: 481 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 21:57:37

Correspondence Web Form

Type:

Correspondence: After recently becoming *certified as a dog walker through Dog Tec Dog Walking Academy, I strongly urge GGNRA to REQUIRE that dog walkers walking dogs off leash be certified. I do not work as a dog walker -yet- nor have I ever, but I went through the training because I want to be a professional dog walker who knows how to handle a small pack of dogs properly.

As a dog owner myself, I am constantly angered by the lack of professionalism and unsafe practices I see happening with many dog walkers. I recently interviewed with a very successful dog walker of 8 years and was appalled by his practices which are commonplace in San Francisco. There should also be a limit of 6 dogs maximum per pack. Safe dog walking demands technical skill, in-depth knowledge of everything from dog behavior and pack management to canine first aid and trail etiquette.

Before taking such a drastic measure as requiring all dogs to be on leash, consider a far better solution such as certification. I am certain that adopting such a requirement would drastically enhance quality of professionals who must respectfully share the trails, beaches and parks with other people and dogs, with safety as a primary concern.

Correspondence 482 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,01,2011 22:43:43

Correspondence Web Form

Type:

Correspondence: I support the National Park Service's preferred option for dog management in GGNRA. Arrogant dog owners with unruly dogs have taken over public lands throughout California, to the detriment of wildlife, endangered species, and park visitors. My personal preferred alternative is to allow no dogs in GGNRA lands, or, barring that, option D, which is the most protective alternative listed in the Dog Management Plan. Given the well-organized and vocal dog owners groups, however, it is unlikely that a "no dogs" alternative is in the offing. Therefore, I support the NPS Preferred Option as the best practical alternative.

Correspondence 483 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,02,2011 03:12:00

Correspondence Web Form

Type:

Correspondence: Please keep Fort Funston as a dog-friendly/leash-free space. I am a responsible dog owner and my favorite thing is to walk at Fort Funston with my two dogs. Thank you Jenn Bowman

Correspondence ID: 484 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 10:50:15

Correspondence Type: Web Form

Correspondence: I am writing to protest the impact of the GGNRA Dog Management Plan/EIS on Rancho Corral de Tierra (the 4200+ acres of open space from north of Montara to El Granada.) As a member of Montara Dog Group, I am requesting your consideration and support on this issue.

Rancho Corral de Tierra was not a part of GGNRA when this report was prepared, so it falls under the category of "New Lands." Many (five) recommendations are available regarding the issue of sharing trails with dog owners, however the report finds in favor of Alternative D (no dogs allowed) because the property is a new GGNRA acquisition.

I request that Alternative E be the preferred alternative. Alternative E states that "New lands begin as 36 CFR 2.15 (dogs allowed on 6 ft leash) and new lands with existing off leash use before acquisition may also be considered for voice and sight control in the future." This alternative is much less restrictive than GGNRA's current preferred alternative, Alternative D.

I currently walk my dog once a day, on leash, and off leash when it is safe to do so, and have done this for the last 8 years. My neighbors have been walking their dogs on Rancho trails for decades. We are respectful of equestrians, cyclists, as well as walkers without dogs whom we meet on the trails, and leash our dogs when it is appropriate. Dog-waste management (disposal cans and pickup bags) is maintained by Montara Dog Group volunteers. Rancho supports a mix of users that works. We currently share trails, get along, and self-police. Rancho could be a model for what's being done right and how disparate user groups can co-exist.

No scientific studies have been done of Rancho lands to justify banning dogs. Neither fenced or patrolled, trail conditions are excellent given their heavy use. A complete ban on dogs is extreme. GGNRA's preferred alternative for the Rancho is not truly multi-use. Even though hiking, mountain biking, and horseback riding will be allowed, no area is set aside for dog walking. Creative, multi-use solutions have not been considered. For example, locations in Washington state and Santa Cruz set aside early morning hours for off leash dog walking; then starting at a posted time, all dogs are required to be leashed.

Off-leash options areas are allowed in Marin and San Francisco counties, Rodeo Beach, Crissy Field, & Fort Funston. No off-leash options areas are

offered in San Mateo county GGNRA lands.

The preferred GGNRA alternative will have a negative impact on our community's lifestyle and culture. Residents have socialized with their dogs in this area for the last 50 years. We have no community center or public park. Montara residents will be forced to drive to small parking lots at McNee Ranch or Montara Beach, and cross busy Highway 1 with their dogs, in order to access McNee Ranch, formerly a 10 minute walk through Rancho. Even more dangerous, Montara residents may elect to walk along Hwy 1 for 1/4 mile (there is virtually no shoulder on this stretch of highway) to get to McNee Ranch. A man walking his dog along this route was recently hit by a car and severely injured. His dog was killed. If dogs are banned from Rancho, hundreds of dogs will have to be walked on narrow rural streets with no sidewalks.

I believe this restrictive approach is not justified and request your attention and support in addressing this unfair, patently easy, blanket approach to mandated use of Rancho lands. Our voices should matter, and in a democracy, community input should help shape policies.

I thank you for your consideration and look forward to your response.

Sincerely,

Susan Verlander Montara Resident and Dog Owner

Correspondence ID: 485 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 10:51:33

Correspondence Type: Web Form

Correspondence: I have been hiking the Miwok and Coyote Ridge Trails for over 20 years and during that time I have seen a major increase in dogs off leash, both in "leash only" and "no dog" areas. The biggest violators, in my book, are the owners that allow their dogs to run off leash on the Coyote Ridge Trail, which is a "no dog" area. This happens on a regular, daily basis. The dog owners who live in the surrounding neighborhood that borders the GGNRA use the park as their own private backyard and ignore the rules, even though signs are posted everywhere. The rules are not for them, thank you very much. I have been jumped by dogs who are off leash, I have witnessed encounters between dogs and mountain lions/bobcats...believe me, the dog loses that battle, and I have seen them running rampant, running through brush, chasing rabbits, and digging up mole/vole holes. AND, not a park ranger in sight. Ever. Where is the enforcement? Rangers on mountain bikes on any sunny Saturday or Sunday afternoon would be easy pickings for citations and (hefty) fines. I fault the park rangers as much as the dog

owners. There needs to be better enforcement because I do not see the attitudes of the dog owners changing.

Correspondence ID: 486 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 11:39:57

Correspondence Type: Web Form

Correspondence: Please, please, please keep Muir Beach and other areas dog-friendly!

We recently moved here from Minnesota where our dogs couldn't be outside for almost 4 months out of the year. MN also has incredibly strict leash laws, etc. so our dogs could only go to dog parks to play and socialize. One of the reasons we were so excited to move back west was because of the great opportunities for us to be outside all year round with our pups!

We go to Muir Beach at least once a week and always have an amazing time meeting other dogs and dog owners, residents, kids and the elderly. Everyone shares the beach and there is mutual respect between non-dog people and dog people. I see dog owners with their dogs under control, cleaning up after them and most importantly, having fun with them!

The preferred alternative D is the most restrictive of all! California is known to be extremely dog-friendly and this option would be a complete reversal of what everyone who lives here has come to know.

PLEASE KEEP MUIR BEACH DOG FRIENDLY!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Correspondence ID: 487 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 13:20:18

Correspondence Type: Web Form

Correspondence: Dear GGNRA, I am greatly dismayed that an area I have hiked with my dogs off leash since 1976 is now being considered as a leash only or no dog area. I'm referring to the area behind Coral Reef in El Granada. Over the years, on the coast and in the Bay Area, dogs have been banned or required to be leashed in areas that were once free areas to us dog owners. These include the state beaches, the schools, the parks, the ball fields. On the coast, the only areas remaining for dog walking, hiking and exercise off leash have been a few of the bluffs and the hills. The area GGNRA is now considering is not easily accessible to the public, mostly a neighborhood, locally known area. It has very steep hills, often overgrown trails and a lot of it requires a good pair of legs and lungs. I really don't foresee an upsurge in use. Restricting or banning dogs would, in effect, take away the privileges of the most prevalent use of this area for the past 30-40 years since I've lived on

the coast. All of us locals walk our dogs and give them a chance to run free in this area daily. When I lived in this neighborhood in 1985-1995, I walked my dogs twice daily there. It's quiet and well protected from the neighborhood, roads and highway. Dog walkers do not harm anyone there. Most people just don't go there. It's too tough of a climb. Over the years, I've run mostly into other dog walkers, very nice people with well behaved dogs just out for exercise. When I've spotted hunters, where they don't belong, or off road motorcycles, when they are forbidden, or homeless building encampments, I have reported these things to the local sheriff for investigation. Dog walkers, like myself, take care of this area and don't want it vandalized or set on fire by sparks from motorcycles or campfires by homeless. If you take this away from us dog walkers, and make it ridiculously restrictive by requiring leashes when the area is huge and wide open with nothing or nobody to harm, where can we now go? What is left to us? The quality of life on the coast will be diminished for so many of us. In a time and era that appears to be unfriendly to dogs, it devastating to those of us who survive because of our pets and the exercise we get with them and the pleasure we take in them running without a six foot leash to find ourselves banned from yet another open space. We can't walk beaches anymore. We can't walk anywhere except down Main Street with all the traffic and shoppers, on a leash with our pooper scooper bags! I urge the GGNRA to allow the traditional uses of this area to continue; and, at least, give it a chance to work. I've run into horseback riders before without any problems. It seems so drastic and unnecessary a step to just shut down the area to us dog walkers. If we can't walk our dogs there, then, in effect, we can no longer use this space. Few people have the energy to walk their dogs on leashes where allowed and then go for a big hike afterwards. It just wouldn't be fair to a lot of people, including the neighborhood and the locals. Plus, the area is remote and having one's dog along feels safer. It's been an off leash area for the past 40 or more years since I've been hiking that area, and I've yet to know or hear of any problems with the dogs or their owners there. I think it's important to assess each and every open space that the GGNRA operates on the basis of it former uses, its uniqueness and not impose severe restrictions that will only harm so many outdoor people who love the area and are dog owners.

Thank you for your deliberate and fair consideration of this issue!!!!

Sincerely,

Glenna Lombardi Dog Walker of Many Years Proud Supporter of Animal Rights The Humane Society The American Society for the Prevention of Cruelty to Animals

Received: Feb,02,2011 13:44:59
Correspondence Type: Web Form
Correspondence: Please keep Muir Beach open to dogs. It is a magical place for families and their canines to enjoy the majesty of our area.

Correspondence ID: 489 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 14:32:39

Correspondence Type: Web Form

Correspondence: I feel sorry for dogs, who cannot possibly have a truly doggy life in a city (nor can humans have a truly human life in a city). But there is a general principle behind democracy: the weak must be protected from the strong, in order for justice to prevail. In this case, the weak are our native wildlife (plants, as well as animals). The wildlife **MUST** be given top priority, because they can't protect themselves from us, nor from our artificially subsidized pets. Our subsidized pets have no place in our wildlife habitat, including our natural parks. Ideally, wildlife should be left alone, or they won't survive.

There ought to be areas of habitat that are off-limits to all humans. Human access to wildlife habitat should be kept to a minimum. The same goes for pets, which are exotic species that don't belong there. **AT A MINIMUM**, dogs should always be required to be on leash, held in check by their owner. Otherwise, **REGARDLESS OF WHAT THE DOG OWNERS PROFESS**, dogs will obey their natural instincts and chase the wildlife.

Correspondence ID: 490 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 14:32:53

Correspondence Type: Web Form

Correspondence: Dear Sir: I do not own a dog so I have no axe to grind. However I would like to note the situation on the Tennessee Valley Trail from the horse ranch to the ocean. I have walked and run this trail for over 30 years (I am in my 77th year) when there used to be cattle all the way to the sea. It has never made sense to me that dogs are prohibited on this section of the trail and yet permitted on the pacific coast trails which are infinitely more harmful to wildlife than the T.V. trail. The Tennessee Valley Trail could not be busier on occasions than Times Square, with cars, trucks, horses and people all using this trail. For heavens sake where is the harm to wildlife on this trail with leashed dogs as compared to the pacific coast trail which in many cases travels a narrow rural area where there is a lot of wildlife. I have over the years written letters to the chief ranger on this subject without any effect at all. Since I work for Alameda County I am well aware of the inertia of

bureaucracy at effecting change however reasonable the arguments may be, I really do not expect any result from this letter, but hope springs eternal.

Sincerely

Howard Johnson A.I.A. R.I.B.A.

Correspondence ID: 491 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 14:48:27

Correspondence Type: Web Form

Correspondence: I'm a San Francisco homeowner and dog owner. I see the devastation that large numbers of dogs are having on our city parks and GGNRA areas. I have visited Fort Funston, Sutro Heights, Crissy Field, Baker Beach and Ocean Beach with my dog over the last 18 months. There are simply too many dogs for too little space in the city. I believe that anything more than sensible restrictions in ecologically sensitive areas will simply make the problem worse in the remaining areas, increasing the number of conflicts, requiring additional personnel to patrol and remediate these effects. Further, in these tough economic times, many people have taken up the occupation of "dog walker". Those residents that can afford to pay dog walking services (myself not included) are stimulating this occupation that is providing a livelyhood for many. Some of these dog walkers are very responsible, others are not. Therefore, I would recommend a new solution as follows: 1. Designate and completely restrict areas that are truly environmentally threatened 2. Keep current policies in place in other areas - there's no staff/money to enforce changes 3. Charge an entry fee for all GGNRA parks where dogs are allowed, \$1 per dog up to 3 dogs, then \$2 for each additional. (walkers are getting \$25 - 35 per dog, this is a tax deductible cost of doing buisness) 4. Create jobs for underprivlged youth supplemented by court ordered community service to collect entry fees, work as 'doggie valet', and work on environmental remediation efforts. Fort Funston alone could generate thousands of dollars per day.

Correspondence ID: 492 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 14:57:47

Correspondence Type: Web Form

Correspondence: Hello,

My girlfriend and I regularly walk our dog at Fort Funston. This is a great off leash area for dogs, and I feel it should remain this way.

First, there does not seem to be a huge public demand for Fort Funston to be

dog free. Virtually everyone there is there with a dog (maybe a few runners, but most of them are with a dog as well). I have never seen anyone their act disrespectfully and virtually everyone is responsible when it comes to cleaning up after their pets.

There are very few safe places to take our dog. Dogs, to many of us are akin to a member of the family. There are already lots of places in San Francisco where kids and families can run around and play together. Fort Funston is one of three places in San Francisco where I feel safe letting our dog off leash (Stern Grove and a park at 8th and Lake are the others). It also provides the people of Daly City, who also have surprisingly few safe dog parks with a place to exercise their furry friends.

Thanks,

Rory Dowd

Correspondence ID: 493 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 15:24:53

Correspondence Type: Web Form

Correspondence: It is important to me that Fort Funston remains as it is. There is no other place where we can take our dog for a walk off leash. There are many other beautiful places in the Bay area for people to take walks and enjoy nature without dogs, but Fort Funston is one of the few places were we and bring our dogs and let them run free.

Our dog is a part of our family and it is important that there is a place for her to enjoy a little freedom.

Correspondence ID: 494 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 15:56:14

Correspondence Type: Web Form

Correspondence: Contrary to the opinions of conservationists, dog owners do their part for the environment. I go to Rodeo Beach about five days a week where I meet other dog owners. While the dogs enjoy the exercise and each others' company, a friend and I pick up trash. I calculate that over the course of a year, we remove about half a ton of trash from the beach, mainly plastic that can cause marine and avian creatures sickness and sometimes death. Besides turning a beauty spot into an eyesore.

Our efforts make the beach a more beautiful experience for everyone, dog owner or not. I realize that the main part of Rodeo Beach is not on the list

for closure to dogs, but closing the south part of the beach makes no sense. Especially in the early morning, the south beach is almost solely used by dog owners. When the tide is low enough to permit access to the southernmost part of the beach, we focus our clean-up efforts there, sometimes filling our garbage bags to overflowing with all kinds of trash. And the dogs love running on the wide open stretches of sand.

In all the years I've been enjoying Rodeo Beach's southern extension, I have only seen dogs and humans getting along just fine. So even if it meant restricting the access time - say, Dogs Allowed from Sunrise to 11 am - that would make much more sense than an outright ban. And a total ban would probably inhibit our trips to Rodeo Beach, reducing the number of trash pickups. Not a good thing for the environment.

Correspondence ID: 495 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 17:39:42

Correspondence Type: Web Form

Type:

Correspondence: I'm writing to support Alternative D in the areas under discussion. Though seemingly "balanced", the multiple use alternative has too many areas open to dogs on leash. Since leash rules in the GGNRA are currently completely ignored and unenforcable, the "balanced" alternative throws much of the area open to uncontrolled dogs.

Dogs currently affect the visitor experience in the GGNRA more than most other impacts. In certain areas - such as the beaches along Chrissy Field - there is an almost constant interruption to visitors by unleashed dogs not trained to voice. This area is essentially denied to any quiet uses of the beach.

As well, the GGNRA is supposed to protect natural values as well as allow for public use. Ground-nesting birds and marine mammals are being extirpated from most of this stretch of coast, and dogs play a major part in that impact.

Please consider that the GGNRA, as America's largest urban protected natural area, is to valuable to simply sacrifice as a dog toilet and playground. Thank you for considering my opinion.

Correspondence ID: 496 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 18:03:14

Correspondence Type: Web Form

Type:

Correspondence: I strongly support the proposed plan. I am a dog owner and I think that dogs

should only be off leash in designated areas. Personally, I would take it a step further and require that dogs ONLY be allowed off-leash in FENCED OFF areas. But I think this proposed plan is a good compromise.

People should not have dogs if they are not willing to take the proper steps to make sure the dog does not adversely impact our environment or fellow citizens. People should understand what breeds of dogs require a lot of running and if they want a dog that needs lots of exercise and running they should be understand that they will need to take their dogs to very specific places to run off leash.

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| Correspondence ID: | 497 | Project: 11759 | Document: 38106 |
| Received: | Feb,02,2011 19:04:13 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Please keep the GGNRA dog-friendly. Dogs are an important part of American families and communities. | | |

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| Correspondence ID: | 498 | Project: 11759 | Document: 38106 |
| Received: | Feb,02,2011 19:42:16 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | The off leash areas in San Francisco, especially Fort Funston provide critical outlet for exercising and socializing dogs in the Bay Area. I have driven across the country with my dogs and not encountered anything like Fort Funston. With two large sporting dogs, it is very difficult to keep them adequately exercised without acres of space for them to roam off leash. Fenced areas, even one acre of land are not enough. They are intelligent animals who get bored just as humans do of roaming the same small area day after day. San Francisco off-leash areas need to be maintained exactly as they are if they are not expanded. They also provide important opportunities for pet owners to socialize. | | |

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| Correspondence ID: | 499 | Project: 11759 | Document: 38106 |
| Received: | Feb,02,2011 20:01:37 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I think that making laws after laws after laws is beginning to take a toll on people's freedoms. This is not sensible legislation and hurts the very animals that we all adore. | | |

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| Correspondence ID: | 500 | Project: 11759 | Document: 38106 |
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Received: Feb,02,2011 20:04:32

Correspondence Web Form

Type:

Correspondence: This is a first for me. I don't often get involved, I don't often protest, and this is my first comment on the mess that is about to happen.

This makes me very sad. I am (was) a big supporter of the Park Service. I participate in beach cleanups, vote whenever funds for parks are involved, and have always felt privileged to live where we are blessed with wonderful urban parks.

I am a regular at Fort Funston, as are thousands of others. Relegating responsible dog owners to the meager area in this report will hurt the land within the park as it will be overrun. Dogs will go somewhere, so it will hurt other city parks and urban areas. Lastly, it will hurt the Park Service.

So much money and effort was spent against a clear public will, which could have been sorely used to pay for more rangers (or give them a decent wage) and improvements.

Yes, I will protest...supporting lawsuits and political candidates.

Yes, I will vote...the National Park Service seems like they have too much money, if \$900K can be squandered like this.

No, I will no longer support you guys. This is a nicely organized railroad attempt which will cause myself, and many others, to think differently. This makes me very sad.

Correspondence ID: 501 **Project:** 11759 **Document:** 38106

Received: Feb,02,2011 22:23:38

Correspondence Web Form

Type:

Correspondence: I am a San Francisco resident and frequent visitor to the GGNRA, most frequently the Presidio. Other parts of the GGNRA that I visit on regular basis are Ocean Beach and Fort Mason. I support the general direction of the proposed policy change, because it would improve visitor safety and reduce user conflicts. The policy is also finely tailored, and responsive to the individual circumstances and priorities in dozens of specific locations across the GGNRA.

This policy change is important to me because of some of the problems I have experienced in the park. I visit the park to take part in programs and experience the natural environment. I consider these programs as a vital part of my life, and important to my overall health and enjoyment of life.

However, when these programs occur in certain areas, there are sometimes large packs of dogs running off leash. The dogs sometimes approach me and jump on me, and interrupt what I'm doing. Sometimes it takes some time before the guardians arrive to get the dogs away. The dog guardians walk about yelling the names of the dogs, attempting to keep them under voice control. Sometimes, when walking through an area of the park, I have stepped in dog feces left behind by the dogs' guardians. All of these occurrences are detrimental to the overall experience. They also place me in conflict with the dog guardians, a situation that I would prefer to avoid.

Correspondence ID: 502 **Project:** 11759 **Document:** 38106
Received: Feb,03,2011 05:16:56
Correspondence Type: Web Form
Correspondence: Hi,

I feel this is unfair to the general public who have enjoyed Fort Funston for over two decades to be able to take their dogs to an authorized No Leash park. I also feel it is UNFAIR to the Professional Dog Walker and their clients who utilize both these services. WHY THE CHANGE NOW?. If you make an enclosed dog park at Ft Funston you will Definately have Major dog fights!!. Dog like people don't like to be pend up and stressed out!! this causes dog fights!!. DOGS need to be able to run free under Voice control which would cause NO friction between dogs. DOGS have rights too!! DON'T TAKE AWAY DOGS FREEDOM TOO!!

DON'T MORE AMERICANS TO BECOME UNEMPLOYED!!

Thank you

Correspondence ID: 503 **Project:** 11759 **Document:** 38106
Received: Feb,03,2011 10:13:02
Correspondence Type: Web Form
Correspondence: Dear Mr. Superintendent:

My wife and I strongly oppose any changes to further restrict dogs from areas of the GGNRA. It's unfortunate that NPS has already wasted thousands of dollars and hundreds of staff hours on a flawed study and EIS statement. President Theodore Roosevelt was a champion of our National Park System and he would be ashamed of the direction that the GGNRA is headed by further restricting areas of the park to people and pets. What you need to understand is that by restricting dogs you are restricting people, too. This simple fact is not in the report--because the outcome was

predetermined by individuals who fail to understand and or recognize the serious impact it has on the park.

If the NPS wants support including funding from the public it should "wake up." The NPS is desperately under funded and faces more cutbacks in 2011-12. If this EIS and its recommendations are implemented you should expect less funding, support, and resentment from the public. Yes, the people behind the study will be happy because it has the potential to generate more revenue from it. President Theodore Roosevelt would have fired those in NPS who would even consider the utility of this report because of its absurdity. The GGNRA has wasted enough time and money on this matter. Drop it now! ReFocus on the improvements that EVERYONE can benefit from and you will see your budget increase, volunteerism, and support. Lastly, Abraham Lincoln said new laws/regulations are nothing but good advice, if not enforced. Fact, the NPS and GGNRA do not have the resources or public support to enforce new regulations.

Regards,

Nick Torres

Correspondence ID: 504 **Project:** 11759 **Document:** 38106

Received: Feb,03,2011 11:17:44

Correspondence Type: Web Form

Correspondence: I am writing to express my concern about the new GGNRA Dog Management /Environmental Impact Statement (DMP-EIS) plan to exclude all dogs from "New Lands" which would apply to POST's Rancho Corral de Tierra property. I am requesting that this land be managed under Alternative E (allows dogs) rather than Alternative D (bans all dogs). I live in Montara and have been walking my dog in the open space next to Montara and Farallone View School for many years. It is a wonderful community of hikers/walkers, mountain bikers, equestrians and dogs who for decades have shared the land and treated each other with respect and courtesy. There is a dog group that manages dog poop stations and has developed guidelines for owners who walk with their dogs off-leash. For the decades of use and the large number of people who access it (including dog walkers), it is a testament to the care and concern of the community that the land, water shed and wildlife are remarkable well kept and thriving. I was very upset to see that GGNRA has decided, without inputs from the local community (other than one meeting at Farallone View where the majority of the people spoke overwhelmingly in favor of allowing dog access), to ban all dogs from the property. In my opinion, this is not only unjust to the local community and doesn't support the established mixed use (targeting for exclusion just one group), but is not founded on research or analysis. Does it make sense, and

is it safe, to force dog owners who want to access McNee State Park to either drive, trying to find parking on the highway, or walk half a mile on Highway 1, rather than walk across the old railroad grade or old roadway and trail from Montara? Are the pads of dog's feet more damaging to the terrain than horse's hoofs, hiker's boots or mountain bike's tires? My husband was a "volunteer of the year" for POST for his many hours of analysis of plant communities on various POST properties. He has led groups on the Rancho and ironically, he and other volunteers often brought their dogs with them. Aren't there many options available for this property, from defining areas where dogs can't go, to areas where dogs must be on leash (like McNee), to areas designated for dogs under voice control? Please reconsider your decision to ban dogs because, with this ban, you ban thousands of people from this land as well. This is counter to the idea of GGNRA and to POST's mission to preserve land for the community for multiple uses. Most of GGNRA land (and State and County parks as well) do not allow dogs. Given the unique nature of GGNRA's urban/park interface, the Rancho, with its established successful mixed use model, would be an ideal place to continue to allow dogs. It is important to have some percent of the park open to dog owners who make up a large portion of the local population. GGNRA is not only for the pleasure of overseas and out-of-state visitors but for the local community who support and care for it. Regards, Shelly Smith Montara, CA

Correspondence ID: 505 **Project:** 11759 **Document:** 38106

Received: Feb,03,2011 12:16:26

Correspondence Type: Web Form

Correspondence: I would like to vehemently oppose any of the proposed restrictions to off-leash dog walking areas in the GGNRA. I have read a good portion of the DEIS and feel it is an anti-dog manifesto disguised as an environmental issue. This is a National RECREATION Area, not a National Park. Specifically Fort Funston and Crissy Field are not pristine natural areas... heck, they're former sites of military encampments in a densely populated city environment. The current dog walking area was promised to us in the 1979 Pet Policy when the park was transferred from the City to the the GGNRA, and there is no legitimate reason to renege on this agreement. This is not about dogs having more rights than people... this is about people with dogs having rights. 1% of the total area of the GGNRA is a very small but precious patch to us... and i oppose ANY reclamation of this land... and i will take to the streets to protest any attempt to do so.

Correspondence ID: 506 **Project:** 11759 **Document:** 38106

Received: Feb,03,2011 12:42:06

Correspondence Type: Web Form

Type:

Correspondence: I am a Guide Dog user as is my daughter and several of our friends. When we go to any beach, either regulated by GOGA or San Francisco Maritime NHP, we have had some problems with dogs off leash. Our dogs are never left to run off leash, one because they are working dogs, and two, because it is unsafe not only for them but for us as well. It is very disconcerting when you have a dog, who is not on leash, running up to your dog, sometimes causing trouble, or just wanting to play, and distracting our dogs when they are trying to work. I have had several dogs lunge, growl, and snap at my guide dog, even those who are on leash, and it makes me very upset that their handlers don't seem to care. I am an employee of San Francisco Maritime National Historical Park, so spend some time at the Aquatic Park Beach and have has several run-ins with people who refuse, either to keep the dogs off the beach, or who are just letting them run around with paying much attention to what they are or are not doing. Having a good plan, which is safe for all, is something I look forward to.

Remember, wherever the public is allowed to walk, so are people who use service dogs.

Correspondence ID: 507 **Project:** 11759 **Document:** 38106

Received: Feb,03,2011 17:08:34

Correspondence Type: Web Form

Correspondence: Please keep these areas so dogs can run around off leach. A healthy dog needs to get its energy out and play just like kids and there are very few safe places that you can take your dog to enjoy the outdoors and run as it is. Thank you for your understanding.

Jacquie Rossiter

Correspondence ID: 508 **Project:** 11759 **Document:** 38106

Received: Feb,03,2011 18:19:31

Correspondence Type: Web Form

Correspondence: I like dogs and have a dog of my own and for several years have enjoyed walking the grounds of Rancho Corral de Tierra in Montara (I've lived here 20 years). However, I consider myself a responsible dog owner and keep my dog on a leash at all times. This is NOT the case for many others though (particularly the "professional dog walkers" that typically have packs of 3-7 dogs with them at a time). There have been many, many times when my dog and I have been approached by loose dogs and although my dog is friendly, it is the other dog(s) that sense something in her and react in an aggressive manner. Often, the owner is nowhere near or calling the dog without any

effect. Fortunately, we have avoided any serious injury, but it is frustrating to have my dog on a leash and controlled when it is the other dog that is off leash and the aggressor.

I also have a horse and enjoy riding in those same fields. Again, while mounted, I have been approached/charged by many dogs off-leash and their attitudes can vary from curious to aggressive because some have never seen a horse before. Several times, I have been swarmed by packs of dogs (again from the "professional dog walkers") who had no control over the dogs, but because my horse knew dogs and stayed calm, we were OK until she eventually called the dogs off.

It is frustrating and sometimes scary to be put in these situations where dogs are loose and out of control, but I don't want to exclude dogs from Rancho Corral de Tierra entirely. It seems to me that the best compromise is to have all dogs on leashes to make it safer for all of us - other dog walkers, equestrians, kids, etc. and perhaps stronger restrictions on these "professional dog walkers" that have packs of dogs with them. 4-7 dogs on that many leashes with one person is still not safe since the person can easily be overpowered. It may also be necessary to have someone out there regularly enforcing the use of the leashes because many of these dog walkers will not comply.

Correspondence ID: 509 **Project:** 11759 **Document:** 38106
Received: Feb,03,2011 19:42:46
Correspondence Type: Web Form
Correspondence: As a homeowner since 1986 at 1878 Great Highway, I have seen the return of the snowy plowver and an increase of dogs at the beach between Lincoln & Sloat. I am at the beach 3 times a week picking up trash and enjoying the ocean. My concern is the dogs off leash that run after the shore birds and the amount of bags of dog poop left where the owner dropped it. If your recommendations include prohibiting all dogs on all beaches, I will agree.
Elizabeth Foree

Correspondence ID: 510 **Project:** 11759 **Document:** 38106
Received: Feb,03,2011 21:26:52
Correspondence Type: Web Form
Correspondence: I live across the street (Great Hwy) from the beach and am VERY glad for these changes as proposed by the Dog Management Plan. I have owned dogs over the years and mine were NEVER left to roam neighborhoods without being on a leash at ALL times. It's a safety issue. I'm sure dog owners (some) will be up in arms about their dogs "rights" - which is an

insane idea from my point of view. As the dogs on the beach (or rather their owners) have stifled my right to walk safely along the beach without being barked at, snapped at, sniffed at and jumped on as their inconsiderate owners say, "Oh he/she won't bite!" Not to mention the dog shit I have to watch for. The problem, of course, are the owners. I have even had dog owners yell and give me the finger when I've asked them to please keep their dog on a leash and under control. I just hope there are enough reasonable people to make sure these changes go through. Of course enforcement will always be an issue and difficult, as there are "rules" already in place that aren't followed - which means "new" and more rules in the hopes of dog owners following them.

Correspondence ID: 511 **Project:** 11759 **Document:** 38106
Received: Feb,03,2011 22:46:04
Correspondence Type: Web Form
Correspondence: I disagree with any proposal that would restrict off-leash dog walking for dogs that are under voice control. Fort Funston is a wonderful place to bring a dog; I ask you not to change that.

Correspondence ID: 512 **Project:** 11759 **Document:** 38106
Received: Feb,04,2011 09:18:58
Correspondence Type: Web Form
Correspondence: Dear Frank Dean,

I have waded through this document, and like many others, I'm a little surprised how harsh it is toward dog owners and dogs in general. Certainly dogs can have a negative impact on the GGNRA environment, but this must be weighed against numerous dog owners who live in this city and love to exercise their animals in a natural environment. The recommendations here seem unbelievably harsh and simply anti-dog. An example of this is the Park Service's power to revoke all privileges on on-leash or off-leash walking if any of the restrictions are disobeyed. I can't imagine in any other instance that this would be acceptable to any citizen and tax-paying individual.

We give a lot of money to the GGNRA, to the William Kent Society, to Trails Forever. We attend meetings about the future of Doyle Drive and what's going on in our Presidio. One, but only one, of the reasons we do this is because we have a dog who loves the East Beach and it gives her and us great pleasure to exercise her in this beautiful environment. We use this area frequently for hikes and walks without the dog, too. The GGNRA is San Francisco's own treasure, and we must accommodate all the people who live

here, not just the few that are the loudest or most obnoxious (I'm speaking of dog owners too, by the way). Please accept this recommendation to revise this proposal to make it more palatable to the dog owners, and avoid an all-out war of "us vs. them." We give money so everyone can enjoy this national treasure, dog owners and non-dog owners alike; don't cut out the latter just because it may be a little more inconvenient for the rangers and the environmentalists. I am certain we can come to an accommodation that everyone can accept, not just special interests.

Yours sincerely,

Courtney Weaver

Correspondence ID: 513 **Project:** 11759 **Document:** 38106
Received: Feb,04,2011 09:53:56
Correspondence Type: Web Form
Correspondence: I commend the National Park Service for developing a plan to protect GGNRA sensitive natural habitat while allowing visitors and local residents ample opportunity to enjoy this magnificent park. I know that the Park Service will receive complaints from professional dog walkers and individuals who do not want any limits placed on where they can let dogs run unleashed. They are a well-organized and vocal group who will make their demands heard. Please know they do not represent those of us who value the National Parks for what they were intended to be-a place to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations. San Francisco has 17 off-leash areas where dogs can run unfettered. That certainly should be enough. People have always wanted to use the parks for their own selfish desires-whether sheepherders in the high alpine meadows of Yosemite or snowmobiles in Yellowstone. We need the Park Service to take a firm stance in preserving these precious acres for future generations. Thank you.

Correspondence ID: 514 **Project:** 11759 **Document:** 38106
Received: Feb,04,2011 10:08:00
Correspondence Type: Web Form
Correspondence: I disagree with the GGNRA Dog Mangement Plan because it is over restrictive and limits a very important dog walking area for tax payers who have dogs. There are hundreds or miles of National Parks and Ocean land for others to use and its unfair to restrict an already small area of off-leash dog walking for the many people who currently enjoy it with their dogs.

Correspondence ID: 515 **Project:** 11759 **Document:** 38106

Received: Feb,04,2011 12:35:51

Correspondence Type: Web Form

Correspondence: I am very blessed. Every morning my dog and I get up and before work, go hiking in the Marin Headlands, Crissy Field, or Muir Beach. Every day I see something that takes my breathe away. I feel safe out there alone walking as I have my dog with me. I have friends who hike with us as my dog makes them feel safe. I do not believe my dog would know how to protect me, but people walking towards me do not know that. It can be very scary to be out in the middle of nowhere and see a stranger walking towards you. My dog is either on leash or voice command. I have never encountered another dog that is aggressive nor seen dogs chasing wildlife. There are always rabbits, birds and coyotes. Every owner I meet out there is responsible and picks-up after their dog. I have given bags to people who forgotten them. We have helped other hikers who are lost or hurt. I climbed down and helped a women who slipped off a hillside. I have called 911 when I heard a domestic dispute in a home in Tam Valley. I always give at least one set of tourists on bikes directions to Golden Gate bridge from Crissy Field (you should consider adding sign posts). My dog and I do not harm the paths by leaving big horse prints, horse manure or bike ruts. I consider myself to be a responsible user of the parks. I volunteer to remove invasive plants and try to keep our beautiful parks pristine. If I was unable to take my dogs I would not hike in these beautiful lands. Many people I have met in the last few weeks agree that we would not be on the trails without our dogs. If you ban dogs I believe you will loose more than half the hikers on the trails. Please don't take away this beautiful privilege from us.

Correspondence ID: 516 **Project:** 11759 **Document:** 38106

Received: Feb,04,2011 16:24:37

Correspondence Type: Web Form

Correspondence: I support Alternative A, no change to dog walking requirements. I do have not a dog, but I appreciate how hard it is for dog owners to find spaces where their dogs can run. I take frequent hikes at some of the areas affected by this proposed change, and I enjoy the mixed human-dog environment. Any inconvenience to me is outweighed in my estimation by the benefit.

Correspondence ID: 517 **Project:** 11759 **Document:** 38106

Received: Feb,04,2011 16:44:16

Correspondence Type: Web Form

Correspondence: I walk my dog (often off leash) in various city parks as well as the GGNRA, usually Ft Funston and Chrissy Field. The cleanliness and concern of dog owners who bring their dogs to GGNRA by far surpasses those who use the SF city parks.

I am constantly stepping in and around dog waste in parks because dog owners see those spaces primarily as their dogs toilets. However the GGNRA is different in that it is used for exercise and enjoyment, and dog owners appreciate the pristine land that we are privileged to call our home. At Ft Funston this morning, I saw a dog owner picking up another dog's waste. People care about that space and allowing dogs there, off leash and on, will encourage it's use and appreciation. It will be a sad day when Ft Funston is deserted because people can no longer bring their dogs there. I assure you that will happen.

If conservation and restricting dogs to certain areas is of the utmost importance, perhaps it is just a matter of signage. There are so many broken fences along the upper part of Funston that it is difficult to tell where dogs are allowed and where they are not. As a first step, clearer rules and signs are needed.

I urge you to consider the voices of perhaps the majority of users of the GGNRA and allow off-leash and dog-friendly areas to remain as they are.

Thank you

Correspondence ID: 518 **Project:** 11759 **Document:** 38106

Received: Feb,04,2011 18:05:28

Correspondence Type: Web Form

Type:

Correspondence: I am a dog owner and use Crissy Field to exercise her quite often. I think that carving up that area into on-leash and off-leash areas would wreck the space and create more confusion. To that end, I think that the alternative map, Map 10A, is preferable. There aren't many off-leash areas like Crissy Field, with its large area and easy accessibility. This latter point is especially helpful for elderly dog owners and people with babies or children (like me). And what is so special about Crissy Field anyway? It is an old airstrip in the middle of a Superfund site. The dunes and marshes are already protected by fencing; the beaches are already seasonally protected for bird nesting. What do you hope to achieve for wildlife (the purported reason) by carving up Crissy Field itself? Preserving the weeds? Protecting the huge population of pocket gophers?

I can't help but feel that you are picking on dogs in particular and using them as scapegoats for the many human users of Crissy Field who treat the

area irresponsibly, not just dog owners. I would like to see you impose (or enforce existing) rules about setting off rockets and flying kites, both of which often land in the dunes or on other people.

Correspondence ID: 519 **Project:** 11759 **Document:** 38106
Received: Feb,04,2011 19:41:03
Correspondence Type: Web Form
Correspondence: Hello, I write to you to register my strong opinion of allowing dogs to be off leash, including at Muir beach, Crissy fields and Fort Funston. Dog off-leash areas are critical to both dogs and their owners' health and well-being. A fenced in area at a park is not a replacement for running along a beautiful beach and playing in the waves and sand - for both our dogs and their humans. The wildlife are among my patients as well and I have a deep concern for them and the environment. I don't believe dogs do a significant degree of damage to wildlife and I do think having this huge group of people (dog owners) caring about the beaches is critical. We need the people to have an interest so they will take of the land. Thank you for your consideration,

Amy Allen, DVM, Dip ACVIM

Correspondence ID: 520 **Project:** 11759 **Document:** 38106
Received: Feb,04,2011 19:46:22
Correspondence Type: Web Form
Correspondence: My family walks through these areas with our dog every weekend and my parents hike every single day. We are careful to keep our puppy on the path, provide bags for any feces, and respect other hikers along, of course, with the wildlife. Hiking with our dog provides us with the opportunity to appreciate the beautiful place we live and the reason why we continue to support the National Park Service as much as possible. If we could not bring our dogs on these hikes, we would hardly have the opportunity to visit them. Please take this into consideration!

Correspondence ID: 521 **Project:** 11759 **Document:** 38106
Received: Feb,05,2011 11:48:40
Correspondence Type: Web Form
Correspondence: I believe that dogs should be restricted in all national parks and recreation areas, including Golden Gate. I have a friend who took a picture of an off leash dog chasing a snowy plover. If you allow dogs access in all areas, you would be ignoring the needs of others, such as birdwatchers, hikers and

parties who just want to commune with nature. Dogs might be ok in certain less sensitive areas if they are ON LEASH.

I am frustrated with the dog lobby here in San Francisco. Their dogs seem to have more rights to parks than children. They are irresponsible, their dogs leave feces, destroy habitat, and annoy visitors without dogs. Then they resort to mob behavior when it is suggested that their dogs need to be under control.

One other concern: if dog people are allowed free rein in GGNRA, then they will begin to demand it in all the other national parks. It also opens the way for other special interests to demand their so called "rights" to these national treasures, such as off road vehicles, jet skiers, etc.

Thank you for setting out more reasonable rules that protect wildlife and protect the visitor experience in national parks and recreation areas.

Correspondence ID: 522 **Project:** 11759 **Document:** 38106
Received: Feb,05,2011 13:15:22
Correspondence Type: Web Form
Correspondence: I love going to the dog parks with my dog, please do not allow this to happen! Virginia.

Correspondence ID: 523 **Project:** 11759 **Document:** 38106
Received: Feb,05,2011 13:37:49
Correspondence Type: Web Form
Correspondence: I would like to voice support for Alternative A in your dog management plan. I feel that as a hard working tax payer,I have a right to enjoy the areas in the GGNRA with my dogs. I realize that every dog owner has the responsibility to train and control their dogs so that they can be part of the social life of a park. It is the people who don't take this responsibility that should have their dogs on a leash. Please don't punish the many who are in the right for those few who are in the wrong. I have lived here my entire life, almost 60 years. I have walked dogs since I was a kid with my Dad who lived here all of his 84 years. I can't think of a healthier lifestyle than "getting the dogs out". What is good for our dogs, "man's best friend", is good for us. I refuse to believe that the few are going to be allowed to manipulate the GGNRA into a decision that would be so unfair to so many. I think that the portion of your plan that is so important is the educating of the dog walkers as to how vital it is to be a responsible, respectful dog owner. Thank you for considering everyone's point of view. Peggy Klock

Correspondence 524 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,05,2011 13:53:07

Correspondence Web Form

Type:

Correspondence: To Whom It May Concern, I am writing regarding the GGNRA DMP-EIS to voice my strong concern over the language as it affects especially 'New Lands', specifically Rancho Corral de Tierra. I'm also concerned over the potential restrictions on other areas in the GGNRA throughout the Bay Area. I have been a resident and dog owner since 1987 first in Marin then in San Mateo County. I have always enjoyed finding areas where my dogs can run free under voice and sight control. This allows them to socialize freely, exercise and achieve a healthy balance essential to their well-being. I am a responsible owner ? my dogs get leashed if anyone has a concern or appears fearful, and I always carry bags to clean up after them. For the last 20 years I've lived immediately adjacent to Rancho, on an access road that is used by many dog owners every day heading to the lands. Montara has always been dog heaven, and it is not right to change a decades-old practice merely because it is easier for GGNRA. The local dog group has improved the area, providing poop bag receptacles and bins which has made the area much healthier. Horse-riders, other walkers and even mountain bikers all co-exist here without any major issues, except of course when the bikers ride too fast and without heed to people or pets, and somehow it's always our fault! My understanding is that currently dogs are permitted on less than 1% of GGNRA lands ? at least leave us that much please! Alternative E should be the preferred alternative for new lands that have been used for dog-walking in the past ? a total ban on dogs is unacceptable. There are very few places left in San Mateo County to take them ? 'dog parks' are sterile manmade environments with little space and little to interest an eager dog. So few beaches in the Bay Area are open to them anymore ? it's so frustrating for responsible owners like me to be denied access to so many areas with our pets. I'm not able to take them twice a day to Fort Funston, which I understand may well also be severely restricted under the proposed plan. Muir Beach is another area I go to occasionally, I would hate to see that restricted. If necessary have specific times when off-leash is permitted, so locals without dogs or who are fearful may know when they can walk without concern. But don't cut off my one method of exercise and pleasure with my dog completely, I don't want to be a federal criminal!! At least recognize that your blanket statements regarding all new lands to be off-limits to dogs is draconian and completely ignores the efforts of responsible concerned dog-owners such as the Montara Dog Group which have improved the area and provided a wonderful experience to those of us with canine companions. Sincerely,

Grant Weiss, MD Montara, CA 94037

ID:

Received: Feb,05,2011 16:00:03

Correspondence Web Form

Type:

Correspondence: I am writing about the upcoming takeover of Rancho Corral de Tierra open space preserve (currently operated by POST, Peninsula Open Space Trust) by GGNRA, Golden Gate National Recreational Area. This land is 4200+ acres of open space from north of Montara to El Granada on the costal portion of the San Francisco Bay Area Peninsula (between Half Moon Bay and Pacifica). I have two concerns that I would like to voice and ask for your help to get my voice heard.

First ? I would like Rancho Corral de Tierra to stay exactly how it is with NO unnecessary management or development.

Second ? I would like to continue to be able to walk my dog on the trails.

Rancho is an open space preserve ? that means there is no development, no signs, no portable bathrooms, etc. From the beginning of time we, the community, have not needed management to 'help' us use its natural undeveloped lands. We do not need GGNRA to make any changes. I live within a few houses of the Coral Reef Avenue proposed trailhead. I understand GGNRA intends to funnel traffic to this trailhead, establish a parking area, as well as install signs and portable restrooms. As a neighbor I have major objections. Coral Reef Avenue is the one access road to the Clipper Ridge development and they do not deserve excess traffic and parking along their residential street. Nearby streets also do not deserve this traffic. As a property owner on a private road, we will individually incur the cost to repair and upkeep our street when it is damaged by extra usage for those coming to the trailhead. Currently the majority of people who use Rancho are neighbors who are on a walk from their homes and have an invested interest in our community. We do not need an excess of outside people flooding the area and walking at such close proximity to our homes that our privacy and security is legitimately challenged. It is obvious the reasons why nearby neighbors do not want permanent portable restrooms within the vicinity of our homes. We are all getting by superbly without any of these additions and we are able enjoy Rancho without them. There is no need for change.

Without spending taxpayer dollars and years developing a Dog Management Plan, the community has already established our own protocol on how we utilize Rancho lands with respect to dogs. The person who chooses to live on the coastside is typically more inclined to utilize the undeveloped beaches and hills in our everyday life. It seems that that same type of person likes to enjoy the outdoors with their dogs. This community has an incredible dog presence. We already have established our Dog Management

Plan and it says that dogs are welcomed and they are just as important as the human citizens of the coastside. This continues to work and there is no need to modify our welcoming of dogs to the coastside's beautiful beaches and hills. To ban dogs on Rancho will only be an exercise in government futility. It is simply not the way our community works, and how our community works should be an incredible factor in how GGNRA 'manages' our land.

GGNRA should simply leave Rancho exactly how it is today. Since I know GGNRA will never let this be the case, I suggest that we establish a buffer zone. I would like to see that within 1 mile of residentially developed property lines there will be absolutely no change whatsoever. This means no signage, no modifications, and no restrictions of dogs. This zone is probably the most used portion of land for the community. Since the community is doing just fine with this land exactly how it is ? let's keep it this way. The compromise is to let the community have our incredibly small portion of land to use how we have already established works for us, and let GGNRA do what they need for the portion of land that is less used. I realize the political game is in full force so with that I request, at least, that Alternative E is adopted for Rancho so that 'new lands with existing off leash use before acquisition may also be considered for voice and sight control in the future.'

Finally, I am astonished at how GGNRA is not involving or listening to the community. I am a property owner with a SHARED property line with Rancho Corral de Tierra and I also live a few houses from the proposed Coral Reef Avenue trailhead. I have never been contacted for my input or for notification of GGNRA's plans for Rancho. I have attended public meetings put on by GGNRA and they are a complete farce. It was so evident that GGNRA has their own agenda and the input of the community is of no concern or will our voice affect the predetermined path GGNRA has decided to forge. I write this letter in desperation that you will help our community's voice be heard. Please help us keep Rancho Corral de Tierra exactly how it is today without any changes that are not needed by, or asked from, our community.

Correspondence ID: 526 **Project:** 11759 **Document:** 38106
Received: Feb,05,2011 16:00:41
Correspondence Type: Web Form
Correspondence: Please do not change or limit the off leash dog area in SF - GGNRA. There are so many place where people who don't have dog can go to play and enjoy the parks, hiking trails and beaches that are OFF limits to families with dog, and this proposal to take away the recreation opportunities for those of us with dogs is just not right, and penalizes the happy dogs and

their owners who have come to know these places as places they can run and play without problems. By limiting the off leash areas, the GGNRA is just going to create problems as more people will be forced to take their dogs to run and play in congested areas that people who prefer not to be around dogs now frequent. There are so many dog owners in the Bay Area that have been enjoying taking walks with their dogs at Fort Funston and other off leash areas in the GGNRA, and there has hardly been any issues with allowing the citizens and their canine companions to spend time outdoors in these areas, limiting the off leash areas at a time where more and more people are owning dogs and living in the Bay Area is just contrary to the RECREATION area's goals, and puts undue hardship on the majority of the people who currently use these spaces to spend their leisure time and enjoy the outdoors with their family, friends, and yes, their dogs.

Correspondence ID: 527 **Project:** 11759 **Document:** 38106
Received: Feb,05,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Put the dogs on a leash and their ugly owners, especially Nancy Walker.

Correspondence ID: 528 **Project:** 11759 **Document:** 38106
Received: Feb,05,2011 16:30:50
Correspondence Type: Web Form
Correspondence: I find "Alternative D" as the only acceptable one of the proposals.

This is based on a decade of experience both working and recreating in the GGNRA and seeing the first hand effects that off-leash dog use, commercial dog walking and simply allowing dogs into sensitive natural areas has on the resources protect therein. I consider the adoption of ANY one of the other alternatives as an abysmal failure on the part of the GGNRA .

Correspondence ID: 529 **Project:** 11759 **Document:** 38106
Received: Feb,05,2011 00:00:00
Correspondence Type: Web Form
Correspondence: As a dog owner who enjoys Muir Beach with my golden retriever, Duke, and many of his friends, I think it would be a tragedy if we were not allowed there anymore. Many of us love our dogs the way that we love all nature, and work hard to ensure that our dogs, like ourselves, leave no impact on the beach and the surrounding area. Beaches should be fun for the whole family, and that includes those furry members as well.

Correspondence ID: 530 **Project:** 11759 **Document:** 38106

Received: Feb,06,2011 00:12:45

Correspondence Type: Web Form

Correspondence: Hello,

I am a current San Francisco resident who grew up in this city and have lived here for the majority of my life. I believe one of the many things that makes our city great is the beautiful parks and scenic locations that the residents and visitors can freely enjoy.

San Francisco is also an extremely pet/dog friendly city which creates a great environment for dogs and their owners to enjoy those locations even more. Of course, I am one of those dog owners, and Fort Funston is hands down the best place to walk my dog. I know many, many people (dog owners or not) who agree with that.

I was shocked and in disbelief when I heard of the news that there were plans of possibly requiring dogs to be leashed at Fort Funston and many other great locations that are currently off-leash. I think it would be tantamount to a sin if suddenly all the people who currently enjoy walking their dogs off-leash at Fort Funston have that privilege suddenly taken away. I also know many people who make their living walking dogs at Fort Funston. Requiring them to keep their dogs on-leash could potentially put them out of work or at the very least, dramatically reduce their income due the fewer number of dogs they could walk.

PLEASE LET THE DOG OWNERS OF THE SF BAY AREA WALK THEIR PETS OFF-LEASH

Thank You, Rob Snavely

Correspondence ID: 531 **Project:** 11759 **Document:** 38106

Received: Feb,06,2011 00:00:00

Correspondence Type: Web Form

Correspondence: What is this ordinance leaning toward? Nazi Germany? What about banning kids from parks since they litter and trash some of the parks around the city with broken glass bottles and plastic snack pouches? Is that in the GGNRA's future plans?

Correspondence ID: 532 **Project:** 11759 **Document:** 38106

Received: Feb,06,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: Please keep the Bay Area dog friendly.

S.F.'s off leash restrictions have already turned ordinary citizens into criminals. Decreasing off-leash areas, or dog parks in general, will not change dog owners behavior - many of us have well trained, well behaved dogs which physically require strenuous exercise multiple times per day which they simply cannot get on-leash. Denying them that exercise amounts to cruelty.

If you implement a policy that turns tens of thousands of San Franciscan tax payers and law-abiding citizens into defacto criminals, what have you actually accomplished and what does it say about your plan?

Already it is the norm to ignore off-leash dog laws throughout the city, to the extent that police literally apologize when they are on rare occasion forced to enforce them.

Creating mass civil disobedience by decreasing tax paying citizen's rights to public land use, and exposing them to what will be a sporadic, uneven and potentially discriminatory application of the law by pushing for a rule which simply is not logical or enforceable, will be largely ignored by law enforcement (other than at what even currently amounts to their personal discretion) and goes against the ethos of the city, hardly qualifies as good governance or a well considered use of our taxes.

Sincerely,

Ulrik McKnight

Correspondence ID: 533 **Project:** 11759 **Document:** 38106

Received: Feb,06,2011 10:33:54

Correspondence Type: Web Form

Correspondence: Since the proposed changes address less than 1% of the GGNRA area, the status quo should be preserved in order to facilitate a decent off-leash to dog area ratio. With any further restrictions more canines would be crammed into smaller spaces.

With over 300,000 registered dogs in San Francisco, there is a huge need for this space! What study has been done when the off-leash dog areas are increased? (more happy owners and canines, less congestion, more wildlife breeding, less infractions, less enforcement costs)

Correspondence ID: 534 **Project:** 11759 **Document:** 38106

Received: Feb,06,2011 16:59:50

Correspondence Type: Web Form

Correspondence: The Draft Dog Management Plan represents a disaster for dog owners in the bay area, effectively banning them from any meaningful interaction with the California coastline. I STRONGLY URGE you to DISMISS the draft policy and instead maintain the current policy or EXPAND the places to which dogs may enter. The banning of dogs in public parks is an act of scapegoating environmental problems on animals instead of considering the real and damaging effect of human civilization. Moreover, the banning of dogs is a capitulation to fear that is not reality based. Yes, many people are frightened of dogs, but this unsubstantiated fear does not necessitate action. Such action would amount to profiling an entire species based upon the misdeeds of a minority membership. Said misdeeds are marginal, and pale in comparison with the number of humans attacked by other humans. To say that all dogs much be leashed (or banned) because a small number have been problems utilizes the same flawed logic that would rationalize detainment of all arabs within our country because a small number of arabs were responsible for the 9-11 attack. The vast majority of dogs are happy creatures that spread joy to all they meet. They enrich our communities and encourage conversation among persons who would otherwise pass one another without a word exchanged. THIS IS INVALUABLE in creating community.

Correspondence ID: 535 **Project:** 11759 **Document:** 38106

Received: Feb,06,2011 19:00:44

Correspondence Type: Web Form

Correspondence: As a dog owner in the Bay Area we love Fort Funston and drive the 45 + min drive there to enjoy time with our furry family member. Sometimes we don't always go down to the beach so it's nice to have the trails on the bluff as off leash so our Stella can roam and enjoy time off leash as well. There are so few areas in the Bay Area that dogs can enjoy off leash with their owners. All the times we have been there we've never seen anyone with out of control dogs. You see lots of families and everyone seems to pick up after their furry family member. It would truly be a shame for you to change anything about the park at this point. Even to just parts being leashed areas seems to ruin why it is a main attraction for so many dog lovers around the Bay Area. If you read reviews on Yelp there are people who go there that don't even have dogs just to get in their dog fix. There are so many other beaches in the area that dogs aren't even allowed on please don't take away or limit this amazing place.

Correspondence ID: 536 **Project:** 11759 **Document:** 38106

Received: Feb,07,2011 00:21:08

Correspondence Type: Web Form

Correspondence: My concern is that so many Big Dogs are not on leash in the GGNRA. I ,almost, was attacked by a grey female pit dog once, while running on Ocean Beach, between Vicente and the Western edge of the Golden Gate Park. I did report it to the police at the station on the 24th ave. between Taraval and Santiago. I would like to see more enforcement of the leash law in the GGNRA. Sometimes weeks could go by without seeing a ranger. I would like the leash law not too be too onerous on Rangers, so that they must issue citations only to dogs that could cause damage. I have no problems with small dogs not being off leash, but big dogs that could cause damage to the body must be under leash. Unfortunately many of us don't understand how to react to big dogs trying to sniff us or just being curious. The onus is on the dog owner to keep them under leash. Thank you Nafiss Griffis

Correspondence ID: 537 **Project:** 11759 **Document:** 38106

Received: Feb,07,2011 10:19:44

Correspondence Type: Web Form

Correspondence: I am the author of two local trail guides, "Tamalpais Trails," and "Open Spaces, Lands of the Marin County Open Space District," and have been leading hikes and running in GGNRA and adjacent parklands for nearly 40 years. Decades ago, reckless and illegal bicycling was the #1 menace to the parkland and its visitors. But over recent years, the proliferation of off-leash dogs, where permitted and not, has become the greatest problem. Literally hundreds of times, dogs have jumped on me while I run or hike. I consider this a serious invasion of privacy. I have also been tripped, or dangerously nearly so, numerous times. I regularly see dogs chase rabbits and other wildlife. Whether they catch the animals or not, surely they wreak havoc on their lives and breeding. Professional dog walkers run their commercial business free of charge on GGNRA and other public lands, passing the cost on to other users. The sheer number of dogs and dog walkers overwhelms many trails and trailheads. And when rules and laws are so flagrantly broken, as dog owners--more than anyone else--so brazenly do, no one can really feel safe in the open space. I applaud the GGNRA draft plan's efforts to restore reason and science to this out-of-control off-leash dog problem. Other jurisdictions--my town of San Anselmo just one example--have wilted in the face of aggressive opposition by dog owners. Please, do what is right for the land, for its natural denizens, and for the peaceful, passive, law-abiding citizen users. Do not retreat from this plan, which already represents an enormous compromise from the restrictions other national parks impose.

Thank you.

Correspondence ID: 538 **Project:** 11759 **Document:** 38106

Received: Feb,07,2011 10:24:32

Correspondence Type: Web Form

Correspondence: As a resident of the Capehart Housing (located in Fort Berry of the Marin Headlands) I strongly support Alternative A or E for the Marin Headlands Trails. Due to increased traffic and construction in the park, roads have become dangerous places to walk with a dog. Since the elimination of the speed bumps in Capehart (between McCoullough and Menges St) motorists routinely travel over 40 mph through our neighborhood. For this reason I and the other dog owners in Capehart would like to preserve on-leash dog access to especially the Julian Fire Road so that we have more options for walking our dogs in the park. Residents in neighboring areas, such as Sausalito and Mill Valley, are able to safely walk dogs on residential streets, but since our roads provide the only access to Rodeo Beach, they become extremely crowded and dangerous on the weekends. We have few safe options for walking dogs in our neighborhood and access to the trails in the upper Rodeo Valley would provide safe opportunity for us and our pets.

Correspondence ID: 539 **Project:** 11759 **Document:** 38106

Received: Feb,07,2011 11:26:38

Correspondence Type: Web Form

Correspondence: Dear Sir/Madam: I used to live in Daly City (10+ years) from the mid-80's to late 90's. I took my then dog to Fort Funston (FF) on a frequent basis. I was a young man and the regular exercise kept both my dog and I fit. My beloved dog lived to 19 years old and I am currently in VERY good shape for a 40-year old. I moved from Daly City some time ago, but still return to Fort Funston with my two Weimaraners at least once a week. We go to FF for the nature, fresh air, safe surroundings, and to socialize with other outdoor enthusiasts (sportsmen, dog owners, dogs, joggers/walkers). I have noticed how wonderful the mood is there and how responsible the folks are that take their dogs to FF. Of course you have a few issues/spats between dogs (mostly due to their owners), but it is far fewer than the altercations outside of FF that I witness between humans on a daily basis in road rage or assaults, thefts, fights, etc. I heard somewhere recently that there is 1 dog for every 4 residents in San Francisco. That is a lot of people with a lot of dogs. These owners hire professional dog walkers to run their beloved pets so that they stay healthy and reduce waste pollution in the city. I am not a dog walker, but I believe these new restrictions on places such as Fort Funston will do more harm than good. Let's keep pets healthy, owners happy, pollution down and save some money by keeping things at the parks the way

they are. Thank you.

Correspondence ID: 540 **Project:** 11759 **Document:** 38106

Received: Feb,07,2011 12:53:00

Correspondence Type: Web Form

Correspondence: Hello and thank you for the opportunity to voice my opinion about dogs at GGNRA. My wife and I (and our two dogs) moved here to the Bay Area last June. We are very grateful to live in such an incredible place, and are especially impressed by the conservation efforts in such an urban area- both by government and not-for-profit organizations such as Open Space Trusts. Both of us are former National Park Service employees (SEKI, GUMO, and BUFF for I, and GRCA, BAND, and NOCA for her), so we understand concerns about resources, visitor protection, and public perception. Presently, I am a PhD student (geology) at Stanford and my wife is a GIS Analyst in the private sector.

That being said, we visited Fort Funston with our dogs yesterday (Sunday, Feb 6) for the first time. It was truly the greatest place we have taken our dogs since moving to California (the playas around Death Valley are a close second, however.) I am not sure what the specific language of the EIS states, but I would like to offer my advice:

The ability to bring dogs and allow them to walk/run leashless on the stretch of beach from the Fort Funston parking area south is fantastic. In my opinion it is a cultural highlight of the Bay Area, in that dogs and their owners are given both freedom and responsibility beyond the norm- and a very special environment is thus created. I strongly oppose any changes to the current language that allows the present environment at Fort Funston with respect to allowing dogs off leashes and having significant stretches of coastline for this sort of recreation.

That being said, I understand concerns about commercial use of the land (by dog walkers, etc) and think there needs to be a commercial permit process that could help fund maintenance/infrastructure. Additionally, I would not be opposed to a small fee for use (as long as an annual pass was available) to help with infrastructure needs.

Thank you for your time.

Respectfully,

Eric S Gottlieb

Correspondence ID: 541 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,07,2011 14:17:42

Correspondence Type: Web Form

Type:

Correspondence: Sunday was amazing it was 73 degrees on Stinson Beach at 10 am. My husband, dog and I walked from Stinson to Bolinas Lagoon along the beach. There were so many people and dogs. Everyone had a smile on their face.

I did not see any dogs fighting, invading personal property or chasing wild life. I could not see any any dog poop on the beach. My informal nonscientific survey estimated that about 50% of the people had dogs. None of us would come to the beach for a walk without our dogs. How can you remove so many peoples privilege to enjoy nature.

Correspondence ID: 542 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,07,2011 14:31:49

Correspondence Type: Web Form

Type:

Correspondence: Please keep the dog walking areas of the Bay Area free! You are all missing the point! Too much regulation leads to more problems, more lawsuits and more conflicts, because you will always have someone that over steps the regulations! If your intent is to put in place rules that will be broken so you can issue tickets or fines in order to raise revenue I say shame on you! We use the Fort Funston and Crissy Fields areas daily with our dog and have never encountered any problems. Yes, all dog owners need to be responsible for their pets, and the majority of them are. Just as all drivers need to obey rules, but some drivers don't! Please leave the law as it is now, the "no action" alternative is just fine. The purpose of walking or running with your dog is to experience a brief moment of freedom - to interact with others that are enjoying their moment of freedom too. Leave well enough alone!

Correspondence ID: 543 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,07,2011 15:30:21

Correspondence Type: Web Form

Type:

Correspondence: Re: Rancho Corral de Tierra - Draft Dog Management Plan

I am a 15 year resident and homeowner of Montara who has walked my dogs in the open space for nearly all of those years. My dogs are walked on the trails; 50% on leash, 50% off leash, but always controllable by voice commands. My dogs have never caused an issue nor have I experienced an issue with other dogs. And, I always pick up after them ? on or off trail.

Montara is unincorporated so there are limited street lights and no sidewalks

or designated crossings on Highway 1. Closing the open space to dog walking is not only unpopular, it is unsafe. There have been three dogs struck and killed by cars in the past several years, one walking near the road in front of his owner's house, the other being walked by his owner on leash (both on 4th Street). Only 3 weeks ago, a man and his dog were struck trying to cross Highway 1 in Montara ? the dog was killed.

Closing this space to dog walking eliminates any safe opportunity for dog walking in the community. Closing this space to dog walking will force me and many neighbors to walk their pets up and down residential streets (no sidewalks), many times in the dark (few streetlights). This would create unsafe conditions for the dog walkers, the dogs, and the car drivers (as most of us are).

I strongly suggest the GGNRA come up with a shared solution, i.e., dog walking hours, dogs on leash hours, dogs off leash hours, people only; some creative way to share the beauty of the space and the opportunity for healthy exercise for those with dogs, without dogs, and new visitors.

Many of us moved here specifically for the open space, the beauty and the opportunity to enjoy it unencumbered by regulation. Please work with the community to develop an alternative to eliminating dogs completely in the open space.

Thank you for your consideration and attention to this matter.

Robin Hesterberg

Correspondence ID: 544 **Project:** 11759 **Document:** 38106
Received: Feb,07,2011 15:32:00
Correspondence Type: Web Form
Correspondence: Dear GGNRA,

I urge you to maintain the current status of off leash areas in the GGNRA. If any other group was utilizing this area for peaceful recreation like we dog guardians are you wouldn't be considering lessening our access--you would increase it or find ways to accomodate the tax payers who are using the land. People walking with their dogs--enjoying the beauty of our city are and will continue to be an ally for responsible land stewardship. We would rather work with you.

Correspondence ID: 545 **Project:** 11759 **Document:** 38106
Received: Feb,07,2011 17:06:07
Correspondence Type: Web Form

Correspondence: No change.

Correspondence ID: 546 **Project:** 11759 **Document:** 38106

Received: Feb,07,2011 18:19:21

Correspondence Type: Web Form

Correspondence: I grew up in San Francisco two blocks from the Presidio on Broderick street and further have volunteered in the Marin Headlands for the last 4 years. My comment is that off-leash dog walking needs to be severely restricted in the GGNRA. The majority of dog owners I have come across pay little regard for the rules and allow their dogs to run wild and trample native plants, invade the space of other users in the park and chase wild birds. I think that voice-control does not exist in reality as an excited dog off leash will always prefer to chase a bird over returning to its owner. I further have concerns about the amount of dog excrement I have found all over the park and on the beach where children play. I love dogs and have had several german shepherds. At the same time I understand that we need to preserve our important natural resources. Therefore, this plan should go as far as possible to restrict nearly all areas of the GGNRA to either prohibit dogs or to make dog owners walk their dogs on leashes.

I think that the GGNRA needs to increase enforcement of currently existing regulations as well as these proposed regulations. The GGNRA and City of San Francisco could earn a lot of money to pay to preserve the park from the income that would come from leash violation fines.

Correspondence ID: 547 **Project:** 11759 **Document:** 38106

Received: Feb,07,2011 19:37:15

Correspondence Type: Web Form

Correspondence: I appreciate the opportunity to comment. Thank you.

In part I see this document the result of the lack of regional management. That is, as more and more agencies listen to their lawyers and restrict dog use, less and less land is available for the walking of dogs. So, now GGNRA must protect itself as more and more people have been finding the only 'freedom' to be ahd is on certain GGNRA lands, that they in fact own (in a manner of speaking).

I will speak just of the Alta Ave-Oakwood valley area. What you have for Oakwood Valley is consistent with current regulations, other than now allowing leashed dogs on the stretch between fire road and Alta. I think this is a good decision. However, your plan doesn't seem to discuss Oakwood Valley Trail, though I admit I've not read the whole thing. I would hope that

dogs are allowed on OVT, as they seem to be now.

I am a wildlife ecologist (mostly specializing in birds), have worked for conservation non-profits as well as ecological consulting firms, have lived in Marin County for 40 years and at end of Alta Ave (Donahue) for 15 years. I have contributed 100+ hours per year to habitat restoration on Alta (weed removal) for the past 5 years. I have walked my dog, or had my dog accompany my weed removal, about twice per day on Alta Ave, more or less, on days when I'm present (mostly). I note that the DEIS states lots of 'could's and 'maybe's in terms of impacts from dogs. I don't see alot of data in the DEIS. Well, I do know about dogs vs snowy plovers but we're not talking snowy plovers at Alta.

Along Alta, in the past 15 years, I have seen mountain lions 3 times, coyotes every few weeks, and I know of where bobcats have dens in two places. I have seen the increase in ground nesting birds with the arrival of coyotes several years ago and the resulting disappearance of feral cats. Dogs haven't affected any of this. Positive actions, like exotic weed removal, has made a huge impact on return of native flowers. Please provide more funding to the Park Restoration program, that is if you're serious about wanting to see an increase in the 'wild' experience of park users. I don't see further restriction on dogs as being positive toward restoring this area.

My surveys indicate that 2/3 of persons using Alta do so with dogs, mostly off leash, if you don't include the joggers and bikers. If you include them, then its 50%. In fact, so high is the association of people with dogs, that my dog expects to see another dog when he sees a person. Alot of commercial dog walkers use Alta, and my survey does not include them. They are, however, very responsible, and I have never had any problems with them. In particular, they clean up the dog poo, including that left by less conscientious persons. The Park no doubt, sensitive to its lawyers, pays attention to the negatives received from people who want it all. I'm sure they have complained about the dogs in general, and the dog walkers in particular. If those people need a wilderness experience, then they should go to PRNS and its wilderness areas, or areas where dogs are already excluded. That's my definition of 'multiple use'. GGNRA is a wonderful urban park and should allow all kinds of recreation, including humans' interactions, positive ones, with their dogs.

Thanks for listening.

Correspondence ID: 548 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 08:34:41

Correspondence Type: Web Form

Type:

Correspondence: I am opposed to the changes in leash laws pertaining to NPS lands in

San Francisco.

Correspondence ID: 549 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 09:22:47

Correspondence Type: Web Form

Correspondence: I own two large dogs who need at least one hour of exercise a day. I take them to Fort Funston every single day - sometimes twice a day. I am a responsible dog owner - I pick up after my dogs, ensure that they are not destructive (digging, chewing, etc.), not aggressive (to other dogs or humans), and that they don't enter restricted areas. In my experience, all of the visitors to Fort Funston (with minimal exception) exhibit the same level of responsibility as I do. There is rarely an incident between dogs - and when there is, the owners act responsibly. I rarely encounter piles of dog waste on or off the trails, and when I do - I pick it up.

There are very few areas in San Francisco where dogs can run off leash, and taking these few areas away will have a wide reaching negative impact. The already overcrowded, small, and poorly maintained "dog parks" will only worsen. Dogs will suffer - they will not get the level of exercise that they need to maintain a healthy lifestyle. Visitors to Fort Funston will decrease dramatically - I would estimate that over 95% of the daily visitors are dog owners.

Everyone should be able to access and enjoy Fort Funston and the other areas in question - whether or not they are a dog owner. For those who don't want to be surrounded by dogs - use one of the MANY parks where off leash dogs are not allowed - there are far more of these areas than the limited off leash areas.

Correspondence ID: 550 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 09:41:05

Correspondence Type: Web Form

Correspondence: This would be a very sad change to San Francisco, San Mateo, and Marin Counties. Having these designated areas for dogs to be off leash has been a very safe and fair way to allow dogs and their owners to get the exercise and socialization they need to thrive. By limiting these areas as it is being suggested, it will severely limit the amount of space needed for many large and energetic dogs to burn off energy and get the exercise they need. It would be a travesty to the mentioned counties to slash the areas dogs are allowed off leashes. Please re-consider making these changes, as taking away these open areas will be devastating to both the dogs and the dog owners.

Correspondence ID: 551 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 12:04:36

Correspondence Type: Web Form

Correspondence: I don't support this proposal at all. While I think it is fine to make certain designated areas a dog free zone, moving to uniform dog free is too much. For example, the eastern part the beach on Chrissy field could be made dog free, while the western part would be a place where dogs are allowed to play.

Correspondence ID: 552 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 12:19:04

Correspondence Type: Web Form

Correspondence: I was shocked to learn that further reductions were being proposed in the open space where dogs are allowed. As it stands there are only a few trails and open space areas available for dogs which provide multiple social and physiological benefits to members of this community.

We had 1 year between dogs and it was amazing to me to learn how much more exercise and walking I did while having a dog vrs when I did not. Every day I walk my dog on the oakwood trail after dropping my kids off from school, or on the homestead trail in my neighbor hood. The ONLY people I encounter are other dog walking individuals whose dogs are able to visit with eachother, get great exercise, experience the open outdoors AND allow their owners the same benefits. I have lost 7 pounds in the past 6 months simply by virtue of taking my dog for a daily walk or hike and I have met some new friends along the way. On weekends, we take the kids and the dogs on certain dog approved trails and we all enjoy our family outings. It would not be the same without our pooch and he deserves to be able to join us on these outings. He cant come to the mall, cant come to many sporting events and cant come to school. There has to remain some places where families can enjoy their pets together and use the outdoors in good health. Being in Tam Valley there are few, if any sidewalks so street walking is not a great option. Additionally, my lab would not be well exercised if only kept on a leash. If I were to simply go to the disgusting dog park, not only would I not get any exercise myself, but I would not be able to take advantage of the gorgeous paths and wooded areas that I feel in love and caused me to move here. Also, the polluted water at the dog park would surely sicken my dog.

People who are not keen on dogs have hundreds of park trails to walk on as it stands. let the bird watchers and non dog lovers use those trails but give us

some space that we can enjoy with out loved ones as well. Fine those who are not responsible but dont let a few bad eggs spoil it for the rest of us who rely on these areas for our health and pure enjoyment.

Correspondence ID: 553 **Project:** 11759 **Document:** 38106
Received: Feb,08,2011 12:20:04
Correspondence Type: Web Form
Correspondence: We are running out of p[laces to allow dogs to hike and relax with their owners. It's unfair to the responsible dog owners to continue banning dogs from all the parks.

Correspondence ID: 554 **Project:** 11759 **Document:** 38106
Received: Feb,08,2011 12:43:21
Correspondence Type: Web Form
Correspondence: I am outraged with the new anti-dog plan. Where do you expect people to go with their dogs? Dogs are called man's best friend for a reason. The idea that the GGNRA says it wants to clarify the rules is a bunch of horse manure. Your agency has given dog owners, who by the way are tax payers, less than 1 percent of the land to use. Now you are trying to take even more away? SHAME ON YOU! It won't work. You will see. People will rise up and show that we're not going to take it!

Correspondence ID: 555 **Project:** 11759 **Document:** 38106
Received: Feb,08,2011 13:24:07
Correspondence Type: Web Form
Correspondence: I never knew Marin to be unfriendly to dogs. As a matter of fact, we moved to Marin in 2004 because it is known to be friendly to dogs and kids...now I find NEITHER to be true. If you pass this measure, I will guarantee that people will move out of this area, which will cause the housing market to drop. Why have wooded areas if you can't take your dog with you on a hike? Unfortunately for us, there are a few dog and children haters that live in the area and try to use their power for their own "personal" agenda. Please take into account the numerous people that live here and have pets. Even if I didn't have a dog that likes to go on the trails, I would still feel very firmly that dogs should be allowed on the trails. Please keep the trails open to people, dogs and kids... we all live here together peacefully.

Thank you

Correspondence ID: 556 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,08,2011 14:34:00

Correspondence Web Form

Type:

Correspondence: It was so hard for me to hear recently that there was a drafted plan restricting where we can take dogs off-leash or even restricting where we can take dogs at all.

I am a responsible dog owner and mother that loves taking our eager 2 year old lab to all the corners of San Francisco where he can play, run freely, swim, chase, explore and soak in the sun (and of course fog!). He's a trained lab who comes when he's called. We pick up after him regardless of where he goes. We don't let him walk in the areas that have been marked for preservation. We love going to Crissy Field, Ft Funston, Lake Merced....

Our dog also has a dog walker that walks him three times a week and takes him to Ft Funston to do what he loves and takes him off-leash. When he first started getting walked by them, they kept him on leash to train and ensure his recall was up to snuff before they let him walk with all the others. We're at work all day, and for him to have this outlet and use his energy outside, is so wonderful. I love sitting at my desk during the day and knowing he's going to be picked up and have the time of his life with all of his dog friends and really get to use all of the energy he has bottled up. If you take this away, his walks will just be a bathroom break. Rather than a 2 hour romp, it might just be an around the block bit of air before he goes back in.

Our dog is part of the family, and for him to have this experience outside in such a beautiful city is invaluable to us. I strongly believe dogs and wildlife can co-exist, that dog owners can be responsible to pick up after their dogs, control their dogs, and that people, dogs and environment can all be a part of the same outdoor space and respect it at the same time.

San Francisco is such a dog-lover city - I hate to see it go down this path and be so dog-unfriendly....

Correspondence 557 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,08,2011 15:13:55

Correspondence Web Form

Type:

Correspondence: Regarding your Dog Management plan, I have several comments:

1. First, in an era of budget shortfalls and cutbacks, the amount of time, effort and resources which you have misallocated to an issue as miniscule as this, both astounds and enrages me, from my own perspective as a tax payer.

2. That said, and under the circumstances of continued fiscal shortfalls for your budget, you and your organization would be best off in allowing the status quo to prevail...

3. Obviously given your mandate to meddle and your complete unaccountability to the residents of the city of San Francisco, that's not going to be the case.

4. So, I must request, that you NOT CHANGE any of the dog policies regarding Ocean Beach or what you call the Snowy Plover Protection area. This is an urban area of your park. As such dog owners have the right and the obligation to exercise their dogs in such an area. Your efforts to further restrict dog management policies to disallow dogs, or disallow off leash areas would challenge that basic right and be harmful to both individuals and our animals. Please dont do it.

There are plenty of places where the plovers can go to do whatever it is they do, or where individuals who have problems with on leash dogs can go. It is not a problem. LEAVE US ALONE!!!

Correspondence ID: 558 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 16:10:51

Correspondence Type: Web Form

Correspondence: I own one dog and truly enjoy spending time with her in the outdoors, including Muir Beach. I understand and respect how fragile the eco-system is at Muir Beach and act accordingly. I would never let my dog harm any other living being and clean up after here whenever we are out. I would be very disappointed if that beach was no longer accessible to my dog. I would be willing to volunteer my time if this would in some way insure access for my dog at Muir Beach.

Correspondence ID: 559 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 17:44:45

Correspondence Type: Web Form

Correspondence: Dogs and beaches go together. Don't ban dogs on the beach!

Correspondence ID: 560 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 18:46:26

Correspondence Type: Web Form

Correspondence: Fort Funston has been a treasure for taking our dog where she can run with other dogs in a natural environment. The vast majority of people who walk the trails and on the beach are dog owners. I have never seen owners

allowing their dogs to go into restricted areas where there is vegetation growing. While I am sure there are some violators, even with new rules there will be violations. I understand that there must be rules in this park, but is there a problem currently that requires that you be more restrictive than at present.

Correspondence ID: 561 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 19:14:50

Correspondence Type: Web Form

Correspondence: Dear Superintendent,

RE: Appendix F

Thank you for the opportunity to make a comment.

I am a native to the bay area and live in San Francisco.

I'm making a comment today bc I happen to be off work, working on an independent project, and I went to Crissy Field, East Beach where I brought my lunch. Much to my surprise, while I was there, over an hour, 3 different Prof Dog Walkers (DW) came by with more than 6 dogs each. I have pictures. I counted 8 and 9 with two DW. One of them left 5 dogs in the car, while walking the 8 dogs.

I called the NPS line and inquired bc it seemed excessive. The dispatch line was helpful and directed me here.

I am surprised and disappointed by a number of the proposed terms in Appendix F:

- I believe the NPS land is for the US citizens to enjoy not for commercial use - therefore, I think the proposal as it stands is too lenient - I believe 6 dogs per DW is too many. 4 max is much more acceptable. - Again, I don't think the NPS land should be allowed for commercial use for DW. My preference would be none. My taxes are going to supporting their business on public land. - this is different than let's say a 10K run - this benefits a large number of individuals - DW are the only ones to benefit from their business while using public land

Times: I'd like to propose the following for Commercial Dog Walkers:
Midweek: 9 - 12 and 1 - 5. Weekend: 11 - 12 and 1 - 3.

Costs: I hope the cost of the permit includes wear and tear by their use, cost of dog poop bags, costs for enforcement, and for the disposal of the dog

poop they leave behind. Today, as I ate lunch, and NPS service truck came by collecting trash and had to pick up one of those nice blue dog poop bags.

Enforcement / Revocation: Are you serious? this is way too lenient. This isn't major league baseball where every agrees that 3 warnings for steroid use is a joke!

I propose: - 1st warning with fines at a level at which that will provide a deterrent. - 2nd warning 3 month revocation - 3rd warning permanent revocation - revocation can occur at any time depending on the offense.

In addition, Parking: - DWers shouldn't be allowed to park in front space stalls. they should have to park in the back of the parking lot since they are there for commercial use. - convenient and close parking stalls / spots should be saved for personal users of NPS land.

I personally find dog walkers use of public land annoying and a nuisance for the general population. I think they should find other locations to run their business than on community property.

Can I also suggest that you allow for picture attachments to the comment section. I have pictures of the events from today.

Thank you very much for your time. Best Regards Matt Richardson, PT,
DPT UCSB - Bio Sci - 1994 Duke - DPT - 2004

Correspondence ID: 562 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 21:46:52

Correspondence Type: Web Form

Correspondence: Dear GGNRA, Please keep the beaches open for dogs. As a city dweller it is vital to our community to have public areas that are dog friendly. Most of the dog parks have in my area have proven to be dangerous for many dogs and not a healthy environment for stability. If the wildlife is threatened it is important that we preserve essential breeding areas with proper fencing and signs. As far as dog waste goes. We should all be responsible for removal regardless of its location. Littering is illegal. (And that should include horse feces as well.) San Francisco and the Bay Area is revered as the country's most dog friendly destination. Lets try to keep it that way so we don't loose our community. Thank You, Elizabeth Berger

Correspondence ID: 563 **Project:** 11759 **Document:** 38106

Received: Feb,09,2011 13:03:15

Correspondence Type: Web Form

Type:

Correspondence: I am a SF native and over the years have seen the number of dogs increase while the number of children has decreased. I have also seen the number of restrictions placed on dogs and their owners increase. While I do have children and am not a dog owner, it seems unfair to so severely restrict dog owners from public recreation areas. Yes, some dog owners are irresponsible, most are not. The same holds true for parents! When citizens use public multi-use recreation areas they should expect to see other people, families, environments and yes, animals including dogs. A more appropriate plan would call for great fines and enforcement of reasonable restrictions. More visible enforcement of pet waste clean up with large fines would eliminate the #1 problem with irresponsible dog owners. More visible enforcement would also encourage higher compliance with leash laws, increasing safety. The proposed plan with severe restrictions is estimated to cost over \$1million, more visible enforcement of current rules would not cost more than that. Don't deny people recreational experiences with their beloved pets, just make sure they follow the rules.

Correspondence ID: 564 **Project:** 11759 **Document:** 38106

Received: Feb,09,2011 13:33:30

Correspondence Type: Web Form

Correspondence: This would be a very sad change to San Francisco, San Mateo, and Marin Counties. Having these designated areas for dogs to be off leash has been a very safe and fair way to allow dogs and their owners to get the exercise and socialization they need to thrive. By limiting these areas as it is being suggested, it will severely limit the amount of space needed for many large and energetic dogs to burn off energy and get the exercise they need. It would be a travesty to the mentioned counties to slash the areas dogs are allowed off leashes. Please re-consider making these changes, as taking away these open areas will be devastating to both the dogs and the dog owners. This would be a very sad change to San Francisco, San Mateo, and Marin Counties. Having these designated areas for dogs to be off leash has been a very safe and fair way to allow dogs and their owners to get the exercise and socialization they need to thrive. By limiting these areas as it is being suggested, it will severely limit the amount of space needed for many large and energetic dogs to burn off energy and get the exercise they need. It would be a travesty to the mentioned counties to slash the areas dogs are allowed off leashes. Please re-consider making these changes, as taking away these open areas will be devastating to both the dogs and the dog owners.

Correspondence ID: 565 **Project:** 11759 **Document:** 38106

Received: Feb,09,2011 16:34:19

Correspondence Web Form

Type:

Correspondence: Although I may disagree, I understand the argument for less off-leash dog areas. Sites like Crissy Field are often overrun with dogs, making a picnic on the beach quite difficult. However, there are plenty of spots in San Francisco for a quiet picnic. There are less spots for dog owners to enjoy playing with their loved ones in wide open spaces.

Regardless, what frightens me about this discussion is that FENCED IN DOG PARKS ARE NOT THE ANSWER.

1. Dogs are territorial, and marking off territory for one to dominate is a really bad idea and will certainly result in a few bad dogs reigning. 2. All dog owners know that the best way to avoid dog conflicts is to "keep moving." In a fenced in dog park, there is no way to keep walking. 3. Dogs run and frolic less when confined. Dogs like to explore, smell different smells, and generally look around. The fenced in dog areas which now exist around the City do not contain the variety of terrain and smells that come with taking a long walk.

Furthermore, it is unclear that those who seek to limit off leash areas understand the importance of off leash walking. Like children, many dogs have a lot of energy to expend. Dog owners prefer that that energy be let out by allowing the dogs to run (like recess for children during school) instead of by acting out and eating furniture (just as children do with too much energy).

So please, while I recognize that there are some spots which attract a lot of dogs, and that further partitioning may be necessary, I urge you to consider the reasons why fenced in dog parks are no solution at all. Instead, delineating further on leash only areas is the best compromise.

Correspondence ID: 566 **Project:** 11759 **Document:** 38106

Received: Feb,09,2011 17:34:31

Correspondence Type: Web Form

Correspondence: It is absurd to outlaw dogs from the GGNRA for it is not the dogs which are the problem but the owners of the dogs, people. Dog owners who are uneducated about the potential destruction which dogs could cause are at fault. Furthermore, I can guarantee that people, with or without dogs, cause far more harm than any number of pets can do.

Correspondence ID: 567 **Project:** 11759 **Document:** 38106

Received: Feb,09,2011 17:43:31

Correspondence Web Form

Type:

Correspondence: Please keep off leash dog walking in the GGNRA and do not impose further restrictions.

As a long-time resident and member of the San Francisco community, I strongly support maintaining current and providing additional leash-free areas in San Francisco and its surrounding communities. One of the things that makes San Francisco such a wonderful place to live is that it balances between being a major metropolitan area offering the best of city life, but it also provides access to great neighborhoods, nature and the outdoors. Restricting access to these areas by certain members of the community is discriminatory, intolerant and downright unfriendly.

Off leash dog walking supports responsible dog ownership. Dogs need sufficient exercise and socialization multiple times a day every day. With that said, responsible dog ownership obviously includes keeping dogs under voice control at all times and picking up dog waste. The few individuals that do not currently exercise responsible dog ownership will likely continue to offend even in light of increased restrictions. In my personal experience, most dog owners DO act responsibly and are likely to police themselves by confronting individuals that do not follow responsible or acceptable behaviors. I would rather see greater deterrents in place to focus on offenders (such as increased fines for not picking up dog waste) rather than imposing restrictions that punish everyone.

Northern San Francisco (Marina, Cow Hollow, Russian Hill) is noticeably an area heavily populated by dogs and but lacking off leash dog parks. One of the few places that has been traditionally used for off leash recreation for many years is Crissy Field. Crissy Field should certainly retain the status quo and continue to fulfill this needed purpose. Fort Mason should also legalize off leash dog walking. So called "environmentalists" have argued the environmental impact that this would have on this park; however, I find these arguments weak as this is clearly a manicured urban park. Fort Mason lends itself well both geographically and functionally as an off leash dog walking option in an area that currently does not provide its surrounding neighborhoods with a dog friendly park. Overall, the community has clearly demonstrated that it needs off leash dog parks and areas of recreation. I have enjoyed spending quality off leash time with my dog at Crissy Field for many years, and have appreciated this right so much that I have been moved to "give back" by volunteering my free time to do landscaping work at Crissy Field. I am sensitive to my environment but do realize that dogs and their people are part of that environment. We need to keep the GGNRA accessible to all, not just special interest groups, and this includes not discriminating against dogs and their owners.

Correspondence ID: 568 **Project:** 11759 **Document:** 38106

Received: Feb,09,2011 19:49:01

Correspondence Type: Web Form

Correspondence: I have been walking my dogs at Fort Funston for over 15 years. I think the current dog situation is wonderful and do not want there to be any changes.

There are many places to access the ocean without dogs, there needs to be places to access with dogs.

Should the GGNRA committee try and restrict dog access I will do whatever I can through protesting and pushing my supervisors to take back control of the areas given to the GGNRA.

Sincerely

Lance Martin

Correspondence ID: 569 **Project:** 11759 **Document:** 38106

Received: Feb,09,2011 20:01:02

Correspondence Type: Web Form

Correspondence: Off leash dog use is not compatible with general public use of a park. Off-leash dog use is only safe in a fenced-in area where it does not interfere with public use of a park. Dogs are annoying and dangerous and damaging to an environmentally sensitive area.

My family has endured 15 years of off-leash dog walking in our local West Cliff Drive and Lighthouse Field State Beach area. We have experienced many dog owners who feel that their dogs off-leash freedom is more important than public safety of my children, or anyone other public users of the public area.

Because our area is popular for dog walking, and the lax enforcement by (understaffed) city or State rangers, many dog owners just assume its ok and not bothering anyone to let their dogs run free.

But many people are bothered by dogs, and sometimes dog bites and injuries due to dogs being off leash do occur. After 10 years of our city allowing dogs off-leash here in limited hours, the city proposedg that, "because our experiment worked so well" to make it an all-day off-leash area.

I then attended city government meetings to protest this, having had many

bad experiences with dogs and their owners here. A local group of citizens formed, Lighthouse Field Beach Rescue to protest this. For 15 years we have struggled to inform local and state government agencies that off-leash is a dangerous policy in such a public area. OFten we were not heard due to the high number of dog off-leash proponents, organized through "Friends of Lighthouse Field" But we have held our ground in this issue and finally filed, and won, a lawsuit versus the City of Santa Cruz to prevent their turning LHFSB into an all-day off-leash area.

Please do not allow off-leash dog use except in a posted, fenced in area, or you will attract many users who are allowing dangerous and offensive behaviour that drives other humans and wildlife users out of the park.

Thank you for your consideration

Correspondence ID: 570 **Project:** 11759 **Document:** 38106
Received: Feb,09,2011 23:26:12
Correspondence Type: Web Form
Correspondence: Please institute the strictest controls on dogs. Dogs are deleterious to wildlife and plant life.

Correspondence ID: 571 **Project:** 11759 **Document:** 38106
Received: Feb,10,2011 03:22:20
Correspondence Type: Web Form
Correspondence: "only 1% of GGNRA is open to people with dogs as it is"

Greetings, please leave the dog areas the way they are now. & have the horse owner/riders please pick up their animal waste, as the dog owners do now, ew.

I was part of the original bunch of dog owners that dealt w/ you folks when the Presidio/Crissy Field 1st became public, & figured out how to make all parties happy & using the beach to it's fullest extent.

We dog folks are out there EVERYDay, rain, fog, wind, or Sun. & the parents w/kids are mostly only out on warm sunny days. Who has a better feel for whats happening out there?

again, please, lets leave well enough alone, & the snowy plovers are going to get on the best they can, w/ or w/o our help. Thanks, Lenny

Correspondence ID: 572 **Project:** 11759 **Document:** 38106
Received: Feb,10,2011 10:00:06

Correspondence Type: Web Form
Correspondence: No Change.

Correspondence ID: 573 **Project:** 11759 **Document:** 38106

Received: Feb,10,2011 10:13:45

Correspondence Type: Web Form

Correspondence: We (myself & 2 dogs) are respectful and frequent users of Crissy Fields, Fort Funston and Marin Headlands. The exercise benefits health & social well beings. We have connected with other recreational users, both human and dog, and have developed community relationships.

I reviewed the EIS draft and preferred plan. The following statements from your report are not accurate:

Appendix K: Past Present & Future: "Failed Snowy Plover clutches failed to high mercury level" Mercury from the ocean? From humans? What is the corolation of dogs being off leash?

K-1 "Crissy Fields restoration involved 18 acres of tidal marsh. This increased dog walking" Oddly omitted the human usage of picnics and child building sandcastles, wading and swimming in the estuary.

Page 1569 Cost Impact of \$1.5 million. Are these current costs or projected? Has the current roles and practices been reviewed? Who would pay for the increases?

Appendix G Law Enforcement Data: Totals for 2007 was 1535 incidents. Totals for was 2008 889 icidents. Obvious heavy numbers for "off leash" and minor numbers or no incidents of enviromental protection. Incidents decreased by almost 50% in 2008. How and why did these numbers decrease? Most importantly what is the ratio of these incidents to the total usage? Is it less than 1 percent?

I oppose and request no changes be made with current guidelines.

Correspondence ID: 574 **Project:** 11759 **Document:** 38106

Received: Feb,10,2011 11:54:42

Correspondence Type: Web Form

Correspondence: This would be a very sad change to San Francisco, San Mateo, and Marin Counties. Having these designated areas for dogs to be off leash has been a very safe and fair way to allow dogs and their owners to get the exercise and socialization they need to thrive. By limiting these areas as it is being

suggested, it will severely limit the amount of space needed for many large and energetic dogs to burn off energy and get the exercise they need. It would be a travesty to the mentioned counties to slash the areas dogs are allowed off leashes. Please re-consider making these changes, as taking away these open areas will be devastating to both the dogs and the dog owners. This would be a very sad change to San Francisco, San Mateo, and Marin Counties. Having these designated areas for dogs to be off leash has been a very safe and fair way to allow dogs and their owners to get the exercise and socialization they need to thrive. By limiting these areas as it is being suggested, it will severely limit the amount of space needed for many large and energetic dogs to burn off energy and get the exercise they need. It would be a travesty to the mentioned counties to slash the areas dogs are allowed off leashes. Please re-consider making these changes, as taking away these open areas will be devastating to both the dogs and the dog owners.

Correspondence ID: 575 **Project:** 11759 **Document:** 38106

Received: Feb,10,2011 14:39:58

Correspondence Type: Web Form

Correspondence: I am writing to comment on the policy towards dogs in the GGNRA. The policy overview in the document strikes me as correct; you are working to balance many competing interests. I write in order to represent one of those interests.

I have never liked dogs. I didn't grow up with dogs in our family. I was bitten in a scary incident as a child that left me very wary of animals. When I see a dog, I feel myself get tense. My discomfort with dogs was validated earlier this year when I went for a walk in my Portola Valley neighborhood on a public path by a neighbor's house, and their dog - off leash and with no owner in sight - came barreling down the driveway onto the public path and proceeded to bite me in the ankle. The bite drew blood, and it is clear that I will have a scar and, as you can imagine, I was terrified!

One of my great passions is hiking. To me, experiencing our fabulous bay area on foot is one of the great privileges of living here. I've been a board member of POST for several years (and a longtime donor), where I volunteer my time in order to continue to protect more land for future generations. I marvel at the magnificent job our public agencies, with the support of private philanthropy, have done in making this landscape available to all of us. By far, my favorite weekend activity is to hit the trails.

Recently, my husband and I went to McNee Ranch State Park, where we went to climb to Montara Mountain. I know this is a state park, and not GGNRA, but the same situation applies. Over the course of a near three

hour hike, we saw many other hikers, the vast majority with dogs. Only one of these dog owners had their dog on a leash. Every other dog owner was walking with the dog off leash. As I walked along, the dogs often would run up to me to explore, and I would reflexively cower. Owners would reassure me - "don't worry; he wouldn't hurt anyone!" and I had to point out that I had just been bitten by a dog, making me very nervous around dogs, and that just because they are confident in the dog doesn't mean that I was. And, by the way, there is a leash law. Honestly, these owners just didn't care that their dogs made me visibly uncomfortable.

I felt that my experience of the mountain had been ruined. Indeed, I felt like I was in a video game, watching around every corner to see when next I would find myself confronted by a dog off leash, as if being attacked by asteroids.

To be honest, my preference would be to ban dogs altogether from our parks. However, I do understand how important dogs are to many people, and the great pleasure they take in having their dog accompany them on the trails. To me, the requirement that a dog is on leash is a reasonable compromise between dog owners and dog dislikers. While I don't love a dog on leash when I encounter him, at least I do not feel threatened. If we must have a place where dogs go off leash, let's have a specific place, well sign-posted, such that people like me can simply avoid it.

If you establish rules that open our parks to off-leash dogs, I strongly believe that you have tipped the balance too far towards one interest group. Dog owners simply are not good at understanding the possible threat of their dogs, or the impact on other people. I deserve to hike these hills without anxiety and without fearing confrontation with defensive dog owners. It simply isn't fair that dog owners get more say on this subject.

Moreover, I'd love for you to figure out some way to police the dog rules. I know budgets are tight, but rangers issuing citations strikes me as a revenue opportunity! Let's have a great big fee for getting caught with an off-leash dog. If you send a ranger to Montara mountain some weekend, you will easily pay for his or her time. At the very least, I feel there should be better signs at trail heads saying that dogs are required to be on leash (and, by the way, that owners must carry out dog waste, which is a separate, but related, matter).

Correspondence ID: 576 **Project:** 11759 **Document:** 38106

Received: Feb,10,2011 16:54:33

Correspondence Type: Web Form

Correspondence: As a 25 year resident of southern marin county and a dog owner for as many

years, I believe it is unacceptable that the GGNRA would consider prohibiting dogs and/or off-leash dogs from the few remaining trails in this area. We as residents are willing to take full responsibility for keeping our dogs under voice command and carry a leash at all times while traveling on these trails and roads or enjoying the beaches. Southern Marin is a unique area in that we have the GGNRA in our backyard and within walking distance from our homes. As a woman and daily hiker it is a matter of safety when hiking alone that my dog is with me. Dogs kept away would be attackers away, whether animal or human.

Dogs are allowed on less than 1% of park trails and roads and beaches in and around the GGNRA. Consider increasing the cost of a violation ticket from \$200.00 to \$1,000.00.

Correspondence ID: 577 **Project:** 11759 **Document:** 38106

Received: Feb,10,2011 16:57:41

Correspondence Type: Web Form

Correspondence: Dear GGNRA:

I commend you for taking the bold step in making these proposals. I am tired of dog poop and dog owners who feel they have priority over people without dogs. It's difficult to enjoy these beautiful open spaces when they are overrun with dogs. There needs to be a balance and your proposals provide that. Thank you.

Lilian Lynch

Correspondence ID: 578 **Project:** 11759 **Document:** 38106

Received: Feb,10,2011 19:53:34

Correspondence Type: Web Form

Correspondence: I am an African American Lesbian who uses off-leash dog areas in the GGNRA daily. I have been walking my dog off-leash at Crissy Field for 6 years. I am a local resident in Sausalito, Ca. Dogs that are not adequately exercised can develop behavior problems such as barking, destroying property in the home, etc. Behavior problems are one of the primary reasons that people surrender dogs at shelters. San Francisco has a "No Kill" goal that no potentially adoptable animal in a city shelter (SF Animal Care and Control, SF/SPCA, Pets Unlimited). Representatives of the SF/SPCA have said that the Preferred Alternative will make it harder for the SF/SPCA to perform their mission to reduce surrenders to city shelters and make San Francisco a truly No Kill city. Off-leash play decreases the likelihood of dog aggression in dogs. In comments to the SF Animal Control and Welfare

Commission on 2/8/07, Jean Donaldson, then head of the Dog Training Program at the SF/SPCA and a nationally recognized author on dog behavior said: "There is not only no evidence that allowing dogs off-leash for play opportunities increases the incidence of aggression, to a person, every reputable expert in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access decreases the likelihood of aggression." She also said: "Interestingly, it could very well be that the safest dogs are those that attend off-leash dog parks." And she said: "There is no research demonstrating that dog parks or off-leash play contributes to any kind of aggression, including dog-dog aggression." The Preferred Alternative condemns every dog owners for the actions of a very few irresponsible owners. According to the GGNRA's own statistics, 94% of dogs do not chase birds (and most of those who did chased seagulls). Yet, all people with dogs will be excluded from a majority of Ocean Beach to "protect" birds. Focus enforcement on people who do not keep their dog from chasing birds rather than on excluding all people with dogs. The Preferred Alternative severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA. There is no off-leash access in San Mateo County in the Preferred Alternative and that must be changed. The Compliance-Based Management Strategy must go. This poison pill that will allow the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions will not work. The change would be permanent. A management plan should not come with a built-in nuclear option, which is what this is. It allows a relatively few bad players to undermine and destroy a traditional recreational use of the area. No number of responsible dog owners will stop what will become the inexorable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. Tens or hundreds of thousands of hours of incident-free dog walking will not matter. There should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status can be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined ? by volunteers biased against dogs? by surveillance cameras? ? is not included in the DEIS.

Correspondence ID: 579 **Project:** 11759 **Document:** 38106
Received: Feb,10,2011 19:53:51
Correspondence Web Form

Type:

Correspondence: I support the dog management plan and very much like permitting for more than three dogs

Correspondence ID: 580 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,10,2011 22:50:35

Correspondence Type: Web Form

Type:

Correspondence: I was born in San Francisco and have been visiting Fort Funston with my dogs for 15 years. I cherish the time that I spend with my dogs there. There is no place on earth comparable to Fort Funston. At least 95% of the people walking the trails and on the beach have dogs and I have never had an incident with any of them.

On the few occasions that I have tried to exercise my dogs in enclosed dog parks they have been harassed and attacked by other dogs. Many dogs can be aggressive on leash and making all the foot paths leash only can only lead more problems.

Please do not take away the best part of my city.

The Preferred Alternative severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created.

Save Fort Funston!

Correspondence ID: 581 **Project:** 11759 **Document:** 38106

Received: Feb,11,2011 08:37:52

Correspondence Type: Web Form

Correspondence: Please keep the parks free for dogs. Thank you

Correspondence ID: 582 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,11,2011 09:34:52

Correspondence Type: Web Form

Type:

Correspondence: Please do not further reduce the available area that dog owners have to let their dogs run and play off leash. Dog owners are finding it increasingly difficult to find open spaces where their pets can exercise. This activity is just as rewarding for the owner as for the animal. Please continue to allow us to take our pets to these areas that we enjoy so much.

Correspondence ID: 583 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,11,2011 12:54:35

Correspondence Web Form

Type:

Correspondence: The dog regulations should be consistent with congressional law set forth in 36 CFR 2.15 (a)(2). Leashes must be used. A Superintendent can only close areas to pets under 36 CFR 2.15 (a)(1), not allow off leash areas. Please be consistent with the rest of the National Park areas.

Correspondence ID: 584 **Project:** 11759 **Document:** 38106

Received: Feb,11,2011 15:25:01

Correspondence Web Form

Type:

Correspondence: I am a 36 year old resident of the Marina District for over 10 years. I have been utilized some of the designated areas to walk and play with my dog for over two years. We especially enjoy using the green space at Bay and Cervantes. There is plenty of room to roam and to be able to share with others and not bother those playing football/soccer or just relaxing.

I believe the proposed changes to off-leash laws represented in your document have several issues. Primarily, the Preferred Alternative area is way to limited. The restricted area would be insufficient for the dogs/owners. This would likely lead to conflicts as there would not be sufficient space. Restricting space would cause more issues than the unsubstantiated risks the document cites. I also believe this is a one-sided view - there is no provision for enlarging the off-leash areas and instead focuses on restrictions. There is limited space currently for dogs to play and the thought should be how to secure what is currently available and where else dogs should be allowed. I hope you reconsider these plans and think of the benefit to dogs and owners of being able to have sufficient areas is important.

Correspondence ID: 585 **Project:** 11759 **Document:** 38106

Received: Feb,11,2011 18:06:24

Correspondence Web Form

Type:

Correspondence: Thank you for the opportunity to comment on this plan.

I support Alternative D, with the exception that I would allow commercial dog walking, with permit etc as spelled out in the preferred alternative. I also support this alternative because it is the environmentally preferred alternative.

I could support Alternative B, which seems to place a lot of emphasis on leashed dogs, and I feel like this is a reasonable solution IF and only IF the vast majority of your law enforcement staff (the people on the ground) felt

confident that it was feasible for law enforcement to actually get dog owners to comply. I would like to know what level of involvement field-based law enforcement had in developing the alternatives and how realistic they believe the preferred alternative to be. In every place I have ever walked where there is a "leash law" it seems that the majority of dog owners are ignoring it. I fully support the concept of a compliance-based management strategy, wherein lack of compliance means a permanent change to a more restrictive management classification. Again, if I thought this was enforceable, I would support it. The enforcement records indicate that most non-compliance with dog-owners resulted in a warning rather than a citation. Warnings don't produce the same results that citations do, so I would hope that any enforcement strategy would allow a window of adjustment wherein warnings are issued (maybe a year), but then go to an all-citation based policy. Otherwise dog owners will not comply, and the experiences of other visitors and the resources will continue to be ruined.

Also, it is the very rare dog who is truly under "voice control", especially when animals or birds are involved (not the fault of the dogs--it is their nature), so I support the least amount of ROLAs possible, and support locating ROLAs only in areas with minimal or no wildlife. Non-dog walkers will avoid these areas, so they should not be in the middle of a main thoroughfare.

Thanks again for all the hard work and effort that has gone into this plan, and for allowing all Americans the opportunity to comment on the management of our national treasures. I do not live in San Francisco but I absolutely love visiting the area and have been to many of the beaches, parks, and walks listed in the plan. I also highly value the resources and the recreation that GGNRA protects. I am sure you will receive lots of comments from local dog owners, but I just want you to know that others have a stake, too.

Correspondence ID: 586 **Project:** 11759 **Document:** 38106
Received: Feb,11,2011 18:36:43
Correspondence Type: Web Form
Correspondence: I am writing to express my concerns with the dog management plan being proposal for Golden Gate National Recreation Area. I have been a resident of San Francisco for 8 years, the most recent year and a half as a responsible dog owner. My issues with the dog management plan:

- There are many conscientious pet owners in SF that will be severely punished by this plan, why wouldn't you instead institute a plan that addresses those owners who are not responsible (i.e. don't control their

aggressive dogs, don't clean up after them, etc.)

- I work full-time during the week and my dog enjoys a long dog walk with a group of 8-10 other dogs led by a passionate dog walker whose business would be jeopardized by the plan due to restrictions on the number of dogs he can have out with him as well as having a limited area to play (they currently go to Fort Funston every day to play).

If my dog is well behaved and I consistently pick up after him, I do not understand why our access to public parks should be so limited as proposed in the dog management plan.

Correspondence ID: 587 **Project:** 11759 **Document:** 38106

Received: Feb,12,2011 12:03:48

Correspondence Type: Web Form

Correspondence: I strongly oppose the proposed plan. The recommended action would severely restrict the ability of responsible dog owners (and their pets) to use and enjoy what are already very limited recreation areas. Yet, there doesn't seem to be any factual support for why the recommended option was chosen beyond anecdotal reasoning.

If it's for employee safety, then how many employees have been injured? If it's for environmental reasons, then explain how dogs are the culprit, but surfers, tour buses full of tourists, horse riders, bikers and hikers aren't. If it's to reduce conflicts, then how many and how severe have those conflicts been? (I've been taking my dog to all of these places for a greater part of the last ten years and have rarely, if ever seen any major conflict.)

If, as you say, the number of dog owners has grown dramatically since the 90s, then your proposal will limit the ability of a huge proportion of the regular users of these areas, for very poorly supported reasons. If a small percentage of dogs are causing issues, then the answer is to cite the owners of those specific animals. Not to punish the thousands of responsible owners who frequent these areas.

This is a pet-owner-hostile dictate that seeks to act first and ask questions too late. I intend to do whatever I can to prevent this proposal from passing.

Melanie Barti

Correspondence ID: 588 **Project:** 11759 **Document:** 38106

Received: Feb,12,2011 17:48:30

Correspondence Type: Web Form

Type:

Correspondence: I strongly urge you to restrict access by dogs as much as possible in sensitive wildlife areas. I run at Ocean Beach three mornings a week, and though the area is clearly marked as being for dogs on leash only, it has been my observation that over half of the dogs I see are not leashed, or at least the end of the leash is not being held by anyone. They run uncontrolled and have several times interrupted my run and caused me alarm. Their owners sometimes attempt to recall them, usually ignored by the dogs.

I believe the presence of so many dogs has been the cause of there being no birds visible on the beach other than sandpipers.

Thank you for your attention to these remarks.

Correspondence ID: 589 **Project:** 11759 **Document:** 38106

Received: Feb,12,2011 19:59:36

Correspondence Type: Web Form

Correspondence: As a dog owner in San Francisco, I am a regular and responsible user of the beaches at Fort Funston and Crissy Field.

Living in San Francisco is truly a wonderful city-living experience. An experience that I have been fortunate to have had for 33 years.

However, as a resident with a canine companion, there are so few places where it is acceptable for a dog to be off-leash. The City's dog parks attempt to meet this need, but falls short with the sheer number of dogs at each park.

Discovering the beaches at Crissy Field and Fort Funston was pure nirvana. Walking at the beach with my dog, rain or shine, is such a joy. To see her happy and free, bounding in and out of the water, lifts my spirits and makes me smile, no matter what else is going on in my life. We particularly relish the solace at the far southern area of beach at Fort Funston.

I don't know how we would replace this time together should these areas change to prohibit dogs off-leash. Getting in a car to cross a bridge, adding to pollution and traffic back-ups, not to mention stressful driving, would not be a great choice.

Please don't change the off-leash rules at Fort Funston and Crissy Field.

Correspondence ID: 590 **Project:** 11759 **Document:** 38106

Received: Feb,13,2011 13:21:59

Correspondence Type: Web Form

Type:

Correspondence: I have just come back from my weekly walk at Fort Funston with the my 3 dogs. Given the numbers of people out there with their dogs I cannot believe there is any justification for limiting access. It is obvious that we need more room not less.

I am a 30+ year resident of San Francisco. I own a home. I pay my taxes. I work in San Francisco, my employer pays taxes. I register my dogs -their licenses go to support facilities in SF. Walking my dogs is my recreation. It is in your charter to provide recreation for the people in the Bay Area.

I can understand with growing populations that you need to revisit your usage policies. But creating a 2400 page document for a policy that affects only 1% of the land you oversee seems misguided. I would think that being in the Bay Area you would have the same core values that those of us that live here have. We are a community, we want to meet the needs of each other, we care and we love our animals that now out number the children.

Alternative plans that I would like to see explore turn Fort Funston into a world-class dog-friendly park. Don't limit the space, instead make it a showcase. A park that others in the country would turn to for guidance in "dog management". Bring in other organizations to help.

- Tap into the California Academy of Sciences and Recology to create a dog poop to methane energy generator. - Tap into corporate dollars to help offset the costs of maintaining the park. The "pet economy" is sized at 41 BILLION dollars. Let sponsors contribute. Subaru, Toyota gets it - our park service needs a new model. And if it's not allowed in your charter, then maybe it's time to reevaluate or turn the land over to someone else.

For the spaces outside of Funston you should consider designated dog times. I've stopped going to Chrissy Field unless its before 8am. Just too many people. The "development" made it a destination area for families and less desirable for those of us seeking solace, time with nature and our dogs.

The "compliance" rule in the charter that says all designated areas can be revoked if you feel like not enough people comply (note the word "feel) does not meet the needs of the greater public and needs to be removed. You cannot take away my car if others speed down my street. It's the same line of thinking.

I truly hope a new alternative is drafted. We have an opportunity to become a model to the rest of the country vs creating division in our community and distrust of our Park services.

ID:

Received: Feb,13,2011 16:40:33

Correspondence Web Form

Type:

Correspondence: GGNRA,

As resident of Fairway Park (neighborhood adjacent to Mori Point), Sierra Club member for more than 20 years, former Youth Conservation Core member, concerned citizen and responsible dog owner, I am compelled to comment on the ill-conceived preferred dog policy for Mori Point as outlined on your website.

As many of my neighbors, part of my decision on choosing to live in Fairway Park was based on the proximity to open space, now GGNRA, Mori Point. I have walked my dog here on leash for 9 years, collected trash and reported illegal activity on this land to authorities on several occasions. These incidents have included off road vehicles and a dog attack by an uncontrolled, off leash dog. As encouraged by multiple GGNRA signs, I consider myself a steward of this land and most of my neighbors act in the same way. Fairway Park, by my most recent estimate, includes more than 40 dog owners many of whom frequently use Mori Point to walk their dogs. Unfortunately, I now feel my use of this space is threatened by a preferred policy which restricts on leash dogs to 2 trails passing through the space only. This policy is very confusing based on the environmental reviews on your website which state little to no impact on habitat by leashed dogs. Further confusing this preferred policy is the fact that trails which allow dogs on leash are all within 100-200 feet of trails which prohibit dogs even though they share the same watersheds and natural features.

Mori Point is bordered by the old quarry, Fairway Park neighborhood, Sharp Park Golf Course and beach promenade making it a multi-use recreational area, not a wilderness area. Restricting leashed dogs within Mori Point will likely not be well-accepted, making the regulation a difficult one to enforce. The enforcement plan of going to even more restrictive policy based on compliance rate of less than 75% is backward. If a regulation is not acceptable to a large percentage of people using the space, it is the regulation, not the people who are misguided. If dog policy is seen as inappropriate by many users, the land and habitat could be further damaged by people using the space during off hours.

I trust the GGNRA will take the above into thoughtful consideration when developing dog policy. I look forward to many more years of using this space with my dog and continuing to work with GGNRA to make this a safe place for people and animals while continuing to protect the habitat as all of these are possible.

Sincerely, Steve Alves

Correspondence ID: 592 **Project:** 11759 **Document:** 38106

Received: Feb,13,2011 16:43:27

Correspondence Type: Web Form

Correspondence: We live close enough to drive over to the city on weekends. It's nice to bring the dogs and let them run on the beach. I especially feel sorry for dogs that live in the city, they need the beach to have space to run and play since they don't have a lot of areas like this at home (probably). Also, San Diego has a nice dog beach that is popular and used by many. I think everyone should be responsible pet owners and pick up after their dogs. There's miles and miles of beach for people to use, let the dogs have this one:)

Correspondence ID: 593 **Project:** 11759 **Document:** 38106

Received: Feb,13,2011 18:09:26

Correspondence Type: Web Form

Correspondence: I am writing about the proposal to ban dogs and limit off leash activity at the Golden Gate National Recreation Area. The proposal will deny thousands of people in the Bay Area the ability to use these parks for recreation if this proposal passes. My family heads to Fort Funston at least once a week to enjoy the beach and trails with our dog. The parking lot at Fort Funston is jam packed on the weekends, where will these people go if they are turned away from using the park? Where does Frank Dean of the Golden Gate National Recreation Area expect people in the SF Bay Area to go instead? We still will need to exercise and socialize our dogs, and these off leash areas at the GGNRA have provided us a place to do just that. There just aren't enough spaces in the Bay Area that are open to people with dogs and taking away this vital and greatly appreciated recreation area is gong to contribute to new problems. Without a valid environmental impact report indicating that the current usage is having a negative impact on the GGNRA, there's no reason this proposal should be accepted. The proposal fails to consider how it will impact City parks and playground if people are forced off GGNRA land. It's just makes no sense to change the policy now, with more and more people living in the Bay Area and coming to the GGNRA with their dogs. Walking them on leashes around City streets is fine, but they need to run free with other dogs, and more importantly their OWNERS need spaces where they can go and enjoy their leisure time and bring the family. Please can you help stop the Golden Gate National Recreation Area from implementing it's plan to deny families like our access to the parks in the Bay Area? Thank you.

Correspondence ID: 594 **Project:** 11759 **Document:** 38106

Received: Feb,13,2011 20:49:26
Correspondence Type: Web Form
Correspondence: Please keep the rules as they are - our city dogs need a place to run and play

Correspondence ID: 595 **Project:** 11759 **Document:** 38106

Received: Feb,13,2011 21:29:04

Correspondence Type: Web Form

Correspondence: Dear Frank Dean, I am a healthy and responsible 75-year-old single woman with two well-behaved dogs. I live in Mill Valley. My principal source of exercise is walking my dogs off leash twice a day. I have never been to the dog park, it doesn't suit the needs of my dogs or myself for exercise. The DEIS provides me with more questions than answers. 7 Where's the science? The DEIS feels like a draconian measure imposed from On High.

7 What documentation do you have that dogs off leash degrade the environment? If you do have documentation, what are your numbers -- # of problem dogs vs. non-problem dogs? And what mitigation systems have you considered?

7 Have you considered addressing your enforcement resources at the problem situations rather than the needs of the majority of responsible dog owners?

7 Is this a political thing? Why else would you have come up with such a restrictive and undemocratic option (it would seem that responsible dog owners are in the majority on this issue).

7 On what observed basis do you propose these restrictions on the use of public open space?

The East Bay Park system seems to have a workable off-leash plan in place that has worked for many years. Colorado gives special licenses to well-behaved dogs. Why is Marin so hostile to dogs? I hope we can find a workable solution. Margaret Harding Mill Valley

Correspondence ID: 596 **Project:** 11759 **Document:** 38106

Received: Feb,13,2011 21:53:46

Correspondence Type: Web Form

Correspondence: It is important to adhere to option A. Dogs are an integral part of life in San Francisco. Its part of what makes San Francisco and the Bay Area so

special. People need their dogs and they need an expanse of natural space to enjoy and exercise their dogs. We can't afford to have children here - is there any wonder so many people have dogs. It is unthinkable that dogs would have to be on a leash as Chrissy Field. I walk there everyday and never witness any problems. If an owner doesn't clean up their dog's waste there are five people who will point it out to the owner. Professional dog walkers are another story. They have too many dogs at one time to take care of and they go into the airstrip where there are few people. In a sense they are running a concession on public land. There are other alternatives - control them! Don't punish all the people trying to get a little enjoyment in life because of them. As for individuals supervising their own animal, I don't see how its any different than bringing your child with you. I have been a non dog owner for most of my life. I believe that even non-dog owners benefit from the interaction of people and animals at Chrissy Field and other areas. Having a natural place to freely interact with animals is critical to the quality of life that is so important to living in the Bay Area. Do not allow any other option than A to be in force.

Correspondence ID: 597 **Project:** 11759 **Document:** 38106

Received: Feb,13,2011 23:22:41

Correspondence Type: Web Form

Correspondence: I consider myself a reasonable-minded dog owner, parent, and long-time citizen of San Francisco.

I have taken my dog, on- and off-leash, all around the city, including Fort Funston, Chrissy Field, and numerous dog parks. I have also spend time with my kids and family and friends all over the city.

My honest opinion is that many of these areas have been overrun by dogs, and are quite gross and unpleasant places--for anybody but a dog. My dog, and other dogs, deserve good outdoor spaces, and I love to see her run and enjoy the outdoors. But in Fort Funston, one of the most beautiful spots in San Francisco, it is impossible to avoid dogs. And dog poop. Same thing in many parts of Chrissy Field. Overwhelmed by dogs. It is irrelevant that most of the dogs and dog owners are well-behaved. These public spaces, many of them National Parks, have become dog playgrounds.

I believe that some limited, fenced portions of GGNRA should remain accessible to off-leash dogs. That is fair, appropriate, and pragmatic. Dogs need space. People need space. And wildlife needs space.

Furthermore, I believe I speak on behalf of the great majority of San Francisco residents, as well as tourists and other visitors. Most have neither the time nor the focused passions held by dog owners and dog professionals

regarding this issue.

Correspondence ID: 598 **Project:** 11759 **Document:** 38106

Received: Feb,14,2011 10:25:01

Correspondence Type: Web Form

Correspondence: My dog and I are frequent users of Crissy Field and Fort Funston. Although I am aware of some of the problems that have arisen due to off-leash dogs in these areas, I have personally never experienced them. The main reason, I believe, is that I go to these sites around sunrise, long before they are crowded and before professional dogwalkers arrive. My experience is that each place has a very regular and dedicated group of early arriverers. Because of the early hour and the low density of users, problems are extremely rare.

I urge those making this decision to consider the following:

1. Clearly posted guidelines help park users and enforcement personnel. When I first got a dog and began going to these parks, I found it very confusing that there were no posted guidelines for dogs and owners.
2. The patterns of use at these parks vary during the day. Please allow continued use of existing off-leash areas at these parks during low use hours, e.g. from opening until 8:30 am and for an hour or two before closing time. The more stringent regulations should apply during higher-intensity use since there is much higher potential for conflict.
3. Make and enforce guidelines for the number of dogs allowed per walker. It is reasonable that "professional" dog walkers, who are, after all, making commercial use of the parks for their own profit, should be held to a strict standard, perhaps including some kind of registration/licensing requirement, with the provision that violations could result in losing their license.

Thank you for your consideration of these comments.

Jan Elizabeth

Correspondence ID: 599 **Project:** 11759 **Document:** 38106

Received: Feb,14,2011 10:41:02

Correspondence Type: Web Form

Correspondence: I would like to maximize the opportunity for walking dogs under voice control. The plan is too strict.

Correspondence ID: 600 **Project:** 11759 **Document:** 38106

Received: Feb,14,2011 12:05:12

Correspondence Type: Web Form

Correspondence: This email is in support of OFF LEASH recreation for dogs (and their owners) in the Golden Gate National RECREATION Area. Until recently, the areas outlined for off-leash recreation in the GGNRA included all or part of: Ocean Beach Fort Funston Burton Beach Baker Beach Crissy Field and Beach West Pacific Avenue Rodeo Beach Oakwood Valley Muir Beach. These recreation areas are extremely important to the people of the San Francisco Bay Area as well as the visitors to the San Francisco Bay Area. Adequate space to recreate one's self (as well as our pets, companions, and/or service animals) is crucial to our, the People's, right and need to the pursuit of happiness. Currently, there exist no reasons (pertaining to safety, ecology, or otherwise) which should merit revision to the long standing policies concerning dogs, leashes, their owners, and the Golden Gate National RECREATION Area. Please give my views and needs, as well as the views of a great many San Franciscans and dog owners the world over, the respect our views and needs deserve. To do otherwise is to transcend our rights to enjoy our public lands. Most Sincerely, Christopher D. Raleigh

Correspondence ID: 601 **Project:** 11759 **Document:** 38106

Received: Feb,14,2011 12:07:21

Correspondence Type: Web Form

Correspondence: The proposed GGNRA dog leash regulation is far too restrictive. As a native of San Francisco and a dog owner I am saddened by the lack of vision this proposal brings to the table. 1 in 3 San Franciscans owns a dog and the impact upon our city would be great if off leash recreation were limited as proposed. Imagine all of the dogs overwhelming the city parks!! We need the national recreation areas and our dogs need the space to run and play. Please reconsider your proposal - police the bad seeds but allow the overwhelming majority of good dogs and good dog owners to enjoy OUR parks.

Sincerely, Mike Shaw

Correspondence ID: 602 **Project:** 11759 **Document:** 38106

Received: Feb,14,2011 12:13:15

Correspondence Type: Web Form

Correspondence: I have spent over 30 years enjoying the GGNRA - a priceless resource for the Bay Area. I have participated as a runner, hiker, biker and dog owner.

I believe the current rules adequately address the needs of all participants. The vast majority of GGNRA users are respectful of everyone's right to enjoy this wonderful resource.

The new rules for dog owners are not necessary - most dog owners are very conscientious of others rights not to be impacted by their pets.

There is always a small group from every user group that doesn't follow the rules but that is not a reason to punish the majority with new overly restrictive rules for dog owners.

Thanks you, Tim.

Correspondence ID: 603 **Project:** 11759 **Document:** 38106
Received: Feb,14,2011 12:43:04
Correspondence Type: Web Form
Correspondence: Dear Sir or Madam,

I have been a long time resident of the city of San Francisco for the past 24 years and have to say that the proposed legislation to limit the current off leash dog policy for the GGNRA is very disturbing.

I have frequented many of the Park's dog management areas of concern over my lengthy residence in San Francisco and have never experienced or encountered any troubling issues between dogs, dog owners and the multitude of people enjoying the GGNRA park lands. I have biked, hiked, jogged and walked extensively throughout the GGNRA parks in the City and feel the current off leash dog policy is essential to maintaining the much needed open space areas for all San Francisco residents and their pets.

I feel that the push to limit the off leash dog walking areas in the GGNRA listed locations is an attempt by a few special interest groups looking to secure certain park lands for their individualized/ special interest use only. An example of one of these groups would be the "hand gliders" using the Fort Funston area for their sport specific activities.

I realize that certain dog owners are negligent in their control and command over their dogs and should be held accountable for any negative actions caused by their irresponsibility. To reduce the current off leash dog walking area by nearly 75% for all of the dog owners who are responsible and looking to enjoy the GGNRA parks to their fullest extent is not a justifiable response to the problems that exist with the current off leash dog walking

policy.

The amount of money proposed to enforce the new policy is simply ridiculous given the cash constraints plaguing most government agencies. San Francisco has always been a friend to its citizens who own dogs by providing ample areas within its borders for dogs and their owners to enjoy and experience some degree of off leash freedom. I strongly encourage any member of the GGNRA board attempting to rule on this decision to go to Fort Funston on a pleasant San Francisco weekend to see for themselves how many people are enjoying the park both with and without their dogs.

Please keep the current off leash dog walking areas available for dogs and their owners to enjoy the GGNRA. Please let San Francisco stand for a place that values its diverse population and will continue to be one of the few dog friendly major cities in the United States that will continue to preserve the precious few areas that remain designated for the use of all of their residents (dogs included).

Thank you for your time.

Kind regards,

Scott Bruner San Francisco, CA 94127

Correspondence ID: 604 **Project:** 11759 **Document:** 38106

Received: Feb,14,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As a home owner in San Francisco, we have always paid our taxes. As with many dog owners in SF, we have a very small yard and depend on public spaces for exercising our dog. Inasmuch as I understand that SF is a city with about one dog for every 4 citizens, I believe that dog owners and dog walkers have proven to be very sensitive and respectful of public spaces. I hardly ever come across abandoned dog poop or viewed altercations between dogs. We pay taxes, we clean up after our dogs, we restrain our dogs on sidewalks, etc. WE HAVE WELL BEHAVED DOGS THAT ARE COMPENSATED BY THE OCCASIONAL RUN AT THE BEACH, THE SWIM TO GO FETCH THE BALL. PLEASE DON'T TAKE THAT AWAY FROM OUR DOGS. They are our best friends, they are the only ones we know who offer us unconditional love. They are a very important part of our lives. They deserve to not only be represented but also deserve to be compensated for their good behavior as good citizen. They do not pay taxes but they do make your dog owning taxpayers happier people.

Correspondence 605 **Project:** 11759 **Document:** 38106

ID:**Received:** Feb,14,2011 18:57:11**Correspondence Type:** Web Form**Type:****Correspondence:** Dear Frank Dean, I am a healthy and responsible 75-year-old single woman with two well-behaved dogs. I live in Mill Valley. My principal source of exercise is walking my dogs off leash twice a day. I have never been to the dog park, it doesn't suit the needs of my dogs or myself for exercise. The DEIS provides me with more questions than answers. 7 Where's the science? The DEIS feels like a draconian measure imposed from On High.

7 What documentation do you have that dogs off leash degrade the environment? If you do have documentation, what are your numbers -- # of problem dogs vs. non-problem dogs? And what mitigation systems have you considered?

7 Have you considered addressing your enforcement resources at the problem situations rather than the needs of the majority of responsible dog owners?

7 Is this a political thing? Why else would you have come up with such a restrictive and undemocratic option (it would seem that responsible dog owners are in the majority on this issue).

7 On what observed basis do you propose these restrictions on the use of public open space?

The East Bay Park system seems to have a workable off-leash plan in place that has worked for many years. Colorado gives special licenses to well-behaved dogs. Why is Marin so hostile to dogs? I hope we can find a workable solution. Margaret Harding Mill Valley

Correspondence ID: 606 **Project:** 11759 **Document:** 38106**ID:****Received:** Feb,14,2011 22:55:13**Correspondence Type:** Web Form**Type:****Correspondence:** I have been a resident of San Francisco for 17 years and enjoying the GGNRA off-leash dog areas for the past 6 years. I go to either Fort Funston or Crissy Field at least 2-3 times every week with my Golden Retriever. These trips to run and swim are truly special occasions for both of us and by far the happiest times for my dog.

I have serious concerns about the GGNRA's off-leash proposal, particularly, the "poison pill" of the Compliance-based Management Strategy. A management plan should not come with a built-in nuclear option, which is

what this is. This strategy is fundamentally unfair and unbalanced since it -

? Allows the off-leash status to be changed in only one direction (toward more restriction) with no possibility of increased access in the future.

? Circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made.

? Omits critical information about how compliance will be determined, allowing room for misunderstanding and misinterpretation.

? Permits the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions.

? Makes the change permanent. While there should be, and are, enforced penalties for bad actors, the vast majority of people who do not act badly should not be penalized for the bad actions of a few. No number of responsible dog owners will stop what will become the inevitable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. This component MUST be removed from the proposal.

Correspondence ID: 607 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 10:00:25
Correspondence Type: Web Form
Correspondence: Fort Funston & like areas that currently allow off leash areas for dogs should not be changed. This unique recreational area for people & dogs is renowned for the freedom of off leash for human & animal interaction & recreation. Dogs are not endangering the areas for flora/fauna. This is an area that is used for residents & non residents alike - these areas invite people to really get off their butts & go explore the outdoors with their often times best companions - their beloved dogs.

Correspondence ID: 608 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 10:58:43
Correspondence Type: Web Form
Correspondence: This proposal is ridiculous and in violation of the promises that the federal government made in regards to providing significant access for dogs in our parks here in San Francisco when your organization was made. I've called my district supervisor and asked her to come out against this extremely restrictive and unnecessary policy change.

I hope that in the future you can put my hard-earned tax money to better use and stop wasting our time.

Correspondence ID: 609 **Project:** 11759 **Document:** 38106

Received: Feb,15,2011 11:10:59

Correspondence Type: Web Form

Correspondence: This would be a very sad change to San Francisco, San Mateo, and Marin Counties. Having these designated areas for dogs to be off leash has been a very safe and fair way to allow dogs and their owners to get the exercise and socialization they need to thrive. By limiting these areas as it is being suggested, it will severely limit the amount of space needed for many large and energetic dogs to burn off energy and get the exercise they need. It would be a travesty to the mentioned counties to slash the areas dogs are allowed off leashes. Please re-consider making these changes, as taking away these open areas will be devastating to both the dogs and the dog owners.

Correspondence ID: 610 **Project:** 11759 **Document:** 38106

Received: Feb,15,2011 11:17:07

Correspondence Type: Web Form

Correspondence: I am writing to support stricter leash laws for dogs in the Golden Gate National Recreation Area. The GGNRA is a national treasure that should be enjoyed by all and we should use this precious resource to protect the wildlife that finds habitat there. Dog walking is a legitimate recreational pastime, just like many others, but it should not take precedence over other forms of recreation at the GGNRA. No one should ever have to worry about being bitten or knocked over by someone's pet when they visit the GGNRA. Visitors to the GGNRA should be able to find some peace and calm and not have to be vigilant about dogs running at them. Pets should not be put at risk to run into traffic or other hazards. The wildlife in GGNRA should not be harassed by domesticated pets.

Some recreational activities, like walking, birding, or sitting and reading, have very few impacts and we let them occur almost anywhere. Others, like mountain biking or golf, have much greater impacts on other people and natural areas and we rightfully regulate where they can occur. In my opinion, letting dogs run off-leash is one of these impactful recreation activities that should be limited to specific areas where I can choose not to go. Just as I wouldn't choose to go have a picnic on a golf course where I would need to be constantly vigilant to flying golf balls, I would not choose to visit an off-leash dog area where I would have to constantly be vigilant to

curious and rambunctious dogs.

Therefore, I think that off-leash dog recreation should be limited to a few sites that do not infringe on the other uses of the GGNRA and I would strongly support Alternative D in the Environmental Impact Statement. Alternative B has its merits, as I believe consistent policies across national park areas will make so everyone knows what to expect and how to act when visiting. No matter which alternative is chosen I strongly support strict enforcement so that all may continue to enjoy the amazing natural areas of the GGNRA.

Correspondence ID: 611 **Project:** 11759 **Document:** 38106

Received: Feb,15,2011 11:53:52

Correspondence Type: Web Form

Correspondence: I am a homeowner in San Francisco. I have served my county as a teacher's aid, teacher and social worker for more than 20 years. Being able to walk my dogs in the county's beautiful parks has been a way to renew myself so as to be able to go on contributing thru my work to the community. For so many people, dogs are a way to enjoy and treasure nature and to be personally invested in preserving the wildness and beauty of our parks. How about charging a monthly fee for an off leash dog-walking permit? This would create needed revenue for upkeep of the parks. I would be glad to pay a fee to be able to continue to use the parks with my dogs.

Correspondence ID: 612 **Project:** 11759 **Document:** 38106

Received: Feb,08,2011 00:00:00

Correspondence Type: Letter

Correspondence: Frank Dean, General Superintendant Golden Gate National Recreation Area Bldg. 201 Fort Mason, San Francisco, CA 94123

Dear Mr Dean,

The "dog situation" has become horrible for many of the older population and children (more dogs than children in San Francisco).

I can no longer enjoy walking on ocean beach. Twice I have been attacked by unleashed dogs, and bitten once. No longer are there the seabirds there used to be. Barking, aggressive unleashed dogs are everywhere. Their owners are defensive and often nasty if I tell them to leash their dogs, or move away.

Crissy Field is like a mine field for me. Everywhere are barking aggressive

dogs -- often 3 or 4 on a leash. I can no longer bring my grandchildren there, they become too frightened and often are jumped upon by dogs.

The only place I feel safe and comfortable is the Botanical Gardens with its wonderful sign: "No Dogs Allowed".

Your Dog Management Plan can't come soon enough for me. Please don't be intimidated by the raucous dog owners who aren't too different from gun owners.

I'm looking forward to the day I can walk on the beach, Golden Gate Park, Chrissy Field etc. and not be intimidated by barking aggressive dogs and often their equally belligerent owners.

Please do not "water down your" Plan because of pressure from dog owners. They will flood meetings (as before), bringing their dogs and their demands.

Good Luck

Berenice Palmer

Correspondence ID: 613 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Sup. Dean,

The GGNRA is an urban park, where off-leash dog walking by responsible pet owners has always been allowed. To change a long-established past practice is unfair.

If the GGNRA cannot abide by the terms under which San Francisco ceded its lands, then the GGNRA should turn the lands back over to San Francisco.

I strongly object to your new dog management plan.

Steve Rubenstein

Correspondence ID: 614 **Project:** 11759 **Document:** 38106
Received: Jan,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent:

The signs of dogs running free on our beaches is so life enhancing. And the dogs have a terrific time, too.

Why alter such a win-win arrangement?

Best,

James Smith (and Bingo)

Correspondence ID: 615 **Project:** 11759 **Document:** 38106
Received: Feb,02,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

Dogs have always been allowed at Fort Funston off leash. Changing the rules isn't fair. You can expect massive civil disobedience.

Sincerely,

Pauline Fox San Francisco

Correspondence ID: 616 **Project:** 11759 **Document:** 38106
Received: Feb,07,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My ancestors settled in Sonoma/Marin coastal areas in 1850. Throughout my life, I and my family have loved the region; exploring the unique setting long before Point Reyes + Golden Gate became national gems. The ecological variety of such chosen space should be protected for its uniqueness.

I have witnessed loose dogs tear up flower fields, trash shorebird nests, + even chase a yearling black-tail deer over a cliff to its death. I experienced a grandchild being knocked over on a beach, by a rampaging mongrel. Dogs should be leashed + more importanting, prohibited from sensitive bio-diversities.

Sincerely,

Ken Roe

Correspondence ID: 617 **Project:** 11759 **Document:** 38106

Received: Feb,04,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

Regarding the proposed dog rules, please keep in mind that the GGNRA serves an urban area populated by people and dogs, both of whom like to access the beaches and parks. The GGNRA is different than other national parks in this way. Please do not impose undue limits on dogs and their people.

Thank you,

Kecia Talbot

Correspondence ID: 618 **Project:** 11759 **Document:** 38106

Received: Feb,09,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean

Please do not chance the GGNRC to a leash park.

It is not a case of dog against human, as some people put it. It's for dog owners and non-dog owners, and FUTURE dog owners.

A lot of people won't even go outdoors if it hadn't been for their dogs. The parks are there for the dogs to romp around, and for dog owners to exercise WITH their pets.

It is also very much for people who don't own dogs but would like to enjoy dog company. These are people for one reason or another cannot have a dog'cannot afford it, don't have the space or time, work too long hours. They go to these leash free parks to enjoy man's best friends.

As for the very small percentage of naughty dogs or irresponsible dog owners, it's like punishing every adult male because there are a few rapists lurking around in our society.

If there are issues need to be address, dog owners will be happy to chip in their part to make it work.

Please keep the dogs parks leash free, for human and for dogs. Sincerely,

Seik Yee Lau

Correspondence ID: 619 **Project:** 11759 **Document:** 38106
Received: Feb,09,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean Superintendent GGNRA Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

San Francisco shares its name with Saint Francis of Assisi, the patron saint of animals. Restricting the freedom of pets at Baker Beach, or any of the otehr GGNRA sites, would seem unfitting. Residents of Sea Cliff and neighboring areas of the City have been taking their dogs to Baker Beach and recreating for 40+ years, and we believe that the 1979 pet policy should be grandfathered into the current dog management plan. Traditional usage should play a crucial factor when drafting new policy, Baker Beach is a low conflict, moderate usage site.

The contiguous beach, China Beach, has a no dog restriction. I have been advised there are no endangered birds and no sensitive nesting habitat at Baker. Those whose dogs use the beach have been careful to keep their dogs off the fenced salt grass area. This ten-acre site has no snowy plovers. I consider myself an environmentalist, and there is no natural resource that is being damaged or destroyed at Baker. The dogs are running on sand. The dog owners pick up the trash on the beach and are not interfering with family activities (in comparison to the nude men running around at the far end of the beach). That overt behavior seems more disturbing to children than any dog. I have seen illegal camping with tents and fires, pot smoking, discarded cigarette butts and alcohol bottles (some broken and dangerous) at the beach which are cleaned up by dog owners.

There is a low level of visitor activity in the early hours when many people walk with their dogs on the beach in the early morning (especially as it is usually foggy). The only other people there are the occasional fisherman or surfers. How are dogs improper? Private dog owners are respectful of visitors, use voice control and generally avoid the beach at peak picnic/sunbathing hours.

The City has more pets than children. There is a valid fair argument for dogs recreating off leash on the GGNRA. Where will all the local residents go? In addition to practicing good dog etiquette, they are good stewards of Baker

Beach, Many clean up after high traffic weekends and party nights. One dog owner even facilitated the recovery of a drowning victim early one January morning. Baker has dangerous riptides..

I do not understand why dogs are singled out as a high profile controversy when natural resources are impacted in GGNRA by fireworks, Blue Angels, cargo ships spewing oil, cruise ships polluting the Bay, etc.

The key word in GGNRA is recreation. Walking with their dogs is how many get exercise and fresh air. It is a great tragedy that in the name of the National Park Service you would take away that privilege. San Francisco is a special case where these dog walking areas have become an integral part of the local and visitor experience.

Respectfully yours.

Robelt Keeney

Correspondence ID: 620 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear GGNRA

I oppose Section 2 of H.R. 6305, a bill introduced in Congress by Nancy Pelosi, that will change the name of the Golden Gate National Recreational Area (GGNRA) to the "Golden Gate National Parks." While this seems innocuous, it is not. The GGNRA was created by Congress in 1972 to: "provide for the maintenance of needed recreational open space necessary for urban environment and planning." For decades, recreation and habitat restoration co-existed without conflicts. In recent years, however, GGNRA staff have instituted policies that have closed large areas of land to recreational uses, in direct opposition to the recreation mandates contained in the legislation that created the GGNRA. If the name change passes, GGNRA staff will claim that, by that action, Congress has authorized the overturning of the enabling legislation and removed the original protections for recreational access. Without these protections, GGNRA staff will be free to severely restrict -- if not outright ban -- access throughout the GGNRA to ALL recreational users.

The GGNRA controls 61% of the open space in San Francisco, including all of the beaches. The GGNRA is San Francisco's backyard, and provides much needed recreational open space for Bay Area residents. San Francisco is the second densest city in the US, and a tremendous need for recreational open space exists. For decades, the GGNRA has helped provide that. If the

name change is passed, however, that access will be lost.

Please oppose the name change for the GGNRA, and remove Section 2 from H.R. 6305.

Sincerely,

Tracy Jung Dog lover, dog owner, and VOTER

Correspondence ID: 621 **Project:** 11759 **Document:** 38106
Received: Feb,03,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean Superintendent GGNRA Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

San Francisco shares its name with St. Francis of Assisi, the patron saint of animals. Restricting the freedom of pets at Baker Beach, or any of the other GGNRA sites, would seem unfitting. Residents of Sea Cliff have been taking their dogs to Baker Beach and recreating for 40+ years and, we believe that the 1979 pet policy should be grandfathered into the current dog management plan. Traditional usage should play a crucial factor when drafting the new policy. Baker Beach is a low conflict, moderate usage site.

The contiguous beach, China Beach has a no dog restriction. I personally have spoken to a NOAA bird population field surveyor at Baker Beach, and he assured me that there were no endangered birds and no sensitive nesting habitat at Baker. We have been careful to keep our dogs off the fenced salt grass area. This ten-acre site has no snowy plovers. I consider myself an environmentalist, and there is no natural resource that is being damaged or destroyed at Baker. The dogs are running on sand. The dog owners pick up the trash on the beach and are not interfering with family activities in comparison to the nude men running around at the far end of the beach. That overt behavior seems more disturbing to children than any dog. I have seen illegal camping with tents and fires, pot smoking, cigarette butts and alcohol bottles (some broken and dangerous) that we clean up. When I have come across a dead or injured sea lion or seal, I have called the Marine Mammal Center. During the oil spillage crisis, we did our part to pitch in.

There is a low level of visitor activity in the early hours when I walk with my dog on the beach at dawn (especially as it is usually foggy). The only other people there are the occasional fisherman or surfers. How are dogs improper? Private dog owners are respectful of visitors, use voice control

and generally avoid the beach at peak picnic/sunbathing hours. The city has more pets than children. There is a valid fair argument for dogs recreating off leash on the GGNRA. Where will all the local residents go? In addition for practicing good dog etiquette, we are good stewards of Baker Beach. Many of us clean up after high traffic weekends and party nights. One dog owner facilitated the recovery of a drowning victim early one January morning. Baker has dangerous riptides and we have all tried to warn young swimmers. The Baker Beach dog group is self policing. If a dog exhibits inappropriate behavior the other dog owners step in.

I do not understand why dogs are singled out as a high profile controversy when natural resources are impacted in GGNRA by fireworks, Blue Angels, cargo ships spewing oil, cruise ships polluting the Bay, etc.

The key word in GGNRA is recreation. Walking with my dog is how I and many others get exercise and fresh air. It is a great tragedy that in the name of the National Park Service you would take away that privilege. San Francisco is a special case where these dog walking areas have become an integral part of the local and visitor experience.

Respectfully yours,

Deborah Hatch

Correspondence ID: 622 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear

I oppose Section 2 of H.R. 6305, a bill introduced in Congress by Nancy Pelosi, that will change the name of the Golden Gate National Recreational Area (GGNRA) to the "Golden Gate National Parks." While this seems innocuous, it is not. The GGNRA was created by Congress in 1972 to: "provide for the maintenance of needed recreational open space necessary for urban environment and planning." For decades, recreation and habitat restoration co-existed without conflicts. In recent years, however, GGNRA staff have instituted policies that have closed large areas of land to recreational uses, in direct opposition to the recreation mandates contained in the legislation that created the GGNRA. If the name change passes, GGNRA staff will claim that, by that action, Congress has authorized the overturning of the enabling legislation and removed the original protections for recreational access. Without these protections, GGNRA staff will be free to severely restrict -- if not outright ban -- access throughout the GGNRA to

ALL recreational users.

The GGNRA controls 61% of the open space in San Francisco, including all of the beaches. The GGNRA is San Francisco's backyard, and provides much needed recreational open space for Bay Area residents. San Francisco is the second densest city in the US, and a tremendous need for recreational open space exists. For decades, the GGNRA has helped provide that. If the name change is passed, however, that access will be lost.

Please oppose the name change for the GGNRA, and remove Section 2 from H.R. 6305.

Sincerely,

Tracy jung; Dog owner, Dog Lover, and VOTER

Correspondence ID: 623 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 13:52:32
Correspondence Type: Web Form
Correspondence: I support further restricting off leash access to dogs in the parks. I own a dog but I am concerned that the dogs are damaging to wildlife habitats.

Correspondence ID: 624 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 13:55:17
Correspondence Type: Web Form
Correspondence: To Whom It May Concern: I am writing to express concerns about the current version of the GGNRA Draft Dog Management Plan / Environmental Impact Statement. I am a dog owner living in San Francisco. I had never visited the GGNRA before my wife and I got our dog nearly two years ago. Since then, the availability of off-leash areas in the GGNRA has improved our physical health through outdoor exercise, improved our appreciation of the city and the environment, and allowed us access to a rich and welcoming community of fellow dog-owners.

After reading about the proposed plan, I developed many concerns about the way in which the document was written and the information on which its conclusions are based as well as the potential ramifications of its implementation. Specifically, the document's suggestions for alternative locations for off-leash dog-walking suggests the authors did not fully research alternative locations as some suggested locations are currently not designated off-leash areas. Further, the cited scientific research does not consider numerous additional studies that reached dramatically different

conclusions about the impact of off-leash dogs on the environment.

Along those lines, my personal experiences in the GGNRA have revealed dog-owners and dog-walkers to be among the most environmentally conscious people in the city. Virtually all people who use the GGNRA value it very highly and take every measure to protect it and all of its inhabitants. Combined with evidence that off-leash recreation has little to no negative environmental effect, I am forced to conclude that the costs of restricting off-leash recreation far outweigh the benefits.

Finally, and most-concerning, the document is written in such a way that once enacted, further restrictions of public use of the space can be added without public comment based on little or no evidence.

The access to off-leash recreation is of critical importance to my family and me as well as thousands of other dog-owners who live in and around San Francisco. While I recognize that there are areas in which restrictions of these activities make sense, the precedent set by this document is that areas that have been designated for off-leash recreation for decades can suddenly be labeled as restricted with little or no reason or public discourse. Additionally, given the number of dog-owners in the San Francisco area and the demonstrated benefits of off-leash recreation and socialization both to dogs and their owners, the cost of such restrictions to the city and its residents has the potential to be dramatic. Public health and happiness will be severely affected and there is likely to be overcrowding in other areas of the city that will be overwhelmed by the sudden influx of dogs and dog-owners who will continue to seek areas that allow off-leash recreation.

While the protection of our environment is a key concern of mine, the GGNRA Draft Dog Management Plan / Environmental Impact Statement does little to nothing to accomplish protection while simultaneously adding the potential for significant downgrades to public health, civic pride, and public discourse.

Correspondence ID: 625 **Project:** 11759 **Document:** 38106
Received: Feb,02,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201 Fort Mason San Francisco, CA 94123-0022

Subject: Support for Restricting Off-leash Dog Walking in San Francisco Parks

Dear Mr. Dean,

I whole heartedly agree with restricting off-leash dogs in public parks to designated enclosed dog area.

I like dogs, but my experience has been that owners allow them to encroach into other people's space. When asked to please call or hold your dog, a typical response is "it's okay, he doesn't bite" and then the owner doesn't do it. The problem is that sometimes a dog takes a threatening stance, even if it doesn't go as far as biting. Sometimes the person making the request has fear issues, or has another animal with them that may have kennel cough, or not have all its shots, or even be dog reactive.

Also, I've seen dogs trip runners or even lunge at them. I've seen them sniffing people who are trying to sun bathe or snatching picnic food. I've experienced dog owners playing fetch inconsiderately by throwing the ball too close to me and their dog running across my things.

And nothing pisses me off more than seeing my 75 year old mother frozen in fear and trembling because her phobia is triggered by a dog coming up to her, all the while hearing the owner blithely saying "it's ok, he's friendly." No, it is NOT OK. I want them to hold their damn dogs away from my mother. She has a right to our parks and at her age needs the exercise more than ever.

Thank you for your attention. I appreciate all that you do for our parks.

Sincerely, Elayne Sara McBarnette

Correspondence ID: 626 **Project:** 11759 **Document:** 38106
Received: Feb,02,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Re: Concerns with Allowing Off-Leash Dogs under the Preferred Alternative

Mr. Dean,

As a long-time user of the Golden Gate National Recreation Area and a dog owner, would like to express my strong concerns about the proposal to allow dogs to roam leash- free. The preferred alternative, as written, allows national park land to be used for an intensive recreational use that is

inconsistent with conservation and would result in public safety hazards and limitations on the broad community's enjoyment of the public parks, as well as limiting equal access for disabled communities and communities of color.

Most seriously, the proposal to let dogs go off-leash would have a significant impact on our efforts to preserve wildlife and habitat of the GGNRA. Dogs can cause extreme damage to the volunteer-driven restoration efforts across the parks. In Crissy Field, for instance, the off leash dogs have been a serious obstacle in the restoration efforts and have been detrimental to efforts to protect native species. Studies have shown that some native species, such as the Snowy Plover, refuse to nest in an area where dogs have been for up to 2 weeks following the presence of a dog. Although not always visible, this policy would have significant and irreversible impact on a species in decline.

The National Parks are "Parks for All Forever," and allowing a use that significantly degrades the landscapes, prevents use by a majority of visitors, and causes irreparable harm to the flora and fauna is inconsistent with this vision and should not be allowed.

Nika Lapis

Correspondence ID: 627 **Project:** 11759 **Document:** 38106
Received: Feb,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Bldg. 201 San Francisco, CA 94123-0022

Off leash dogs at Muir Beach

Sir,

It is a JOY to watch the dogs play at Muir Beach. All sizes, all breeds, free as the wind, they bound with such infectious exuberance. One marvels at their energy and laughs at their antics as they romp. The 'water dogs' splash into the waves. Camaraderie, if the word can be used to canines, is paramount. The beach is too much fun to go off hunting wildlife and except for the water-loving dogs, most do not really want to jump into the unknown, cold depths of the creek or lagoon where the waterfowl ply. Forbidding off-leash dogs on the approaches to the beach, if you like, would seem to take care of any possible canine miscreants on the way to and from the beach. I think the gulls on the beach can take care of themselves.

Why deprive the dogs of a free and wonderful place to romp? Why rob the

owners of the pleasure of watching them and those who are not owners but enjoy the spectacle too? Why, most of all, subordinate the enjoyment of the majority to the peevishness of the dog-disliking minority or the exaggerated zealotry of the protectors of wildlife? Most of us, dog owners or not, appreciate the presence of wildlife and will ensure it remains safe.

So, please, CANCEL your plans to impose a leash law and save places like Muir Beach from the stifling rules of urbanization.

Yours truly,

Sheila M. Davainis

Copy: Marin I.J.

Correspondence ID: 628 **Project:** 11759 **Document:** 38106
Received: Jan,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean General Superintendent, Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco 94123-0022

RE: Rodeo Beach & Marin Headlands (dog walking proposals)

Dear Mr. Dean:

I understand about the GGNRA's (Park) concern about public safety, protecting the Park's land, and the need for balance activities of the Park's land and resources. However, as in most public recreational areas, the majority of people are law abiding and conscientious. Although, there are a few people "at times" who do not respect the privileges of public open space land (lack of proper dog control, littering, ect.).

Living in Marin County, I go to Rodeo Beach and run in the Marin Headlands at least once a week with my dogs and have been doing so for the past 20 plus years. Never have I seen a bad, aggressive, or disorderly dog. "If" there is someone with a dog, the dog is playing and having a good time without troubling anyone. Furthermore, every dog owner I've encountered has always been nice, responsible, and cleans-up after their pets. As for Rodeo Beach, off lease dogs are a part of the beach. People know and expect to see a dog running along the shore and frolicking in the surf. Everyone, adults and children, enjoying seeing a happy dog(s) playing at the beach.

Solution: Rodeo Beach & Marin Headlands My suggestion for Rodeo Beach

and the Marin Headlands (it is where I frequent and am most familiar) is to continue to allow dogs to be off lease and under voice control. However, if an owner is not responsible in adhering to the concerns/rules of the Park, then they should be ticketed and fined at a high monetary penalty to serve as a deterrent.

Having your dog off lease at Rodeo Beach (especially when the beach is 95% of the time vacant except for maybe a small handful of people) is a very special place for dogs and their owners. Please don't let the majority of us good citizens suffer and be penalized for the improper actions of a small few.

Thank you for your time.

Best Regards,

Gavin M. Blair

Correspondence ID: 629 **Project:** 11759 **Document:** 38106
Received: Jan,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201 Fort Mason, San Francisco, CA 94123-0022.

Dear Mr. Dean,

Please allow the dog leash laws and dog-walking laws in the Golden Gate National Recreation Area to remain status quo. "Alternative A: No Action" will be the absolute best outcome for all parties involved.

Dog ownership is proven to help people's mental and emotional states. Almost equally important is the benefit to humans of walking their dogs outside, and allowing those dogs to get real exercise by running around off-leash. It does not provide enough exercise to most dogs to be walked on-leash all the time.

It is of critical importance to the health of our dogs that they be allowed to run off leash for a certain amount of time, every single day. Many San Franciscans, including myself, own condominiums which have no yards and no outside space. During the work day, we hire dog walkers to provide exercise and stimulation to our dogs, who otherwise would be home and confined in small quarters during the day.

Mr. Dean, please allow Fort Funston to remain as it is; open to dog walkers,

dog owners, sky- gliders, horseback riders, etc.

Please allow Crissy Field to remain as it is.

The idea of Muir Beach forbidding dogs to be off-leash entirely would be a tragedy for people who live nearby.

These parks are TREASURES that make living in San Francisco special.

Please do not cause every dog owner to be punished for the actions of the very few.

Please allow dog walkers to continue doing their jobs, walking up to 8 dogs at a time, on leash. The idea of banning commercial dog walking is completely devastating to me. If commercial dog walking is limited and/or banned completely, many of us will have to move out of San Francisco to an outlying area where we would be able to afford houses with fenced-in back yards.

I hope and pray that the proposed GGNRA dog management plan results in everything remaining status quo; "Alternative A: No Action."

Thank you for your consideration. Sincerely,

Laura Bauschard

Correspondence ID: 630 **Project:** 11759 **Document:** 38106

Received: Feb,15,2011 15:54:38

Correspondence Type: Web Form

Correspondence: In weighing the pros and cons of the GGNRA's proposed plan, one has to consider how the presence of dogs is any different than humans. Humans leave trash on the beach, can terrorize or harm wildlife, and can hurt other humans. Many don't, but some do. Similarly, most dogs and dog owners leave nothing but footprints on the beach. Thus, the question should not be "dogs or no dogs" but rather a question of impact.

What the GGNRA is better suited to do is keep the beaches safe by requiring all humans and dog owners to obey the rules. Should there be a violation, then action can be taken against a single individual, instead of changing the beautiful social dynamic of dogs running along the beach.

Please leave the beaches with unrestricted access to dogs and people of all ages, alike. It is one of the main reasons we love living here.

Thanks, Beth

Correspondence ID: 631 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 16:40:13
Correspondence Type: Web Form
Correspondence: Dog owners responses to this EIS shows why these changes are so needed. They feel they are entitled to land above others. They don't care about other individuals and don't care about the environment. They not only threaten individual but bribe city officials to be on their side and manipulate media for their personal gain. They don't care about being fair but rather only care about themselves and their dogs. This kind of behavior is intolerable. I believe that since the GGNRA is national park land, there should be NO dog off leash areas. Why should bay area national park land be any different than any other part of the country? Every square inch of other bay area land is treated as off leash. It would be nice to have an enforced leash refuge for people who are not comfortable with dogs. This would also maintain the beauty and environment for many generations to come.

If the GGNRA does decide to keep off leash areas, they should be muzzle requirements that are enforced. The maximum fine for breaking leash rules or muzzle rules should be \$1000 (minimum\$200). There should also be a fine for harrassment of people who do not like their off leash dogs in on leash/no dog areas. This maximum fine for breaking leash rules and harassment should be \$5,000 (minimum \$500.) Finally commercial dog walkers should be required to have a permit (\$500/month) to walk dogs in the GGNRA. They should also be required to wear identifying clothes such as a shirt with the dog walking company name or their own name if they are self-employed.

Correspondence ID: 632 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 16:53:13
Correspondence Type: Web Form
Correspondence: Our National Parks have policies about dogs for a reason. People DO NOT obey the rules that we have about a number of issues: approaching wildlife, feeding wildlife, staying on trails,etc. San Francisco is a city, I believe, that has more dogs than children. The GGNRA is used daily by professional dog walkers, some walking as many as 10 dogs at a time, often more than once a day. It is impossible to believe that these dogs are under voice control by someone other than their owners. The role of the NPS to protect our natural resources, IN THEIR NATURAL STATE, for ALL people to use and enjoy. Having to dodge dog feces left by owners who do NOT use designated areas and who fail to clean up after their pets or be harrassed by multiple dogs

"off leash" should not be an issue for visitors and regular users of the park. There should NOT be ANY "off leash" areas in ANY property under NPS control. GGNRA should not be any different than any other National Park, nor any other urban NPS facilities.

Correspondence ID: 633 **Project:** 11759 **Document:** 38106

Received: Feb,15,2011 16:57:54

Correspondence Type: Web Form

Correspondence: I strongly urge you to keep the existing off leash policy at Fort Funston. This has been a historically important haven for all the dog owners and their companions, and having the space there encourages dog owners not to let their dogs off leash in other areas throughout San Francisco. In addition, owners who use dog walking services would not have a place to go, and those businesses would suffer.

I consider myself a nature lover, and I don't advocate for dogs at the cost of other wildlife, so I do understand that there needs to be a compromise so that we can not lose areas where beautiful birds and ocean animals live. Of course we want that too. I believe that allowing the area at Fort Funston to remain as it has been since 1979 is within that compromise.

Personally I would be in favor of keeping all of Ocean Beach north of Sloat as on leash only (in other words, losing the area north of Stairwell 21), rather than lose Fort Funston.

Thank you for taking the time to read this, and consider my comment as a taxpayer and homeowner from the outer sunset district of San Francisco.

Sincerely, Kiran Malavade

Correspondence ID: 634 **Project:** 11759 **Document:** 38106

Received: Feb,15,2011 16:59:44

Correspondence Type: Web Form

Correspondence: I strongly oppose eliminating offleash access as you have proposed. One condition of your deal with San Francisco was that existing recreational uses be preserved. You tried to throttle San Franciscans ten years ago, and you are trying again now, hoping that people might have forgotten your previous perfidy.

I have written to the SF Supervisors asking them to oppose this land grab of yours as well, and I have urged them to hold public hearings on the topic of reclaiming the land from the GGNRA due to exactly such treachery as this.

Even in a good cause, it is folly to insist on having every last particle of beach cut off from one of the main user groups, and it is disingenuous folly to think that your actions will not have citywide impact.

I will continue to oppose this plan and will continue to encourage my neighbors, my friends, and my elected representatives to oppose your plan.

Correspondence ID: 635 **Project:** 11759 **Document:** 38106

Received: Feb,15,2011 17:22:19

Correspondence Type: Web Form

Correspondence: I will not bore you with an overly verbose letter. I can only specifically speak to the proposed recommendation for Fort Funston, as it is the only area I use frequently.

> I would not consider Fort Funston a multi-purpose area. It is "the dog beach". Yes it is also used by Hang Gliders and occasional toy planes and kites, but it is all about the dogs on the ground. > I walk my dog (well, she runs and plays with other dogs, but I walk) at Fort Funston weekly, sometimes twice a week. I have never seen any dog or person bitten. I have never seen anyone who is noticeably upset by the fact that there are dogs at "the dog beach". > There is *NO* alternative to Fort Funston for a dog to get adequate exercise in or around San Francisco (that I know of). Dogs cannot get adequate exercise when on lease, as they move much faster than humans. > A vast majority of the land >99% managed by GGNRA is already off limits to dogs. Why does it have to be >99.9%? > These areas have been socially designated dog runs for decades, even before the areas came under the management of the GGNRA.

Finally, I find the disconnect between the language of the document and the actual maps to be a bit odd. When I read your proposal descriptions, they sounded reasonable, but the maps shocked me. How can you justify destroying a recreational area that is being so heavily used and bringing so much joy to people and pets? How can this be the preferred option?

In short, at least for Fort Funston, I am heavily in favor of option A, and will do everything I can to pressure the city government of San Francisco to oppose these recommendations. They go way, way too far.

Correspondence ID: 636 **Project:** 11759 **Document:** 38106

Received: Feb,15,2011 18:28:11

Correspondence Type: Web Form

Correspondence: Hi All,

I hope in your consideration of the Dog Management Plan for Ranch Corral de Tierra on the Coast of San Mateo County you will consider Alternative E: "New lands begin as 36 CFR 2.15 (dogs allowed on 6 ft leash) and new lands with existing off leash use before acquisition may also be considered for voice and sight control in the future."

I am a resident of El Granada. I moved to the beautiful San Mateo coast in 1993 from Mountain View, California. One of the reasons I moved here was the outdoor recreation opportunities. Another was that this is one of the few "dog-friendly" areas in the Bay Area. Being able to enjoy hiking and walking with my dogs is a very important part of my life, and allows me some stress relief.

Soon after I moved here, I discovered the trails behind my neighborhood that I could access from Almeria and Coral Reef Avenues in El Granada. I've spent many days every week for the last 18 years hiking these trails. As a woman, I don't think I would hike every day if I couldn't have my dogs with me. They not only provide companionship and a reason to get outside, but they also offer me safety.

In 18 years I have never had a bad experience due to my dogs or other's dogs in the Rancho Corral de Tierra lands. I would say that 19 out of 20 people who I meet on the trails have a dog with them. 9 out of 10 people walk their dogs off leash. As many people are aware, dogs often behave better off leash. They do not feel as protective, and are more friendly toward other dogs and people. I've also seen very little evidence of dogs on the trails - very few piles of "poop", as the people around here are very conscientious about picking up after their dogs. I also do not see damage from dogs or the dog walkers. While I support both mountain biking and horse riding in Rancho Corral de Tierra - as I also am an avid bike rider and horsewoman, the reality is that both horses and bikes do more damage than dogs.

I've been to other areas that allow dogs in parkland, both on and off leash: The East Bay Regional Parks and parks in Carmel Valley. Again, it seems to work very well.

My suggestion would be to allow dogs on all of the Rancho Corral de Tierra trail system. If you do enforce a leash law, I would recommend it only during peak-usage, for example, on weekends from 10 AM to 4 PM in Winter, and 10 AM to 6 PM in Summer. On weekdays, allow off leash dog walking, if dogs are under voice command.

I believe the San Mateo Coast is the best place to live on the planet. It is uncrowded, we have wonderful weather, spectacular scenery, lovely people

and open space. Please allow us to continue to enjoy this with our beloved canine companions!

Lori Rhodes Morris

Correspondence ID: 637 **Project:** 11759 **Document:** 38106

Received: Feb,15,2011 20:01:17

Correspondence Type: Web Form

Correspondence: I have lived in San Francisco for 17 years and for the past 6 years have enjoyed the GGNRA off-leash dog areas with my dog. We go to Fort Funston or Crissy Field at least 2-3 times every week ? these trips are critical for the health and well being of my dog and myself.

I feel that the Preferred Alternative outlined in your proposal is overly restrictive, unbalanced and unfair.

The Preferred Alternative is not balanced. The Preferred Alternative allows dogs to be off-leash on even less land that provided for in the 1979 Pet Policy, including no off-leash anywhere on GGNRA land in San Mateo County. By denying the possibility of off-leash on any new lands that come into the GGNRA in the future, the Preferred Alternative will ensure there is no balance between recreation and protection of natural resources in the future. One-third of San Francisco households have dogs but they can currently exercise and enjoy time with these companions on less than 1% of GGNRA land.

The Preferred Alternative severely restricts recreational access for people with dogs and is a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space". Off-leash dog walking is among the recreational activities listed as traditionally occurring on the land that was to become the GGNRA. This new proposal is in direct violation of the GGNRA's original purpose.

The Preferred Alternative unfairly mandates that any new land that comes into the GGNRA cannot have dogs either on- or off-leash. This restriction goes against the recreational mandate that was a founding reason for the GGNRA. It is unfair, unneeded, and denies the traditional recreational activity of off-leash dog walking that has existed on many of these lands for decades. If new land is added to the GGNRA in the future, dogs must be allowed access both on and off-leash.

A different and more balance proposal that equally takes into consideration EVERYONE who uses the GGNRA must be created to replace this unfair

proposal.

Correspondence ID: 638 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 21:19:55
Correspondence Type: Web Form
Correspondence: I support protection of ecologically sensitive areas through leash laws. South Rodeo and Muir Beaches (and others under review) should not be banned to dogs; leash laws, even if seasonal, are effective and dogs on leash do not impact sensitive areas any more so than humans.

Additional consideration should be made to provide humans and their canines as many appropriate off-leash spaces as possible. Complaints other than environmental matters should be dealt with through other channels; dog guardians should be responsible and held accountable for having their canine companions under voice control, cleaning up after them, and obeying rules and regulations. The many should not be punished for the transgressions a few, rather, the few should be held accountable.

The bay area and its beaches are known for being magical places for humans and their animal companions. Please don't change that. Banning dogs is no way to use taxpayer's funds responsibly, nor to set an example that humans and their animal companions CAN interact with the environment in a sustainable manner. A ban is an over-simplified attempt that fails at creating a sustainable future where humans are cultivated as environmental stewards: we can coexist sustainably WITH our canine companions. Better stewardship, not bans, please.

Correspondence ID: 639 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 22:02:13
Correspondence Type: Web Form
Correspondence: I write as a Marin resident and frequent visitor to the GGNRA (generally at least once a week). I found out about the Draft Dog Management Plan (DDMP) from the Marin Humane Society, where my dog Rocky has volunteered as a therapy dog. My wife and I walk Rocky often at Rodeo Beach and the Marin Headlands trails, and we also occasionally visit Stinson Beach (on our way through to Dog Beach), Ocean Beach, and Fort Funston. I strongly oppose the DDMP's recommendations for these areas and request that the 1979 Pet Policy remain in effect.

During my many visits to these sites, I have not observed any of the problems described in the DDMP as having arisen since the 1990s -- no conflicts between visitors and dogs, no need for staff to rescue dogs or

owners, no staff cleaning up dog waste. I'm not saying these things don't happen, but I've never observed them. Before these allegations are used to help formulate a change in policy, we deserve to have some data collected and presented. Is this really a problem? My only interaction with the staff was when a ranger erroneously instructed us to put Rocky on leash while on Rodeo Beach (we complied -- not worth escalating a conflict).

Instead of presenting real data on these problems, the DDMP presents the results of a telephone survey taken primarily of people who do not visit the GGNRA. Should dogs be allowed off leash? That might sound scary in the abstract, even though the happy, prancing dogs at the beach would seem not the slightest bit intimidating in person (in canine?). Many visitors are delighted to pet Rocky and get kisses in return (he understands "go say hi" and is under voice control).

Here in Marin, the GGNRA constitutes a large part of local open space. Off-leash options are limited, much more so than in the neighboring East Bay, for example. So few of the hikes in my Hiking in Marin guidebook allow dogs off leash. How I would love to be able to take Rocky to see more of Point Reyes!

In summary, I request that you reject the DDMP's recommendations for changes to the 1979 Pet Policy, at least as far as it relates to Rodeo Beach and the Marin Headlands trails, Stinson Beach, Ocean Beach, and Fort Funston.

Correspondence ID: 640 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 00:42:32

Correspondence Type: Web Form

Correspondence: As person who was born and raised in the SF Bay Area and having lived in Fairfax for the last 28 years, I have been frustrated and upset by the ongoing plans to limit dogs and what they can and cannot do in public areas that I love and use and my tax dollars and donations support. I grew up with pets my whole life and dogs were members of my family, as they are of many people. The idea of being outside and active in the fresh air out in nature is a joy to both humans and dogs alike. As a woman, I also have felt safe with my dogs by my side whether I am at a park, open space, walking through my neighborhood or sitting on my couch. This feeling of safety is something most men do not have to consider most of the time. As far as staff and public safety goes, the vast majority of dogs are not dangerous or aggressive. You don't kick all the kids out of school because of a few bullies. And anyone who works out in nature with the park service cannot expect to be working in a controlled, completely safe environment, anyway. It is not possible.

I take my dogs off leash regularly on property off of mine that goes through 4 different "owners/stewards". And in the last couple of years, the Marin Open Space District made leashes required in one area I have had my dogs off leash for almost 3 decades! My dogs are on the trails and fireroads 99% of the time, do not harass wildlife and if they have not been ready to eliminate in my backyard before leaving on a hike, I bury any dog waste (rather than pollute with plastic bags, stopping the waste from naturally breaking down and adding to the landfills). Only people that live in the neighborhood use the area and there are not that many dogs at all but someone "on high" decided it was time to suddenly change the law. Do most people follow it? No, because it is ridiculous. I see more raccoon scats from the night before and people's used tissues/toilet paper littered around than dog waste. And these enforcement officers lie in wait and get a charge out of giving someone a completely overpriced ticket. I have been spared so far but have heard stories from others on the trails and now hike with a bit of nervousness in the background of what should be an enjoyable experience.

Bottom line is that I cannot hike or walk or run as fast as my dogs. They need to fully stretch their legs and let it all out. Nor do I feel the need like they do to stop and smell something or explore a spot for a while or play chase with each other or enjoy greeting and playing with other dogs they meet. I cannot move that fast or that way nor is my brain hardwired to operate in a way that makes certain things fun and interesting in the way it is for dogs. The joy they have in running and playing full out is something they never get to experience in their bodies or spirits when they are on a leash. Having a dog on a leash out in nature is like taking a kid to a park and putting him or her on a leash and restricting their movements and play. It is not natural for them or for dogs. I feel sorry for the dogs that live in apartments in the city and are walked on a leash 2x a day to relieve themselves...some life.

I am a huge supporter of environmental and animal rights. I do support seasonal protection in areas of nesting, for example, by limiting availability to dogs and humans. Most of the wildlife that a dog might chase or bother are creatures (prey) that have a history of that being done to them by mountain lions, bears, hawks, coyotes, wolves, bobcats, etc. that are no longer here or are few in number (thanks to us humans). It is the dog owners responsibility to stop any harassing behavior right away, of course, but it is not out of the range of many species to be harassed by some other (or several) creatures (because they are a prey species), and many are harassed less overall because their natural predators are few or gone. The bigger problem is loss of habitat by human encroachment rather than off leash dogs.

As far as people fearing dogs, that is their problem to make a choice to work

on and get over or not. But don't limit what my dogs do because someone has an issue they are not willing to address. That is like saying let's level out the hills or move the trails far from the cliff edges because a park visitor is afraid of heights. There are plenty of places to go where dogs are not allowed at all or only on leash and those places keep on being added to so if they refuse to work on their fears, go to those places. There are lots of them. As a dog owner, I know, believe me. I wish I could take my dogs (even on leash) on the Bear Valley Trail to Arch Rock in Point Reyes. I just hiked that 2 weeks ago. Everything cannot be made to appease the few on either side or either end of the spectrum. For those who have dogs, however, we are the ones that continue to have to be the ones that compromise and the areas we can have our dogs continue to dwindle. Some people do not like children running, screaming, crying, disturbing wildlife, throwing things, littering, hitting trees with sticks, trampling or picking wildflowers, etc. They spoil some people's experience of nature but do those people expect to outlaw children so their experience is more to their liking? No, they have to learn to deal with it and let it go. And what about horses? They do more damage to trails with their hooves and pollute with their waste but I don't expect them to be outlawed, either. We need to be more accommodating, tolerant and accepting of each other.

The one beach I do take my dogs is Stinson Beach. If you want to see humans and dogs off leash having the time of their lives and coexisting really well, go to the north end on the private property section of the beach and see it in action. There are people of all ages playing volleyball, jogging, napping, sunning, eating, playing in the water, looking for shells, surfing, making sand castles, etc. while dogs (and on a sunny day lots of them) run, wrestle, fetch, chase, play, dig, swim, etc. AND IT ALL WORKS!!!! Little toddlers to older folks do just fine and the dogs just love totally being free and themselves. It is a joy for me and my dogs every time I go and I just love seeing humans and dogs loving being at the beach. It can and does work. There are not user conflicts, problems with the natural processes or issues with visitor safety and it will be there for future generations. If you outlaw dogs from the Stinson Beach parking lots, picnic areas and beach area you control, you will create more problems for the private land owners and neighborhoods because it will force visitors to put more pressure on them to be able to enjoy the beach. Many more will lose than win.

Again, in the park I see more damage, disrespect to nature, the environment and wildlife, litter, unacceptable behavior, and problems for park staff due to HUMANS, not dogs. More human pressure and presence in the park with less resources to deal with the pressure causes park degradation. Focus more on these issues and stop making dogs the scapegoat. Please be reasonable and tolerant and do not take away the off leash areas or stop dogs from coming at all. Protect the sensitive species and areas from dogs AND humans as needed and the parks will do just fine. Thank you for your

balanced and fair consideration.

Correspondence ID: 641 **Project:** 11759 **Document:** 38106
Received: Jan,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mr. Frank Dean, General Superintendent, GGNRA Building 201, Fort Mason San Francisco, CA 94123-0022

Dear Mr. Dean:

Thank you for the opportunity to comment on the GGNRA Dog Management Plan and Draft EIS. I am writing to request that the plan be revised to include more areas that allow off-leash dog-walking.

I have walked my two dogs at Crissy Field beaches from the east parking lot to the snowy plover fence around sunrise each morning (average 5 days/week) for over six years. At that time of day, there are very few people on the beach not walking dogs; most people without dogs at that time are running, walking, or cycling on the path. The dogs I encounter are often off-leash, well-behaved, and with responsible owners who pick up their dogs' feces. I feel strongly that continuing to allow off-leash dog walking in the areas currently permitted, and on-leash walking (except for snowy plover and other sensitive habitat) is the most reasonable, balanced approach for management.

I understand that more people without dogs use Crissy Field and the beach, especially on warm, sunny days and weekends, and that there are some dog owners who are not as responsible in controlling their dogs as the vast majority I have experienced there. However, restricting dog activity at Crissy Field and throughout the GGNRA as severely as currently proposed is, in my opinion, not a balanced or reasonable management plan. I have not observed nor heard about a level of compromised safety or degradation of either the environment or visitor experience. In fact, the people walking their dogs in the mornings are extremely appreciative of the environment and care for it very well. As I walk my dogs, I pick up beach trash every day, as do several others, especially in winter, when an appalling amount of plastic, Styrofoam, and other trash washes up on the beach daily.

If further control of dog activity in the GGNRA is warranted related to visitor experience, I would suggest that off-leash dog walking could be limited during certain peak-human use times, for example, between 10:00 am and 4:00 pm on weekends. However, the severe restrictions currently proposed in the "Preferred Alternative" plan, again, do not seem warranted.

Thank you for your consideration.

Sincerely,

Judith Schultz

Correspondence ID: 642 **Project:** 11759 **Document:** 38106
Received: Jan,21,2011 00:00:00
Correspondence Type: Letter
Correspondence: The Superintendent, GGNRA Building 201, Fort Mason San Francisco, CA 94123

Dear Sir/Madam:

When writing my Christmas letter this year I had to search very hard for something uplifting to say in these dark times. Attached is a major paragraph of what I came up with in that letter ' something that always lifted my spirits that I wanted to pass on:

"There is a vast list of wonders in this city, but my most favorite place is the trail along the coast of SF Bay at Crissey Field (formally part of the US Army Presidio). You can just sit on a bench and watch a promenade of all sorts of people walking along this beautiful trail (that follows the Bay past the Golden Gate Bridge and winding out to the Pacific Ocean for about 8 miles). You'll see lot's of people Wind Surfing and Para Sailing out in the Bay out past Alcatraz and the Golden Gate Bridge. I've always loved Seagulls, but the pre-historic looking flocks of Pelicans that fly by are a sight to behold.

Many small children enthralled by the beach. Lot's of dog's who have been cooped up in small apartments are running with great joy along the beach, meeting up with other dogs and then dashing into the water to catch a ball. Total Happiness! While all of this is going on you'll see huge ships - sometimes a Cruise ship - coming into or leaving San Francisco Bay. When the weather is really magical - and it often is - you'll take in all of these sights as the fog rolls in like cotton candy over the Golden Gate Bridge and snakes along the bay and over Alcatraz. Truly spectacular!

I don't own a dog, but I so much enjoy watching them enjoy their nature freely and joyfully in this beautiful space. Please don't take that away from them or me.

Sincerely,

John T. Reed

Correspondence ID: 643 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean,

I am writing this letter on behalf of myself and all the other dog and animal lovers in California. My name is Barbara. I am 63 years young, middle class, and have a passion for animals + the environment.

Ft. Funston has been one of my favorite places to visit, for over 30 years. I have fond memories of all the dogs I've taken there. It distresses me to think that more of it will be closed off to people with dogs. Many of my spaces have been closed because of housing or in the case of Sharp Park pond the endangered frog. My dogs swam in that pond many times over 30 years and I'm sure the frog was there then too. Now they don't have anywhere to swim because the ocean has a riptide.

Animals are my passion, not just dogs. THE new is always filled with 2,000 shore birds killed from Costco Busan oil spill, Sea lion blinded, wolves killed from helicopters, mustangs slaughtered after BLM sells them at auction, mountain lion killed because it was near a school and animals killed by cars. The list goes on and on. Pets and wild animals have no voice. We must speak for them.

Please keep more space open for people with dogs. Tourists can go anywhere and have a good time, but pet owners (taxpayers) will get tickets if not following the law. Our areas are getting smaller and smaller. Habitat is being sold for housing and there are alot of animal protection agencies (fish + game, environmental defense fund etc.) to speak for the wild animals, but not many for pet owners. Dogs need to run not walk. They have the DNA of wolves.

The caveman domesticated the wolf because it could help him find food and for protection. We use dogs in the same way, police, service avalanche, etc. They are man's best friend and deserve a place to play.

We are all on the planet together and we need to work together for the benefit of every living thing!

Sincerely,

Barbara Asaro

P.S. Think of the world we would have if everyone had the personality of a dog___ loving, forgiving, happy and always happy to see you.

Correspondence ID: 644 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: To the G.G.N.R.A.,

To whom it may concern,

Please don't restrict the places our dogs can roam free. They just love to be with the other dogs, it makes them so happy, and I feel that when the dogs can be off leash, (at least for a while) they can learn how to be not so territorial or aggressive in some cases.

Most dogs only get "so much" fun in there lives. They are dependent on us for everything, when and where the eat, sleep, play etc. When they can be off leash for awhile, they are free! and happy. And I can say that most of the people who bring there dogs to these open areas are very, very responsible pet owners or walkers. There are very few confrontations, and everybody there is very greatful to be there.

My husband and I recently took our dog to a confined "dog park" and we found that there was so much more aggression between the dogs. May be it's because they and too confined, and feel that they area belongs to them, like doggie domain.

Thank you for reading my letter, please consider all that is at steak.

Yours truly,

Catherine Ginter, Pacifica resident

P.S. We live in Pacifica (and you know what that means) Quite frequently "after" our walk-run in "Fort Funston" (thats where we like to go) we go to San Francisco for lunch or shopping (with our dog) and that helps the city of S.F. too.

Correspondence ID: 645 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 00:00:00
Correspondence Letter

Type:

Correspondence: Superintendent Dean Golden Gate National Recreation Area Attn: ANPR,
Bldg. 201 San Francisco, CA, 94123

Dear Superintendent Dean:

I am writing to publically comment on the proposed rule for PET MANAGEMENT IN GOLDEN GATE NATIONAL RECREATION AREA. I have lived in Mill Valley, CA with my wife and two children for 19 years. When we moved to the San Francisco Bay Area in 1992, we chose Mill Valley as the place to live and raise our family specifically because of its close proximity to GGNRA, Mt. Tamalpais and Stinson Beach. During that time we have had three dogs, consecutively. As one died of natural causes, we would eventually get another; in part because dogs add a pleasant element to a family, in part because Marin County is so dog-friendly, and in large part because of easy access to GGNRC and the ability to exercise with our dogs.

For 19 years we have explored the various paths up and down Mt. Tamalpais and the surrounding area with our dogs. On some paths we have used a leash and on others, where permitted, we have not. Over time, the leash rule has encouraged us to use only paths that allow dogs off-leash. There are two distinct advantages of such a leash rule: (a) you can exercise with your dog without the owner and dog being restricted by a leash; (b) such paths generally are chosen by other pet owners who are familiar with and tolerant of dogs which minimizes unnecessary conflicts.

Similarly, when we first arrived, we visited all the local beaches (i.e., Muir, Rodeo, Ft. Baker, Stinson, etc.). However, over time we selectively chose the section of Stinson Beach where dogs were allowed off leash (i.e., the northern end). We chose this because we could relax and enjoy walks along the beach among other families who also had dogs and children, and, as such, were familiar with and tolerant of families with pets.

I believe that you need to understand and seriously consider the context in which you are proposing your new plan to severely restrict pet access to GGNRA. As I mentioned above, Marin County is very dog tolerant. I have lived in five other states, including Washington, DC and Northern Virginia, and I can say from considerable experience that there are more dogs per capita in this relatively small county than anywhere else I have lived. As a testament to this fact most retail stores, including higher end department stores, such as Nordstrom's, allow dogs in their business locations.

As a former federal official, I understand your need to balance the concerns of all citizens. I was a GS-13 in the Carter Administration and worked as an SES-I in the first Bush Administration. However, the restrictiveness of your

ANPR for PET MANAGEMENT IN GOLDEN GATE NATIONAL RECREATION AREA is not balanced and does not reflect the values of the community in which GGNRA is located. In my considered judgment, the current rules which allow dog and non-dog areas, leash and non-leash areas, are much more balanced and more closely reflect the values of the community in which GGNRA is located. I urge you to eliminate or amend your proposed rules.

Sincerely,

Nicholas J. Certo

Correspondence ID: 646 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, Superintendent GGNRA Building 201 Fort Mason, San Francisco, CA 94123

Dear Mr. Dean,

I oppose the proposed dog restrictions in Marin County. The Audubon Society does not represent the interests of most resident taxpayers and it certainly doesn't represent our country's pet owners. The GGNRA should respect taxpayers' interests before the objections of a bird group that would likely exclude people from the parks if they could.

Our society faces a never-ending onslaught of new restrictions that decrease - not increase - our quality of life. Progress isn't measured by the thickness of the rule book.

Before I moved to California 27 years ago, I saw this process occur in New Jersey. First, they outlawed dogs on the beach and then they imposed beach tag fees for visitors. My dog died, but I moved to California to get away from a seashore ruined by over-regulation.

Recreation areas belong to tax paying citizens. Let them enjoy it without further restrictions.

Charles Ballinger Mill Valley

Correspondence ID: 647 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 00:00:00
Correspondence Letter

Type:

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA94123-0022.

Dear Sir,

The proposed Dog Management Draft Plan has caused a great degree of consternation among all the many people that we have spoken to who use Crissy Field as a recreation area, whether for walking dogs or just enjoying a stroll along the beach. For all of us living in an urban environment the privilege of having an escape like Crissy Field is something to be treasured.

It seems to me that the time, money and effort that has gone into this 2,400 page report could have been spent on many more worthwhile issues. By all means, environmentally sensitive areas and endangered wildlife should be protected, but in the case of Crissy Field this has already been taken care of, and the new regulations are clearly over zealous. Limiting off leash dog walking to the small central beach area will not only be completely unsatisfactory to dog owners, but will certainly cause more environmental damage in that restricted area.

The issue is one of responsible dog management and well behaved dogs, under voice control, off leash are no more of a nuisance than 10 dogs on leash with a dog walker or for that matter a dozen or so visitors in a group cycling down the path.

The Crissy Field area was specifically designed to allow people with or without dogs to roam freely on all the non sensitive unfenced areas. I have no idea how you plan to enforce your new regulations, but common sense would dictate that only irresponsible dog behavior or any other disturbance of park visitors enjoyment should be punished.

Sincerely

Peter Blumberg

Correspondence ID: 648 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 00:00:00

Correspondence Type: Letter

Correspondence: Mr. Dean,

As a dog owner and lover of the free (America!) I want to express my concern for keeping some areas of San Francisco open to let dogs run and play. We are losing more of our rights as citizens each day and now it seems

as if it is also affecting our beloved pets. Please keep the areas dog friendly with unleashed dogs and don't put a number limit and any more restrictions.

I use a dog walker three times a week and the amount of happiness it brings me when my dog comes back is irreplaceable.

Please help keep the system from interfering with our happiness and freedom!

Sincerely,

John Fredricks

Correspondence ID: 649 **Project:** 11759 **Document:** 38106
Received: Jan,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mr. Frank Dean GGNRA Building 201, Fort Mason San Francisco, CA 94123-0022

Re. Banning Dogs from Muir Beach

Dear Mr. Dean,

Banning dogs at Muir Beach is a bad idea. (Federal plans would ban dogs, SF Chronicle, Jan 13, 2011) Who really comes up with these ill conceived and costly plans? It surely isn't someone who lives in Muir Beach. It's likely some bureaucrat sitting in an office in Washington that doesn't even know where Muir Beach is. When was the last time you visited Muir Beach? If you lived here, wouldn't you like to walk your dog on the beach?

I'm a 25 year resident of Muir Beach, a member of the Muir Beach Volunteer Fire Dept. for 22 years, and EMT. I have never responded to Muir Beach for an emergency caused by a dog. Dogs may poop, but they don't drink alcohol, break bottles, litter, carry weapons, start fires, drown or fall off cliffs. If you, as the park superintendent, really want to make Muir Beach a better place, you should ban people. Let the dogs have the beach. The people can sit in their cars and litter the parking lot.

I think that the excuse that some how dogs effect the environment or chase or scare birds is a smokescreen. In 25 years I've never seen a dog catch a bird. At most they chase away the seagulls and crows that are scavenging the trash and vomit left by humans. Is the park service going to ban horses? Equestrians never clean up after their animals. Are you planning to ban fires? Ban alcohol? Are you planning to enforce littering laws? Are you

planning to clean the disgusting port-potties once in awhile? In other words, is the park service planning to do something that really matters, or just this petty bureaucratic crap that disrupts our lives?

In addition, I have always felt much better, when my wife and children are out enjoying the beach and trails, that they have our dog with them for safety. Our dog would only lick the would-be bad guy to death, but he wouldn't know that in advance. Women and children should be allowed to have this benign level of protection and companionship wherever they go in our parks. If you have a wife or child I believe you would agree. The bad guys carry weapons, but at least we have man's best friend at our side.

Thank you for your time and consideration in regards to this upcoming decision.

Best Regards,

Robert Allen, MBVFD, Muir Beach,

Correspondence ID: 650 **Project:** 11759 **Document:** 38106
Received: Feb,04,2011 00:00:00
Correspondence Type: Letter
Correspondence: RE: GGNRA Draft Dog Management Plan

Frank Dean, General Superintendent Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123-0022

Dear Superintendent Frank Dean,

I live on the Great Highway between Kirkham and Lawton. I walk on the beach frequently. The entrances to the beach near my house are all clearly marked as Snowy Plover protection areas. The signs clearly state that dogs must be on leashes. Nevertheless, of the many, many dogs that I see on the beach, almost none are on leashes. I see them frequently chasing the birds, including the Snowy Plover. I sometimes ask owners whose dogs I see chasing the Plover if they are aware of the restriction and they always answer "yes". These owners knowingly disregard this restriction. I believe this occurs so frequently because this law is not adequately enforced.

I feel that protecting the Snowy Plover is more important than allowing dog owners to run their dogs unleashed. I hope that the GGNRA will give dog owners notice that if they continue to disregard the law, dogs will be entirely prohibited on Ocean Beach.

I also feel that fines should be increased to pay for better enforcement.

Sincerely,

Gene Thompson

Correspondence ID: 651 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 08:20:38

Correspondence Type: Web Form

Correspondence: I frequently walk and birdwatch in many parks, National, State, Regional, and

City. I have some mobility issues, but mostly fear being knocked over by large,

off-leash dogs. I usually walk with a stick for balance.

Although I understand the companionship dogs offer, I do not feel that dogs and

wildlife belong together. Besides chasing the wildlife, these domesticated wolves

must, by their scent alone, be stressful on wildlife.

Many parks require "Voice Control". This is a widely used rule, but it is unenforcable. 1) At a minimum, it should cause the dog to stop instantly any

current behavior, and if so directed (i.e. "COME"), should cause the dog to

return to its owner/handler. 2) It should control the dog's behavior, not allowing

the dog to chase wildlife, dig, or approach other visitors who do not desire such

attention.

Personally, I often ask a handler to "Please call your dog". After calling to the

animal with no effect, the response is "He/she won't bother you!" This

really is

confrontational. If I say it is bothering me, I am a Grinch, a dog-hater, somewhat

less than human. I usually repeat "Call your dog", but it doesn't get results.

Either the handler refuses, or cannot get the dog to respond.

Voice control, if enacted, will need a very clear definition, and enforcement will

be extremely difficult. Personally, I consider off-leash with voice control to be

the same as dogs running wild.

Any variation from National Park rules, i.e.

"<http://www.nps.gov/yose/planyourvisit/pets.htm>" will undermine those rules.

What is permitted in GGNRA should be permitted in all National Parks, and so

more dogs will be off-leash in Yosemite and other parks and monuments.

Service Dogs - In the last few years, mostly in Marin County, this has become a

standard response. "It is a Service Dog". I fully understand and appreciate

"Seeing Eye" dogs, any I suppose Hearing Dogs, and dogs attending a person in

a wheel-chair. But when the handler is on the phone, the dog is running free,

what is the service? I've asked, and always get the same response "I'm

uncomfortable discussing that with strangers". Who came up with that line and

distributed it to every dog owner in Marin County?

Signage - Signs stating the dog rules must be prominently displayed, and be

unambiguous. For example, in Jack London State Park (CA), the sign at the

trailhead reads "No Dogs Allowed on Trails". We saw dogs, but they were

running through the woods, not on the trails. Cezar Chavez Park (City of

Berkeley, CA) the signs say "Dogs must be on-leash in vicinity of this sign" So

how far away from sign is out of vicinity. Dimond Park (City of Oakland, CA)

has a sign "No Dogs Allowed" next to a sign "Owners must pick up after their

dogs". Which sign is correct? Do professional dog-walkers have to pick up the

dog litter?

Enforcement - Most dog owners know that even if caught violating the rules, they

will only get a verbal warning. In most parks, gardeners, maintenance workers,

naturalists, etc. will not speak to dog owners violating the park rules. These

employees often like dogs, and approach the dogs to pet them. This gives tacit

approval to the violations. I understand the reasoning behind not having these

people enforcing the rules, but to not speak to the owners does give approval.

Whatever rules you choose, the ability to enforce them must be

considered.

Therefore, these rules must be clear and concise. If you are going to allow

"Voice Control", then a handler must demonstrate, if called to do so, that his/her

pet will respond correctly even when distractions occur. A dog off-leash has to

return to its owner regardless of distractions. Instantly, not after it has greeted

me.

Correspondence ID: 652 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area, Building 201 Fort Mason, San Francisco, CA 94123-0022

Dear Mr. Dean,

I'm writing in strong support of the Golden Gate National Recreational Area's need to curtail the impact of dogs on our valuable shared recreational resources (Alternative D).

It's true that dog owners are a very vocal, very organized group, unlike most pedestrians, families, and other users of parklands. I believe that is part of the problem.

Once an area becomes conventionally used as an off-leash dog area, people with children, people with physical frailties, and people who wish quieter, more contemplative settings avoid the area entirely. This certainly reduces the conflict between different kinds of users, but only because people with vulnerable children or who are vulnerable themselves to getting knocked over by racing, fighting dogs no longer have access to the park in question. There can appear to be fewer conflicts because vulnerable people have to quit coming.

I worked for years as a senior advocate, and watched as beach after beach, park after park became unusable to seniors because of the sheer volume of unleashed dogs. One of my clients suffered a hip fracture when tripped by a

dog running by with an attached leash, and spent her next six months in painful rehabilitation therapy. Her inability to move and live independently was costly physically, financially, and emotionally. She died within a year and a half of the accident.

In addition, the Bay Area is lucky to have an exceptional minority of people who deeply appreciate migratory birdlife and rare plant species, and I count myself among that group. Affected wildlife can't participate in fora or write letters, but need space to rest and thrive as certainly as the rest of us.

Our beaches and parklands are greatly diminished as wildlife is forced to retreat further from natural areas. Our lives are diminished by our inability to see the full measure of our natural world.

Please adopt the most protective option for our vulnerable parks, people, and wildlife. Responsible dog owners will celebrate this effort along with the rest of us.

Thank you,

Carol Denney (volunteer with the state and national parks)

Correspondence ID: 653 **Project:** 11759 **Document:** 38106
Received: Jan,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Superintendent Frank Dean, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123-0022

Hello, I am in favor of the preferred alternative in the proposed dog management plan especially were it prohibits dogs on or off-leash at East Beach at Crissy Field.

The problem is out of control with Dogs chasing wildlife, poop everywhere, digging wholes, peeing on personal property, biting and knocking people over.

Also I am disappointed with that lack of enforcement of the current rules; specifically keeping Dogs out of the out door shower and bathroom at Crissy field.

Sincerely

Jeffrey Finn

Correspondence ID: 654 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 00:00:00

Correspondence Type: Letter

Correspondence: Superintendent Frank Dean, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123-0022

I support the management plan for canines on Golden Gate National Recreation Area land - a proposal that would require dogs to be leashed in many areas where they once ran free and would ban them entirely from other areas.

As a 35 year San Francisco resident I've seen our city overrun by the canine obsession. Back before the Bush Administration destroyed our economy through wars of adventure, folks use to think about buying homes and settling down or spending their capital on glorious vacations. Now that no one has any disposable income, everyone's getting a dog to placate their loss of the American Dream. I see dogs off leash in commercial corridors, on MUNI, in coffee bars, in restaurants, etc. I see dog feces on every block of our city. I'm a taxpayer, property owner, registered voter, and I'm fighting back. These animals must be reigned in!

Howard Fallon

Correspondence ID: 655 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 00:00:00

Correspondence Type: Letter

Correspondence: Mr. Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean:

I wholeheartily approve of the Plan proposed by the National Park Service on the Management of Dogs on Federal lands in San Francisco and the Bay Area.

A few years ago I was bitten by an off-leash dog in an unprovoked attack on Ocean Beach in San Francisco. I have given up walking on Ocean Beach, Funston Park and Crissy Field because of the danger of free running off-leash dogs.

There is no city in Europe which allows off-leash dogs. Cities also require

clean up by owners of dog feces in streets and parks.

Walkers are not organized like dog owners but we are a significant user of streets and parks. Stick by the rules and regulations of the National Park Service which are there for good reason.

Sincerely,

Nancy Elsner

Correspondence ID: 656 **Project:** 11759 **Document:** 38106
Received: Jan,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean General Superintendent of the Golden. Gate National Recreation. Area Building 201 Fort Mason, San Francisco CA 94123-002

Dear Superintendent Dean,

I would like to take this opportunity to completely support limiting off-leash dogs within the GGNRA. In fact if it were up to me there would be no dogs allowed inside the GGNRA even on a leash.

Due to years of organized groups of dog owners who have politically bullied the public and political leaders alike into believing that off-leash dog use is a legitimate form of recreation there is no where to go for a peaceful walk in any park. They have silenced anyone who dares object by using intimidating tactics. Anyone who complained that our rights to a respite from the daily living of an urban setting was conflicting with their desires to use every square inch of any place they want as dog toilets and exercise areas as their god given right is labeled a "dog hater".

You do not have to be a "dog hater" to realize that not everywhere is appropriate for off- leash dogs. Dogs often cause erosion, and upset the balance of nature and conflict with how others which to use a common space. It is often not compatible to have dogs running loose when it bothers others who want to use the same area.

Dog owners are the first to complain if bicycle riders or horseback riders want to use the trails.

Those of us who wish to use the GGNRA without having to put up with the conflicting use of limited space, unsafe running by their dogs, noisy barking and lack of respect by dog owners for the natural environment we want our

rights upheld to enjoy the GGNRA.

Use of this property should not be dominated by off-leash dogs, and their needs, as is currently the case. This public space belongs to all of us and it is about time that the rest of us got to use what our taxes have paid for without being made uncomfortable or kept out entirely by a single user group.

Sincerely, Miriam Moss

Correspondence ID: 657 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 08:59:01

Correspondence Type: Web Form

Type:

Correspondence: I, and everyone I know, loudly and enthusiastically applaud any decision to better regulate dogs and dog owners in these areas. But Baker Beach should ALSO be included in this regulation. Dogs there are out of control.

Dogs are out of control in the parks. Throw down a blanket or a towel and within minutes an unleashed dog is running over it and trying to eat your food. I was at Baker Beach last weekend (down the street from my house) and I literally stepped on dog poo TWICE! This is unacceptable. Dogs should be on leashes. Do let them roam free causes waste and poses a potential danger to others.

Dog advocates have historically contended that dog owners are "responsible and pick up after their dogs and keep their dogs in check from annoying others". This is patently not true. Any reasonable person who sits for even a short amount of time at Crissy Field, Baker Beach, Ocean Beach, et al will quickly see that some dog owners do not pick up after their dogs at all or keep them off of other park visitors. The reality is that even a small percentage of owners who exhibit this behavior ruins it for everyone.

Dog owners are organized, but their loud opposition to this does not mean that they are in the majority. Most City residents favor more regulation and better enforcement for dog owners.

Correspondence ID: 658 **Project:** 11759 **Document:** 38106

Received: Jan,20,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Frank Dean General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco CA 94123-0022

RE: Dog Management Plan/DEIS

Dear Mr. Dean,

We appreciate being given the opportunity to comment on the GGNRA Dog Management Plan and DEIS.

We have long believed that unconstrained dog access to the GGNRA is inappropriate for the mission of protecting and encouraging native flora and fauna, and often very unpleasant for other recreational users of the GGNRA. Many dog owners suffer from the delusion that their pets, regardless of their behavior, are always lovable and that their attentions are welcome. Wrong. Most owners further believe that anyone trying to fend off their pets will be placated if assured that "he won't bite" or "she's just friendly." Though being marked with muddy paw prints from a non-biting dog is better than being muddied and bitten, it is still not an experience one goes to the GGNRA to enjoy.

Your January 2011 Newsletter makes reference to "on-leash and/or voice-control," perpetuating one of the most cherished illusions of many dog owners. That is the belief that voice-control actually works. There are some rare, highly trained dogs (guide dogs for the blind, K-9 Corps animals, possibly bomb sniffers) that do respond consistently to voice commands. However, the lovable family pet tearing around the GGNRA is virtually always utterly oblivious to voice commands, most of all when having fun jumping on unenthusiastic strangers or chasing wildlife. We urge that you require all dogs in areas where they are not explicitly allowed to be off-leash, to be always on-leash. If some dog owners are insistent that their animals can be fully controlled by voice commands, they should be required to demonstrate this by testing, under realistic conditions. (The owners of dogs should bear the full cost of the tests, and dogs that pass should be required to carry some form of identification, renewable annually for a fee.) The going-in assumption should be that voice-control does not work unless contrary proof is provided.

We could find no mention of requiring dog owners to pick up their pets' feces. Dog owners may enjoy the squish of dog droppings underfoot, and its rich aroma, but most other people don't. Why should anyone be forced to put up with dogs fouling the GGNRA?

Finally, we would like to say how much we welcome your statements to the effect that dog policies shall be enforced. That will involve both effort and expense, but without consistent, active enforcement, no dog policies are worth discussing. The Marin Municipal Water District (MMWD) has fairly strict dog restraint policies (to protect public health and water quality, non-

controversial goals) but they are weakly enforced. As a result, most dog owners appear to consider these policies to be optional, not mandatory, and elect not to follow them. When MMWD rangers do catch off-leash dogs, they nearly always offer earnest, sensible advice to the offending owner. This amounts to voice-control for owners, and is, predictably, ineffective. If GGNRA is going to have dog policies, they must be enforced, which will require adequate staff and a willingness to levy fines, high enough to get the owners' attention. This will certainly create an uproar. Are you ready to face that?

Controlling dogs ranks only second to controlling firearms in the outrage it provokes. We are very lucky that the Founding Fathers did not mention dogs in the Constitution.) Just raising the highly appropriate and timely issues you are addressing is courageous. We admire you and hope that your efforts will be successful.

Sincerely,

Sandra Guldman, Thomas Guldman

Correspondence ID: 659 **Project:** 11759 **Document:** 38106
Received: Jan,21,2011 00:00:00
Correspondence Type: Letter
Correspondence: General Superintendent Frank Dean Golden Gate National Recreation Area Building 201 Fort Mason San Francisco CA 94123-0022

Dear Superintendent Dean:

I am writing regarding my concern about dogs in our national park.

I am a Golden Gate National Park supporter, user and lover. I swim at Aquatic Park in San Francisco? I walk, run and bird at Crissy Field several times per week, and I volunteer at Ocean beach once a month. During daylight savings time I like to head over to the Marin Headlands after work.

I am a charter Golden Gate Keeper, my donation is small, but it is monthly and will keep coming as long as I am living.

I like dogs, but feel that dogs should not have free run of our park.

Recently an unleashed hunting type dog named Dexter was in the lagoon at Crissy harassing birds. The owner was trying unsuccessfully to call the dog out, but the dog had a target and was going for it. Most dog owners are

responsible, but there are just too many dogs at Crissy Field.

I have had this experience at Aquatic Park, which is signed "No Pets on Beach". I witnessed a dog killing a western gull last summer. The dog's owner was upset about this, but there was just nothing that he could do to stop the dog.

Dogs run out of control at Ocean Beach and Rodeo Beach, and are often in the lagoon at Rodeo, which is signed "no dogs". Dogs are unleashed and not under voice control on the Miwok/Bobcat trail in the Marin Headlands. I recently, for the first time, saw a dog on Tennessee Valley Trail.

Our parks are not for dog recreation. We should all respect the beautiful place we have.

Dogs need to run, but it should not be in our national park. They need designated dog parks, away from wildlife and from humans that do not want to interact with dogs at play.

Please keep our park for the native plants and animals. I am worried that dog owners have already taken so much with their disregard of signed areas, and that if given more, there will be no place that is dog free.

Thank you.

Sincerely,

Mary Cantini

Correspondence ID: 660 **Project:** 11759 **Document:** 38106
Received: Jan,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

Greetings.

Thank you for the opportunity to express my comments on the proposed dogplan.

I live half a dozen blocks from Ocean Beach in San Francisco, near Rivera Street. enjoy going to the beach for leisure and recreation.

Generally speaking, some dogowners are very considerate of others. However, many allow their animals to run rampant, both on the beach and

on the sidewalks, ignoring posted signage, and frightening children, birds, and some adults. Many of the dogowners are scofflaws, just like many bicyclists ignore traffic laws in the city.

The careless owners also ignore the requirements to pick up excrement from their pets. These animals are hazardous to humans and deleterious to the environment, which is very fragile at best. Consider, for example, the recent erosion of Ocean Beach over the past few years, destroying portions of The Great Highway. Also, there are rare species of birds in the area, like the snowy plover and others.

I support a ban on dogwalking, off-leash, on fragile portions of the beaches in San Francisco, particularly Ocean Beach, plus Crissy Field, Fort Funston, and other locations, and an outright ban of dogs on the particularly vulnerable areas. The owners often complain their animals need to get exercise off leash. I say let them do so in their private yards, not in public space. Also, there are portions of Golden Gate Park where the dogs can be walked.

Sincerely,

Russell K. Carpenter, Ed.D.

Correspondence ID: 661 **Project:** 11759 **Document:** 38106
Received: Jan,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, Supt. GGNRA Bldg. 201 Ft. Mason, SF 94123

Dear Sir:

I live in Pacifica and am sick and tired of dogs having more "rights" than people.

There need to be more places where dogs are not allowed off leash in Pacifica!! This idea of making hiking trails dog friendly is not a good idea!

I have been out walking in Pacifica, in various places and have had strangers' dogs come up and sniff me -- even when I've sat on the benches on the cliffs (by Nick's) that overlook the ocean trying to get in a peaceful mood only to find these annoying offleash strangers' dogs pestering me! Keep the dogs and dog parks away from where people walk. And insist that all dogs everywhere be on leash!

Save money. Avoid lawsuits. Keep dogs on leash! Keep dogs off Mori Point

and other pretty hiking areas (unless on leash).

Sincerely

Correspondence ID: 662 **Project:** 11759 **Document:** 38106
Received: Jan,20,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean General Superintendent Bldg 20 Fort Mason SF CA 94123

Re: not enforcemnt of present leash law at Sutro Park Proposed new law for Sutro Park

Dear Park Planning/dog planning,

I live across the street from Sutro Park at the above addresss and have watched the dog owners overrun + ruin the foliage and ability of older people/children/adults to enjoy the park. I have called numerous times to ask the law be enforced to keep the dogs on a lease with minimal help. The signs are deformed or broken and the dog owners feel it is their park. My elderly mother was afraid to walk in the park as are many other older people for fear of the dogs that are running wild. I have seen the dogs run in front of children and bike riders with resultant injury.

The park is for all to enjoy not just the dog owners. I also see dog walkers coming and emptying out their vans with many dogs and letting them run wild. The park is small and beautiful and should not be a dog park because much of it already has turned into shit due to the dogs, constant clawing, defecating/urinating and digging. There shouldn't be explicit dog parks for this.

Thank you, Elaine Gedt MD

Correspondence ID: 663 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 10:06:07
Correspondence Type: Web Form
Correspondence: I am dog owner living along the Great Hwy.

1. I would like the Great Hwy dunes area open for off leash walking. The May-July off leash allowance seems unnecessary (what are the statistics of the snowy plover recovery??- I have never seen one) . What I do wonder is why the Ocean Beach area by the Cliff House is an off leash area. That is the area where people park and enjoy the beach. The area between Lincoln

& Sloat is not as populated with people w/o dogs. Why not make that area off leash? That way the open beach can be used by folks w/o dogs.

2. I would like Fort Funston to remain open to off leash dog walking. I go there 1-3 times a month and have never seen an incident where the dogs/people did not get along.

3. If you don't provide areas for dogs and their owners to enjoy - I believe you will have more complaints from citizens who will be walking their dogs on the streets. If you know dogs - they are much more friendly off leash when they approach other dogs.

4. I believe responsible dog owners are aware if their dogs are voice controlled - they leash them when necessary. If you allow voice control along the Great Hwy, that would be a good thing.

Correspondence ID: 664 **Project:** 11759 **Document:** 38106

Received: Jan,18,2011 00:00:00

Correspondence Type: Letter

Correspondence: Hi Mr. Dean,

Many thanks for taking another look at changing the dog policy at the G. Gate NRA site.

As a native of SF, I love dogs but feel the G.G. NRA parks are not "people friendly".

I support your "Preferred Alterantive" for the 21 areas, but would add to have dogs on-leash at all 21 areas at all times. Many people come from cultures in which dogs are not pets and can be frightened by dogs.

Thank You,

Ken Lee

Correspondence ID: 665 **Project:** 11759 **Document:** 38106

Received: Jan,26,2011 00:00:00

Correspondence Type: Letter

Correspondence: Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Dog Management Plan

For years we have hiked the Bay Area parklands. Our keen appreciation and sense of responsibility makes it effortless to adhere to codes and regulations at each particular park. Presently we do not bring our small dog "Jimmy" to many areas in the GGNRA where dogs are allowed off leash simply because we detest seeing the 'ANYTHING GOES' mentality where too many dog owners allow their pets to have their way abusing, misusing, and damaging terrain, flora and fauna. Then too we resent the lack of enforcement by park officials. The accumulated effect of misuse and neglect are painfully apparent to all who care about the planet.

What about those of us who come to visit the GGNRA seeking only to enjoy an experience of being in harmony with the non-manmade world? Having acquired the quality of engaging nature on its own terms, we are open to peace and serenity beyond expression. Being emotionally one with our surroundings, we naturally treat it with utmost care and respect. Seeing misuse and neglect, and the prevailing sense of disorder is an intensely aching experience, which is why we wholeheartedly support the Dog Management Plan as well as unblemished enforcement. An intelligent approach to park management is to prohibit unlicensed dogs and unconditionally cite those violating park regulations. Let violators pay the citation or appear before a judge to explain why they have rights that exceed the rights of other living things.

This is our individual problem; it is not some speculative problem that doesn't concern each park visitor. If as human beings we do not know how to care for the earth, which includes our urban environment, if we are merely concerned with ourselves, we shall further desecrate our planet; for what is done or left undone in the short run determines the long run. Will we continue to sanction misuse merely because we have 'good' excuses? How degraded are we willing to allow things to become before action is taken to reverse the trend and restore sound practices? The easy excuse is a lack of money or resources when in fact it is a lack of responsibility and determination that is critically important. How long will we remain inept? What legitimacy do Park officials have when they sustain misuse through neglect? Sound policies, maintenance and enforcement are needed now!

Correspondence ID: 666 **Project:** 11759 **Document:** 38106
Received: Feb,02,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent, Golden Gate National Recreation Area, Building 201, Fort Mason, San Francisco, CA 94123-0022.

RE: Dog Owner wanting More Restrictions for ESA T/E species.

Dear Mr. Dean;

I am commenting on a very difficult issue. I am a frequent dog-owner, user of Muir Beach, Stinson and Rodeo where I walk my dog on the legal trails for dogs. One of the reasons I go to the beach is to clean it. I have cleaned Muir, Stinson, Pirates Cove and Rodeo hundreds of times. A salmon ecologist and restoration expert, I have the utmost concern for cleaning up dog excrement and keeping my dog out of the creeks isolated to the shoreline and minimally impacting wildlife.

This is my behavior, because I am educated about the environment, species and habitat concerns, and cultural concerns. However, when I come to the beaches and walk on the trails, many of the rules are not observed by others. Dogs are off leash where they shouldn't be. They are in the Big Lagoon often, Redwood Creek and the riparian zone where they can impact salmonid and frog species recovery. Dogs run after shorebirds, which are disappearing at an alarming rate. Though I have observed all regulations, cleaned up after my dog, (he doesn't chase anything) and kept him leashed in restricted areas, I cannot condone the further permitting of dogs on Muir Beach. It has gotten too impacting. However if dogs continue to be allowed at these beaches, the responsibility lies on Park Service to provide better education and clarity about where and why dogs are restricted. With budget constraints, this is a difficult outreach and requires hyper-vigilance. Many times, I have talked to folks who have allowed their dogs into these restricted areas ,to explain the reasons. Sometimes met with anger, sometimes with shock about their own ignorance..... most people want to do the right thing. In this exact same vein, people without dogs have done damage to the sealed mouth of Big Lagoon, breaching it in summer and invading the sensitive dunes. Having lost our intrinsic ability to respect natural systems, it falls on the parks to propagate stewardship whether there are dogs there or not.

The human caused damage is just as significant. I know, I have cleaned enormous quantities of trash from the beaches, oiled debris from Cosco Busan, witnessed kids slathered with sunscreen playing in the lagoons, found birds strangled by fishing line, probably the very birds I worked to save at the International Bird Rescue and Research Center. I have found sea lions and seals with bullet holes, hundreds of carcasses of pelagic and shorebirds, watched people leave piles of garbage and food behind impacting wildlife and other beachgoers and the cf burning toxic materials, such as plastics, to create bon fires on the beach. Leave no trace use is a joke. I would just as quickly ban people as dogs.

Do what you need to do to save the birds, amphibians, marine mammals and sahnionids. You have my support as a friend of many NPS Park employees and great --- respect for what tasks you have. Me and my dog will just have to go somewhere else. Having a top predator as a pet is what it is. We are out of balance and need a return to such. However, it saddens me to think that those among us who respect the rules must pay for those that have not. This is a failure of education and a lack of respect for nature. For the wild animals struggling to survive in our world I would give it up.

Sincerely,

Laura Chariton

P.S. If dogs are banned I probably won't be cleaning beaches as much

Correspondence ID: 667 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 10:47:21
Correspondence Type: Web Form
Correspondence: My only comment is that the GGNRA dog policy should conform to the dog policy in the other national parks(dogs restricted to a small area and on a leash). I long ago quit visiting Fort Funston due to the excessive amount of dogs running loose there. I also do not visit Ocean Beach for the same reason. In turn, I stopped my financial support of the GGNPA years ago as the GGNRA,in San Francisco, has turned in to one big "dog park." As a taxpayer, I feel I should have the right to go to the park(that I help pay for) and not be bothered by dogs that chase birds and cause environmental damage.

Correspondence ID: 668 **Project:** 11759 **Document:** 38106
Received: Jan,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, Superintendent GGNRA Bldg. 201 Ft. Mason, SF, CA 94123

Dear Superintendent Dean;

I strongly feel that the GGNRA 2400-page report on dog effects upon our recreation areas and their recommendations for future use is a waste of taxpayer funds toward an unprogressive goal: eliminating or limiting dog-friendly spaces for respectful, appreciative, dog-owning citizens. Shame on. GGNRA for using taxes for such a purpose! Take a long, hard look at the joy these open GGNRA spaces currently provide to residents. Some of my friends, young and old, recently remarked that their off-leash time with their

dog(s) was the most anticipated, pleasurable time they had all day.

Recall, that many areas in the hands of GGNRA were pioneered by dog owners who were not so picky about where they exercised themselves and their pets. Many GGNRA-held lands once privately owned, were also neglected. Fort Funston for instance, was filled with dark, military bunkers where homeless and party seekers spent their early mornings. Dog walkers exercised and thrived with these colorful, strange people without complaint. It is wonderful, open spaces like, Fort Funston and Mori. Point (once an old farm with dilapidated buildings, rotten tires and motorcycle trail wounds) where so many citizens of San Mateo and SF have exercised their adopted pets for decades. Heads-up GGNRA, the people your recreation areas serve live in the BAY AREA. Most of us don't have the time or money to have kids and if we did, we still live in cramped apartments or small, urban dwellings with a pet. We need open space to thrive! Thanks for accepting the guardian stance, many private landowners granted you, while offering lands for local recreation.

Sights you will see at GGNRA grounds: 1. Thousands of happy, socialized urban dwellers, including, people and pets 2. Expansive, untended lands put to beautiful use by regular visitors and residents 3. TONS of iceplant 4. No Garbage; frequent organized clean-up sessions 5. Remains of bunkers, missile sites with noticeable cement bags, blocks and unnatural military deposits. 6. Flimsy, dirty portable latrines serving thousands of visitors every week 7. Unnaturally high numbers of Ravens and Crows eating from "easy" garbage cans (a persistent threat to the Bank Swallow Colony) 8. Swallows flying for bugs in spring and summer 9. Great horned owls in the Cypress Grove 10. Centipedes searching for prey across the sand 11. Hanggliders, surfers and "flyers" enjoying the space with their area enthusiasts Maybe the thousands of visitors should be asking what kindness have you offered users of your precious GGNRA land lately? Have you tried to decrease the number of predators (crows and ravens) of the swallow broods?

Sights you will not likely see at GGNRA grounds: 1. Dogs fighting (unless leashed and hostile to free roaming dogs) 2. Regular wild life (not a single snowy plover) 3. Clean, comfortable bathrooms 4. Rangers

You couldn't dream up such a splendid use of urban/suburban space. These activities are worthy of a National Geographic article, describing how fabulous lands contribute to healthy lives of Bay Area residents.

Exploiters of GGNRA are/have been predominately, dog owners. Please respect our desire to have open spaces for our pet's and our own well-being. Historically, from Mori Point to Rodeo Beach, we accepted inhospitality, in exchange for dog and human peace. 20 years later, you should rejoice in our creative sense to make these places serene. Dog walkers are the ONLY

citizens I witness cleaning the beaches. We also provide a constant, educated eye on wildlife and important events, while walking our pets off leash. (Ask the Marine Mammal Society who their "typical" caller of distressed wildlife might be).

Please take the time to respectfully consider the People of Marin, SF and San Mateo who own dogs and need open, off-leash space to exercise themselves and their pets. These lands are our only refuge from the urbanization around us. We desperately need to escape (as much as our dogs), from stress.

Respectfully, Leah Conroy BS, CST Surgical Technologist (Stanford Medical) Former Research Scientist (Novartis) Pacifica resident for 20 years CA resident for 28 years

Correspondence ID: 669 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 11:22:37
Correspondence Type: Web Form
Correspondence: I visited Crissy Field with my son once when he was a toddler, 15 years ago, and we were both terrified of the packs of off leash dogs jumping on us. We never went back again, just as we never went back to Ocean Beach for the same reason. My son might as well have grown up in Kansas for all that he got to enjoy the ocean here in San Francisco.

I am really glad that GGNRA is finally taking steps to balance the needs of the environment and people who are not dog fanatics with those of the dog owners' whose sense of entitlement knows no bounds. It is too late for my son to have memories of playing at the beach as a child, but maybe other children will be able to go to the beach without fear.

I hope that you will choose the alternative that best preserves the environment and the rights of people who have had enough dogs, thank you.

Whichever alternative is most restrictive for dogs is the one that I favor.

Correspondence ID: 670 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 11:49:40
Correspondence Type: Web Form
Correspondence: Restricting off-leash areas in public parks such as Crissy Field is necessary for a number of reasons: environmental, safety (especially to children) and public health. While the majority of dog owners are reasonable and pick up after their dogs, many don't care or simply can't control their own pets. Our

children play in these parks. Why should they have to endure the potential dog-bite or frequent dog-doo? I am a dog owner. I leash my dog in the street, as I know that many people are afraid of dogs. Should we really restrict the use and enjoyment of public parks by taxpaying individuals for the sake of dogs? Dogwalkers should be required to get a license: it allows for greater control and also will generate revenue for the City. Thanks.

Correspondence ID: 671 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 12:06:29

Correspondence Type: Web Form

Correspondence: In the Dog Management Plan for Fort Funston, I support Preferred Alternative C, with a physical barrier to limit dog wandering.

I have been flying hang gliders for 10 years, 7 of them at Fort Funston. I have served on the board of the club as President, Vice-President and Technology Officer.

Hang gliding at Fort Funston is a huge draw for both pilots and visitors. We have hosted fliers from all over the world, all of whom have been drawn here by its pristine beauty, its view of the ocean wildlife from above, its proximity to San Francisco, its historic role in the evolution of hang gliding, and other reasons. Thousands of people each year are drawn to enjoy this treasure because they can watch a sport that lives in legend but is difficult for the average person to see in action.

When dogs attack pilots on launch or landing, it threatens the site for everyone. Pilots don't want to come, and visitors don't want to go anywhere near the attack zone. I don't exaggerate here - landings, already the most dangerous part of aviation, become life threatening when there's a hostile distraction going for your leg on the final approach. It's not fun.

Alternative C is a good compromise that allows flying to continue while co-existing peacefully. I would ask that you separate the off-leash dog walking from the other areas and that you erect a barrier to keep the dogs from wandering into areas where they shouldn't be.

Best regards,

Daniel Pifko

Correspondence ID: 672 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 12:12:33

Correspondence Type: Web Form

Type:

Correspondence: I am in favor of a plan that balances the needs of all users of GGNRA, both dog-walkers and non-dog-walkers. I like to walk my dog on leash in GGNRA sites, especially Land's End and Fort Funston, and I would like the opportunity to allow him to go off leash. But I also recognize the need to restrict dog-walking from some area of the parks, in order to preserve the parks for everyone. The devil is in the details. Here's a sentence that needs further clarification: "on-leash and/or voice-control dog walking in certain, specific areas of the park where impacts to sensitive resources and visitor experience were minimal, ? no dogs in areas of the park where impacts were unacceptable and could not be mitigated,"

We need to see a map of the specific areas in question. Also, since enforcement is likely to be a major issue, we need to know that there will be fences or other structures that clearly indicate where off-leash is permitted, and where it is not permitted.

Correspondence ID: 673 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 12:13:16

Correspondence Type: Web Form

Correspondence: I am writing to voice my desire that no changes be made in the "Leash Laws" that are current and already too restrictive in the GGNRA. We've had dogs in our home since 1970. We've spent thousands of dollars making purchases for them. Our taxes on those purchases contribute to the GGNRA. Dog walkers currently have enough restrictions. Adding more restrictions will cause many dog walkers to abandon San Francisco. These dog walkers also pay taxes and spend money in San Francisco.

Finally, restricting dog walkers to leash laws will force them to abandon the GGNRA and use more dog-friendly areas in San Francisco. This will place an unfair burden on the City Parks and Recreation Department. Thank you, R.J. Ovanin

Correspondence ID: 674 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 13:04:26

Correspondence Type: Web Form

Correspondence: Re: GGNRA Draft Dog Management Plan / EIS

Thanks for the opportunity to review the draft document. Appreciate the time & consideration you've put into it. After reviewing the options/alternatives presented, I would strongly support alternate B - maintaining an "on-leash only policy consistent with the rest of the National

Park System.

Its the simplest and most direct way to balance all the differing voices. Big dogs annoy my wife and other small dogs when running free. All dogs pose some form of threat to indiginous wild life & plants - whether large or small. The best way to contain the potential for damage / unintended consequences and still allow access for dogs is to require all to be "on-leash." There's no reason whatsoever to acknowledge or create a special category for San Francisco; just stay with the system-wide standard. It will save confusion in the long run.

Correspondence ID: 675 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 13:11:25

Correspondence Type: Web Form

Correspondence: I write in favor of your proposals regarding dogs in the national park. Unleashed dog areas in any public park are rendered pretty much unuseable for any other park visitors. The damage to the vegetation and animal waste from dogs ruin the park for the vast majority of park users. I simply want to voice my strong approval of your proposals and believe that my views represent the "silent majority" of park visitors.

I live a few blocks from Ocean Beach and visit the recreation area several times each week.

Thanks for your consideration.

Steve Connacher

Correspondence ID: 676 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 13:34:41

Correspondence Type: Web Form

Correspondence: I am a staunch environmentalist who believes in protecting pristine wilderness. I am also a dog lover and owner. I am writing to ask that you increase or, at the very least, leave as is the areas in which dogs are allowed in the GGNRA. Specifically, Ft. Funston, which is not remotely pristine wilderness, must be kept as an off-leash dog area. Dogs *need* to run and to socialize off-leash; these are some of their most basic instinctive behaviors. For the same reasons, Muir Beach and Ocean Beach should also remain dog-friendly.

People who don't enjoy off-leash dogs have 99% of the GGNRA to enjoy

without worrying about dogs.

I would also like to suggest that the PAVED road to Tennessee Valley Beach allow leashed dogs. Clearly, there is no ecological issue.

Furthermore, there is not a single loop trail in the Headlands area that allows dogs, despite one loop that I have hiked made up almost entirely of fire roads. The logical solution is to create non-pristine areas where dogs are allowed, so that pristine nature is protected and those who don't like dogs can easily avoid them.

Dog owners will happily abide by the rules if the rules are clear and reasonable. Barring dogs from a long-standing dog park and from paved roads is NOT reasonable or necessary.

Roughly 1 in 8 San Franciscans owns a dog. Dogs-lovers are not a small special-interest group. And dogs themselves help humans in countless ways every day, from providing services to connecting us with the natural world. The GGNRA cannot continue to pretend that dogs are merely nuisance that will go away if not allowed on its lands. Some dog owners and walkers will crowd into city parks, as the Chronicle reports, where those who don't like dogs can't avoid them. Others will throw up their hands and take their dogs with them on hikes into fragile wild lands.

The solution is a clear one: Don't shut dog owners out when you make your rules. Find places where we can go and we will happily adhere.

Correspondence ID: 677 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 14:58:10

Correspondence Type: Web Form

Correspondence: I am opposed to the proposal to make drastic changes to off-leash dog-walking in the 1% of GGNRA land that is currently used by dog walkers, both individual and commercial. Specifically I refer to the following areas: Ocean Beach, Fort Funston, Crissy Field, Baker Beach, Lands End, Fort Mason, and Fort Miley in San Francisco; and Rodeo Beach, Muir Beach, and various trails in Marin.

These areas are not wilderness, nor should they be. They are open lands that should be available to be enjoyed by the public, including people who want their dogs to have a place to run and play. There is plenty of pristine landscape up and down the coast that should remain intact, but disallowing off-leash dog walking in the above-mentioned areas will only create overcrowding and overuse in the few off-leash parks that would remain. Alternatively, dog walkers would be forced to look for other areas, which

are currently pristine and undeveloped. Dogs are not going away, and people will find a place to let their dogs play freely.

Furthermore, I am a tax-paying citizen without children, but I do own a dog and responsibly walk him off-leash in appropriate areas. There is very little that I see as a direct benefit of my tax dollars since I don't have children who attend public school. Having an off-leash place to enjoy nature with my dog is one of the few things I enjoy as a result of my tax dollars. I will be very unhappy if this is taken away from me and my fellow dog owners.

Recently, many public decisions have gone against responsible dog owners, not the least of which is a severe curtailment of usage of Sunnyside Park in San Francisco. This park was converted to almost exclusive use as a playground, in spite of there being a large group of devoted and responsible dog owners who developed a wonderful sense of community through playing with their dogs at this park.

Frankly, I'm tired of getting squeezed out. People with dogs deserve open spaces to enjoy with their pets as much as children deserve a playground.

Sincerely,

Steven Kacsmar

Correspondence ID: 678 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 15:12:48

Correspondence Type: Web Form

Correspondence: I would like to comment on proposed dog access changes to two beach locations, Ft. Funston and Rodeo. I live in Concord, California. There are no off-leash dog areas here. We have a dog park, but it is small and has no trees. My dogs won't even run there. Mt. Diablo State Park trails are completely closed to dogs (even on a leash). So every weekend, we take our dogs either to Ft. Funston or Rodeo Beach to get some exercise. A nice off-leash dog area is extremely important to my family. It seems like dogs are already prohibited from going almost anywhere, so I love and greatly appreciate the few places that we can currently take them.

Please consider charging each dog a yearly "park entry fee" that would cover all Bay Area dog accessible beaches. That fee could help pay for maintenance and other dog-related expenses. As it is, I have to drive over one hour to get to a decent off-leash park. Please do not take these wonderful beaches away from my family and me!

Ft. Funston: The off-leash area would be limited to the beach between the

two parking lot beach entrances. This is a TINY area compared to what is allowed now. With the dogs spread out as they are now, the area is very enjoyable. With all of the dogs concentrated into one very small beach area, I can foresee problems. Add to that the influx of dogs from other closed areas, and I can see it being a real problem.

Please keep this entire area open to dogs. You could still preserve the current dune areas that are isolated with fences. I think that it is better to maintain a few really nice dog beach areas, so that people will continue to use them. Restricting every beach is asking for people to break the law. If people still have several really nice dog areas, they will go there and leave the other beaches to the people who do not like dogs.

As I said above, you could either charge a yearly fee for each dog that would allow them entrance into all Bay Area beach parks, or else charge a day use fee per car that enters this park. I would GLADLY pay either, and would be happy to support an activity that I love so much.

Rodeo Beach: I think that the planners got this beach plan backwards. It makes more sense to me to have a small section of beach near the parking lot that only allows leashed dogs and then allow unleashed dogs on the central and southern ends of the beach. I would prefer the entire beach to continue to have dog access. As with Ft. Funston, I would gladly pay an entry fee. This is the only beach in the area that allows dogs. Please allow a few beaches to remain dog-friendly. Then people without dogs can choose to go to one of the many dog-free or leashed-dog beaches.

Thank you.

Correspondence ID: 679 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 17:03:24
Correspondence Type: Web Form
Correspondence: GGNRA Dog Planning Commission:

I am concerned about proposals to limit voice-control dog walking in Crissy Field, Ocean Beach, Fort Funston and other parks in the Bay Area.

Dog walking is very important to me. When I walk my dogs, I can get out and enjoy Nature. Neighbors get together when we walk our dogs and this provides an important form of community bonding.

I am very concerned about protecting the environment. I am very conscientious about picking up after my dogs. I am concerned about protecting the tall trees and plants that grow where I walk my dogs. I am

also concerned about protecting the birds and small animals nearby, as are my neighbors.

Having people walking their dogs in a park adds to the safety of the park. Desperate people who are intent on doing harm to others have often kept away from the areas where we walk our dogs, because we are there. Some men were stealing purses from women with small children in a nearby park, because dogs and dog walkers did not go there. Dogs and dog walkers can be a deterrent to crime.

Last night an old man slipped and fell on the wet sidewalk. Because I was there walking my dogs, I was available to help him stand up. Dogs and dog walkers can add safety to an area.

Please endorse Alternative A (no action) so that the current dog walking practices can continue.

Correspondence ID: 680 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 17:41:03
Correspondence Type: Web Form
Correspondence: Dear Sir/Madam,

I am writing about the dog rules for Chrissy Field and it's beaches. The huge increase in dogs over the past five years has been truly amazing and the destruction these dogs cause to the delicate vegetation is very concerning. Furthermore I am very concerned with the large number of dogs urinating on the beach and some minority of owners burying their dogs feces in the sand as I have seen on a few occasions. These activities are very dangerous to children playing on the beach and I would encourage you to designate special beach areas for dogs to roam leash free and the main part of the beach(1)by Anita rock and (2)west of the old Coast Guard Station, dog free.

Thank you.

Bernard O'Driscoll San Francisco

Correspondence ID: 681 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 18:13:12
Correspondence Type: Web Form
Correspondence: As a owner of a well trained 15 pound dog that is taken by a responsible dog walker to the beaches every day, and often time taken by myself or someone else close to the dog on weekends, I would like to say I disagree with this

act. I think it is very important to have off leash areas that dogs can enjoy in order to get their energy out in an effective manner. I do believe owners and dog walkers need to take responsibility for their dogs and be sure that dogs that are not safe off leash are kept on leash, but for those dogs that are well behaved I do not see a need to change the off leash areas. Dogs are one things that define this city and I do not think that should be taken away! It is going to cause tramedouse problems for the people that take care of our loving pooches every day if we restrict the areas the dogs can go.

Correspondence ID: 682 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I live in San Francisco and pay property taxes. My dog is my companion and he needs a place to be free. Please do not take the resources away from us.

Correspondence ID: 683 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 18:37:06
Correspondence Type: Web Form
Correspondence: Please keep chrissy field open to off leash dog play! I've gone there just about every saturday with my now 14-year-old dog, and 99% of the time have seen no issues with the dogs/dog owners and non-dog people. I'm not sure where the call for change is coming from, but if i was to guess based on typical SF politics it's from a very vocal super-minority.

Couple points: - most dog owners go in the AM, when there are few non-dog people there (typically a 1-10 ratio of non dog/dog people. - at least in Chrissy field, the dog owners are very good about picking up the poop - The only time it gets a bit crowded is on the handful of weekend days (3-4 a year, if we're lucky) when its actually warm enough to sit on the beach! Even then, most dog owners move the dogs down closer to the GG and there are no issues. - If there actually are real incidents (like a dog biting someone, etc) then those should be dealt with strongly and on an individual basis. do not punish the majority of responsible dogs/dog owners!

My Saturday mornings at Chrissy are at the very top of the list of why i love (and live in, pay property taxes in, etc) San Francisco!

thanks!

Correspondence ID: 684 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 19:43:06

Correspondence Web Form

Type:

Correspondence: As residents of San Francisco for almost 2 decades, my family and I have enjoyed the GGNRA off-leash dog areas for many years. We go to Fort Funston about 3 days every week ? sometimes more. These visits for exercise and fun are essential to a balanced life for all of us.

The proposed changes to the GGNRA's off-leash dog proposal are very concerning to me. Dogs need exercise everyday. For dogs to be healthy and well behaved they have to regularly run off-leash and we need places that are safe and big enough for them to get this critical exercise.

The proposed changes ? especially to Fort Funston where we generally go ? seem illogical and arbitrary. I think they will be challenging to implement and open to a huge amount of confusion and potential unintended non-compliance. This leads to my second concern with the Compliance-based Management Strategy component of the proposal that allows the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions.

The fact that the GGNRA can unilaterally circumvent the legal requirement that management changes that are either significant or controversial must have a public process before they can be made is also deeply troubling. There needs to be a protocol to address potential updates to the off-leash dog status in an open, public and inclusive way.

The GGNRA and federal government are stewards for the American people. These organizations must work equally and fairly with ALL constituents. They may not act unilaterally to further a partisan agenda but rather must act in the interest of everyone. The Preferred Alternative expressed here is not fair and equal and needs to be reconsidered.

Correspondence ID: 685 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 20:20:36

Correspondence Web Form

Type:

Correspondence: I think that this proposed plan is an absolutely horrible idea. What makes San Francisco, especially Baker Beach, Chrissy Field and the Presidio, so great, is the ability to share the beautiful places with our favorite furry pets. Dog owners are, as a majority, respectful people, and with the threat of losing these spaces to share with our dogs, would be willing to make necessary changes in order to keep these places free to walk with our dogs. Please DO NOT PASS THIS PLAN!!!

Correspondence ID: 686 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 20:32:47
Correspondence Type: Web Form
Correspondence: I was be greatly disappointed if access to our parks and beaches for dogs was further limited. San Francisco is an amazing city, partly because of the presence of dogs. Eliminating that would change the vibe and livelihood of the city. Please reconsider closing our beaches and parks to dog.

Correspondence ID: 687 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 20:58:43
Correspondence Type: Web Form
Correspondence: Please do not limit the amount of off-leash park space in San Francisco or the general Bay Area. There is currently limited off-leash availability, and further limiting the space will only result in overcrowding of the remaining space. In addition, exercise and play time are important for dog health, mental well-being and social adjustment. Requiring dogs to remain on leash limits their ability to run and play freely and get adequate exercise. Furthermore, SF and Bay Area dog owners are extremely conscious about cleaning up after their pets and ensuring that their dogs do not bother or interrupt other park/beach users.

Correspondence ID: 688 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 21:41:59
Correspondence Type: Web Form
Correspondence: I'm a taxpayer, a dog owner, and I vote. I oppose the theft of the use of public lands from the dog owners of San Francisco and the Bay Area. This isn't pristine wilderness we're talking about - these are public beaches, former Army bases, etc. Let us, and our well-behaved dog, continue to use OUR LAND.

Correspondence ID: 689 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 21:46:27
Correspondence Type: Web Form
Correspondence: In addition to being one of the most beautiful spots on Earth. the San Francisco Bay Area is a top destination for people of all races, religions and backgrounds to move to because of it's tolerance for diversity. People in this area are educated, open-minded and accepting. We love our planet and do more than most to ensure it will survive us.

We also love out pets. We live here because we can enjoy our pets in the beauty of our surroundings without feeling like criminals. For the most part, pet-owners in the Bay Area are responsible and considerate of our non-pet owning neighbors. We are respectful of native wildlife and their habitats in the area. We're a responsible an self-policing group who understand the need to share this beautiful spot we call home.

Why are we being punished by the implementation of this plan? Who is benefitting from this plan? What are the major complaints against dogs in the current off-leash areas.

This is a bad idea...it can do nothing but harm this area and it's attractiveness to visitors.

Correspondence ID: 690 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 22:59:03
Correspondence Type: Web Form
Correspondence: I love Funston, because where else can I go on a 3-mile run with my dogs surrounded by such beauty!?. Of course, to be able to continue running with my dogs, they would need off-leash privilege on the paths I run with them on, as shown on the Funston Map 16-A.

Correspondence ID: 691 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 01:07:51
Correspondence Type: Web Form
Correspondence: If there is uncertainty regarding where dogs are allowed off lease, education and better signs are the solution, not restricting areas that make San Francisco what it is. As a dog owner, I'm responsible and know where my dog is allowed off leash, it's often the other visitors that have no idea and wonder why dogs are running around off leash. I don't put blame on them completely since there is no obvious sign usually informing visitors.

Please don't make the suburbs more pet friendly than the lovely city of San Francisco.

Correspondence ID: 692 **Project:** 11759 **Document:** 38106
Received: Feb,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Gentle People - Please do not exclude our pets & us from the Public

Parks. Reduced work weeks, higher taxes & fees etc etc - leave us no pleasure except to hitch a ride to the park with the only thing I have left to love my dog. I walk to my (???) 2 miles a day to (???) 4.00 to eat. I don't have a car(?) and my neighbor gives me a ride to the park once a week. Leave us some joy

Correspondence ID: 693 **Project:** 11759 **Document:** 38106

Received: Feb,17,2011 10:00:06

Correspondence Type: Web Form

Correspondence: Dear Sir/Madame, Your proposals are a complete breach of the rights of a significant proportion of the Bay Area population, Dog and their owners. Mandatory leash only or outright dog bans in the extremely limited off-leash areas are cruel and unusual punishment of our canine friends who require free running to remain healthy.

Dog owners show more respect to the limited area where they currently can take their pets than most of the population. We use these spaces daily and show consistent concern that all people and pets have equal respect for each other for both safety and enjoyment. Less than 5% of our public lands are open to dogs for off leash exercise (ABSOLUTELY mandatory for a health dog). To ask these small parcels available remain so is an absurdly small ask for tax paying residents.

The ALTA Trail above Marin City is used by 100s of people and dogs every single day for exercise. How dare you suggest this should be leash only. I walk this trail everyday and 99% of the people out there are dog owners with their pets.

That you suppressed the demands to off a LANDSLIDE majority for some angry 2 or 3 dog haters is a complete breach of your responsibilities to the majority of tax payers enjoying this and other spaces.

Your proposals are misguided, and appear to be based upon hatred and ignorance a small set off angry racists.

Correspondence ID: 694 **Project:** 11759 **Document:** 38106

Received: Feb,17,2011 10:30:15

Correspondence Type: Web Form

Correspondence: Off leash dogs are out of control in San Francisco and in general in the bay area. I support the proposed leash law changes to protect the wildlife and people. Further, I suggest that the following steps need to take place:

1. The current leash laws and the proposed leash laws must be enforced. Park police should ticket any dog walker with a dog off leash. Also, civilians will call to report leash violations and the violators should get heavy fines. These fines should increase (double) with each violation. First violation \$50, second \$100, third \$200, fourth \$400, fifth \$800, sixth \$1600, seventh - 2 year ban from the park and \$10,000 fine for each violation of this ban.

2. All dog walkers should have to obtain a permit to have their dogs off leash (suggest having fenced off areas for this). Once they have this permit, their dog will wear a specific collar or something to identify them as permitted. To get a permit, a dog must pass a rigorous voice control test. This would mean simulating (or you could do it in the park) distractions and background noise. This test should be required annually and should cost \$3,455 a year. The dog must also be up to date on all vaccinations to qualify for a permit and have no record of aggressive behavior. This fine for having a dog off leash without a permit should be \$10,000.

3. All professional dog walkers should be required to have a permit to walk their dogs off leash or on leash. They must pay per dog. If they wish to get a permit to walk 2 dogs this means they pay \$3,455x2 a year. If they wish to walk 4 dogs (should be the max), this means they pay \$3,455x4 a year. Could consider increasing the cost given that they are a business. Also if the park decides that they want to let commercial dog walkers have more than 4 dogs, the cost for each additional dog over 4 should be \$4982 an extra dog.

4. Dog owners whose dogs are witnessed to be destroying the environment (digging in the park, going off trail, chasing birds/animals etc) should be subject to a \$5000 fine. These dogs may be seen by park officials or they may be reported to park officials by civilians. If they wish to contest the fine, they must show up in court on the date they are assigned.

5. If dog walkers are unable to abide by these rules within 6 months of their implementation, dogs should be banned from the GGNRA all together. There are plenty of city parks that don't enforce leash laws. (even though they should)

Thank you for considering these suggestions.

Correspondence ID: 695 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 11:10:45
Correspondence Type: Web Form
Correspondence: "Where conflicting interests must be reconciled, the question will always be

decided from the standpoint of the greatest good of the greatest number in the long run." Gifford Pinchot, Chief Forester, 1905

Fort Funston: Off-leash dog walking should remain as is.

I believe the use of this public land should be decided on the Utilitarian principle based on Pinchot's quotation above.

I am all for conservation. As a matter of fact, I highly recommend the US Forest Service Centennial film *The Greatest Good*. It is the epic story of the struggle to manage our nation's resources.

If you have ever been to Fort Funston on a weekend, then you have seen the overwhelming number of our citizens and their dogs who utilize this off-leash area. I estimate thousands weekly, although since there is no sign-in, I don't know if anyone has a true count of the usage. Based on that fact alone, I believe the land is being used for the greatest number of Bay Area tax payers.

Yes, it's nice to know the history of the land but without the dog community this area would be sorely underutilized.

Others besides dog walkers use this multi-purpose area without discrimination: Hang gliders, model airplane flyers, kids learning to ride bikes and scooters, parents with strollers, seniors and those in wheelchairs. My personal experience, at the park several times a week, is that everyone gets along just fine.

I don't believe that having dogs off-leash causes any measurable threat to the environment or to other's rights.

Over the years there have been many discussions regarding habitat restoration, permanent restroom facilities, as well as the protection and public usage of Fort Funston. Sadly, the federal government has no money to fund projects.

I was very disappointed in Californians in the last election when proposition 21 was defeated. For a meager \$18 vehicle fee increase, most California vehicles would have gotten free admission and parking at state parks and beaches. Obviously, the value of our parks was not a priority to the 57% of the population who voted NO on this measure.

That being said; those of us who use Fort Funston for recreation to walk and run with our dogs know what a treasure we have and greatly appreciate this area and all the citizens who use it. We take great pride, care and concern

over this space.

Donna Abbott & Roxie, the black lab hound - San Francisco, California

Correspondence ID: 696 **Project:** 11759 **Document:** 38106

Received: Feb,17,2011 11:42:10

Correspondence Type: Web Form

Correspondence: My name is Russ Pritchett, a resident of Montara for 14 years, the San Mateo coast for over 20 years, and a member of the Montara Dog Group. I am a frequent user of the Rancho Corral de Tierra (Rancho) open space on the Northern boundary of Montara that is to be incorporated into the GGNRA. My primary use of the open space is for daily exercise with my family (including my dog): hiking; mountain biking; dog training; and, dog fetch games.

The Dog Management Plan treats the Rancho as New Lands, proposing a management system (Alternative D) that bans all dogs from the open space. I am writing to express my opinion that Alternative E of the Dog Management Plan should be considered as the default option for "New Lands" and specifically for the Rancho Corral de Tierra.

Alternative D for New Lands fails to recognize that in an urban recreation area, such as the GGNRA, New Lands will inevitably be adjacent to suburban areas where residents have long established dog walking practices. By default, New Lands are considered pristine wildlife areas worthy of most stringent environmental controls, regardless of location or history. With Alternative D, off-leash dog walking will not be considered under any circumstances. This alternative is not flexible or adaptable to unique situations that will inevitably arise with New Lands. Further, Alternative D uses a "closed unless open approach" that is the more stringent than the dog management approach used in "319 other NPS sites" across the country. Alternative E, on the other hand, allows dog walking in a manner that is consistent with other National Park Service (NPS) locations across the country and leaves open the possibility of off-leash dog walking in areas with well established practices. Alternative D is draconian, inflexible, and completely fails to accommodate many existing users of New Lands.

The reality of implementing Alternative D in the Rancho is that a majority of the Montara open space users will become federal criminals if they continue practices that have been followed for years. Members of the Montara Dog Group, in the future to be known as the dog-walking criminals, have voluntarily established and maintained dog waste cans at six locations on Rancho lands, bounded on the north by McNee Ranch State park and the south by Montara. It should be noted that human-generated

trash also ends up in these cans. Members who fail to clean up after their dogs are routinely called out by others who desire trails that are trash free (dog generated or otherwise). Additionally, recommended dog-walking practices have been established and posted on the Montara Dog Group website. These practices show respect for other users of the open space, whether they be dog walkers, joggers, bikers, or equestrian users. Are these the actions of criminals?

One public meeting was held in Montara by the NPS to solicit input for the incorporation of the Rancho into the GGNRA. A large contingent of dog walkers from the Montara Dog Group attended and presented a petition to NPS representatives that summarized our desires that existing off-leash practices be considered in a small fraction of the land that encompass the entire Rancho. This land is not a pristine, wildlife area. It has been previously used for agricultural purposes, slated for track home development, and was also targeted for the Devil's Slide bypass highway project. As instructed by NPS representatives, many individual comments were submitted in writing on small, post-it notes. We were told these comments would be kept in a record and considered in formulation of a plan. Park service representatives replied that no official responses could be made until the Dog Management Plan was released. Further meetings were promised; yet, no meetings have occurred. Apparently the official NPS response has been to lump the Rancho in the New Lands category and ban dog access with Alternative D, essentially ignoring the input of a large percentage of the local community that regularly uses the Rancho. Why has the input from the local dog walking community been ignored?

Although the NPS officials were unwilling to negotiate dog-walking usage of the Rancho with members of the local dog-walking community, they were willing to negotiate with other user groups prior to the incorporation of the Rancho into the GGNRA. A local equestrian group was concerned with the possible relocation of the stables located on the Rancho and with continued use of the Rancho lands. As should be the case, this groups' concerns were heard by NPS officials, and an agreement was successfully reached. If the NPS was willing to work with one user group, why was input from the local dog walking community disregarded? The dog walking community expects similar consideration and respect from the new stewards of the Rancho land, the NPS.

Alternative D will have a negative impact on the safety of local residents attempting to responsibly exercise their dogs. Montara is within unincorporated San Mateo County: there are no public parks within our boundaries; there are no sidewalks on local streets. A large number of Montara residents exercise their dogs on Rancho land because it is adjacent to our town and it is safe. Last year, a local residents' dog was hit by a car while being walked on-leash on a local street. In January 2011, a local

resident and dog were both hit by a car on Highway 1. In short, there is not a safe alternative to the Rancho for exercising dogs in Montara.

As mentioned, Montara residents exercise their dogs on Rancho land. Our family has been fortunate to socialize our dog from the age of 4 months with other dogs and people on the Rancho. I am certain that if our dog was confined in a small yard or indoors all day without access to Rancho lands, she would exhibit traits that people detest in dogs (aggressive behavior and incessant barking are two examples). Alternative D will have a negative impact on the ability of local residents to properly socialize & train their dogs.

The benefits our family has received from our dog has gone beyond the stereotypical characterization of "mans best friend." Since our dog requires regular exercise, we hike & bike more than we ever did before (with our dog, of course). We have lost weight and are healthier. Further as we have raised our dog, we have met more friends in Montara than in the previous 10 years we lived here. I know that I speak for many in our community when I say that the Dog Management Plan's preferred alternative for New Lands, Alternative D, will negate these positive aspects.

Correspondence ID: 697 **Project:** 11759 **Document:** 38106

Received: Feb,17,2011 00:00:00

Correspondence Type: Web Form

Correspondence: While I no longer live in the Bay Area, I grew up there and still visit my family. Leash laws are very important to communities as a whole, however, if there is a dog park that allows a dog to "stretch its legs" and socialize with other dogs, leashes should be optional. It's not the dogs that are the problem/issue, it's the owners of the dogs. Owners are the ones who should be educated on keeping the space clean. It's no more than they would do at their own homes -- I hope.

Correspondence ID: 698 **Project:** 11759 **Document:** 38106

Received: Feb,17,2011 12:03:05

Correspondence Type: Web Form

Correspondence: Regarding Mori Point dog walking. I'd like to suggest using two (2) areas for "off leash" walking. First site: Approximately 100 yards WEST from the Moose Lodge there is a small bowl (approx 3 acres) located between the service road/trail and upper hiking trail. That bowl would allow off leash dog walking away from the main park habitat/trails. Second site: Far west, adjacent to the beach, at the SOUTH end of the berm there is a small grove of Cypress trees (approx 1 acre). This site would require some fencing, but

it would serve the off leash dog walking community well. Steve Salisbury

Correspondence ID: 699 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 12:45:46
Correspondence Type: Web Form
Correspondence: To Whom it May Concern After reading the document i find it hard to believe that your group finds it effective to take away deemed recreational areas for people and their dogs. I frequent Crissy Fields and have a lovely time with my dog both on and off leash. I see other Guardians being very responsible for their dogs and for picking up after them and of course respecting on leash in the habitate guarded areas. We need to have out door areas to walk our dogs for so many reasons. It is heathy and safe in these areas. PLease dont take them away

Correspondence ID: 700 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 14:19:09
Correspondence Type: Web Form
Correspondence: FORT FUNSTON

The picture of my kids running with our dog, my daughter's hair flying, the dog's tail spinning, is to me, a sight of extreme beauty, exhilaration and joy. It's a picture of happy childhood days. I seek out these off leash places to recapture this picture. Every time, I feel immense gratitude that this is still possible, in a world where children are getting increasingly nature deprived. We got our dog, my first, a couple of years ago from a shelter. It was immediately apparent that 'walking the dog' is a terribly inapt expression. Anyone who has seen a dog sprint, scamper, play and run for balls and twigs, realizes this in a split second. Dogs were made to run. Children were made to run. After discovering Fort Funston, we've called it 'Disneyland for dogs'. It is worth a special trip. As we approach our dog will whimper with excitement. There are always tons of dogs of all different breeds and sizes. On sunny weekends it is packed. An enormous amount of JOY, in people and dogs alike, is generated at Fort Funston. It would be a sad day if that JOY was killed by restrictions.

Correspondence ID: 701 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 14:41:44
Correspondence Type: Web Form
Correspondence: This EIS is generally scientifically accurate but I don't think it clearly explains exactly how much damage that dogs do to crissy field, fort funston,

the presidio, ocean beach and all the other areas in the SF GGNRA. Dogs get away with way more damage than is reported. In my experience, I see dogs off leash tearing up the land, going off trail and leaving their waste behind. Most dogs i see are not only off leash but off voice control and even worse out of sight control. While, I generally support the preferred alternative, I actually think stricter leash laws and more dog free zones would ensure that the environment is preserved for those who come after us.

In terms of the impact on humans, this is also way understated. Most adverse events due to dogs are not reported and thus go undocumented and unnoticed by the ggnra. Dog walkers with dogs off leash (and even on leash) adversely affect the experience of many many people. This has been a problem for the decades that I have been in San Francisco. I get into an argument with a rude dog walker daily who doesn't care that their dog is off trail and destroying native plants. Why do we ask volunteers to plant these if they are just going to be destroyed by dogs?

Dogs, people who are not comfortable with dogs and the environment can obviously not co-exist. The last several decades at least has proved this. Dogs have been dominating and ruining the park for the rest of us. I have seen dogs on a daily basis destroying the park that I and many other people would like to enjoy. I have observed dog walkers yell and threaten other people who express any concern or even mention that their dogs are off leash. This means that people who are not comfortable with dogs are currently not welcome in the park. This includes certain cultures that are in generally not comfortable with dogs. This includes certain racial minority group and also certain religious groups that can not interact with dogs. Additionally the blind and the disabled also use the parks less because of dogs. There needs to be more dog free zones for these groups.

Correspondence ID: 702 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 14:45:24
Correspondence Type: Web Form
Correspondence: There are very few places in the city where dogs are allowed to run off leash. Fort Funston is a fantastic resource for dog owners to be able to exercise their dogs in a natural environment without having to worry about car traffic and other dangers of the city. I'll admit that if this plan is implemented, I have no reason to go to the GGNRA. Taking this option away would remove one of the main reasons I love living in the Bay Area. I understand the need to reign in abuses, but this measure goes too far.

Correspondence ID: 703 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: I am a resident and have a business in Foster City. I am also a dog owner who goes to Fort Funston at least twice a week for the unabashed joy and socialization both my dog and I enjoy while there. Often my son and husband join us and everyone is always amazed at how well the dogs and people interact together. My dog was an emaciated and frightened rescue who was very afraid of people and this regular interaction completely cured her.

We pay taxes, dog license fees and keep the areas we enjoy clean.

Correspondence ID: 704 **Project:** 11759 **Document:** 38106

Received: Feb,17,2011 16:14:40

Correspondence Type: Web Form

Correspondence: I take my two dogs to Ft Funston or Crissy Field at least once, usually twice a week, year round, so I am very interested in the proposed reductions of off-leash areas. I heard one of your representatives on the radio just after the draft plan was released. He used the word "balance" an awful lot, which I suppose means balancing the needs and desires of various park users. So are the plans for Funston and Crissy balanced?

Crissy Field. Yes, you got that one exactly right. There needs to be a section of beach where families can picnic or just lie on the sand without being annoyed by dogs . Some dog owners may not believe it, but even a perfectly friendly, curious dog can be an annoyance to some. East Beach is the logical place for this. Central Beach and the airfield might get a bit more crowded, but for such an urban park that's a really large off-leash area. And yes, the main trail should be on-leash. There's just too much traffic for dogs to be running loose.

Fort Funston. Not very balanced. The plan for the beach is fine, but your objective for the cliffs seems to be to reduce the off-leash area to a bare minimum. And to what end? Where is the imbalance you are trying to balance? Unlike Crissy Field, where many dogless people recreate in various ways and people with dogs are clearly a minority, the majority of people who use Funston go there with dogs (you may have better numbers, but it seems to me 2/3 to 3/4 of the people on any given day) and many of those without dogs are hang gliders and model plane fliers who don't use the trails at all. You want to cram all the dogs whose owners/walkers don't want to go down to the beach into a tiny area that looks to be about the same size as the airfield at Crissy, where the dog density is much less. That's not a dog walking space, it's an unfenced pen in which my dogs and I will be allowed to walk in circles along with a couple hundred other dogs until we all get

bored and go home.

Call me cynical, but I think you must be getting brownie points from some bureaucrat in Washington for each acre of off leash area you eliminate so he can claim to have brought GGNRA more into compliance with Federal rules. Ok, so be it. My preferred alternative is "Ft. Funston ain't broken, so don't fix it", but you're going to do something, so here is a possible compromise: combine alternatives C and E. That would provide enough space to take a proper walk and would allow a mostly off-leash loop from the parking lot, down the sand ladder, up the Beach Access trail and back to the parking lot (my personal favorite route). This should include portions of the Horse trail that probably hasn't seen a horse since WWII.

A final note: part of the Beach Access trail should be off-leash. This "trail" (most of it is a swale or wash) provides very poor footing and it can be a bit tricky going up or down even without an excited dog on a leash. Better to start the off-leash area where the trail widens and becomes steeper, about 50 feet from the paved trail.

Correspondence ID: 705 **Project:** 11759 **Document:** 38106

Received: Feb,17,2011 17:42:34

Correspondence Type: Web Form

Correspondence: After reading a good portion of this document, The executive summary and chapter 2 as recommended, it seems to me that the options provided are going to be quite difficult to enforce. I understand the concern with the large volume of dogs and dog walkers around verses the visitors, but why not have specific dog beaches and trails that are off leash and the rest would be completely off limits to dogs. That way visitors know that there will be no dogs in certain parks that they are visiting, and dog walkers/dog owners will know which trails and beaches they can take their dogs to. Crissy Field in particular seems quite difficult to enforce in terms of specific areas being on leash verses voice control, but right now if you want to make the snowy plover area completely off limits to dogs then do it. There is a huge beach and grassy area for dogs to enjoy (which they do the other 10 months out of the year when they can't go in the restricted conservation area) otherwise.

When I moved to this city, one of the main thing that attracted me here (as I own two dogs) was the beauty of being able to walk my dogs at Crissy field right by the Golden Gate bridge off leash! It has proven to be better for my dogs as they are better behaved than where we used to live as they have to be to be under voice control. Now that we live in Mill Valley, I know there are certain trails that dogs can only be on leash and I just don't go there. I only go where I know they can be off leash as it is more enjoyable for me

and for them.

So if there are restrictions that need to be made due to wildlife concerns then don't allow dogs there. But don't make it harder on the people who actually have to enforce these laws by making each place a complicated series of laws per area. Also, to be able to explore the area with my dogs is a precious thing that I hold dear to living in this area. I hope that those of us with dogs will not be restricted to 2 or 3 trails and one beach, but can find many places to roam together.

Correspondence ID: 706 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 18:32:44
Correspondence Type: Web Form
Correspondence: This plan is garbage. The anti-dog plan is anti-family.

Correspondence ID: 707 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 19:44:52
Correspondence Type: Web Form
Correspondence: Dogs and their guardians should be able to continue to enjoy the GGNRA recreational areas.

Correspondence ID: 708 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 22:08:41
Correspondence Type: Web Form
Correspondence: Prohibiting off leash dogs at these locations is a terrible idea.

Correspondence ID: 709 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 22:19:22
Correspondence Type: Web Form
Correspondence: To Whom It May Concern:

Please do not ban dogs from Muir Beach and other park areas. But especially Muir Beach and Chrissy Field. This is what the Bay Area is about.

The people that come to Muir Beach with dogs are lovers of the beach. They treat it with respect. We have been to the beach countless times with Willy, our yellow lab. Nothing makes him happier than running along the beach with a ball. I often see other visitors of the beach watching him and his joy and, in turn, smiling. He does not go in the areas that are restricted to dogs. That's not a problem. In all the times we have been to Muir Beach, I have never seen a dog violating the rules. It's much more likely to see people

throwing cigarettes and garbage onto the beach.

This is an important resource for dogs and their owners. Please do not take it away from us. I don't understand why dogs are being punished! Why don't we stop allowing the real damage-doers - people!

Please reconsider your extremely drastic dog cuts. Most dogs that come to the beach are good, well-loved dogs. We should not be treated like this.

Thank you, Kimberly

Correspondence ID: 710 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Having dogs on the beach is good for everyone.

Correspondence ID: 711 **Project:** 11759 **Document:** 38106
Received: Feb,18,2011 01:14:14
Correspondence Type: Web Form
Correspondence: I beg you to change the dog leash rules as they are today. There are barely enough spaces in SF for people to walk their dogs as is. I love going to Crissy Field and Fort Funston on the weekends and getting some fresh air. If anything, impose stricter laws on owners who don't pick up after their dogs - that is fair.

San Francisco is a great city. I've seen a huge flux of my friends moving b/c they had kids and it's too expensive or impractical. I would hate to see them taken a step further with no area for dog owners. I believe we are a big community, right. Are there not more dogs than kids in SF. Please keep this a great place to live

jonathan

Correspondence ID: 712 **Project:** 11759 **Document:** 38106
Received: Feb,18,2011 01:42:13
Correspondence Type: Web Form
Correspondence: Off-leash dogs, people and children can and should coexist in our beautiful bay area environment. This has happened for the last 30 years and I insist this be allowed to continue. We are responsible dog caretakers, pay taxes and we have rights which we demand that you do not take away from us.

Off-leash dogs are happier and better behaved when exercised. Humans

need to enjoy this experience with their dogs. This is a much needed outlet for us all in a busy urban life. Without off leash access in the GGNRA areas the city parks will become overwhelmed and overused.

Correspondence ID: 713 **Project:** 11759 **Document:** 38106

Received: Feb,18,2011 09:55:13

Correspondence Type: Web Form

Correspondence: Dear Sir or Madam,

PLEASE Do not further restrict Fort Funston and Land's End off-leash access!!!

While some of the proposals are OK, the Fort Funston restrictions I've seen go too far.

If Lands End is going to completely restrict dog access to one of the most beautiful dog walks in the city then you must at least allow greater off-leash access at Fort Funston. Being older I can not always walk all the way down to the beach at Fort Funston and need the large area available above the cliffs to walk my dogs.

Please save off-leash access for dogs in San Francisco. Dog walkers around my neighborhood in Bernal Heights make the neighborhood MUCH safer by patrolling our streets and parks. I'd hate to see these dog owners moving out of San Francisco because there is no access to a large area for an off-leash walk. If these dogs are forced out of San Francisco, then their owners will no longer be walking around our parks and streets making them safer.

Thanks, Michael Willingham

Correspondence ID: 714 **Project:** 11759 **Document:** 38106

Received: Feb,18,2011 11:44:55

Correspondence Type: Web Form

Correspondence: This would be a very sad change to San Francisco, San Mateo, and Marin Counties. Having these designated areas for dogs to be off leash has been a very safe and fair way to allow dogs and their owners to get the exercise and socialization they need to thrive. By limiting these areas as it is being suggested, it will severely limit the amount of space needed for many large and energetic dogs to burn off energy and get the exercise they need. It would be a travesty to the mentioned counties to slash the areas dogs are allowed off leashes. Please re-consider making these changes, as taking away these open areas will be devastating to both the dogs and the dog

owners.

Correspondence ID: 715 **Project:** 11759 **Document:** 38106
Received: Feb,18,2011 12:08:12
Correspondence Type: Web Form
Correspondence: I lived in San Francisco for over 20 years and now reside in Pacifica, but regularly use Fort Funston for it's off-leash dog allowance. I have a 5 year old well-trained yellow lab who is under both voice and hand signal control (yes, really - I spend a lot of time reinforcing his training, which is life-long). I always bring poop-bags with me (I use biodegradable poop bags from poopbags.com) and if I have left over bags I leave them in one of the kiosks for someone else to use. If I see a dog (not my own) leaving a mess and the owner is unaware, I point it out to them and/or pick it up myself. I try to be a good canine citizen (as does my canine). We love to come to Fort Funston to run and play in the surf and meet with other friendly dogs. Often, on cold and blustery San Francisco days (meaning more often than not, in other words) dog owners are the ONLY people in the Fort Funston area - everyone in sight has a dog with them. Therefore, if this area is dog restricted, I don't believe many people will use it (except for the hang gliders perhaps). This is an urban area - not some pristine wilderness - and has been a wonderful place for dogs and their human companions. Please do not take it away from us!

Correspondence ID: 716 **Project:** 11759 **Document:** 38106
Received: Feb,18,2011 00:00:00
Correspondence Type: Web Form
Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified.

Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a

Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 717 **Project:** 11759 **Document:** 38106
Received: Feb,18,2011 12:12:28
Correspondence Type: Web Form
Correspondence: Please keep current regulations in force instead of changing to onerous rules that benefit no one or the park. Please keep our open space open for everyone - dog people too who enjoy the beauty of our open natural spaces.

Correspondence ID: 718 **Project:** 11759 **Document:** 38106
Received: Feb,18,2011 12:16:40
Correspondence Type: Web Form
Correspondence: As a young man I worked as a seasonal ranger with the NPS and have always been an avid hiker. I was also an elementary teacher for a number of years, and always reveled in taking my students into the wilderness. Now as a grandfather with 5 grandchildren, I enjoy walking with them in our wonderful National Parks throughout northern California, and especially the newest system in what was the Presidio in San Francisco. Our National Park system was created to allow our citizens and our children to enjoy the natural wonders they contain - wild vegetation and extraordinary wildlife - in a setting that is in contrast to the urban environment that surrounds most of us daily. As a National Park, the Golden Gate Recreational Area is a very special case because it's so close to a densely populated urban area, and it allows our urban children the opportunity to experience a different reality from that which they see daily. If not for this special National Park, thousands of San Francisco's children will never have a real park experience - an esthetic experience that stands in stark contrast to their daily concrete urban existence. Dogs are a part of that urban, concrete life. Dogs have no place in a National Park. They disturb the wildlife, vegetation, and those of us who come to our Parks as a respite from the concrete world of the city.

Please keep our dogs and all pets out of our parks.

Dogs have no place in our National Park paradigm.

Correspondence ID: 719 **Project:** 11759 **Document:** 38106
Received: Feb,18,2011 12:39:24
Correspondence Type: Web Form

Type:

Correspondence: I support the alternative that does the most to exclude dogs whether on or off-leash from the GGNRA as much as possible. I think that as part of the NPS, the GGNRA should first strive to preserve its natural resources. I have seen firsthand on many occasions how dogs will chase birds on the beach and in other places. I also do not like to see dogs on trails due to their droppings and how they may affect the wildlife in the area. Please limit dog use in the GGNRA as much as possible. Thank you.

Correspondence ID: 720 **Project:** 11759 **Document:** 38106

Received: Feb,18,2011 13:41:45

Correspondence Type: Web Form

Type:

Correspondence: As a dog owner, I love taking my dog on the Miwok trail and to Muir Beach. Many days we hardly see anyone on the Miwok Trail and sometimes the only people at Muir Beach are people with dogs. If you have a well-behaved dog and clean up after your dog, there is no reason at all you should not be able to have your dogs off leash both of these places.

Most trails do not allow dogs. My dog is blind and very frightened by cars on the road. He needs a trail where he can run with me. I think it is really awful that you are considering these actions.

I am originally from the East Coast and one of the things I always LOVED about Northern California- long before I was a dog owner, was its more relaxed attitude and freedom about where dogs were allowed. Please don't become more restrictive! Our dogs are our best friends. We need natural beautiful places like Muir Beach and trails like the Miwok where we can let them roam and be dogs! Please don't take these freedoms away.

Sincerely, Ursula Connolly

Correspondence ID: 721 **Project:** 11759 **Document:** 38106

Received: Feb,18,2011 14:19:52

Correspondence Type: Web Form

Type:

Correspondence: Thank you for taking an exhaustive and comprehensive look at the impacts of user groups on our park lands. Please ensure that the lands, flora and fauna are protected for future generations. Preserving the GGNRA system should be the primary goal of the policy. Only responsible and low impact activities are consistent with that goal. The policy will be effective only if it is backed up with thorough education and enforcement.

Correspondence ID: 722 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,18,2011 14:21:46

Correspondence Web Form

Type:

Correspondence: Thank you for the opportunity to comment.

I support Alternative D because it offers the most protection to natural and cultural resources and visitors wanting a safe and most dog-free experience.

I lived in San Francisco for over 20 years and now visit frequently, including walking in many of the areas covered in the proposal in both San Francisco and Marin.

I stopped walking in the Crissy Field area because of the dog problem. I have been scared by aggressive dogs and their combative/defensive owners. Being able to have a dog-free or dog-limited (on leash only) experience would be wonderful. One of the many reasons for enjoying these beautiful places is to find a peaceful refuge from the stress of modern life. This is impossible under current circumstances.

Ideally, I would like to see dogs banned. However, at least they should be restricted to small fenced areas reserved only for dogs. Also, no matter what, dogs should always be leashed.

Correspon 723 **Project:** 11759 **Document:** 38106

dence ID:

Received: Feb,18,2011 16:40:22

Correspon Web Form

dence

Type:

Correspon I agree whole heartedly with Sally Stephens, chair of San Francisco Dog Owners
dence: Group. Where She has concisely stated that "the park was never meant to be a
"pristine wilderness," but instead was created as a multi-use natural resource for a
dense urban population." These parks are on the fringes of highly urbanised zones.
The impact of human activity on native wild life is going to be inevitable whether
they are walking their pets or not.

Has any one actually completed any comprehensive studies covering the impact of off leash dog walking on wildlife and natural habitat? It seems that a few wellfunded organisations have come to wield influence that is ultimately going to effect the freedom of Bay Area residents. The National Park Service U.S. Department of the Interior Inventory and Monitoring Program Research Project Summary August 2008 details numbers of off leash dogs and "bird chasing events". Whatever a bird chasing event is..... Is that where a dog runs down the beach and birds take flight? What about patrol vehicles, equestrians, dogs, joggers, and kite flyers. Do birds take flight when these potential disturbances are

present....? More than likely this would be the case. If the birds had a serious problem with the human disturbance they would pick an area of the beach that is less trafficked. Or pick a beach that is hardly trafficked at all.

http://science.nature.nps.gov/im/units/sfan/vital_signs/snowy_plover/docs/GOGA_Plover%20Monitoring%20Brief.pdf

Included in the text of the report is a statement "that habitat loss and degradation due to development, beach recreation, and encroachment by non-native vegetation have contributed to a decline in Snow Plover numbers..... " That indicates to me that there are a broad number of factors that are at play here. The Graphical evidence provided in the report also provides no direct correlation that unleashed dogs and Snowy Plover numbers are related.....? It seems that information concerning exactly why numbers of native wildlife are falling is woefully inadequate. Until comprehensive studies are completed it would be premature to place all the blame on one potential disruption.

How have dogs become the number one issue? It seems incredibly single minded to focus specifically on Dogs as the main reason any of the negative impacts of intense urbanisation have occurred in the GGNRA. I would like to voice my concern to the current policies of the GGNRA with regard to Dog Management. I would also propose that restricting this segment of the Bay Areas population is a little bit one sided and will be a detriment to future generations. The ability of children and people being able to interact with their pets in the natural environment helps with development, confidence and appreciation of the outdoors.

Correspondence ID: 724 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,18,2011 17:51:29

Correspondence Type: Web Form

Type:

Correspondence: This proposed legislation is more than upsetting not only as a dog parent who takes great joy in bringing my pet to these parks, but also as a concerned citizen. San Francisco is one of the most dog-friendly destinations in the entire United States and one of the most iconic. Taking away the ability to have your pet roam freely at these parks, which the plan does not even justify sufficiently, will most assuredly have a trickle down effect through the entire local economy. From tourism to licensed and certified dog walking businesses, to pet stores and veterinary hospitals, this unnecessary legislation will have an economic impact that has not been thought through

Correspondence ID: 725 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,18,2011 18:02:17

Correspondence Type: Web Form

Type:

Correspondence: I am a very considerate dog owner and feel that we need places where dogs can roam free. Life is ment to be diversified and if you take dogs off beaches and open space you take away the joy for all dog owners.

Correspondence ID: 726 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,18,2011 18:07:55

Correspondence Type: Web Form

Type:

Correspondence: While the protection of park patrons and designated environmental areas are important, severely restricting the options of dog owners is detrimental to the community at large. GGNRA parks are one of the few open areas that dog owners can let their dogs off their leash, ensuring an active lifestyle for the animal. Denying dog owners the ability to walk their dogs off leash will critically curtail the available areas where dogs can receive much needed exercise and play. One possibility is increasing the penalties for infractions on existing dog-leash restrictions, as well as ensuring protected environmental areas are off-limits.

Thank you.

Correspondence ID: 727 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,18,2011 18:48:06

Correspondence Type: Web Form

Type:

Correspondence: I support the alternatives that are the most protective to the wildlife and for human safety. I have human safety concerns about dogs off leash. I am one of the many victims of dog bites. I want to see on leash requirement as well as muzzle requirments everywhere for this reason. No human should be banned from a part of the park because dangerous animals are allowed to run free.

Here are some of the stats quoted from
<http://www.dogbitelaw.com/PAGES/statistics.html>): 1. 2% of americans are bitten by a dog annually. I would guess that most people have been bitten in their lives given that over a 50 year period, I don't think it is the same 2% getting bitten - (Sacks JJ, Kresnow M, Houston B. Dog bites: how big a problem? Injury Prev 1996;2:52-4.) Keep in mind that i myself have been bitten twice but only reported it once, so I would assume that 2% is a vast underestimation.

2. 1 out of 6 dog bites requires medical treatment

3. Getting bitten by a dog is the fifth most frequent cause of visits to

emergency rooms caused by activities common among children. (See Weiss HB, Friedman DI, Coben JH. Incidence of dog bite injuries treated in emergency departments, JAMA 1998;279:53)

4. An American has a one in 50 chance of being bitten by a dog each year. (CDC.) (pretty high compared to other things we would consider risky)

5. The trend for fatal dog bites as well as dog bites in general has been rising yearly since the 80's.

6. "Dog attack victims in the US suffer over \$1 billion in monetary losses every year. ("Take the bite out of man's best friend." State Farm Times, 1998;3(5):2.) That \$1 billion estimate might be low -- an article in the Journal of the American Medical Association reported that, in 1995, State Farm paid \$70 million on 11,000 claims and estimated that the total annual insurance cost for dog bites was about \$2 billion. (Voelker R. "Dog bites recognized as public health problem." JAMA 1997;277:278,280.)"

7. "According to the Insurance Information Institute, dog bites cost insurers \$412 million in 2009."

So, contrary to dog owners phrase "don't worry he's friendly," I worry a lot! The stress of being around dogs raises people's blood pressure and adversely affects their health. It raises mine. It also affects my mental health. I want to go to the park to relax but instead it worsen my mental health. Many I have talked to that have been bitten by dogs in the past exhibit signs of PTSD and the dog owner and dog's enjoyment comes at the price of the well-being of human being.

Correspondence ID: 728 **Project:** 11759 **Document:** 38106
Received: Feb,18,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I have been on a pilgrimage to see most National Parks and recently saw Yellowstone, Bryce, Zion and Arches, but realize that I have the best park back at home in Fort Funston. I like to join the crew on the first Saturday of the month to help collect trash and keep Funston clean. I discovered Funston because I walk my dogs there.

Correspondence ID: 729 **Project:** 11759 **Document:** 38106
Received: Feb,19,2011 00:20:54
Correspondence Type: Web Form
Correspondence: Please do not move forward with the proposal to limit the off-leash

accessible areas in California.

As a respectful dog owner who strives to provide a healthy, satisfying life for my animal, I urge the National Park Service not to restrict off-leash dog areas in California. In addition to the positive effects they have on the physical quality of life of the animals and their owners, the area's off-leash dog parks strengthen the community by uniting residents in a casual, social setting that encourages interaction and dialog.

Correspondence ID: 730 **Project:** 11759 **Document:** 38106
Received: Feb,19,2011 15:07:46
Correspondence Type: Web Form
Correspondence: As a San Francisco resident and dog owner, I am ABSOLUTELY OPPOSED to your new regulations, that will force most of us, law abiding dog owners to walk and run in other places, on the streets, creating a hazard for ourselves, our beloved dogs and to the traffic in general. This is an attempt to over regulate our lives and curb our freedom and is totally unjustified!!!

Correspondence ID: 731 **Project:** 11759 **Document:** 38106
Received: Feb,19,2011 15:30:40
Correspondence Type: Web Form
Correspondence: I have 2 kids and A lovely dog.. please do not limit the already limited places I can go with all 3!!

Correspondence ID: 732 **Project:** 11759 **Document:** 38106
Received: Feb,19,2011 15:34:26
Correspondence Type: Web Form
Correspondence: I support your rules limiting dogs running free. Dogs should be either leashed or excluded from multiple areas where they now run free, despite existng rules. Ocean beach in San Francisco is too full of dogs running wild, frightening off birds, children, the elderly and anyone who is not big, strong and totally alert. Crissy Field beach is full of dried dog poop and it is impossible to walk there without getting knocked over or having to make a major detour around dogs. My right to peaceful use of my limited free time in these beautiful areas is constently infringed upon by dogs. I am not going to these places in order to spend my energy to avoid, walk around, protect myself from or step in the poop of dogs. I am trying to enjoy nature and my life. I do not wish to, nor should I have to spend time asserting my rights to dog owners nor should I have to listen to rude talk or a long sad story about

their trouble with doggy diarrhea when I point out that they are not cleaning up after their dogs. I love to walk on the beach and be outside and as I grow older the dog issue has become more and more problematic. I do believe you are representing a silent majority by making reasonable rules about this.

Thank you, Teresa Palmer

Correspondence ID: 733 **Project:** 11759 **Document:** 38106

Received: Feb,19,2011 16:33:11

Correspondence Type: Web Form

Correspondence: I would clearly prefer alternative D which offers the most control of dog walkers and the most protection of wildlife and non-dog walkers. Although having dogs in our parks is a problem, the bigger problem is with the dog owners and walkers. Dogs can be trained in some degree, but apparently dog walkers cannot be trained. After all, they are the ones that claim confusion about where it is allowable or not. So, if this alternative (D) seems to be confusing, perhaps it would be best to simply ban dogs in all the Federal Park areas. The dogs won't care, as long as they get to be outside. The dog walkers may claim that their park experience will be affected, but they are free to enjoy their dogs elsewhere.

Correspondence ID: 734 **Project:** 11759 **Document:** 38106

Received: Feb,19,2011 17:42:25

Correspondence Type: Web Form

Correspondence: As a responsible dog owner, I would like to have continued access for my dog in the GGNRA, especially at Lands End, Fort Funston, Sweeney Ridge, Mori Point, and, Pedro Point.

I understand the impacts of dogs on wildlife and agree that dogs should be leashed in most places, but please don't completely outlaw the dogs. The "R" in GGNRA means Recreation.--It is not a National Park.

I feel that a portion of the beaches at Fort Funston and Ocean Beach should be open to off-leash use, with all other sites open to on-leash use.

Thank you for your attention.

Correspondence ID: 735 **Project:** 11759 **Document:** 38106

Received: Feb,20,2011 10:12:59

Correspondence Type: Web Form

Correspondence: I treat 100 dog bites a year in my job as Division Chief of Plastic Surgery at Oakland Children's Hospital. I've treated dog bite injuries in children from Stinson Beach and Mill Valley as well as from all over the Bay Area. I live in Mill Valley and we have dogs and children. I'm in favor of the new tighter restrictions because a sizeable portion of dog owners ignore the rules with regard to leashes and voice control at Stinson or in the NPS put children in danger of sudden, severe injuries. I can attest that while dog owners vigilantly maintain that their dogs would never bite, these injuries do happen unexpectedly and can be catastrophic. There are so many other places besides the NPS for dog owners to walk in Marin and all over the bay area. From my perspective treating an average of two dog bites a week for over 10 years and from living both at Stinson Beach and Mill Valley, dogs and people aren't coexisting well at Stinson and in the NPS and therefore restrictions are necessary and overdue. Please contact me if necessary. Thank you, Stephen Daane, M.D.

Correspondence ID: 736 **Project:** 11759 **Document:** 38106

Received: Feb,20,2011 12:35:29

Correspondence Type: Web Form

Correspondence: One of the things that makes San Francisco unique is its dog-friendly spaces. When I first got my dog Mango, a rescue, I was thrilled to find I could take my best friend with me to enjoy San Francisco's beauty- Crissy Field, Baker Beach, and Ocean Beach are 3 of our favorite weekend excursions. I can enjoy a walk looking at the beautiful scenery, and Mango gets to expel energy, socialize with other dogs, and smell all the scents. She gets to enjoy being a dog.

If the Dog Management Plan goes into effect, we lose a community. The dog owners in this city are, in general, a friendly group of people who enjoy getting to know each other and each others' dogs. Our dogs start playing together, and we start a conversation. Part of the reason I love San Francisco so much is because I feel bonded to the people, many of whom I've met while walking on the beach. Without dogs, I never would have met any of them.

I consider myself a responsible pet owner, and I am impressed with the other owners I see as well. I never see dog feces lying about, and the dogs are all under voice control. This morning I saw a boot camp group working out in the midst of several dogs, and the dogs were not approaching the people at all, as their owners kept them away from the group. Our dogs do not have heartworm or fleas, as we take them to the vet and keep them up to date on medication. They are just there to enjoy the space, not to have any negative impact on the environment.

Please do not create uptight regulations that prohibit our enjoyment of our city and all it has to offer. Please keep the 1979 Pet Policy in effect. Please keep San Francisco unique in this way, that we may experience the beauty of this place with our furry friends, who also have a deep appreciation for it. Thank you, Lauren Rolfe

Correspondence ID: 737 **Project:** 11759 **Document:** 38106

Received: Feb,20,2011 14:42:58

Correspondence Type: Web Form

Correspondence: One of the joys of going to the Big Beach in Muir Beach is watching the dogs of our community at play. This is a joy that brings happiness to all concerned -- four and two legged. We live in a tiny village in a rural setting there is absolutely no need to restrict out pets in this way. I've lived here for over eight years and have never seen dog feces left by their owners for others to deal with. Our dog owners are responsible. Please do not punish their pets with unwarranted restrictions.

Thank you for your attention. Elizabeth Benedict Muir Beach

Correspondence ID: 738 **Project:** 11759 **Document:** 38106

Received: Feb,20,2011 14:58:20

Correspondence Type: Web Form

Correspondence: Dear Sir/Ma'am,

I am a local resident of San Francisco and I regularly visit Lands End, Ocean Beach 4+ times a week with my dog. To keep my disability (chronic health condition) under control regular exercise is required.

I am not happy with the plans provided. While, I respect everyone's right to enjoy the scenic scenery, the GGNRA seems bent on giving off leash dog walkers a choice between, barely anything and nothing at all. The "Compliance-Based Management Strategy" is non-sense, if people don't obey the law then allow the GGNRA to ban off leash areas without public comment? Whatever happened to enforcing the law?

In addition, the forcing of all new areas given to the GGNRA to be on leash or no-dog at all, is slowly forcing all off leash walking of dogs to well.. nothing. As the GGNRA obtains more land for the public trust, the land should not be discriminated against dog owners from the get go!

By large and large, I haven't seen any problems with dogs, and for the problems that exist (poop), focusing GGNRA resources on ticketing those

people who don't pick up, is better than these countless documents!

Regards,

-daniel

Correspondence ID: 739 **Project:** 11759 **Document:** 38106
Received: Feb,20,2011 19:15:56
Correspondence Type: Web Form
Correspondence: I am very much opposed to any restrictions of dog access to Muir Beach. I have been taking my dog there for years and never had any difficulties or witnessed any affect to wildlife. Off leash on the beach works very well with rarely an incident. Please do not take this off leash dog access away.

Correspondence ID: 740 **Project:** 11759 **Document:** 38106
Received: Feb,20,2011 20:51:46
Correspondence Type: Web Form
Correspondence: As a long-time resident of San Francisco, I enjoying going to Fort Funston with my dog 2-3 times each week. This is the only place where she can run safely off-leash and get the exercise she needs. I am concerned that the changes being proposed will significantly affect the quality of life for both my dog and my family.

The new, proposed off-leash areas at Fort Funston seem unnecessarily strict and arbitrary. The plan at this location is confusing and illogical and has the potential to create a lot of unintentional non-compliance because it is so confusing.

This is particularly concerning since the Compliance-based Management Strategy component of the proposal allows the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions. The fact that the GGNRA can unilaterally circumvent the legal requirement to have a public hearing for any future changes is seriously concerning ? it is not the way we do things in America!

At Fort Funston, open areas that are basically uninhabited sand dunes (like the area to the east of the "beach access" path or the area between the parking lot and the water fountain) should not be closed down to off-leash use. There is no reason why these open areas that are perfect for dogs to run in should be restricted.

Today the park was full of people with dogs off-leash, hang gliders and other visitors happily and safely enjoying the park together. There is no need to change the current situation at all! The new proposal will seriously, negatively affect the ability of U.S. citizens who have dogs to access and enjoy GGNRA parkland with their dogs.

Correspondence ID: 741 **Project:** 11759 **Document:** 38106

Received: Feb,20,2011 20:55:46

Correspondence Type: Web Form

Correspondence: Please keep Fort Funston open as-is for dogs. I have not seen a happier place on earth for dogs and their owners. This is crucial to the well-being of many in the SF Bay Area and the proposed changes would have no documented impact on potential benefit to wildlife at all. I'm appalled that this even came up as an option.

Thank you.

If you want to charge per dog that enters the area I'm fine with that. That's how important this space is to us.

Correspondence ID: 742 **Project:** 11759 **Document:** 38106

Received: Feb,22,2011 08:06:24

Correspondence Type: Web Form

Correspondence: February 22, 2011

To whom it may concern,

I'm writing in support of the preservation for dog walking access throughout the Golden Gate National Recreation Area. I urge you to keep the parks open for dogs.

When you're considering the Environmental Impact Statement for dog management, please consider that animals have a wonderful impact on human lives. Studies show that we live longer and happier lives when we have a loving relationship with an animal. Part of that love is walking through a nice park. The majority of dog owners are responsible people, please do not restrict access because of a few irresponsible people.

Thanks for your consideration.

Sincerely,

Sara Schwab, San Francisco Resident

Correspondence ID: 743 **Project:** 11759 **Document:** 38106

Received: Feb,22,2011 08:13:39

Correspondence Type: Web Form

Correspondence: February 22, 2011

To whom it may concern,

I'm writing in support of the preservation for dog walking access throughout the Golden Gate National Recreation Area. I urge you to keep the parks open for dogs.

When you're considering the Environmental Impact Statement for dog management, please consider that animals have a wonderful impact on human lives. Studies show that we live longer and happier lives when we have a loving relationship with an animal. Part of that love is walking through a nice park. The majority of dog owners are responsible people, please do not restrict access because of a few irresponsible people.

Thanks for your consideration.

Sincerely,

Sara Schwab, San Francisco Resident

Correspondence ID: 744 **Project:** 11759 **Document:** 38106

Received: Feb,22,2011 08:41:04

Correspondence Type: Web Form

Correspondence: It seems to me that voice control for dogs on Muir Beach has worked. And, if it works, don't "fix" it. Muir Beach is a neighborhood beach and the neighbors control their dogs.

Correspondence ID: 745 **Project:** 11759 **Document:** 38106

Received: Feb,22,2011 09:44:44

Correspondence Type: Web Form

Correspondence: re: Sweeney Ridge As the environmental impact on continuing to allow dogs would be minor to moderate, please support option A - no change to this area. There are very few scenic hikes in San Mateo County that my family can take with our dog - PLEASE DO NOT BAN DOGS FROM

SWEENEY RIDGE!

PS I heard about this website, and the opportunity to comment, through the sign posted at the entrance to Sweeney Ridge at Fassler Ave in Pacifica.

Correspondence ID: 746 **Project:** 11759 **Document:** 38106
Received: Feb,22,2011 10:00:46
Correspondence Type: Web Form
Correspondence: The Crissy Field dog beach is an important and enjoyable part of our lives. We bring our Golden Retriever puppy to the beach and he is in dog heaven. We've never had or even seen any significant problems with other dogs or people. I understand some people may enjoy an area of the beach where dogs are not running free. I support East Beach being on-leash and Central Beach being off-leash, as well as the promenade and walking trails being on-leash.

Thank you, Kara Scoggins

Correspondence ID: 747 **Project:** 11759 **Document:** 38106
Received: Feb,22,2011 10:03:24
Correspondence Type: Web Form
Correspondence: I am writing to comment on the proposed plan for dog management. It is a shame that in an area where people and their dogs are a high priority that the government is considering reducing a major part of recreation that is unique to this region. My husband and I have been taking our dogs to Ft. Funston for many years, and it is evident that those that go there have a true respect for the area as well as for their dogs. The dogs have not had a negative impact on the landscape, and no scientific study has proven to the contrary. This area is well used because of the allowance of off leash usage, and freedom to enjoy nature with your dog. This area is not utilized by non dog walkers except for the hang gliders, and they co exist well together. This area would be a ghost town without the allowance of off leash walking as it currently stands. I hope you will not vote to destroy this natural beauty of man and beast.

Correspondence ID: 748 **Project:** 11759 **Document:** 38106
Received: Feb,22,2011 10:48:24
Correspondence Type: Web Form
Correspondence: I can count on one hand the number of nearby trails/beaches that I can take my dog with me today, with the number of off-leash possibilities even

smaller. This new proposal will do away with almost all of them- Homestead, Stinson Beach and Oakwood Valley. Where will I be able to take my dog?

I am a responsible dog owner- I clean up after my dog and she stays on the trail with me, even when off leash. Her impact on the trails and environment is no more and I would say even less than mine. Horses and even mountain bikers have a far greater impact on the trails and environment than dogs, yet they are allowed on almost all the trails and even beaches(!) in Marin.

I don't think it is fair to make a blanket sweep and ban dogs from almost all of GGNRA owned space when the dog access rights are already limited to start.

Correspondence ID: 749 **Project:** 11759 **Document:** 38106

Received: Feb,22,2011 12:22:53

Correspondence Type: Web Form

Correspondence:

I strongly support your efforts to control dogs in all National Parks, including the GGNRA. We live close to Miagra Ridge, Sweeney Ridge, Mori Point, and Fort Funston and walk in all these areas. We frequently see dogs off-leash, chasing wildlife and pooping where owners don't pick up after them. I urge you to adopt the strongest plan, probably Alternative D, to protect people, wildlife, soil, and the serenity of the Parks' surroundings.

Please consider the following factors:

1. Dogs do NOT have a "right" to wander off-leash. Owners have a "responsibility" to ensure that their dogs do not pose a threat to people, other dogs, wildlife, and to the environment.
2. Many owners ignore posted dog restrictions. About a third of dog walkers we see on our daily walks do not keep their dogs on a leash, even when we remind them of the leash law.
3. Owners underestimate the danger their dogs pose to people, especially children. Off-leash dogs can be hazardous to strangers, even if they seem docile around people they are accustomed to.
4. Voice command restrictions are NOT an acceptable alternative to a leash because dogs may not obey voice commands when they are stressed by strangers or other dogs. On many occasions, we have seen dogs ignore their owner's commands and continue to chase wildlife--or wander about, sniffing for something to chase.

5. The "default" for all park areas should be NO DOGS ALLOWED EXCEPT IN DESIGNATED AREAS.

6. Given the horrible state of our National and State Parks funding, it is very difficult for Park staff (and even volunteers) to enforce any dog restrictions. This problem should make it even more important to allow dogs only in the safest areas.

7. The fines for violation of dog restrictions should escalate quickly after the first offense. Scofflaws will no doubt flout any restrictions; heavy fines are the only deterrent to these people.

8. Certain breeds proven dangerous to people such as pit bulls should NOT be permitted on any Park property without a leash AND muzzle. The fines for violation should be heavy, including impoundment of the dog.

9. Since the Pacific Coast is part of the migratory route of many birds, restrictions on dogs should also take into consideration the locations where these birds nest, feed, or stopover. Dogs should not be allowed in these areas.

Please do not cave in to a strident, vocal minority of people who insist on inflicting their dogs on Park visitors and property. The national and state parks are owned by ALL people; no small subgroup has a "right" to insist on special privileges.

Please adopt the strictest dog restrictions so that our parks remain as special, protected places that we can all enjoy and hand to our descendents in great condition.

Thank you for the opportunity to comment on this important Dog Plan initiative.

Bruce Mussell San Bruno CA 94066

Correspondence ID: 750 **Project:** 11759 **Document:** 38106
Received: Feb,22,2011 12:26:57
Correspondence Type: Web Form
Correspondence: I would like to comment on the dog management plan. I am particularly concerned about Chrissy Field in San Francisco. Also the other walking/biking paths throughout the Golden Gate Area. I favor restricting as large an area as possible along the coast to no dogs allowed. I found that on a recent visit that the presence of dogs was very disruptive to a normal walk along the path and very disruptive when we walked on the beach. Dogs were

everywhere and I noticed over 1/2 of them were off leashes and running in packs of 3-4 dogs. It was threatening to children and walkers along the path. Dogs were everywhere and no one was picking solid waste after their dogs. I found it to be very disgusting to be surrounded by dog feces and urine and finding dogs pushing their noses into your body. Owners seemed oblivious to the behavior of their dogs and it significantly diminished the experience of being near the bay. Any restriction that can be done to keep dogs away from these National Parks that all citizens support would be an improvement. Reading the documents the preferred alternatives seem to be as good as you can get, although I would prefer even greater restrictions (banning dogs from all National Parks).

Correspondence ID: 751 **Project:** 11759 **Document:** 38106
Received: Feb,22,2011 18:45:30
Correspondence Type: Web Form
Correspondence: I am a frequent visitor to all your parks for 55 years already!!! Keep the dog policy as it is - free roaming or on leashes. Dogs are part of our families and they pay TAXES, also. Europe is much more lenient in all those areas.....

Correspondence ID: 752 **Project:** 11759 **Document:** 38106
Received: Feb,22,2011 21:31:04
Correspondence Type: Web Form
Correspondence: The plan for Mori Point seems very inconsistent. According to the maps (which are very hard to decipher), Bootleggers Steps would be closed to dogs completely. Trails at the top of Mori Point would also be closed to dogs. I can see no reason for these restrictions. Bootleggers Steps are man made (earth moved, vegetation removed, wildlife disturbed in the process) and a dog using them would cause no additional harm. I climb those steps every weekend with my dog and closing those steps to our use would negatively impact my experience. I have lived in Pacifica for almost 30 years and have been walking Mori Point trails before they were sacred NPS trails, for the same period. I actually think I would prefer to go back to the days when you had to dodge cars and dirt bikes driving off road, they at least shared the space. Take a look around and see how many dog walkers, most of whom are locals, use Mori Point. We are the major users of the area and you are denying us the use of our backyard.

On the topic of dog waste, why don't horseback riders have to pick up their animal's waste? I run into piles of horse manure regularly and somehow, apparently, that causes no harm to vegetation, water quality or natural wildlife. I think fairness is needed here. All domestic animal waste is to be

removed by the animal's owner in NPS space.

You note that dogs barking could disturb birds and other wildlife. How about children chasing birds, digging holes, screaming loudly. Apparently that has no impact on wildlife. Spend a little time on a weekend and you will soon see the impact of children on the natural landscape. Watch gulls and other seabirds frantically fly as they get chased from area to area. And you mention dogs could trample on snakes, again, how about horses, or bikes. Apparently humans chasing wildlife, trampling vegetation, leaving trash and waste, is just the cost of doing business, but dogs are apparently the root of all evil. Have you seen the state of some of the trails due to bike use? Some of the wetter areas are almost completely eroded, with deep ruts from bike tires. Again, apparently the cost of doing business. I think you have picked the dog as your scapegoat for what you somehow believe are the problems within the GGNRA. You will find that you are mistaken, unfortunately probably not before you close every bit of GGNRA space to dog walkers.

Please change the plan for Mori Point to allow use of all trails and Bootleggers Steps to dog walkers

Correspondence ID: 753 **Project:** 11759 **Document:** 38106
Received: Feb,22,2011 22:08:32
Correspondence Type: Web Form
Correspondence: to the nps.gov:

i am highly concerned regarding the fort funston off leash laws being evaluated as well as the other open spaces currently allowing dogs either on leash or off for dog owners, walkers, and caretakers to enjoy.

fort funston is an off leash adventure dog park that i bring my personal dog, wyatt, and other clients dogs to run free in a safe environment; allowing them to run for approximately 20-45 minutes, while maintaining recall via voice control, remaining in a segregated pack, and exercising diligence,

my concerns if the park closes are as follows:

1) if the park(s) chooses to restrict off leash dog enjoyment, i foresee more dogs possibly becoming:

a) aggressive, due to lack of routine 20-45 minutes of running free, off leash. case studies show that dogs who do not get proper exercise routinely can become aggressive, anxious, hyperactive, and destructive; both to themselves, their owners, other dogs, and property (i.e. digging and other

extreme anxiety behaviours).

b) escaping from yards, (due to above mentioned)

c) excessive barking a/or (due to above mentioned)

d) excessive damage to owner's a/or (due to above mentioned)

e) affect/become neighbors problems. (due to above mentioned)

f) abnormal incoming shelter rates and animals who may be aggressive or difficult to handle a/or adopt out due to lack of exercise, socialization, and healthy group play monitored by a dog care professional a/or the owners.

g) dog owners who are unable to provide exercise for their dogs who are doing the responsible thing by paying for a service to pick up and drop off their dogs and bringing them to funston will no longer have this option available for their dogs and will have further frustrations and concerns of their dogs pent up energy. some owners may surrender their dogs in order to have a better life for their dogs, and this may result in increased shelter rates and may reverse the no kill policy at some shelters to becoming kill shelters, a/or moving the dog via transport to a kill shelter for euthanasia, resulting in an increased city, county, a/or state budget that cities, counties and the state already are lacking.

h) wildlife adjustment. deer, skunk, raccoons, rats, other rodents, feral cats, cougars, bobcats, coyotes, and even snakes may re-enter current "dog zones" due to less fear of encountering both dogs and humans. these can be represented as signs of a healthier eco-system. however, the reintroduction of wildlife can become an endangerment to park visitors and eventually become a great tragedy and loss for not only park visitors, but also for wildlife. dogs have managed to keep wildlife at "bay" in most areas of highly traffic off leash dog use areas. if the park system elects to close off specific areas to re-habilitate the ecology, wildlife will eventually re-enter these areas and may cause more problems. deer may become a hazard in areas where once there were no signs. deer may cross roads, injure motorists; resulting in fatalities, both in humans and the deer population.

cougars may encroach these new deer populated areas, resulting in more cougar sightings, accidental attacks on humans or pets (primarily small pets and small children), eventually contributing to fish and game obligated to destroy our precious california mountain lion population.

coyotes and bobcats may follow suit and become entangled in an urban wildlife management crisis that is denied in the documentation provided in the nps proposal for eco restoration and management, resulting in even more

damage to our current wildlife endangered already from urban sprawl.

being a responsible dog owner and dog care provider, i hope that fort funston and the additional nps parks will come to a compromise where both dog owners and lovers can continue to safely allow their dogs off leash, while maintaining a healthy balance in our eco systems, communities and neighborhoods.

without the off leash Privileges we currently are fortunate to experience, i fear the above mentioned concerns will occur within a 2-5 year time frame. as a tax payer, supporter of public lands, and a registered voter, i propose there be alternatives to allow the continued enjoyment of the nps areas for our dogs to run free.

alternatives:

a) implement a dog permit for professional dog walkers and maybe owners who would like to continue to walk their dogs off leash at the nps park areas. these permits can come in the form of day permits (purchased online and printable), at an nps kiosk (much like a parking validation at self service parking lots), or annually, or monthly. the east bay has an excellent dog permit program in existence.

b) implement a citation fee for dog owners not carrying the permit, exceeding dogs per person ratio, and valid dog tags (rabies) and licenses for county of residence.

c) implement a voice control recall policy based on the honor system. (dog owners watch a short video online or at a local library, nps kiosk, station, city hall portraying voice control protocols). owners watch the video, agree that their dog abides by the recall system protocol, and pays annual fee (video will have ot be watch annually before registration can be completed and fees paid) . dogs would be required to wear a voice control tag in addition to rabies and animal license or a citation, warning or actual will be given. boulder, colorado has a voice control/recall video and the program has been successful.

Correspondence ID: 754 **Project:** 11759 **Document:** 38106

Received: Feb,22,2011 22:50:40

Correspondence Type: Web Form

Correspondence: Dear Superintendent. I emigrated from Europe 25 years ago where dogs are allowed in all parks and beaches. I lived in SF ever since. I have survived the 89 Loma Prieta earthquake, divorce, 2 businesses failing, serious illness, the dot bomb and now the Great Recession, but only just. Part of my

recovery process throughout all these tragedies has been for me to walk my dogs at the beach, mostly at Baker beach but also at Fort Funston at least twice a week over the last 15 years. That is at least 2,600 visits to the GGNRA. The pleasure, exercise and stress relief I get from taking my voice-controlled dogs has literally saved my life.

For those walks which I depend upon for exercise for me and my dog, to be threatened to be taken away is horrifying for me. Once you rule that dogs can only be off leash in certain parts of the beach, or not at all, then chaos will reign. The plan has to stay at its 1979 agreement for one simple reason: human health benefits! You work for us, the American taxpayer, we pay taxes, we vote and we can ask for and get access to OUR public lands with OUR (trained) best friends. The off leash areas only represents 1% of the entire GGNRA and the people who are pushing for the restrictions have no understanding of what these restrictions will do to certain people, including me.

Also, the Compliance Based Management Strategy is BLATANTLY unfair and remains a nuclear weapon in your arsenal. Certainly punish those dog owners who flout the law and who do not clean up after their dogs, but to ban ALL dogs after conceivably just one incident, is unconscionable. Maybe in the Soviet Union, but not in America sir.

Furthermore, the Preferred Alternative severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA. There is no off-leash access in San Mateo County in the Preferred Alternative and that must be changed.

Lastly, I believe the DEIS does not adequately address the environmental and social impact of forcing large numbers of people and dogs into much smaller areas. Reducing the amount of area available for off-leash will significantly degrade the park experience for people with dogs. It will increase conflicts. Even more importantly, the DEIS does not address the environmental and social impact on small, neighborhood parks in cities like San Francisco next to the GGNRA. That is why I have written and telephoned my District Supervisor Mark Farrell and will be cc'ing him and Senators Boxer and Congresswoman Pelosi.

Please do NOT turn us into a Middle East dictatorship!

Andy Norway District 2 San Francisco

cc: Mark Farrell. Senator Boxer Congresswoman Pelosi

Correspondence ID: 755 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 09:37:01
Correspondence Type: Web Form
Correspondence: I agree with the options chosen for Milo and Milagra Ridges. This is where I dog walk and I always keep my dog on leash. Thank you for keeping the areas open for dogs and I believe in these areas that on leash is best. Thank you.

Correspondence ID: 756 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear GGNRA members

Thank you for the opportunity to comment on the GGNRA Dog Management Plan as it relates to the Rancho Corral de Tierra property in Montara.

I am a member of the Montara Dog Group and I strongly oppose the plan to ban all dogs from Rancho Corral. The GGNRA's current plan is unreasonable and unjust and will have a significant negative impact on my family's quality of life.

My family currently uses Ranch Corral to walk our Labrador Retrievers. We walk there at least twice a day and sometimes more. We generally walk our dogs off leash in Rancho as they are on voice and hand command, however, we always have their leashes in hand and either put them on or make them sit/stay should we approach people who have dogs on leash, a cyclist, a horse, etc. As unbelievable as it may seem everyone that uses the area shows the same respect ? it is a truly unique community in that sense.

We have been using Rancho Corral to walk our dogs for close to 4 years. During this entire time the people who use this land with us - either to walk their dogs, ride their horses, cycle or just go for a walk ? have gotten along swimmingly. We have all been respectful of each others use of the land and of the land itself. Certainly as a community we have come together and have done what needed to be done in order to ensure we respect the beautiful land of Rancho Corral as well as to ensure that all those who use it respect each other. The waste can management (for which my husband is one of the volunteers) is one of the many actions the dog community has taken.

Use of the open space is critical to the health and well being of my dogs and my family ? small backyards which are common in CA are prohibitive to exercise and walking on the street doesn't provide the same amount of exercise, pleasure or safety measures for the dogs or the people walking the dogs. Rancho Corral provides the perfect opportunity for dogs and their owners to get the exercise they need in a safe environment. It also allows for social interaction for owners and their dogs which is critical to the mental well being of both. We have met such wonderful people and neighbors through walking our dogs at Rancho which has enhanced our day to day living and allowed us to feel safe and secure in our community. All of this is truly invaluable.

To not allow dogs in Ranch Corral is preposterous - GGNRA absolutely needs to be respectful of the residents in an around Montara that have used this land for 50 plus years with respect for the land and each other and with little or no incident. I imagine it would be more then difficult to find a community that has banded together with such vigor and success. My family specifically moved to Montara for access to this green space so removing my right to enjoy it as I do now is unreasonable and prejudiced. Additionally, although before my time, I know that the community historically fought to preserve the land and defeat planned developments and freeways in order to allow the enjoyment that people and dogs have there today. If it were not for the community's passion, efforts and success it might be that there would be a Rancho Corral today.

Furthermore GGRNA's proposal to ban all dogs from the land does not show equitable treatment as dogs are permitted on other GGNRA lands ? some of which endorse leash free activity. In addition the GGNRA's process for planning land use for Rancho Corral has not been forthright ? there was one local meeting to discuss the proposal and it is quite evident from the GGNRA's current plan that the multitude of feedback provided by attendees at that meeting as it relates to dog walking was not acknowledged ? basically a lip service was provided by GGNRA to the local residents.

I am requesting that the GGNRA implement Alternative E for Rancho Corral. The community has supported a scenario similar to Alternative E for countless years proving that it is a successful model - so not only is there no reason to change it, changing it is immoderate.

Regards, Brenna Turner Resident of Montara CA

Correspondence ID: 757 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Web Form

Correspondence: Dear GGNRA members

Thank you for the opportunity to comment on the GGNRA Dog Management Plan as it relates to the Rancho Corral de Tierra property in Montara.

I am a member of the Montara Dog Group and I strongly oppose the plan to ban all dogs from Rancho Corral. The GGNRA's current plan is unreasonable and unjust and will have a significant negative impact on my family's quality of life.

My family currently uses Ranch Corral to walk our Labrador Retrievers. We walk there at least twice a day and sometimes more. We generally walk our dogs off leash in Rancho as they are on voice and hand command, however, we always have their leashes in hand and either put them on or make them sit/stay should we approach people who have dogs on leash, a cyclist, a horse, etc. As unbelievable as it may seem everyone that uses the area shows the same respect ? it is a truly unique community in that sense.

We have been using Rancho Corral to walk our dogs for close to 4 years. During this entire time the people who use this land with us - either to walk their dogs, ride their horses, cycle or just go for a walk ? have gotten along swimmingly. We have all been respectful of each others use of the land and of the land itself. Certainly as a community we have come together and have done what needed to be done in order to ensure we respect the beautiful land of Rancho Corral as well as to ensure that all those who use it respect each other. The waste can management (which I volunteer to maintain) is one of the many actions the dog community has taken.

Use of the open space is critical to the health and well being of my dogs and my family ? small backyards which are common in CA are prohibitive to exercise and walking on the street doesn't provide the same amount of exercise, pleasure or safety measures for the dogs or the people walking the dogs. Rancho Corral provides the perfect opportunity for dogs and their owners to get the exercise they need in a safe environment. It also allows for social interaction for owners and their dogs which is critical to the mental well being of both. We have met such wonderful people and neighbors through walking our dogs at Rancho which has enhanced our day to day living and allowed us to feel safe and secure in our community. All of this is truly invaluable.

To not allow dogs in Ranch Corral is preposterous - GGNRA absolutely needs to be respectful of the residents in an around Montara that have used this land for 50 plus years with respect for the land and each other and with little or no incident. I imagine it would be more then difficult to find a community that has banded together with such vigor and success. My family

specifically moved to Montara for access to this green space so removing my right to enjoy it as I do now is unreasonable and prejudiced. Additionally, although before my time, I know that the community historically fought to preserve the land and defeat planned developments and freeways in order to allow the enjoyment that people and dogs have there today. If it were not for the community's passion, efforts and success it might be that there would be a Rancho Corral today.

Furthermore GGRNA's proposal to ban all dogs from the land does not show equitable treatment as dogs are permitted on other GGNRA lands ? some of which endorse leash free activity. In addition the GGNRA's process for planning land use for Rancho Corral has not been forthright ? there was one local meeting to discuss the proposal and it is quite evident from the GGNRA's current plan that the multitude of feedback provided by attendees at that meeting as it relates to dog walking was not acknowledged ? basically a lip service was provided by GGNRA to the local residents.

I am requesting that the GGNRA implement Alternative E for Rancho Corral. The community has supported a scenario similar to Alternative E for countless years proving that it is a successful model - so not only is there no reason to change it, changing it is immoderate.

Regards, Paul Turner Resident of Montara CA

Correspondence ID: 758 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 11:44:30
Correspondence Type: Web Form
Correspondence: My comments concern Chrissy Field, an area I frequently enjoy walking and bringing visitors. It is a special place because it offers a mix of natural beauty, easy accessability and the pleasure of watching people and dogs enjoying all the activities this area offers. Although I do not have a dog myself, part of the pleasure of Chrissy Field is watching a wonderful variety dogs happily play on the beach and in the water. I understand the necessity of a leash regulation on the paths. It appears to be generally complied with. However, it would be an unnecessary restriction to inforce leash laws on the beach. Up until now, families and dogs have happily co-existed here and the quality of enjoyment would be considerably diminished if that priviledge would be restricted. Thank you for your consideration.

Correspondence ID: 759 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 13:14:28
Correspondence Type: Web Form

Correspondence: It was disheartening to hear that GGNRA plans to remove what is already such minimal space that is available for off leash dog walking in the Bay Area, Fort Funston in particular. I am not a San Francisco resident. However, I often make the drive out there so that I can provide THE BEST outlet for my dog to run free because there is NO other off leash dog walking area like Funston in the Bay Area. It's actually one thing that impresses me about the City of SF. I don't live in a major city and the dog parks we have are small, fenced off dirt areas. Funston has sand dunes that dogs can run and roll around in. There are trails that allow for a hiking experience. A lot of my friends even come from the East Bay (Fremont, Hayward, Oakland, etc.) on a regular basis because they don't have an area like Funston either. The other day I met dog owners who came all the way from Santa Cruz, and they are regulars. It's their weekend trip! I've been going to Funston for the last couple years with my dog and it's always been such a peaceful, relaxing and fun experience. It is truly a special place, and not only for dogs but for bikers, hikers, and children.

My uncle used to bring my cousins and me to Funston when I was young (when our family didn't have dogs). This was back when the bunkers weren't boarded up yet and people could still walk through them. The environment was NOTHING like the way it is now. It used to be so much dirtier and a lot of homeless people walking around and camping in the bunkers. Drug dealers did their business in plain view. It definitely was not as safe as it is now. I clearly remember my uncle telling my cousins and me, "I do not want you guys coming here unless you are with an adult!" So I was pleasantly surprised when I returned to Funston with my dog as an adult.

I was hesitant when my friend told me that it's the best off leash dog walking place. In my head, I was only remembering how unsafe it used to be. But when I arrived and saw all the dogs running free and people socializing and having a good time, I fell in love with the place! I was amazed how clean it was, not just garbage, but of dog waste. I was expecting dog waste to be everywhere but it wasn't. Dog walkers/owners at Funston are VERY responsible. It has been very rare in these past few years I've been going to see a walker not pick up after the dog. And if they don't, someone will make it noticed to the owner and provide a bag for cleanup. I know that dog owners and dog groups in the area often do their part and organize volunteer clean up days at Funston. I am very impressed about how clean dog owners/walkers have kept the park!

I agree that it's very important to keep our land clean and preserve land and animals that are truly endangered! However, it's not solely dogs that "litter and damage the parks." Humans are the biggest culprits. It's the human that doesn't clean up after dogs and humans climb and trample through restricted areas too! Just the other day at Funston, there was a female walking WITHOUT a dog but she wasn't on the pavement or the trails. She was

walking through a roped off area. She wasn't even trying to go after a dog, just walking through the plants. So does that mean GGNRA is eventually going to stop humans from attending the parks? I highly doubt that would happen.

The barriers that GGNRA have put up at Funston to block off land/plants for preservation are highly ineffective. They are basically wooden posts with rope. Often, these posts and ropes are buried in sand because of the constant changing and windy weather. And the ropes will not prevent dogs and humans from crossing them (just like the lady I mentioned earlier). I feel GGNRA should put a little more effort and funding into more effective barriers if they are truly concerned about preserving plant life.

GGNRA has stated that dog barking effects the "soundscapes" of Funston. Honestly, considering the number of dogs at Funston at a given time, there is hardly any barking at all. I hear more of the highway traffic off the Great Highway and Skyline Boulevard than I do dog barks! Not to mention the TWO shooting ranges (SFPD and skeet) across the street at Lake Merced. Constant gunshots are going off every time I'm at Funston. Is GGNRA going to propose moving those two ranges? They should if they are arguing that the soundscapes are being disturbed and need to be preserved. Last week on two different days, SFPD and Bomb Squad had to detonate things at the beach. I heard AND felt the explosion. That sure affects the soundscapes. And not to mention the loud, low-flying news helicopter!!

How about the hang gliders, parachuters and horses? Hang gliders and parachuters fly low. Doesn't that affect the birds and animals living there? I don't see many horse riders at Funston but I know there are horse trails open to them. I know for a fact that horses do go through the area though because I will find HUGE PILES of horse waste sitting on the floor. Horse riders don't clean up after their horses, so what is GGNRA plan on doing about that?

This proposal would take away a great thing from dogs with responsible owners. Yes, there are fenced in dog runs but they're often too small and too dirty. I honestly believe that most dog owners who take their dogs to these types of places can't control their dogs. That's why they have to be in a fenced off or enclosed area. I feel that my dog is a lot safer and better off at Funston! And I do believe that the irresponsible off leash owners will flock to numerous other parks in the city and possibly cause disturbances there if we take away the current off leash parks. If Funston and other GGNRA off leash dog walking areas remain open and available, it will help prevent future problems in areas where off leash dog walking is not allowed! I truly hope and wish that this proposal that GGNRA came up with will not go through because I can foresee much greater problems and issues than what

we have now!

It's going to be a difficult task to preserve anything and everything and satisfy everyone and everything at the same time. I hope there will be a day where humans, animals and plant life can coexist without having things being taken away from one of them.

Correspondence ID: 760 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 13:28:37
Correspondence Type: Web Form
Correspondence: Thank you for working so hard to provide safe, clean and conflict free usage of our beautiful trails. Marin County is home to thousands of dogs, owners and animal lovers and there must be some spaces to take dogs on trails. I strongly support measures to keep dogs allowed on trails but enforce better clean-up of poop!! I live close to the Oakwood Trail. I believe the use of the trail by a large amount of dog walkers with multiple dogs puts a strain on the trails. Walkers with more than 3 dogs often have more dogs than can reasonably be safe under voice control. They are not as focused on the individual animals and may leave feces on the trail as well. These large packs are often threatening to other dogs with owners and cause concern to walkers with children or walkers seeking a quiet time on the trail. Please keep off-leash/voice control permitted but potentially enforce a dog/person ratio rule. THANK YOU for offering your time on this matter and taking comments!!

Correspondence ID: 761 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 14:34:06
Correspondence Type: Web Form
Correspondence: Please help preserve off leash and dog-walking access in local recreation areas. There are too few places already. Please vote to help to preserve the historical existence of recreational uses for dogs. Thank you.

Correspondence ID: 762 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 14:53:09
Correspondence Type: Web Form
Correspondence: My dog and I were out walking the Miwok trail this morning. I have always been upset that a lot of the trails were restricted to equestrians. I feel this is so unfair, instead of reducing these restrictions you are planning to increase them. I would like to share some observations.

1\ Mount Tam just announced that they had an increase in the amount of bird life. The MMWD has the most lenient dog walking rules and this has not hurt the wild life in any way.

2\ Most dog owners are polite and take care of their dogs. I am sure there are a few who are not, I can't remember running into any. I have run into a few ruse bikers and horse riders. None of these groups should be banned due to a few bad apples.

3\ It is fun to go up early into the wilderness. I would however not feel safe out there without my dog. I don't think he would do anything if I was attacked but would be attackers don't know this.

4\ Roosevelt started the public park system during the great depression. We are once again in a time of hard economic times. Depriving people of the rejuvenating feel of the open space now just seems so wrong.

5\ Taking my children out into nature has built there love of open spaces. If you restrict who may participate in these spaces you will hamper me in passing this love onto my grandchildren.

6\The majority of open space users I see (I hike a lot in the Marin headlands, Crissy fields and Stinson Beach)are dog walking hikers. Equestrians leave large piles of manure in the middle of trails, deep hoof prints when it is wet, bikers leave large rutts in the trails. Dogs tread lightly.

Please don't take this away from us and the dogs we love.

Karen

Correspondence ID: 763 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 15:07:16
Correspondence Type: Web Form
Correspondence: Please continue to allow off-leash dog walking in the GGNRA. I wholeheartedly support requiring dog owners to clean up after their pets and keep their pets under voice control. However, I don't believe dogs should be required to be on leash, especially at Fort Funston and Crissy Field. 99% of dog owners are completely responsible. Dogs need to be able to run free for their health and exercise. There is very little space to do this in SF. Thanks.

Correspondence ID: 764 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: I just returned from walking on Crissy Field - and saw 4 packs of dogs, ostensibly with a dog walker, but running free without leads. One pack had 6 large dogs. There is no way one person in charge of six dogs running free on the beach can be able to keep her eyes on each dog all the time and make sure all faeces are collected. This is a public health nuisance - quite apart from the random behavior of the dogs intimidating small children and those of us who are wary of dogs. Unleashed dogs run freely over picnic blankets, through sandcastle construction, after the balls of children playing.

Dogs should, ideally, have places to run freely, but their presence on Crissy Field contradicts the tremendous job done in the last 2 decades of returning the edge of the Bay to more natural conditions. Unleashed dogs do not fit with the environmental thrust of reclaiming the habitat.

Correspondence ID: 765 **Project:** 11759 **Document:** 38106

Received: Feb,23,2011 19:29:55

Correspondence Type: Web Form

Correspondence: Please please allow us to run our dogs in spaces other than designated dog parks! Don't take these areas away - we NEED them!

Correspondence ID: 766 **Project:** 11759 **Document:** 38106

Received: Feb,23,2011 22:16:59

Correspondence Type: Web Form

Correspondence: Please, please, please do not move forward with the preferred alternatives.

I am a reasonably new dog owner, having adopted my yellow lab in October 2009, but a lifelong dog lover. As I read through the summary of considered and preferred alternatives, I couldn't help but feel sad -- sad for myself and my dog, of course, but also for my children, who get so much joy out of running down Muir Beach or Chrissy Field with our dog while throwing a ball to her, and out of hiking on the Oakwood loop near our house in Mill Valley. It also made me feel sad for the tens of thousands of responsible dog owners and walkers whose daily lives and options for where to take their dogs will be severely impacted if the preferred alternatives are implemented.

I know that many people have put a great deal of time and thought into evaluating the alternatives, which I do appreciate. I also certainly don't approve of dogs threatening children or wildlife or any other creatures who cannot defend themselves. However, as a responsible dog owner who keeps my dog on leash or under voice control, picks up after my dog, doesn't let

my dog wander or chase birds, etc., I feel that the preferred alternatives selected are unduly and overly restrictive. My understanding is that dogs are currently only allowed on 1% of GGNRA land and that this will significantly reduce the areas where dogs are allowed at all and almost eliminate areas where dogs are allowed to play off leash. In my opinion this is tragic and unnecessary. My hope is that if changes do in fact need to be made (and I'm not sure they do) that alternatives closer to A or E can be re-examined. As a side note, I do wonder, whether other alternatives, such as allowing dogs off-leash at certain times or on certain days were considered.

Thanks for the opportunity to comment. I truly hope you will reconsider the preferred alternatives - for me and for many of the dog lovers I know they are really not alternatives at all.

Sincerely,

Julie Smith

Correspondence ID: 767 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 22:34:16
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to submit comments

My family has a 15 year old dog. He is a member of our family and should have the opportunity to visit beaches and park as long as he is meeting the rules. We live near Muir Beach- he has been going to this beach for over 11 years. Our community- the USA consist of all peoples and their pets. To restrict pets from all public areas and beaches is wrong and I am sorry the GGNRA which I have support in many, many ways my past 20 years in SF and Marin is purposing such an unrealistic measure!

I request that dogs be permitted on beaches - at tide level off leash and on leash at all other currently permitted areas!

Thank you,

Correspondence ID: 768 **Project:** 11759 **Document:** 38106
Received: Feb,24,2011 00:00:00
Correspondence Type: Web Form
Correspondence: As concerned citizens, we oppose the dog ban on Muir Beach for reasons outlined on our website: www.keepmuirbeachdogfriendly.com We would like to better understand why this preferred alternative takes such a radical

departure from the historically dog-friendly status of Muir Beach. Is it new environmental concerns? Concerns over non dog owners? We feel that, by enforcing existing rules for ALL visitors, the best interests of everyone could be served.

Correspondence ID: 769 **Project:** 11759 **Document:** 38106
Received: Feb,24,2011 14:52:32
Correspondence Type: Web Form
Correspondence: I am very disappointed that the GGNRA wants to severely limit off leach dog walk areas. Dogs need to run to stay healthy and happy. These parks are Federal so everyone should be able to enjoy. The majority of Dog owners do pick up their dog's poop. Fort Funston has a group that actually has volunteers who pick up missed poop in the park. If you limit the areas you are talking about it will put more of a strain on other parks. The majority of time I walk my dogs at Fort Funston and everyone gets along and enjoys the walks. If we can't continue to walk our dogs in the same areas the dog owners will have decreased activity and start gaining weight! We already have an obesity problem. The park would be empty if it wasn't used by the dogs and their companions. There has to be other solutions but to take away from the free space we now have to enjoy with our dogs.

Correspondence ID: 770 **Project:** 11759 **Document:** 38106
Received: Feb,24,2011 15:32:07
Correspondence Type: Web Form
Correspondence: I am deeply disappointed in the proposed plan to restrict the use of our public parks and beaches. I pay my real estate taxes and am a responsible dog owner. Many of the proposed plans are not realistic. Dogs require safe spaces to run and be exercised. I agree that dog owners should be responsible and clean up after their animals, however, restricting dogs to confined spaces close to parking lots puts there welfare at greater risk. Part of the reason I live in Marin is to enjoy our parks and recreation areas with my dog. It is important for both of our health and welfare to be able to enjoy the outdoors, exercise, and enjoy the beauty of the area we live in. I do not have children, yet my tax dollars go to the upkeep and improvement of the schools in Mill Valley and the County. It is only appropriate that I be able to use our National Parks and beaches for recreation with my dog.

Correspondence ID: 771 **Project:** 11759 **Document:** 38106
Received: Feb,24,2011 15:56:57
Correspondence Type: Web Form

Correspondence: 2/24/11 RE: GGNRA Proposed Dog Management Plan Dear NPS,

First, I want to thank you for the thorough and informative treatment of this important issue. My comments will be limited to plans affecting the South Rodeo Beach area. As a resident of San Francisco and then Berkeley since 1963, I have visited this cove on countless occasions as a beach goer, fisherman, hiker and dog owner. One of the cove's main attractions for me has been its secluded location, accessible only by a medium difficult trail from behind, and only at low tide from Rodeo Beach proper. This seclusion offers ideal conditions for dogs to play and swim as the human population is never very great, and the cove is small, allowing visual and voice contact with dogs from any place and to any place on the beach. Also, dogs are not as tempted to harass the birdlife because the birds found there are mostly in the water; the beach is steep and wading birds do not find it useful for feeding as they do on a broad shallow shingle such as Rodeo or Muir beaches. All in all, I have found this to be one of the most dog-friendly places in the entire bay area, and certainly the best beach.

I am concerned, therefore, as to the reasons for further restricting dogs in this particular portion of the GGNRA. It appears that a great deal of thought has been devoted to other areas, and there has been a lot of public input over the issues of places like Chrissy Field and Fort Funston. But I don't see why South Rodeo Beach, possibly the least visited of all the sites, should have been included in the plans to increase dog management. If there are specific reasons behind this part of the plan, I might look favorably on a change of rules, but I have not seen any mentioned.

In conclusion, my request is that you consider treating South Rodeo Beach the same way you would other voice-controlled areas in the plan.

Thank you,

Peter Smalley

Correspondence ID: 772 **Project:** 11759 **Document:** 38106

Received: Feb,24,2011 16:50:27

Correspondence Type: Web Form

Correspondence: I am both a park service volunteer and a dog owner. As such, I am sensitive to the environmental impacts of both people and dogs and the responsibility to keep my pet out of restricted areas and off the berms. I pick up not only bits of plastic and styrofoam, cigarette butts, abandoned toys, miscellaneous trash but also pet droppings from my own dog as well as others while on my walks and on my volunteer work days. Although we have walked several trails in the GGNRA, we walk every day on the east end of Crissy Field,

along the promenade and on Central Beach.

I must commend the Draft for being comprehensive and for the efforts to take into account the various areas and different needs of the numerous areas affected. However, I do believe that some of the recommendations of the Plan are naively conceived, to wit: - early in the morning, except for a sanctioned triathlon or the like, I have never seen anyone using East Beach other than those with dogs. I would guess that before 9:00 a.m. there are no beach-goers and that dogs off-leash would not intimidate anyone. I do agree that attempting to sun or play in the sand would be difficult with dogs running around, but before and after certain hours would be a more reasonable control to accommodate those who do not want to have dogs around. - a designation "east of the eastern-most path and west of the western-most path" on Chrissy Field is silly and to my mind hardly the clearly designated areas to which park personnel can refer people. Are those who are dog-adverse really going to use the small areas designated as dog-free? The field is a large open space and most dogs don't stop when a paved path crosses their running area. I can only imagine that this delimitation is designed to aggravate enforcement personnel, those who are afraid of dogs and pet owners alike. - a word about enforcement. The compliance-based management strategy is by definition too vague. How will the total number of dogs be determined without some kind of license or permit that also designates how often the dog uses the area? Most of the time I am exercising, I never see park personnel. If I walk my dog daily for an hour along the promenade and some out-of-town visitor has their dog off-leash in the same area, will that count as 1 violation out of 8 "dog uses", will it be 50% of the dogs on the path at that time, or will there be some accommodation for the length of time I have been in compliance and the de minimus time the visitor is not compliant? And for those who object to dogs being in the space they feel should be dog free (but has been designated ROLA), will there be an easing of restrictions if there is less than 75% compliance with the dog-adverse being in a ROLA area?

I have read the letters from tourists who want to experience the beauty of this area without dogs. On some level, I can appreciate that accommodating the dog-adverse who will be positively impacted by all of the plans except A over the pet-owner who is minimally adversely impacted by all plans except A may be a good idea. But, will those who object to dogs on-leash coming up suddenly around the bend of a narrow trail, or off-leash in the middle of Chrissy Field be cited for not being in a dog-free area? I hope that as much effort goes into educating the dog-adverse to their advantage as to compliance of pet-owners with the new restrictions.

Correspondence ID: 773 **Project:** 11759 **Document:** 38106
Received: Feb,24,2011 17:51:47

Correspondence Web Form

Type:

Correspondence: My wife and I are frequent users of the Crissy Field area since it is near our home, and although we no longer have a dog, we do occasionally have our daughter's dog accompany us on our visits to Crissy Field. Although I do appreciate the potential need to separate dogs from some areas, given the usage in the area during the week, I don't believe that you need to adopt an absolute no-dog zone for the East Beach area. It is a very convenient spot for us to park and we have not observed a problem between dogs and people, even with small children using this area, especially during off-peak usage periods. I suggest that if there has to be a no-dog area, that you limit the period to the weekends and holidays, during the peak hours periods - perhaps from 10:00 am to 4:00 pm.

Correspondence ID: 774 **Project:** 11759 **Document:** 38106

Received: Feb,24,2011 17:55:37

Correspondence Web Form

Type:

Correspondence: I wish to support the DEIS alternative of increased restriction for dogs within the GGNRA, both on and off leash. As a birder/naturalist using the GGNRA since its inception in the 70s I have witnessed an explosion of off-leash dogs on trails, particularly within Marin County. The shortage of rangers to enforce leash laws, coupled with the staggering increase in recreational hikers with dogs has led to a dramatic decrease in abundance of birds within the GGNRA as measured by national audubon's christmas bird count numbers, and personal records. The specter of dogs running freely through the underbrush has resulted in a "bird-free zone" within at least 40' of most trails. It is rare to see a dog actually on leash. The usual sight is a dog running free, with the owner carrying a leash in-hand. Tennessee Valley trails are particularly abused, with owners claiming not to see the signs, or saying of their dogs "they never catch the birds". Harrassment of birds during any season disrupts feeding, breeding, and resting behavior, and deprives them of habitat critical to maintain population numbers critical to a diverse avi-fauna. Rocky Mountain National Park has resorted to volunteers with radios and cell phones stationed near entrances to turn back scoff-law pet owners. While I empathize with pet owners over the shortage of space to recreate with their dogs, they must understand the consequences of inappropriate use, and create alternative dog runs in space intended for that use. John Comstock

Correspondence ID: 775 **Project:** 11759 **Document:** 38106

Received: Feb,24,2011 18:22:09

Correspondence Web Form

Type:

Correspondence: I support the Preferred Alternative for Muir Beach, i.e. dogs on leash in parking area, dogs prohibited on beach and wildlife recovery areas.

Correspondence ID: 776 **Project:** 11759 **Document:** 38106

Received: Feb,24,2011 20:19:41

Correspondence Type: Web Form

Correspondence: I submit that residents should be allowed to have dogs off leash.

We'll deal with this issue when and if it becomes a problem, after all the really serious problems in life.

Correspondence ID: 777 **Project:** 11759 **Document:** 38106

Received: Feb,25,2011 10:50:16

Correspondence Type: Web Form

Correspondence: I think that existing regulations regarding dog walking are already overly restrictive. I don't want to see additional constraints on this activity.

Correspondence ID: 778 **Project:** 11759 **Document:** 38106

Received: Feb,25,2011 11:06:35

Correspondence Type: Web Form

Correspondence: I completely oppose the changes that either require dogs to be leashed or prohibited from being on public lands. With open space, beaches, parks and trails being overly restrictive already for dog owners/dogs, if this is allowed to pass it will only get more restrictive and before you know it, we won't even be able to walk our dogs down public sidewalks! Seriously! Pet ownership should be encouraged as a way of removing feral cats and dogs from our communities, showing a little heart, and helping the economy. Therefore, as conscientious as we are about our dogs public behavior and our clean up habits, the few loud voices that want EVERYTHING their way are winning the battle and dogs will be banned nearly everywhere if we dog owners don't voice our objection to such restrictive ordinances. Shame on you if you capitulate. Sincerely, Diane

Correspondence ID: 779 **Project:** 11759 **Document:** 38106

Received: Feb,25,2011 12:23:47

Correspondence Type: Web Form

Correspondence: Dog policy within GGNRA is in critical need of revision, and enforcement. Inevitable small percentage of scofflaw dog owners (majority obey rules)

has resulted in: --Reduction in diversity of birds and other animals seen by naturalists. For example, see Peter Banks; Biology Letters, Dec, 22, 2007 3(6) 611-613, documenting up to 40% measured reduction in birds along trails used by dogs. --On daily nature walks, I have personally noted a reduction in threatened, endangered, and special status species within Marin Headlands, and Oakwood valley trails. Species of concern are ground dwelling birds (California Quail, California Towhee, Fox Sparrow, Swamp Sparrow, Virginia Rail, as well as species requiring secluded habitat and specialized cover, such as Long-eared Owl and Rufous-Crowned sparrow. -- Along upper reaches of Alta trail professional dog walkers are seriously disturbing habitat of Mission Blue Butterfly by allowing dogs to roam freely. --In areas signed for "Dogs on Leash" the majority of owners simply carry a leash to deploy should they spot a ranger. When reminded of the rule, many are hostile, or simply say "Yeah, right..." indicating scorn for any vestige of enforcement. --Rocky Mountain National Park currently employs volunteer "rangers" with cell phones and/or walkie talkies to inform non-compliant dog owners of the law, and to call in a ranger for a citation if they do not turn back. --At Tennessee Valley beach, where I lead the Christmas Bird count for Southern Marin Audubon, I see several dogs being walked on or off leash despite the new large "No Pet" signs. The culture of disobeying the signs seems to have become the common practice among this minority of scofflaw owners. --I urge that an increased level of restriction be adopted, and ENFORCED by the method used in Rocky Mt. NP, realizing that ranger resources are stretched thin. Sincerely John Comstock

Correspondence ID: 780 **Project:** 11759 **Document:** 38106

Received: Feb,25,2011 14:35:54

Correspondence Type: Web Form

Correspondence: My name is Mike Greenfield. I am longtime resident of the Bay Area who currently resides in the Outer Sunset. I am a committed environmentalist, attorney with a background in environmental law, former Park Ranger/Naturalist at Sequoia National Park, and am an avid supporter of policies designed to protect the natural environment. Being a surfer and a dog owner, I typically visit Ocean Beach and/or the area surrounding Land's End several times a week, which I believe may perhaps provide me a sound perspective from which to address issues pertaining to the USNPS's misguided management proposals for the GGNRA. In short, the proposed restrictions regarding where dogs shall be allowed within the GGNRA are ill-conceived and absurd. From the onset, the NPS has had a very clear notion of precisely the sort of policy that it wished to implement and since assuming management of the areas in question, has been doggedly (no pun intended) working backwards in an extremely transparent attempt to discover a sound basis for the policies that it had already agreed to adopt without first doing the necessary due diligence. As a result, this process has

now become a sham, since the policy was decided at the onset and as with most things the NPS does, no amount of logic is bound to get in the way of these policies being implemented. As I understand it, the stated rationale for essentially banning dogs throughout the GGNRA is: 1. The enact a deleterious impact upon the environment; 2. Their presence is unwanted and unappreciated by visitors to the area that do not like dogs; and 3. Because this is simply the policy that the NPS has adopted and implemented in all of the other mismanaged properties that it has been charged with administering. I will now address each of these points in order.

There is absolutely no question that dogs do exact an impact upon any environment and most certainly upon that which exists within the GGNRA. Everything in this world presents an impact upon the environment. The question however is what the impact is and how great is the degree of harm that this impact represents. This is precisely where the reasoning behind the NPS's proposals lack cogency. While it is impossible to state what the actual impact of dogs may be (since there exists no credible data upon which any such statements could rely), it is nevertheless remains an absolutely incontrovertible fact that humans have and continue to present an infinitely greater negative impact upon the environment than do dogs. I find it astounding that while the adverse impact of dog's is routinely touted as an accepted basis upon which to deny virtually all off-leash privileges within the GGNRA (and other areas), there is nary even the slightest bit of actual evidence offered in support of these claims. The proverbial "elephant in the room" is that NO empirical evidence in support the predetermined findings and/or claims regarding the environmental impact posed by off-leash dogs actually exists. This statement applies equally to proffered necessity of banning dogs in order to protect and assist in the recovery of the endangered snowy plover populations. Again there exists no empirical evidence to support the assertions that dogs pose any legitimate threat to the future existence of this or any other species existing within the GGNRA. Claims of the snowy plover's demise being in any way tied to the activities of off-leash dogs are both disingenuous, spurious and completely overstated to say the least. It has long been settled that the compromised status of this species is attributable to anthropogenic habitat destruction. The widespread decimation of sand dunes, estuaries and other wetland systems (all of which are critical to the propagation of the snowy plover), represents the long established cause of the species' currently low population numbers. Sand Dunes have been paved over and trampled; and wetlands drained, filled, paved over and otherwise destroyed not by dogs, but by humans, which are interestingly allowed unrestricted access to all remaining critical habitat. In my numerous ventures within the GGNRA I have on multiple occasions witnessed the presence of both foxes and coyotes within the littoral zone. I am aware of no plans to limit their access within the GGNRA, nor to limit access to raccoons, skunks, crows and seagulls, all of which exist within the immediate area and are known to consume eggs as part of their natural diet.

I suspect that there are no efforts being made to eradicate these species from the area because the threat that these natural predators may present to threatened plover populations (and other species) is considered to be nominal at most. So then, I wonder how it is that domesticated dogs, which generally lack the ability to constructively harness their natural foraging instincts are presumed to present such a significant threat to this environment, when all of these natural born killers are presumably non-issues. Furthermore, if not for the widespread destruction of coastal environment by humans, the numbers of all these species (save the crows, whose numbers have been unnaturally enhanced by the existence of human fodder) would exist in far greater numbers than they do at present. I mention this to point out that the plovers have always had to deal with a certain degree of stress and mortality at the hands of natural predators, which in turn helped to ensure that the population remained strong. This is not to insinuate that humans and their dogs should go out of their way to harass the birds in an effort to assume this role, but rather merely to mention that they have evolved in a manner which allows them to survive such non-threats. Again, the plover's threatened status is a product of habit destruction, NOT from dogs. In a society that has long been governed by forces that have adamantly opposed any application of the precautionary principle, we are now being asked (by a branch of this government no less) to accept that the NPS's rationale for eliminating the existence of off-leash dog sites is principally tied to the imagined potential of dogs to harm the environment. In other words, since it is currently impossible to say what harm dogs may present, the NPS has determined that it is necessary to eliminate dogs as to ensure that they cannot pose any harm, real or imagined. Mind you, there are again no such limitations being imposed to restrict the access of what is unquestionably the world's most destructive species: humans. Of course the reality is that all of these stated justifications for banning dogs are nothing more than a pretext for doing what the NPS had long since decided that it was going to do: eliminate all off-leash zones within the GGNRA. As to the concern over dog feces being left on the beach by irresponsible dog owners that fail to clean up after their pets, while it is an unfortunate fact that there do exist some idiots that presumably find it acceptable to leave their dogs crap, in my experience they represent an overwhelming exception rather than the rule. The vast majority of dog owners that visit the GGNRA with their pets are extremely conscientious about cleaning up after their dogs. I do not possess any data on matter, however I would confidently insist that the percentage of dog owners leaving crap on the beach is extremely small in comparison to the non-dog owners who visit the beach and depart without cleaning after themselves, leaving a trail of litter in their wake. I will discuss this issue in further below. In short, all claims regarding the environmental impact of dogs in the GGNRA are overblown and have been based on little more than conjecture and the otherwise unsupported opinions that together form a rather tenuous basis upon which to base the enactment of policies that will ultimately affect the people who most often use the areas in

question in a decidedly detrimental fashion. In terms of prohibiting off-leash dogs in the GGNRA on account of wishing to respect the interests of those visitors that do not like dogs and do not wish to encounter them within the area, I am confused as to why this minority interest should supersede that of the majority. Ocean Beach stands out as one of only a few public beaches in the entire state that do allow dogs to roam off-leash, which means that those not wishing to encounter dogs have numerous alternatives to visiting Ocean Beach, whereas the same cannot be said for dog owners, who have no other options for letting their dogs run freely and get the exercise they need (Note: fenced in off-leash dog park (crap piles), do not provide either the space or the terrain required). I am at the beach nearly every day, regardless of the weather, which incidentally, is usually pretty lousy in terms of beach conditions. On most days, virtually the only people at the beach are dog owners (with their dogs), surfers, the occasional jogger, a few kids drinking and smoking dope, and perhaps a random couple that might be better served in a motel room. Ocean Beach does NOT adhere to the vision of the prototypical California beach. It is rarely warm, sunny and conducive to "beach days." This is worth noting in terms of analyzing who it is that actually uses the lands that you are targeting with these needlessly restrictive new measures. On the handful of beach days that do occur within the city, Ocean Beach is of course inundated with the people coming out to enjoy the weather. Following any of these days, the beach is left in a total state of disarray: trash, bottles, and other assorted crap strewn from one end of the beach to the other, which stands in stark contrast to the dog walkers who are generally excellent about picking up after themselves, their dogs, and in the wake of the messes left behind by the constituency that you are clearly most interested in appeasing, the trash of others. Furthermore, in my experience, those that don't like dogs appear to be in an overwhelming minority. I have a very friendly dog, he likes to greet just about everyone. As such, I am very conscientious about making sure that he is not a nuisance. It is extremely rare that we encounter someone that is clearly made uncomfortable by his presence, and when it does occur it is never an issue, we simply move on and the person is left in peace. I am not sure why we need to be so over-protective of these people (who may or may not actually exist). Quite honestly, I regularly encounter lots of people and situations in this world that I am not particularly excited about, and when it happens, I extricate myself from the situation as to eliminate the annoyance. For what it is worth, I would much happier if all of the idiots who come to the beach and trash it, throwing cigarette butts, beer bottles and whatever else they bring strewn around (and incidentally trampling the areas most sensitive to the plight of the snowy plover) were restricted from accessing the GGNRA, but this does not appear to be a concern of the NPS. For my part, I understand that in living within a large metropolitan area I must accept the reality of having to encounter many such annoyances. I think it is unfair and entirely unreasonable to attempt to create a safe-haven for one minor constituency at the expense of a much broader one. It is not as though

we are talking about a wild pack of pit bulls attacking people on the beach. Most of the dogs out there are extremely well behaved and are with owners that are generally very considerate of whoever else is on the beach. If there is somebody that has an irrational fear of dogs, they should either get over it, or visit any one of the countless alternatives to Ocean Beach, where dogs are not allowed. Irrational fears should not be granted a higher priority than those which are rational. Ocean Beach has long been a bastion for dog owners in the city, many of which have acquired particular species of dogs (that require extensive exercise) with the availability of Ocean Beach and other areas within the GGNRA in mind. It is impossible to effectively exercise many species of dogs without giving them access to large spaces in which they can run off leash. Imposing a leash requirement is akin to banning dogs outright, insomuch as the reason that most dog owners take their dogs to the beach is so that they can get exercise (leash = no exercise). To now restrict access to these places will adversely affect the health of the a large number of dogs in the region which will in turn also negatively affect their owners. It does seem unreasonable to make such a drastic change in the rules at a time when so many residents have come to depend on being able to exercise their dogs within this area. There are countless options for visitors who would prefer to not encounter dogs.

It is an utter absurdity that the NPS is touting the fact that the GGNRA is the only park managed by the NPS that currently allows off-leash dog areas as a rationale for why the rule should be changed. This is a circular argument that at its core lacks any sort of reasoning (good or bad). Since the GGNRA is wholly unique from all other properties within the park system, it would seem to make perfect sense that some management policies would differ as well. Implementing within the GGNRA a catch-all policy that may make sense in other places, simply for the stated reason that this is what you have done in other places, is itself far from a credible rationale. The GGNRA is unlike any other property within the NPS and therefore deserves to be managed differently, and it may be worth pointing out that indeed, in most regards it is. For instance the Presidio is the only property within the Parks holdings that has been set up to be self-sustaining. This is such a radical departure from what is done in all of the other parklands, that under the same rationale being used to justify the proposed dog policies it should not have been allowed. Further it is worth looking at the geography of the GGNRA. It is within a huge metropolitan area and operates as much more of a local park than a National Park in terms of who uses it. While San Francisco may be a destination attraction, it would be a stretch to suggest that the GGNRA is itself. Certainly tourists visiting the city do venture into parts of the GGNRA, but these areas are generally limited, and constitute only small part of the typical visitor to San Francisco's itinerary. Additionally, none of these visitors are paying any sort of entrance fee to visit GGNRA, because again, it is being managed differently than all other parklands. So why then does the NPS find it necessary to maintain a

uniform management policy in this one narrowly defined area (dogs) when so much of how the GGNRA is operated already marks a huge departure from the NPS's normal procedures. The GGNRA is essentially a city park. The vast majority of its visitors are local residents. This stands in sharp contrast to every other property managed by the NPS, all of which are primarily tourist attractions. As such, rather than insisting upon the implementation of policies drafted with totally different context in mind, the NPS should be considering the historical usage of the property and the wishes of the locals. These lands have historically been open to use of dogs off-leash. Residents have come to depend upon these places and the vast majority of people who visit them seem to find the setup perfectly acceptable. It is unreasonable to implement policies designed to serve only the interests of a small minority ? at the expense of the majority, who is then left with no suitable alternatives. Why the hell should a small band of hypochondriacally minded bird lovers (with totally lacking in scientific evidence) be able to dictate the policy for the masses (yes we all know who is behind it) Furthermore, in closing these lands to dogs, you will produce a trickledown effect that will detrimentally effect city parks and other areas that dog-owners will then be forced to use en masse. In conclusion, the suggested adverse impacts that dogs have on the environment are grossly overstated and are presented without any scientific data to back up the claims. Further, there are numerous alternatives locations that people who are uncomfortable with dogs can visit, while there will be no such alternatives for dog owners, once dogs are banned from GGNRA. Lastly, the GGNRA is wholly unlike all other properties managed by the NPS and thusly deserve a policy that is designed to effectively serve the needs of the majority of those who regularly use it. I implore you not to eliminate the off-leash sites as you have proposed.

Correspondence ID: 781 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 14:47:31
Correspondence Type: Web Form
Correspondence: Please restrict dogs to on-leash only North of Stairwell 21 at Ocean Beach.

I am a long-time resident of the outer Richmond District of San Francisco. I am on the beach, or walking along the sea wall with my wife, most days in the year. Off-leash dogs are a nuisance and can detract from the enjoyment of the beach experience.

Most dogs are under the control of their owners when off-leash and know how to behave but many do not. My wife, like many people, is afraid of dogs and is made very uncomfortable when dogs come up to her. Dogs off-leash annoy and often threaten me when I am out picking up litter on the beach. Why should our enjoyment and use of Ocean Beach be curtailed by

these off-leash dogs?

It would be ideal if there were no dogs at all allowed on Ocean Beach North of Stair well 21. This is the part of the beach most used visitors and locals, and dogs do nothing but detract from the beach-going experience for most non-dog owners. Dog excrement and urine can also pose a serious health hazard to both beach-goers and surfers as anything deposited along the shoreline will pollute the ocean.

Dogs should not take precedence over people.

Thank you for taking my comments.

Correspondence ID: 782 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 15:21:29
Correspondence Type: Web Form
Correspondence: Hello,

I am writing to formally protest the GGNRA Draft Dog Management Plan. It is already extremely difficult to find hiking trails where dogs are allowed without this ordinance passing. If the GGNRA Draft Dog Management Plan passes, I will have to hold my dog's leash when I go to Muir Beach-- which is one of my favorite places. Please block this from passing.

Thank you, Hadley

Correspondence ID: 783 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 15:27:49
Correspondence Type: Web Form
Correspondence: I am opposed to the proposed regulations which limit dog's off-leash activities and areas. Dog ownership, off-leash dog activities and protecting the environment are not mutually exclusive. Reponsible dog owners need the off-leash areas to exercise their animals and they can happily share these areas with other people. In stead of punishing all dog owners for the actions of a few people who cannot control their dogs, please focus only on those bad owners. Most dog owners are very responsible and care deeply about the environment. PLEASE OPPOSE THIS PLAN AND ANY PLAN WHICH ATTEMPTS TO RESTRICT DOGS IN THE GGNRA.

Correspondence ID: 784 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 15:45:56

Correspondence Web Form

Type:

Correspondence: I support dogs ON leash in all areas of the GGNRA. There is an issue that has not been considered and that is liability. There should be no off leash areas that are not fenced off or otherwise clearly marked off as off leash areas. If this is not done, the GGNRA could be held liable for an injury/adverse event due to off leash dogs. In off leash areas, a person who is injured will have a difficult time holding the owner liable given the assumption of risk. If one goes into an off leash dog area, you are assuming the risks that go along with this, like dog bites or decreased mental health due to off leash dogs. Therefore the dog owner is generally not held liable for these events in these areas. Should the victim argue that they did not know that it was an off leash area (due to poor signage or not fenced off area), the dog owner is still not liable but rather the entity that sanctioned the area an off leash area may be held liable. While still difficult to argue, this would be the avenue a person would be advised to follow. The way to prevent people from injury and/or adversely affected mental health is to have fenced off areas with clear signs. However, I argue that creating a space that is off leash excludes certain groups and is a discriminatory practice. Since the park is asking that people accept the risk of being attacked by dogs, this area is off limits to people who are not comfortable with dogs and certain minority groups that can not interact with dogs (for example strict muslims). Parks should have clear rules posted in every off leash area that among other things should require voice control (which would help with making the dog owner liable). I also suggest that young children not be allowed in off leash areas given their higher risk of being bitten and/or scared. Therefore these areas should be a very small percentage of the GGNRA and should not prevent people from enjoying the majority of the park.

Correspondence ID: 785 **Project:** 11759 **Document:** 38106

Received: Feb,25,2011 16:26:15

Correspondence Type: Web Form

Type:

Correspondence: I am not particularly pro or anti dog. However an incident last weekend confirmed by opinion that all dogs should be on leash at all times when in public areas. I don't have a dog, so I don't know where on and off leash areas are, but after the incident I found out I was actually in an on leash area of the GGNRA. I was walking and I heard someone calling out the name "Leon". I came across a woman up a hill, calling to her dog. The dog was circling two young girls about age 8 or 9. They looked terrified and had their arms up in the air and kept backing away from the dog. The dog continued to follow them and did not look friendly. The dog was clearly not responding to the owner who then reluctantly descended the hill. Even when she got closer the dog would not responding but luckily she was able to grab

the dog by its collar and pull it away from the girls. The dog let out one last loud bark and the girls jumped. The woman did not apologize to the girls or even make eye contact with them. The young girls of course didn't complain to this adult and just seemed relieved for the ordeal to be over. I felt guilty that I just watched because the dog could have bitten one of the girls. I regret not intervening to get the dog away from the girls sooner, but I realized that I was also afraid of the dog. Still, no excuse. I also regret not saying anything to the owner. Hopefully sharing this story does some good and prevents this from happening to other children.

Correspondence ID: 786 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 17:58:44
Correspondence Type: Web Form
Correspondence: Please keep the current laws and rules regarding dogs. They work!

Correspondence ID: 787 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 18:58:11
Correspondence Type: Web Form
Correspondence: I am so sad as a 10-year dog-owner resident in San Francisco that there are still people out there that want no dogs anywhere. I have travelled the country with my pet and on our travels most people we met were very unhappy about the recreational options for their pets and they experienced more pet aggression. They were jealous of our wonderful options in the bay area.

My pet was trained off-leash at Fort Funston and is amazingly well-behaved and obedient. She learned these great behaviors and to be extremely well-socialized (and a much better pet and companion as a result) from being able to recreate off-leash in Marin, Crissy, and the amazing dog-friendly areas that we are so lucky to have in the bay area.

In other parts of the country they are not so lucky. They have strict leash laws, dog pens, and have increased dog fighting, dog aggression, dog misbehaviors (due to lack of great exercise and socialization), and dog illness (due to disgusting pens.) Dogs recreate in parks next to small children and have many more run-ins with people due to the simple fact -- they cannot properly exercise.

As a dog owner for the past 10-years I have witnessed that a well exercised dog is a calmer, happier, and a better adjusted pet that will be better in the community within which it resides.

Crissy and Funston are special places. When my dog goes there or on long hikes in Marin - she is so happy. I often hike with my friends without pets

who love my dogs' companionship on the trip. She often keeps us going. She is a member of our crew. Most dog owners love their pets and they are a member of the family. If they cannot recreate with them it is like saying you cannot recreate with your child or you cannot wind-surf (with your gear) at Crissy. It is plain all out unfair.

We are citizens too with a right to recreate in GGNRA sites too. I have seen happy dogs--and responsible owners who stay in the "known" areas to recreate with their pets responsibly. Most owners are super respectful of this so that we can all enjoy this "common space."

There are a lot of dog pens in east bay -- and I have personally witnessed dog fights, etc there. I was horrified. Also, the dogs just do not get the real exercise like they do at Funston, Crissy, or Rodeo. I have seen no fights at Funston EVER. Dogs are just too happy -- also as an owner I am happy too -- I get a great hike in or a bit of beach time -- because I recreate with my pet. I have a right to recreate with my pet.

On-leash for the entire walk at a place like Funston is a joke. The dogs love the hills near the parking lots -- they run fast and burn off the "energy". They love the paths on the way to the beach. They love the patch of beach and they play -- it is a joy to watch these animals have such fun and joy. As owners, we relax too. We see the beautiful San Francisco in the backdrop while we climb paths. We stay out of the areas that are blocked off for the habitats, and keep to the well worn paths on the back part of the main 2 mile path. I do not think that this is asking too much of GGNRA -- a fantastic special place for owners with their pets to recreate -- when there are literally tens of thousands of GGNRA acres to share.

I feel that if we outlaw animals on the "patch of space" at Funston, the small stretch of off-leash beach at Crissy, the off leash "patch" at Stinson and the allowable open spaces in Marin -- what is next -- outlawing PET ownership entirely? For the past 10 years I have seen harmony in these big spaces. At Funston the families who fear dogs go off to the other side, the windsurfers too. Why is this even a problem? There is already so little space for owners and their pets to recreate in SF yet there is so much GGNRA space -- whats the deal?

Bottom line -- we pet owners have rights too. And those rights include our pets. We should be able to recreate with our pets just like parents recreate with children and cyclers - cycle all over the place. Why are we singled out - - we deserve voice control/off leash recreation areas that are not small pens that will not nearly suffice.

We are the most progressive and cool city to live in with pets in the entire US -- possibly the world. My friends who visit envy us. Are we being

realistic to change this model that works to a "police state" against dogs. This is really horrible and unfair that dogs are singled out and that they and their pet owner citizens will have no rights to recreate and enjoy our state parks.

Times are tough. We are hard working citizens too who pay lots of taxes in this country that support things -- not to mention GGNRA. The land is public and it is only fair to for us all to respect one another and the recreational needs of all citizens not just a singled out group because some people "dislike dogs."

The change to the harmony we presently have is unfair -- due to one groups politics. We have rights too. And I believe that dog owner/taxpayers will fight this one at the polls and with our tax dollars...so lets try to work this out.

Correspondence ID: 788 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The recommended alternative D is basically NO DOGS ALLOWED.

Reviewing Appendix G: Law Enforcement Data a total of four violations were reported for all of 2007.

Why change when the current policy works.

Thank you.

Correspondence ID: 789 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 19:34:31
Correspondence Type: Web Form
Correspondence: I applaud the Park Service's work in constructing this plan and feel that it is a balanced approach that will allow citizens with dogs reasonable access while protecting park resources as well as citizens who don't want their park experience to be impacted by dogs.

Thank you.

Correspondence ID: 790 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 19:48:37
Correspondence Type: Web Form

Type:

Correspondence: Very happy you are doing this assessment and opening comments to the public.

My comments address Upper and Lower Fort Mason.

We run through this area everyday and have done so for years. The current circumstance has been Heaven. That is, Alternative-A, dogs on leash at all times is the preferred choice. No dogs in the garden. The later police enforcement, with tickets being given, quickly got things under control. It was a model circumstance of good administration.

Briefly, the principal issue with dogs in this park is what you denote in your pdf as Visitor Experience and Safety.

For quite a long time dogs roamed the park as owners stood in a huddle in the meadow. This caused all sorts of problems. The owners were not monitoring their dogs and as to be expected, the dogs which were most troublesome were never under voice control. My wife and myself were entering the park from the east path near the community garden and a pit bull came charging over the hill toward us barking and snarling. When we shouted NO the owner, seen only later, as she was over the hill, called her dog back weakly. It took quite a while for the dog to decide to stop its snarling. When I called out to the owner to keep her dog on a leash she exhibited what I would call a Marjorie Knoller reaction: amused indifference. I regret to say that other experiences I won't recount now confirmed that there are a number of such irresponsible owners in any aggregate. It is not the dogs, it is the owners.

Just a few bad owners but a big risk for the public. You must keep the dogs on leash in this area. There is tremendous pressure from a minority of dog owners who see their dogs as extensions of their entitled egos to allow their dogs free reign and to heck with the public. This is unacceptable in a public space.

Correspondence ID: 791 **Project:** 11759 **Document:** 38106

Received: Feb,25,2011 20:24:10

Correspondence Type: Web Form

Correspondence: I am furious at the proposed restrictions on dogs in the parks and on the beaches. Areas such as The Presidio, Ocean Beach, and Fort Funston are located in one of the most dense cities in the country. For every eight people in San Francisco there is at least one dog. There are more dogs than children in San Francisco and there-for it is a necessary to have areas in which dogs can roam and play freely. Do you have a dog? If so is it athletic? Athletic

dogs can never get the necessary exercise on leash. We live in an urban environment and parks within the environment should at least have designated areas for dogs to play and roam freely while under the supervision of their owner. This whole issue is a complete waste of the government's time and money. It's a waste of my time and money because I pay your salary with my tax dollars. Enough is enough. Too much damn bureaucracy. What ever happens, nothing will change any how. We, the residences of San Francisco will letting our dogs enjoy life on leash wherever we please.

Correspondence ID: 792 **Project:** 11759 **Document:** 38106

Received: Feb,25,2011 20:33:59

Correspondence Type: Web Form

Correspondence: To Whom it May Concern,

Please keep as many public parks in the Bay Area as dog friendly as possible. I walk my dogs everyday at Ocean Beach and I have never seen any problems occur because of dogs running free. Close to 100% of the dogs that I have seen there are extremely well behaved and respond to their owners voice commands. All owners carry poop bags and promptly pick up all poops. Dogs will stay out of protected bird sanctuaries if they are clearly marked.

I beg of you to respect the rights of dogs to run free and get the exercise they need.

Thank you for taking the time to read my letter.

Sincerely,

Karen Tuttle

Correspondence ID: 793 **Project:** 11759 **Document:** 38106

Received: Feb,26,2011 10:22:17

Correspondence Type: Web Form

Correspondence: Being a long term resident of both Ocean Beach and Baker Beach in San Francisco I am shocked, appalled and despondent at the "preferred" option to change the rules for the GGNRA.

In addition to being a dog owner I am a staunch "environmentalist" and go out of my way to clean up the beach and do what I can to make everyone's experience on the beach great. Just so you know I am concerned about the

environmental impact of dogs and people on our beaches.

The draconian proposed new rules would be a serious impediment for any responsible dog owners who want to walk their families (that includes their dogs) on the beach, spend the day at the beach or just enjoy the GGNRA.

These rules would make people like myself want to move away from where I have lived for many, many years. I have a six month old son and I love to take him to the beach to explore and show him what we have come to love about this area.

If I am prevented from bringing our dog to any of the places we frequent so much now, it would seriously change our lives.

There are plenty of responsible dog owners that use and enjoy these beaches and to make this change is unwarranted and ridiculous.

Maybe you are simply trying to raise more revenue with writing tickets because through ignorance or choice people are still going to bring their dogs to the beach. Regardless of the motivation, this preferred new rule is absurd and a travesty for responsible dog owners.

I implore you not to adopt these rules. I could not be more impassioned that you are wrong plain and simple.

This is the wrong choice and should not be adopted.

Sincerely, Sean P. Joyce

Correspondence ID: 794 **Project:** 11759 **Document:** 38106

Received: Feb,26,2011 10:47:01

Correspondence Type: Web Form

Correspondence: I'm a bit stunned that you all are considering the total ban of dogs on our beaches. I was born and raised in Marin and after many years of traveling the US and living in several States and many cities within those States I have come to greatly appreciate the way in which folks in The SF Bay Area celebrate our dog friends. This runs absolutely against all of this.

PLEASE RECONSIDER THIS. Please.

Brigham Thompson

Correspondence ID: 795 **Project:** 11759 **Document:** 38106

Received: Feb,26,2011 17:03:17

Correspondence Web Form

Type:

Correspondence: In 1979, the GGNRA formulated its original pet policy, after extensive public hearings. The pet policy stated that dogs could be off-leash in a mere 1 percent of GGNRA lands. As the size of the GGNRA has increased over the years, the acreage in which off-leash recreation is allowed has actually decreased.

Now the GGNRA wants to severely curtail off-leash access to the park, even to the 1 percent. Dog owners are residents too. We would also like to be able to use the park for recreational purposes, which was its original charter. Somewhere along the way, GGNRA seems to have lost sight of its mission and of any sense of public accountability. How else can we explain the unilateral decisions they are making without consulting the public?

It will have an very negative impact on the dog-loving residents of the Bay Area to further close off GGNRA to dogs. We are residents and taxpayers too-please don't take away our 1 percent.

Thanks,

Katherine McCormick

Correspondence ID: 796 **Project:** 11759 **Document:** 38106

Received:

Feb,26,2011 18:45:05

Correspondence Web Form

Type:

Correspondence: To Whom it may concern: I am a daily user of the Marin Headlands, Crissy Filed, and Baker Beach. I would like to support alternative A in all these locations. All three of theses area are essential for dog/human combo exercise and recreation. I find the vast majority of dog walkers -professional or personal, respectful, friendly, and obedient to voice control or leashed areas. In fact, many dog owners walk along with garbage bags and pick up trash. This is a service to the GGNRA and staff. Please keep the existing off leash areas open and available to dogs and their responsible owners. Thank You, Jennifer C

Correspondence ID: 797 **Project:** 11759 **Document:** 38106

Received:

Feb,26,2011 19:48:53

Correspondence Web Form

Type:

Correspondence: To Whom it May Concern:

My husband and I currently have 3 dogs and live in Millbrae. Unfortunately, the dog parks in San Mateo County do not have much space and do not allow access to any water. Almost every weekend we take our dogs to Fort Funston or Crissy Field. We also enjoy day trips to other large off-leash dog parks around the Bay Area.

Considering how densely populated the Bay Area has become and the therefore lack of large open spaces not only for our dogs but also to commune with nature, it would be a huge mistake to take away the only parks dog owners have left to let our dogs run, socialize and play freely. There are plenty of protected parks and areas left. For instance Crystal Springs near the reservoir is a phenomenal trail near the water, but does not allow dogs. Please do not limit the little areas we have left for our beloved dogs as they need places to be themselves and have fun too.

Thank you, Lindy Cestone Figone

Correspondence ID: 798 **Project:** 11759 **Document:** 38106
Received: Feb,26,2011 20:52:24
Correspondence Type: Web Form
Correspondence: First, thank you for the opportunity to comment on this plan. As a dog owner, I appreciate and welcome those opportunities where my dogs can peacefully roam off-leash in the beautiful parks we have in San Francisco. I am also mindful that these parks are for the enjoyment of everyone - not just my dogs - and so make every effort to ensure they are not a nuisance and are safe for others to be around - especially children. And that is actually what I see more often than not in other dog owners too: going to the park in the early hours, staying to areas less frequented by families, etc. So - I marvel to see that the plan as put forth is as restrictive as it is - effectively eliminating any off-leash areas for dogs. As I understand it - the reason behind this plan is that there have been "some" dogs - no actual numbers given - that have been a problem. That there is so little real evidence to support this measure is a real problem. I can't emphasize that enough. The other aspects to this that I find troubling are: First, the solution that has been presented is an "either/or" as if there were no other alternatives or steps that could be put in effect to address the issue. Second, if there is a problem I have to believe it's less than a 1% problem - and you don't solve that kind of problem in this manner. A tiered penalty with enforced behavioral schooling is a much more effective means of addressing problem dogs and their owners. This plan as written should not go forth. Thank you for your time and attention, KD

Correspondence ID: 799 **Project:** 11759 **Document:** 38106

Received: Feb,26,2011 21:56:32

Correspondence Web Form

Type:

Correspondence: I agree with most of the changes, although I would like to see more restrictions on dogs in grassy areas. How will this be enforced? Currently, my visits to Sutro Heights Park and the Airfield at Crissy Field are often ruined by off-leash dogs. How will a change in the law actually be enforced?

Overall, I support the changes for the areas we frequent.

Correspondence ID: 800 **Project:** 11759 **Document:** 38106

Received: Feb,27,2011 00:32:46

Correspondence Web Form

Type:

Correspondence: My wife and I own 3 dogs and enjoy taking them out to dog parks that allow them to run free, and exercise in a large open space with access to open water for swimming. Since there aren't very many places in the Bay Area that allow for this, it seems ridiculous and unfair to our companions that you are considering drastically limiting our access/ability to continue doing this. There are enough restricted/protected areas in the Bay Area- I don't think that restricting access to these relatively small areas is going to make a difference in affecting these local natural ecosystems.

Please don't take this away from us and our loved ones.

Correspondence ID: 801 **Project:** 11759 **Document:** 38106

Received: Feb,27,2011 02:19:15

Correspondence Web Form

Type:

Correspondence: It's estimated there are over 100,000 dogs and dog owners in San Francisco, alone, and over 1,000,000 in the greater Bay Area. While only a small fraction walk in the GGRA parks and beaches at any one time, this population should have rights to access these lands and have an appropriate portion of each set aside for that purpose. It is not too much to ask that two beaches be available to this population, specifically Crissy Field and Muir Beach.

Much has been made of the environmental harm and dangers that dogs pose in these areas. Inconsiderate owners who don't pick up after their pets, disturbances to wildlife, the potential for aggressive dogs biting humans or fighting other dogs. While it is true that any of these may happen, their occurrences are rare and have been grossly exaggerated. My experience in the parks and beaches is that the participating dog owners are self-regulating

and self-policing. Aggressive dogs are not tolerated. Waste receptacles are provided and used. Owners respect the sensitive, off-limits zones to preserve wild-life habitat.

In my experience, a greater threat to the environment comes with non-dog owners who leave litter on the beach and don't remain on the pathways. Should not, then, all people be banned from the parks and beaches, by the logic of a dog ban?

Correspondence ID: 802 **Project:** 11759 **Document:** 38106
Received: Feb,27,2011 09:45:18
Correspondence Type: Web Form
Correspondence: I have been walking my dog at Crissy Field for the past 4 years (she's 5 now) and it's her favorite place to walk. She loves playing with the other dogs and she gets a lot of exercise running in and out of the ocean. After 45 minutes on the beach I have a very content dog. Without access to Crissy Field she would miss out on important socialization and the exercise. There are fewer and fewer places I can walk my dog off leash and she needs a lot of exercise. Without this we'll be confined to dog parks which are not nearly as much fun for her. The public does not seem bothered by the dogs at Crissy Field as we, for the most part, gather in one area. Anyone wishing to sit or play on the beach merely does so a little further down the beach.

It would be a real tragedy to lose the GGNRA as a place we can watch our dogs run and play. Please keep it open to off leash dogs.

Thank you, Elizabeth Harvey

Correspondence ID: 803 **Project:** 11759 **Document:** 38106
Received: Feb,27,2011 11:15:14
Correspondence Type: Web Form
Correspondence: I have lived in San Francisco since 1980 and have used GGNRA Fort Funston, Ocean Beach to walk my dog for years. I want these places to remain dog friendly in the future. Thanks, Jack Huntington

Correspondence ID: 804 **Project:** 11759 **Document:** 38106
Received: Feb,27,2011 12:00:22
Correspondence Type: Web Form
Correspondence: I am a frequent user of the GGNRA. I hike frequently in various parts of the park. I visit the Point Bonita Lighthouse, Tennessee Beach, Black sand

Beach, Rodeo Beach and other less-known parts of the GGNRA. I do not own a dog and do not plan to own one.

One of the great pleasures of the GGNRA is the near complete absence of regulation. It is a place where people are free to enjoy on of the most beautiful places in the world with very little restriction. I can understand how permitting dogs in a place like Yosemite N.P. would cause countless problems, let us not forget that GGNRA is almost an urban park.

In more then 33 years of visits, I have personally NEVER encountered a problem caused by the presence of dogs - leashed or unleashed- within the GGNRA. with plenty of signs for guidelines, I have found dog owners to be extremely responsible. If a large-scale problem ever arises, we could THEN re-visit the rules of the park.

Keep the dogs free; they are a pleasant addition to this beautiful park.

Correspondence ID: 805 **Project:** 11759 **Document:** 38106

Received: Feb,27,2011 14:36:04

Correspondence Type: Web Form

Correspondence: I am in favor of the proposed alternatives as stated in the document. They seem reasonable and aim to meet all needs. I am not a dog owner at the moment but enjoy them. I walk at Lands End frequently where most dogs seem to be off-leash even though there are posted signs to be "on-leash". (Actually, the bicycles on the trail are much more of a hazard) As with current regulations, enforcement is rare. The document does not address this issue as far as I could see. So my question is: Why go to all this trouble and expense to set new regulations if there will not be the staff to enforce them??

Correspondence ID: 806 **Project:** 11759 **Document:** 38106

Received: Feb,27,2011 15:11:47

Correspondence Type: Web Form

Correspondence: Thank you for your work on this topic.

In general I do not endorse off-leash access for dogs in GGNRA.

I would like to note by objection to the proposed ROLA areas at Crissy Field which is a heavily used area by children and others. A permit managed off-leash area would present a visual approval of off leash activity and enforcement would be confusing.

The GGNRA Presidio has sufficient unused playing fields which are not generally populated and which could be converted to open dog run areas.

Correspondence ID: 807 **Project:** 11759 **Document:** 38106
Received: Feb,27,2011 15:42:40
Correspondence Type: Web Form
Correspondence: I oppose strongly the proposed changes to off leash dog activities at Fort Funston and other areas in San Francisco. Off leash dog access should be increased, not restricted. Time and again the courts have ruled against the GGNRA's manipulation of rules requiring off-leash dog activity. Restricting access for off-leash dogs also violates the original agreement when Fort Funston and other lands in San Francisco were given to what is now the GGNRA.

Correspondence ID: 808 **Project:** 11759 **Document:** 38106
Received: Feb,27,2011 15:46:41
Correspondence Type: Web Form
Correspondence: The GGNRA's Dog Management Plan is wrong, and should be defeated. A tiny percentage of land of the GGNRA is available for off-leash dog walking, and off-leash dogs do not affect in any meaningful way the management of other areas in the GGNRA.

Correspondence ID: 809 **Project:** 11759 **Document:** 38106
Received: Feb,27,2011 17:05:13
Correspondence Type: Web Form
Correspondence: I think you are on the right track for a solution to this issue with your preferred alternative that works to balance the visitor uses on GGNRA lands. Although I would prefer that on park lands, dogs be on leash, I understand that would be a political non-starter these days. Thus providing a number of areas, including some significant beach areas, where dogs can be off leash (but firmly under voice control per the new rule) and yet separate from other users - for the most part - is a good compromise. I will really appreciate knowing for sure where I can go to experience park lands without people's pets. Dogs are pretty much ubiquitous in the Bay Area; it's a treat to be able to put some distance between oneself and urban-ness so I really value the Bay Areas park lands. Additionally, I was injured by an overly active dog and am wary around them - guarding against another knock down that could put me back in the emergency room. Another reason why I prefer trails that are dog-less. Finally, I also agree with the concept of flexible management; if this user group consistently violates regulations, it should

absolutely be curtailed - especially in this case when a unit of the National Park system is pushing the envelope in trying to accommodate a use that is prohibited in all other national park units. Hopefully the responsible dog walkers will exert peer pressure to encourage others to follow whatever final rule comes out of this process.

Correspondence ID: 810 **Project:** 11759 **Document:** 38106
Received: Feb,27,2011 17:05:18
Correspondence Type: Web Form
Correspondence: Please keep the dog parks dog friendly. Off leash areas are hard to find as is. SF is such a great dog city. We work full time to pay the bills and want a dog. Off leash dog walkers are great. Our dog gets more exercise then we do.

I get that some people abuse the off leash areas but they are a minority. Permits and rules can solve these problems without out right bans.

Correspondence ID: 811 **Project:** 11759 **Document:** 38106
Received: Feb,28,2011 00:17:49
Correspondence Type: Web Form
Correspondence: we have 2 dogs that are cattle dogs,which means that they are full of energy and needs to run and play every day.we do not have many dog parks near by where we can bring them for their exercise.you want to implement the leash law for dogs .it will take away so much joy and happiness .if you are human and ever observe dogs running along the beach or chasing the tennis balls you will see pure joy in them.they don't ask for much nor do dog people.we just want what dogs should be entitle to.a little bit of supervised freedom.put your selfs in their shoes or paws,would you not want a little freedom to run and joy in your life?please reconsider this.you can judge a country and it's people by the way they treat their animals.

Nancy Yeeting

Correspondence ID: 812 **Project:** 11759 **Document:** 38106
Received: Feb,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: It always amazes me that when there are unbearable problems in our state, our representatives find the most ridiculous, restrictive and mean-spirited things on which to legislate. There is not much reason that I can see for this, your latest attempt at control, but be assured this will not stand without a

fight! We the people are getting used to having to fight. You really dont want an angry, hungry, nothing-to-lose citizenry on your hands. Pay attention.

Correspondence ID: 813 **Project:** 11759 **Document:** 38106
Received: Feb,28,2011 09:22:07
Correspondence Type: Web Form
Correspondence: Please do not restrict off-leash dog areas as indicated in this document. Dogs need to have adequate space to be off leash to run and release all of their energy so that they are well-balanced dogs. It is well known that if dogs do not have adequate exercise by running and playing, they can develop behavioral issues including aggression to people and other animals. Dogs can not get adequate exercise if they are forced to remain on leash. Please do not limit off-leash dog areas.

Correspondence ID: 814 **Project:** 11759 **Document:** 38106
Received: Feb,28,2011 09:48:44
Correspondence Type: Web Form
Correspondence: Please keep Marin Headlands and Muir Beach accessible to off leash dogs. If the laws must revised there should be a popular vote. The trails and beaches do not stand to benefit from further restrictions.

Correspondence ID: 815 **Project:** 11759 **Document:** 38106
Received: Feb,28,2011 10:26:30
Correspondence Type: Web Form
Correspondence: The plans outlined here are far too restrictive. In general, dog owners are responsible and committed to maintaining the environment.

Dogs should continue to be allowed to be off-leash at Fort Funston at all times as this is a real asset and crucial to dog owners in the city. Current leash restrictions for dogs off leash at Ocean Beach, Baker Beach and Crissy Fields are fine as is.

If you do choose to restrict off-leash times for some beach areas, you should still allow off-leash dogs in the mornings (perhaps until 10 AM). This is done frequently on the east coast and works well.

Correspondence ID: 816 **Project:** 11759 **Document:** 38106
Received: Feb,28,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: There are so few safe places for dogs to get much needed exercise. This is an urban environment, there is plenty of places for wildlife and botanical conservation in rural areas and National Parks.

Correspondence ID: 817 **Project:** 11759 **Document:** 38106

Received: Feb,28,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: The DEIS is almost 2,200 pages, in two volumes. It includes a devious plan to reclaim the recreational aspects included in the original GGNRA enabling legislation, for those of us who walk dogs in parts of the GGNRA, and have for almost 40 years. I hope this proposal is sufficiently outrageous to write its own obituary.

Correspondence ID: 818 **Project:** 11759 **Document:** 38106

Received: Feb,28,2011 12:45:54

Correspondence Web Form

Type:

Correspondence: As a life-time naturalist, animal and bird lover, I suggest that it would be irresponsible of the department, to choose any Alternative but A or instead to do nothing yet. This would provide additional time to create a more realistic and effective alternative than is proposed in DEIS Alternatives B-E. GGNRA needs to rethink it's victimization of off-leash dogs and any proposal that severely restricts the few off-leash dog areas left in the metropolitan areas. These areas are essential to the well being of thousands of citizens. Reduction of this space for off-leash dog enjoyment will not necessarily protect endangered species nor preserve areas for future generations. Constricting the space as much as most of these Alternatives propose is unacceptable.

It is widely suggested that the origin of these proposals are a result of the local Sierra club's refusal to agree with any proposal allowing dogs in recreation areas. If true, this perspective is fundamentally unbalanced and out of sync with the needs of many of this city's citizens. It is biased against dogs and owners and promotes the suppression of a huge part of our society. For the sake of possibly preserving the life of plants and animals that may or may not survive despite our best efforts; the DEIS Alternative complicates what could be a simpler, less expensive solution for enforcement. They would very likely lead to increased conflict as more and more people are forced into smaller and smaller areas. B-E Alternatives are all slanted to condemn dog-owners and therefore they do not appropriately serve a

majority of the community .

Furthermore I question the victimizing of dog owners and their dogs as an effective and realistic solution to preserving endangered areas, providing a variety of visitor experiences, improving visitor and employee safety, reducing user conflicts, nor maintaining park resources and values for future generations. The level of enforcement required by Alternatives B-E would be much more excessive and create a resentful and antagonist atmosphere. Alternatives B-E blatantly lack many other possible solutions that would not require such extreme restrictions to people and their dogs.

In support of my thoughts, please understand that I regularly visit Crissy Field on a minimum bi-weekly basis, and have since its makeover. In all my hundreds and hundreds of walks at Crissy Field I have rarely seen an aggressive altercation between dogs, and dog owners or dogs and other people. Nor have I seen a person in danger from a dog. I imagine that altercations have occurred since they are proposed in the DEIS summary, yet I have not witnessed them. This experience includes weekdays (when dog walkers have their packs), mornings and dusk, and weekends, (when children and families are prevalent). The majority of my time there has been peaceful and positive and I have observed that other people are enhanced by the experience of interacting with unleashed dogs. Even before I adopted my dog I too would go to the Crissy Field to be around the joy of dogs and their owners experiencing the freedom of open space in a beautiful setting.

For those irresponsible dog owners I am not ignorant, oblivious nor in approval. In fact I would love to find a way to severely penalize those who disregard rules and responsibility and ruin a beautiful situation for the majority of the rest of dog owners. In all my time spent at Crissy Field, however, I have very rarely seen a park ranger or an enforcement of park rules. It took years for the GGNRA to put up a more substantial barricade to restrict the protected plover region of Crissy Field. Yet it resulted in an immediate and dramatic lessening of unleashed intruders. Why then hasn't this approach been more widely used through out all the proposal areas of the city and beyond?

The bottom line is that this recreation area exists as an antidote to city life for all it's citizens, their children and their dogs. Appropriate wild life restrictions are in place and it is up to the GGNRA to enforce these restrictions more effectively, rather than discriminating against dogs and dog owners with restrictive plans. More substantial barricades, more signage and dog owner education, more public awareness and, more frequent enforcement by park rangers would go a long way to correcting any of the proposed problems.

In summary:

- Good fences make good neighbors. Install more substantial barricades to protected areas, this would go a long way to keeping people and dogs out.

- Why must the GGNRA victimize dogs and dog owners, by diminishing the size of off-leash areas, in order "to preserving endangered areas, providing a variety of visitor experiences, improving visitor and employee safety, reducing user conflicts, nor maintaining park resources and values for future generation" as is stated in their motivation for these plans?

- Currently the GGNRA does not consistently provide rigid enough fence boundaries around their endangered areas to prevent invasion, doing so would improve the safety of the areas with out having to diminish off leash areas. When finally a more defined fence was placed at the snowy plover area of Crissy Field I noticed a drastic reduction in people visiting the area or off leash dogs.

- During my hundreds of walks through out Crissy field I do not remember seeing an incident where people were endangered by dogs. If anything I've seen people in boats killing birds near the shore because they've come to close much too fast. Also, I have but once seen a conflict and this was between dog owners. The majority of dog owners are very aware of those around them, families, windsurfers alike.

- In all my years visiting Crissy Field I have seen maybe 3 rangers on 3 separate occasions. Put more rangers or police out and heavily penalize irresponsible dog owners who invade protected areas, don't clean up after their dogs and don't properly control them.

- Put the onus on responsible dog owners to act policing less responsible owners.

- The GGNRA currently bans dogs from many too park areas as it is. This deters dog owners from going to those areas and robs them of enjoyment. What if parents were told that they can not bring their children to walk on trails in the marin headlines or Mount Tam?

- This crowded metropolitan bay area needs to maintain more sufficient open space off- leash areas for dog owners and their dogs. It is essential to the quality of life here that sufficient recreational areas are that are not overly slanted by unrealistic vendettas against dogs for wildlife preservation.

Received: Feb,28,2011 13:55:49

Correspondence Web Form

Type:

Correspondence: I am a responsible dog owner in Mill Valley and my family and I would be so upset if dogs were prohibited from being off-leash in the GGNRA. My dog's most favorite activity is to run free outside, play with other dogs and have fun. Please do not close off these beautiful areas to our dogs and create an unnecessary leash law.

Correspondence ID: 820 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,28,2011 14:48:18

Correspondence Web Form

Type:

Correspondence: Seems like some concessions for off-leash areas should be made. As city dwellers, we should be able to allow our animals some un-leashed access to nature paths and open space. I am still reading the document but do not see this type of compromises. I hope it will be in there somewhere but off leash dog areas within the GGNRA would be the least we could offer all residents of the local counties who have come to depend on the recreation areas available to us.

Correspondence ID: 821 **Project:** 11759 **Document:** 38106

ID:

Received: Feb,28,2011 18:39:52

Correspondence Web Form

Type:

Correspondence: COMMENT ON DOG PLAN FOR MORI POINT, Pacifica.

I am a regular user and live in an adjacent area. I prefer Alternative A (on-leash walking for all developed trails) to the current preferred alternative. The Park Service preferred alternative seems to allow dogs in the most sensitive habitat (frog ponds) while prohibiting them from being walked on some of the less-used hill trails and also the Pollywog Path which runs along the back fence of Fairway Park residences, and is used very frequently for access by residents of that neighborhood. Because of its close proximity to the residences, family pets such as cats are frequenting the Pollywog Path area in any case -- the people most likely to be inconvenienced by the closing of that trail to dogs are the more elderly and sedate dog owners who will be forced to walk to the Mori Point Road entrance.

There also does not seem to be any useful purpose served by preventing leashed dogs from using Upper Mori Trail, Lishumsa Trail, the Headlands Trail, or the Bluff Grail-- all of which are quite far from the ponds & protected habitat. and also areas less likely to be used by families with small children or elderly visitors, as they are comparatively more rugged with a

steep upgrade.

Alternative A essentially preserves the status quo, allowing leashed dogs on all trails. I would note that I see no problem with closing the Bootlegger's Steps to dogs. Dogs don't need stairs and that particular path is more often frequented by new and infrequent visitors to the park rather than those who regularly walk their dogs in the area.

Correspondence ID: 822 **Project:** 11759 **Document:** 38106

Received: Feb,28,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am deeply opposed to the "Preferred Alternative Plan for Ocean Beach" for the reasons listed below. I have lived by Ocean Beach for close to 25years and as an avid dog walker and surfer visit the beach at least twice a day. We need dog access on the middle and south ends of the beach.

1) The beach access for dog walkers needs to be maintained for the residents of the Parkside and Sunset neighborhoods. A significant number of the residents of these neighborhoods have chosen to live and buy or rent homes in this area so as to be able to have dog walking access. This would constitute major life changes for these residents. I understand that federal land is for all, but I believe that the needs of the people who live in such close proximity to Ocean Beach are worthy of special consideration. For the residents of Sunset and Parkside, ocean Beach is essentially our front yard.

2) The amount of dog walkers walking to the beach from the Sunset and Parkside neighborhoods is very high. On weekday mornings 25-50% of the beach traffic comes from these folks. If the preferred plan goes into effect, all of these people will now get into their cars and drive to the North end of the beach. The plan does not account for the increased vehicle traffic and parking requirements this will cause. Not to mention the increase in vehicle related pollution. Most of the beach use studies I have noticed have taken place on weekends in the middle of the day. I am not confident the plan has an accurate beach use assessment. I am afraid that the beach use in the morning and evening is not well understood.

3) The preferred plan limits dogs to the "Coastal Trail". This trail is not maintained nor is it contiguous. There is nothing in the plan or in the history of GGNRA management of Ocean Beach that makes me confident that the GGNRA has the resources to maintain this trail. For this reason I believe that the "Coastal Trail" should not be a part of the plan, making the Preferred Alternative not feasible. Also, please note that the "Coastal Trail" is extremely unpopular and gets very little use. People come to walk on the

beach note next to a highway.

4) Over the last year I have noticed more Snowy Plovers than any time in the last 24 years. This apparent increase should not be occurring if the current dog regulations are not working.

5) It is a very small percentage of dog owners that cause the dog related problems (chasing birds, disturbing humans and not cleaning after). The regulations should target these actions not the majority of dog owners that are conscientious. Just as we do not ban all driving of cars because the few red light runners.

6) Other possible stressors to the Snowy Plover have not been addressed. For example vehicles, motorcycle, horses, heavy sand moving equipment, litter, surface street runoff, construction spoils from the last century, dune erosion and non-indigenous species. I say fix all of the above before focusing on the dogs.

7) Regulating dogs in an urban setting is a challenge that the SF government tries to meet. It does not seem fair that the GGNRA in its' urban areas shirk that challenge and push it off to the City.

8) Dogs on ocean beach are a huge part of the culture, look and feel of the beach. I believe that that huge number of non-dog owners would miss their presence greatly. We want maintain the character of Ocean Beach as something that is uniquely San Franciscan.

Correspondence ID: 823 **Project:** 11759 **Document:** 38106

Received: Feb,28,2011 00:00:00

Correspondence Type: Web Form

Correspondence: We come to SF once a month to go to Ft, Funston with our dog..We have lunch and dinner. Wife does alittle shopping. STOP what your doing-- Government is aready looking very bad ---DO NOT add to it----

Robert Crismon

Correspondence ID: 824 **Project:** 11759 **Document:** 38106

Received: Feb,28,2011 21:43:24

Correspondence Type: Web Form

Correspondence: I really think some off leash dog parks need to exist. Not only is it good for dogs to be able to run free, but it's also good for man's soul to watch dogs running free.

Correspondence ID: 825 **Project:** 11759 **Document:** 38106

Received: Feb,28,2011 22:06:35

Correspondence Type: Web Form

Correspondence: Yesterday was another beautiful day in San Francisco and another reminder of the reason I moved here about 20 years ago. I have been visiting Fort Funston almost every weekend since I moved to the city and yesterday was no exception.

I visit the park to be with nature and with the many dogs that also enjoy the park.

Seeing the dogs running and enjoying their opportunity to play off leash with each other, investigate interesting smells and just get the exercise they need to be healthy and happy animals gives me extreme pleasure.

I worry that the plans that are proposed for the park to change the off-leash dog rules will have a very negative affect on the animals and the people who come to the park. The information I have seen about the off-leash and on-leash areas at Fort Funston is very confusing and doesn't make a lot of sense. The off-leash areas stop and start without any clear or logical reasons why and because it is so arbitrary could lead to people and animals not being able to follow the new rules.

From what I understand, if the rules aren't followed, then the ability for the animals to run, as they need to ? and for us to enjoy time with them ? will be taken away without any form of recourse. One strike and you're out!

This is wrong.

I agree with responsible dog ownership but the new proposal seems like it goes out of it's way to be unreasonably restrictive and has a not-so-hidden agenda to remove dogs from any GGNRA land. Since this is land for all Americans, that does not seem to meet the needs of all the Bay Area citizens.

I strongly believe that the proposal needs to be changed and should not be implemented in its current state.

Correspondence ID: 826 **Project:** 11759 **Document:** 38106

Received: Feb,28,2011 22:38:38

Correspondence Type: Web Form

Correspondence: I applaud the thoroughness of the studies the park service has conducted to come up with these recommendations, but strongly urge reconsideration of the recommended alternatives for both Muir Beach and the Marin Headlands. For the Marin Headlands I would hope that Alternative A would be considered. I live in southern Mill Valley and would be devastated to be prohibited from even walking my dog at all on trails that connect to my neighborhood. This is one of the reasons I bought a home in this area, and to be banned from using the Miwok and Coastal trails would be terribly sad for my whole family (children and canine members included). Today we can walk up the street with our dog and easily access and enjoy the great beauty of the Marin Headlands. Under this plan, we will be relegated to driving miles and miles in a car before we can even walk our dog off the pavement. That just doesn't seem right. Likewise I think completely banning dogs on Muir Beach would seriously deprive southern Marin residents of a major family destination that for many is one of the reasons we live here at all. For the same reasons I would strongly urge consideration of Alternative A on the Alta Trail. Thank you for your consideration.

Correspondence ID: 827 **Project:** 11759 **Document:** 38106

Received: Mar,01,2011 01:38:39

Correspondence Type: Web Form

Correspondence: Dear GGNRA Ranger,

I am a resident of San Francisco who along with my wife, two young boys and our dog Pepper, recreates in GGNRA almost every weekend. Please consider that when access is restricted from one member of our family, in this case Pepper, it means that the rest of the family can no longer use that park. This is because we want to do things as a family, but also because Pepper is a key driver to getting us outside. For or example, Tennessee Beach, China Beach and much of Point Reyes has never been seen by my two boys because Pepper is banned. This makes me very sad and sometimes angry.

Similarly, by restricting certain parks (banning off-leash areas or restraining dogs to fire roads, etc.) they become so uninviting that we no longer go (e.g., San Mateo Open Space preserves, most state parks). All this said I'm for protecting the sensitive ecosystems and wildlife. For example most beaches should have off-leash areas but most of the beaches should be on-leash. It just seems that the restrictions being proposed are just anti-family to satisfy irrational dog haters. There seems to be no other basis for these restrictions.

For these reasons please come up with a new alternative. In every proposal start with the assumption that dogs will be allowed everywhere off leash.

Only restrict access for highly sensitive habitats. Assume that most dog owners are responsible. Assume most park users are happy to interact with families that have a dog. Do not base any regulations on the input from a few problem people or you may be banning children from parks next.

Thanks you for your time.

Scott Snow

Correspondence ID: 828 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 06:40:25
Correspondence Type: Web Form
Correspondence: Fort Funston 1. About the neon orange cones set up parking lot to "stairs." It's cute when a lovely little girl smears her mouth with mom's red lipstick. Not so when a "steward" organization for our parks smears a lovely beach with garish neon plastic "guides." So ugly as to seem hostile towards the park's users, as are the ugly fencing here and there on the trail to protect the (so far as I can tell) ice plant, a hardy weed nobody cares about. 2. About the "stairs" you want to restrict your park users to. I am an elderly woman with bad hips and a small poodle who needs a good run every day. I work at SF State as a lecturer, so I know how much a public employee needs to love his or her work. But again, the stairs feel to a senior with limited mobility hostile, even sadistic on the part of those who planned them. I took those stairs exactly once, and let me tell you, I had to hit the Aleve bottle heavy afterwards. You are discriminating against the handicapped who need to walk their dogs and want to enjoy nature. 3. Take away the porta-potties too and just let us walk our dogs in peace. All you are doing so far as I can see is costing the taxpayers money as you ugly-up Fort Funston (where I have walked my dogs for 30 years), assaulting its users, and now threatening to not share, like cranky little two year olds, the land you have been entrusted to . maintain for its users. Wake up kids.

Correspondence ID: 829 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 08:41:41
Correspondence Type: Web Form
Correspondence: Dear National Parks Service,

Please keep Muir Beach available to us and to our dogs so all kinds of families can enjoy the beauty of the coast together.

Muir Beach's current dog-friendly access policy fosters good-natured interactions between all sorts of people who come to relax at the beach and

the atmosphere is always easy-going with the dogs often acting as a starting point of conversation.

Most dogs I've seen are very well-behaved and I have felt a definite honor system in place with respect to picking up dog poop (the eyes of the beach are most certainly on you).

We love our dogs, we love the beach and we'd love to continue to enjoy our parks together.

Yours Faithfully, G

Correspondence ID: 830 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 10:50:57
Correspondence Type: Web Form
Correspondence: Your proposed policies are in contradiction to the conclusions you draw in the study. To wit, you conclude that dogs have minimal impact on compacted trails. On the south loop of the Oakwood Valley Trail, where the GGNRA plans to mitigate dogs off-leash, the park service built a compacted trail (built by the Conservation Corps.) Also on the Oakwood Valley Trail, your policy indicates that you want to protect the Mission Blue Butterfly habitat. No lupine grows on either the north or south side of the loop (and I believe there was an attempt by the park service to grow lupine at that site.)

Correspondence ID: 831 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 11:03:06
Correspondence Type: Web Form
Correspondence: One of the things that attracted us to move from San Francisco to Marin County was the beautiful beaches and trails that we could enjoy with our family and our family includes our wonderful dog. After living here for a year, I find that the dog owners and dog walkers we often share the trails with are very responsible, environmentally conscious and with well behaved dogs. If I do see garbage on Muir beach it is usually in the form of sandwich bags, soda and water bottles, cigarette butts and other food/drink related items that PEOPLE bring to the beach, The trails that we hike with our dog are in great shape and the majority of people on those trails have their dogs with them also. We are already limited in the places we can go with our dog. Please do not limit that further!

Correspondence ID: 832 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 11:33:59

Correspondence Web Form

Type:

Correspondence: I am a dog owner and I understand why non-dog owners do not want dogs on the beach. This is because there are some dog owners that do not pick up after their dogs. Rather than ban dogs on the beach, and discriminate against all dog owners, I recommend that the NPS require dog owners pay an annual licensing fee that permits dogs with a beach license on the beach. Revenue from licenses and revenue from fines for owners without licenses could provide the NPS with the funds necessary to monitor the beaches for dog owners that 1) fail to pick up after their dogs, and 2) fail to register the dog with a beach license.

I believe this is a fair compromise. It provides much needed revenue to the NPS. It also provides a process by which to police dog owners who are not in compliance. It also prevents discrimination against dog owners who do pick up after their dogs.

If the NPS decides to ban dogs on the beach, it limits the environmental value of the federal property because it will severely limit the number of people allowed on the beach. This is counterproductive to the mandate of the national park service which is to provide natural environments for the benefit of its citizens.

Correspondence ID: 833 **Project:** 11759 **Document:** 38106

Received: Mar,01,2011 12:06:15

Correspondence Type: Web Form

Correspondence: I have read the report and am opposed to the extent of the changes you are proposing. I believe you are overreaching in the amount of land taken from the dogs and their owners--particularly for off leash walking of dogs. Your report is full of comments, statements, dire concerns and issues that are nearly 100% of the time preceeded with "may" or "can" or "might" or "could". I would find your report more compelling if you had the data to support these concerns. "Can" you document the actual increase of dogs in the park areas and "can" you provide multi year trending statistics that demonstrate factually the damage that the dogs are actually causing, not theoretically causing at some time in the future. If you "may" or "can" it would be a more compelling argument than the report as written.

Yes, I am a dog owner and, Yes, I have a professional, licensed dog walker who uses the park for my dog.

Dogs and Humans have cohabitated for longer than any other species has been part of human life--thousands of years. The idea that they are such a tremendous threat as your report implies is ridiculous. We would all be

maimed or dead if the relationship was so dire.

Correspondence ID: 834 **Project:** 11759 **Document:** 38106

Received: Mar,01,2011 12:44:46

Correspondence Type: Web Form

Correspondence: Hi National Park Service -

Please reconsider the quick action you're taking on changing the dog rules across the GGNRA beaches. Where some dogs can be a nuisance and clean up be a frustration to beach visitors these decisions need to be phased in either beach by beach or possibly have half of a beach be dog friendly and the other half (where sun tanners & people who want to be away from animals) can sit on their own. This format is currently working at Stinson Beach and I ask that the organization responsible for making these final decisions consider the impact made once the vote is counted.

Dog owners and their dogs should have the right to run play & exercise on public lands. Granted this is if they and their owners play by the rules. There IS a hybrid program you can come up with please get a focus group, that includes dog owners, together to come up with a win / win solution

Respectfully

Matt Timberlake Dog Owner / Active GGNRA Beach User Mill Valley, CA

Correspondence ID: 835 **Project:** 11759 **Document:** 38106

Received: Mar,01,2011 13:04:45

Correspondence Type: Web Form

Correspondence: I've looked over the Executive Summary, and it looks fairly balanced and well-thought-out. I like that there will be some off-leash areas, some on-leash areas, and some areas dogs, and I like that these decisions seem to be based on the relative environmental impact of dogs in different areas (such as the Crissy Field wildlife restoration area, and the Ocean Beach snowy plover protection area).

It strikes me as potentially problematic that there are two different kinds of permits to have more than 3 dogs, one for private users, and one for commercial users, and that they are administered by different offices. If the prices of the permits are significantly different, I can imagine that professional dog walkers might apply for private permits, and that this would go un-noticed because of lack of communication between the two offices. Since both permits have similar requirements, I think the best way

to handle this would be to offer a single type of permit for a nominal price (only enough to cover the cost of the permit program), and have a mechanism for waiving the insurance requirements for private dog walkers.

Correspondence ID: 836 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 14:07:55
Correspondence Type: Web Form
Correspondence: I do not own a dog. I favor alternative A for Crissey field areas. It is very pleasurable to watch the dogs interact with one another. I think it should continue. Mike Carroll

Correspondence ID: 837 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 17:03:20
Correspondence Type: Web Form
Correspondence: I have reviewed your most recent proposal limiting dogs in the GGNRA and find it unnecessarily restrictive.

It is a joy to see so many people on certain beaches with their dogs, cleaning up after them, and controlling them. I can understand that some places will be off limits, but please keep the current areas in Marin Headlands, Rodeo Beach, and Muir beach open to well behaved dogs and their owners. It is part of the charm of this area.

As I see it, the temporary plan has worked acceptable, and could be implemented as permanent without a huge uproar from the public. I do believe you might recognize that many folks are in favor of accessing our park lands with dogs.

thank you, Jane Hook Sausalito, CA 94965

Correspondence ID: 838 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 17:12:30
Correspondence Type: Web Form
Correspondence: In the eight years we have lived in Mill Valley, we have enjoyed the outdoors with our Golden Retriever, Cody! It was absolutely devastating to hear the news that our rights to enjoy the hundreds of trails in our community with our dog could be banned. I was raised in born in Marin and decided to move back to this area, so we could enjoy the beauty with our family and our dog. My three year old daughter, our 7 year old Golden Retriever and I hike the local trails in our Tennessee Valley neighborhood

daily. Not only do we enjoy seeing our dog enjoy the trails, but I feel a sense of safety with our dog by our side. We've had several encounters with less desirable people on the trails and our dog has always been there to protect us. In all the thirty six years, I was raised in this area I haven't seen one dog fight on the trails. I truly don't understand why dogs are being banned from the beauty of Marin. This area is truly "dog country" and it would be awful if they couldn't be allowed to hike along side of their owners. Please consider our plea to stop the ban to allow dogs on GGNRA parks and trails. We pay an exorbitant amount of money to live in this area and at the very least our dogs and children should be able to enjoy the land we help to pay and support! Michele Mickelson

Correspondence ID: 839 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 18:13:56
Correspondence Type: Web Form
Correspondence: I would like to see the opportunity to have areas where we can bring dogs. There seems to be less and less areas to let dogs run. Maybe there should be stronger penalties to owners who are not responsible.

Correspondence ID: 840 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 19:53:02
Correspondence Type: Web Form
Correspondence: This is a very detailed and lengthy document that, even in table summary, is difficult to understand with regard to the options available to those who would like to keep Muir Beach dog-friendly.

I do understand the need to keep unleashed dogs out of restored areas, and I do practice precaution when I walk my dog off-leash at Muir Beach. So, I do feel that I can continue to abide by the policies already in place at this location. I would not visit the Beach if I could not allow my dog off-leash there. It is the main reason I visit and support this area.

All that said, I am worried that some dog owners do not diligently abide by Muir Beach policies, mainly because not enough clear, no-nonsense, uncompromising signage is posted. Added or better signage, with posted consequences for non-adherence, I feel would be enough to re-train the public in keeping their dogs out of restored areas, if this in fact is a problem.

I have never seen any intentionally negligent behavior on the part of dog owners when I have visited Muir Beach.

Correspondence 841 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,01,2011 20:03:55

Correspondence Web Form

Type:

Correspondence: We are avid hikers, mountain bikers, motorcycle & ATV riders and also have an Australian Cattle Dog. We fully understand that there is the need for multiple park/trail use throughout the GGNRA. We took significant time to train our dog for off-leash voice control, and the breed itself lends itself nicely to off-leash activity. The dogs are insane herders and tend to be virtual shadows of their owners most of the time. Additionally, we've heavily socialized the dog so that it gets along extremely well with both people and other dogs.

Generally it is the few bad apples that often spoil it for the rest, and this applies to everyone, including hikers, mountain bikers, motorcycle & ATV riders and dog owners. Human use of GGNRA is often the biggest spoiler, as the people factor is by far the largest impact on any of the use-areas, including trash/cigarette butts, walking/biking off trail, destroying facilities and overall degradation due to significant use by the sheer numbers of users. But, I don't think that restricting human use is part of this plan. I DO NOT want to see new restrictions added for dog owners at GGNRA parks, but understand that additional rules may need to be adopted at the more "heavily trafficed" parks.

I can understand regulating dog-walkers, as this seems to be abused regularly by a few bad apples, and it seems almost impossible to control more than 3-dogs at a time in heavily-trafficed areas.

We regularly take our dog walking in all the areas outlined in San Mateo county, including Mori Point/Pacifica Beach, Milagra Ridge and Sweeney Ridge. Additionally, we also regularly take our dog to Fort Funston to play with the multitude of other dogs on the beach. We believe that each of these areas needs to be addressed separately, as each has its own unique use characteristics of people and dogs:

- Mori Point & Pacifica beach: Mori Point should remain a leash-use area. Please do not add any new restrictions, as we use this area regularly and it is very popular with dog owners. There are enough people using this area that leash-use is justified. I've never seen any issues at this location, and dog owners all seem to be very responsible. The western end of Pacifica beach (from the Pacifica Pier to the mountain on the south) should be completely off-leash for dogs. The beach is virtually devoid of people except for the one or two occasional users, likely because the beach access is a significant walk, it is often foggy and cold and the undertow is incredible. In all the times I've taken my dog off-leash on the beach, I've only ever encountered a few occasional humans and a few occasional dogs on the actual beach. It is

a virtual no-man's-land and seems that off-leash dog use wouldn't make any material impact at all.

- Milagra Ridge: the parking at Milagra Ridge limits the amount of use. Generally only 6-8 cars can park there at any one time. I take my dog there regularly and might occasionally bump into 3-4 people during an entire hour-long walk. I think that this area should be relaxed to voice-control, but that didn't seem to be an option. Keeping dog restrictions to on-leash at this park should make no impact whatsoever on the use characteristics. All of the dog owners at this park seem very responsible, and I've never seen a single issue in years of use. Please do not make any changes to this park.

- Sweeney Ridge: like Milagra Ridge, this trail/fire road is virtually devoid of anything more than the occasional person. After traversing the steep up/down of the canyon up to the ridgeline, I have rarely ever seen another person at all. The trail is not for the faint-of-heart, and this generally scares off anyone except the most physical/avid hikers. I'd prefer to see this area completely off-leash and voice control for dogs for those reasons. It is one of the best places to have significant open-space with virtually no other human contact to walk dogs. Surprisingly, I've only ever seen 2 other dogs on this trail in my entire years of use, so I don't see any impact whatsoever on human use/environment.

- Fort Funston: this is really a unique location for dog owners. Due to the long hike to the beach from the car parking lot, it isn't usually frequented by regular beach-goers; they usually go to Ocean Beach just up the highway, which is much more accessible. This beach has become an institution for dog owners, because every dog owner knows about it and they all bring them there to play together. Please leave this as voice-control, and, if needed, make adjustments to the Ocean Beach policy instead. The kite flyers and dog walkers have used this beach area for years and don't bother each other. Please don't make any changes to the use-characteristics of this last haven of off-leash dog beach in the area. I'd much rather see some restrictions added to Crissy Field, Baker Beach and Ocean Beach, which are much-much more frequented by multi-use people and tourists than is Fort Funston.

- Stinson Beach: please keep this as on-leash access. We've only used this beach a couple of times, but appreciate being able to take the dog out to the water. I've not seen any issues with dogs/people any of the times we've been there. There are enough people using the beach that a leash-law is justified here.

Thanks, Glenn

ID:

Received: Mar,01,2011 21:13:06

Correspondence Web Form

Type:

Correspondence: I would like to express disagreement with the preferred alternative (alternative C) as it pertains to Rodeo Beach. I strongly advocate for the continuation of an on-leash policy not only on the surrounding trails of the Marin Headlands and South Rodeo Beach, but also on Rodeo Beach itself. I used to work for an educational organization in the Marin Headlands until 2009, and witnessed first-hand the disruption to visitors that off-leash dogs caused, including the following instances: While hiking on the bluffs above Rodeo Beach, an off-leash dog ran into my hiking group of 5th graders. Although the dog was not threatening, two of my students were terrified to tears because they had a fear of dogs from previous experiences and the dog was running among the trail group. The owner appeared a few moments later, and did not apologize but said over and over, "Don't worry, he's friendly." This seems to be a relatively common sentiment among dog owners that fails to respect the fact that not everyone is comfortable around dogs. These students in particular, who are new to the outdoors and national parks, need to feel safe. Will everyone truly feel safe to visit the park if dogs are off-leash? During an educational activity on Rodeo Beach, an off-leash dog ran in to my hiking group, disrupting the activity and distracting students. Although we are accustomed to any number of distractions in the field, this one is easily preventable. Thank you for accepting my input. I hope NPS will continue with their on-leash dog policies so the GGNRA can be enjoyed by all visitors.

Correspondence ID: 843 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,01,2011 23:57:32

Correspondence Web Form

Type:

Correspondence: The DEIS is so wrong in so many ways, it is hard to know where to start. First of all, No matter what plan is finally implemented, the compliance based management strategy is something that cannot be seen as anything other than a way to end dog use use in the GGNRA, and cannot be a part of the final plan. 75% or any other level of compliance is not something that can be accurately measured, and so what will happen is that there will be some degree of non-compliance(there always is), and that level will of non-compliance will be seen as sufficient to go ahead and end all off-leash use in the GGNRA, and that will be nothing but a first step towards a complete no dog ban.

This is not a National Park, it is an urban recreation area. It was created to save these lands from development so that the people of this area could continue to use these lands in the ways they had always used them. I have

lived in SF since the 1970's. I have always loved going to the beach and to our parks, but without a reason to go there, I found that I didn't get out to them as much as I would like to. Since becoming a dog owner again, I have become a regular user. When I was employed, I was at Fort Funston every weekend with my dog. Now that I run my own business, I am there every day. Other people use the area to surf, to fish, to hang glide. All of these uses should be protected. There is no value in a recreation area that is not used. Dog owners get outside, exercise, run their dog, hike, walk on the beach, and amaze our visitors, who come out to see this legendary spot, because there is nothing like it anywhere. Seniors and families with small children can all be found there every day. Pretty much everyone you meet has a smile on his or her face. It is a magic spot. There is a sense of community there as well. If you succeed in turning it into a museum for us to look at you will have killed that magic, and that community.

No consideration has been given to what will happen when these lands are taken away from the people who use them now. Right now we have a situation out there that is pretty impressive in that an amazing number of canines and humans use it together with very little conflict. GGNRA's preferred alternative for Funston would limit off-leash use to the area just north of the lot, and the beach. That area would be home to a huge number of dogs, and groups would be unable to avoid other groups (and therefore, conflict, because there would be nowhere to go. Things aren't perfect now, but a great deal of maneuvering is done by people with dogs and groups of dogs in order to keep things as peaceful as they are. That maneuvering would be next to impossible if we had no space.

The trails would be either leashed or no dogs. This is going to be a problem, especially when groups meet on the trail, and have to pass one another. Aggression is heightened for many dogs when the leash goes on, and getting your group off the trail, so another group can pass is going to be much more difficult with everyone leashed.

The beach will be available to us, but the walk down to it, no matter how you go will be on leash. That will not only be difficult, it will be dangerous. Once we are on the beach, they want us to walk only on the wet sand. I want to keep my dogs safe, and with smaller dogs especially, I want to keep them away from the surf most of the time. Also, the beach is not available to us at all times because of the tides.

Since places like Funston will be so unsatisfactory, the City's parks will be deluged with dogs that used to use the GGNRA. NPS doesn't seem to care. Also, the pack size limits are going to increase the number of walkers/packs, and some of the really good walkers will find other ways to pay the bills when they can no longer make ends meet because of the size restrictions. This will make room for more inexperienced, low wage employee walkers.

With experienced owner operators dropping in number, and inexperienced employees taking their place. Quality of care is not likely to be going up as a result of the new plan. I'm not in favor of huge groups, but making a living with 6 dog groups is going to necessitate a raise in rates that will most likely be unworkable, since there will be large operations with underpaid employees who are able to run enough trucks to do things at the old rates. Not your problem? Not yet.

Correspondence ID: 844 **Project:** 11759 **Document:** 38106

Received: Mar,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am deeply opposed to the "Preferred Alternative Plan for Ocean Beach" for the reasons listed below. I have lived by Ocean Beach for close to 25years and as an avid dog walker and surfer visit the beach at least twice a day. We need dog access on the middle and south ends of the beach.

1) The beach access for dog walkers needs to be maintained for the residents of the Parkside and Sunset neighborhoods. A significant number of the residents of these neighborhoods have chosen to live and buy or rent homes in this area so as to be able to have dog walking access. This would constitute major life changes for these residents. I understand that federal land is for all, but I believe that the needs of the people who live in such close proximity to Ocean Beach are worthy of special consideration. For the residents of Sunset and Parkside, ocean Beach is essentially our front yard.

2) The amount of dog walkers, walking to the beach from the Sunset and Parkside neighborhoods is very high. On weekday mornings 25-50% of the beach traffic comes from these folks. If the preferred plan goes into effect, all of these people will now drive to the North end of the beach. The plan does not account for the increased vehicle traffic and parking requirements this will cause. Not to mention the increase in vehicle related pollution. Most of the beach use studies I have noticed have taken place on weekends in the middle of the day. I am not confident the plan has an accurate beach use assessment. I am afraid that the beach use in the morning and evening is not well understood.

3) The preferred plan limits dogs to the "Coastal Trail". This trail is not maintained nor is it contiguous. There is nothing in the plan or in the history of GGNRA management of Ocean Beach that makes me confident that the GGNRA has the resources to maintain this trail. For this reason I believe that the "Coastal Trail" should not be a part of the plan, making the Preferred Alternative not feasible. Also, please note that the "Coastal Trail" is extremely unpopular and gets very little use. People come to walk on the

beach not next to a highway.

4) Over the last year I have noticed more Snowy Plovers than any time in the last 24 years. This apparent increase should not be occurring if the current dog regulations are not working.

5) It is a very small percentage of dog owners that cause the dog related problems (chasing birds, disturbing humans and not cleaning after). The regulations should target these actions not the majority of dog owners that are conscientious. Just as we do not ban all driving of cars because the few red light runners.

6) Other possible stressors to the Snowy Plover have not been addressed. For example vehicles, motorcycles, horses, heavy sand moving equipment, litter, surface street runoff, construction spoils from the last century, dune erosion and non-indigenous species. I say fix all of the above before focusing on the dogs.

7) Regulating dogs in an urban setting is a challenge that the SF government tries to meet. It does not seem fair that the GGNRA in its' urban areas shirk that challenge and push it off to the City.

8) Dogs on ocean beach are a huge part of the culture, look and feel of the beach. I believe that a huge number of non-dog owners would miss their presence greatly. We want maintain the character of Ocean Beach as something that is uniquely San Franciscan.

Correspondence ID: 845 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 10:02:12
Correspondence Type: Web Form
Correspondence: what is this country coming to ? you want to legislate dog walking on public property i.e. the beaches this is still the USA lets get real and allow our dogs to run free at least on the beach's Thank You c martin sausalito ,ca

Correspondence ID: 846 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 10:54:03
Correspondence Type: Web Form
Correspondence: Do not limit and reduce more space for dog owners. We need to be able to take our dogs to the beach, parkland, and let them run and exercise and have fun. Our parks should be open for dog owners and dogs too.

Correspondence ID: 847 **Project:** 11759 **Document:** 38106

Received: Mar,02,2011 10:58:59
Correspondence Type: Web Form
Correspondence: I oppose the proposed reduction in "off-leash" use of GGNRA.

Correspondence ID: 848 **Project:** 11759 **Document:** 38106

Received: Mar,02,2011 11:25:27

Correspondence Type: Web Form

Correspondence: ITS ABOUT TIME NON DOG OWNERS NAVE RIGHTS TOO !MY WIFE NO LONGER GOES ON WALKS IN THE PARK OR ON THE BEACH AS DOGS JUST RUN AMOK AND SHE IS VERY SCARED OF DOGS AS SHE WAS BITTEN IN THE FACE AS A CHILD.IT WOULD BE NICE TO WALK AROUND AGAIN AT OUR GREAT PARKS AND BEACHES WITH THE THOUGHT OF NO DOGS RUNNING UP TO HER OF LEASH AND SCARING HER HALF TO DEATH AND POSSIBLY BITTEN. UNFORTUNATELY MANY DOG OWNERS ARE SELFISH AND WOULD NOT ABIDE BY LEASH LAWS AND NO DOG ZONES ANYWAY.I SEE DOGS IN MALLS ,STORES, STARBUCKS ,EVERYWHERE.THIS CITY HAS GONE TO THE DOGS !I AM NOT THE ONLY ONE THAT BELIEVES THIS EITHER. I DRIVE A CAB AND TALK ABOUT THIS PROBLEM WITH MY CUSTOMERS WHO AGREE WITH ME.YOU CAN NOW TAKE A COMPANION DOG INTO A RESTAURANT AND HAVE IT SIT BESIDE YOU AS YOU EAT AND THE RESTAURANT CANNOT REMOVE YOU FOR FEAR OF A LAWSUIT ! WHAT HAS THIS CITY BECOME?

JAY

Correspondence ID: 849 **Project:** 11759 **Document:** 38106

Received: Mar,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I oppose the planned restrictions on "off-leash" use of the GGNRA.

Correspondence ID: 850 **Project:** 11759 **Document:** 38106

Received: Mar,02,2011 12:37:50

Correspondence Type: Web Form

Correspondence: I basiclally support efforts by the GGNRA and National Park Service staff to keep the leash on dogs, literaly and figuratively.

IN particular, I am concerned about the shoreline along Crissy Field, Baker Beach, China Beach and Ocean Beach.

I think it is important to protect breeding grounds for wildlife, which can be

disrupted by dogs, off leash or on.

I also think that San Franciscans and Bay Area residents should learn that not all open space, large or small, automatically qualifies as a dog run.

In my own neighborhood, the local park, Noe Courts, has over the years been transformed from a no dogs allowed to a de facto off leash dog area. This resulted in some of my neighbors' and our own daughter and son in law being ptu off from using the grassy area for fear of contamination by dog urine and dog feces.

Correspondence ID: 851 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 12:51:28
Correspondence Type: Web Form
Correspondence: I oppose the planned restrictions on "off-leash" use of the GGNRA.

Correspondence ID: 852 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I oppose the planned restrictions on off-leash use of the GGNRA

Correspondence ID: 853 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 13:12:24
Correspondence Type: Web Form
Correspondence: As a dog owner, a San Francisco home owner and a tax payer, I propose

Alternative A: No Action (36 CFR 2.15, 36 CFR 7.97 (d); 1979 Pet Policy; GGNRA Compendium)

for all sites.

There are so many dog owners in San Francisco like me that would never go for a walk, hike or run on any GGNRA site without my dog, so it is alarming to me that there are proposals to restrict dogs altogether from certain sites. While I understand the need for environmental protection of certain areas, it is my feeling that wherever a human is allowed to walk, a dog should be able to as well. Further restrictions mean that me and my fellow dog owners and tax payers would not get to enjoy GGNRA as intended: "The purpose of GGNRA is to offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic, and recreational values". The proposed further restrictions would eliminate the "large and diverse urban population" portion of that mission statement.

I would propose that instead of further restricting dogs in GGNRA to on-leash, or no dogs, that fines be increased for breaking the current restriction laws, allowing out of control dogs off leash, and for not cleaning up after your dog. This would protect responsible dog owners rights to be able to enjoy GGNRA and properly exercise their dog, while fining the irresponsible dog owners that break the laws and ultimately cause the initiation of plans such as this.

My personal concern is for Fort Funston and Ocean Beach. I live 2 blocks from Ocean Beach and bought my house there primarily to be near a beach that allows dogs to run free on voice control. I am respectful of the Ocean Beach Snowy Plover Protection area and do not argue with the need to have seasonal restrictions of that particular stretch of beach, but do take issue with the proposal to change the rest of the beach to on-leash. Dogs need off leash opportunities and fenced in dog parks are not sufficient to truly exercise a dog. Dogs that are not exercised properly are more trouble to society than voice-control areas could ever be. Fort Funston Beach is an ideal off leash/voice-control beach because it is protected by the cliffs from the road and remote enough to ensure that dogs are safe; it is a valued place to take dogs and it would be a shame to lose that freedom. And that area is primarily utilized by dog owners and dog walking groups; once again, if that area is restricted to on leash or no dogs, the "large and diverse urban population" that makes the most and best use of that area would be eliminated.

I propose:

For Ocean Beach Snowy Plover Protection Area (Stairwell 21 to Sloat Boulevard): Alternative A: No Action (36 CFR 2.15, 36 CFR 7.97 (d); 1979 Pet Policy; GGNRA Compendium)

For Ocean Beach North of Stairwell 21 South of Sloat Boulevard:
Alternative A: No Action (36 CFR 2.15, 36 CFR 7.97 (d); 1979 Pet Policy; GGNRA Compendium)

For Fort Funston (excluding areas closed by fence or signs): Alternative A: No Action (36 CFR 2.15, 36 CFR 7.97 (d); 1979 Pet Policy; GGNRA Compendium)

It appears to me that the proposed further restrictions are alienating a very large portion of the tax-paying population and that those of us who pay taxes, are responsible dog owners, clean up after our dogs, and have very friendly, social dogs, are the ones that are being punished.

Juliette Gorman Outer Sunset neighborhood

Correspondence ID: 854 **Project:** 11759 **Document:** 38106

Received: Mar,02,2011 14:16:13

Correspondence Type: Web Form

Correspondence: As a resident of San Francisco who lives one block from Ocean Beach I find it appalling to even consider banning dogs from being permitted at Ocean Beach. I am on the beach daily with my dogs, rain or shine, and apart from the occasional sunny warm day at the beach when everyone from the Mission come out to the beach, most of the users of the beach are walking dogs. This is not southern california and as much as everyone would like to encourage more visitors to this part of the city, having dogs on the beach is not why people don't go to the beach. Furthermore, Ocean Beach is one of the dirtiest beaches I have ever been to and this is not due to dogs nor to beach goers. The huge tidal flux twice daily constantly delivers and removes all sorts of debris from inside the bay to our beach. I challenge anyone to find evidence of a dog being on Ocean Beach and then return in the next few days and still see it on the beach. Between the large surf, large tidal changes and relentless wind the beach cleans itself. Dogs are not the problem. If the preferred plan is implemented I anticipate that the path relegated for walking dogs will become one of the most overused and dirtiest parts of Ocean Beach. I for one am for no change to the current regulations. This goes for all other areas also.

Correspondence ID: 855 **Project:** 11759 **Document:** 38106

Received: Mar,02,2011 15:27:24

Correspondence Type: Web Form

Correspondence: I favor the most open plan for each area including the off leash areas. As a dog owner, I am continually appalled at the trash left behind by humans and the rude, dangerous and offensive behavior of runners, mountain bikers and picnicians at our parks and on our trails. We only live here to enjoy the outdoors with our pets and if that is severely limited we will reconsider our decision to remain here. I am also disturbed by the amount of time and resources (2400 pages - really) spent on this project. I am a Trustee for the SF Maritime National Park Assoc and realize how much the state and federal parks have been cut - my husband and I are both big supporters of the park system. I can only snicker when I read about people being disturbed by dog barking and waste. How many times have I been literally run over by bands of men on mountain bike yelling and screaming as well as passed a rock where they have just peed. I know you are tasked with a difficult job here but dogs do not cause their own problems - people do - and we so loosely regulate people. Don't penalize the majority of law abiding dog owners to satisfy the whims of the vocal minority. Just watch the kids at Chrissy Field run right through the restricted areas and you will see what I

mean. Today's parents will not discipline their kids so well all loose. Again I favor the lease restrictive plan for each area and the maintenance of the most off-lease walking areas.

Correspondence ID: 856 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 15:34:19
Correspondence Type: Web Form
Correspondence: March 2, 2011

To Whom It May Concern,

For the past seven years I have hiked daily on the Marin Headlands trails, especially the Miwok trail, with my golden retriever, Sadie, whose photo is included. On occasion we also hike the Oakwood Valley trail. Our daily hikes are usually 3-4 miles in length and involve her chasing a ball ? in her mind the only reason for hiking. When other hikers or bikers without dogs approach, she is asked to go off trail, sits until they pass and is rewarded accordingly.

Almost every day I meet other people hiking with their dogs who are pleasant and whose dogs are cheerful and obedient. In all those years I have had only one unpleasant incident involving another dog. In that case, the dog was fiercely aggressive and went after my dog. I harshly criticized the owner for not leashing her dog and have never seen either of them again on my hikes.

I have never seen any dog chasing wildlife or doing anything that would damage the park in anyway; the dog owners I see ? and remember I am on these trails every single day ? are without exception respectful of the park and of others who are using it. We take great pleasure in these hiking experiences and know what is at risk if our dogs are not managed well.

By contrast, again on a daily basis, I see the effects of humans on the park. There is almost never a day when I have not picked up their trash on my daily walks. In addition, especially in the past two years, I am seeing the degradation of single-track trails by bikers. Some parts of trails are now so rutted and eroded it's difficult to walk on them. Most weekends I avoid hiking mid-day as I have almost been run down too many times to count by speeding bikers who seem unaware of the multi-use concept.

In summary, I would like to say that I suspect that my neighbors and I who use these trails every day have a better sense of what's going on than almost anyone else could have. I cannot see any justification for changing the current use guidelines for the Marin Headlands Trails and the idea of

fencing Oakwood Valley would despoil that park area far more than the current dog-walking.

I respectfully request that the current on-leash or voice control guidelines for the Marin Headlands Trails and Oakwood Valley Trails remain unchanged. Sincerely,

C. Christine Stuart Mill Valley, Ca. 94941

Correspondence ID: 857 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 15:47:11
Correspondence Type: Web Form
Correspondence: I do NOT agree on this proposal! The Marin Headlands and Muir Beach are my backyard, I walk my dogs on these lands everyday, and have yet to see any destruction of native plant species or any kind of disturbances between dogs and humans,in fact I have seen quite the other, dog owners are very respectful. Also, seeing what our state and federal economy is right now, I cannot imagine how you are going to fund the enforcement of this proposal! How and where do you expect the money to hire more rangers to come from??? I sincerely believe the public would like their tax dollars going somewhere else, maybe to our schools?! What a joke that our tax dollars are even paying for this proposal, and the time and energy you have put into it thus far! I am furious that this is my tax dollars at work! You should be embarrassed in this time of economic woe that you are worried about this!

Correspondence ID: 858 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: March 2 2011

To Whom it May Concern

I have for the past 11 years lived on the edge (WUI) of the GGNRA National Park at the trailhead of the Miwok Trail. I walk with my dog JAX both on the Headlands on a daily basis and on weekends at Muir Beach. In my many years of enjoying life in Marin with dogs and hiking with them on the NPS trails, my encounters both with dog owners and with dog walkers, has been incredibly positive and in all those years I have only had one negative experience. Most dogs on NPS land and beaches are very happy dogs indeed -well exercised and therefore mellow and playful. Relating with them is part of the wonder of living so near to the GGNRA and NPS lands and beaches. I have never seen a dog hunting or destroying any of the public

lands in anyway in all the years I have lived here and walked these trails.

I feel strongly that the singling out of dogs as the perpetrators of soil erosion and damage on NPS land is patently absurd. They no more erode the land and arguably do less damage than the myriad daily sightings of regular hikers, casual walkers, the 20 odd mountain bicyclists storming down the paths every weekend and holiday, the equestrians of the Miwok Stable, the runners of the meets held multiple times a year on NPS land, the families that pollute the beaches and leave trash in their wake, the fisherman that line up their rods on the rocks and the NPS contractors who have plowed up great furrows of earth, disturbed wildlife, destroyed dens and native plants and rearranged water courses in a vain attempt to right the wrongs of bad policy management made years ago and that similarly continue to be made today - and at what cost to the public coffers?

The absurdity of the current proposal to fund personnel to ticket dog owners to the tune of over \$1,500,000 a year is - in these times of recession cutbacks, threatened closures of parks and general neglect of existing parklands - an insult to tax payers and supporters of the NPS alike. Is this part of the management plan a simple revenue stream?

It is an ongoing battle to get some kind of sanity regarding the unfettered walking of our dogs. What is the point of all the training we do with our dogs to get them to be good citizens in their world if they and we are only to be rewarded for our efforts by being forced to walk them - unnaturally - on leash? Dogs must run and play and socialize and smell the earth and be allowed to be dogs. Dogs on continuous leash and not exercised enough are neurotic and very sad indeed...

Further, the proposed policy to restrict dogs only to certain areas will by definition force dog owners to congregate in very small areas which may in of itself cause problems and will create a false self-fulfilling prophecy currently engineered by the NPS that there are vast problems with dogs that require such draconian measures.

I urge the NPS to reconsider their plan and I request that the current rules relating to dogs - those of limited areas of leash control but mostly dogs under voice control - be upheld and left unchanged.

Thank you for your attention,

Betsy de Fries + JAX

Correspondence ID: 859 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 17:27:15

Correspondence Web Form

Type:

Correspondence: I would like to comment on the GGNRA Draft Dog Management Plan / Environmental Impact Statement as a non-dog owner that uses and enjoys the GGNRA off leash areas, specifically Fort Funston, Crissy Field, Baker Beach and Ocean Beach. Like many residents of San Francisco I am not permitted to have a dog in my rented apartment; a situation I'm not particularly fond of. I enjoy going to the dog walking areas of the GGNRA to hike, enjoy the beach and as an added bonus to interact with dogs. The GGNRA stands out from other federal lands in that it is a park in an urban area designed to meet the needs of urban residents, one of those needs is having a safe place to exercise and socialize companion animals. Please keep in mind when you talk about restricting dogs on GGNRA land you are actually talking about restricting the humans that accompany them. I feel quite strongly that the proposals to greatly diminish the off leash areas of the GGNRA is bad for the people of San Francisco, dog owners and non-owners alike. I try to imagine Fort Funston without dogs, the park and facilities are quite run down, it's often cold and foggy, close to an urban area, all I can imagine is an empty, run down park that without the many, many, dog walkers I probably would no longer feel safe visiting. Thank you, Kathy Hentges

Correspondence ID: 860 **Project:** 11759 **Document:** 38106

Received: Mar,02,2011 17:45:23

Correspondence Type: Web Form

Correspondence: This is ridiculous. Do you have any idea how many dogs there are in San Francisco and the surrounding areas? To decrease the size of the off-leash area is just unfair! I am a resident of San Francisco, and for the past 5 years I have enjoyed taking my dogs to Fort Funston and Crissy Fields. We venture through Fort Funston almost everyday, rain or shine. On weekends, we go twice daily. Hundreds of dogs play at Fort Funston everyday, especially on beautiful sunny days. I, as well as other dog owners, love that we have all that space to let our dogs roam free and play. I love chasing my dogs around. It's a great way for me to exercise them and to exercise myself since I am too busy to hit the gym sometimes. San Francisco is supposed to be a dog-friendly city. Please do not reduce our off-leash areas. There will not be enough space for our dogs to exercise.

This new plan is overly restrictive and not well-balanced. You cannot punish all the responsible dog owners because of the few bad ones. Dog owners and non-dog owners can co-exist and share the space. I have seen it at Fort Funston and Crissy Fields. The new plan severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason

for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA.

Correspondence ID: 861 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: March 3, 2011

To Whom it May Concern,

I am a long time resident of southern Marin and now a member of the HOA on Strawberry point: Strawberry Point Home Owners Assoc. (SPHOA). I oppose the full leash restriction of the BCDC open space area at Strawberry point: Strawberry Point Bayside Public Access Area.

After many years, generations of residents and dogs, a community was formed as they enjoyed this area. When developers approached the point this community of dog owners fought long and hard for open space and prevailed with the help of BCDC. Thank you! Now behind closed doors a handful of people initiated an approach to restrict the BCDC rules and historic use of this area. Yes, there was an accident and as terrible as that was after 30+ years that is not a bad record. Cars do speed down this road unchecked, boats far exceed the 5 mph speed limit in the channel along the point and bird refuge area, cars park after hours on the point, thefts have occurred, kids use alcohol at night on the Strawberry Point Bayside Public Access Area, and??? There are more than enough other things for the Sheriff to do here and in all of southern Marin.

Please don't take away the joy of off leash outside time with man's best friend. Off leash is necessary for dogs and as a community we have encouraged people to manage their dogs or to please take them somewhere else where they can run wild. With this scare of off leash these efforts will be heard, as no dog owner wants a leash law. There is a long time community who walks here which would have to go elsewhere if the leash law is put in place. Please allow us to continue to enjoy this property as we have and we will direct unruly owners and their dogs to another area away from people and dogs. Yes, our dogs do not even like other dogs to try to take over.

I will trust your conscience and good judgment, Linda Page

Correspondence 862 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,02,2011 19:16:48

Correspondence Type: Web Form

Correspondence: Please allow as much space for the people who have dogs. They need space to run and play. We need a lot less space & most of the dog people are very considerate.

thanks

Correspondence ID: 863 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,02,2011 19:38:04

Correspondence Type: Web Form

Correspondence: WARNING: TAKING AWAY LARGE OFF LEASH AREA'S WILL PRODUCE NEGATIVE AGGRESSION IN DOGS, PUTTING THE COMMUNITY AT RISK!!! I am a dog owner and I have lived in San Francisco for 10 years. I lived in a Jr. one bedroom apartment for the first five and a one bedroom apartment for the last five. I have very well balanced dog that gets exercise daily. It is extremely important that my dog and other dogs in San Francisco are given ample space to run in. Dogs need to be able to be off leash to run and play to expend energy daily. If you take away these off leash areas, I guarantee that there will be a rise in aggressive behavior in dogs around San Francisco. The argument based upon "preserving the environment" has no basis. Humans are much more damaging to the environment than any animal. Humans leave behind trash that will never decompose and most dog owners in San Francisco are very diligent in picking up after their dogs. I can understand that non dog owners would like to enjoy areas of the parks dog free, and I think that there is room for some compromise. However, I am strongly against taking away large off leash areas. I take my dog to Chrissie Fields weekly and the following is an example of what I feel would be a good compromise: If you are walking north/ west, off leash would be permitted after the small bridge; all along the beach, all the way down to the warming hut and also the large grass area on the left down to the warming hut. The first part of the beach (by the parking lot) would give people a dog free environment as well as the picnicking area by the warming hut, but dogs would still have ample space to run and play. I think that the individuals that want this law are not seeing the whole picture. It is good for the community to have large off leash areas and has very little damaging effect on the environment. If this law passes I believe that it would be putting the community at great risk for negative dog aggression.

Correspondence ID: 864 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,02,2011 19:55:52

Correspondence Web Form

Type:

Correspondence: I attended the meeting at Tam High this afternoon and discuss my views with Judy Walsh at some length. She encouraged me to submit my views, which follow. I would be happy to discuss them further at any time, with any NPS representative. You have my email address. My home phone is.

My name is Mark Trautwein. For 16 years, I was responsible for all national parks legislation and policy as lead staffer on the US House of Representatives Interior/Natural Resources Committees. In my tenure, we doubled the size of the parks system and tripled the wilderness system. The last legislation I managed established the Presidio Trust and completed the transfer of the Presidio to GGNRA. I say this to emphasize that I deeply respect the making of public policy and the difficult job of the NPS in refereeing fights between competing users of park lands, especially in urban environments. I devoted most of my professional life to the protection of park resources, and I'm very proud that I did. I think the Parks Service is one of the great institutions of American history and its mission is an intergenerational commitment. I represent no organization or interest.

Having said that, I also believe that the draft plan addressing dog management for the GGNRA is an abject failure. It makes the problem worse, not better. It resolves nothing. It is bad science and bad public policy. It is a betrayal of the best traditions of the Parks Service. This ponderous monster is built on a fundamentally false premise and represents a total failure of imagination.

That false premise is that in a place like GGNRA you can resolve differences between competing users by drawing lines on maps and imposing rules on those maps that say you can do this here but not there, you can do the other thing there but not here, except in the following cases, and you can't do any of it in this place and all of it in that place. It won't work. It is horrifically complicated, too hard for the average park user to understand. In this setting, lack of understanding breeds lack of respect and contempt, a sense that I'll do what makes sense to me, or worse, what I can get away with. That encourages people to violate the rules when no one is looking. You can't possibly police this yourselves ? it can only be policed by people who understand and accept the policy, and have a stake in its success. This plan creates none of those conditions ? in fact, it is a Petri dish of resentment.

Moreover, the aggrieved parties at this site or the other will continue fighting to amend the rules and the lines -- forever -- so its a prescription for unending grievance and conflict. The plan is an attempt to solve by map-driven fiat what can only be solved by better behavior.

Most fundamentally, the plan violates the first principle of ecology: that everything is connected to everything else, that we must manage everything on our landscape for the system that it is. This landscape in particular and everything on it includes people and their dogs. To chop and dice these lands into tiny bits and pieces is a 19th century management philosophy imposed on a 21st century landscape. It won't work because, by design, it can't. Ecology's first lesson is that everything must be regarded as a whole. To shove this problem or that group of users into one corner and that problem or this group into another corner is fundamentally unsound in this environment. It is especially true that trying to force dogs and their owners into spaces the Parks Service seems to regard as sacrifice areas will only breed bad dog behavior and worse human behavior. Instead of limiting space for humans and their dogs, NPS should be thinking of expanding it so the 'problem' can be diffused and the focus concentrated on the real problem ? human behavior.

Finally, the proposed program is a betrayal of the traditions of the Parks Service. It is written by a cop. The Parks Service is a lousy cop. At its best, the Parks Service is a teacher, and a terrific one. That's why people join the Parks Service. Cops can't solve this problem. Only teachers can solve it. It saddens me, really, to see what's become of one of the truly unique and special institutions ever devised.

So what do I propose instead of the current plan?

I would respectfully suggest that you rethink your entire approach here. Your problem is people. It is not dogs and it cannot be solved by your maps. Everyone must understand that we all need to respect each other for the different reasons we use these lands and behave accordingly. A truly ecologic approach would start with a premise that says people and their dogs are allowed everywhere, except places of truly critical environmental concern where neither people nor dogs are permitted. All dog owners are responsible for the behavior of their animals. That means that they are under control at all times and people are respectful of other park users and are partners in protecting park resources. The means of control are up to each owner and specific to each dog.

To demonstrate that you, as a dog owner, meet these requirements every dog owner using the park is required to have a permit issued by the NPS, issued after successful completion of a program designed, constructed and operated by NPS in conjunction with relevant and responsible local organizations. That program will teach dog management and control, as well as knowledge and respect of park resources and the others who use and enjoy them. Upon completion of such a program, people and their dogs would be certified to enjoy the park ? with or without leashes depending on their ability to control

their animals.

I fully understand that there are many details that would have to be developed to realize such a program. It would take time to implement, in phases. But in the end the only lasting solution to this problem is better human behavior -- more educated about people, about dogs and about the environment. Your plan is designed to fail ? to create winners and losers, angry and resentful constituents with no interest in seeing the plan succeed. My plan has the potential for the opposite ? creating an army of users with a stake in the plans success and a stake in being the enforcers of a policy that both protects park resources and accommodates park users.

Why not design a regime that addresses your real problem, human behavior, that is simple to understand and will succeed, instead of one with a proven track record of failure?

What you are doing won't make life better for people or dogs, won't make life better for all the other users of the park, won't make life better for the ecology of that park that we all cherish and have such a profound responsibility to respect, and, frankly, won't make life better for you as park managers, either. There is a better way, rooted in the traditions of the Parks Service and the truth of what ecology means in an urban setting.

I beg you to have the courage to choose it.

Mark Trautwein San Anselmo, Ca. 94960

Correspondence ID: 865 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 20:08:52
Correspondence Type: Web Form
Correspondence: I oppose the planned restrictions on "off-leash" use of the GGNRA.

Correspondence ID: 866 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 20:54:59
Correspondence Type: Web Form
Correspondence: I have reviewed and support the preferred alternative plan for GGNRA Draft Dog Management Plan/Environmental Impact Statement. I believe the preferred alternative plan promotes responsible dog ownership while protecting the environment and access for people for years to come.

Correspondence ID: 867 **Project:** 11759 **Document:** 38106
Received: Mar,02,2011 23:26:59
Correspondence Web Form

Type:

Correspondence: I do not understand why there cannot be areas of each park that are dedicated to dogs off-leash. It would seem reasonable to pick an area that would cause the least amount of environmental destruction BUT would allow dogs to get the exercise they need in order to be balanced and happy. Not all of us are able to walk our dogs, on leash, the time and distance that would render them submissive and healthy. Getting to run and play is so much a part of a dogs social life that without it, we're liable to see more dog aggression and bites, which leads to fear of dogs, which generally leads to MORE bites.

Dog walkers provide a huge, important service to city-dwellers who DO have to work outside of their homes. Perhaps a licensing program is due. A training program through AC & C that they'd have to pay for. That could teach better dog handling.

This city could benefit from a lot more emphasis on teaching it's "new to dog ownership" how to be better and more responsible dog owners.

What about dog owners getting permit to actually have their dogs off-leash? Couldn't AC &C benefit from a training program that citizens have to pay for if they want to use this service???

Certainly there are more creative answers to these issues than simply banning dogs off-leash. I certainly cannot ever support the punishing of responsible people/dog owners because of the actions of a minority who cannot understand how important it is to be a responsible member of our society.

Hell.... we need a license to drive a car, be of age to drink & vote & smoke. Why not have a licensing program for being allowed to have your dog off-leash? I realize it would mean some enforcement, but a citizens group is worth talking about. I know many dog owners who would be thrilled to be empowered by the city to tell an irresponsible dog owner to "clean up the waste" OR that "this area is on-leash and that area is off-leash". Community groups can work if they are allowed to.

Please try to deplete all avenues BEFORE cutting off this important asset to us responsible dog-owners.

Correspondence ID: 868 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 08:27:59

Correspondence Type: Web Form

Correspondence: Dogs make dogshit and scare / hurt kids. Owners of dogs are arrogant and

insensitive. I'm sick and tired of hiking on trails littered with dogshit and little bags full of dogshit left for others to clean up.

No dogs....

Correspondence ID: 869 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 08:36:27
Correspondence Type: Web Form
Correspondence: My brief review of your potential plans -- indicates an approach that attempts to put reasonable restrictions on the use of the beach. Prior to scanning this information - I was under the impression that it is an "all or nothing" plan. I understand we must balance public safety & protection of our public lands with freedom and responsibilities. Prior to my six year old Border Collie, I rarely went to the beach. The joy and beauty I have experieced - through the frolicking freedoms on the beach is spirit lifting. To take this away - entirely - would be a grave injustice and a loss of freedom that America proudly stands for. I hope we can find the common ground for the common good.

Correspondence ID: 870 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 08:55:36
Correspondence Type: Web Form
Correspondence: I strongly oppose this measure and believe that dogs should be able to be off leash....if they are causing problems then allow for strong penalties for owners who dont have good control of their dogs. Essentially, uou are protecting one species ability to be active and limiting the abilities of dogs to run and play...especially true for those of us who live in a city where our escapes to nature include bringing our dogs so they can run and play.

Correspondence ID: 871 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 09:00:00
Correspondence Type: Web Form
Correspondence: I support the new restrictions on dogs in GGNRA. As a hiker and supporter of the natural environment, I don't want dogs running loose, potentially posing a threat both to wildlife and to humans enjoying the outdoors.

Correspondence ID: 872 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 09:09:59
Correspondence Type: Web Form

Type:

Correspondence: No changes to the park system for dogs. Leave AS-IS with current laws, rules, regulations, etc.

Correspondence ID: 873 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: People and dogs belong together, and have for over 100,000 years (Temple Grandin). When you ban or restrict man's best friend from the very places we support, love, and visit for personal nourishment, we become victims of an ecological Orwellian era. The power and influence of the Audubon Society is great and deserves gratitude and recognition, but lest we not listen to mistakes from the past, it should be limited. Do not alter the course of joy and love, at a time when personal escapes are limited.

Correspondence ID: 874 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 10:15:16

Correspondence Type: Web Form

Correspondence: I support the most restrictive policies towards dogs on GGNRA lands.

From my experience (despite dog owners' assurances), there is no such thing as effective "voice command" when a dog is excited by other dogs or the appearance of wildlife.

Our visits to Muir Beach in particular have been marred by having to be on the constant lookout for dog feces underfoot and by unleashed, uncontrolled dogs running through our picnics.

PLEASE PROHIBIT DOG ACCESS TO GGNRA LANDS WHEREVER POSSIBLE.

Thank you.

Correspondence ID: 875 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: What harm do well-behaved dogs do in these areas? I see no evidence that requires restrictions, that others are endangered. Shouldn't substantial and compelling evidence be required before limiting our freedom?

This is also a quality of life issue. People are allowed to go virtually anywhere, indoors and out, yet dogs are limited. Public space belongs to everyone, and pets and pet owners should not be deprived of their rights without serious reason.

Correspondence ID: 876 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 10:52:16

Correspondence Type: Web Form

Correspondence: I am a disabled gay senior citizen and the primary exercise I can do is walk my dogs off leash. I am unable to walk them on leash due to my disability. My dogs give me the motivation to exercise which my doctor says is necessary for my well being. I have been walking at Ft Funston for 20 years. These areas were established by Congress for recreational areas and should be kept that way in our highly urbanized area. Off leash dog walkers are the primary users of some of these areas and our presence keeps out unsavory eliminates like gangs and homeless. There is no scientific evidence that dogs harm the snowy plover or any other birds. People with their littering cause more damage to the environment than the dogs do. A well-exercised dog, is a well-behaved dog. Available off-leash areas are already scarce.

An alternative is needed like the A+ plan. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and education where problems arise. There must be off-leash access in San Mateo County and on new lands as they come into the GGNRA. Off-leash recreation is a traditional use of those lands, and it must be respected and maintained. That is in keeping with the GGNRA's mandate for the "maintenance of needed recreational open space" contained in the legislation that created the GGNRA. The restrictions on access for people with dogs contained in the Preferred Alternative are not warranted. They cannot be used to justify a fundamental violation of the recreational mandate that formed the reason the GGNRA was created.

There is no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife. Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they

expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impacts. The GGNRA's own data show that off-leash dogs have no impact on the numbers of snowy plovers, a threatened species that roosts only (does not nest or raise chicks) on relatively small parts of Ocean Beach and Crissy Field. The GGNRA's own studies show that joggers and walkers, not to mention parents with toddlers, equestrians, surfers, and other park users "disturb" plovers, yet there is no attempt to restrict their access in the plover areas.

Off-leash dog walking is the most diverse recreation activity in the GGNRA, enjoyed by the widest variety of people ? seniors, kids, the disabled, every ethnic group, every sexual orientation, and every social and economic class. The military planted huge amounts of ice plant to stabilize the sand dunes at Fort Funston and elsewhere. Standards of management that treat much of the GGNRA, especially those parts in San Francisco, like pristine wilderness are misguided.

Correspondence ID: 877 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 11:00:36

Correspondence Type: Web Form

Correspondence: To whom it may concern,

As long-time residents of Marin, my wife and I as well as all of our friends and neighbors are appalled by these new proposed restrictions. We are dog owners and have happily used the beautiful trails in the area for almost 20 years. Our dogs have always been under voice control or on leash, and we have had no problems with our dog or other dogs. Part of the lifestyle here and of central importance is that our dog and many others have some space for running and being free.

We are also staunch conservationists and feel very protective of the forest, trails and open spaces, and are very careful to watch our dog. I have never seen any damage to the land or other creatures. These proposed ordinances make no sense- don't seem to add any protection to the area and feel very punitive to us dog owners and nature lovers who use and love these spaces. I have not seen or heard any sensible rationale for the proposed changes. All the dog owners we know are very supportive and careful about their use of the land.

We strongly urge to reconsider the ordinances.

Thank you, Glenn Fleisch

Correspondence ID: 878 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 11:11:10

Correspondence Type: Web Form

Correspondence: I regularly visit these park areas with my dog and am aware of both sides of the issue. On the one hand the wear and tear on the landscape, annoyance to those without their own dogs, etc. And on the other people and dogs that need a place they can let it out have fun and enjoy the landscape. I believe that without restricting dogs and their owners completely we can still accommodate everyone. Perhaps a permitting system for dog owners where they pay a fee/day. The fees would then be used to restoring, reinforcing habitat and other duties as the community requires.

Correspondence ID: 879 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 11:27:40

Correspondence Type: Web Form

Correspondence: I support (100%) your decision to have dogs on least at all times. I am a lifelong dog owner and love them, but they belong on leash unless they are in your home or a regulated "dog Park".

I am tired of having dogs (not my own) jump on me, run at me, lick me, sniff me, all the while their owner saying they are harmless, voice controlled.

I am also an avid hiker and it saddens me to see wildlife frightened by "controlled" dogs.

If Owners can not be responsible on their own, then it needs to be government mandated.

Thank you.

L. Greer

Correspondence ID: 880 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 11:27:43

Correspondence Type: Web Form

Correspondence: Bringing the GGNRA into the same standard as remaining National Parks is a good thing. I can't imagine we would allow unrestricted dogs in Glacier, Yosemite or Bryce Canyon. Proximity to the urban environs brings a

slightly different demand. However, dogs are not people. And people always assume they can control their dogs by voice - and many cannot. Or will not. I have had to limit my use of the park because of the 25% of owners who do not control their dogs. I want clear and enforceable standards at each setting and this document tries to do that. And then I want them enforced with tickets and cost. Lastly, I wonder why we are compelled to provide a venue for commercial operations - dog walkers. We restrict oyster farmers, farmers in general, anyone who is commercially viable, yet we allow commercial dog walkers. This I dont understand.

Correspondence ID: 881 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 11:36:38
Correspondence Type: Web Form
Correspondence: I am individual who is not a dog owner. However I enjoy the dogs on the beach. I think it would be a shame to keep dogs off of Muir Beach.

Thank you.

Correspondence ID: 882 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 11:55:25
Correspondence Type: Web Form
Correspondence: Dear GGNRA --

As a responsible dog owner in San Francisco (and one who encourages it in others as well) I am writing to share with you my objections to the new dog plan. I will be attending the meeting on March 7th and have called my supervisor as well to register my objections.

I have always said what a wonderful city SF is for dogs and their people. The walks and hikes we take together on the paths are good for both of us. Certainly there are people that abuse their right to walk their dogs off-leash (we don't like that either) but for the most part, we are responsible and caring.

I cringe at the thought of limiting our dog time to dog runs (where actually more aggression is shown between dogs) and on-leash walks. Think about the increase in the amount of dogs in the allocated park areas creating crowded spaces and probably even more opposition from non-dog owners.

And let's not forget the sheer joy a dog gets running freely after a ball or romping with a pal. Healthy, happy and well-exercised makes for well

adjusted dogs (just like for people).

Again, for those of us that care deeply about our city and our animals and being responsible citizens, this plan that's on the books would be an unwelcomed change to our community. Please reconsider the plan! Thanks for your time and attention. Winn Ellis

Correspondence ID: 883 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: At the meeting in Mill Valley yesterday, one of the GGNRA biologists stated that habitat impact was the least important factor in limiting dogs in the park!

Correspondence ID: 884 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 12:17:42
Correspondence Type: Web Form
Correspondence: Please keep all pets out of national parks of all kinds. They are a danger to other citizens, children and wildlife, and do not belong in our parks.

NO DOGS IN NATIONAL PARKS.

Thanks!

Correspondence ID: 885 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 12:21:03
Correspondence Type: Web Form
Correspondence: I am a resident of San Francisco of Asian descent and I am a regular and responsible user of the GGNRA. My dog frequents GGNRA parks 5 days per week, on average. He is under voice control when off-leash; I leash my dog when needed for his safety or the safety of others, and I always pick up after my dog.

With respect to the Compliance-Based Management Strategy in the GGNRA, I strongly disagree with the proposal to change the status of park access, if compliance is not 100%.

The 'Preferred Alternative' plan is far too restrictive in restricting off-leash access to the parks listed, and with the threat of banning dogs altogether in

other parks.

It is unjust and unfair to penalize all responsible dogs and dog owners due to the actions of a minority few who may not comply with regulations. I would like to see enforcement for dog owners to comply with guidelines - punishing or restricting access to dogs.

Correspondence ID: 886 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 12:45:06

Correspondence Type: Web Form

Correspondence: I have a 5 year old Border Collie and I take him to Rodeo Beach in the Marin Headlands every Saturday to run around on the beach. He has never had an incident with another dog, person, surfer, bicyclist, or hiker. I pick up behind him always and am a responsible dog owner. My dog, Domino, can sit, stay, heel, come, and lie down on command - I would say that he is more obedient than 80% of the kids I see running around the beach.

I strongly disagree with the GGNRA proposed change to dog friendly areas and leash laws. I'm pretty sure there are more effective ways of protecting habitats than by removing dogs from the equation.

Dogs don't leave empty soda cans and water bottles behind, dogs don't pollute the air with their cars, dogs don't traipse over vegetation with bicycle tires and hiking boots - so why punish them and their owners?!

Keep the beaches open to dogs under voice control! Increase the fines and punishment for people who litter if you want to make a positive impact, but do not change leash laws and keep our beaches open to friendly dogs.

Correspondence ID: 887 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 12:51:02

Correspondence Type: Web Form

Correspondence: Greetings GGNRA, I attended the public meeting at Tam H.S. last night. First off, let me say that all the Park Rangers and GGNRA representatives were very pleasant, patient, and engaged in open dialogue. I came to the meeting concerned that this plan was a fait accompli and that the meetings were just for show. Having now spoken with a number of people there, I am cautiously optimistic this is not the case. You know we love our dogs so I am doing to focus on the pragmatic issues I see instead of the passion I feel about this. Specifically with regards to Ft. Funston where I have been taking my dogs for 9 years and know like the back of my hand. My main issue is that your map if taken at face value could be misconstrued as providing a

generous amount of off leash area when in fact the area chosen is problematic in many ways. Primarily, the beach at Ft. Fun is very difficult to access. You either need to walk down/up an extremely steep/sandy/logged path followed by challenging access up/down from the beach. Additionally, after certain bad storms access has been impossible and much garbage has been on the beach as a result of sewer issues and tides. Also, during certain times of the year especially in the summer there are a lot of dead creatures (crabs, birds, sailfin jellie fish, even sea lions) which pose public health issues due to disease and decay. The other beach access point is at least 1/2 mile from the parking lot with another steep (albeit shorter) hill to access. This is going to limit those with any physical issues be it age, cardiac related, musculoskeletal issues etc. The other area up above the beach adjacent to the parking lot is primarily dunes with no discernible paths that also will be very difficult for people to access due to uneven ground and will increase the chances of injuries. Lastly, the weather in general at this park is not conducive (probably 360 days out of the year) for activities such as having a picnic, going to the beach for sunning etc. In the both the winter and summer months you will likely find me bundled up in fleece and down with hat and gloves and/or rain gear. The folks at Ft. Fun are excellent caretakers of this land - monthly 'depooping' is a mainstay and bag boxes have been put in place by the folks who go there as well as a contractor did work around the water fountains to cut down on the mud and standing water. I love all animals and want to protect those in danger - so put up better fencing to keep dogs and people out of the areas which are eroding if needed. If you need a place for school kids, how about making an area over by the ranger building and blocking dog access over there. From the parking lot north I believe access should remain off leash for the reasons I have identified and so more not the least of which is safety and equal access to all despite age or infirmity. I would be more than willing to be a part of any discussion group that includes the public to try to come up with solutions and ideas that will be equitable and fair. I thank you for time and efforts. Sincerely, Leigh Page

Correspondence ID: 888 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 12:53:18

Correspondence Type: Web Form

Correspondence: This effort by NPS is extremely disturbing and a waste of taxpayer money. I hike on park service trails all of the time and have never seen an issue with dogs on leash or off leash. This is not a significant problem. The additional beuracracy you're creating is ridiculously costly and infringes on the rights of a large portion of park users.

Correspondence ID: 889 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 13:03:20
Correspondence Type: Web Form
Correspondence: Hello,

I would like to register my support for restricting off-leash dogs in GGNRA. My recommendation would be to have a few clearly marked areas where dogs can run off leash while enforcing off-leash laws in other areas.

I cannot count the times that I felt threatened by aggressive off-leash dogs or seen dogs digging or chasing wildlife. Off-leash dogs are making some areas of GGNRA less usable by those without dogs.

Ocean Beach, for instance, is several miles long in San Francisco. That entire area does not need to be an off leash area. Put up some ropes. I think that the Cape May area of New Jersey does a pretty good job with this for comparison. I have never been chased by a dog there, and the one person whose dog chased some birds actually seemed embarrassed by the incident.

Correspondence ID: 890 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 13:31:07
Correspondence Type: Web Form
Correspondence: I am a pro-dog advocate, and avid political activist.

Those dog-owners who respectfully use such Federal recreation areas, such as Muir Beach, Rodeo Beach, and the Marin Headlands, deserve to continue the tradition. Many people have moved to such areas because of the advantages of freedom from excessive control, to allow their family members - dogs - to enjoy limited freedom.

It is fair to have limitations - for all areas, dogs should be on voice control. All owners should be required to carry with them dog poop bags, and clean up. I understand there's a permit system used for civil dog owners in Boulder Colo which could be adopted.

Merrill Nisam MD

Correspondence ID: 891 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 13:31:51
Correspondence Type: Web Form
Correspondence: Please do not ban dogs from federal park areas in Marin, or require them to be on leash. They do need to be under voice control.

Correspondence ID: 892 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 13:45:21

Correspondence Type: Web Form

Correspondence: Although I do not live in San Francisco I do visit quite often. The main reasons that I visit are to visit a dear friend and to take our dogs to Fort Funston. Abolishing off leash hiking will effect countless people and their pets. I have seen every type of dog there and every age person, from small children to the elderly. Dog-owners are very respectful of each other, others dogs, and the environment. Dog excrement is picked up conscientiously by all. Rarely do dogs poop on the beach and if so it is quickly picked up. Dogs do not poop in the water, it's just not their thing. If there are endangered species I have yet to see them and dogs are more interested in each other than any animals or birds they might see. If anything is interrupting the "soundscape" it would be the constant noise from nearby cars and the rifle range. I believe that if a person is afraid of dogs they would not visit this park, especially when there is so much ocean front available for others to enjoy. Fort Funston and Crissy field represent less than 1% of all GGNRA land. With 100,000 dogs in San Francisco alone, one would think this 1% would be fair. This area is considered a National Recreation Area and is not a National Park. I strongly oppose GGNRA's Dog Management Plan for Fort Funston. The beauty and joy of dogs running free is a joy for all. Walk around San Francisco and then walk around Fort Funston (with or without a dog) - at the dog park smiles abound, strangers converse, friendships are made, multi-generation experiences enrich the lives of all. Please leave Ft. Funston alone. Thank you for your consideration of my letter.

Correspondence ID: 893 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 13:51:22

Correspondence Type: Web Form

Correspondence: Keep the dog parks open to allow out pets to exercise off leash in safe environments.

Correspondence ID: 894 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 14:20:02

Correspondence Type: Web Form

Correspondence: I have been using the Fort Funston/Crissy Field area to walk my dogs for years. This area was designated as a place for all uses initially and there is no logical reason for it to change.

This "Dog Plan" is another attempt by GGNRA to move these green spaces

away from recreation use and towards preservation, which reduces uses for people too. These "recreational areas" were originally so designated by congress for urban areas and intended to be multi use.

The "Poison Pill" of a "Compliance-Based Management Strategy" is unfair since it can only reduce off-leash access and not increase access in the future, and is an attempt to circumvent the legal requirement of a public process when management changes that are significant or highly controversial are made. It will not work and must be removed.

Please respect the what the area was initially intended for. You are here to provide the public the ability to use these areas in a respectful way. That is where your focus must be.

Correspondence ID: 895 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 14:26:36

Correspondence Type: Web Form

Correspondence: Unintended consequences MUST be taken in to consideration when creating policy change that will affect human and canine citizens of the bay area. The plovers and children DO need to be protected from dogs, and some dog owners and walkers are irresponsible and inconsiderate However, by restricting the areas in which dogs can run, free of leashes, and maximizing the areas of leash restriction, the new policy could create unforeseen problems. Dogs, like humans need space and exercise. A poorly exercised dog is much more likely to misbehave and create problems for people and other dogs. By minimizing the area in which they can run free, the GGNRA may create problems they are trying to prevent. Will GGNRA help animal shelters which could see a large increase in owner surrenders?

Suggestions are as follows: 1. Require all dog owners and businesses to purchase a low cost permit to help fund GGNRA. The permit will include an agreement to pick up and dispose of dog waste and to honor boundaries of the plover territory. 2. Fine those who do not pick up waste. 3. Understand that this National park IS unlike any other, due to its urban setting, population density, and excerpting the plovers, has minimal potential for negative species interaction. How can dogs be a greater detriment than snowmobiles, cars, and ATVs, all of which are allowed in our National Parks? Thank you for your time

Correspondence ID: 896 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 14:29:21

Correspondence Type: Web Form

Correspondence: Hello, I am writing in favor of keeping dogs off leash in National Parks, such as Muir and South Rodeo Beaches. I have two dogs myself, who I love to take to any place they can run free, which is getting fewer and far between. Why is it that all other animals on this planet, can utilize their god given right to run free, except for dogs and/ or any unfortunate animal in captivity? Please save our freedom to take our beloved pets to the park and run free!!!!

Sincerely,

Diana Scheer of Novato, CA.

Correspondence ID: 897 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 14:31:48

Correspondence Type: Web Form

Correspondence: As a runner and hiker who frequents the trails and beaches of GGNRA, I support in the strongest terms, current leash laws. In fact, I strongly support expanding "no dog" areas within the GGNRA. It has been my experience that more often than not, the dog owners in the GGNRA are irresponsible. They do not heed the "no dogs allowed signs", nor do they keep their pets on a leash as required in areas where dogs are permitted. When I have reminded dog owners that their off or on leash dog or dogs are not permitted on the trail where I encounter them, I am at best ignored, or at worst, cursed. On a number of occasions I have had to defend myself against attacking unleashed dogs by employing a stick or water bottle as a club to threaten the attacking dog. On one occasion, I was bitten. That dog owner blamed me (I had not defended myself in any way, nor had I threatened the dog in any way), and stated that her dog had not previously bitten anyone.

The idea of "voice control" in lieu of a leash is ludicrous. I have yet to observe a dog that is 100% responsive to voice commands. If such pets exist, clearly they are not represented by those I have encountered in the GGNRA. And the idea of "dog walkers" permitted to bring multiple pets on or off leash is equally absurd. On a number of occasions I have encountered groups of dogs on single track trails running ahead of their "master" some 200 feet, and out of sight of said master. Where is "voice control" or any control for that matter in these situations? Dogs belong on a leash, and not on single track trails even on a leash.

Regardless of what decision is ultimately reached by the GGNRA, the most pressing issue is lack of enforcement to existing regulations. Virtually every weekend in the Tennessee Valley area, I observe dogs on the beach and on the road between the parking lot and the beach off leash. And rarely, perhaps twice a year, do I see a ranger patrolling these areas on weekends.

However, I do see rangers on occasion during the week, when the number of errant dogs and dog owners are few and far between. Bottom line: please get rangers to patrol the Tennessee Vally area on weekends. Also, please post LARGE "NO Pet" signs by the gate near the Tennessee Valley parking lot.

Correspondence ID: 898 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 14:45:27

Correspondence Type: Web Form

Correspondence: I have been in these areas many, many times, and found immense joy in the dogs on the beach. I have seen responsible pet owners pick up after their pets, and show people how to interact with them. I have never ever seen any bad behavior that was not swiftly taken care of, and I have rarely even seen any bad behavior. this area needs to remain off leash as one of the few areas like this for dogs to have this sort of recreation.

Correspondence ID: 899 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 14:47:23

Correspondence Type: Web Form

Correspondence: I appreciate a ban of dogs on beaches and leaching being required. I am not a dog fan and do not frequent the parks anymore because of the dogs. I do not feel they are safe enough to visit them with my small child because of the dogs. It's disgusting how many owners do not have control of their dogs, letting them kick up shore birds etc and then do not pick up after them. Im sure the already stressed shorebirds love the happy dogs. Dogs need to be in full control and the ONLY way to guarantee that is full leash all the time and the removal from many areas.

Sincerely, Eric Helmgren

Correspondence ID: 900 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 15:04:44

Correspondence Type: Web Form

Correspondence: My comments are to encourage you to enforce a leash law/requirement at Crissy Field. I have been doing my daily walk here for many years and here are a few things that I witness each day.

I have been attack or tripped during my walk several times. I see dogs attacking other small dogs, running in the habitat area, the lagoon, and generally ignored. The 25% of people who use a leash, or closely monitor their dogs are doing a good job, but the problem is the other 75% that do not

give that attention.

People walking and talk with others or on the phone, joggers, and cyclist, will get far ahead of their animal and have not idea of what the dog is doing. I have seen people so far ahead that they do not know where their dog is. They will look back, maybe call a name, but then just continue on their way as the dogs does all the things I have mentioned as well as leaving their poop that does not get cleaned.

It is usually the big dogs that are ignored, the small dog owners seem to use their leash or have the small dog with them and monitor them more closely, but the big dogs just run wild and do whatever they want. I have even had people get angry with me because I tripped over their unattended animal. I'm a senior, walk with a limp and really do not want to break a bone because someone does not care what their dog does to someone else.

Please enforce a leash requirement for Crissy, it will improve the safety and sanitation of the area that the majority of non-dog owners like to enjoy for their daily excercise. There are many people just like me that feel this way because they have also been attacked or triped, etc. Please give a leash law for everyone enjoyment. Thank you

Correspondence ID: 901 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 15:34:46
Correspondence Type: Web Form
Correspondence: PLEASE KEEP ALL AREAS OPEN TO OFF-LEASH DOGS!!! If anything, additional areas should be created. These areas are for 'recreation', removing the ability for people to take their dogs, essentially removes an area for people to 'recreate', since dog owners prefer to do this in conjunction with their pets. What's the point of setting aside 'recreation areas' if the end result will be that less people will use and enjoy them?!?

Correspondence ID: 902 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 15:47:50
Correspondence Type: Web Form
Correspondence: We visit Ft. Funston regularly with our Labradoodle and kids, and before kids we brought our Siberian Husky. Many dog breeds need a place to run to get sufficient exercise, especially City dogs. Please don't take this off-leash privelege away from those who love Ft. Funston, and love dogs who can run free.

Correspondence 903 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,03,2011 16:03:08

Correspondence Type: Web Form

Type:

Correspondence: Please keep Marin County Open Space areas open to dogs off of a leash. Marin is a dog friendly community and we need to keep areas open for responsible dog owners to be able to take their dogs to run free off of a leash. There is enough control in this world, please don't take this away!!

Thank you!

Correspondence ID: 904 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,03,2011 16:06:30

Correspondence Type: Web Form

Type:

Correspondence: RE: Proposed dog ban on Muir Beach.

It is unfair and unlawful to exclude an entire group due to the bad behavior of a few. For example, we see many parents allowing their children to trample on the dunes and swim in the lagoon, but would not expect children to be banned from Muir Beach altogether. Or bikers who come barreling down the trail and run hikers off the road. It would not be fair for those few to ruin it for all of the rest of responsible bikers/parents/dog owners who wish to enjoy the lands supported with all of our tax dollars.

And for those who truly wish for a dog-free experience, there are many, many trails and beach areas that already offer that. In fact, most trails which border Muir Beach already do not allow dogs -- off leash or otherwise. Muir Beach and the Coastal trails are 2 of the last remaining dog-friendly areas in Marin.

In terms of enforcement, it doesn't make sense to spend almost 1 million dollars to enforce new rules when no efforts have been made to enforce the rules that already exist. All of the measures suggested to enforce the new rules (education, signage, ranger presence, fines) should be tried with the existing rules before implementing these overly restrictive measures.

In terms of environmental impacts of dogs, no hard data or monitoring studies have been performed to prove that dogs are any more harmful to sensitive wildlife areas than people. Without this evidence, it is unfair and unlawful to exclude dog owners from public lands.

Dog owners deserve to the right to responsibly recreate on these lands with their pets. NPS should support this right with appropriate enforcement of existing rules for ALL visitors to Muir Beach.

Correspondence ID: 905 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 16:48:10

Correspondence Type: Web Form

Correspondence: I am happy with the proposal, which indicates that in most cases dogs will be required to be on-leash. My daughter is very fearful of dogs that are off leash. Even if they are friendly, if they approach her it can ruin our entire trip. Dogs are unpredictable; there is no guarantee of effective voice control in all situations. Please continue to support on-leash requirements.

Correspondence ID: 906 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 17:24:43

Correspondence Type: Web Form

Correspondence: I support the leash plan for Milagra Ridge. As a Site Steward at Milagra, I was involved in developing the first management plan for Milagra and the first trail planning. I have put in many volunteer hours at the Ridge and consider myself very fortunate to have helped protect and preserve it. I am very aware of the sensitive areas and the wildlife that live at the Ridge (coyotes, deer, bobcats, fox, skunks, raccoons, Great horned owls, and many other birds). We also have Red Legged Frogs, several varieties of snakes including California red sided garter snake and possibly may be home to the San Francisco garter snake. Milagra Ridge is an area that must be protected for future generations. I actually live at the Spyglass Ridge HOA inholding at the Ridge. I have two dogs (Scottish Terriers) that I walk on leash at the Ridge every day. I have had problems with off-leash dogs in several ways: (1) Interfering with and harassing my dogs and me, (2) Harassing/chasing wild life, (3) littering the trails with feces, (4) running through sensitive areas, (5) approaching non-dog walkers who are fearful of dogs.

I believe in leashing my dogs to protect them from many hazards. Years ago, in the countryside/farmland of Massachusetts I had dogs that ran free. But, we have a different environment today. Dogs that run free can encounter many hazards from traffic, theft, poison to name a few. I care for my pets and want to protect them from potential hazards in our area.

I also believe that many dog owners and potential dog owners do not take their environment into consideration when they choose a dog breed. City dwellers that choose pets that require a lot of exercise and training do not think about where they will be able to exercise their dog without interfering with park use by non-pet people. They also do not consider how to protect their dogs against environmental hazards.

Thanks for the opportunity to comment on the proposed changes to the current leash law in my area.

Correspondence ID: 907 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 17:58:01

Correspondence Type: Web Form

Correspondence: Dear National Park Service,

I urge you to maintain Fort Funston and Ocean Beach as off-leash dog parks. They have been used as such for many years and have come to be relied upon by dog owners, such as myself for our use and enjoyment. There are already plenty of parks where off-leash is not allowed and not an option and personally, I am fine with this. Please leave things status quo.

Thank you,

Claudia Chamberlain

Correspondence ID: 908 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 18:06:41

Correspondence Type: Web Form

Correspondence: I support the NPS preferred alternative for the GGNRA Draft Dog management plan. As a Mill Valley resident and daily user of many of the designated trails and recreational areas, I have had an ongoing concern about the environmental / wildlife damage done by dogs. Even in areas currently designated as leash required, I encounter more off-leash dogs than on-leash dogs. I see them scampering into the woods, chasing birds and critters - clearly not even under voice control. How many dogs respond to voice control when they're chasing something? I love dogs, and understand the need for places for them to run free -- but sensitive environmental areas are not appropriate. I believe that the preferred plan provides sufficient dog resources on public lands.

I am also in support of the preferred alternative for dog walking limits and dog walker licenses. It is not uncommon to see a dog walker with more than 6 dogs on the Oakwood Valley and Alta Trails -- with only a few on-leash. And then there are the poop bags that line the trails -- yes most dog walkers pick up after their charges, but they frequently just leave the poop by the side of the trail. This practice should be addressed in the licensing requirements.

Unfortunately, since many dog walkers don't follow the current rules, what

incentive is for them to follow the new rules? I hope the rules come with some meat for enforcement!

Thank you for considering my comments on this plan.

Correspondence ID: 909 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 18:18:38
Correspondence Type: Web Form
Correspondence: I live in Marin County, and my family has enjoyed the use of the beaches and the trails for years-with our dogs. These are outdoor areas that should be shared with everyone, including animals. Horses are allowed in these areas, but you want to keep dogs out..?? I believe there are better ways to use our tax dollars and the agencies' time. Please don't ban dogs from these areas. You would be affecting so many families and children, as going to these outdoor areas with their family pets, i.e. dogs, is a weekly and sometimes daily family past time. Please reconsider.

Correspondence ID: 910 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 18:31:39
Correspondence Type: Web Form
Correspondence: I am writing to express my support for greater restrictions on dogs on GGNRA lands. While I appreciate the needs of dog owners, I think the priority for the park lands needs to be on preserving habitat for natural species and for use that is not disruptive of other's enjoyment of the lands. In many parts of the GGNRA, the number of dogs and their impact have a significant negative impact.

Thank you for your work on this.

Correspondence ID: 911 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 18:33:41
Correspondence Type: Web Form
Correspondence: Please enforce the law and fine those who put themselves above the law. Wild area should be preserved for wildlife. I've seen birds, bobcats and rabbits chased. I've been bit, my daughter was bit when I held her above my head.

Correspondence ID: 912 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: I moved to San Francisco in 2005 with my one-year-old golden retriever, Clementine. Since then my husband and I have adopted another dog, Ellie. Before coming to San Francisco, I've lived all over the country. One of the most remarkable qualities about San Francisco is its proximity to stunning natural environments. But what I love most about this city is its residents' willingness to coexist, to let each other pursue the lifestyles and passions they love without animosity. Part of the San Francisco lifestyle is dog ownership - I know of no other metropolitan area in which as many people own dogs and, in particular, as many people are concerned about the welfare of needy animals. Perhaps that's the most difficult part of these proposed rules: they are intended to protect other needy animals (butterflies, etc.), a cause that many of the dog owners upset by the rules want to support as well. In the end, I come back to the principle that makes this city so unique: coexistence. Certainly there is a way to balance the interests the proposed rules intend to advance and the happiness and welfare of San Francisco's dog-loving community. The three that immediately come to mind are (1) more narrowly drawing the no-dog/leash areas; (2) more strictly enforcing responsible dog owner rules (e.g., tickets for failure to pick up after your dog); and (3) limit the number of dogs that a single person can bring into the area (this would limit the problem of a single dog walker bringing 12+ dogs into an area at once and being unable to keep track of them all, (which by the way, is something many dog owners would support as well).

I also can't refrain from making one last comment: My dogs and I are frequent users of Ft. Funston and the Headlands; in fact, we live in the condos down the street from the headland for more than a year. In all of time utilizing these areas, I have *never* witnessed a conflict between individuals and dogs (or their dog-loving owners).

Correspondence ID: 913 **Project:** 11759 **Document:** 38106

Received:

Mar,03,2011 19:00:12

Correspondence Web Form

Type:

Correspondence: This "Dog Management Plan" draft is saddening. There are already so few spaces for dog owners in the Bay Area to enjoy the outdoors with their beloved animals. Limiting this even further to such an extreme extent would be exponentially more detrimental to the remaining areas. Limiting dog use makes no sense when you consider the amount of humans who litter, harrass wildlife, urinate/defecate, and destroy natural resources much more abundantly than our animal companions. I think an obvious place to start would be to more strictly enforce fines for littering or not picking up after your dog in these already limited areas to help reduce damage. The most destructive dogs and owners certainly do not represent all of us. Considering

the frequency with which I see violations of these simple rules (with major impacts), an intervention leading to stricter enforcement would easily pay for itself and have much more of an impact than the extreme action of barring dogs completely. Another option would be to enforce dog licensing, and even charging an additional fee for screening dogs'/owners' behavior before issuing a "national park license", which could be required for use of these areas. I am a dog trainer and a psychiatrist and have been interested in developing guidelines for licensing service animals (particularly the largely unregulated "psychiatric service animal"). Something like this would also make sense for National Park use, charging a fee for a training session that would notify the dog owners of the rules and help ensure that they are followed, which would also weed out a lot of the destructive dogs and dog owners, who would be ticketed if they did not have their "national park license". Again, if planned correctly, this measure would pay for itself over time. Please contact me using the e-mail above if you'd like to discuss further development of these ideas, I'd be happy to volunteer my time and resources to prevent a complete dog ban in the already limited off-leash parks in the Bay Area.

Correspondence ID: 914 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 19:20:03

Correspondence Type: Web Form

Correspondence: Please reconsider this excessively restrictive proposal, which does not take into consideration the full effects of banning dogs from most of the GGNRA. Crowding SF's dog population in the few small dog parks that exist in the city is outrageous, and would certainly result in more environmental destruction and chaos than the proposal suggests. The GGNRA, at least the parts where dogs are currently allowed, are in no way "wild nature". This is a major metropolitan area, and while efforts to protect what nature remains are admirable, they must also be reasonable.

I absolutely support increased punishments for dog owners with unleashed, unruly animals in public places, and for those who don't clean up after their pets. These people give dog owners everywhere a bad name. But PLEASE do not punish what is, on the whole, an environmentally conscientious group of people and their canine companions for the poor judgment of a few.

Correspondence ID: 915 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 19:20:42

Correspondence Type: Web Form

Correspondence: I am a dog lover, dog owner, resident of San Francisco, and frequent visitor

to GGNRA. The GGNRA plan is fair and balanced. The pet pressures on city parks and diminishing waterfronts is caused in large part because it is fashionable to have dogs in San Francisco and the surrounding urban areas. Keeping dogs in small apartments, lofts, and small homes without space to exercise and roam is selfish and unethical. It contributes to urban crowding, invasions of peace and quiet, and consumes local and state government resources.

A pragmatic public policy approach would encourage urban citizens not to buy or adopt dogs in the first place, or when they do, make sure the living conditions for the dog are compatible with the breed. If they truly love or want a certain type of dog, move somewhere that compliments their own and the pet's needs.

I fully support GGNRA's plan.

Christopher Thomas Scott, San Francisco

Correspondence ID: 916 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 19:56:17
Correspondence Type: Web Form
Correspondence: I believe it is important to change the dog rules to be in line with national standards, to protect the environment, and to protect the other park visitors. So I would advocate the most restrictive of the choices (Alternative B or D). That said, the compromise that the department seems to have chosen appears to be a reasonable alternative.

It is important to prioritize people over dogs in the parks. That doesn't mean eliminating all facilities for people with dogs, just making it so people with dogs don't monopolize the parks. Other people would like to use the parks too.

In my experience at these parks, dog owners have a tendency to be inconsiderate and act with an overweening sense of entitlement. The dog population in the city is growing at a rapid rate. And the situation at parks like Fort Funston has gotten quite out of hand. I won't even go there any longer because it is impossible to have any peace with all the dogs running around. The experience of the place has deteriorated so that unless you are dog owner, and the purpose of the place is to exercise the little beast, there is no use in going there.

I also think that enforcement is needed, not just a change in rules. There are leash laws that go unenforced all over the city with the result of bites, dog waste all over, bike accidents, etc. If the dog culture is going to change,

there has to be enforcement as well as reasonable rules.

I know from my experience of living in New York city that dog culture doesn't have to be so lawless and inconsiderate. It seemed to me that there dog owners tended to obey the rules, use the enclosed dog runs for off-leash play, and clean up the mess their animals made. It seems to me that the strict rules there have something to do with the good behavior.

Correspondence ID: 917 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 19:57:35

Correspondence Type: Web Form

Correspondence: With all due respect, this appears to be sloppy policy.

The completeness of this plan deserves scrutiny. The purposes, rationale provided are subjective and the plan does not present a balanced analysis of current and future state policies and enforcement.

If this plan were to be implemented, it would have to be considered poor practice until all the economic, social, environmental, cultural, biological, oceanic and residential impacts have been quantifiably measured and accurately assessed.

With a large percentage of the NPS land already off limits to canines, it is puzzlingly how noticable benefits will be realized by making 100% of NPS land off limits to canines. What is the return on investment of the cost of enforcement, monitoring and process? I assume tax payers will foot the bill for that cost?

As with all plans, there are "winners" and there are "losers". It would appear that, should this plan be implemented, the loser will be the NPS for pushing through an incomplete plan and most likely an incremental, unnecessary cost burden to tax payers.

Correspondence ID: 918 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 20:08:10

Correspondence Type: Web Form

Correspondence: My wife and I have been residents of the City of San Francisco since January 2010. We own one dog and have consistently visited Fort Funston three times a week throughout. We are members of the National Audubon Society and have read their position and comment on the GGNRA Dog Plan and strongly disagree with them.

Our comment is focused on and rejects the preferred alternative proposed for Fort Funston.

Issue

The letter R in GGNRA stands for Recreation. Currently, Fort Funston is an extremely popular destination for dog owners, and judging by the fullness of the parking lots, maximizes benefit to the public. We have personally contacted and spoken with at least one hundred dog owners and the implementation of the preferred alternative will drive most of them away permanently.

The preferred alternative purports to restore Fort Funston to a natural wild state. Even if this is possible, it will take many years. And even if it happens, how many people will be served in a Recreational manner by the Preferred Alternative? What surveys and data has the Park Service relied on in estimating this number of people? This data must be made publicly available for review.

We strongly contend that the preferred alternative will result in dramatically reduced public use and enjoyment in a recreational capacity of Fort Funston. If the number of people served is reduced, how can the Preferred Alternative serve the public interest? Why would fewer visitors be preferred to more?

If the Preferred Alternative cannot clearly and scientifically be demonstrated to result in serving a greater number of people, it should be replaced entirely. The status quo should be the Preferred Alternative.

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|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 919 | Project: 11759 | Document: 38106 |
| Received: | Mar,03,2011 20:10:31 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am a Bay Area resident with two standard poodles and I strongly support the leash requirement and banning dogs from wildlife areas. I live by the bayshore in Alameda where sometimes loose dogs (which are banned from the beach) harrass resting migratory birds and root out nesting plovers in the dunes. There are so few places in the Bay left for wild birds, which do not have the human-supplied food and health care enjoyed by domestic dogs. Dogs instinctively chase and kill critters, which is not necessary for the dog's survival or health. Marking with urine and flushing out creatures can reduce habitat and inhibit reproduction. Tragically, some dog owners encourage or turn a blind eye to such needless killing and harassment of dwindling wildlife. We are all responsible for maintaining our shared ecosystem and restraining our dog's instinctive destructiveness is a civic | | |

duty.

Correspondence ID: 920 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: My husband and I have been residents of the City of San Francisco since January 2010. We own one dog and have consistently visited Fort Funston three times a week throughout. We are members of the National Audubon Society and have read their position and comment on the GGNRA Dog Plan and strongly disagree with them.

Our comment is focused on and rejects the preferred alternative proposed for Fort Funston.

The Golden Gate Audubon Society claims in their argument for the Preferred Alternative "Too often, we have seen dog-related recreation push out other park users and result in significant harm to the local environment."

Speaking specifically to the Fort Funston area, the Audubon position is completely without merit: ? Fort Funston was significantly altered by the US Government long before any dogs and their owners came to visit. The area has not hosted an indigenous flora nor fauna for many decades. ? Audubon claims about "thousands" of affected species are untrue to the point of being laughable at Fort Funston. Where is the inventory and/or surveys substantiating the impacted species and what reasonable standards were employed to ensure that these surveys were performed by objective parties in an objective manner? This information needs to be made available for public review and comment. ? Other park users have never been pushed out by dogs and dog owners at Fort Funston. There are no recreational facilities there suitable for use by families, children, organized groups or the disabled. And Fort Funston's historic lack of native flora and fauna have made it unappealing long before dogs for purposes of birdwatching. The few thriving bird species at Fort Funston can be easily found in most back yards, are not uniquely native to California and are not endangered. ? Getting rid of dogs will not restore a natural environment at Fort Funston. What dollar and human resources are committed without possibility of revocation to the massive restoration project implied by the size and scope of the Preferred Alternative? If you do not have the resources to accomplish the objective in a reasonable timeframe, the Preferred Alternative is only punitive to dogs and their owners while providing no real benefit to anyone else. ? If the Preferred Alternative is adopted, it is certain that it will push the current Fort Funston users out to other impacted parks and resources in San Francisco that already do serve families, children, groups and the disabled with functional recreational facilities. In short the preferred alternative eliminates

a non-existent conflict and creates a real one.

The Preferred Alternative at Fort Funston is deeply flawed, solves no real problems and is very likely to foster new real conflicts and problems.

Correspondence ID: 921 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 20:15:01
Correspondence Type: Web Form
Correspondence: My wife and I have been residents of the City of San Francisco since January 2010. We own one dog and have consistently visited Fort Funston three times a week throughout. We are members of the National Audubon Society and have read their position and comment on the GGNRA Dog Plan and strongly disagree with them.

Our comment is focused on and rejects the preferred alternative proposed for Fort Funston.

Where there are not vibrant, positive uses of public space, negative uses encroach. On the few occasions where we visited Fort Funston near to closing time, we have observed suspicious activity in the Batteries that a reasonable person would conclude involve drug sales and use.

The nearby Ocean Beach area has a very large homeless population that would find a vacated Fort Funston to be a very attractive, undisturbed camp site. As a former Park Ranger, I can tell you as I'm sure you already know, that long-term homeless visitors to public property definitely foul and degrade the environment, cutting trees for fires, leaving trash and human waste everywhere and scaring away innocent visitors. Dog owners by and large clean up any waste they are responsible for. Replacing dogs with homeless will degrade the environment.

The Preferred Alternative is an open invitation to criminals and homeless persons to come use Fort Funston without being disturbed. The Preferred Alternative does not address the encroachment of bad uses of Fort Funston that will occur as a result of moving the dogs and their owners out. The Preferred Alternative is deeply flawed and should be rejected in favor of the Status Quo.

Correspondence ID: 922 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 20:18:34
Correspondence Type: Web Form
Correspondence: My wife and I have been residents of the City of San Francisco since

January 2010. We own one dog and have consistently visited Fort Funston three times a week throughout. We are members of the National Audubon Society and have read their position and comment on the GGNRA Dog Plan and strongly disagree with them.

Our comment is focused on and rejects the preferred alternative proposed for Fort Funston.

The GGNRA Preferred Alternative at Fort Funston contemplates a massive project to restore the site to a native natural state. Nowhere have we seen credible budgetary figures outlining how much this undertaking will cost nor how long it is expected to take. Especially in this climate of weak economy and declining government budgets we need to see proof that the objected purported by the Preferred Alternative is fiscally feasible.

Conversely, the status quo at Fort Funston requires minimal expenditure. Where will the increased budget come from and what assurance is there that It will be sustained long enough to accomplish the objective?

Without such proof and assurance, the Preferred Alternative is only punishing a substantial public contingent that is well-served by the Status Quo and replacing it with a much smaller served public. This is not fair, is not good deal nor good business. The Preferred Alternative is deeply flawed and should be rejected in favor of the Status Quo.

Correspondence ID: 923 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 20:22:44
Correspondence Type: Web Form
Correspondence: Areas that endangered species such as the snowy plover inhabit should be fenced and strictly protected from the intrusion of dogs.

In less sensitive areas, such as the Great Meadow at Fort Mason, dogs should be able to run free as they do now under responsible supervision by their owners.

I am responding to a physical notice I saw posted at Fort Mason soliciting comments on this document.

Correspondence ID: 924 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 20:48:33
Correspondence Type: Web Form
Correspondence: I am a dog lover but do not own a dog. My experience comes from Cesar

Chavez Park at the Berkeley Marina. A lot of dog owners are not in control of their dogs and disregard the rules. They do not leash their dogs when they are supposed to and even worse, very few dog-owners pick up after their dogs, despite their protestations to the contrary. Dogs are very destructive to other wildlife like hares and birds. The best solution is to have fenced in, dedicated dog areas in a park, where dogs can roam free and not escape. I think that nature needs protection and that dogs should not be allowed everywhere, only in controlled environments.

Correspondence ID: 925 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 22:05:01

Correspondence Type: Web Form

Correspondence: As a surfer at Rodeo Beach for at least 30 years and a previous dog owner and probably future dog owner. I think this is the wrong place for dogs to be allowed free or leashed. I have observed dogs chasing birds. Bothering marine mammals. I have also been in the ocean and observed dogs relieving themselves in the surf line. It is impossible to pick-up after a dog in the surf line. This is a health hazard we should not promote. I think it would be fair to allow them on some fireroads leashed.

Correspondence ID: 926 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 23:10:25

Correspondence Type: Web Form

Correspondence: I use Fort Funston and Rodeo beach regularly. I truly enjoy these beaches, because they are places where my family can go for walks without restriction. I have two beagles and I enjoy watching them run and play with other dogs on the beach. My family goes to one of these beaches once per week for recreation. We specifically choose these beaches because they allow dogs. My family also lives locally and we value being able to enjoy nature together in an area that supports our interests. These beaches cater to those with dogs, because there are very few areas available for off leash dog walking. All other beaches in the state are available for those who would prefer a beach without off-leash dogs. I believe that dogs and their owners deserve to have a few unrestricted areas where they can go for exercise and to be around other people and dogs with similar interests. Over one third of the households in the Bay Area own dogs, yet fewer than 1 percent of the parks allow dogs at all. Further restriction would be unfair to a cohort of people who tend to be more active and more likely to participate in outdoor activity with their dogs than the average household. The Preferred Alternative severely restricts recreational access for people with dogs, The dogs who go to these beaches are very well behaved and are controlled by their owners. People who are afraid of or would rather avoid dogs have

every other beach in California to go to if they chose. The dogs at these beaches do not get in fights and are not dangerous. Most dog owners are in complete control of their dogs. They are able to keep their dogs from areas which would cause a conflict with the environment or other park users. These proposed restrictions punish all dog owners, not just those who fail to walk their dogs responsibly. There are many children and teenage people who cause more destruction to the environment than the dogs or dog owners at these parks. Restrictions need to target specific actions rather than restricting all park use by dogs and their owners.. Signs can be posted stating that children and dogs should avoid running on landslide areas, not cross into fenced off areas, and follow posted rules to prevent destruction of land and protect habitats. Please leave the few dog walking gems alone. Please give the dog owners the ability to participate in a healthy lifestyle with their dogs. Do not restrict the few areas available to dogs and dog owners. Restriction of dogs would decrease use and enjoyment of parks. Residents have the right to use public land. A portion of that land needs to cater to the interests of dog owners. Further restriction would take away the rights of land use to the majority of the people who use these specific parks.

Correspondence ID: 927 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 23:21:17

Correspondence Type: Web Form

Correspondence: I would like to see dogs completely banned. On my last park visit, my 3 year old was accosted by two different dogs (within 10 minutes) which were running loose. My son is highly allergic. I was very concerned and upset that my son may have an asthma attack, as each dog owner was insulted by my non-love for their dogs. Ban them completely, or, at least restrict those "leashes" to 4 feet. If the latter, at least we can get out of their way.

Thank you.

Correspondence ID: 928 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 23:26:01

Correspondence Type: Web Form

Correspondence: My family and I love our dog, value nature, and love walking our dog (on-leash) in the GGNRA and other Bay area open spaces. However, my dog and I have been attacked and bitten by off-leash dogs while the owner was out of sight or unable to exert 'voice control.' Unfortunately some dog walkers irresponsibly let their dogs range freely with destructive consequences for other humans, dogs, and wildlife. The GGNRA needs clear and enforceable limits for dog visitation.

All off-leash dog areas should be fenced or clearly delimited for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.

Also, there should be a limit of 3 (or 2) dogs per person, or even different rules based on size (consider the relative impact of two 15-pound dogs as compared to two fifty-pound dogs). It is not appropriate for the Park Service to create commercial permits for professional dog walkers. The laxer the GGNRA and other agencies are about the numbers of dogs per walker, the more people are encouraged to bring multiple dogs.

Leash requirements must be strictly enforced throughout the life of the policy. Otherwise, proposed on-leash areas will become off-leash areas, as has already happened under the old rules. In my experience 'voice control' is difficult to assess and often ineffective. Moreover, the goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers (recall that the consequences of failure can be very destructive). How about 95% compliance?

In conclusion, I support strong limitations on off-leash activity while retaining ocean/beach access and loop-trail options for leashed dogs and their walkers that are not destructive to habitat and wildlife.

Correspondence ID: 929 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 23:57:27
Correspondence Type: Web Form
Correspondence: Dog owners regularly ignore the restrictions that currently prohibit dogs on certain trails in the Marin Headlands, such as the Tennessee Valley trail and the Bobcat trail. And they can be very rude if politely reminded about the rules, so more restrictions seem like a good idea.

The Headlands is among other things a nature preserve and it is the wildlife that makes it special and dogs, leashed or otherwise, are not compatible with most wildlife. There is actually a larger issue here about owning a pet that requires space to run in an urban area. It is not fair to the dog to keep him inside most of the time except for a brief run in a dog park or wherever.

Correspondence ID: 930 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 00:09:49
Correspondence Type: Web Form

Type:

Correspondence: I believe that dogs should be ideally be restricted to fenced-in areas. A less desirable alternative would be to allow only on-leash access to restricted areas. No dog should be off-leash and running free in GGNRA.

I lived adjacent to GGNRA in Marin for many years, went to school at UCSF, and extensively used the recreation area for running, hiking, and photography. I have never enjoyed being chased by a large, barking dog as I ran, with the owner invariably yelling from a distance, "don't worry, he won't bite." I have also seen too many times an off-leash dog defecating with no owner in sight. These same off-leash dogs invariably are chasing birds, squirrels, and other animals. They disturb native animals and ruin native plants.

The feces left by dogs present an infectious disease hazard. They carry a number of intestinal parasites or worms such as roundworms, hookworms, and coccidia, some of which can infect humans. They also carry Brucella, Campylobacter, Cryptosporidium, Giardia, Lyme Disease, Coxiella, Rabies, Salmonella, and Rocky Mountain Spotted Fever, many of which can be transmitted by exposure to their feces or by dog bite. At San Francisco General Hospital, we have seen over the years innumerable dog bites and many of these parasitic and bacterial infections transmitted by dogs.

I understand that this is a very emotional issue for dog owners, who show up en masse for public hearings. I do, though, believe that there is a large majority of GGNRA users who would like to see dogs in fenced in areas or at least always on a leash, and do not enjoy dodging dog feces left by the irresponsible few. This majority does not attend public meetings or reveal their identities because they are intimidated by some of the more intense and uncompromising dog owners.

Correspondence ID: 931 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 00:22:18

Correspondence Type: Web Form

Correspondence: I am a huge proponent of off-leash areas for dogs. We shouldn't have to drive to Tahoe to find them.

Dogs provide tremendous service to many people and families, and to relegate them to on-leash walks at human pace, with little opportunity for native interaction with nature and with themselves is not adequate and not fair. Fort Funston in particular has been a fantastic place for my dog and my family. She has become socialized and ergo more safe, with people and dogs, and significantly more healthy. The small postage-stamp-sized dog

parks we have simply do not cut it.

Furthermore, these areas were specifically set aside with this use in mind. It is unconscionable to further restrict the tiny amount of free space that we make available for these wonderful additions to our lives. Providing for off-leash access makes our dogs and our families healthier, happier, and safer.

Correspondence ID: 932 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 00:26:18

Correspondence Type: Web Form

Correspondence: I own a dog and I favor control of dogs. My wife and I always walk with our dog on a leash and it can be a problem to encounter unleashed dogs who are not under control by their owners. Their dog may be friendly but my dog does not like dogs she does not know to directly greet her. I know other dog owners that feel the same way I do. If I want my dog to run, I can take her to one of several dog parks that exist for that purpose and are fenced. Please require leashing of dogs.

Dave Johansen

Correspondence ID: 933 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 07:29:18

Correspondence Type: Web Form

Correspondence: I live across the street from a park and do not have a dog. But I am against the new proposal to have dogs leashed at all times. Dogs need to run, fetch balls, play in the water...THEY'RE DOGS!!! With this new proposal, where will dogs be able to have an outlet for their energy? In tiny designated areas? That's like prison...small confined areas. That's so sad to me.

I believe the proposal is more harmful than good. Anyone making decisions should watch at least ONE episode of The Dog Whisperer. Dogs Need Exercise...not just mild walks on leashes, they need to RUN...FREELY. If not given this outlet, I think the harm comes in the dog possibly displaying destructive behaviors, possibly aggressive behaviors. I know that when I don't work out, I feel horrible and I'm NOT good company.

Dogs have rights, too...unfortunately, their voice is not heard. That's why a non-dog owner like myself has to get involved in issues like this so I can make sure those rights are not taken away.

Please focus on more important issues this city is having before taking away the rights of poor helpless animals. If this proposal passes, it will be a

shame. Shame on the people in favor of this. Please don't use your power to take your hatred out on the animals. Make this world a better place.

Of course, I understand where this is coming from, but the few bad dogs (irresponsible owners) should not represent the majority of responsible pet owners. Why should everyone get their privileges taken away?

Correspondence ID: 934 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I used to live and work there, literally there. I do not like dogs for various reasons. I find it entirely intrusive to allow dogs everywhere. Most people are not responsible. There is poop everywhere, they bite and bark, and yes this will happen. When I was bitten in SF years ago, the city authorities said they didn't have time to help when the dog reappeared on the street. Dogs do NOT belong everywhere. I don't care if they are their pet children as people can't seem to deal with life on their own. They do not belong in public space AT ALL! I still go to SF and don't want dogs in my space. I've been bitten, had neighbors whose dogs bark all day, stepped in poop, had dogs jump me everywhere--hikes, paths, streets, homes. They do all these things. There is no reason they belong in the public, esp. in natural settings. Deal with wildlife. Let people keep their dogs in their space which they never do. They would rather kill off wildlife than deny their pets. People, no matter what they say, are not responsible when it comes to their pets.

Correspondence ID: 935 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 09:45:05

Correspondence Type: Web Form

Correspondence: Subject: GGNRA (Golden Gate National Recreation) is proposing a plan which will limit all dogs on or off leash for a very large part of Ocean Beach in San Francisco

As this area is virtually all residential, I feel it is critical to maintain the right to have dogs on a leash at the beach. There is some environmental concern which may or may not be valid; however, there is more than adequate beach south of this area that is ideal for wildlife protection which has limited access due to the terrain. It would be environmentally and financially (the southern area is already conducive to species preservation and would be less expensive to create/manage) more responsible to use this area and allow members of the neighborhood to walk their dogs (many have been taking their dogs to the beach for countless years and would not have chosen to live there if they thought they couldn't). Thank you for your consideration and

hopefully support.

Correspondence ID: 936 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 09:47:27
Correspondence Type: Web Form
Correspondence: March 3, 2011

To Whom it may Concern;

Please choose Alternative A and keep things as they are.

I am a (soon-to-be senior) resident of Sausalito, Ca who goes to Rodeo Beach with my two dogs at least once a week during the winter and more often during the non-rainy season. I thoroughly enjoy time spent with my dogs at Rodeo Beach and, please note: I always clean up after my dogs, and have them under voice command at all times.

Please do not change the current policy at Rodeo Beach or in other areas governed by the GGNRA, for that matter. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the Bay Area.

I believe that there is no factual basis for the argument that birds and other wild animals need to be protected from off-leash dogs. There seems to be no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife. Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impact.

It is my understanding that severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. Target enforcement on the small number of people whose dogs misbehave, not on excluding the entire class of people with dogs from most of the GGNRA. Jean Donaldson, nationally recognized expert on dog behavior testified before the SF Animal Control and Welfare Commission on 2/8/07: "Self-selection operates strongly, i.e., people who take the time to get into their car or walk to a designated off-leash area to exercise their dogs tend not to be the type who

are derelict in other areas of dog guardianship, such as training, socialization, or appropriate containment."

The Preferred Alternative severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA (NOT a national park!!) is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA.

In addition, the Preferred Alternative discourages cooperation between different park users and will increase conflict between park users, as more and more people are crammed into smaller and smaller spaces. Park user groups can work together to resolve problems when they come up.

Please note that a new plan needs to be developed that will be more balanced, supportive of recreation, and reflects San Francisco Bay Area's values of co-existence, shared use, collaboration, and education to solve problems.

Thank you for your attention.

Nancy (Sausalito, CA)

Correspondence ID: 937 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 09:49:54
Correspondence Type: Web Form
Correspondence: I endorse the Dog Management Plan. I believe the rules for lands controlled by the national park service should be consistent. I also believe that unleashed dogs have a detrimental impact on habitat and wildlife.

Correspondence ID: 938 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 10:02:13
Correspondence Type: Web Form
Correspondence: I am a infrequent user of Fort Funston for my dog, however, it is one of the ONLY places left in the area where my dog can go. She isn't overly fond of 100's of dogs nearby, thus dog parks are not an option, and Fort Funston allows us to have a great day in San Francisco with our dog. She loves the wide open spaces, the beach and the general good natured attitude of the other people and dogs at the Fort.

When we travel to San Francisco for a day, often the only reason is to get

out for a hike with our dog.

Please do not close Fort Funston to our family members.

Correspondence ID: 939 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 10:30:31
Correspondence Type: Web Form
Correspondence: Hello, Thanks for taking the time to view my comment. I would like to introduce myself, Darcie DeLashmutt, a San Francisco resident, Landscape Architect, and dog owner. While there are many great aspects to the GGNRA Dog Management Plan, I am writing to express my concern over the portions which impact dog areas and leash requirements.

I am concerned for many reasons, some of which include: - Off leash dog areas are already highly utilized and will likely exceed capacity under the management plan. - Many dog owners will be required to drive great distances to properly exercise pets. - Given our urban setting, the advantages in the Management Plan simply do not outweigh the constraints; it is not an appropriate plan to apply in an urban setting. - As a dog owner I understand that there are legitimate issues to integrate owner's needs with the needs of other uses, and feel that there are more effective ways to achieve this balance than through the plan.

I appreciate your consideration and welcome any questions. I hope we can all work together to keep the plan appropriate for an urban environment and allow everyone to use these public spaces in a positive way. Sincerely,
Darcie DeLashmutt

Correspondence ID: 940 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 10:32:17
Correspondence Type: Web Form
Correspondence: PLEASE DO NOT FURTHER RESTRICT DOGS AND THEIR OWNERS!

-- THE BAY AREA HAS MARVELOUS NATURAL BEAUTY. PEOPLE OFTEN ARE EXPOSED TO NATURE ONLY THROUGH WALKING THEIR DOGS. --THESE PEOPLE ARE VOTERS WHO CARE ABOUT THE ENVIRONMENT IN LARGE PART BECAUSE THEY ARE FREE TO ENTER IT WITH THEIR DOGS.

--PEOPLE HAVE JOBS AND LITTLE TIME AND CAN'T GO TO "DOG PENS" WITH DOGS AS WELL AS HIKE IN NATURE. DOGS BENEFIT

AS WELL FROM ROMPING AND PLAYING IN A FREE NATURAL ENVIRONMENT.

--THE IMPACT OF DOGS ON THE ENVIRONMENT IS FAR LESS THAN THE IMPACT OF CARS AND MOUNTAIN BIKES AND TRASH LEFT BEHIND.

--THE IMPACT OF DOGS ON THE ENVIRONMENT IS POSITIVE BECAUSE IT BRINGS PEOPLE OUT TO NATURE SO THEY CARE ABOUT IT!

--POPULATION HEALTH: COMPANION PETS HAVE BEEN DEMONSTRATED AS BEING POTENTIALLY VERY BENEFICIAL TO PEOPLE'S HEALTH AND WELL BEING.

INSTEAD OF LEASHING AND RESTRICTING WHY NOT COMPROMISE AND INCREASE THE PENALTY FOR LEAVING DOG DROPPINGS BEHIND?

--PEOPLE WON'T VOTE TO PROTECT THE ENVIRONMENT IF THEY DON'T CARE ABOUT IT! LET THEM BRING THEIR DOGS OFF LEASH!

Correspondence ID: 941 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 10:44:52

Correspondence Type: Web Form

Correspondence: Due to international travel I was unable to attend any of the open house forums set up for comments, so I offer this response instead. I am a local dog owner that currently greatly enjoys weekly and sometimes daily access to the canine-allowed areas of the public lands of the GGNRA.

There are some elements of the proposed plans with which I agree. Some limits on off-leash dogs where environmentally necessary is fine. And providing more areas with no dogs is fine for park users that do not want contact with dogs.

However, in general the preferred alternatives at many sites are needlessly restrictive, especially in terms of restricting any dogs (even on leash). Many trails that are currently open to dogs on leash -- and where the majority of park users are dog owners -- would be permanently off limits to all dogs. Most disturbing is that there is no scientific environmental argument for these punitive restrictions (by the way I am a PhD level educated scientist from an Ivy League Graduate school). Although marketed as an "environmental" impact report, in most cases there are no good

environmental arguments for restricting dog access. The report is simply being used to advance an unbalanced agenda of wholesale restrictions on the access rights of dog owners.

For example, consider the Bluff Trail at Mori Point. This trail is heavily disturbed by generations of human impact. It is littered with concrete debris from various military installations, many covered with graffiti. Invasive species of ground cover are rife. The trail is short and leads directly away from park property. The trail is extensively used by current dog walkers as a way to complete an easy loop back into Pacifica property. No alternative exists for this loop. There are simply no environmental grounds for excluding dogs from this trail. However it appears that since the "Preferred Alternative" is simply to exclude all dogs wherever possible then with a stroke of a pen all dogs will be excluded. Why? That is entirely against the mandate of the Park Service. Have the authors of the report even visited the site? I would happily show them the widespread, long term, and ongoing human (not canine!) disturbance to the site if they actually want some hard facts to add into the report. But instead the authors just seem to follow the unbalanced agenda of canine restrictions at any costs.

Likewise why is the Upper Mori Trail now forbidden? And the heavily impacted Sweeney Ridge, entirely off limits to leashed dogs with no good reason.

Another example -- the Miwok trail in the Marin Headlands. Wide, accessible, only one step removed from being a fully paved trail. Plenty of room and width for all users. If you want to require dogs on leash, fine. But why forbid all dog access on this impressive and underused trail? I have walked the length of that trail and seen hardly one other trail user. What is forbidding on-leash dogs achieving here? It simply makes no sense. To whitewash this as "environmental" is utterly disingenuous. Why not just ban ALL PEOPLE entirely from the Headlands. By the proposed arguments that would have a HUGE beneficial environmental impact! So seriously, why not do that? Just have everyone stay at home on their couches and never come near these public lands. I'm sure the writers of this report would be delighted if only they could make that happen and just throw razor-wire around all public open space.

Milagra Ridge: why is the Loop trail off limits to leashed dogs? The trail has barriers on both sides. What is the argument for not allowing on leash dogs?

Baker Beach: Sand and no threatened species. What is the environmental benefit of the "Preferred" Alternative? Certainly there is not one that can be justified. The report calls for restrictions just to be restrictive with no justification. Same could be said for Muir Beach.

New Lands: Apparently a blanket ban with no consideration at all of past use and the access rights of long time users. For example the property in Montara (and most of the new lands in San Mateo County) is used at times almost exclusively by dog owners. And yet GGNRA considers it necessary to prohibit them all with the stroke of a pen. Again restrictions for no articulated environmental reason. Simply restrictions for the sake of being restrictive. Why? The preferred alternative as currently written in this report is clearly a violation of the GGNRA mandate for continued public access.

To conclude. Some level of dog restrictions in areas of environmental sensitivity, and to separate dog owners from other users, is fine. But the aims of this proposal are clear: restrict almost all access to a very large portion of current park users simply because they want to walk their dogs. This is direct restriction on access rights of dog owners masquerading as an environmental impact report. And it is in violation of the Park Service mandate.

Furthermore, as I have detailed above the report is not balanced or scientific: it simply aims to restrict dogs as much as possible while attempting to have a scientific basis. It should be rethought and a new Alternative entirely proposed that properly balances environmental considerations with the recreational needs of the one third of Bay Area residents and visitors that are dog owners. That is the purpose of the Park Service ? not wholesale restrictions on access.

Correspondence ID: 942 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 10:51:41
Correspondence Type: Web Form
Correspondence: The Draft Dog Management Plan seems like the start to the end of off-leash dog walking. The city first gave the NPS Fort Funston with the clause of allowing off-leash dog walking. And this is what people use it for because there are not many areas in the city that will allow for this type of recreation. People will walk their dogs in ALL types of weather so the few areas are in constant use. Because of this there is an "environmental concern" about these areas. The NPS thinks the best way to handle this is to restrict the activity of off-leash dog walking. By doing this the area for off-leash dog walking is smaller, yet the number people/dogs remain the same. What do you think the impact on these areas will be in a year? 5 years? And what do you think the solution will be to the impact? Smaller areas for off leash dog walking? The problem the NPS has with the recreation activity of off-leash dog walking is that people use the parks often and consistently. This has an impact on the parks being used. The NPS wants to keep the parks unused so there is no impact on these areas. And what good is a park that no one can use?

Correspondence ID: 943 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 11:35:06

Correspondence Type: Web Form

Correspondence: I don't agree with closing Muir Beach to dogs altogether. Muir Beach is not only part of the NPS, but is also part of a community, and the Park should take into consideration the community needs as well as the public at large. For many residence of Muir Beach, the beach is the only safe public area to walk dogs. I actually wouldn't object to allowing dogs on-leash if it is a viable alternative to banning dogs altogether. Allowing dogs on leash would mitigate many of the safety and habitat concerns that seem to be the main objections to allowing dogs in areas that are both wildlife habitat and public recreation. I hope the NPS will realize that to many dog owners their dogs are as much a part of the family as children and it would be a great loss to many families not to be able to enjoy family outings with the "whole" family.

Correspondence ID: 944 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 11:38:24

Correspondence Type: Web Form

Correspondence: I agree with the principles set forth by the Golden Gate Audubon Society:

1. All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.
2. There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time.
3. Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules.
4. The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.
5. While dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals that rely on the park to survive. It is fair to ask dog owners to accept certain limits for areas where their dogs may play when the survival and wellbeing of so many wildlife animals and plants is at stake.

Regards,

Robert Hall

Correspondence ID: 945 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 11:45:38
Correspondence Type: Web Form
Correspondence: There should be a pragmatic approach to this issue which includes proof of harm or potential harm to specific species from dogs whether on a leash or not. My personal believe is that a few areas for dogs to run off leash is reasonable and should be permitted. I would be in favor of dogs being licensed for this activity as a compromise.

Correspondence ID: 946 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 12:20:14
Correspondence Type: Web Form
Correspondence: Please opt to take no action on this measure. There is precious little grass and fresh air for apartment-bound pets, and to prohibit dogs from playing in their natural habitat is cruel and unnecessary. I don't own a dog, but I don't mind sharing space with them as long as they are accompanied by a responsible person. Thank you for your time.

Correspondence ID: 947 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 12:25:27
Correspondence Type: Web Form
Correspondence: I have lived in San Francisco for over 30 years, twenty of them with dogs. We have always enjoyed living here because of the generous access to the outdoors, beaches, parks etc. in our opinion, the new dog restrictions are too severe. We have experienced, for the most part, extremely responsible dog owners in our outings. I believe that the current policy works well and doesn't need changing, people coexist with dogs, children quite well from what we've seen throughout the years. Please leave well enough alone. Thank you.

Correspondence ID: 948 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 12:57:31
Correspondence Type: Web Form
Correspondence: In a city where dogs are revered and outnumber child per capita, I feel as

though this widely sprawling new leash proposal is unnecessary. While I can understand the need for dogs to be on leash in preservation areas, I don't see a need to insist dogs be on leash in all parks and beaches. Allowing dogs to be off leash and to run freely, and respectfully, is something that is truly unique to San Francisco - we are a dog loving community!

I am regularly at Crissy Field and many other surrounding parks and beaches with my dog and see many other dogs and people interacting peacefully and with respect. It is one of the great joys of our fine city. As a dog owner and lover, with many dog owner friends, and as someone who takes advantage of our great parks and beaches with my dog (and cleans up after both of us), I strongly am against this new proposal.

Sincerely, Laticia Headings

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|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 949 | Project: 11759 | Document: 38106 |
| Received: | Mar,04,2011 13:33:23 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I would like to comment on the folks who think dogs belong only on leashes and do not deserve to be off leash because of dog messes left by irresponsible owners. I often take my dog to Fort Funston and find that dogs get along well with other dogs off leash - in fact - if you walk your dog on a leash anywhere - you will find they are more aggressive as they are more protective on a leash. I live along the Great Hwy and feel dogs should be on a leash along the path - but truly feel there is no need for leashes on the dunes or on the beach. Two months out of the year is ridiculous as the notion that the Snowy Plover is being threatened by dogs is, I believe, unproven (have you seen the dunes after a storm - the sand is all over the Great Hwy - maybe we should restrict Mother Nature from the beaches for destroying the 'natural habitat' of certain animals). Humans are replanting the vegetation along the GGNRA - who is to say this is what it is supposed to be - if we left things undone - we would have sand covering most of the Ocean Beach homes. If you are going to make restrictions for dogs - then I think you need to restrict humans too. Irresponsible dog owners do not pick up after their dogs. Irresponsible humans don't pick up after themselves. On weekends (especially wonderful weathered weekends) I see trash left behind along the curbs by irresponsible humans who can't seem to find a trash can (trash cans are plentiful along the Great Hwy). Do we restrict humans from using the beaches and recreational areas because they leave trash behind? What difference is it for the irresponsible dog owners who don't pick up after their dogs? I believe humans and dogs can coexist in the GGNRA - Please keep offleash areas for those of us who enjoy running with our dogs. Don't punish responsible humans for irresponsible human behavior!! | | |

Correspondence ID: 950 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 14:20:14

Correspondence Type: Web Form

Correspondence: Hello,

My husband and I have been bringing our Sheltie (Simba) to Fort Funston for the past 3+ years. We go almost every weekend and it's one of the highlights of our weekend. Simba loves being at Fort Funston. He loves to wander around, explore and play with us and other dogs.

I understand that people who are not dog owners may not find the park as great but they have the option of going to another park or even Lake Merced which is right across the road. We, as dog owners and our pets do not have many options.

I hope Fort Funston stays as it is, a place for dogs and dog lovers to walk and enjoy the park.

Thank you for your time.

Correspondence ID: 951 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 14:46:45

Correspondence Type: Web Form

Correspondence: PLEASE do not reduce the dog off leash area! there are not alot of places to be able to take your dog legally off leash in the city and this is safe friends environment for off leash.

Correspondence ID: 952 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 14:53:56

Correspondence Type: Web Form

Correspondence: To Whom It May Coicern,

I would like to express my complete dissatisfaction with the proposed dog management plan for the GGNRA. It is extreme and does not make any sense.

First of all, we all know that many of the areas you are planning to restrict were given to the federal government with the express stipulation that the historic uses would be left intact. We have been able to have off leash dogs at Fort Funston, Ocean Beach, and Crissy Field for scores of years. The

GGNRA, and in particular, the areas in San Francisco, are URBAN parks. I would agree to some restrictions, but the restrictions you pose are draconian. It will destroy the quality of life for thousands of residents and visitors who have enjoyed the recreation these areas have provided with their dogs their entire lives.

I also want to point out that you cannot think that people will believe you are doing this to preserve environmental quality. In the past few years, you have turned Crissy Field into an event center. It is not run like a national park. It is run for profit, and that is completely evident by the tens of thousands of people you bring in for events like the 'Cold Splash' event last weekend. I saw those people trample plants and leave litter all over the place. No one did anything about it. And you have events like this on a regular basis. How can you possibly justify eliminating dogs because it is a 'national park' but keep having fun runs, swims, regattas...all of which bring in people who have no respect for the park or any kind of environmental aspect to anything. It's incredibly hypocritical, and just shows that you have an agenda against dogs....not an agenda to save the environment or provide a pleasant national park experience. If you would ban these events, which I would think are probably frowned upon in a national park, then maybe I would believe that you care about the environment. I don't see Yosemite telling thousands of runners to come over for a 'fun run' up to half dome. Isn't that how you are trying to sell this? That you need to manage these parks like the rest of the parks?

Crissy Field and Ocean Beach are basically amusement parks now, due to your mismanagment. Everyone...families, swimmers, boaters, residents, visitors, and dogs, have historically gotten along just fine in these areas. Now you want to eliminate dogs. The dogs are not the problem.

Sincerely,

Dianne Younger Rosse

Correspondence ID: 953 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 15:01:43

Correspondence Type: Web Form

Correspondence: There should be no question that if there is a threatened species that may be extinct if dogs continue to roam free, that dogs should be on leash or banned from those areas. Furthermore, where dogs are allowed in the GGNRA, dogs should be on leash. They not only destroy endangered and threatened species but also destroy the non-threatened vegetation and life that the rest of us would like to enjoy. Additionally, dog owners are not close enough to them and often don't notice when their dog poops, so this increased the

amount of dog waste in the park for other park users to step on. It also makes the park smelly and less enjoyable. I notice the destruction of our beautiful park lands on a daily basis. I also notice dog walkers not pay attention to their dog(s) and thus leave dog poop for the rest of us to deal with. I've noticed when dogs are on leash, the owner generally notices when the dogs stops to do its thing and I've noticed that they thus pick up the dog poop more often than owners with dogs off leash. Further, the current off leash areas are getting totally destroyed with dogs running off trail and digging up plants. Dog owners think it's cute and not destructive. I have pointed it out to dog owners who do not respond politely and do not stop their dog from destroying the park. Other dog owners even come to the defence of the owner. And the few owners that do say they are sorry and know that they are breaking the rules, will call their dogs and the dogs don't respond. Then the person has to go off trail and chase after the unleashed dog. There really should be no off leash areas for these reasons. However, dog people won't be happy with this. So if you must appease his unruly group, please have off leash areas completely fenced off. Let's keep the damage in one place.

Correspondence ID: 954 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 15:29:20
Correspondence Type: Web Form
Correspondence: CRISSY FIELD COMPROMISE

Stephen S. Noetzel 5 March, 2011

As an advocate for retention of off-leash dog-romp areas, I'll start with a bold admission. After considerable personal experience, I'm willing to concede that there are areas of the CRISSY FIELD public recreation complex, that should be restricted to 'NO PETS ALLOWED'.

Further, I believe there are additional areas that should be restricted as; 'PETS ON-LEASH ONLY'.

But that is not to say there is no area left for OFF-LEASH BEACH DOG-PLAY. There is, and that is the essence of the CRISSY FIELD COMPROMISE, as follows.

EVOLUTION OF THE "CRISSY FIELD EXPERIENCE"

At the outset, one must recognize that along with the entire Presidio, the 'Crissy Field experience' has changed dramatically over the past decade. The transition from 'quiet military enclave' to 'full public use' has been nothing short of stunning. I have no empirical 'park usage' statistics to cite (does

anyone?), but by my own anecdotal observation, I'd venture to say that the number of park users on a chilly, overcast weekday afternoon, exceeds by far the number of 'weekend sunny-day' visitors one might have counted in the spring of 2000.

Ribbon-cutting ceremonies for new facilities and improvements were hardly required. Marina residents watched the windblown tundra of the ancient bay-front airfield blossom to a unique urban park that never missed a note in protecting original flora and fauna, while at the same time inviting unprecedented growth in recreational usage.

By word-of-mouth alone the news spread like wildfire. There was a new beachfront park in town, and it had everything. It was no longer necessary to cross the bridge to find a family-friendly beach on a warm weekend. It was sitting right under the bridge, with easy access, plenty of parking, clean user-friendly restrooms and picnic areas, and a safe walking/jogging trail with a world-class view on one side; a stunning bird-sanctuary lagoon on the other. The Crissy Experience was 'in', and everyone wanted a piece of it.

At first, a few kite-flyers moved onto the Crissy beach from the Marina kiting Mecca. Out on the blue bay, the wind surfers soon came in droves. At some point, an inventive observer must have gazed admiringly at the juxtaposition of kites in the air and wind surf sails on the bay, and without skipping a beat, a flock of kite-surfers was soon added. With all that dramatic and colorful athletic activity, the observing crowd on the beach doubled, then doubled again in short order.

And here, in my opinion, TWO critical points arise. First: Every new user took 'ownership' of their particular 'Crissy Field Experience'. Second: Not every 'experience' is universally compatible at all times

MY PERSONAL DOG-PLAY EXPERIENCE AT CRISSY FIELD.

I first came to this awareness shortly after taking ownership of my own off-leash Beach Dog Romp experience at Crissy. It was the spring of 2007 and Glicka was only a year old. Enjoyable as they were, looking back now I can point to those warm-Sunday-afternoon puppy-romps' on a crowded Crissy Beach, as my first recognition that there was an element of incompatibility here.

And of course, we were not alone. The problem becomes acute when it's warm and sunny. That's when the parking lots fill up and the beach becomes crowded with users. To begin with there are families, with kids. The shallow Tide Pools are a perfect resource for giving young children and toddlers their first 'water experience' in a beautiful natural environment. Of course, the same holds true for young dogs. One would hope that the two

experiences might be compatible, however, in fair observation one must conclude that they are often not. Young children trying to gain confidence in a natural water environment, are not compatible with a quartette of young puppies exuberantly splashing in circles around them.

On such picture-perfect days on the Crissy beach, one can also count on a myriad of other enthusiasts. In addition to the families setting up their blankets on the beach, there are wind-surfers, paddle surfers, kite-surfers, and aqua-sports athletes in every possible combination thereof. Some of them in need of great stretches of beach to lay out their lines and gear, before taking to the bay. Add to this colorful array the picnickers, settling onto the beach to take in all the action and the ever spectacular view.

All of these activities seem to fit, sometimes just barely, into compatibility. Much as I'd like to add my unleashed dog to the scene, I must regretfully conclude that it becomes a bit "too much". On a busy sunny day at Crissy Field beach, I must conclude, the addition of off-leash dogs is simply not a reasonable addition to the venue.

I therefore offer: THE CRISSY FIELD COMPROMISE.

To start with, I would support a NO PETS policy for the beach area EAST of the tide-pools. That is, the beach itself, from the Tide Pools area, stretching eastward all the way back to the Pedestrian Beach entry, at the San Francisco Marina.

I would support the establishment of On-Leash Only regulations for the mile-long walking path stretching westward, from the Marina area, all the way to Ft. Point.

And, most vigorously, I would support the establishment of a designated Off Leash Dog Play Area, on the long strand of beach, starting approximately 60 yards immediately west of the Tide Pool Outlet, and continuing westward, for roughly a half-mile to a point approximately 60 yards east of the US Coast Guard Station jetty.

HOW TO MAKE IT HAPPEN

Adequate and communicative SIGNAGE is the key.

I would recommend a modest barrier, of some sort, at both ends of the Off-Leash beach strand, to demarcate the boundaries. Not a fence, but some sort of obvious intermittent barrier material (a series of attractive boulders come to mind).

Most important, along the line of demarcation, and in numerous other

places, appropriate, definitive SIGNAGE is the key to control and compliance. Between the 'boulders' demarcation line (for example) there could be 'two-sided' signs.

One that says: ENTERING OFF-LEASH DOG PLAY AREA

While the opposite side of the sign says: DOGS ON LEASH ONLY

A series of 'NO PETS ALLOWED on THIS BEACH AREA' signs could be strategically placed to define the beach areas from the tide-pools, running east, to the Marina.

By use of adequate and instructive SIGNAGE, the entire practice of park-users bringing dogs to Crissy Field could be SHIFTED somewhat westward. A parking lot, marked 'PARKING FOR ACCESS TO BEACH DOG PLAY AREAS' could be established on the south side of the beach-front road (i.e. Mason Street), just WEST of the point where HALLECK STREET terminates (at Mason) as it emerges from the Presidio.

The existing Stop Signs at the intersection of Halleck and Mason already provide for safe passage for pedestrians and canines entering the already existing pedestrian bridge (right at that point) that leads across the lagoon and onto the aforementioned Beach Strand.

The lagoon-spanning footbridge could be marked with prominent signage stating: 'THIS WAY TO OFF-LEASH BEACH AREA'

All of the above would serve to alleviate congestion; spread out parking for designated park use; reduce canine intrusion in areas of 'family beach use'; preserve and enhance existing bird-sanctuary areas, and generally?..give all segments of the public fair access to the unique natural resource gem called CRISSY FIELD.

WHY STRUGGLE TO RETAIN AN OFF LEASH BEACH AREA AT CRISSEY?

One quickly realizes that this long strand of almost secluded beach?.is far more of a 'strolling beach' than a 'blanket beach'. Indeed, even on perfect summer days, sitting sunbathers are few and far between. In short, it's a perfect place to let Glicka's ball fly?in long and graceful arcs, and to watch her race along the water's edge, and 'crash the surf' to retrieve it. She is a strong runner and an even stronger swimmer. A supremely trained 'urban athlete' in the prime of her life. She needs lots of un-encumbered space to stay in shape. A long walk in the beach sand (as we slowly make our way toward the end of the beach near the Coast Guard Station) is good for my

health as well.

Obviously one can find other places to romp. In fact I have traveled extensively with my dog ? all over the western states in the past half-decade. We've found many lovely off-leash beaches, forests and fields to romp and ramble in. I can tell you that Crissy Field is unique. I can vouchsafe that there is no strand of beach in America as perfect as this for a man to commune with his dog; to share with other friendly, active people and their dogs; to gaze at a stunning world-class view; and to recognize that all this exists within the boundaries of the great city that is my own home.

In my seven decades on this earth I have traveled far and wide - experienced many wonderful things. As I live and breathe, there is absolutely no other activity I can think of, that tops an exuberant summer evening 'cool-off romp' - with my dog (companion), at Crissy Field, in San Francisco. And I am not alone. Every time I walk that long strand of beach, I meet others along the way. Occasionally their dogs befriend my own, for a fleeting chase or swim. The comments exchanged with strangers along that strand are largely the same. "Spectacular"; "Unique?.one of a kind"; "Perfection!"

Should the bark of a dog interrupt, I'm convinced they are only adding their full concurrence. This place; this time; this strand of beach at Crissy Field, is enjoying its best possible use. It would be criminal to take it away.

Stephen S. Noetzel San Francisco, CA 94110

Correspondence ID: 955 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: We as human beings ask much of our canine companions, we ask them to provide assistance to blind persons, to provide therapy for the sick and aged, to detect health compromises such as cancers and other life threatening illnesses, to detect drugs at our borders, to detect bombs in airports, schools, ports and other sensitive areas. We have domesticated these wonderful animals for our benefit not theirs and as such we must provide for their health.

Off leash areas are not simply a place to let your companion run wild, they are a fundamental necessity for their health. If we are to compare the needs of wildlife and domesticated animal life, I argue that deer populations and snowy plover populations to name two wild species are not more important than our canine companions. If anything our obligation to an animal species we've domesticated exceeds our obligation to the animals we have not. Dogs have become our lives and we live our lives with them and in many cases as

stated, because of them.

On the need for regulation, I agree. Noting incenses me more than encountering un-retrieved feces from a public place or an aggressive dog whose owner is the blame for that aggression. In that regard let us call for permits, fines and whatever other means necessary to curtail irresponsible behavior by a dog owner. But let's not ban dog areas en-masse for these reasons. That simply shifts the burden to another area and punishes all responsible persons. In a comparison, people litter on the beach and in parks and yet other people form committees to clean it up, but we don't ban people from beaches and parks for littering, but in this proposal dogs are being singled out unfairly for such reasons.

The need to protect the environment is an easy thing to yell out, well let's also yell out for the need to have an environment for our companions. One species is not above another, all should be cherished, especially the ones we teach to save and enrich lives.

Simply stated... In a community where the number of dogs exceeds the number of children, it is patently obvious of the need to provide healthful services for the community. In a recreation area such as the GGNRA, the fact that less than one percent of land is designated R.O.L.A. to the welfare of dogs is wrong and reprehensible and thus this proposal is fatally flawed. I would like to see a proposal that accounts for the facts I have spoken here today and increases R.O.L.A's not decreases them.

Correspondence ID: 956 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: We as human beings ask much of our canine companions, we ask them to provide assistance to blind persons, to provide therapy for the sick and aged, to detect health compromises such as cancers and other life threatening illnesses, to detect drugs at our borders, to detect bombs in airports, schools, ports and other sensitive areas. We have domesticated these wonderful animals for our benefit not theirs and as such we must provide for their health. Off leash areas are not simply a place to let your companion run wild, they are a fundamental necessity for their health. If we are to compare the needs of wildlife and domesticated animal life, I argue that deer populations and snowy plover populations to name two wild species are not more important than our canine companions. If anything our obligation to an animal species we've domesticated exceeds our obligation to the animals we have not. Dogs have become our lives and we live our lives with them and in many cases as stated, because of them.

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Correspondence ID: 957 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 16:13:45

Correspondence Type: Web Form

Correspondence: I think that trying to provide on-leash and non-dog experiences in the same areas confuses dog owners. Many dog owners do not adhere to the non-dog portions of a beach or trail if there is a connecting on-leash area. And they often do not adhere to the on-leash restriction in the allowed area. If you are depending on on-leash restrictions to protect wildlife you are wildly optimistic.

I think you should completely ban dogs in some areas - anywhere there is sensitive wildlife habitat, and allow on-leash and off-leash in distinctly separate, high use areas.

Some specific comments: I understand the dog restriction on East Beach - there are so many dogs there you never know what you're going to find in the sand! But having a on-leash area right next to the Plover habitat is risky. I would stop the on-leash area further east.

I think your suggestion for Ocean Beach is good and will work, because of the size of the beach.

Dogs are all over the Marin Headlands, often off leash on trails that are non-dog. It is too confusing, not posted, and there is no monitoring. Let there be dogs on Rodeo Beach and one trail loop, and that's all.

Thank you for your efforts to protect the wildlife in our beautiful GGNRA.

Correspondence ID: 958 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 16:21:16

Correspondence Type: Web Form

Correspondence: Please keep the recreation areas open to dogs to run around in. Dogs need exercise as much as humans, if not more, and must run to get the full extent of the benefit of exercise. By banning dogs or keeping them on leash, not only are you mistreating them but you are effectively committing a preemptive strike, declaring them guilty before any problem arises. We are morally obligated to care for those creatures who cannot care for themselves.

As Arthur Schopenhauer declares, "The assumption that animals are without rights and the illusion that our treatment of them has no moral significance is a positively outrageous example of Western crudity and barbarity. Universal compassion is the only guarantee of morality."

Correspondence ID: 959 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 17:38:05

Correspondence Type: Web Form

Correspondence: I'm very happy the dog problem is being addressed.

I'm a runner, and an environmentalist . . . and am long tired, tired, tired of seeing people with dogs off leash in on-leash areas, and unwilling to respect the wildlife preserves by bringing their dogs there. Mind you- I don't hate dogs. I know they can be walked and run with on-leash-happily for both dog and owner. I've done it. But keep them on leash in public. This is the law and it's about public safety. I've been attacked by a dog while riding a bike, and another dog charged 2 of us while on horseback-causing the person I was with to fall and be injured. The owners of the dogs in both cases cared more about their dogs' "freedom" than about our safety. (I can provide more details on both incidents- if you like.) Amazingly, someone I know, a yoga instructor, was running with his large (scary looking) dog around Phoenix Lake. The dog was nowhere near him. I called out and asked him to leash

his dog- and he refused. This last, especially, was yet another example of Marin County residents' overly-developed-sense -of-entitlement; is it generational? Cultural? I'm from Georgia and this kind of attitude did not fly where I came from. Basically, if you don't want a dog encounter, don't go on the trails in the water district land, or on any of the trails in open space whether state or government land- the dogs are off leash- at least half of them. This is not fair to people seeking to enjoy the area, nor is it legal. It seems to me if you want to let your dog run free, you need to purchase acres of land, and fence it and let them go there. Otherwise- people need to grow up, behave, take responsibility and follow the rules.

One final note: I hear the the water quality on at least one trail/fire road are in Novato has been seriously degraded due to dogs, off leash, running free and defecating in the creeks. I am sorry that I did not write down the exact location, and if it is again brought to my attention, will send it along.

Correspondence ID: 960 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 18:22:46
Correspondence Type: Web Form
Correspondence: I support the recommendations proposed by GGNRA in the dog management plan. I support limiting dog off-leash areas and increasing restrictions on dogs. My reasons are to protect wildlife and to provide an enjoyable experience for park visitors. It is my experience that many dog owners think their dogs are under voice control, but reality is otherwise.

Correspondence ID: 961 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: RE: Fort Funston

I was born and raised in San Francisco and used Fort Funston frequently as a child. I had at least two birthday parties there that I remember vividly. We played capture the flag! In high school, I often took walks there, both with friends and with my parents. It is one of the beautiful places on earth.

Since having children myself, I have discovered, to my dismay, that Fort Funston is no longer a safe place for them. Where there were once a few dogs off leash, there are now dozens upon dozens, possibly even a hundred on some days! We tried to walk there once when our children were toddlers and were approached by bounding dogs at every turn. The owners would sometimes call out "don't worry; he's friendly" but we were still sufficiently intimidated not to return. My parents, who are not steady on their feet, have

given up walking there for the same reason.

There is also the issue of poop, which is everywhere. It is often left on the ground or on the steps to the beach in bags, presumably to be retrieved later, but the effect is the same: it is both unsightly and unsanitary, and a particular risk for small children.

I would like to raise an important point, which is that many of Fort Funston's visitors who are not dog walkers have by now completely given up using the park. I almost never go there myself and my parents don't either, though it was, at one time, our favorite park in San Francisco. I presume that a majority of current park users are dog-walkers but this is not because the rest of us would not LIKE to use Fort Funston. It is because, under current conditions, we can't (or find the experience so unpleasant that we choose not to). This is important to note because people who have stopped using Fort Funston or any park are very difficult to locate, much less organize. Dog-walkers, on the other hand, congregate daily and can present themselves as majority users, when in fact they enjoy that status only because other users have been forced out.

I strongly support adopting the new dog plan, which will allow Fort Funston to be shared, once again, by families, by children, by the elderly... by people of every kind.

My thanks to the National Park Service for undertaking this monumental (and no doubt contentious) task.

Nathaniel Stookey

Correspondence ID: 962 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 19:06:47
Correspondence Type: Web Form
Correspondence: I would have liked to side with Alternative E, but because of some of the limitations provided I'm forced to go with A. No action. It's upsetting to see that throughout E there was almost no effort to try and keep areas as voice-controlled. Throughout the entire plan, there is 0 effort, zilch, nappa, zip, to try and CREATE areas for off-leash dog walking that would supplement the closure of any of the areas the initiative aims to protect.

I wish that I could have done something here to try and protect natural resource and wildlife areas. But there was no option that attempted to do that while keeping dog owners as happy as possible. About problems the general public has with dogs in these areas, I could care less, because I'm sure they account for a minority of the people that use these areas heavily.

You can't just go around entertaining the minority. Let them hate dogs somewhere else. We dog owners are an extremely large part of the user base of the areas.

In the vast majority, visitor experience is enhanced by dog laws as they stand. Go to the areas and watch people smile as they watch dogs and humans enjoying the freedom of the beautiful areas. If there is conflict, I'm sure it's in the very very bottom parts of the minority.

If you want to maximize dog walker compliance, keep things as they stand. What could be more clear and enforceable than saying this whole park at Chrissy Field is off-leash. If you are scared of dogs go somewhere else, because you are the one with the problem we shouldn't have to conform to you.

If you want to ensure a safe and healthy work environment for park staff provide simple training, it's not hard when the dogs have an owner nearby anyway.

Commercial dog-walking creates jobs and an entire industry that not only provides happiness for dog's and for dog-walkers, but half the city that works and needs their dog to get healthy exercise.

Natural Resource areas are already off-limits to people and dog's. if someone breaks that law, and enters or tampers with the zone, they should be punished by the laws as they stand now. If anything, increase the off limits boundaries with extra signage and public awareness of punishments. I don't enter the no-dog zone's if I clearly see a reason not to. And I would frown upon anyone taking themselves or their dogs into one of the areas that are obviously for protecting resources and wildlife.

Correspondence ID: 963 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 19:23:38
Correspondence Type: Web Form
Correspondence: Impose fines for misbehaving dogs or dog owners, but do not exclude well trained dogs and owners from our beaches. There are so few places for dogs and people to enjoy the ourdoors together. Please reconsider your proposal!

Correspondence ID: 964 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 19:32:02
Correspondence Type: Web Form
Correspondence: Dear GGNRA,

I am a law-abiding tax-paying positive contributor to the local community we call the bay area. I am also a graduate of Gunn High School in Palo Alto, an alum of UC Davis and a resident of Redwood City with employment tied to Silicon Valley.

I am also a responsible dog owner!

My Vizsla named "Diamond" is a graduate of numerous dog training classes and a dog show champion. She has been socialized to the maximum. She loves everyone and is a threat to nobody. She is also very well behaved under voice control.

But, she needs off-leash exercise!

For this reason, we visit Fort Funston weekly. It's heaven on earth for us. We visit with a smile treating the park and all visitors with respect. We pick up after ourselves and others. We always leave the park as good as we found it or better.

So, please do not punish the responsible dog owners by reducing the precious few off-leash parks found on the peninsula. Please keep Fort Funston off-leash legal!

Thank you.

Dane Mrazek of Redwood City.

Correspondence ID: 965 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 19:46:05

Correspondence Type: Web Form

Correspondence: My husband and I moved to the Bay area from the East Coast a few years ago, and one of our primary reasons for the move was the potential to enjoy the huge swaths of forests, trails and beaches. As the owners of 3 dogs, that enjoyment is only complete with their company.

We exert a great deal of energy in our dog-training, and in the course of our extensive use of the GGNRA's dog-friendly trails and beaches here in Marin, we have always encountered similarly-minded, responsible dog owners. This has been our experience, without exception.

It is lamentable that there is a minority of dog owners for whom responsible pet management and respect for the environment are not priorities. However, I implore you not to punish the overwhelming majority of us who

are truly respectful of the bounty of our land.

In particular, one of our favorite retreats is the beach at Muir Beach ? a tiny, gorgeous beach that is truly a local treasure. And while I myself have enjoyed many an hour on the sand, watching the waves, my joy at this beach is surpassed only by that of my 3 dogs. They love nothing more than to play in the (cold!) waves, chasing and playing with other dogs and children, and to stand guard with the wind in their ears. Some of our fondest memories with our dogs are from our time at Muir Beach? our new puppy being passed from child to fascinated child? our geriatric arthritic dog re-discovering her ability to run? our shy middle dog making careful friends with a like-minded hiker.

Our votes are to keep Muir Beach dog-friendly, off-leash and under voice control.

Of note, I have seen littering, destruction of flora, and disruption of fauna. And the few times I have observed this willful neglect of GGNRA stewardship have been at the hands of unfettered humans, not dogs.

Correspondence ID: 966 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 22:20:45
Correspondence Type: Web Form
Correspondence: Please keep GGNRA beaches and parks open to off-leash dogs. We rescue hundreds of dogs every year who have been mistreated or abandoned. They are NOT the dogs running & playing in GGNRA. These good dog-owners deserve to have a place to take their dogs for fun & exercise off-leash, in a well-defined area. I agree that not all beaches & trails should be open to dogs, but the ones that are most popular with dog-owners should remain open.

Thanks for your consideration.

Correspondence ID: 967 **Project:** 11759 **Document:** 38106
Received: Mar,05,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Since man has been a man dogs have been an integral part of his household and a preferred companion to the family. The owner should have the judgment to determine if the dog is educated/trained enough to graduate to walk parallel to him. If the dog however became a menace to others certainly the authorities will have authority vested in them by the common will of the community to act. The exercise of individual liberties end when

they begin to affect the rights of others, but they do not always do. To assume that will be an exaggeration of a police state that does not empower and trust its citizens, and I do not share that view.

Sincerely,

Cinta Loscertales-Telfer

Correspondence ID: 968 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 09:28:49

Correspondence Type: Web Form

Correspondence: I fully support your plan to require dogs to be ON leash in park areas.

Chrissy field is a virtual dog run at this point. Overrun with dogs off leash.

Dogs are never under voice command, despite what owners think.

My daughter has been jumped by dogs a number of times, being knocked down as well as receiving large scratches on her legs.

This has happened both at Chrissy field and Ocean beach.

We are also tired of finding dog excrement at the beaches.

Dogs do not have the "right" to run off leash unless they are on private property.

Please put them safely on their leashes.

Correspondence ID: 969 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 10:03:26

Correspondence Type: Web Form

Correspondence: I support dogs on leash everywhere in the GGNRA. Dogs should not be allowed to disturb wildlife in their natural habitat. Every time I go into the GGNRA, I see dogs off leash and destroying the park. Dog walkers feel that their dogs have rights above people. They believe that their dogs have a right to chase wildlife, and dig up the beautiful plants of the GGNRA. The GGNRA is a national park and thus it should not be a question that dogs should be on leash everywhere and banned in areas that are particularly vulnerable. In order to enforce these rules, volunteers should be utilized to give offenders tickets. If you decide that it is not appropriate for volunteers to actually give the tickets, they can volunteer to monitor the GGNRA and

call the park police to report offenders. Then the park police would give the tickets.

Correspondence ID: 970 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 10:14:51

Correspondence Type: Web Form

Correspondence: Mr Dean:

I am writing to ask you not to ban off leash dog walking in Rancho Corral de Tierra. I live in Clipper Ridge off Coral Reef Ave., in El Granada California. I have lived in Clipper Ridge since 1976. For the past 35 years, I have walked my dogs daily off leash in the hills above Clipper Ridge. I may spend as much as 2hrs a day walking them along the trails, in any kind of weather, at any time of the day. Most weekends are spent, hiking with them (off leash) along the trails that surround the area within the boundaries of Rancho Corral de Tierra. It is not unusual on a weekend, to load a day pack with water and food, and spend upwards of 6hrs in the back hills hiking with my dogs off leash. The majority of people that I come across while hiking in the hills, are hiking with their dogs. It is not unusual for me to only see hikers with dogs, and horse riders with dogs. If I do happen upon anybody hiking in back hills without a dog, my dogs are leashed immediately. In the 35 years that I have lived in Clipper Ridge, I do not know of any instances of off leash dogs causing a problem, we usually "police" ourselves. I am requesting that Alternative E be the preferred alternative. Alternative E states that "New lands begin as 36 CCFR 2.15 (dogs allowed on 6ft leash) and new lands with existing off leash use before acquisition my also be considered for voice and sight control in the future"

Thankyou

Jeff Carter

Correspondence ID: 971 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 10:28:11

Correspondence Type: Web Form

Correspondence: My issue with the plan is that I feel it doesn't include a balance between recreation, the environment and the small business in san francisco. I have 2 dogs and they have a dog walker 2x per week that takes them to the off leash area in fort funston. If the off leash area is restricted there will be more dogs in a smaller space and this will affect the dogs and the dog walkers business. More dogs in a smaller space could mean a greater chance or communicable diseases amongst the dogs, and possibly more dog injuries to

dogs and the dog walkers alike. The existing off-leash dog areas may become too crowded which could mean the dog walkers have to cut back on the dogs they accept resulting in a decreased income. Currently the justification for the plan is for environmental reasons, and while the environment is key, it's only part of the equation. I believe all parts of the equation must be better balanced so I opposed the off leash restrictions in the plan.

Correspondence ID: 972 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 10:42:25

Correspondence Type: Web Form

Correspondence: I actually do not own a dog, but do live on 48th Avenue at Ocean Beach and go to Ocean Beach daily. I actually adore dogs, and do not mind them running freely on the beach. However, one bad apple spoils the whole bunch—I have seen things like a dog run up to a horse and nip at them, dogs charging at unsuspecting children, etc. Feel like they should be on a leash, but the only way to enforce that is to get more police enforcement. Allegedly, that's the rule now, but believe me, no one does it. The main idea I support is that dog walkers get permits and the number of dogs should only be 3. I'm serious—any more than that is impossible to pick up their litter, etc. Again, you are going to have to hire more people to enforce this. There has to be some beach for dogs to run free. I purpose part of Ocean Beach, and have it CLEARLY marked. Same with Stinson Beach and Crissy Field. Thank you for letting me comment. Mrs. Nancy Hinze

Correspondence ID: 973 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 11:46:38

Correspondence Type: Web Form

Correspondence: My concern is with the restrictions proposed for Muir Beach, Rodeo Beach, and Oakwood Valley.

Oakwood Valley: It sounds as if the major problems associated with providing access to dogs are caused by dog walkers. Would it be possible to keep the access the way it currently is, which is my STRONG preference, if dog walkers were regulated?

I can see no reason why their commercial enterprise would be given any more latitude than, say, a hot dog vendor. I think that a maximum of three dogs per person, which is the maximum number of dogs allowed in Marin County, should be applied to everyone without exception. If dog walkers want to make more money than that per hour, they can walk the dogs on

leash elsewhere.

As for dog owners... there are hundreds of trails in the Marin Headlands that people can access with their small children, trails on which dogs aren't allowed, one only a mile or two farther down the road from Oakwood - a lovely trail that leads to Tennessee Beach, which I used to walk with my dog before it became part of GGNRA. Now, I never walk that trail, sigh.

To limit dogs to on leash only for any part of Oakwood trail, the only one in the entire Marin Headlands that is a dirt trail through the woods on which dogs can run free - under voice control, seems overly restrictive. To do so because some special species might be discovered and impacted some day, seems unduly forward thinking. And, it doesn't take into consideration that dog owners are your constituents, too.

I live in this neighborhood. I know it's a National Park, but it's also my neighborhood park. It has been sad to me to see how, though the Park's publicity, the numbers of people using it have increased over the years I've lived here. If you stopped promoting Oakwood Trail, the problems would decrease.

Muir Beach: It would be so easy to fence off the riparian areas, which would give dogs full access to the beach. Much easier than fencing a corridor up the hill from Oakwood Valley! My dog is not interested in the creek or the bushes. We run at low tide. Again, no more than three dogs per person, period, would be great. Beyond that, I can't see why dogs are or should be a problem. If people want a dog-free beach, they can drive a couple more miles down the road to Stinson any of the other beaches up the coast. Where is the next dogs-allowed beach?

I go to Muir Beach often during the week, and few people are there, even during the summer, and of those who are, most are people WITH dogs.

Rodeo Beach: Even in the middle of a summer weekend, the beach is relatively uncrowded and there are few people walking the loop up around the beach. Again, I see no reason to restrict dogs to on-leash only. The dogs I've seen at Rodeo run in the area near the water and the people are up higher.

Coastal Trail: I fail to understand how a dog on leash causes any problem. There are so few places someone can hike with a dog. Why remove yet another? I'm a woman and I often hike alone with my dog. I don't hike on any trails without my dog because it's so isolated in many places that I don't feel safe. My dog is my protection. You have removed most of the Headlands from me. Please don't take one of the last trails left to me.

Correspondence ID: 974 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 11:57:08

Correspondence Type: Web Form

Correspondence: i do NOT agree with the newly proposed off leash. it limits my freedom to run with my dog. it limits my dogs freedom to exercise and smell nature without restriction. san francisco is a dog friendly city. these restrictions will change that for everyone. i say NO CHANGES!!

Correspondence ID: 975 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 12:06:50

Correspondence Type: Web Form

Correspondence: Proposed Comment This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 976 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 12:25:47

Correspondence Type: Web Form

Correspondence: As a dog owner for most of my life (65 years), I am saddened by these harsh restrictions that the GGNRA is proposing for some of the most delightful places I have visited with my dogs (2 Rhodesian Ridgebacks and a Cardigan Welsh Corgi). I was born and raised in San Francisco and have taken such pride in the dog friendliness of the City of St. Francis, patron saint of animals. Marin County has always been congenial towards man's best friend

as well...now all these positive feelings I have are being threatened.

I have enjoyed all these areas that GGNRA is planning to restrict to dogs, no longer allowing them to run and play as dogs should be able to under voice control. We meet up with friends and their dogs at all these places: Muir Beach, Rodeo Beach, and Oakwood Trail in Marin County, and Chrissy Field, Ocean Beach, Fort Funston and other places in San Francisco.

For food, shelter and love, dogs give back so much to humankind, helping the blind, handicapped, epileptic, the deaf to live fuller lives; in law enforcement to help officers in keeping citizens safe; in search and rescue, to find lost people and children, in disasters to seek out the injured and the dead under rubble. My dogs help me control my high blood pressure and weight by getting me out each day to walk and run them off leash at select places on the Peninsula where we live. Their companionship is priceless. Dogs need off-leash running and socializing with other dogs. Places like Fort Funston are so unique. I have been many times with my dogs and I have never seen dogs jumping up on people or squabbling amongst themselves and there are often hundreds of dogs and their people out enjoying the sea breezes and fresh air on weekends. It is simply amazing.

Sharon C Johnson

Correspondence ID: 977 **Project:** 11759 **Document:** 38106
Received: Mar,05,2011 12:43:43
Correspondence Type: Web Form
Correspondence: I am very disappointed about the suggested changes in dog access the the GGNRA. Having been a 40 year Bay Area resident, finding places that are available for off leash and semi leashed dogs is growing smaller. Muir Beach and Fort Funston would not be the same places without dogs. I am vehemently opposed to the changes suggested in the report. Voting for the report is voting against the needs of a huge population of humans and dogs.

Correspondence ID: 978 **Project:** 11759 **Document:** 38106
Received: Mar,05,2011 12:48:27
Correspondence Type: Web Form
Correspondence: Please don't take the privileges away from those of us who are obeying the current laws. I love running my dogs off leash, and I love the environment that we have. I would like to see people picking up after their dogs better, and I often do it for them. I hope you can better enforce the current laws and not change them!

Correspondence ID: 979 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 12:52:50

Correspondence Type: Web Form

Correspondence: Please don't further restrict dogs and their owners--

Dogs impact the environment less than cars, mountain bikes or litter. Many people have jobs and don't have the time to both walk their dog and take a separate hike in nature. If they can't do them both simultaneously, they won't be able to enjoy the nature at all. When it then comes time to vote, they will be less invested and not vote to protect the environment.

There are other measures that could be taken, like increasing the penalty for leaving dog droppings, that might actually benefit park users.

Imposing these further restrictions would be a mistake.

Correspondence ID: 980 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 13:39:57

Correspondence Type: Web Form

Correspondence: I have already commented but wanted to add a suggestion.

Many off leash advocates are throwing out the statistic that they are only allowed to run their dogs off leash in 1% of the GGNRA. Nobody knows where that number came from and it is carried around like an ultimate truth. My experience is that the percentage of off leash areas in pedestrian accessible areas is way above 1%. I would suggest that you guys come up with the following statistics to refute these falsehoods.

% of GGNRA area that is accessible to humans % of that area that is accessible to off leash dogs in each of your alternatives.

Correspondence ID: 981 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 14:18:11

Correspondence Type: Web Form

Correspondence: I have been a resident of the outer sunset district of San Francisco for 5 years, and while that is not a considerable amount of time I have chosen to live in this neighborhood for the open space and dog friendliness of both the neighborhood and Ocean Beach. I am completely aware of the leash laws on ocean beach and at which times of the year I am allowed to have my dog off leash. I find it very hard to understand the environmental impact study in

relation to the natural wildlife or disruption of the natural habitat when the rangers are driving 4 wheel drive vehicles up and down the beach polluting the neighborhood as well as the beach. The ocean liners at sea put more garbage on our beaches every day than our beloved dogs can possibly disrupt the environment.

The outer sunset is a dog lovers dream neighborhood and Ocean Beach is a huge part of the reason we chose to live here. Please consider alternative versions to the draft of the proposed Dog Policy on Ocean beach and other currently dog friendly beaches in the SF area.

Regards,

Evan Nielsen

BTW. I have raised my beautiful black lab at ocean beach his name is Rallie, and he has never even looked at a Plover.

Correspondence ID: 982 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 14:55:16

Correspondence Type: Web Form

Correspondence: I assert that my right to dog-free space is equal to any right a dog owner has to bring his/her critter with him/her to the GGNRA. "Variety of user experiences" is an interesting term. For example:

1)We assume "Pleasurable" or at least "non-harming" experience, right? But dogs have ruined many visits for us in recent years. My partner and I are really sad and genuinely angry at being continually faced with off-leash dogs in the GGNRA! Unfortunately she has been afraid of dogs for most of her life. We love and respect the beauty of GGNRA; we feel lucky to have structured -- not unlimited --access. We accept parameters that support the wellbeing of the whole ecosystem in GGNRA. This appears to be not true of people who would support bringing dogs -- particularly, off leash dogs -- into these areas. Dogs are not native animals to the GGNRA; their impact is NOT negligible.

2)Who are the "users?" Dogs are not people, they should not have nor do they deserve the access rights that humans do. Users include those for whom unpredictable, off-leash dogs present a fall hazard (me during rehab!) and those who for whom rambunctious dog is worse than an annoyance but an actual threat.

Correspondence ID: 983 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 15:28:21

Correspondence Web Form

Type:

Correspondence: Being fortunate to live just a short walk to the GGNRA in Marin County, and a frequent user of the park, I am firmly opposed to any further restrictions and prohibitions of dog usage in the park. Responsible dog owners, which I consider myself one of, respect and are fully capable of minimizing the impact to the parks environment and other people using the park without further intervention of the Park Service.

Respectfully submitted,

Steve Grasso

Correspondence ID: 984 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 15:45:23

Correspondence Web Form

Type:

Correspondence: The Preferred Alternative the DEIS report recommends for Fort Funston would keep an off leash dog on the sand.

My dog, for physical and health reasons, cannot walk on the sand for long. She has to be on a paved area. You are effectively excluding my dog, and us, her human companions, from recreation activity at Fort Funston by keeping us off the Sunset Trail.

The report does not address the needs of citizens with physically disabled dogs who have a right to off leash recreation.

The contract with the city of San Francisco in 1979 guarantees that recreational use in this urban park by all its citizens be preserved.

I strongly oppose the harsh restrictions GGNRA recommends in their DEIS report.

Correspondence ID: 985 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 16:06:27

Correspondence Web Form

Type:

Correspondence: Dogs need areas where they can run around and be dogs. It is import for their development into healthy, stable, calm animals. Closing off-leash parks will lead to more problem animals and thus more problems for the city. If you are going to close parks like Fort Funston you may as well ban dog ownership because you will just be creating more problems for yourself.

Correspondence ID: 986 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 17:11:41

Correspondence Type: Web Form

Type:

Correspondence: To the NPS,

I'll start by saying that I strongly protest banning dogs from the SPPA at Ocean Beach.

As an individual with a BA in Biology from Princeton and a Masters in Environment Management from Duke, I feel highly qualified to make the following comments. In addition, I spend 2007-2010 working as an ecological risk assessor for a Bay Area environmental consulting firm, so the planning and execution of documents like the GGNRA Draft Dog Management Plan / Environmental Impact Statement was my job during that time. I am very familiar with the process required to create an EIS, and I am disappointed with the negligence the NPS has exhibited with this particular effort.

I live on Ocean Beach, and it is on the beach where I run with my dog (on a leash) every morning and walk with him in the evening. I have had ample opportunity to observe shorebird behavior on the beach, and I feel like the shorebird "situation" on the beach has been grossly misrepresented by the NPS.

To quote the EIS, "the seasonal leash restriction is often violated in the SPPA; dogs would continue to disturb and/or harass the birds, potentially limiting their use of preferred habitat, and to interrupt roosting or foraging behavior, which causes the expenditure of energy and could affect migration and breeding; shorebird numbers are high, visitor use is high, and coastal habitat is extensive at this site."

I will not argue that dogs, both on and off-leash, occasionally disturb the shorebirds along Ocean Beach, but so do ALL of the following: - the hundreds of thousands of human visitors to the beach each year - how can you possibly blame the dogs for disrupting the shorebirds without putting even more blame on the small children running around screaming, the kids kicking the soccer ball, the teenagers leaving trash and debris all over the beach, the runners running through flocks of feeding birds at sunset, etc. I would argue that just this one group has a far more negative affect on shorebirds than the dogs on Ocean Beach ever would. Are you going to ban humans from the beach as well? - the kites that fly over the beach every day - the silhouette of an airborne predator is far more disruptive to a flock of birds than a land-bound passing dog would ever be. Are you going to ban

these too? - the bikes/buggies/strollers/etc that roll along the water each day - do these not resemble dogs and/or other land-bound predators? Are you going to ban these too? - horses - Again, highly disruptive to a flock of feeding shorebirds at sunset. Are you going to ban these too? - the homeless - I can't tell you how many times I have see human feces, drug paraphernalia, tents, and trash along with homeless individuals in the dunes at Ocean Beach. There is no doubt that activities from this group are highly destructive to both the environment and cultural resources at the beach.

I think I have sufficiently made the point that banning dogs from Ocean Beach will not come close to solving the perceived "problem" of use and snowy plover protection at the beach. You are unfairly punishing responsible dog owners for something that is not at all our fault. There's at least 50 people that use Ocean Beach to every dog out there...yet you choose to blame the dogs. Again, I will say this is negligent and disappointing coming from the NPS.

For those of us who have well-behaved canines and moved out to the beach to join a outdoor-loving community of like-minded people, I again want to reiterate that I strongly protest banning dogs from the SPPA.

I would welcome questions or contact with regards to my comments. Thank you, Dale Maffett

Correspondence ID: 987 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 18:14:22

Correspondence Type: Web Form

Correspondence: I agree with the proposed dog management plan. I like dogs but I do not enjoy being run over by them or having to step over their feces in the parks. Many dog owners seem to think that they do not need to pick up after their dogs because they are "in nature." My family and I were spending time at Point Reyes' North Beach one day a few weeks ago when we saw another family arrive with two dogs that were running off leash in and around the dunes. One of the dogs was digging up the native plants, while the other one was digging a tunnel in a dune. This kind of behavior is typical in my experience: out of 5 dog owners, there are usually two who allow their dogs to run all over the space, regardless of the other people or the native plants in the area.

Bottom line: There should be special open spaces specifically for dogs.

Correspondence ID: 988 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 18:22:17

Correspondence Web Form

Type:

Correspondence: After reading the reasons behind the proposed changes to the GGNRA's pet policy, I am outraged that such arbitrary, illogical and ridiculous plans have been put forth to the people of San Francisco. I walk my dog everyday at Crissy Field and witness nothing but well behaved, happy dogs and happy owners or professional dog walkers walking their dogs. The off leash dog areas is a major reason why me and my husband chose to move here in July of 2010. We are both devout environmentalists and would never engage in behavior that would harm any natural resource. I am particularly concerned with the plans for Crissy Field but would also like to voice my concern now that I think the plans for Fort Funson, Fort Mason, Ocean Beach, Baker Beach are equally as ridiculous.

The fenced off animal sanctuary areas already keep dogs and people out and I have always thought that that was a good trade-off. Protected areas and areas where people and dogs can walk and run (off leash). Can you please tell me how an on-leash dog has less effect on the area than an off-leash dog? All of the dogs run straight from the airfield down to the beach anyway and the ones that might not, just run and roll around. How are they hurting natural resources for future generations!?

We take great pride in training our dog and she is always under voice control when she is off leash. This is the case with almost every other dog and owner at Crissy Field. Of course there are some dogs that aren't trained or are aggressive and shouldn't be allowed in public or off leash at all but you can't take this privilege away from everyone else when the amount of "bad" dogs is so small. Perhaps you could work with the city to increase the punishment for "unruly" or "aggressive" dogs instead of banning off leash areas for everyone?

If you limit the amount of off leash areas to what you have proposed (your preferred alternative) then you're going to have too many dogs and people in one place and that will cause way more problems than what you perceive to be occurring right now. Have you been to Crissy Field? Do you have any idea of what a great place it is? A large reason for that is because dogs and people can run and play on the beach in the water.

Many people who bring their dogs to the beach use the parking lot west of the tidal marsh. All of your plans make that part of the air field "leash required" so, there is no place that you can go from the parking lot to the beach that is all off leash. Even if they use the larger parking lots to the east, there is no off leash areas near the beach so we all have to deal with leashes no matter what with your plans. We never have our dog on a leash now because she doesn't need one but now you wish to legally force us to put one on her for no reason. She's never exhibited any bad behavior ever and is

always under voice control.

Now I'm going to address your ridiculous and short sighted "reasons" for proposing your plans.

1.) preserve and protect natural and cultural resources and natural processes

I mentioned this above but, how exactly do dogs diminish natural resources? They run on grass and play in the water. What affect could they possibly have on "cultural resources"? This is so ridiculous.

2.) provide a variety of visitor experiences

There is currently a wide variety of visitor experiences. That is why the GGNRA is one of the most visited parks in the U.S. Again, how do dogs take away from this?

3.) improve visitor and employee safety

There are some dogs that are overly aggressive. Many of them happen to be Pit Bulls. I think that some dogs should be banned from public areas but most dogs. Almost 100% of dogs are good natured, loving animals who just want to run on the air field and play in the water. It's not fair that that small number of dogs ruin it for everyone else. How about you just ban dogs that have official complaints about them? There has to be a better way to deal with this than what you have proposed.

4.) reduce user conflicts

This is a lot like #3. There is a small number of dogs who cause conflicts but again, most dogs don't. The VAST majority of them are good natured, full-loving animals.

5.) maintain park resources and values for future generations.

How does a dog running on grass and playing in the water have to do with any sort of natural degradation?

I know that these plans are in the interest of environmental protection but honestly, you're not going to protect anything by forcing people to put leashes on their dogs. How about focusing your attention on the serious environmental circumstances in this country rather than spending your time making a bunch of San Franciscans put leashes on their dogs.

Sincerely,

Lindsey Guest

Correspondence ID: 989 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 20:21:20

Correspondence Type: Web Form

Correspondence: I feel very strongly that the proposal to limit off-leash areas in the GGNRA would be a dangerous and ill-advised plan were it to be enacted. I have lived in San Francisco the past 27 years, the last 13 of them in the Marina district and just blocks from Crissy Field. I own a 7-year old Vizsla dog, Czar, and use the GGNRA areas almost daily for our walks and for my fitness routine which usually involves Czar and I both running together. Czar is a well-trained former show dog that responds to all voice commands and, in seven years, has NEVER had an "incident" of any kind with another dog or a human.

In recent years I have been struck by how fewer and fewer areas in the Bay Area are being made available for off-leash dogs. It has been proven that dogs that receive proper exercise and socialization with other dogs are better behaved, happier, healthier and bring greater joy to the lives of the people that own and love them. Restricting more areas from being off-leash will directly infringe upon this. Dogs need vigorous exercise. Walking alongside an owner while tethered to a leash is not adequate exercise by any reasonable definition. Additionally, dogs need to interact with other dogs and other people to remain well-socialized. By removing more and more opportunities for dogs to exercise properly and be socially acclimated to other dogs and other people breeds a vicious cycle that results in dog "events" such as fights or bites. Ironically, a plan to remove off-leash areas due, in part, in an attempt to reduce dog events such as a fight or bite will only ensure more such events. The facts support this and are not in dispute.

The Bay Area is a model envied the world over as a place of tolerance, diversity, and shared responsibility. Part and parcel of this reputation is the core notion of peaceful co-existence among different peoples, among bikes and motor vehicles, and among humans and animals sharing our beautiful natural resources. However, this proposal to limit off-leash areas effectively dismantled this worldview and installs a worldview that says, "No. Humans and dogs cannot peacefully coexist." I reject that wholeheartedly. There are already appropriate remedies to deal with poorly trained dogs and irresponsible owners. Those laws and ordinances should be enforced.

I ask you to reject this proposed measure and to protect areas in the GGNRA that are currently off-leash from any further infringements or threats of removal.

Correspondence ID: 990 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 23:44:52

Correspondence Type: Web Form

Correspondence: Don't deplete the few trails that you already have open to us with dogs. We only visit the Marin Headlands because there are trails available to dogs, and removing the trails close to the water means that we will be stuck on trails with no view of the ocean and the SF Golden Gate Bridge. HOW ABOUT YOU OPEN UP EVEN MORE TRAILS TO THE DOGS!!!! I was on the trails today with my dog and we passed other folks on the trails, and I counted a total of 33 dogs that we passed in the 90 minutes that we were on the trails. It would be RIDICULOUS and a poor choice to take away the option for us dog-owners to take our dogs on the trails.

If you take away the current trails, you will lose my support and my cash donations that I currently give. CA already sucks with allowing so few trails to dog owners, don't join the other idiots who closed off other trails to us.

Thank you.

Correspondence ID: 991 **Project:** 11759 **Document:** 38106

Received: Mar,05,2011 23:45:07

Correspondence Type: Web Form

Correspondence: I have been a long time friend of residents and now have my own dog that I would love to walk on Ocean Beach. I cannot fathom the thought of having to drive myself and my dog to a part of the beach when I have always been able to enjoy this aspect from their front yard. This is a really important thing to me and my family and I will be so disappointed if this happens.

Correspondence ID: 992 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 00:01:40

Correspondence Type: Web Form

Correspondence: With all the amazing parks that are in California, there are so few that allow dogs. Marin Headlands is one of those great parks that allows dogs and it would be a shame if the limited amount of trails that dogs are allowed on is further reduced. Owning a dog means that when I go hiking, my dog comes with me. The only reason that I visit Marin Headlands is because it allows dogs. I will not return to the headlands in the future if trail access for dogs is diminished.

Correspondence ID: 993 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,06,2011 00:31:58

Correspondence Web Form

Type:

Correspondence: The current enforcement of dog leash laws in the Fort Mason area has been an improvement. Previously there was little control by dog owners of their pets.

The leader in San Francisco of a dog owner demonstration said on TV today, 3/5/2011, that "it is just a few dog owners." That of course is true. The reporter did not ask the question the NPS must ask: did anyone who owned a dog go over to an inconsiderate owner and say something to the irresponsible owner.

I can tell you from personal experience that this never happens. We have been in groups in that area and noted many occurrences of dogs disturbing people. It often accrues to borderline chaos with a chance of real injury for children or elderly adults. Even with dogs on leash a common sight is an owner on a narrow park path with their dog on the other end of the path coming toward you with no effort to allow you to pass. Owners more than their dogs need training in simple human consideration.

Dog owners want to be accommodated in *their* needs - it really isn't about dogs at all - but feel no responsibility collectively to monitor their cohort. This is a familiar form of narcissism and adolescent thinking in American society that causes this to be a hot issue.

Laws exist to protect the public, as do rules governing behavior in public spaces. The only authority that can protect the public from irresponsible dog owners is the NPS. Keep the current rules in place. Enforce those laws with regular patrols. All dogs on leash except in the currently prescribed areas - this is the only realistic solution.

If people want to own dogs in the city it is fine. Dogs are wonderful companions. But there comes with it a responsibility. One of those responsibilities will require of the owners is that they exert themselves and their pet a bit, inconvenient as that may be; Fort Mason is but a mile from Crissy field. The precious dog and privileged owner can use the exercise. The public can use the peace of mind. If dog owners are unhappy they can freely choose to live in another locale. Move or adhere to the current public friendly rules.

Alternative-A must be adhered to.

Correspondence 994 **Project:** 11759 **Document:** 38106
ID:

Received: Mar,06,2011 07:36:20

Correspondence Web Form

Type:

Correspondence: I fully support the Preferred Alternative Plan for Ocean Beach. As a resident of the Sunset/Parkside neighborhood AND an owner of a young mixed breed hunting dog, I find there are plenty of alternative off leash options to take my dog that are convenient to get to. Stern Grove and numerous areas of Golden Gate Park (not to mention the many small neighborhood parks) are just a couple of the many alternatives where my dog can get sufficient exercise off leash while not harrassing, threatening, or trampling on native species of wildlife or plants. Many people own a dog because they enjoy and appreciate the outdoors. Dogs are also a manner of obtaining exercise and maintaining good health for oneself, i.e walking an extra mile to the North end of the beach. It is disheartening to see so many dog owners not willing to compromise and unable to see the big picture. Even with decreased access in some areas of the GGNRA, San Francisco would still be one of the most dog friendly cities in the country while also maintaining natural habitat and protection for wildlife. That is the city I want to live in.

Correspondence ID: 995 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 10:08:47

Correspondence Web Form

Type:

Correspondence: Please do not change the current laws. We need more places to run dogs off leash. Jim Shier

Correspondence ID: 996 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 10:18:16

Correspondence Web Form

Type:

Correspondence: All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.

It is fair to ask dog owners to accept certain limits for areas where their dogs may play when the survival and wellbeing of so many wildlife animals and plants is at stake.

Im a dog owner and I miss her being able to run free on Ocean beach, but now that i am aware of the snowy plovers and other birds, i dont run her there and am disturbed by the owners who ignore the signs and to clean up after thier dogs.

thank you, lr

Correspondence ID: 997 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 10:26:32

Correspondence Type: Web Form

Correspondence: This is a recreation area, and one of the recreations we like is exercising with our dogs. Limiting the areas in which we can do this is taking away one of the important sources of exercise for both humans and dogs. We need more education about what is appropriate use of the common areas, not more restrictions.

Correspondence ID: 998 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 10:29:49

Correspondence Type: Web Form

Correspondence: Hello,

I strongly object to GGNRA's Dog Management Plan/EIS preferred alternative D, which would ban dogs from all new lands, including Rancho Corral de Tierra. A total ban on dogs is extreme. Alternative E makes more sense: "New lands begin as 36 CFR 2.15 (dogs allowed on 6 ft leash) and new lands with existing off leash use before acquisition may also be considered for voice and sight control in the future."

For the past 10 years, I have walked my dog on the Rancho trails behind my El Granada neighborhood at least daily and often twice a day. Hiking these trails with my dog is how I met most of my neighbors, and not incidentally, my partner. Some neighbors, including me, moved here specifically because this area has a dog-friendly reputation: residents from Montara to El Granada have been socializing with our dogs on Rancho for over 40 years and have formed a whole community around dog-walking.

My dog provides the motivation to get up and out on the trails every day, as well as companionship and protection: as a woman, I do not hike alone. The trail time doubles as walking meditation and fitness training, getting my mind set for the day ahead and, at day's end, providing an often-needed perspective re-set. My dog benefits in that he's well-exercised and socialized with other dogs and people. A well-exercised, socialized dog is a happy, well-adjusted, and non-aggressive dog. In fact, my dog is a certified therapy dog.

Rancho currently supports a mix of users that works. Equestrians, cyclists, and dog-walkers share the trails, get along, and self-police. Rancho could be a model for what's being done right and how disparate user groups can get along. If GGNRA is concerned about management of multi-use trails, please

consider creative solutions such as setting aside early morning hours for off-leash dog walking, then starting at a posted time, all dogs required to be on-leash. Such solutions have worked well at locations in Washington state and Santa Cruz.

GGNRA is treating all "new lands" as pristine wildlife areas worthy of the most stringent environmental controls, regardless of location or history. Christine Powell, developer of the draft plan, is quoted in San Francisco Chronicle columnist Tom Stienstra's column of January 21, 2010; she refers to Rancho as "virgin". It is not. The northern end of Rancho, encompassed by Montara, Highway 1, and McNee Ranch State Park, is historic ranch and farm land. The southern end, behind El Granada, was slated for development and includes graded fire roads and hills graded for building. The land is scarred by dirt bike tracks; one area was used as a shooting range for many years. An area known locally as "Flat Top" is a popular party location for teens from Montara to Half Moon Bay. As to the effects on native wildlife, Ken White, president of the Peninsula Humane Society & SPCA, stated that the Humane Society's wildlife rehabilitation staff reviewed and analyzed the Rancho site and proposal and concluded that there is "... no observable reason related to the protection of native wildlife which would justify denying access to off-leash dogs in the area. If there was impact on wildlife, it happened long ago. Wildlife continuing to use this area are most likely well versed in people, bikes, and dogs and probably avoid the area during the day. The overall area is very large and wildlife have adequate space to avoid people and dogs."

The neighbors -- those of us who walk our dogs on the land -- are the ones who keep an eye out, notify POST and the sheriffs of incidents or problems, and clean up the messes left by partyers. It seems ironic that dog walkers are the ones who are out there every day, keeping watch on the land, and we're now being kicked out.

We just want to walk our dogs!

Thanks for your consideration.

Sincerely,

Risa Galant

Correspondence ID: 999 **Project:** 11759 **Document:** 38106
Received: Mar,06,2011 10:40:04
Correspondence Type: Web Form
Correspondence: Dear GGNRA Officials:

I am a 20 year San Francisco resident. I recently rescued a lab mix puppy (now 7 months). I spend approximately one hour, 5-6 days a week at either Baker Beach, Chrissy Field, or Fort Funston. Use of these areas with my dog is part of the great quality of life of San Francisco and is a fantastic community building tool.

I have read the materials, and understand that I should be specific about registering my objections to the plan and the draconian clawbacks (which frankly seem a bit absurd to me); instead I would simply like to share what I view as the tangible benefits to both dog owners and non-dog owners of allowing off leash use.

Community Building 1. Human interaction and community building. The dog areas are very social for the human companions. People share a common interest and chat while the dogs play. I cannot think of another forum or activity in San Francisco that has allowed me to meet many neighbors that I would not otherwise meet. I then run into these neighbors at the car wash, the grocery store etc. -- it has been a remarkable experience in making our City feel more and more like a community.

2. Learning from dog owners. The things I have learned about raising a happy dog from the other dog owners at the beach have been invaluable. These conversations take place as the dogs wrestle and chase balls together.

3. Full use of areas. 90% of the time when I visit Baker Beach - the only people on the beach are dog owners walking or running with their dogs, and perhaps some fishermen. There are many drizzly mornings when I am the only person on the beach. I cannot recall any people, other than hanggliders, using the wind blasted dunes of Fort Funston, and few, if any, families make the walk down to the beach. To prohibit dogs would be simply clearing the beach. That does not seem to be a good result.

I cannot comment on the behavior of dogs or humans on the handful of sunny Saturdays when Baker Beach is crowded. As a responsible dog owner, I simply avoid taking the dog to the beach after 11am on those days. I would guess that the folks that allow their dogs off-leash on those days, are not the same dog owners that I encounter every morning. Perhaps restrictions and punishments should be limited to those dog behaviors and owners.

Benefits to my puppy that also benefit the community: 1. Exercise to keep my dog well behaved and happy when she is leashed on the sidewalk (and at home) 2. Socialization to prevent dog aggression 3. Training from older dogs. As a responsible owner, I have invested in 12 weeks of training classes to teach Olive the basics; however I have found that when it comes

to perfecting the manners of recall and interaction with humans - the most effective and fastest training for my puppy is mirroring the behavior of older dogs. This happens at the beach.

Before I rescued Olive, I regularly exercised at Chrissy Field and Baker Beach as a non-dog owner. In my opinion, the presence of the dogs and their owners- socializing and playing enhanced my experience. I find it much more pleasant to be around people enjoying their day and their community than to see an unused beach.

I support enforcement and education. I support charging dog walkers a permit fee to pay for upkeep to the beaches and parks, enforcement of regulations, and education. I employ a walker 3 days a week and would gladly incur the incremental cost of the walker to support these programs. I would not oppose time restrictions on the popular beaches, such as Baker Beach.

I hope this letter has been helpful.

Nancy Egan

Correspondence ID: 1000 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 11:14:06

Correspondence Type: Web Form

Correspondence: To have spent this much time, and to have come up with something as unsatisfactory as this draft is truly amazing, unless one takes the view (as I do) that the needs of users were never taken into consideration. The Park Service wants this area of ours to be something we don't have access to, except as something to look at. This can't be the kind of place that the Bay Area calls it's own, and it is ours. I am not saying that the sites covered in the DEIS should be used only in the way they are used now(though from my point of view that would not be a problem), What I am saying is that no alternative in this proposal is taking into consideration what really needs to be taken into consideration: ways to better share the lands between its users who might not have the same idea about how best to use it. It was not entrusted to the NPS so that they could lock us out and sell us coffee table books with pictures of what we cannot use or touch.

I have seen and heard people saying that the one percent we now have for off-leash use is the same land that people want to use for other uses, but no attempt has been made to come up with ways for us to better share the space, or to increase the amount of GGNRA lands that we have access to (unless you count relegating off-leash users to a truly tiny area where the kind of use we now engage in would be impossible, and where the

concentration of users would be so dense that conflicts would inevitably develop between dogs and between humans). There is a ton of land in San Mateo County, but no off-leash areas. What little space there was in Marin would be taken away in the planned alternatives. I have been trying to shy away from saying that that the NPS is out to get us dog owners and walkers, but if I start taking a good look, I can come to no other alternative.

Off-leash exercise cannot be done in over-sized playpens (fenced or not). The main idea (for active dogs at least) is to let them behave naturally, and run, over good sized distances. These behaviors are in them, and have to be allowed come out, if you want to avoid neurotic crazy-dogs that will indeed act badly. The trip out to the park is completely different from the trip back, because on the way back, they have been allowed to run that pent up energy off. In other words, they are tired and happy.

You may not care about dogs' exercise needs, and you may not think that a description of those needs is relevant here. But it is. This is our land, and these are our dogs. There are ways that we could come up with to meet the needs of our human and canine park users, but the Park Service has spent decades (and a fair amount of money no doubt) to come up with several alternatives that only try to meet the needs of groups that don't want us to use the lands, but instead want it to be a little museum-like space where native plants and species can be allowed to rebound and where people are only allowed on paths, behind ropes, and where dogs are allowed restrictively and temporarily, the final goal being the no dog policy in place in most national parks. Once again, this not a national park. We shouldn't have to tell you that over and over. That knowledge should be required of you as part of your job description if you have anything to do with this decision making process. I can say that because I am one of your bosses. I am a Bay Area resident (SF), and a frequent user of the GGNRA. I am there even on the days that not many people show up due to the weather. You ought to have to listen to people like me. Maybe you will if enough of us say it loudly enough.

Now as far dogs and their effect on the area is concerned, you simply can't begin from the position that the canine presence there is detrimental. You have to prove it. You have to prove that dogs harm the environment, and you also have to show evidence of that fact. I would argue that you also have to convince the people that that harm (once proven) outweighs the benefits that canine companionship and fellowship provide, and that the only thing you can do about it is kill dog use. Otherwise, dog use should be allowed to stand.

As a daily user at Fort Funston, I have seen a great deal of what goes on there. As far as dogs and plants are concerned, that space is mostly ice plant and a few trees. I would have to admit that I have seen dogs playing with

sticks, and that those sticks probably once were parts of those trees. I would also have to admit that there is one tree in particular that the dogs like to climb into, and that they have worn a little bark off of it. I would have to admit that occasionally you see a dog running around with a piece of dried up ice plant in its mouth, and that some of them like to charge groups of crows to see them fly away. I'll even cop to the fact that every once in a while one manages to dream the impossible dream, and catches himself a gopher (I have never seen it but I know it has happened). Ice plant and gophers are not endangered, nor would we miss them to awfully much if their numbers were reduced, but I doubt that's happening, and the crows are playing an age old game with the dogs which I have watched dogs and crows play over my many years. As far as the bark on the tree is concerned, don't blame the dogs. Their owners told them to get up there because it's cute, and they do it repeatedly because they got a sausage or something. The sticks are lying around on the ground.

The bank swallows burrow into the top part of the cliff, where even the best cliff climbing dog cannot get to them. Dogs are not allowed in the area above the burrows, and even if they were, would not dig down deep enough to disturb the nesting birds. The Snowy Plover as I understand it nests on the beach itself, and I have never seen the nests though I walk the beach at Funston daily. This could be seen as a reason not to allow people on the beach so that the plover can establish some nesting sites, but instead it is seen as a reason to keep dogs out. There is plenty of beach for the snowy plover to use elsewhere, and if there are established nesting sites at Funston or elsewhere, they can be protected with fencing as has been done elsewhere. Instead what the NPS has done(this at Ocean Beach)is to destroy more snowy Plover habitat than our dogs will ever have a chance to disturb by moving sand around with bulldozers as has been documented on the Ocean Beach Dog website, complete with before and after pictures.

Every once in a while I hear about how my dog is causing cliff erosion at the beach at Funston. That one really makes me laugh. Do they think that off-leash dogs caused the former batteries and their gun racks to end up on the beach.

That's enough for now. See you next time.

Correspondence ID: 1001 **Project:** 11759 **Document:** 38106
Received: Mar,06,2011 11:25:28
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean,

With regard to the proposal to limit or ban dogs from the local federal park

areas in the GGNRA; I am a native to Marin county a life long dog owner and COMPLETELY SUPPORT THE PROPOSAL TO LIMIT OR BAN DOGS FROM THESE PARKS.

I have enjoyed hiking, biking, horse back riding, picnicing, in every park in Marin County for the past 50 years and have become disusted with the smell of dog feces that has practically turned these local jewels into toxic waste sites.

I see single professional dog walkers with five or more dogs off leash; how can they possibly clean-up after five dogs? The answer is they don't. The majority of dog owners are just as bad . . . if this segment of the population cannot be responisble, which they have proved not to be, they must be banned. The only other option is to hire a corps of poop-police to hand out tickets.

Thank you for concern and for being a steward of our local federal parks.

Kind regards, Jill Janson

Correspondence ID: 1002 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I believe that the GGNRA is not truly taking into account what an off leash site means to dog owners. I have a dog that needs a good long run to be happy as being a working dog breed it is not able to get this on a leash. But also beyond that the space at Fort Funston in particular is good for a human's body and soul. There are so many areas around here that either restrict or don't allow dogs this small percentge of the GGNRA is not affecting those who want to be without dogs. I am including what I think should be down. I do not agree with this plan at all!

The GGNRA should develop a new alternative, the A+ Alternative, that will better balance the recreational needs of the Bay Area with protection of natural resources. The DEIS calls the "No Change" Alternative "A". This is the 1979 Pet Policy with some restrictions, particularly restrictions on off-leash at Ocean Beach, Fort Funston, and Crissy Field because of the snowy plover and native plant restorations. More than one-third of Bay Area residents have dogs and we now know the importance of off-leash recreation for dog's physical and mental health, as well as the importance of the significant social communities that develop where people recreate with their dogs off-leash. This large segment of Bay Area residents should not be restricted to significantly less than 1% of GGNRA land (that is how much GGNRA land is available for off-leash recreation in Alternative A) to have a

satisfactory park experience, especially since there is little scientific evidence supporting restrictions on off-leash. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the Bay Area. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and education where problems arise. Enforcement of already existing regulations should target irresponsible dog owners who create the few problems documented by the GGNRA, while allowing responsible dog owners to continue their traditional off-leash recreation without harassment.

Correspondence ID: 1003 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 11:46:16

Correspondence Type: Web Form

Correspondence: I am a senior citizen and have live here for 30 years. I and my dogs have walked in the Ft. Funston unleashed dog area for many years. It is the best place in our urban area for all of us to breathe fresh air and get some healthy exercise. The dogs and people do not harm the area. Ft. Funston was not a 'pristine' area, but was a military area long before dogs and people began using it.

It is disdainful of our citizens to attempt to squash the current use of Ft. Funston. The proposed policy is arrogant and ridiculously rigid. It is a very bad idea. Do not implement it.

Correspondence ID: 1004 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 12:30:17

Correspondence Type: Web Form

Correspondence: Re: Fort Funston

Argument in favor of the status quo with room for compromise. Please read on:

I believe that the GGNRA thought they did their best to try to meet the guidelines set forth to examine the environmental impact on these National Park Areas but I am not sure they considered the other possible problems

that would occur if they go with their recommended options?outcomes that would likely have a more extensive negative impact. Please read on:

1. I have been visiting Fort Funston for 17 years, 10 without a dog and 7 with one. During that time, I have brought my children there to get exposed to dogs and develop affection for them as opposed to fear. The dogs there are so friendly and non aggressive that this was the perfect place. I have brought out of town guests and they have stood in awe and envy of this wonderful place to enjoy, nature, California vistas and dogs and people? in a City to boot. Cities tend to isolate people from one another and here is one of those rare, and special places where you almost feel like you live in a small town with a sense of community?everyone running free and getting along. I get to know people who live in completely different parts of the City and we get to greet one another like neighbors when we do our ritual dog walks. Do you really want to destroy a San Francisco icon? When is the last time you visited?

2. One argument I have heard concerns the dangers of dog bites and dog fights. I am skeptical that the instances of dog bites are greater or worse than those in the community at large. Of course they are greater than in places where there are no dogs?.but this is not grounds for eliminating off leash dogs. I mean do we restrict teenagers from parks because they create a risk of broken glass?, or men from the parks because they increase the chance of rapes occurring?, or restrict children because they chase birds (and they do) or because of the litter they leave behind? In fact, I would argue that dogs who are socialized at places like Fort Funston?socialized off leash being key here?this opportunity for dogs to socialize with humans and other dogs makes them better canine citizens and reduces any potential dangers they might pose in the community. I feel pretty safe in saying that the "vicious dogs" are not dogs that are socialized at Fort Funston. It keeps our City safer and our people safer and healthier by providing a place for dogs and people to run free and get exercise. Dogs as pets improve the health of the people who own them?and it is the obligation of the community to provide a place for those dogs and people to exercise together. On leash exercise is often insufficient and holding a leash can cause elbow and shoulder problems for owners.

3. What will happen to Fort Funston if you put these restrictions in place?even the shared plan? Because of the wonderful opportunity it provides, Fort Funston is heavily utilized by people and their dogs. Given the numbers that enjoy this wonderful place, it is always relatively spotless, free of litter and safe. This is because canine owners are some of the most civic minded, environmentally aware, concerned, involved and caring citizens. They do their best to take care of the place that they use so that it will continue to be there, they take responsibility for their animals and they pick up the feces, they do not litter, and they take enormous pleasure in

nature. These people come because it is OFF LEASH and provides an opportunity for them and their dogs to roam free. If these restrictions go into effect, they will no longer come except occasionally. While at best I will be able to say I told you so, Fort Funston will not then be visited by all the people who have been waiting to come for the time when dogs are eliminated. There will not be loads of dog fearing kids and adults, dog fearing elderly and dog fearing physically challenged people wandering the trails of Fort Funston. It will be empty and deserted; in short time it will provide the perfect location for shady deals, drug users and homeless encampments, and it will not be a safe place nor a clean place to visit. It will no longer be a place of civic pride. And as for environmental impact, I am sure the litter, broken glass, beer bottles, syringes etc. that are left behind will have its own sad environmental impact. Which of these options pays a greater price? Has anyone considered this? Are you really convinced that lots of people will come to use this park when you severely restrict off-leash dog use? These are the same people who currently do not use all the other parks available to them where dogs are not permitted at all. Or if they do use the other parks, then they are satisfied to have other places to go.

4. The argument about disabled people? Okay, my backup is anecdotal but so is yours. I have a number of disabled friends who have dogs and use wheelchairs. They adore Fort Funston and not only are they unafraid of dogs?they need their dogs and they need a place to walk their dogs off leash. Have you ever tried to walk a dog on leash while in a wheelchair?

5. A COMPROMISE? I would argue for all of the above reasons that we should maintain the status quo but I am a reasonable person. Is there a way for Fort Funston to be shared: to offer a place for off-leash use and a place for on-leash only (or no dogs at all)? My walk currently encompasses a grand loop from the parking lot and all the way around to the horse trail and back or all the way down the trail to the north side of the beach and back on the beach. This makes use of the entire span of the trails from the parking lot and north. But okay lets find a compromise?. The current shared use preferred plan has a number of problems:

a. People in wheelchairs have almost no options. Under this plan they are being forced to park their cars and let their dogs run around a small square area. Anyone who has a dog knows that they like to walk with you and are best behaved in this context; besides, the whole idea is to walk with your dog. Someone in a wheelchair has no way of getting over to the north side with their dog. They must sit in the chair and hope the dog will walk itself around the off leash "square" ? a ridiculous concept. This is why the paved western trail must be left open to allow someone in a wheelchair to move around the perimeter. (In fact I would argue that the eastern side should have a paved trail as well to allow a full square to be traversed) I realize that the reason for this part of the plan is to keep dogs away from the cliffs. A

barrier along the western side would help this situation. It need not be a complete physical barrier? just a small fence would create enough of a barrier to keep most of the dogs off the cliffs.

b. There is no loop walk that can be made by owners. The small square perimeter identified as off leash just in front of the parking lot is insufficient. Minimally, there should be a full loop that takes one from the parking lot north to the beach trail, down to the beach, and then south to the access stairs and back up again. Currently the preferred plan requires that you leash your dog on the paved trail and all the way down the beach access trail. Trying to walk your dog on leash down this trail that is steep would be dangerous and lead to accidents and injuries. Most dogs stay on the trail anyway. Making this and the path leading to it on-leash only is unreasonable?

In addition, there are times of the year when the beach is high tide and dangerous for both people and dogs who have drowned. So an alternative must be provided; I would propose that the off leash area loop allow 2 options. One down the beach path and back as described above and the other would allow off leash access from the the parking lot down the paved trail up to the beach access road and back again (including the path back up on the west side (again a small fence to discourage dogs from the cliffs would help). This way someone could have an entire off leash loop. Though I would hate to lose my ability to walk off leash further north and along the horse trail, at least this would be a somewhat reasonable compromise.

I urge you to consider the options above and would be happy to discuss this further.

Yours truly,

Nina

Correspondence ID: 1005 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 13:11:35

Correspondence Type: Web Form

Correspondence: As budgets continue to get cut, and parks continue to close, it is becoming harder and harder to find open places to have meet ups, and let the the dogs socialize, along with the humans, without having to pay RENT. Dogs are a large source of revenue for vendors, grocers and pet supply companies, PLEASE keep some areas open to "pet recreation". It is essential to the dogs and people alike. Thank you, Sue C.

Correspondence 1006 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,06,2011 13:16:13

Correspondence Type: Web Form

Type:

Correspondence: Keeping things the way they are in the GGNRA has my full support. While not a dog owner, I still enjoy seeing the dogs out there having fun. I have a small child, and we have had no problems with the dogs. To simply ban them seems unfair.

Correspondence ID: 1007 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,06,2011 14:09:02

Correspondence Type: Web Form

Type:

Correspondence: The Golden Gate National Recreation Area (GGNRA)'s Draft Dog Management Plan is overly-restrictive, unfair, short-sighted, and a HUGE step backwards. We in the Bay Area are supposed to be leaders in diplomacy and progressive attitudes. Many of us love our companion animals just as persons love their human children. For GGNRA to strip the rights of responsible dog owners and punish canines and the humans who love them by shrinking the exercise and socialization areas down to near nothing is shocking and truly a travesty of justice. Not only is the GGNRA's proposed plan a major departure from the current, balanced use of the park, but it is a slap in the face to those of us who have systematically removed trash from beaches, sand dunes, ice plants, etc., - trash that is there because of HUMANS - not dogs! Many of us who use the canine friendly lands work hard to keep the areas clean and free of debris because we so appreciate them and want them to thrive. It also strikes me as odd that this is the fight the GGNRA wants to take up when there is no research to support the suggestion there has been ecological impact over the past 30 years of the use of the lands for dog walking. What is the true motive here? Ironically, I'm sure the same people endorsing this overly-restrictive plan have no objection to paving the world with roads so they can drive their cars around. This proposed plan is unduly harsh and restrictive. GGNRA - go back to the table and discuss the needs of everyone involved before you make a very, very big mistake.

Correspondence ID: 1008 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,06,2011 14:25:15

Correspondence Type: Web Form

Type:

Correspondence: I'm not a dog owner, but there are so few places for dogs being able to be off leash, and I strongly urge you to leave as many areas open for off-leash use as possible.

Thank you,

Zoe Newman

Correspondence ID: 1009 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 14:28:47

Correspondence Type: Web Form

Correspondence: I am a dog owner, supporter of natural habitats and "birder". I support all efforts to further control dogs. Wildlife should take precedence over pets. There are ENDLESS places that a person can walk their dogs in the Bay Area. There are NOT endless places where wildlife can thrive. I find it disheartening that dogs may win over natural habitats that are shrinking. It was always my impression that Marin County was ahead on preservation....clear that it is also ahead in self-interest.

Correspondence ID: 1010 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 14:41:09

Correspondence Type: Web Form

Correspondence: I already do not support or use National Parks due to restrictive practices regarding dogs. While I support appropriate dog control laws- and enforcement of such, which would prevent many of the problems this document is designed to address- I do not support drastic limitations such as this that prevent a large portion of the citizenry from enjoying our parks and recreation areas. Many of us travel with dogs and therefore have no choice but have them with us when visiting the parks and recreation areas.

The problems- waste not picked up, vicious dogs, etc, are all easily managed by enforcement of existing regulations. There is no need for draconian measures. Dogs create no more environmental impact that people- in many cases much less. Responsibly-handled dogs are much quieter, safer, and more advantageous than allowing teenagers in parks! Dogs do not leave dirty diapers under bushes and broken bottles in parking lots- and neither do the responsible dog owners who are being treated like second class citizens.

I will vote and argue against any funding for public lands as long as restrictions like these exist.

Correspondence ID: 1011 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 14:57:45

Correspondence Type: Web Form

Type:

Correspondence: I urge you not to take away the last remaining lands of off-leash dog area on the Bay beaches. We only have less than 1% of beach lands as it is, for off-leash play. If these lands become more restricted the impact on the quality of life for dogs, dog owners and walkers will be greatly diminished and inland parks will be overcrowded and dangerous. Again, I support keeping the GGNRA off-leash dog areas off-leash dog areas. Thank you.

Correspondence ID: 1012 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 15:04:20

Correspondence Type: Web Form

Correspondence: I STRONGLY OPPOSE GGNRAs preferred alternative 'D' (banning dogs in Rancho Corral de Tierra). The preferred alternative should be 'E'. I hike the trails DAILY here in El Granada and Montara with my dog off-leash. 95+% of users of this property are local, long-time hikers/walkers and their dogs and there are never any dog problems! WE are your daily user/support/volunteer base. After any initial public interest in Rancho subsidies, WE will still be here...and you want to SHUT US OUT??? WHY!!!!!!!!

Correspondence ID: 1013 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 15:15:16

Correspondence Type: Web Form

Correspondence: I walk my dog (on a leash) at Ocean Beach between Noriega and Lawton daily, where we live. This area is supposed to be a leash-only area because of the (precious!) snowy plover habitat. Every single day, without fail, there are unleashed dogs, frequently chasing the plovers -- and I have never seen any sort of ticket or warning issued.

If the laws are not enforced, further restrictions will not help to address the problems and will only punish those that voluntarily comply. I don't think the current policies are a problem, though lack of enforcement is a concrete, solveable problem.

Correspondence ID: 1014 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 15:20:43

Correspondence Type: Web Form

Correspondence: As a San Francisco resident and dog owner for over 50 years I feel strongly that the GGNRA should maintain the current amount of off leash areas. By reducing the off leash areas, it will reduce everyone's ability to enjoy a

public space and the majority of responsible dog owners and walkers should not be punished for the irresponsibility of a select few. If the GGNRA wants to put its officers on the beaches and trails to cite those who are acting inappropriately that would be welcomed. In my experience the majority of dog owners are conscientious and responsible with their dogs in observing and respecting the natural plants, animals and visitors in our parks. It is more commonly observed that other people are damaging the habitat, not dogs. I am not alone in feeling strongly that the status quo should be maintained.

Correspondence ID: 1015 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 15:24:12

Correspondence Type: Web Form

Correspondence: I support the ban on dogs in GGRNA, but I am also concerned about the impact of the law on other parks in the city. I used to love to walk on the beach at Chrissy Field, but have stopped visiting the park because of the large numbers of dogs there. My husband won't go there either, because of the dogs. A few weeks ago I did go there, in the middle of the day on a Wednesday, and counted over 30 dogs on the beach, most of them with dog walkers, many of them out of voice control of the walkers. It was an unpleasant experience to walk on the beach, dodging dogs running and barking. Overall it was an unpleasant experience and I won't be inclined to go back to this treasure of a park, because it is completely overrun by dogs.

On so many occasions I have seen dogs digging unsupervised in the dunes populated with fragile native plants through the work of volunteer workers, and when I ask the dog owners to curb their dog, they ignore me.

Why should dogs and dog owners be given ownership of the natural treasures of the Bay Area -- shouldn't these natural areas belong to the species that LIVE there, and be for the enjoyment of humans after that?

I am concerned that the public parks in the center of SF will become more populated with dogs than before however. I live within walking distance of Duboce Park and Alamo Square park, where the dog owners often flaunt the leash rules for the areas of the parks where dogs should be leashed, creating unpleasant experiences for me and my husband. My husband likes to run in Alamo Square park, and was bitten by a dog last year, whose owner was unconcerned that my husband had blood dripping down his leg because of the dog. Dogs are predators and should be controlled!

New York City has a great model for dog owners and parks. Mostly parks are for the enjoyment of people and children can play safely, because dogs are given fenced-in dog runs in a smaller area of the park. In SF, the dogs

have free run of the larger part of many of the parks. This ruins the parks for anyone who does not own a dog.

Thank you so much for the opportunity to make a comment on this important issue.

Correspondence ID: 1016 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 15:45:17

Correspondence Type: Web Form

Correspondence: I am vehemently against the proposed restrictions proposed in the draft dog management plan. Ft Funston used to be occupied mainly by drug dealers and derelicts and today it is a vibrant area that many dogs and dog owners enjoy. The trails in the Presidio and Lands end are also safer because of the increased visitation due to dog owners that want their dogs to get exercise. If the leash laws are implemented, most of these dog owners will just go to their neighborhood parks which will increase traffic in those small parks that are not equipped to handle more people and dogs, Currently, small neighborhood parks are generally used by families with small children and the larger parks are used by pet owners. That balance will be greatly disrupted if the leash laws are imposed. San Francisco has a tradition of being a great place to live and where the quality of life is very high. These proposed restrictions threaten to change that- we are not a city like Manhattan where people can never enjoy their pets off leash. We are blessed with so much open park space in and near our city- that is why many of us choose to live here. Please do not take away our freedom, as the benefit gained by leash laws is far outweighed by the harm and burden it will place on pets and pet owners in this city. According to the American Pet Products Manufacturers Association (APPMA) 2001-2002 National Pet Owners Survey:

There are approximately 68 million owned dogs in the United States. Four in ten (or 40 million) U.S. households own at least one dog. (63% of households).

For San Francisco, that is about 60,000 people that will be burdened and unfairly harmed by these proposed regulations!

Correspondence ID: 1017 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 15:46:43

Correspondence Type: Web Form

Correspondence: I am very distressed by the proposed GGNRA "preferred option" to ban dogs on Muir Beach. We live in Muir Beach and are responsible dog

owners. Our dogs are always greeted and fussed over by strangers on the beach. The dogs on Muir Beach help to make the beach a friendly, joyful experience for everyone. They create a feeling of neighborhood and community and are an indelible part of the experience of the beach.

There are many options for dog free beaches in Marin. There is only one dog friendly beach. There are other ways to protect sensitive habitat than to ban dogs altogether. The proposal to allow dogs on Little Beach but keep them off the main beach is not a feasible alternative. One of our dogs is fourteen years old. For several years he has not been able to scramble across the rocks to Little Beach. There is an occasional low tide that allows him to cross on the sand, but those times are few and far between. There is no parking anywhere near Little Beach. As a resident living on Sunset Way, the access road to Little Beach, I can assure you that vehicular access and parking for access to Little Beach would cause a significant problem for the residents.

I strongly urge you to continue to use education rather than segregation. I am a birdwatcher and a naturalist and appreciate the work that has been done on the lagoon. I love to see the otters and look forward to a time when the salmon are breeding. I do not feel that banning dogs from the intire beach is necessary or warented. Post more signs regarding the restoration of Redwood Creek and its sensitive habitat clearly stating the rules. There are usually more children than dogs playing in Redwood Creek. I support Map 5A which continues off leash beach access for dogs and Map 7A which keeps the Coastal Fire Rd and the Trail at Muir Beach open for dogs.

I find dog owners at Muir Beach to be very responsible. We always carry poop bags and rarely see dog poop that has not been taken care of...but on the rare occasion, I do collect any dog poop that I see. A receptacle at the beach would be helpful.

The cost to patrol the beach would be far more than signage and education. Do not put an end to this long tradition of playfulness and freedom in a community that prides itself on being inclusive and responsible.

Sincerely,

Sarah Brightwood

Correspondence ID: 1018 **Project:** 11759 **Document:** 38106
Received: Mar,06,2011 16:09:22
Correspondence Type: Web Form
Correspondence: Please make the GGNRA dog free. Do not cave in to the vocal minority.

Dogs in a National Park is a bad idea which is contradictory to the long term health and welfare of the native plants and animals which have been marginalized by urbanization.

Show some environmental backbone in the spirit of the NPS's founding principles and stand up to the well intentioned but short sighted, entitled and egocentric enthusiasts.

True land stewardship does not allow adverse impacts from domesticated animals on the land which will alter it's natural state; thereby depriving future generations the ability to experience the undisturbed or restored land we have remaining, as we the current generation does now.

Correspondence ID: 1019 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 16:13:07

Correspondence Type: Web Form

Correspondence: I am very concerned about the upcoming vote to take place on April 14 concerning on/off leash dog areas in GGNRA. I am an avid walker and take my dog to many of the areas that are under consideration. I love living in SF partly because of how friendly and open the spaces are. I watch regularly how dog owners pick up litter as well as their dogs feces. We have happy dogs and people living here and I think that is really special. To take the off leash option away would change a lovely, unique culture that is not harming anyone. Dogs off lead are better behaved, dogs that are exercised are better behaved and dogs socialized are better behaved, and not in a closed in area, but where they can run and play without being confined.

I believe we are a respectful, thoughtful and caring group of dog owners in SF and what a shame it would be to not fully enjoy the areas we and our dogs have come to consider part of our daily lives.

Correspondence ID: 1020 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 17:30:18

Correspondence Type: Web Form

Correspondence: Re: Chrissy Field, Central Beach I am very unhappy at the ROMA proposed for Central Beach - it is one of the best places in the city to walk in nature, and is already marred by the large numbers of dogs and dogwalkers there, over 30 dogs last time I was there. There would be even more dogs there under the proposed plan. The dogs should be ON lease in this area! I love and cherish this beach, walking on it is one of my favorite things to do in SF, but the peaceful nature of the place is destroyed by large numbers of dogs. In addition, the dogs tend to destroy the dunes there when they are not

under adequate voice control by their owners. I have repeatedly asked dog owners to control their dogs who were digging in the dunes (populated by rare native species of plants), and was ignored by the dog owners. Please preserve this jewel of San Francisco! Thank you for the opportunity to comment on this important issue.

Correspondence ID: 1021 **Project:** 11759 **Document:** 38106
Received: Mar,06,2011 17:45:54
Correspondence Type: Web Form
Correspondence: Please keep dogs off-leash status for responsible dog owners at our favorite spots: Rodeo Beach, Muir Beach, Crissy Field

Correspondence ID: 1022 **Project:** 11759 **Document:** 38106
Received: Mar,06,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I have been on a pilgrimage to see many National Parks and recently saw Yellowstone, Bryce, Zion and Arches, but realize that I have the best park back at home with Fort Funston. I like to join the crew on the first Saturday of the month to help collect trash and keep Funston clean. I discovered Funston because I walk my dogs there.

Correspondence ID: 1023 **Project:** 11759 **Document:** 38106
Received: Mar,06,2011 18:41:51
Correspondence Type: Web Form
Correspondence: To the Federal Bureaucrats who Want to Take away our Dog Parks:

Paws off! This isn't Iran or Libya where government hypocrites do whatever they want in complete disregard for the very people who pay their salaries. The people have spoken, are speaking, and will continue to speak: we love dogs and we love our off precious few leash dog spaces. We expect more, not less off leash space and now that you have galvanized us on this issue you will see more passion, not less, for off leash dog spaces in the future.

If you don't believe me, go to Crissy Beach just about any day of the year and you will see lots of dogs off leash. It's what people here want. We love dogs. We have more dogs than children (although we love children too, they're just very expensive if you live in San Francisco). If you can't handle that, go back to Washington DC before our local ELECTED representatives take control of the Presidio away from you.

Russ Cohn San Francisco resident

Correspondence ID: 1024 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 18:55:03

Correspondence Type: Web Form

Correspondence: Let me say that I am insulted as a scientist. You have insinuated that research indicates that dogs are bad for birds or the environment or something vague like that, without providing any scientific evidence. Liars. Shame on you. There is no scientific evidence that dogs are bad for the birds or the environment or anything else like that. That sounds just like George Bush using science for political means - and he's not a very popular guy in this country right now. There are many well educated technical and scientific and legal people here in the Bay Area so you're not going to pull an intellectual fast one on us like you have pulled on the American people at large. Not surprising from our federal government who lies to us often (weapons of mass destruction in Iraq, really? Show me evidence). I challenge the federal bureaucrats to come up with a shred of scientific evidence that shows that dogs are in any way bad for the environment. If you look into it, you will find that it is an undisputed scientific fact that dogs do not harm the environment in any way (see what I just did there? So easy). But seriously, cats are the ones attacking birds. Just ask any animal shelter or SPCA or animal care and control office. Ask them how many birds come in each day injured with dog paws or dog bites. And of course, the number one threat to birds and the environment in general are HUMANS. Don't blame the dogs. If you really care about endangered birds, start by banning the Blue Angels. What bird is going to want to stick around with dozens of mega ton eardrum piercing killers flying over every year? Then go after the construction down there - pounding on Doyle Drive day an night for a few years sound like a nice cozy environment for birds?

Correspondence ID: 1025 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 18:59:03

Correspondence Type: Web Form

Correspondence: Dear GGNRA,

Please do not restrict designated off-leash dogs areas in San Francisco! Your proposal not only hurts our reputation as a city, but the health and sanity of our residents and tourists, both human and canine. The very idea is ludicrous!!

Instead of your trumped up "litigation" costs, why not use those funds to promote the health and happiness for all who enjoy GGNRA parks with

their companions. Isn't that the purpose of recreational parks? Perhaps you could redirect all your negative energy toward enforcing the obvious: those who do not have control of their dogs and/or do not "pick up" should be cited, fined, and banished. The rest of us (mostly taxpayers) would like to enjoy a little exercise and a nice walk with our well-behaved friends.

Correspondence ID: 1026 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 19:49:58

Correspondence Type: Web Form

Correspondence: As a member of the GGNP Conservancy, I encourage the GGNRA to incorporate the recommendations of the Golden Gate Audubon Society in the Dog Plan that it is developing.

Specifically:

1.) All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs. 2.) There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for commercial/professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time. 3.) Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules. 4.) The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

5.) The Park Service should keep in mind that while dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals that rely on the park to survive. It is fair to ask dog owners to accept certain limits for areas where their dogs may play when the survival and wellbeing of so many wildlife animals and plants is at stake.

It's very important that the off-leash dog situation improve for the protection for the wildlife in the GGNRA. We can't let the situation as observed at the Crissy Field Wildlife Protection Area persist where often as many as two thirds of the dogs there are off leash and threatening the area's natural inhabitants.

Respectfully, Tim Montgomery

Correspondence ID: 1027 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 21:51:32

Correspondence Type: Web Form

Correspondence: My family and I walk our dog Mazzy (black and tan coon hound) under voice command on a daily basis .We clean up heer poop,keep her on the trail,and insist she respects other people and their pets.We do not want to give up this natural way to excersize our dog.She is spirited and truly enjoys her walks off leash.We got her from a rescue center, a shy and fragile female who was found hungry and abandoned in a field near Modesto.We believe her walks off leash have brought her back to her natural self reliant ways. She does not do well in a dog park with the frantic stick and ball tyoe dogs,frankly they intimidate her and make her feel uneasey, she prefers the open space of our Marin Headlands trails. Please leave the trails open for off leash use. This is our dogs fondess times and we will surly miss this oppertunity to share the natural surroundings with her if we are forced off these trails with these new rules. I recommend the rules for dogs at Oakwood Valley REMAIN as they are now. Thank You Carmack McCormick

Correspondence ID: 1028 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 22:09:04

Correspondence Type: Web Form

Correspondence: I find it a shame that people keep trying to limit the areas where dogs are allowed to run off leash. I truly find it ridiculous. I come from a country where dogs are allowed in restaurants. So hearing about trying to keep dogs on leash on beaches or off of beaches is simply cruelty to me. Where are dogs supposed to get their exercise??? Should we keep them locked up in the apartment all day and drive our fellow neighbors insane, because our dogs can't get enough exercise anymore? Why is this such an anti-dog country? Dogs do not get enough exercise just walking on a leash-they need to be able to run and stretch their legs. I find this new attempt of limiting dogs' ability to exercise very disturbing, cruel, and anti-dog.

Correspondence ID: 1029 **Project:** 11759 **Document:** 38106

Received: Mar,06,2011 22:14:44

Correspondence Type: Web Form

Correspondence: Dear National Park Service:

First, I commend the NPS for taking on this important issue. For far too

long, dog owners have been allowed to let their dogs roam off leash without consequence. As a frequent user of many of areas analyzed in the Draft Plan, particularly the Lands End, Ocean Beach, and Crissy Fields areas, I have often been harassed or annoyed by off leash dogs.

For instance, I have been growled at and barked at by off leash dogs. It is a very frightening experience to be confronted by an aggressive dog that is seemingly not under its owner's control.

I have also witnessed off leash dogs harassing wildlife, frightening young children, and barking at and chasing bicyclists. Off leash dogs can also interfere with guide dogs relied on by disabled persons.

Current regulations regarding off leash dogs are insufficient to protect the public and sensitive species that reside in the Golden Gate National Recreation Area. The current state of off leash dogs at GGNRA has hampered my enjoyment of these areas on numerous occasions. Dogs should be required to be on a leash and under the control of their owner's at all times, with the exception of limited and fenced off specific areas.

As such, I encourage the National Park Service to adopt Alternative D in order to afford the maximum protection to the general public and wildlife, while only saddling dog owners with a minimal and completely reasonable responsibility (keeping their dogs on a leash).

Thank you very much for considering this issue.

Sincerely,

Shanna Foley

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| Correspondence ID: | 1030 | Project: 11759 | Document: 38106 |
| Received: | Mar,06,2011 22:42:32 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Leashes should be required EVERYWHERE. Anyone who wants their dog to run free needs to buy a home with a large backyard. It is not the City's responsibility to provide anything more than leash-required public space. Thank you for all efforts in this direction. | | |

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|-----------------------------|----------------------|-----------------------|------------------------|
| Correspondence ID: | 1031 | Project: 11759 | Document: 38106 |
| Received: | Mar,06,2011 23:47:36 | | |
| Correspondence Type: | Web Form | | |

Correspondence: NPS:

The Golden Gate National Recreation Area is not a pristine wilderness that must be protected from the intrusion of civilization.

Your dog management plan does not serve the needs of San Franciscans seeking to enjoy outdoor recreation with their children and pets. These areas are urban parks, not remote wildlife sanctuaries that must be protected from families and their pets.

San Franciscans from all walks of life have successfully shared these urban parks with each other and their dogs, horses, bicycles and children for decades. It is unfair to take away these privileges now after so many have come to rely on them and incorporate this access into their way of life.

I do hope you will reconsider your plan.

I am a nature lover, dog owner, taxpayer, and registered voter.

Sincerely,

Victor Bartolotta

Correspondence ID: 1032 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 01:14:58

Correspondence Type: Web Form

Correspondence: I have been living in the East Bay since 1993. The reason I live here is because I can enjoy the privileges of urban living, and still have access to undeveloped areas where I can walk with my dogs. For a living I provide alternative medicine to people and animals. I see many dogs with anxiety disorders and skin conditions that have developed simply because the dogs are not able to release the stress of urban living by being dogs. Being a dog means being able to run and sniff and explore. A loving guardian, good food, and time to romp are the top three things that make a dog healthy.

I am also a conservationist and have managed nature centers in the bay area and run watershed awareness programs for Alameda County. If I thought dogs were seriously endangering wildlife, I wouldn't advocate for their off-leash privileges. The Bay Area is full of people who have trained their dogs to have good recall, to come when they are called, so that these people and dogs can enjoy the outdoors together. If I'm walking with my dogs at the Albany Bulb and I see shore birds, I leash them. If we're Point Richmond and there are wild geese, I leash them. When we're in Redwood and I see a horse approaching, I leash them. If we're in Roberts and a mountain biker is

coming down the trail, I call them and have them sit while I give them treats until the bikes pass. The majority of people who take the time to travel to these areas with their dogs are equally responsible in their stewardship of their dogs.

Lastly, for three years I ran a dog-walking business. During that time, I walked dogs off-leash in the East Bay Regional Park with my dog walking permit. During that time, I never saw one of the dogs in my group hurt a wild animal or destroy habitat.

The Bay Area is unique in the great gift we have in the Regional Parks and National Recreation Areas. Part of this great gift is the immense pleasure of being able to hike with one's dog in the off-leash areas of these parks. If you reduce the off-leash access in these parks, you will be greatly reducing the gift that the bay area gives her residents.

Correspondence ID: 1033 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 02:22:48
Correspondence Type: Web Form
Correspondence: Hi,

I am wrting in regards to the possible restriction of dogs being off leash and the designated area of dog run at Fort Funston. I think this is the biggest mistake GGNRA is making and breaking agreement which was put in place over 30Years Ago.

The new plan to restrict dogs to a dog run is going to cause Major dog Fights in a small enclosed area. Dogs need to have room to run and blow off their energy. I know 90 people that walk their dogs at Fort Funston are responsible dog owners, and keep Fort Funston beautiful and clean!!.

I also think it is unfair to Dog Walkers which would take away their lively hood, because they won't be able to adequately exercise clients dogs. GREAT you will Make more Americans unemployed.....

RE Think this GGNRA you are making a BIG MISTAKE!!..The people and dogs that use this land RESPECT IT.....

Thank YOU,

KatieChance's MOM :)

Correspondence ID: 1034 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 10:03:42

Correspondence Type: Web Form

Correspondence: I am writing to ask that you keep and increase all dog off leash areas and trails in regional parks in Alameda and all other county's in CA. Dogs need places where they can run in order to stay healthy and happy, and their owners need a respite from the constrictions and stress of walking dogs constantly on leash.

It seems to me that a humane and conscious government makes and keeps laws that allow not only people but animals the chance to exercise in safe and healthy environments.

I implore you to please keep the off leash areas we already have and increase them in all regional parks and trails.

Correspondence ID: 1035 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 10:07:46

Correspondence Type: Web Form

Correspondence: This plan is misguided and should be thrown out. There is so much space available the parks are one of the few places that dogs can run around in the Bay Area. These parks should serve the public, and this new plan does the opposite. The only thing this accomplishes is angering thousands of people - it doesn't make anybody happier or add to the greater good. Stop wasting taxpayer money on frivolous campaigns like this one.

Correspondence ID: 1036 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 10:09:02

Correspondence Type: Web Form

Correspondence: Please DO restrict the areas where dogs are allowed in the Golden Gate National Recreation Area. But then you have to enforce it. Right now, regardless of the regulations, it seems like no place on Ocean Beach is safe from loose running packs of dogs.

I live in the outer Sunset. It's not bad enough that when I'm heading down to the beach (or on my way to cafes or grocery shopping) the sidewalks are strewn with feces. But once I'm at the beach, it's no longer possible to relax and walk along the water's edge, watching the waves. Now a person has to keep an eye out for wet running dogs that come rushing up out of nowhere. It only takes the occasional badly trained dog that jumps on me or leaves a trail of slobber on my clothes to make me tense up every time I see one running toward me. Needless to say, a walk on the beach is not as pleasant

as it used to be.

I used to love walking on the bluffs at Ft. Funston. They offer a particular elevated view of the beach that can't be had anywhere else. But I've had to completely give that up - it's a nightmare these days. It feels (and smells) like a giant dog run. Ocean Beach is heading in that direction, too.

Correspondence ID: 1037 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 10:14:43

Correspondence Type: Web Form

Correspondence: I use Crissy Field Beach 3-5 times a week for walking, birdwatching, and swimming. I love dogs, but off-leash dogs do not belong in a National Park. I frequently see off-leash and out of control dogs in supposedly protected areas. There is no reason that this should be happening.

Not only should this proposal be adopted, it should be strengthened to higher compliance goals. The mission of National Parks is to protect the natural resources. Birds and the last wild areas in San Francisco should not be sacrificed - especially given that most of the dogs at Crissy Field are being taken there by a commercial dog-walking service. It is not incumbent upon the National Parks to sacrifice endangered or threatened birds for private profit.

Correspondence ID: 1038 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 10:23:23

Correspondence Type: Web Form

Correspondence: I support the proposal to limit the areas where dogs are allowed off-leash. Too many dog owners abuse the rights and adversely affect the enjoyment of other GGNRA users. As it is, there are many dog owners that refuse to deal with the waste that their animal deposits. Letting dogs run loose all over the place leads to a much greater amount of uncontrolled dog waste and other behavioral issues. If this plan is implemented, please ENFORCE it.

Correspondence ID: 1039 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 10:44:51

Correspondence Type: Web Form

Correspondence: The plan doesn't go far enough. Dog walkers, particularly professional ones are making our national park areas in the GGNRA smelly and filthy from all of the feces and urine from the dogs. This is particularly true at Crissy field and Fort Funston. These parks have been essentially taken over by free

roving dogs. I've often seen young children being run over by dogs at Crissy Field and am sure that there have been numerous incidents and near misses between dogs and children there.

Even if the NPS does ban free-roving dogs from these sites there will be no enforcement so the dogs will continue to run wild at these sites.

Correspondence ID: 1040 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 11:11:31
Correspondence Type: Web Form
Correspondence: Uncontrolled dog/s are a detriment to the public. Dog owners may, or may not, be able to control their dog/s when off-leash. The dog/s may, or may not, be dangerous. The public should not be afraid while in a public park. Dogs are not members of the public, no matter what dog owners may think. Public parks are for the public, ALL of the public, and should not sacrifice the safety of part of that public for the convenience of a minority.

Correspondence ID: 1041 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 11:25:52
Correspondence Type: Web Form
Correspondence: I like the new management plan as is. I think it is equitable to all.

Correspondence ID: 1042 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 11:32:03
Correspondence Type: Web Form
Correspondence: As a dog owner I take my dog to Crissy Beach almost every day. It's one of the nicest places in the Bay Area where dogs can roam freely. The proposed plan is a radical departure from the current policies and will severely restrict the amount of off leash areas in the Bay Area, not just at Crissy Field / Beach but elsewhere too. I see no need to change the current policy. If people behave irresponsibly they should be cited, but do not let the vast majority of dog owners be punished by a few incidents. San Francisco has the reputation of being a dog friendly place, let's keep it that way.

Correspondence ID: 1043 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 12:03:21
Correspondence Type: Web Form
Correspondence: Please consider the dog-owning community as responsible adults and post signs where dogs - and people - should be kept out of sensitive areas. Allow trails and Muir Beach to be available to responsible dog owners under

current rules. For example, when visiting Muir Beach, I see children run amok in sensitive areas as dogs play in the surf or lounge with their families. Where is the signage to protect recently restored riparian areas and the mouth of the salmon stream? It is not being threatened by responsible dog owners, but by irresponsible or uneducated people.

My comment is against these new rules, tho I favor education and signage to protect wildlife and sensitive areas.

Thank you.

Correspondence ID: 1044 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 12:20:49

Correspondence Type: Web Form

Correspondence: It would make it easier if you had a simple summary that the public could read. And a simple way to email you instead of this form. The process you have favors the dog coalition in the City that is organized, and not individuals like myself.

I'm for more restrictions on dogs in the Golden Gate National Recreation Area. I'm a 63 year old San Francisco resident. I used to frequently visit Crissy Field but haven't been there in a long time. A few weeks ago I did make a new attempt but as I drove up saw two dog-walkers with 5-10 dogs each, and thought to myself this is not a place to enjoy a walk.

There are just too many dogs. A person with several dogs cannot keep them under voice control.

Too many people let their dogs run loose along the main walk ways. They may think their dogs are nice and well-controlled but not all people think that.

Not everyone likes dogs. Some people have had very bad experiences with dogs attacking them, biting them, even mauling them.

I think we have a group of people here ("I Have A Dog and I Vote") who believe the Constitution has a clause in there protecting rights for their dogs but that isn't so. The parks should be enjoyable for all people.

Thank you.

Correspondence ID: 1045 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 12:26:20

Correspondence Type: Web Form
Correspondence: Chrissy Field

It is a Sunday Morning around 8:30. I and my dog Finn load up in the car to head in to his favorite place, Chrissy Field in San Francisco from across the bay in Berkley. Finn is a 4 year old Golden Retriever who has a love for Swimming. We get off the Bay Bridge and head down the Embarcadero as we turn onto Marina Blvd. Finn, sitting in the back starts getting excited. He knows where he is going now. Finn starts by staring out the front windows and then he start whimpering a little. Culm down Finn. I say. "We are almost there." We park at the West end of the main parking lot at the beach. I hook him up to the leash and let him out. Before he can be let free to swim I have him sit and stay until I give him the command "OK". Immediately he heads for the water. Before I can even throw his favorite toy he jumps right in and swims around on his own. Then he rolls arounds on the beach in the sand. I can see the smile on Finns face. Does a dog smile,, there is no doubt in my mind. A dog, mans best friend. As I walk down the beach towards Fort Pt. and the Warming Hut I Take a deep breath taking in the salt air from the sea. And take in the Breathtaking view of the Golden Gate Bridge which helps to wash away the stresses from the previous week. This is the Bay Area a place I love and a place I call "Home". Even on a rare hot summers day I rarely see many beach goers using the west end of the beach. There are very few places in the Bay Area and in California where one can take their dog off leash and walk along the beach. Finn's first love is Swimming and I would hate to see this taken away.

Correspondence ID: 1046 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 12:34:01

Correspondence Type: Web Form

Correspondence: It's about time that Golden Gate complies with NPS policy!! Dogs should have always been allowed ON LEASH ONLY in certain areas. See what problems have been created by caving in to the whiny constituency? Good luck GGNRA!

Correspondence ID: 1047 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 12:51:31

Correspondence Type: Web Form

Correspondence: Hello -

Dogs are our best friends and contribute to a healthy civic atmosphere.

However, they need to run and be free or else they get cranky and bored.

By running a dog is expressing its true nature which is a joy and inspiration to behold. Suppressing off leash walking is like putting a ban on music in public spaces.

e

Correspondence ID: 1048 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 13:24:24

Correspondence Type: Web Form

Correspondence: I'm disappointed to see the proposal to eliminate dogs on most of Muir Beach, my wife & I take our dog there regularly. In the times I've been there I've seen humans doing more damage than dogs, especially the ones that trample through the brush & break off branches to use in fires on the beach.

The Preferred Alternative document, in the section on Muir Beach, says "Off-leash dog walking can occur at a small beach area on county property adjacent to the NPS beach," however, that area does not seem to be identified on Map 5 Muir Beach. Looking at that map, I have to assume it's the southern-most end of the beach, the area outside of the green boundary line. If that is the area, how is it to be accessible? The only allowable way out of the parking lot (with a dog) as shown on the map is the Pacific Way Trail, which is "to be built." The map doesn't show the path a dog-walker would have to take via the Pacific Way Trail to reach the south end of the beach, but it appears it could be several miles, which is hardly a practical option, especially for the elderly or handicapped. So what is the proposed access method for this beach area with a dog? Boat? Helicopter?

I've looked at Maps 26 27 Adjacent Dog Use Areas but I don't see the adjacent county property identified on those maps either. Please let me know if I have missed something. I look forward to clarification on this.

Thank you.

Correspondence ID: 1049 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 13:50:09

Correspondence Type: Web Form

Correspondence: I have lived in the Parkside are since 1973. During my early years here I walked the Fort Funston area with my wife once a week. After many somewhat threatening encounters with aggressive-looking dogs, that were never on leash, and where I did not trust voice control by the dogs' owner,

we decided to discontinue our walks there. Recently I walked through the Fort Funston area and noticed that the landscape looked desolate-pure, bare, chewed-up hills of sand, and although I was not intimidated by any dogs, my memories are such that as a walker, I will not go there any more, unless I am passing through on the coast side.

Every week, for some years now, I walk Crissy Field from the Golden Gate Bridge vista point to Fisherman's Wharf via Fort Mason. I encounter numerous dogs each time, but have not had any bad encounters. As I sit often at the Haas Overlook to the Golden Gate Bridge, I notice the numerous dogs freely running on the beach, and wonder how any mother can let their child play in the beach sand.

I do not understand the oft militant stance of many dog owners-that their dogs must run free to properly exercise, and that they are not prepared to compromise at a park that is visited by numerous tourists and walkers/joggers like me, who have no dog, and want to just enjoy the beauty and serenity of the park.

Sincerely,

Carl T. San Francisco

Correspondence ID: 1050 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 14:03:48
Correspondence Type: Web Form
Correspondence: This is ridiculous! California, especially the Bay Area has a high number of dog owners(1 in 4 households currently have a dog). Greatly restricting where we can take our pets would do the entire area a great disservice!! Please do not go forward with these plans.

Correspondence ID: 1051 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 14:13:34
Correspondence Type: Web Form
Correspondence: I don't get why this has to be done. I take my dog to Crissy Field and he plays with other dogs this is the only place he can be off leash. There are hardly any places in the city where they can be off leash. How are they suppose to go get some exercise? What am i suppose to just keep in locked in side..? What about swimming is that closed off to him too. This is not a bad area we take pick up after our dogs the beach is clean. I don't think it's fair, write a ticket to people that cant control there dogs off leash.. This is so ridiculous and unfair to all dog owners, what about dog walkers. This is just

not fair to all of us. So please tell me where are the dogs suppose to go are you going to make new parks for us thats only for dogs, I doubt a lot of people will still keep there dogs on leash. So YES my dog will still swim in the bay because ocean beach is unsafe with the current. If your dog is mean to other dogs do not take them to the parks where u know other dogs will be!!!

Correspondence ID: 1052 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 15:21:46

Correspondence Type: Web Form

Type:

Correspondence: 1. All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.

Dog owners often assume that everyone has the same comfort with dogs as they do. This is far from true and many people feel threatened by off-leash dogs and have legitimate fear of our sometimes unpredictable canine friends. This can quickly escalate if a dog senses fear in someone and things spiral out of control.

So while dog owners might think this is over caution, it is a fact that people DO suffer mauling and injury from off-leash dogs.

2. There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time.

Professional pet service activities should be done in places with guidelines in place for this kind of work. A public park should be a safe space for people first, not one dominated by professional service activities.

3. Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules.

4. The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

5. Remind the Park Service that while dogs are important parts of our families and communities, they are just one animal that is having a

significant negative impact on thousands of other animals that rely on the park to survive. It is fair to ask dog owners to accept certain limits for areas where their dogs may play when the survival and well being of so many wildlife animals and plants is at stake.

Correspondence ID: 1053 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 16:28:36

Correspondence Type: Web Form

Correspondence: Dear Parks,

I am a ten-year-old boy who has practically grown up in the Golden Gate National Parks. I was born just a few blocks from the Presidio, I go to school just outside of the Presidio, and my mom takes me to the parks all the time. My favorite places are Crissy Field, Lands End, and Rodeo Beach. I volunteer at Lands End, go to the Crissy Field Center summer camp, and regularly see movies at the Disney Museum.

I have been raised with dogs, and I love dogs. I think the dog plan that the National Park Service has proposed is very reasonable, because I don't think that dogs should have exclusive rights in the parks. Really, I don't think that dog WALKERS AND OWNERS should have exclusive rights in the parks. Why should they have priority over kids and babies and snowy plovers and lizardtail and monkeyflower? We all have to live together and in harmony, and the dog owners should not be the boss of everyone else.

I really love the parks, and I want them and their plants and animals and habitats to be around for everyone to enjoy.

Correspondence ID: 1054 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 16:55:45

Correspondence Type: Web Form

Correspondence: 2ND SUBMISSION - ENCOUNTERED PROBLEM

Let me first say that I think Crissy Field is the Crown Jewel of San Francisco and that you have done a fabulous job with it's design and management. With that said, let me point out that you probably don't get a lot of praise; you are most likely apt to hear from people who are unhappy and have something to complain about. Which is a real shame, but unfortunately, the way of the world.

I think Crissy Field could be described as about the most perfect, multi-use park in the United States. The fact that it accommodates beach goers, hang

gliders, picnickers, joggers, dogs, walkers, bikers and everything else is wonderful. I truly believe that absolutely nothing needs to be changed at Crissy Field. As I said above, it is a true gem!

I don't own a dog and so it is a treat for me to go to Crissy and frolic with the many dogs that are allowed to run off-leash on the beach. This is how I get my "Fur Fix." Never have I come across an aggressive dog that if off-leash. Friends of mine from Novato and Oakland, who have dogs, frequently drive to Crissy just because it is such a special place for both humans and dogs. Other friends from Napa always make Crissy Field a stop on their way home after retrieving out-of-town guests at the SF Airport.

On my many trips to Crissy I rarely see dog poop on the beach? most dog owners are very vigilant about picking it up. The last three times I visited, I took extra bags just to generally pick up trash that had floated in off The Bay and while scanning the beach I did not see any dog poop. There will always be bad owners and it is unfair to paint the majority with the same brush.

Being rather outgoing, while at Crissy I'll strike up conversations with anyone who is willing. I've spoken with people from all over Europe, the United States and people who live in the neighborhood. I have heard nothing but glowing comments about what a special place Crissy is and then people go on to comment that they wish their dogs were traveling with them. Not too long ago I met a family that was traveling in an RV and they were thrilled that there was this beautiful beach that their kids and dogs could run on. The dogs had not had a good run for days. I've also spoken with people from the immediate neighborhood who walk there frequently. A lot of the elderly people will approach people with dogs just to pet the dogs. Then they will chat about how they use to have this or that dog but the dog had grown old and passed on. This is a wonderful change for the elderly to get out, get a little exercise, get their "fur fix" and chat if they are lonely. As I said above? a true gem!

I've only written about Crissy Field here because I love the place and think it is perfect as is. My wish would be that you take what you have done at Crissy and implement those things at many more places.

Please don't listen to just the complainers. There is plenty of space for wildlife, humans and dogs to share. If we don't tell you often enough what a great job you are doing? just ask.. you will get nothing but praise from me.

Correspondence ID: 1055 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 17:10:15
Correspondence Type: Web Form
Correspondence: Please do not ban dogs from the beaches of San Francisco.

Thank you.

-Colin

Correspondence ID: 1056 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 17:44:56
Correspondence Type: Web Form
Correspondence: I have walked one dog or another on Ocean Beach almost daily for the past 25 years. There are dog-owners who neither supervise nor clean up after their dogs, but the vast majority of local dog walkers are responsible and do not allow the dogs to harass the shorebirds. I have read a Bay Bird Survey that indicates the real problem with the Western Snowy Plover is that the California Gull is eating their eggs in the nesting areas. This seems consistent with what I have observed on Ocean Beach where the smaller birds are harassed more by gulls and ravens than dogs and people. I think the shorebirds are also more disturbed by the Park Police vehicles on the beach than pedestrians with leashed dogs. I believe the GGNRA is acting more out of fiscal preference than really trying to balance the needs of the shorebirds and the residents. It's just easier to ban dogs altogether than to work directly to fine and remove the minority of beach users who are irresponsible. Why doesn't the GGNRA show us some scientific basis for this proposed regulation? Probably because none exists.

Correspondence ID: 1057 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 17:47:07
Correspondence Type: Web Form
Correspondence: I have two dogs that I walk at Fort Funston about twice a week. Each time I have gone over the past several months, the hang gliding area has gotten larger and larger. I get it. They need more room for safety and the variations in wind and so forth. At times, I see one or two men with little motorized planes in the area south of the hang glider landing area. The vast majority of people who frequent the Fort are individuals who walk their dogs for pleasure. Commercial dog walkers are present as well and I personally think that more than six dogs at one time is risky. I have rarely seen any incident of fighting or disputes between owners or their dogs. I am aware of an incident that took place when a crazy person attacked a dog with a knife but there are crazy people in every neighborhood in town. You cannot regulate that.

What I cannot understand is why anyone else would use Fort Funston unless they just wanted to walk on the beach. Why such severe restrictions on the

ROLA size is what puzzles me. It also seems that having a dog on the beach is just about eliminated in your preferred plan.

I do like the idea of having commercial dog walkers get permits. I realize this is a difficult task but the plan is too restrictive for my needs.

Correspondence ID: 1058 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 17:52:40

Correspondence Type: Web Form

Correspondence: I am completely opposed to the plan to ban dogs from some of the GGNRA sites and require leashes on others. I am for ticketing irresponsible dog owners who do not pick up their litter or who allow their dogs to chase birds or animals in the parks.

Dogs are the reason many of us get out and hike as much as we do. Some dogs need more exercise than we can provide them while they are on a leash. Well trained dogs and responsible dog owners should not be punished for those that are not. Responsible dog owners are often the ones picking up the litter, restoring habitat, and caring for these special places.

I hike the GGNRA Pacifica parks, including Mori Point, Sweeney Ridge, Milarga Ridge and areas destined for GGNRA, Pedro Point Headlands, and Cattle Hill at least 4-7 times a week. I organize beach cleanups, litter cleanups throughout Pacifica, and habitat restoration events too. The dog people are some of our best volunteers in keeping Pacifica beautiful because they do go on daily walks. Keeping them off of the beach or our parks is a disservice if you ask me.

Please change the proposed plan to include dogs - offleash and in control at all park locations. Our parks need them and their responsible owners. As for any irresponsible, fine them, fine them big time!

Correspondence ID: 1059 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 19:01:43

Correspondence Type: Web Form

Correspondence: I have had dogs all my life and know the importance of giving them the time they need off-leash to get all their energy out. I also have had experiences with dogs that have owners that cannot control them.

My suggestion is to make areas on-leash unless visitors have acquired an official permission ID card from the rangers. I think the park could make quite a bit of money from having headquarters with dog behavior specialists

that monitor a dog's behavior before giving it a year-long pass. Passes could cost \$5 or so each. Dedicated and local dog owners would have the freedom to use the parks at little cost annually, with out being harrassed by unruly dogs and underskilled owners. The GGNRA could use the money to balance their costs for the program and for bettering the parks.

Correspondence ID: 1060 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 19:08:07
Correspondence Type: Web Form
Correspondence: 1. No off-leash dogs should be allowed in the GGNRA. 2. Any dogs that are allowed in the GGNRA should be leashed on a tether of six feet or less, and should be required to stay on a small number of carefully designated trails. Dogs must not be given full access to trails. Trails are for humans.

I am a medical doctor and have seen the adverse results of both uncontrolled and leashed dogs upon humans. I have also observed the environmental damage caused by dogs in our coastal areas. If off-leash dogs are allowed, they must be contained within small, supervised, fenced areas, which repersent a negligible portion of the public lands.

Correspondence ID: 1061 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 19:09:00
Correspondence Type: Web Form
Correspondence: I appreciate efforts to improve the circumstance in GGNRA with respect to dogs. I love dogs and share my life with a dog, but I think the impact of dogs on the GGRNA is widely apparent. If you look anywhere that dogs are in practice off leash you can quickly see where they are having an adverse impact on the vegetation and wildlife in that area. I would especially encourage that in areas where endangered or threatened species are known live, nest, stopover during migration that dogs be completely banned during times when they might disrupt the activities of wildlife.

Correspondence ID: 1062 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 19:12:13
Correspondence Type: Web Form
Correspondence: I walk my dog at Ocean Beach in the area approved for off-leash dogs. Out of all the miles of beach, this is a relatively tiny area and it is much appreciated. I go every week at least once and sometimes 3 times a week. I have never seen any misbehavior of any dogs over the past 4 years. Furthermore, it helps socialize dogs so that they are not a problem in contact

with other dogs and people. We now have more owners of dogs than parents of children. We pay taxes for education and recreation for families...well our dogs are our families and they deserve a place to play and interact, as well. PLEASE do not revoke the current privileges of off-leash access for our dogs where we can currently go...ie, Ocean Beach, Crissy Field Beach, etc. If possible, please confirm receipt and acknowledgement of this message. Sincerely, Jane Alexander

Correspondence ID: 1063 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 19:18:57

Correspondence Type: Web Form

Correspondence: Dogs are a public nuisance, a health and safety hazard, and cause environmental damage in the parklands. No dogs should be allowed in the park. If it is not possible to eliminate dogs from the parklands, then I would support the GGNRA Draft Plan.

Correspondence ID: 1064 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 19:24:38

Correspondence Type: Web Form

Correspondence: Option "D" (with the most protection for wildlife) is the most practical. Dog owners do not realize the damage caused by their pets beyond the immediate effects. There needs to be areas set aside where dogs are not allowed at all, including signs educating dog owners why their pets are not allowed, describing the damage that dogs cause. But any dog policy is useless if it is not rigorously enforced.

Correspondence ID: 1065 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 19:55:13

Correspondence Type: Web Form

Correspondence: I am a dog owner and a supporter of wildlife and nature. I frequently visit the GGNRA lands and I strongly recommend more stringent control of dog access to GGNRA lands. I have witnessed dogs harassing wildlife, including listed species such as the Snowy Plover. I have also experienced loose dogs running up and jumping on my leashed dog when I am trying to take a quiet walk through the park. I have also seen dogs digging and destroying vegetation off trail and in some locations I have seen large amounts of dog feces which are not cleaned up.

I love dogs and think they should have space to run and interact with other dogs. But wildlife and wild areas must be protected on the GGNRA lands

that are so popular will decline in beauty and species diversity. I think dogs should have specific areas where they are allowed off leash and other areas where dogs on leash only are allowed. I also strongly support restricting dogs from any areas where listed species are present (whether resident or migratory). Dogs should not be allowed to harass wildlife or to destroy habitat, this includes flushing birds.

Dogs are predators that can directly and negatively impact species and even a leashed dog can discourage species. Birds tend to flush with greater frequency even near leashed, well behaved dogs. I enjoy walking my dog on GGNRA lands but I also enjoy the wildlife and natural area. I am willing to leash or restrict my dog where necessary in order to protect wildlife.

Correspondence ID: 1066 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 20:12:56

Correspondence Type: Web Form

Correspondence: I am a Berkeley resident who frequently visits GGNRA sites for hiking outings on weekends. I have been hiking and picnicking at Muir Beach since 1978 and have seen many changes in that area over the decades.

Most disturbing to me is the overabundance of dogs off leash. I no longer feel comfortable picnicking or even sitting on the sand, as I've watched too many dogs urinate and defecate on the beach, with no owner in sight. Even when an owner is responsibly monitoring their dog's behavior, there's not much an owner can do when a dog has a loose bowel movement that cannot be picked up with a plastic baggie and tossed in a garbage can.

In addition, dogs off leash are a danger to toddlers and small children.

Please restrict all off-leash dogs to special, fenced areas within the GGNRA. And please make tiny, gem-like Muir Beach a completely dog-free area.

I support Alternative D of the Draft Dog Management Plan.

Thanks

Correspondence ID: 1067 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 20:33:28

Correspondence Type: Web Form

Type:

Correspondence: I would like to see Crissy field continue the way it has been with a loose leash law except in the areas where the snowy plovers spend the winter. This area should be protected more and be closed to both dogs and people. I

often go to Crissy field with my little dog and my binoculars. She needs the exercise and loves being off leash. I fret about her loss of freedom which she will feel as any person would. We walk the blue area. I also walk around Julius Kahn, the baseball field, lover's lane and the ecology trail. I found this dog; she went to ACC but needed to be rescued. I could see myself easily on the other side of this issue except I have this dog. I have had her for 4 years and we walk in the Presidio nearly every day. My real concern is about the dog walkers who I have found for four years to be responsible, thoughtful and genuinely good people. They pick up their dog's poop and any other they find. They like and some love the dogs in their care and know that their actions will affect their livelihoods. They are the one's I would hate to see get hurt. I walk 7 days a week and can testify that 5 days a week the park is being used and used well (that is the purpose of an urban park, isn't it) and rather empty without the walkers and their pals on week-ends. Almost lonely. I like the way things are and hope they stay that way for everyone.

Correspondence ID: 1068 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 20:53:52

Correspondence Type: Web Form

Correspondence: Dogs should not be allowed in the GGNRA period. The reason is that dog owners will completely ignore any rules. That is exactly what is happening now. Further, the authorities will not enforce the rules against the politically well organized dog owners.

I often visit Marin county and hike in the GGNRA. I have complained to the authorities many times, including photos, and they never do anything. It would be easy to enforce their own rules by making an example of a few of the flagrant rule breakers, but nothing ever happens.

The so called voice control areas are a complete joke. I have seen dozens of dogs running wild, jumping on people and barking in a threatening fashion. The owners call the dogs but the dogs pay absolutely no attention. The dogs of Marin county are spoiled and untrained. I have never seen a dog actually under voice control, but I have seen hundreds of wandering loose dogs.

There are professional dog walking businesses that use the GGNRA with impunity, bringing 10 or 20 dogs at a time, many off leash. I've complained about that too, but no action.

Dog owners often seem less intelligent than their dogs. One small (thankfully) dog hounded me, barking and snarling. The owner said don't worry, he's friendly. Mostly when you call out their law breaking behavior the dog owners say he's not bothering anyone or get a life.

I really think that most dog owners have zero objectivity about their dogs. They treat their dogs like cute spoiled children. They think that everyone must love their mutts.

Any dog running loose in the GGNRA should be captured and sent to the pound. This should be done right in front of the owners nose, just like when they tow your car. The owner can then pay \$500 to get their dog that they love so much back, or the dog can be sent to doggie heaven. That's a much better solution than citations. Instant justice.

Correspondence ID: 1069 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 21:28:52
Correspondence Type: Web Form
Correspondence: Please do not restrict off leash dog access to GGNRA properties.

Correspondence ID: 1070 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 21:41:21
Correspondence Type: Web Form
Correspondence: I live in the city. I am a responsible dog owner. I pay taxes. And I am strongly opposed to this proposal. This is a major city with a large population of dog owners and we use these recreational areas daily. This is not Yosemite.

The proposal is heavy handed and does not make sense. It forces all dogs leashed and unleashed into a small section of Ocean Beach, which is heavily used by families and tourists. Has anyone looked at the beach and how it is used? This is the most populated section of the beach. Also, if the beach is being closed to protect the snowy plover, why is it closed year round?

This proposal will decrease our quality of life. Walking your dog on the beach is a healthy pleasure that people have enjoyed for centuries. It is one of the joys of living in San Francisco. Don't take it away!

Correspondence ID: 1071 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 22:27:02
Correspondence Type: Web Form
Correspondence: Concerning Dog Management Plan w/in GGNRA, respectfully requesting consideration of the decades status quo off-leash allowances at Fort Funston and other key GGNRA areas. Notwithstanding the essential nature of conservancy and the need for balanced protection of the environment, the GGNRA sites in and around San Francisco are within and part of a major urban environment -- and the balance MUST include due consideration of

just how the parks are fully enjoyed by the people of San Francisco (the purpose of the parks, after all). Namely, the parks under consideration are places -- the only places -- where urban dwellers can enjoy time with family and with pets, and the value to us of doing so is a sense of freedom and fun that is increasingly rare in modern society generally and yet of increasingly importance given the stresses to us all. The additional proposed constraints with regard to parks use with dogs places the very real burden of those constraints upon the very people who support and use those parks, and goes against the spirit of these urban parks and the purpose for which they were intended (to be enjoyed). Please, do not curtail usage of the GGNRA sites with dogs; Seek to raise awareness of environmental concerns or fully eliminate foot traffic in select sites within GGNRA as may be required for species protection. But please do not implement restrictions on the parks in the current measure as this will serve only to make the lives of Bay Area residents worse, a poor decision even if carried out in the name of environmental protection. In striking a balance between views and constituents, laws affecting these parks must place the concerns and well-being of those people who routinely use the parks foremost. Thank you.

Correspondence ID: 1072 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 22:31:37

Correspondence Type: Web Form

Correspondence: I STRONGLY OBJECT to Map 4 Oakwood Valley and Alta Trail's "Preferred Alternative." It's almost worse than closing the entire area to dogs (which you seem to want to do on Map 4-D). In your "Preferred Alternative" dogs are on-leash for the whole of the Alta Trail from Donahue to the new gate! This is a horrible idea! There is no reason whatsoever to require a leash on the Alta! None!

The second part of this plan is even worse. The Oakwood Valley Fire Road and Valley Trail form a perfect leafy, shade-and-sun, peaceful forty minute loop walk for my dog and myself, yet you want to ban dogs completely from the best part of this walk--the Valley Trail. Once again, why?

I find Map 4-A the least objectionable simply because you deign to allow dogs on the Valley Trail, but this is not good enough. The whole of the Oakwood Valley / Alta Trail should be "Voice Control."

I have been walking my dog in both areas for over ten years and have never once encountered out-of-control dogs (although quite often out-of-control mountain bikers!) My dog and I have encountered much wildlife--numerous harmless snakes, bob-cats, several coyotes and twice a mountain lion at a distance--and we have shown respect in every case.

NEVER in ten years have I come across a dog that was off-leash that I thought should be on-leash. Never once did I think that my dog or other dogs I encountered were harming wildlife, frightening away birds, or destroying foliage in the surrounding area. Never once did I think my dog or any other shouldn't be allowed to walk or trot at their own pace, stopping to sniff the ferns when they felt like it, then running to catch up with their human, perfectly at home in the wild as they love to be.

Not one of your Map 4 plans is satisfactory to me as an owner of a very civilized, nature-loving dog. Indeed, your plans are truly insulting, not only to a dog-person, but to me as a tax-payer. I must wonder how much of my tax revenues went to planning time for these truly horrendous maps. Was there anyone working on them who actually cares for a specific dog? Or cares for dogs, period!

I think not.

Your maps are only slightly more insulting than your "Alternative Dog Recreation Areas" or whatever you call them. Dog parks? How can I run or walk with my dog in a dog park? She simply stands in the middle of all the dust and dog excrement utterly bored. As do I. No, dog parks do not stand in well as substitutes for the mossy, ferny scent-laden trails of the GGNRA.

Please rethink your plans entirely. Please rethink them with REAL dogs in mind, not the squirrel-chasing, yapping, brainless, slobbering, out-of-control dogs the Audubon Society would have you believe are wrecking the GGNRA.

Thank you, Laurel Bunce-Polarek (who is holding off on rejoining the Parks Conservancy until this dog-hating nonsense is over.)

Correspondence ID: 1073 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 22:50:46

Correspondence Type: Web Form

Correspondence: Don't give in to the crazies who treat their dogs as if they were children just because they shout the loudest. GGNRA is unique. It was made protected space for that reason. To give in to demands for non-conforming uses is to give up the protections that were so hard won. We do not build in GGNRA simply because people want to. We do not develop there simply because people want to. We do not introduce predatory non-native species in off-trail areas simply because people want to. That is what makes it a park!

Stand firm against non-conforming uses! That the point of having a park!

Correspondence ID: 1074 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please let us continue to exercise our dogs off leash at Muir, Rodeo and Stinson Beaches. Dogs and their owners really enjoy the freedom of off-leash play in the sand and water. We have far too few places where a dog can play off leash as it is. Most dog parks are small and confined spaces without adequate shade trees and access to water (e.g. Larkspur and San Anselmo). Dogs on leashes are also more likely to display fear aggression as they feel at a disadvantage to protect themselves when on leash. There are hundreds of miles of protected coastline for the wildlife. Please let us use a couple of beaches for recreational pleasure.

Correspondence ID: 1075 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I agree with the following statement: Please let us continue to exercise our dogs off leash at Muir, Rodeo and Stinson Beaches. Dogs and their owners really enjoy the freedom of off-leash play in the sand and water. We have far too few places where a dog can play off leash as it is. Most dog parks are small and confined spaces without adequate shade trees and access to water (e.g. Larkspur and San Anselmo). Dogs on leashes are also more likely to display fear aggression as they feel at a disadvantage to protect themselves when on leash. There are hundreds of miles of protected coastline for the wildlife. Let us use a couple of beaches for recreational pleasure.

Correspondence ID: 1076 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 23:37:08

Correspondence Type: Web Form

Correspondence: I've attended one of the GGNRA public open houses (SF State) regarding the dog management plan. After attending, I got a better idea of how much of current off leash dog areas are actually being taken away, especially at Fort Funston. The only areas that will be off leash is the sandy area near the parking lot and a section of the beach.

The area near the parking lot is not an area for dog WALKING. It is more of a dog run. Families who want to walk their dog off leash would no longer be able to receive the hiking experience from the trails. I go to Funston with kids now and they love the fact that they can run free on the trails with the

dog.

The suggested plan for Funston would not be accessible to disabled people on wheelchairs and canes and for families who bring their kids in strollers. In order to get to the trail where dogs will be only allowed on leash, everyone would have to go through the sandy area or the Chip Trail because the Funston suggested alternative map that was presented at the meeting shows that the paved area that leads to the rest of the trail (Sunset Trail) is off limits to ALL dogs, whether on or off leash. How is someone with a cane or wheelchair who is there with a dog supposed to get to the trail where dogs are allowed on leash? How are people in wheelchairs going to be able to utilize the proposed off leash sandy area when they can't even maneuver in it?

Beach access for off leash dog walking will be extremely difficult for those with canes and inaccessible all together to those who are wheelchair bound. The only access to the beach is down the flight of stairs near the parking lot and down the VERY STEEP sandy beach access trail. That is not practical or safe to anyone who is disabled. So in reality, someone wheelchair bound with a dog really has NO place in Funston to be with an off leash dog. GGNRA should do a review of their plans for Funston to consider disabled people.

Also, the section of the beach that is suggested for off leash dog walking is only from the staircase of the parking lot to the beach access trail. This stretch of the beach includes the outflow pipe. More often than not, the tide is high at that area and there is no way to get around that outflow pipe. So when tide is high, there's more space that is lost for off leash walking. Sometimes the tide is so high that you can't even access the beach safely in the proposed designated off leash section of the beach.

Considering the amount of use that Funston gets with people, dogs, hikers and hanggliders, it really isn't in as bad of a condition that GGNRA keeps reporting it to be. In my experiences in the past 10 years, it has been kept CLEAN, SAFE, and PLEASANT. Dog owners and dog groups organize numerous clean up days, in which they technically don't have to, since it should be up to National Park Services to maintain the recreational areas (which I do not see them at Funston often). And please clarify that these areas that GGNRA are trying to make changes to are RECREATIONAL AREAS, not national parks or the wilderness. With any type of RECREATIONAL AREA, whether dogs are allowed or not, there is bound to be wear and tear of the land.

At the meeting I asked a park ranger what is GGNRA's plans regarding more effective barriers for the plants that they want to conserve/protect and the answer I got was very disappointing. I was told that it takes a long time

for GGNRA to come up with the funding to replace the barriers and blown down fences, and it's not the priority at the moment. The current barriers now are posts with ropes, which are often covered up by the sand when the wind blows. Those barriers do not do a good job of preventing dogs OR HUMANS from crossing them. There were 4 teenagers the other day WITHOUT a dog who were able to easily step over the ropes and walk all over the plants. PLEASE STOP MAKING STATEMENTS THAT IMPLY THAT IT'S ONLY DOGS THAT DO "DAMAGE"! If GGNRA is able to find the time and funding to create this 2400 page plan for almost 10 years, why is it so hard to spend some time and money to replace the barriers to PROTECT the plants and environment you want to conserve? Isn't that GGNRA's main goal of all this? Also, by not taking immediate action to the fences blown down at the trail near the cliffs, human safety is at risk too! Maybe GGNRA can consider compromising, and instead of taking away off leash walking areas from dogs and people who visit the park the most, put some time and effort into improving the barriers and fences.

Please reconsider your plans and also take into consideration how your plans will affect the future of other public areas.

Correspondence ID: 1077 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 23:37:08
Correspondence Type: Web Form
Correspondence: I want to thank you very much for your leadership in this difficult issue. I vote and i FULLY support your proposal. I cannot tell you how many times I have had to remind dog lovers to clean up after their dogs. In the strongest words possible, I ask you to hold to the science you have presented and to move forward with your well thought out recommendations. Good Job!
Kathy and Gary Schaefer

Correspondence ID: 1078 **Project:** 11759 **Document:** 38106
Received: Mar,07,2011 23:56:26
Correspondence Type: Web Form
Correspondence: I am strongly in favor of the draft plan. I am in favor of strong leash laws, and even limits on the number of dogs that are allowed in some areas. Dogs stimulate fears and that destroys the enjoyment of serene environments. For example I am thinking of the beautiful stretch of beach at Crissy Field, from the Marina to Ft. Point. It is really terrible for walkers to encounter so many dogs there, especially those that are not on leashes. Also the dogs are dirty. And they scare the young children that are brought to the recreational areas. Put simply they simply destroy the experience.

It is simply not a right for a dog owner to "run a dog" in these areas. Indeed it is an infringement on the rights of others to enjoy our parks.

GGNRA is doing a good thing. Please continue to fight for your principles. Don't let the protests of the dog owners wear you down.

Correspondence ID: 1079 **Project:** 11759 **Document:** 38106

Received: Mar,07,2011 23:58:54

Correspondence Type: Web Form

Correspondence: our family would encourage the park service to choose alternative a.

dogs should always be on leash except in the areas now designated as leash free zones. there should be no extension of those zones.

when our family first moved to san francisco we realized dog owners were quite different than those from where we had moved. sf dog owners would walk the streets without leashed dogs and the spillover into parks was inevitable.

our enjoyment of Fort Mason quickly turned to concern as we saw dogs running without supervision while their owners engaged in conversations. twice one of our children was aggressively approached by a large growling dog.

we've been forced to find other areas of the city to enjoy the outdoors with our family. the Fort Mason area in particular is a gem that deserves better management by the park service. later, we've been told, dog owners were ticketed and things have quieted down. until there are rules proscribing dogs off leash we will not be able to enjoy an area so close to our home.

frankly, large dogs should be forbidden in the city limits as should known aggressive breeds. it is a form of animal cruelty for a large dog to be confined in an urban environment. owner self indulgence and loving a pet are very different things.

Correspondence ID: 1080 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 01:25:05

Correspondence Type: Web Form

Correspondence: I am strongly against limiting off-leash areas for dogs in the Golden Gate National Recreation Area. One of San Francisco's most appealing traits is its dog-friendly culture. Restricting dogs' access to local parks would be a huge

blow to the city, and to all animal lovers--locals and tourists. If San Francisco wants to live up to its progressive history, it can't curb the freedom of dogs and dog owners.

Correspondence ID: 1081 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 06:29:33
Correspondence Type: Web Form
Correspondence: I really don't understand how dog threaten the environment at Chrissy Field. I take my dog down there twice a day and see more human waste (sand buckets, kids wrappers, toys, trash) then I see dog waste. I also see more people walking in the roped off area then dogs. Having the ability to have our dogs off leash is truly a treat and one of the reasons this is such a great city to live in? Where else can you let your dog swim, socialize, and be happy? Quality of life for both the owners and their dogs. Yes, there are irresponsible dog owner but there are also irresponsible parents and people in general. Do we prevent these irresponsible parents from not having children? Do re prevent them from playing in the park if they leave their trash behind? No, we enforce rules of parks by giving tickets or other help/volunteer their time to clean up/ over compensate for these irresponsible people. Why isn't it the same way for dogs?

Keep the parks open to off leash dogs!!!!

Correspondence ID: 1082 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 07:12:55
Correspondence Type: Web Form
Correspondence: I support the plan to manage and regulate dogs in the GGNRA. There are plenty of alternative locations where dog owners can allow their pets to exercise without endangering native resources and intruding upon the experience of other park users.

Correspondence ID: 1083 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 08:19:39
Correspondence Type: Web Form
Correspondence: Please ban dogs and other animals from beaches and paths where my family can enjoy the GGNRA. I support your new proposed dog restrictions

Correspondence ID: 1084 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 08:45:52

Correspondence Web Form

Type:

Correspondence: I strongly support protecting wildlife by restricting off-leash dogs. I am a native San Franciscan and I an inspired by seeing wildlife thriving in nature. To my dismay, even areas with signs requiring dogs to be on-leash, have been over-run by off-leash dogs. I have seen wildlife chased by dogs. The areas where I can go birdwatching have become so limited, I have resigned myself to hour plus drives to go to remote areas where no dogs are allowed. I applaud your efforts to create a sanctuary for wild animals in the GGNRA. Thank you so much!

Correspondence ID: 1085 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 09:03:44

Correspondence Web Form

Type:

Correspondence: Like thousands of other residents of San Francisco and adjacent communities, I regularly walk my dog OFF LEASH at Fort Funston. Your proposed plan would so severely limit the off leash area at Fort Funston that it would effectively shut down OFF LEASH walking at that location. There is no other suitable location for off leash dog walking in the area.

I oppose any change to the existing rules permitting off leash dog walking at Fort Funston.

Most of the GGNRA is off limits to dogs. Most of the areas open to dogs do not permit off leash dog walking. The off leash legal areas are already quite limited. Please do not further limit the off leash rules at Fort Funston.

People who don't like dogs already have 95% of the GGNRA where they can go without being affected by the dogs they hate. Leave the tiny area where dogs are permitted alone so that we and our dogs can have a few small areas.

The GGNRA should share the park with dog walkers and dog haters. The dog haters are a tiny minority but they have control of 95% of the park. Leave the other 5% alone.

Correspondence ID: 1086 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 09:21:39

Correspondence Web Form

Type:

Correspondence: Too often, dogs on leash end up off leash, with bad consequences for native wildlife which have already lost much of their habitat.

Considering how humans have ruined so much habitat for wildlife, some sacrifices are in order to keep natural areas natural. It's selfish for people to disregard the needs of nature.

These are not city parks, but natural lands.

I used to run my dog on the beach when I was young and didn't know any better. My dog and I had fun but she did chase birds. I wouldn't do that again.

There are some beaches where people can run their dogs off leash. It's only right that birds have a bit of safe beach where they can feed, rest and raise their chicks.

Correspondence ID: 1087 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 09:33:58

Correspondence Type: Web Form

Correspondence: It's pretty clear just how "park starved" we are here in San Francisco. The second that even a "pocket park" is opened, throngs of people rush to it. There is not enough places for people to go to just simply sit, relax, and enjoy nature be it in the city or along the coastline.

Our pets are like our children. Limit or refuse them, you refuse us. Dog owners are like any other group. There are good ones, and there are bad ones. Just like parents, some of them control, monitor and discipline their children, others are completely irresponsible.

To lump all dogs and their owners into one group is not fair and it certainly does not include me. I take great pride in behaving like and controlling my dog like a good citizen and member of my neighborhood.

What we will see if this legislature goes through, is a major increase and movement into the even smaller city parks thus forcing even more crowding, and the neighborhood groups and committee's will be forced to deal with this same issue again.

I vote that the policy stay as is, no changes are made, and continued dialog and communication be held in case such issues continue to come up. But to take away this much needed, loved, and respected area from all of those with dogs is a major mistake.

Correspondence ID: 1088 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 09:36:10

Correspondence Web Form

Type:

Correspondence: As a regular visitor to the GGNRA, I cannot tell you how important it is to me and my family to be able to exercise our pets off leash. I absolutely understand the concerns of wildlife, unruly pets (and their owners) and habitat, but without allowing people legal places to take their animals many will continue to trample through critical habitat. Please allow the remaining 1% of GGNRA to remain dog friendly while enforcing the rules throughout the park.

Please feel free to contact me.

Correspondence ID: 1089 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 09:40:13

Correspondence Web Form

Type:

Correspondence: Please allow us to walk our dogs in these areas. Dog owners are vigilant about cleaning up after our pets. Thank you.

Correspondence ID: 1090 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 09:41:04

Correspondence Web Form

Type:

Correspondence: I love dogs and am not allowed to have one in the apartment that I live in. I take walks at Fort Funston so I am allowed to mingle with dogs, enjoy their diversity and get some exercise on top of it. I have never experienced nor witnessed any problems between people and dogs in all of the walks that I have taken. Owners are very conscious about monitoring their dogs and love the attention that I am willing to give their dogs. The "dog area" that you are proposing would be a travesty and ruin the whole feeling of Fort Funston as a great place to get your exercise and mingle with many breeds of dogs.

Correspondence ID: 1091 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 09:55:43

Correspondence Web Form

Type:

Correspondence: BAN THE DOGS. Here's why. Dogs that go off leash violate the core purpose of the GGNRA by harming wildlife and wrecking the park experience for the large majority of other visitors. We do not have the funds for the level of enforcement that would ensure dog owners obey ANY leash laws. Even though it is only "some" of the dogs there are enough problem ones, and the damage THEY cause is large enough, that the only affordable

way to prevent that damage is to ban the dogs. If those who want dogs, on or off leash, in this area that belongs to ALL the public, care to come up with enough money to reliably fund an enforcement staff, the picture will change. Absent such funding, the rights of THE MAJORITY, and the core purpose of the GGNRA as stated in the executive summary, REQUIRE that the harm done by dogs be ended in the only practical way, by a ban.

Correspondence ID: 1092 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 09:59:05
Correspondence Type: Web Form
Correspondence: I have been going to Ft. Funston for almost 4 years. I live in Pacifica, within walking distance to a great trail that does not allow dogs - leashed or unleashed. I've been lucky to never have witnessed all the problems the GGNRA reported on a local radio program. A local photographer harasses a bunch of us residents that get together at a future dog park site. I really don't have anywhere to run my dog that is close. Unfortunately those of us with big dogs have to run our dogs. My back and knees don't allow me to run with her. This can't be an easy decision but it seems the current draft mostly penalizes people with dogs. People adverse to dogs can go most places and not be burdened by off leash dogs but those of us with dogs have very few options for areas close to us. Now it appears even thos options will be restricted.

Correspondence ID: 1093 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 10:03:42
Correspondence Type: Web Form
Correspondence: I totally support this plan. However my concern is there will not be enough enforcement. This plan will require more funding for Park Rangers and USPP to regulate.

Correspondence ID: 1094 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 10:04:28
Correspondence Type: Web Form
Correspondence: I am writing in support of the Dog Management Plan. The public shouldn't have to risk being bitten by off-leash dogs at Ocean Beach or other parks. Furthermore, I have seen off-leash dogs at Ocean Beach chasing the endangered snowy plovers that nest there. I realize dog owners can be very vocal, but the public's safety must come first.

Correspondence 1095 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,08,2011 10:15:07

Correspondence Web Form

Type:

Correspondence: I currently enjoy the GGNRA with my dogs at least once every week. If these "preferred" plans were enacted I would probably not go to the GGNRA at all. I thought the GGNRA was supposed to be for urban recreation? How does this plan help? It is unbalanced and has no clear agenda other than to decrease usage overall. How can the Park Service justify that as part of their mission? The plan is unbalanced, unfair, discriminatory, and not in keeping with the Park Service mandate as an inclusive public agency. It needs serious revision, especially for the areas where LEASHED dogs would be excluded where they are currently allowed.

Correspondence 1096 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,08,2011 10:18:51

Correspondence Web Form

Type:

Correspondence: Have you considered a simple compromise - say dogs allowed off-leash at Fort Funston from dawn to 10am and from 4pm to dusk? During the other hours dogs on leash only?

Correspondence 1097 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,08,2011 10:22:11

Correspondence Web Form

Type:

Correspondence: Would the authors of this report please take one walk on the Bluff trail at Mori Point. After you have tripped over the concrete that has been there since WWII, then marveled that the new graffiti that appears every week, the lost count of the volume of invasive species, then seen how many user are dog owners (very high percentage), then please tell me how excluding ON LEASH dogs helps?

This report is about the "environment" in name only. What this report really wants is to decrease GGNRA usage, period. Shame on the Park Service for supporting these so-called preferred plans. And to think our public monies paid to write this! I used to have great respect for the Park Service. Shame.

Correspondence 1098 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,08,2011 10:34:19

Correspondence Web Form

Type:

Correspondence: I just want to voice my opinion about the dog situation. Every day it seems as if we Americans are giving up a little piece of freedom. Now we are told how to handle, walk and where we can take our dear pets. I need outlets for my pets and by allowing free leash and walking sites we are preserving our American heritage.

Please allow us to continue as we have for many years the opportunity to let our pets run free!

Correspondence ID: 1099 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 10:35:46

Correspondence Type: Web Form

Correspondence: I am one of the thousands of people who enjoy the off leash areas in the Bay Area. I am there with my dog every possible opportunity I get. To deprive us of this benefit to enjoy these open spaces would be an absolute travesty. It is one of the reasons I choose to live in the Bay Area.

Please do not remove the opportunity for us to enjoy nature with our best friends. It is one of life's simple pleasures.

Thank you Gina Emett

Correspondence ID: 1100 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 10:47:37

Correspondence Type: Web Form

Correspondence: I AM TIRED OF ALL THESE DOG OWNERS NOT SEEING REASON.

And I'm not the only one. GGBRA has a good plan for the park and for everybody, and I think it should pass. I used to live in SF for many years, and love dogs enormously, but was not always happy seeing dogs everywhere. Too many dog lovers are very selfish and very passionate and can easily dominate the conversation - to the exclusion of all others. It would seem more fruitful for them to work to find other, less-sensitive, areas that they could keep their dogs off-leash. All their arguments for the beauties of off-leash walks are valid, but are beside the point here. NOT HERE, at the GGRA, please.

Correspondence ID: 1101 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 11:10:06

Correspondence Type: Web Form

Correspondence: Please do not close Muir, Rodeo, and Stinson Beaches to off-leash dog walking. It is a lovely venue for exercising our pets in the sand and water. There are so few areas for dogs to enjoy off-leash exercise. So many dog parks are small and confined without shade cover or water. Off leash dogs are usually so busy enjoying themselves there is no aggressive behavior.....

We have many miles of protected coastline for wildlife....let's not add more restrictions to an already regimented world.

Correspondence ID: 1102 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 11:19:57

Correspondence Type: Web Form

Correspondence: Please don't let the ability for my dog to run free in these park areas be taken away. There is so little available space in SF for him to run free, I feel his life will be much less happy and healthy if this freedom is removed from his and our lives.

I realize some people think 'they are just dogs'. My husband and I do not have any children, so our dog is our 'baby'. We are concerned with his well being and happiness. We feel very fortunate to have places in SF where his dog walker can take him, where he can socialize with other dogs and exercise and get some fresh air. Taking away this part of his day/life would be a huge change, and not a positive one. Please do not allow this to happen. I would imagine this would also have an impact on the many dog walking businesses around the city, as we would probably not pay for the service if it did not include the 'running free' activity during the daily walk.

Thank you for your time and consideration. Susan D'Amours SF, CA 94102

Correspondence ID: 1103 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 11:24:01

Correspondence Type: Web Form

Correspondence: I strongly support the GGNRA Draft Dog Management Plan.

Numerous times, we have visited areas of the GGNRA and found dog owners violating either leash restrictions or areas off limits to dogs. This experience includes dogs running unleashed at beaches clearly marked as nesting areas for endangered shore birds in Marin County. Stewardship of our scenic heritage should not include providing access to people's pets so they can run amuck and prevent shorebirds and other wild species from reproducing. We do not need to provide beaches and trails for the pets of citizens. That is poor use of our public lands.

Correspondence ID: 1104 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 11:39:02

Correspondence Type: Web Form

Correspondence: I am deeply disappointed by this effort to severely curtail off leash dog walking areas by the GGNRA. As an owner of two dogs in San Francisco, I utilize the services of a dedicated dog walker, who I am completely dependent on. He takes my dogs on a walk every workday, and uses the enclosed dog parks in the city. I also live close to an enclosed dog park area (Berry St). If the GNNRA draft dog management plan is passed, there will be a number of serious negative impacts upon not only myself, but also upon my neighborhood, including the following: 1. My dog walker, although he does not go to the beaches on a work day basis, will be directly impacted because the many dog walkers who do take their clients to the beach will no longer be able to do so, and will therefore go to the already limited enclosed dog park areas. As a result, his normal parks will become overcrowded. 2. My local dog park area will become increasingly overcrowded, thus increasing the likelihood of an possible incident, as well as noise and management difficulties. 3. If there are limitations of 3 dogs/dogwalker, walkers will be forced to limit their time and schedule with their clients. As a result, each dog will receive less time outdoors, and possibly be scheduled at increasingly unreasonable times. This will lead to less exercised, more neurotic dogs in the neighborhood, and will be detrimental to everyone.

At the end of the day, I feel like this is a misguided attempt to recharacterize the purpose of green spaces, which should be designated in urban areas for recreation. While it is true that recreational use requires more upkeep and maintenance, I believe that green space should be for enjoyment through recreational use, which includes a safe place to play with one's dog, rather than simply observation, which is what strict preservation policies such as this plan suggest.

Correspondence ID: 1105 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 11:48:16

Correspondence Type: Web Form

Correspondence: I am disappointed that the open house format was used instead of an open forum. I feel that without vocalizing in public, my concerns will not be heard.

I support keeping the rules as they are now.Do not impose new rules or

laws.

Leave GGNRA dogs alone!

Correspondence ID: 1106 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 11:48:34

Correspondence Type: Web Form

Correspondence: My name is Mary Juliani and I am a resident of New Mexico although I had lived in San Francisco, CA for 23 years. At the time I lived in S.F. I took my dogs to Fort Funston for 12 years. and had always found it to be a safe and beautiful place for both me and my dogs.

I wanted to add my comment because the DEIS report fails to quote from respondents who had positive opinions about off-leash recreation to the same extent negative comments were quoted.(DEIS,chpt 3,p 279). 49% of people surveyed responded negatively, which means 51% responded poitively. I would like the report to be revised so that more than half of the comments from visitors and non-visitors to the park be quoted from positive respondents, as reflected in the survey.

My experience with my dogs at Fort FUNston was always fun and exciting. My dogs always met me at the front door for their trip to the beach. To be able to play on the beach with their friends (just like children) was certainly not only fun for them but certainly for me.

Won't you please reconsider the leash law. It would break my heart and certainly our four legged friends if they were not allowed to have that freedom.

Thank you.

Mary T. Juliani

Correspondence ID: 1107 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 11:51:46

Correspondence Type: Web Form

Correspondence: Crissy field should be kept open for dogs without leash in restricted areas. There should be strong warning sign posted for large fine for dog owners who do not clean up after their dogs. Park rangers should visit at least twice a day to discourage people from dirtying the place with dog excrement. This is one of the few areas left in the Bay Area where both the dog and its owner can have nice time on a sunny day. Please do not make the area too

restrictive for peaceful people who happen to own dogs.

Correspondence ID: 1108 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 11:52:34

Correspondence Type: Web Form

Correspondence: I attended the open house last night and learned that one of the criteria is that the rules be easy to understand. More specifically that this was a barrier to some plans not included in the options presented to date. To me this is a joke and simply an excuse to rule out very functional solutions that have no other justification for ignoring.

For example. Specifically, allowing extra off-leash room during set times of day. This was deemed to complicated and not an easy rule to understand. That is a joke and frankly a sad excuse to eliminate a good solution to balancing park usage.

Currently many areas of the park have the rule park closed from dusk to dawn. The signage does not clarify the definition. This is hardly a rule that is easy to understand. When exactly is dusk or dawn? Even if you have a legal definition the average park user has no idea what time that is on any given day.

Alternatively, a simply sign that says off leash under voice control ok from 6am - 9am seems pretty clear.

Clearly the easy to use rule is a fake standard not currently enforced. Or worst yet is a subjective standard manipulated to suit a purpose. Please reconsider both the application of that rule for all solutions and more specifically for timed off leash access.

Correspondence ID: 1109 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 11:54:55

Correspondence Type: Web Form

Correspondence: To Whom It May Concern:

I am a local resident and have been a dog owner for almost 2 years. Every single morning and evening my dog, Smokey, and I frequent different off-leash areas controlled by the GGNRA. We run down to Chrissy Field Beach every morning and Smokey enjoys his time romping and swimming in the waves. He also gets healthy socialization with other dogs there. We always run through Fort Mason and along the Marina to get there. We used to live one block from Ocean Beach and would be down there every morning and

evening walking. Once every weekend (and when we're both lucky - sometimes twice) we always get to Dog Heaven (Fort Funston). We both love the exercise and natural beauty we get to enjoy with other animal lovers. I am deeply concerned and upset that the GGNRA is trying to take away the off-leash space we currently have. The compliance based management strategy is far to restrictive and the majority of responsible dog owners should not be punished by the actions of a very few irresponsible dog owners. And, it is not clear how compliance would be regulated - by cameras? by police force? How are my tax dollars going to be used to enforce this change? Why isn't that clearly stated?

The preferred alternative is not acceptable and seems to go against all of the values San Francisco as a place exudes. All of the dog owners will be segregated into smaller spaces and inevitably create more conflict. And what will happen to city parks? This issue is not being addressed.

Let's create a new alternative with a balance between recreational use and protection of natural resources. And what is the GGNRA doing to address all of the studies that show people without dogs disturb protected species? The snowy plovers are a good example of this and only roost at Ocean Beach; they do not nest because the dunes were not built large enough for them to.

This issue is an emotional one. I know Smokey is well-behaved when he is exercised. We both need this in our lives. Please do not take this freedom and basic right away from us.

Sincerely, Marcelle Miller and Smokey

Correspondence ID: 1110 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 11:55:48
Correspondence Type: Web Form
Correspondence: Fort Funston and other dog friendly territories within the GGNRA provide the needed space, as well as a conducive atmosphere for canine socialization, exercise, and rehabilitation. Fort Funston is and has been for decades, a successful model of a shared space for public use. Hundreds of responsible dog owners, dog walkers, and their dogs co-exist peacefully with birds, horses, handgliders, children, seniors, the handicapped, and other nature lovers, on a daily basis.

Without proper exercise and space to release energy and socialize, our dogs will develop many physical and behavioral problems. The proposed Dog Management Plan is unfairly restrictive to dog owners, and does not match or serve the needs of the surrounding community. The community can only

be served by having more urban parks and more open space, not less. We should oppose the federal government's position of eliminating the "recreation" from OUR parks and territories. If it's not broke, than don't fix it.

I have had the same dog walker here in San Francisco for 15 years. He hasn't missed a single day during that time. He is very conscientious and great with the dogs. Most dog walkers are. To require the extensive certification and training is an extreme hardship on these people. Why should 80% of the dog walkers pay for the 20% who are suspect? San Francisco cannot exist without their aid. Dogs need a place to run freely while respecting the environment. In my 17 years here in San Francisco, I have never seen an individual at Fort Funston WITHOUT a dog.

I am a nature lover, dog owner, taxpayer, and registered voter. Thank you for your consideration. Donna Riley Hoppes

Correspondence ID: 1111 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 12:10:20
Correspondence Type: Web Form
Correspondence: The plan is overly restrictive.

Correspondence ID: 1112 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The GGNRA should develop a new alternative, the A+ Alternative, that will better balance the recreational needs of the Bay Area with protection of natural resources. The DEIS calls the "No Change" Alternative "A". This is the 1979 Pet Policy with some restrictions, particularly restrictions on off-leash at Ocean Beach, Fort Funston, and Crissy Field because of the snowy plover and native plant restorations. More than one-third of Bay Area residents have dogs and we now know the importance of off-leash recreation for dog's physical and mental health, as well as the importance of the significant social communities that develop where people recreate with their dogs off-leash. This large segment of Bay Area residents should not be restricted to significantly less than 1% of GGNRA land (that is how much GGNRA land is available for off-leash recreation in Alternative A) to have a satisfactory park experience, especially since there is little scientific evidence supporting restrictions on off-leash. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the Bay Area. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-

leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and education where problems arise. Enforcement of already existing regulations should target irresponsible dog owners who create the few problems documented by the GGNRA, while allowing responsible dog owners to continue their traditional off-leash recreation without harassment.

Correspondence ID: 1113 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 12:30:30
Correspondence Type: Web Form
Correspondence: I just wanted to chime in on this topic from a different perspective then many dog owners - I am all for requiring dogs to be on leash in the GGNRA outside of enclosed special areas for the protection of the wildlife as well as safety and sanitary issues. I am a longtime dog owner and have had no problem taking good care of them, all happy healthy and long lived, without allowing them to run around willy nilly in national park areas - it honestly seems to be more about the owners and dog walkers preferring to let dogs roam and be in the natural area vs a dog park. Considering the ramifications though, of dogs harming the wildlife (and they do all the time, especially all kinds of birds and their nests), dog poop all over and other issues with dogs being loose and not controllable the leash restrictions make the most sense. The balance would be to add some more, and good quality in good locations, enclosed dog parks and let people walk with dogs on leash in natural areas - this way there will be places for dogs to play and you can still enjoy walking around the beautiful areas with your canine buddy.

Correspondence ID: 1114 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 12:37:10
Correspondence Type: Web Form
Correspondence: Further restricting the already too limited areas in the Bay Area where dogs can be off leash is a bad, and wrong-headed idea, and runs very much against the rights and interests of Bay Area dog owners, dog professionals, dog lovers and especially, dogs.

Sufficient public space MUST remain available in those areas that currently allow it to ensure that dog owners and walkers have accessible local places within reach of our urban communities to exercise and socialize their dogs in a way that supports the proper physical and social needs of these animals. Dogs require sufficient levels of physical exercise and socialization in their

daily regimens that cannot reasonably be attained unless they are permitted to be off leash in outdoor environments that support positive interaction with other dogs and people. Dogs lacking in sufficient exercise and socialization skills are at greater risk of developing poor behavior and social skills that runs counter to the animal's and the public's interest.

MOST DOG OWNERS ARE RESPONSIBLE guardians and neither they, nor their beloved pets, deserve nor can afford to suffer the negative impacts this measure will have on the health and well-being of their animals, their families and their communities.

Shame on any person, politician or business that supports these measures to restrict off-leash access for dogs in our friendly community. You will not enjoy my vote, my patronage or my friendship.

rg

Correspondence ID: 1115 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 12:46:50

Correspondence Type: Web Form

Correspondence: Dear Sir or Madam, I have read parts of your draft as well as some of the news coverage around this issue. I hope to make points quite clear:

1. I am a dog owner. I do not wish to see the GGNRA put these leash laws into effect.

2. I do believe there is a simple solution. Just as you would ask a disruptive, intoxicated and/or annoying person to leave and/or ticket them, I believe the same standard could be used for dogs. If the dog is not being aggressive, obtrusive or annoying to others (including other wildlife) then let the dog run around off leash. If the dog is a nuisance and the owner has failed to do re-leash the dog, then I believe they should be ticketed and/or asked to leave.

Thank you.

Correspondence ID: 1116 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 12:50:13

Correspondence Type: Web Form

Correspondence: Having dogs off the leash is dangerous and should not be allowed.

Correspondence ID: 1117 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 12:52:36

Correspondence Web Form

Type:

Correspondence: Comments on GGNRA Dog Management Plan/EIS

My wife and I have been coastside residents for over thirty years, during which time we've walked our various dogs on coastal trails a minimum of three times a week. Frequently the only humans we'll see are also dog walkers. We drive twenty miles each way to get access to safe, legal, dog friendly land. Please do not take it away.

We request "Alternative E".

Thank you.

Correspondence ID: 1118 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: 3) The GGNRA should develop a new alternative, the A+ Alternative, that will better balance the recreational needs of the Bay Area with protection of natural resources. The DEIS calls the "No Change" Alternative "A". This is the 1979 Pet Policy with some restrictions, particularly restrictions on off-leash at Ocean Beach, Fort Funston, and Crissy Field because of the snowy plover and native plant restorations. More than one-third of Bay Area residents have dogs and we now know the importance of off-leash recreation for dog's physical and mental health, as well as the importance of the significant social communities that develop where people recreate with their dogs off-leash. This large segment of Bay Area residents should not be restricted to significantly less than 1% of GGNRA land (that is how much GGNRA land is available for off-leash recreation in Alternative A) to have a satisfactory park experience, especially since there is little scientific evidence supporting restrictions on off-leash. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the Bay Area. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and education where problems arise. Enforcement of already existing regulations should target irresponsible dog owners who create the few problems documented by the GGNRA, while allowing responsible dog owners to

continue their traditional off-leash recreation without harassment.

Correspondence ID: 1119 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 12:57:37

Correspondence Type: Web Form

Correspondence: From the executive summary: ---Protect native wildlife and their habitat (including sensitive species and their habitat, and federally or state listed, unique, or rare species) from detrimental effects of dog use, including harassment or disturbance by dogs. >>> this can be addressed with signage / low easy to install fencing. This solution works really well at Crissy Field to protect specific areas and could work well in other areas as well. --- Minimize degradation of soil and water resources by dog use. >>> Will bicycle usage also be addressed? The damage from bike usage is typically much greater than damage from walking (People or dog) ---Commercial dog walking. >>>Here I have a problem, it would seem that four dogs is about the maximum number that a commercial dog walker can control at any point in time. Saw a woman with 13 dogs off leash at Crissy Field last weekend - that appears unmanageable. There were numerous walkers walking 6 dogs off leash, this number as well seems excessive. It would appear that 3 to 4 dogs is about the maximum that any commercial dog walker can effectively handle and still keep control of the animals. ---Permits would restrict use by time and area. Permits would be issued for the following sites: Alta Trail, Rodeo Beach, Fort Baker, Fort Mason, Crissy Field, Baker Beach, and Fort Funston. >>>Timing of commercial dog walking becomes important - during peak pedestrian (weekend, early morning, late afternoon) usage the number of dogs being walked by a commercial dog walker would need to be curtailed to ensure proper control.

Overall Options C & E seem like a good compromise and will protect the GGNRA for future generations.

Thanks

Correspondence ID: 1120 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 13:27:44

Correspondence Type: Web Form

Correspondence: I am not a dog owner but I do not agree with this dog management plan. I honestly don't see many dogs on city streets off leash currently and if this plan goes through, I feel all that will change. I enjoy not having dogs running free on city streets. And this is probably because most dogs in the city go to the off leash dog areas like Funston and Chrissy Fields so dogs can run free and safely away from traffic. I think if the off leash areas are

limited and/or taken away, there WILL be more dogs on and off leash walking on city streets. That can potentially lead to more problems and incidents.

I feel that the current off leash areas in San Francisco should remain the same. I do know some dog owners and they say that Funston is the most popular off leash dog area. If limitations are going to occur regardless, I suggest maybe leaving Funston the way it is and limit all the other off leash areas in the city so that the regulars in the smaller areas can all divert to Funston. At least they will still have a large area for the dogs to run around instead of in city streets and small city parks.

Correspondence ID: 1121 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 13:27:56

Correspondence Type: Web Form

Correspondence: Currently residing in Sausalito, my well behaved, large dog and I frequent Marin dog parks as well as the beautiful San Francisco dog parks + dog / people parks. I am baffled by the want or the need to "curb" /place restrictions on dogs and dog owners in these areas. Not once have we experienced any type of mishap-- dog based or people based.

Having lived on East Coast, Rockies, and Midwest-- never have we experienced the sophistication and friendliness that we have experienced here.

It seems unbelievably unnecessary and backward in my mind!

Why is this happening to this beautiful, free, pet friendly area-- it is mind-blowing and completely backward!

Please reconsider such an unnecessary restriction.

Sincerely, Jennifer and Lola

Correspondence ID: 1122 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 13:49:14

Correspondence Type: Web Form

Correspondence: I am a regular at Funston. I take my dog there for off leash dog walking. I also go to Ocean Beach for morning walks but without my dog. It's hard to believe that dogs cause more harm to the environment/land/wildlife than humans do. At Funston, I always see people crossing the barriers, walking across the plants that are trying to be preserved. Most of these times, the

people don't even have dogs with them.

At Ocean Beach, there is always trash left by humans like bottles, bags, food containers and wrappers. And how about the mounds of burnt wood people leave from bonfires? That has to be harmful not only to the land plants and animals but also to the ocean life when these burnt pieces of wood drift out into the ocean!

And the snowy plover...alot of accusations that dogs are chasing them away and digging up their eggs! I see kids chase the birds on the beach more than I see dogs doing it. The high winds at Ocean Beach often blow the sand in all different directions and off the beach completely. Has GGNRA considered that as the source of eggs being uncovered and moved?

This plan has a lot of finger pointing towards dogs and it just seems like the blame for any kind of environmental damage is being put on the dogs even though humans do way more harm! How come GGNRA doesn't compose a "Human Management Plan" to stop humans from "disturbing plant and animal life?"

Correspondence ID: 1123 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 13:53:12
Correspondence Type: Web Form
Correspondence: March 8, 2011 ? Frank Dean

General Superintendent Golden Gate National Recreation Area Building
201, Fort Mason San Francisco, CA 94123-0022 Or, email comments here:
<http://parkplanning.nps.gov/projectHome.cfm?projectId=11759> Laura H.
Ward San Francisco, CA 94127

Dear Mr. Dean: I believe that the recommendations in the GGNRA Draft Dog Management Plan are overly-restrictive and represent a major departure from the current, balanced use of the park. Currently, off-lead activity is restricted to less than 1% of the park's land. This proposal would drastically reduce the land available for off-lead recreation. The plan is difficult enough in San Francisco and Marin counties, where beloved areas like Fort Funston and Muir Beach will be restricted or off-limits to off-lead dogs. Worse, the plan leaves San Mateo with no GGNRA land that permits off-leash use. In addition, the proposal that any new lands added to the GGNRA allow no dog walking of any sort (even on-lead) unless a specific exception is made is draconian and ignores the needs of future generations of dog guardians as the region's population grows. The GGNRA's proposal in the event of "noncompliance" with its rules are heavy-handed and do not engage the community to find solutions. The proposal indicates that if noncompliance is

observed, "the area's management would be changed to the next more restrictive level of dog management. In this case, ROLAs [regulated off-lead areas] would be changed to on-leash dog walking areas and on-leash dog walking areas would be changed to no dog walking areas. This change would be permanent." This approach unnecessarily punishes responsible dog guardians for poor behavior by a small minority. Further, the idea that no area could ever be changed to less-restrictive rules, such as when compliance is good and environmental protection needs are reduced, is one-sided and unfair. Responsible dog guardianship is entirely compatible with environmental stewardship. I recognize that there are guardians who should be more responsible with their dogs. But they are few in number ? incidents involving dogs in GGNRA are less than 4% of all incidents in the park. Penalizing all dog guardians for the behavior of a truly small minority is not the right approach. It is unfair. The dog lover's community actively works hard to educate and encourage responsible dog guardianship. Examples include: ? Community volunteer efforts to stock dog poop bags and other amenities ? Launch of the Eco-Dog website (www.eco-dog.org), a community-funded online resource encouraging and educating about responsible guardianship ? Community educational collateral and workshops distributed and conducted by local dog walking and advocacy groups ? Community policing and "peer pressure" ? Low-cost and free dog training classes at the SF SPCA, Marin Humane Society and Peninsula Humane Society/SPCA. I believe this collaborative, community based and educational approach is best and encourage the GGNRA's partnership in these endeavors as a viable alternative to simply closing areas to dogs or placing new unfair restrictions. The GGNRA's goal has always been to bring the park into compliance with a federal rule (36 CFR 2.15) which bans off-leash dog walking in national parks. But the San Francisco Bay Area has a unique culture, history and community. Instead of trying to force the GGNRA to look like every other national park, the GGNRA board should respect the citizens' commission of 1979 and the unique history of the land. The proposal also ignores the needs of dog guardians with limited transportation options or with special needs, such as wheelchair access. As evidenced by the work of organizations like Pets Are Wonderful Support who support low-income disabled and senior pet owners and document the health benefits of the human animal bond, this proposed plan would limit access for an entire class of people who have few other options and depend on the current off-leash areas to keep their dogs exercised and healthy. In closing, I believe we should be seeking ways to make the San Francisco Bay Area friendlier to dog and cat guardians. The GGNRA's proposal is a step backwards for animal welfare in the Bay Area. I look forward to working with the GGNRA Board to modify its proposal to be more balanced and friendlier to dog guardians.

Sincerely,

Laura Harrison Ward

Correspondence ID: 1124 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 14:11:42
Correspondence Type: Web Form
Correspondence: Please keep the off-leash dog areas open! There aren't many places to take your dog in the bay and let them run free. Make no changes or increase the number/size of off-leash areas.

Correspondence ID: 1125 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 14:24:13
Correspondence Type: Web Form
Correspondence: I am a Montara resident and a homeowner. I have lived here nearly 14 years. We have always walked our dogs on Montara mountain, and most everyone I see has a leash. I believe you need to see this issue from the perspective that this is our neighborhood. This is the back area of where we live, and it is where we walk our dogs. How can you expect us to go for a walk and not take our dogs with us?

I want to be able walk my dog on the trail that I have always walked my dog, and I don't care if a leash is necessary. I always have one. 99 percent of the dogs out there are friendly, but of course there is always a chance that someone will have a dog that is not, so we have our leashes with us. To be honest, not everyone has the dog on them at all times, but when we see someone coming toward us, we put the dog on the leash while we pass by. I think that is a very reasonable way to do this, but I understand if we need to keep them on the leash. That is reasonable change. What is not reasonable is to tell us that we cannot take our dogs with us when we go for a walk.

In Montara, it seems that every other home has a dog. We walk a lot of dogs every day. I probably see 20 or more dogs walking every day. This was and is a part of the lure and benefit of living here, and one of the reasons we decided to live here.

Correspondence ID: 1126 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 14:39:32
Correspondence Type: Web Form
Correspondence: As a San Francisco Resident and Small Business owner I am writing to express my opposition to The Golden Gate National Recreation Area's proposal to eliminate off-leash dog areas in many Bay Area parks.

Before owning a dog I visited areas such as Muir Beach, Fort Funston and Crissy Field often and without notice or concern for any problems incurred by careless dog owners. In fact, the existence of such pets with owners at these locales brought an element of friendliness and camaraderie that always served to increase the regions' approachability and sense of destination value.

Now, years later as a responsible dog owner I continue to frequent these parks as many as 5 times per week. I keep my dog on leash the majority of the time, that is along the paths and in and out of the facility, and we always clean up after ourselves, without exception. Frequent visits of these nearby parks are a major reason why I choose to continue residing in San Francisco.

I certainly understand that there are those who favor closing these areas to dogs all together or requiring that all dogs remain on leash at all times. Is there not some sort of agreement that can be reached in the form of higher fees and penalties for careless owners that neglect to clean after their dogs? As for aggressive canine misbehavior, these parks don't appear to be the type of environment that represents a destination for the careless and irresponsible owners of violent or otherwise aggressive dogs.

There are so many of us who practice daily responsible care for our pets and appreciate all these parks have to offer. On behalf of this group I thank you for your time and ask you to please consider rejecting these current efforts at GGNRA canine restriction.

Thank You and Regards, Sky Wegman

Correspondence ID: 1127 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 14:46:53
Correspondence Type: Web Form
Correspondence: Please let us continue to exercise our dogs off leash at Muir, Rodeo and Stinson Beaches. Dogs and their owners really enjoy the freedom of off-leash play in the sand and water. We have far too few places where a dog can play off leash as it is. Most dog parks are small and confined spaces without adequate shade trees and access to water (e.g. Larkspur and San Anselmo). Dogs on leashes are also more likely to display fear aggression as they feel at a disadvantage to protect themselves when on leash. There are hundreds of miles of protected coastline for the wildlife. Let us use a couple of beaches for recreational pleasure.

Correspondence ID: 1128 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 14:53:55

Correspondence Web Form

Type:

Correspondence: I am an active hiker and kayaker who enjoys the use of the GGNRA both with and without my dogs. We live in a highly urban area. Luckily there are park options for many different segments of users. One of these segments should be dog owners who want to hike/run/exercise with their well trained and socialized dogs.

only 1% of parks allow for this type of exercise. Those who do not want to interact with owners and their dogs have 99% of the other GGNRA to exercise, enjoy or not go at all if they feel that wildlife might be impacted by their presence.

I hike/vacation all over the US and the world - we are about the only country/area that is so dog unfriendly. In Europe dogs are allowed in restaurants, trains, parks etc.

An urban park is just that - urban and meant to be USED and ENJOYED by everyone. Trying to make it a wilderness or untouched by humans is unrealistic and frankly a poor use of my tax dollars.

If money/time is to be spent - spend it on enforcement - people who do not pick up after, maintain control of or manage their dogs should be fined every time they do so. THAT will correct problems - not banning them.

Correspondence ID: 1129 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 15:21:56

Correspondence Web Form

Type:

Correspondence: Regarding proposal to severely restrict off-lease dog walking at Fort Funston:

Map 16-A appropriately marks the areas where off-lease dog walking is permitted including the fenced areas which are off limits; this map reflects the parameters of the 1979 Dog Policy, which the US Federal Court upheld in 2009.

What the Draft Dog Management Plan fails to do is provide CONTEXT for Fort Funston. This is an URBAN recreational area, not wilderness, and it is surrounded on 3 sides by 2 private golf courses, a gun club and a city sewage treatment plant. None of this surrounding highly developed land will ever be incorporated into the GGNRA and it is sheer folly to pretend to preserve plants and wildlife that are acclimatized to the current off-lease uses at the Fort.

For further CONTEXT, over the last 15 years since this issue of dog "management" was first raised, the GGNRA has been slapped down in court for failing to follow its own policies and attempting to nullify the 1979 Pet Policy. As a frequent walker at the Fort, the only aspect of it that has changed is due solely to the acts of wind, rain and surf on the place. The "habitat restoration area" is now covered in tons of sand, not one blade of native grass remains. Dogs have nothing to do with this. The cliffs are collapsing because of wind, rain and surf, not dogs (perhaps the bank swallow burrows destabilize the cliffs, but that was never investigated in your 2,400 page report).

One note about birds. The ravens chase the dogs, not vice versa. Any birds on the beach need only fly 50 yards in any direction to be free of dogs.

The dog people have abided by rules of having dogs under voice control, picking up after our dogs and leashing them when necessary; we have also abided by the temporary closures, illegal fences and other restrictions. There is no reason to penalize the many lawful dog owners for the errors of the very tiny minority which GGNRA rangers should police.

Correspondence ID: 1130 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 15:46:11
Correspondence Type: Web Form
Correspondence: Please do not pass this more restrictive leash law. There are fewer and fewer places we can take our dogs to run. My dog after coming back from a run on the beach is calm and well behaved- a model of good dog behaviour. As great as walking her on a leash is- she simply cannot get the same level of exercise as when she's allowed to run free- with supervision of course. While I understand there are reasons to restrict dogs- surely there's room enough in the Bay Area to allow our dogs to run with some freedom. It's one of the reasons I live here, it's one of the reasons I have a dog. Please don't enact this more restrictive leash law.

Correspondence ID: 1131 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 16:18:36
Correspondence Type: Web Form
Correspondence: I have enjoyed using GGNRA sites at Sweeny Ridge, Milagra Ridge, and Mori Point for a wide variety of activities including hiking, jogging, mountain biking, and dog walking for the past two decades. For the past decade, I have recreated in these areas daily. Access to these areas is was a major influence in my choice to move back to Pacifica and teach at Terra Nova high school after college.

I would be deeply saddened to see adoption of any sort of "no dogs" policy in these areas (as at least a few of the "B, C, and D" alternatives propose). This is for the following reasons:

1. I enjoy walking my dog in these places.
2. I am not bothered by other people walking their dogs in these areas.
3. To me it seems like these places get very little use considering how many people live very close to them. I'm out there for about an hour a day and I usually bump into one or two other people. A fairly large portion of these people are walking dogs, so it seems that by adopting a "no dogs" policy you would be choosing to affect in a negative way a large portion of the area users.

All these places have clearly posted leash and litter rules for dogs. It is my impression that most of the "controversy, litigation, compromised visitor and employee safety? and resource degradation" of concern here is the result off-leash dogs, which is a violation of the current rules. I don't think any additional rules are required, and the problems perceived could be solved simply by enforcing the current rules. I would prefer options A or E for Sweeney ridge, Mori Point, and Milagra Ridge.

-Ross Ellison

Correspondence ID: 1132 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 16:30:27

Correspondence Type: Web Form

Correspondence: please don't let the "Dog Mafia" bully your decisions. as a dog owner (2) and frequent fort funston user (non dog walking) i would personally prefer a NO OFF LEASH PERIOD! policy. since this is not going to happen i will go with preferred alternative "C".

Also i don't understand how so many people are allowed to run dog walking businesses on GGNRA lands. they are quite blatant about it, showing up in vans and trucks advertising their business. they then proceed to let 6-10 unruly dogs run amok, unable to possibly pick up all the feces left behind.

hopefully you can finally leash these people.

thank you mike quinn

Correspondence 1133 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,08,2011 17:01:53

Correspondence Type: Web Form

Type:

Correspondence: Unless they are on PRIVATE property, dogs should always be on a leash. That's the least dog owners can do to mitigate the otherwise unpleasant impact their animals cause to neighbors and the environment. Please INCREASE the leash requirements, don't be swayed by a few loud, self-serving dog owners. The public spaces are for the public, not unleashed animals.

Correspondence ID: 1134 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,08,2011 18:11:48

Correspondence Type: Web Form

Type:

Correspondence: Hello, although I live in Berkeley now, I've been to Fort Funston with my dog many times. The DEIS report accuses dogs of degrading the land and compacting the soil. (DEIS, p. xxi, p. 225) On our walks at Fort Funston, I have observed many other forms of recreation that "degrades" the soil: hikers, bikers, joggers, kite flyers, hang gliders, surfers, children rolling down dunes, horse back riders, and remote control car hobbyists. The DEIS report fails to show what soil degradation can be attributed to these activities as well as the effects of nature: wind, rain, ravens, raccoons, seismic activity, and burrowing animals. The restrictions which would confine off-leash dogs to a few acres is overly severe unless restrictions were placed on everything that affects the environment, and then only in proportion to the extent of the effect. Dogs should not be singled out as the only cause of soil degradation. The document should be revised to provide scientific evidence that shows the impact of all the contributors of soil degradation and the percentage of impact each contributor is responsible for. Until that time, I strongly oppose any change in the leash laws at Fort Funston.

Correspondence ID: 1135 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,08,2011 18:16:25

Correspondence Type: Web Form

Type:

Correspondence: Some areas, the areas deemed to required the most protection, should be off limits for dogs. Some with dog on-leash and some off-leash areas with dogs under command. The environment and people should be protected from unsocialized dogs and dog waste. People need to be responsible for the acts of their animals. Please please enforce the regulations. Enforcement is key. Taking an animal on public land is a privilege, not a right.

Correspondence ID: 1136 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,08,2011 18:27:59

Correspondence Type: Web Form

Type:

Correspondence: I support the plan. We take our dog to Crissey Field, and see too many dog-walkers with too many dogs off-leash on the beach. I have been knocked down by off-leash dogs, and so avoid the beach area. The park is for all, not the commercial dog-walkers.

Correspondence ID: 1137 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,08,2011 18:40:47

Correspondence Type: Web Form

Type:

Correspondence: Since I live in San Francisco I will address the preferred alternatives for this area. While I can appreciate and understand striving to maintain balance between varying visitor interests and land/wildlife maintenance and preservation, complete or drastic removal of off-leash privileges is cause for concern in an urban area where there are so many people with dogs yet very few homes with large back yards for exercise.

In San Francisco, the preferred alternatives for Crissy Field and Ocean Beach seem balanced leaving a good amount of accessible area for off leash enjoyment. However, these alternatives are still removing quite a bit of off leash access.

Add the above to the preferred alternative for Baker Beach that removes all off leash access and the percentage of overall off-leash areas becomes even more significantly reduced. Why not keep at least half of Baker Beach off-leash to help balance the closing of other areas in San Francisco?

And the upper area of Fort Funston, one of the most utilized spaces, would be severely reduced. The climb up and down to the beach area is steep. What about the elderly and disabled with dogs to exercise? Or families with small children and dogs? Not to mention the wind can be rather brutal right off the parking lot.

In San Francisco, the cumulative effect of the current preferred alternatives would bring a drastic reduction in the percentage of overall off leash areas leading to over-crowding of remaining off leash areas and an increase in the risk of dog related issues and injuries. Please reconsider, especially at Baker Beach and Fort Funston.

Below are some other ideas for help with land preservation without the complete shut-down of areas:

1.) License or use fees for dog walkers/more than 3 dogs contributing funds for maintenance/preservation 2.) Use fee per dog for certain areas contributing funds for maintenance/preservation 3.) Temporarily closing sections for maintenance, re-growth, etc.; Shifting land use to help preservation

Thank you for your consideration. I look forward to seeing more balanced alternatives and perhaps ideas other than shut-down as the proposal is refined. We love both our pets and parks in San Francisco and want to keep them happy and healthy!

Correspondence ID: 1138 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 19:28:02
Correspondence Type: Web Form
Correspondence: I have read the plan in depth and wish to convey my support for the plan to manage dogs in the GGNRA. I have extensive experience with dogs and also with wildlife and resource management. While dog walking is a very popular activity in the Bay Area, we should not sacrifice natural resources to provide off-leash recreation everywhere. I understand the need to balance recreation with restoration, and I feel that this plan provides a sufficient balance in terms of off-leash space.

I also understand the desire for dog guardians to give their dogs "freedom". However, that freedom should not come at the expense of plovers, plants, or the experiences of other visitors. Where the freedom of companion animals begins to usurp the freedom of wild things is a tricky intersection that most would rather avoid. I appreciate the GGNRA's attention to this matter and hope you hold your ground and adopt, then enforce your plan.

Correspondence ID: 1139 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 19:34:33
Correspondence Type: Web Form
Correspondence: March 7, 2011

Dear Mister Frank Dean,

I'm writing you this letter urging the GGNRA to amend the proposed plans and to provide more off-lead recreation areas for dogs and their owners, open new lands to dog walking and take a more commonsense approach to enforcement without enforcing the law against everyone , because of a small minority that are irresponsible pet owners.

We must Also encourage responsible guardianship of our environment and I know that we can protect endangered species and habitat by educating park users & enforcing laws in sectioned off habitat areas without the need to section -off even smaller portions of the parks just for dogs.

I have learned that for over thirty years, the current Pet Policy has served the park, its users and the environment well. The GGNRA remains one of the best-preserved and much-beloved collections of open spaces in a major urban area. We readily accept that this plan should evolve over time to adapt to a changing population, After reading the proposed plan it is clear that the GGNRA's proposal represents a major departure from the current successful model and is overly-restrictive to dogs and their owners!

We should be seeking ways to make the San Francisco Bay Area friendlier to dogs and their owners. It is my strong opinion which is one of many thousands of people living in the bay area let alone the city of San Francisco who agree that the GGNRA's proposal is a step backwards for animal and public welfare in the Bay Area.

Regards,

Doyle McCullar

San Francisco, CA 94117

Correspondence ID: 1140 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 19:57:52
Correspondence Type: Web Form
Correspondence: Please do not stop the off leash area at Fort Funston and Ocean. Dogs need to run.

This has been a historic use of an URBAN park. Dogs are many peoples best and only friends.

Keep off leash.

Correspondence ID: 1141 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 19:58:18
Correspondence Type: Web Form
Correspondence: I am 67 years old. For the last 40 plus years I have been walking my dogs off leash in various park areas. As the years go by, fewer and fewer park areas have become available to me and my dog and for so many other of my

friends and neighbors. I've watched them ban dogs from areas yet allow horses which I've never quite understood. My dogs stay on trails and with me and provide an infinite amount of satisfaction and companionship. They teach children and adults about the love and care of animals, they bring us all closer to what life is all about. I truely hope that the final decision will be to allow dogs off leash in some of the last remaining areas that are available. I feel sad that there is a possiblity that my grandchildren will not have the opportunity to run with their dog off leash on the beach, or to hike the many trails available in the bay area as my children did. It would be a great loss for all of us.

Correspondence ID: 1142 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 20:50:49
Correspondence Type: Web Form
Correspondence: I live all the way down in Mountain View where there are no real places to take my 2 well behaved dogs for long walks off leash. I dive all the way up to the city several times a week to let my pooches run free in GGNRA. I often make a whole day of the trip, spending time (and money) in the city. Please preserve this unique experience for my family. We love living near such a wonderful place and such a fabulous community of both pet owners and people who love the outdoors. This is a one of a kind experience that is akin to an endangered species in this area.

Correspondence ID: 1143 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 21:51:50
Correspondence Type: Web Form
Correspondence: March 07, 2011

Frank Dean General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Mr. Dean,

The Draft Plan/Draft Environmental Impact Statement (Plan/DEIS) for Dog Management in GGNRA, which evaluates the impacts of six alternatives (A ? E and the preferred alternative) for dog management in 21 areas of GGNRA unfairly discriminates against people who exercise with their dogs and none of these proposals are acceptable. The only reasonable step is to maintain the 1979 Pet policy as it stands now.

The natural beauty and splendor of the GGNRA is unique to the San Francisco Bay Area. Holding these areas as protected for recreation is very

important for wildlife, residents and visitors. The present use does not conflict as shown by the E.I.R. This region has been diversely used by many entities over the generations; the most impactful of these has certainly been the United States Military particularly in building fortifications and roads. Despite all of these changes, the beauty persists and nature even reclaims much of the landscape.

People with dogs who frequent Baker Beach, Fort Funston and Crissy Field Beaches when I am there are diligent and self policing as to correct behavior and waste collection; as such these places are left cleaner than they were found. Responsibly exercising dogs is certainly the best use of recreation areas I can imagine. Please leave it this way.

Some visitors and policy makers object to the presence of dogs in parks, on trails and beaches. I do not feel these objections are well founded. As a society, we must not suspend the free rights of the many for the misbehavior of the few. There are policies already in place to deal with problems. The argument that dogs are in conflict with nature is unsupportable. Places where bank swallows are nesting and dogs have been banned appear to have no better swallow density afterward. If the argument is that the domestic dog is not natural in these areas, I respond: humans, in present numbers, are unnatural to these areas.

Please suspend further action on this matter and leave everything as it stands.

Correspondence ID: 1144 **Project:** 11759 **Document:** 38106

Received: Mar,08,2011 22:08:16

Correspondence Type: Web Form

Correspondence: The document's purpose is to prove why dog walking should be restricted, rather than an unbiased examination of the needs of both sides. In other words, someone wanted dog walking to be restricted, and gave a directive to write up a proposal to do so, ignoring other courts' decisions.

There is no evidence given as to how these beaches have deteriorated over the past 20 years, only how they may deteriorate over the next 20 years. Further, on Baker Beach for example, soil and vegetation are behind a blocked off area. Dogs are allowed off-leash on beaches, where there is sand. There is no soil disruption if there does not exist soil. Why block off-leash dogs on sand, then? This doesn't seem to make sense.

Dog owners and walkers are responsible persons. Would there be increased alcohol consumption or drug use at these beaches by persons who do not need to be responsible (since they are not with dogs) and conscious of their

surroundings? Would these people go to the bathroom in vegetative areas?

The proposal removes off-leash dog walking on all governed beaches. Why do this in a recession when people, who cannot find work, need things to keep up their spirits? The function of government should be to work towards the betterment of its people. This proposal benefits visitors, not residents.

One could solve the problem by charging people to walk their dogs off-leash. The money created would help off-set the alleged environmental impacts.

Do not do this. Breaking people's spirits during these tough times is not the right decision.

Correspondence ID: 1145 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 22:34:20
Correspondence Type: Web Form
Correspondence: March 8, 2011

Sir or Madam:

I am writing to support the new policy to restrict off-leash dog walking. The behavior of dogs at GGNRA beaches is not only disruptive to the enjoyment of the area but is also threatening and potentially hazardous to people, especially children.

I have visited GGNRA beaches regularly for the past thirty-two years. Since the birth of my children, I have been particularly aware of the problems dogs pose to other beach users. When my children were infants, they were routinely bothered, terrorized, or knocked down by a dog chasing a ball thrown by its master or by a pack of out-of-control, "happy" dogs playing. This is not a live and let live situation - there are victims here. I grew tired of having to console my crying daughter after she was chased and/or knocked over by a dog at the beach. If, after each such incident, I had a dollar for every time a dog owner said that their dog was friendly and loved children, I would be a very rich man.

I think that dogs should be banned from the GGNRA beach areas or be required to be on a leash. There are hundreds of acres in the nearby parklands for dogs to run free. Unrestricted off-leash dog access to the beaches is unacceptable due to the disruption and hazard it poses to individual users (especially children) of these natural areas.

Very truly yours,

Harold A. Ball Mill Valley, CA 94941

Correspondence ID: 1146 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 22:57:37
Correspondence Type: Web Form
Correspondence: The No Action alternative should be selected.

Proper enforcement of existing requirements for dogs to be under voice command would eliminate all the purported significant impacts associated with existing policies without significantly reducing the recreational value of the GGNRA areas in question by unduly restricting opportunities for off-leash dog walks.

The GGNRA is set within the larger San Francisco Bay Area community, and the values of that community should be given due deference when establishing park policies. The emotional and physical health-related benefits of dog ownership are well-documented, but dogs require areas where they can run free (subject to voice control) in order to be healthy and happy. GGNRA units are among precious few areas in this larger community where that is still possible. Providing off-leash access to scenic areas, subject to voice control requirements, is one of the key benefits currently provided by the GGNRA and withholding that benefit now will significantly impact this community.

I am a land use lawyer and often hear communities or individuals complain that government agencies and their NEPA and CEQA analyses tend to value "bugs and bunnies" over human beings. In many cases, the "impacts" to humans of concern are more imagined than real, and the impacts to protected species and other environmental resources are serious. In this case, however, it is the environmental impacts that are overstated. In fact, those impacts can easily be mitigated through measures far less harmful to the community than the proposed restrictions on off-leash use of GGNRA units. By contrast, the impacts of the proposed changes to the daily life and emotional health and well-being of Bay Area residents and their pets are real and significant.

The NPS was established in large part to provide citizens in the communities in which its parks exist with opportunities for recreational, scenic, and natural enjoyment. In this community, thousands of dog owners will be deprived of such opportunities should the proposed changes be adopted. The purported environmental benefits of the change, by contrast, are speculative and slight, and can be mitigated to less-than-significant

levels by other means such as enforcement of existing voice control requirements.

My wife Laura Bremer and I respectfully urge you to adopt the No Action alternative, and preserve some of the last remaining opportunities in this community for dog owners to responsibly care for their beloved companions.

Correspondence ID: 1147 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 00:25:07

Correspondence Type: Web Form

Correspondence: The proposal to greatly reduce the already greatly-reduced off-leash areas available to dog owners is misguided and discriminatory. There is so little land available for these activities, and the areas currently available are ideal, but limited. If there is a sense of over-crowding, that is because the need is great and the available areas so limited. So many people own dogs in these crowded urban areas, and they need places to let te dogs run, for their health and well-being. If you take away more than half of the available areas, as is proposed, it will be devastating, and cause even more crowding. In addition, some of the best areas are slated for removal, such as Crissy Field East Beach. I don't think the people drafting this proposal really understand the needs of dog owners, and over-compensate to protecting wildlife or other assets, but don't account for the fact that there are already so few areas available for these activities.

Enough is enough! Save what little we have!! This is a terrible plan, and grossly unfair to a significant segment of the community. We will really hate you if you go ahead with this plan.

Correspondence ID: 1148 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 01:12:49

Correspondence Type: Web Form

Correspondence: Read the article in the Chronicle about yesterday's meeting at Fort Mason where "hundreds" of mad dog owners showed up to protest the new proposed dog restrictions. I can only imagine how terrifying it must be to meet that group. So I am inspired to write to support your efforts. I hope that there will be a successful conclusion that protects the GGNRA from the increasing presence of unleashed dogs and the damage they do to the flora and fauna. I love dogs too but there can just be tooooo many. There ought to be licensing for professional dog walkers and limits to how many can be in one group. Many people who are quiet about this hope that the dog people don't cause the GGNRA proposals to collapse.

Correspondence ID: 1149 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,09,2011 01:40:43

Correspondence Type: Web Form

Type:

Correspondence: To Whom It May Concern:

I take the prospect of losing off-leash privileges very seriously. I am an active person and I have an active dog; it brings me a great deal of joy to be able to run around without a leash at such nice parks like Crissy Field. There are already so many non-dog areas in the city, must they ALL be governed by leash laws? I understand the concern for insisting owners use leashes, but living in an urban area can limit dog-friendly activities. Where are we supposed to go? My dog is happy to walk on a leash, but he also really likes chasing a ball. Can't we do both? Why is this such a big deal?

As a 27 year old male, I feel like more than a third of my income is taken for taxes. At the end of the day I am sure the National Park Service is not responsible or to blame for this, but it still reflects this underlying resentment that I feel like I still have to pay into a system that is of less and less value to my needs. People need a place to take their dogs. San Francisco is a beautiful city, and I can't help but wonder why this is all of a sudden an issue.

Please do not impose stricter leash laws on dog owners.

Thank you, Rory Mauro

Correspondence ID: 1150 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,09,2011 07:59:25

Correspondence Type: Web Form

Type:

Correspondence: I have Diabetes and walking improves my health. I take my dogs to Fort Funston and allow them to play with other dogs while I walk briskly for my health. Having the dogs off leash allows me to get a brisk workout. It brings me great pleasure to see my dogs interacting with the other dogs. When dogs are on leash, they naturally act more aggressively toward each other because they can't negotiate in their natural way. This is the best part of my day because it's so beautiful there at the shore. I would be dismayed if this was taken from me. This ability figured into my decision to live in the Bay Area. I support many , pet related, businesses including pet supply stores, veterinarianians, groomers...at one time... dog walkers....so...my pets and I contribute to local economies.

Correspondence ID: 1151 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 08:01:09

Correspondence Type: Web Form

Correspondence: While dogs are an important part of our families and communities, there needs to be balance between unrestricted access that negatively impacts wildlife and a total ban that completely restricts dog access. It's also important that whatever systems are set up are enforced. All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.

Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules.

The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. The goal should be 100% compliance with leash and voice control requirements.

Correspondence ID: 1152 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 08:01:52

Correspondence Type: Web Form

Correspondence: I can't open up the section on the Marin Headlands and I would, as a dog owner who loves those trails still available, would like to know what's happening in my "back yard."

I have been a charter member and contributor to the GGNPRA for years and value places where my dog and I can go together. Dogs are a valuable, nay, an invaluable part of owners' lives and contribute to their health (lower blood pressure, fewer heart attacks) and well-being (lower stress levels). It seems to me that it would be better to punish bad dog owners than to ban all dogs. To be able to romp unleashed in these beautiful hills is a great joy and to go alone would be a great sadness and I probably would not. I am growing elderly and I feel safer with my dog as well.

The great stretch of beach along the Pacific Ocean in Carmel, California is a great example of a place open to dogs off leash. One of the cleanest beaches around and lots of happy well behaved dogs and owners. I think we need similar places here.

Can you send me a printed copy of the section on the Marin Headlands? I

have an Apple computer and usually have no problem opening PDF files.
Thank you.

Margaret Harrington, M.D. Mill Valley, CA

Correspondence ID: 1153 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 08:44:25

Correspondence Type: Web Form

Correspondence: The open space should be open to everyone.

Not allowing dog owners to walk on these lands will significantly reduce the use of the open lands, in the long run this will lead to reduced support for open space.

Please open more paths to dogs, do not reduce our access

Correspondence ID: 1154 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 09:25:11

Correspondence Type: Web Form

Correspondence: Dear GGNRA People, Public lands are just that, public. It's up to the citizens to decide how such lands should and could be used. The Bay Area is home to thousands upon thousands of dogs. These animals need space to run, play and be free; to just be dogs. Part of the reason that many people adopt dogs into their family is because they enjoy being outside with their companion animals. Without some public lands being open to off-leash dogs, these vital parts of our families cannot be free to play the their DNA dictates. It would be like only allowing children to play indoors. Please listen to the throngs of people in the Bay Area who have, for decades, responsibly enjoyed these public lands, and keep them open to our companion animals. Sincerely, Russell Tenofsky

Correspondence ID: 1155 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 09:33:30

Correspondence Type: Web Form

Correspondence: I have been walking dogs off-leash at Fort Funston on almost a daily basis for the past 10 plus years - my personal dogs, rescued foster dogs, and client dogs as a professional dog walker. The ability to do so makes me a better caretaker of my own dogs, helps make them calmer and better behaved canine citizens. They are healthy, well-socialized and well-mannered. Over the countless hours spent at Fort Funston, I have had or witnessed issues or

problems only a handful of times. The vast majority of time I am there I see a harmonious situation and strong community. I bring every out-of town visitor to there and they all spend their time with huge smiles on their faces and are shocked and impressed by all the happy dogs running free and enjoying their exercise. Fort Funston as it stands now is a treasure. If we lose it, I can not imagine being able to continue to live in this city with my dogs.

I do not take my dogs to fenced-in dog play areas. My dogs find them stressful and I see more problems in those areas than I have ever seen at Fort Funston. I strongly believe that is what would happen at Fort Funston as well if the dogs are forced to stay in smaller, confined spaces.

Correspondence ID: 1156 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 09:59:36

Correspondence Type: Web Form

Correspondence: We have occasion to be at beaches, both at GGNRA and elsewhere, and observe people and their dogs. Some owners are responsible, some dogs are well-behaved. However, we've seen some terribly irresponsible behavior by owners, and unfortunately they ruin it for everyone.

We've seen an off-leash dog chasing an injured bird while the owners laughed, off-leash dogs attack on-leash dogs, off-leash dogs run up to people and terrify them -- the owners say "oh they're not dangerous" but when you don't know the dog and it's not under control why wouldn't someone be scared? Not to mention dog poop. If more people cleaned up after their dogs there would be a lot less anti-dog people. Most people want to go to the beach or out into nature to get away from the stresses of urban living -- and then you end up with it all over your shoe.

We are dog lovers/owners ourselves, and we would never take our dog on a public beach unleashed. We see absolutely nothing wrong with the GGNRA plan to require dogs to be on leashes on the beaches and in GGNRA. The fact that some areas will still allow off-leash dogs is, quite frankly, generous to dog owners.

Correspondence ID: 1157 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 10:15:25

Correspondence Type: Web Form

Correspondence: In my almost 3 years of hiking on these trails daily with my canine companion I have only come across kind, respectful and happy dogs and owners alike. These trails that we are talking about are essential for many of

us to feel whole and healthy. Not only humans need this daily recharge the trails offer, dogs do too. To be a well balanced dog one must allow for time off leash not only play (many dog breeds don't fetch and play) but space to use their nose the way they were intended to do. My dog has on a few occasions been my protector and alarmed me at such early stat that I myself could never have known that we were up against Mountain Lions. She just stopped, locked at me and turned around to go back home. Thats how we live in harmony...Pet protects her human, and wildlife goes on with there day in their territory. We live in a community were a vast number of dogs have been rescued this is a wonderful example of the coexisting mentality we have here in Marin County. And that is why may of us has moved from afar places to settle here in Marin. We care for each other we respect all life alike and we continue to teach our children to do so as well. I like to see that this beautiful and humble way of being will survive here in our beautiful heaven we have created for ourselves. MY DOG AND I WOULD LIKE TO SEE THAT THE EXCISING RULES TODAY WILL NOT CHANGE!

Correspondence ID: 1158 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 10:20:18
Correspondence Type: Web Form
Correspondence: Please keep dogs out of this area.

Correspondence ID: 1159 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 10:20:36
Correspondence Type: Web Form

Correspondence: The GGNRA contributes to the enjoyment of the citizens of the SF Bay Area and to visitors from all over the world. I visit GGNRA nealry everyday. It is crucial that GGNRA be protected from dogs because they make it difficuly =t for other users to enjoy these areas. Conflicts with digs happen everyday and are counter-productive to the goals fo the GGNRA.

I understand the goals of this study are to:

? provide a clear, enforceable policy to determine the manner and extent of dog walking in appropriate areas of the park;

? promote the preservation and protection of natural and cultural resources and natural processes;

? provide a variety of visitor experiences, improve visitor and employee safety, and reduce user conflicts; and

? maintain park resources and values for future generations.

I have comments on these items.

1) While dog owners are a vocal group, those of us who try to enjoy these areas without dogs and without being attacked by dogs feel like we can only carefully voice our opinions. Many dog owners are very hostile regarding this issue. Therefore I have only used my initials

2) Many dog owners are irresponsible when walking their dogs. They suggest that their dogs are under voice control while they are scratching my wife's legs for example. They say they are watching their dogs, but in the meantime their dog(s) are chasing the birds on the Beach.

3) Many dog owners allow their dogs to poop in the sand on Ocean Beach, making it difficult for others to enjoy. Dogs poop all over the trails making enjoyment of a routine walk on any of the trails less likely

4) 15 years ago I used to walk with my family at Fort Funston, but I feel that it is not safe and frankly it has become quite disgusting with all of the dog poop and dogs off leash all over the place. This is simply an area that I can no longer enjoy visiting. Perhaps this should just be turned over to the dogs because in effect it already has been.

5) I do still visit Ocean Beach, but I have to be very careful when visiting with my family because there are so many dogs running wild on the beach. Dogs seem to get quite excited on the beach and engage in much roughhousing with other off-leash dogs. Dogs should be required to be on leash at Ocean Beach to protect the birds and to allow others to enjoy the area.

6) I frequently visit Crissy Field Wildlife Protection Area, but have had several unpleasant encounters with dogs and dog owners so now limit my visits to very early in the morning when it is less crowded. I strongly recommend rules requiring that dogs be on leash or banned completely from Crissy Field Wildlife Protection Area. Dogs frequently jump on strangers trying to enjoy that area, they run wild on the beaches, they climb through or jump over the fences and dig up the new plantings, and they chase birds. Crissy Field Wildlife Protection Area is at risk for being over-taken by dogs like has happened at Fort Funston. The most important parts that need to be protected are the walking paths and the beaches. These areas are used heavily and are not conducive to dogs off leash. Protecting Crissy Field Wildlife Protection Area from dogs is critical to the success of GGNRA. Letting dogs run off leash harms the ability of users to enjoy GGNRA.

7) I frequently go to Lands End and Sutro heights park. These too are areas that are not well-suited to off-leash dogs. Other users and migrating birds need to be protected from off-leash dogs.

8) Mori Point also needs rules banning dogs or requiring dogs to be on-leash. Dogs routinely chase migrating birds and shore birds on the beach and along the trails above the newly constructed stairs. On many occasions I've seen dogs digging up the wildflowers out on the point above the stairs at Mori Point.

Please please please do what you can to protect these areas for the enjoyment of everyone currently trying to visit GGNRA. In most of these areas dogs off-leash are a serious impediment to others trying to enjoy GGNRA. In order for the GGNRA to remain enjoyable for future generations, we need to be sure that migrating birds and shore birds continue to visit and thrive in these areas. That can't happen when these birds are constantly being chased by dogs. WE also need to protect the fragile plants in many of these areas (Crissy Field, Lands End and Mori Point in particular) from being killed by dogs peeing and pooping on them and from dogs that dig up these plants.

Thank you, VM

Correspondence ID: 1160 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 10:35:48

Correspondence Type: Web Form

Correspondence: I live in SF and try to enjoy GGNRA weekly, but it has become more difficult with the proliferation of off-leash dogs at Crissy Field, Ocean Beach and Lands End. I have been attacked by dogs on numerous occasions. Last month I was yelled at by a dog owner after her dog attacked me. She told me that I must have food in my pockets. This is ridiculous. It has become so contentious on these walks that people definitely have a harder time enjoying these areas than they used to. last week I watched in horror as a dog owner allowed his large on-leash dog dig a 2 foot deep by 1 foot wide hole in one of the man-made grass-covered fenced-off dunes at Crissy Field. The dog must've been searching for a ground squirrel or something like that. But the dog was so big and strong, that the owner couldn't control him. The biggest problem is that owners can't control dogs that are off-leash, but some can't even control them when they are on-leash.

Do what you can to protect GGNRA for the enjoyment of users today and in the future. The issue of dogs has become a huge problem and is seriously impacting GGNRA in a negative way.

Thank you.

Correspondence ID: 1161 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 10:55:01

Correspondence Web Form

Type:

Correspondence: San Francisco has the highest pet per household ratio of any city in the US! People need dogs for health and stability, and dogs need a place to walk and run. Dogs will not go away - we need a management plan that acknowledges the number and the needs of our dogs.

Allowing dogs only in the most populated area of ocean beach, that is between gate 21 and the cliff house, will push the dogs and the people who don't like them together. This seems an obvious mistake. The dogs are as much a reality of city life as the people - we need a realistic management plan that allows areas for dogs to run free, areas where people who don't have dogs are less likely to go. Areas that allow dogs on leash are also needed, though it makes more sense to combine these with populated areas such as ocean beach near the cliff house and muir beach.

As I am sure you all know, the City was assured that dogs would have use of the beach when they turned the property over to the GGNRA, so all of this is in violation of that agreement. We have already made changes to accomodate the snowy plover, which is now recovering, so these changes cannot be justified on that basis.

We are only 4 people here, with 1 dog, but we will be highly impacted by these changes. We have many friends and neighbors with dogs. Again, dogs are here in high numbers, and must be reasonably accommodated!

Currently we walk our dog on leash at ocean beach and muir beach and rodeo beach. To have all these places removed is intolerable. Funston is already overcrowded and smells of dog poop because so many dogs go there. This plan will force many dogs into the City parks which are already over-used.

Why is this issue such a blind spot for GGNRA management? Please please open your eyes, realize that dogs will not go away. Please do not make the problems worse! This document needs revision; our dogs need more space, and more kinds of spaces, than this plan currently allows. Please reconsider. Thank you!

Correspondence ID: 1162 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 11:04:06

Correspondence Web Form

Type:

Correspondence: To whom it May Concern:

I have lived in Mill Valley all my life (40+ yrs) and have enjoyed the wonderful time of hiking with my canine companion(s). I have had several over the time. We have enjoyed playing at Muir Beach and Hiking Oakwood Valley Trail, Alta, Miwok and Mt. Tam. All of which have been a source of joy for me as well as my dogs. Given that we do not have a huge back yard to romp in the ability to run and stretch their legs. My dogs have protected me when a predator has been near - ie mt. lion, coyotes and bobcats...all of which I have encountered. To a point where they will just stop dead in their tracks and make me go back. Dogs require the ability to stretch and romp and use their noses the way God intended them to do as well as being a hiking companion for me. There are not that many locations where I can bring my dog to enjoy the outdoors without multitude of restrictions or not at all. Over the course of my time of using the trails, I have come across only respectful and courteous dog owners and people alike all enjoying nature harmoniously. I understand that Parks and Rec would like to alter the current Dog rules, and I respectfully request that they be left the way they are currently. These locations are part of many daily routine. Mostly from walking out my door down tennessee valley through Oakwood Valley up to the pond and then alta to the cemetary loop which brings me back to my house. It is a wonderful 1 hour loop which I and many others enjoy with our dogs and to restrict it in any way would be truly a detriment to all. This is the reason why we live here- to enjoy our hiking trails in peace and harmony.

Respectfully,

Alex Rodriguez

| | | | |
|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 1163 | Project: 11759 | Document: 38106 |
| Received: | Mar,09,2011 11:30:03 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I request that Off Lease areas in Fort Funston and Crissy Field remain available to all responsible dog owners and dog walkers. I do understand restricting the number of dogs one person may bring at a time although I have not experienced any problem when I bring my dog to those areas for walks. I am not familiar with the other areas that are up for review, but if their utilization is similar to Fort Funston and Crissy I would support fellow dog owners in their bid to keep these areas off leash. We all understand that overpopulation of people as well as dogs is taking a huge toll on our environment, but snowmobiles in Yellowstone, ATV's in desert areas, guns and hunting in National Parks seems to me to be greater threats to native flora & fauna. | | |

Correspondence ID: 1164 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 11:37:11

Correspondence Type: Web Form

Correspondence: I am in support of the proposed GGNRA Dog Management Plan. I am home owner near Lands End. As both a runner and parent to a young child, I have had many concerns over the years regarding dog areas, and I'm happy to see a new plan that takes into account all types of San Francisco residents, not just dog owners. I was attacked and bitten by a dog when I was a child, so this issue is very poignant to be. I do not like the fact that I cannot truly enjoy beautiful areas of San Francisco because they are run rampant with dogs.

I frequent Lands End, Sutro Heights, and Ocean Beach on a nearly daily basis. I've been chased multiple times while the owner stands idly by - even though the dog is supposed to be under voice control doesn't mean the owner or dog will obey. My two-year-old son has been chased multiple times while playing in Sutro Heights while the dogs owners are chatting with friends 50 meters away. These are just a few examples.

Another very upsetting point is regarding Fort Funston. The place is completely taken over by dogs - not just a single owner with a dog or two, but dog walking "services" with 5-10 dogs each. I decided to go running on the trails there a few weeks ago and couldn't take more than a dozen steps without being surrounded by dogs. It looked like a kennel and was just a complete waste of a beautiful property. I had to turn around and leave. I won't be going back there, or even recommending it to friends, until something is done.

I sincerely hope the Dog Management Plan moves forward so San Francisco residents can enjoy land that has since been taken over by dogs.

Thanks for reading,

Joe G.

Correspondence ID: 1165 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 12:38:33

Correspondence Type: Web Form

Correspondence: I fully support adopting NPS leash regulation (Alternative B) outlined in GGNRA's Draft Dog Management Plan.

As a long-time dog lover and dog owner, I avoid GGNRA off-leash areas,

partly because of the obvious degradation to the landscape wrought by dogs and their less-than-attentive owners, but mostly because I am sick and tired of dealing with people who don't have their dogs under control.

It is not cruelty to walk a dog on a leash or to train it to be a good citizen, and it is not the responsibility of the NPS to maintain its parks for the convenience of dog owners who are too lazy to go on a real walk with their leashed dog or train it to always come when called.

I know my dog trainer will not be happy with me, but I say a three-dog-per-walker maximum in GGNRA areas is more than reasonable. The City and County of San Francisco maintains plenty of off-leash dog play areas. Dog walkers and owners who want to let their poochies romp "free" can take them there.

Don't let lazy dog owners and dog walkers get you down! You have the full support of many dog lovers in San Francisco and Marin County!

Correspondence ID: 1166 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 13:05:53
Correspondence Type: Web Form
Correspondence: I have lived in San francisco for years and have observed the destruction of parks by dogs. I love land end but it is now ruined due to dogs. Not only is nature being destroyed but I can no longer go there due to off leash dogs and rude dog owners. I don't even go to on leash areas of the ggnra because the sounds of dogs barking ruins nature for me. I don't think dogs should be allowed in national parks or in nature in general. Definitely no off leash dogs and no on leash dogs would be ideal. You can walk a dog anywhere. You don't have to destroy nature to walk a dog.

Correspondence ID: 1167 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 13:05:58
Correspondence Type: Web Form
Correspondence: GGNRA, first off, thank you for overseeing the public beach area near our home for the last 40 years. As a homeowner (1478 43rd Ave) and business owner in the city of San Francisco, the rules regarding the enjoyment of our local beaches with our pet are VERY important to me. I have two Beagles that I walk to Ocean Beach nearly every day. I understand the need to protect our beaches, but we need to do so without destroying the inherent value of the land for the local population. The number one reason I bought an extremely expensive home in The Sunset, was to be able to enjoy my family, including my dogs, at the beach. Please don't apply restrictions that

will destroy my lifestyle.

I would ask you to take a step back and understand that the GGNRA is the most visited National Park land in the united states for a reason - because it is located in an Urban center. This land is not Yosemite, or Yellowstone - land we have intelligently protected as a living museum, but land sanctioned for use by the population. I make a request that you not only disengage future plans, but actually reverse any leash laws you currently have in place.

What the rule makers are missing is the reality of the situation. There are responsible pet owners and there are irresponsible pet owners, just as with anything else. With the current leash laws, I always leash my dogs in leash areas, but irresponsible owners do not. Do you know what it is like to walk dogs on a leash with other dogs running free, it is maddening to the owners and dogs alike.

There are more dogs than school age children in the city of San Francisco. The rules don't hurt the dogs they hurt the people who own the dogs. As a pet owner, I can only go where my dogs go - can you imagine the number of dogs that will be in the few off leash ares that would be left after your plan? The area of Kelly's Cove will smell of urine, just as all of the small fenced in Dog Parks in the city do.

There has got to be a way we can protect the lifestyle of all living things in the area without limiting the use of the land with leash laws. After the recent debacle with the Sloat shoreline, please take this issue more seriously. The future of OUR beaches depend on it.

Best,

Tom Jagger SF, CA 94122

Correspondence ID: 1168 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 13:19:10
Correspondence Type: Web Form
Correspondence: Re: Sweeney Ridge Trail

I was alarmed to see that the Golden Gate National Recreation service has proposed making Sweeney Ridge in San Mateo County a dog-free trail. I moved to Pacifica six months ago in part to take advantage of the natural beauty of the San Mateo coast. I naturally started exploring the hiking trails in the area and was particularly impressed by the beauty of the Sweeney Ridge trail which I was so pleased to be able to enjoy with my dogs.

I have been on the Sweeney Ridge trail a number of times since, mainly on the weekends and holidays. I rarely encounter other hikers. Many, probably a majority, of those I see hiking also are in the company of their dogs. Such is also the case for virtually all of the inland trails I have traversed in my 20+ years living in the bay area.

I cannot understand the motivation of the park service. Sweeney Ridge is all shrub and brush. The trail is wide and well maintained. It is clearly infrequently used. Many of those who do use it appear to be conscientious dog owners who keep their dogs on leash and on the trail (and since there is no water or other dog diversions up there, dogs have little inclination to leave the trail anyway - most dogs like being with their owners).

I seriously doubt that the parks people have studied the trail's use. If they had, they would know what I know from my months of walking it: cutting dogs off from this trail will reduce its use by humans to even lower levels (dog owners do not typically go on walks without their dogs). This will in turn further erode public support for federal and state parks at a time when the parks are already struggling for a share of government spending.

The biologists who work up these proposals are, to put it politely, working in an ivory tower. Yes, the wildlife would perhaps do better without any dogs in evidence on Sweeney Ridge. But the same goes for removing people from the park scene. Truly sensitive areas should not have trails through them. Once you build a trail and have to pay for its maintenance and operation, you have determined that the benefits of use outweigh the costs. When dog owners walk, they walk with their dogs - if their dogs aren't welcome they will not come, and they will resent the heck out of the agency that is keeping them out. The benefits of keeping dogs out of places like Sweeney Ridge are, I would suggest, more theoretical than demonstrable. Places like Sweeney Ridge may get so little use if dogs are excluded that there will remain no justification for the costs of keeping them open to the public at all.

As all studies show, dogs ownership encourages people to get out in nature. If we want to take proper care of our dogs, we have to ensure they get exercise. Many of us get our own exercise as a result of the obligation we feel to get our dogs exercise. We enjoy knowing we are helping our dogs and this goes a long way toward motivating us to help ourselves stay physically active.

Much of the trail use in the bay area is therefore directly attributable to dog ownership. Cutting out dogs may strike some in the park service as an unalloyed good. But they are dealing with a fantasy world, based on an ideal they conjure up from within their ivory towers. The reality is that the public's use of these trails will markedly decrease if the CGNRA proposal is

enacted.

I do not pretend to speak for all lands under the CGNRA. It may be that some parcels of land would actually benefit from reduced or eliminated dog access. However, the draft dog management plan proposes across-the-board cutbacks in dog access to virtually all CGNRA land. This approach to dog management seriously undermines the individual findings contained in the report. In other words, CGNRA greatly loses credibility when it makes the same recommendation for so many parcels of land that are clearly so different from one another.

Very truly yours, Jonathan Lipsky

Correspondence ID: 1169 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 13:33:47

Correspondence Type: Web Form

Correspondence: Thank for this work. It is long overdue. Dogs are not inherently bad. However, the GGRNA, and the Ocean Beach - Fort Funston areas in particular are adversely degraded by the sheer number of dogs whose owners insist on using these fragile beaches as a dog park. Just yesterday while coming out of the water from surfing I witnessed a woman watch her dog defecate in the shallow water and then just walk away. It happens all the time, virtually everyday. This is middle of the beach, where we have snowy plovers and where dogs are SUPPOSED to be on leashes. As someone who uses the middle of Ocean Beach virtually everyday, I can assure that dogs are rarely leashed.

Similarly, most dog owners have no idea their dogs chase endangered plovers because they never actually see the chase since the dogs are generally far off ahead of them. When confronted, dog owners are generally not reasonable or educated about the rules, instead they yell obscenities and get aggressive with anyone who doesn't allow their dogs complete freedom to roam.

I personally have seen dogs run up and pee on innocent bystanders - children even - who just happen to be sitting on the beach.

Worst of all by far is the dramatic proliferation of professional dog walkers using Ocean Beach and Fort Funston as a free, publicly subsidized dog run for their private profit gain. Two weeks ago I was surrounded at Fort Funston by over 30 wild, unleashed dogs. Two women were sunning themselves about 100 yards away. I was physically attacked by a foaming, vicious dog. I picked up a stick to defend myself. Suddenly one of the

woman ran screaming at me to get off the beach and go somewhere else.

What is happening in the GGNRA is horrible. Unruly dog owners have virtually taken over the beach for single purpose tax subsidized uses, and the beach is disgusting and dirty. Wild animals and non-dog business operators feel as though we've been kicked off the beach.

We look forward to reasonable limits being placed upon dog owners so that the public and wildlife may once again enjoy the beach and public property.

Correspondence ID: 1170 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 13:54:38
Correspondence Type: Web Form
Correspondence: I am opposed to dogs being allowed at all. I hike the Sweeny ridge trail a couple of times a week Dogs are rarely on leashes and most of the time owners don't have leashes with them. Owners don't pickup after their dogs like they are suppose to. I go to areas in the Golden Gate recreation area the beauty and quiet. I don't get that having to listen to dogs barking and charging walkers. Dodging dog droppings aren't enjoyable either.

Correspondence ID: 1171 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 14:57:02
Correspondence Type: Web Form
Correspondence: I'm writing to ask you to continue to allow dogs to be off leash at the GGNRA parks. It's difficult for humans to live in a city without access to parks and greenery, and it's also the same for dogs. My dog is very well behaved, under voice command and enjoys socializing with other dogs at the parks. It's especially important for dogs to have access to socialize with both people and other dogs to be well-behaved and well-rounded. It's especially difficult for many residents of San Francisco who do not have access to backyards to have a place where their dogs can run off leash and get well needed emotional and physical exercise.

If the national park system is for the enjoyment of all, then we should all be able to find a way to enjoy the parks together. Dog owners and non-dog owners alike.

Correspondence ID: 1172 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 15:06:37
Correspondence Type: Web Form

Correspondence: Funston is the best outlet for dogs to socialize & run free, not just a fenced off, dirt area. With this plan in effect, dogs are jailed within their leashes. This is not ideal for dogs and their loving owners.

Correspondence ID: 1173 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 15:33:03

Correspondence Type: Web Form

Correspondence: I would like to comment and hopefully get you to reconsider the plan

1. I do not walk my dog, I walk myself and my dog joins me as a valued member of my family. The thought of me standing around watching my dog play is not recreation for me. I am a 66 year old senior and walk 40 minutes with my dog at fort funston. So I challenge dog walking. It is recreation for people with dogs who in my view are an underserved community.

My dog is my child and I need a place to exercise along WITH my dog and the form of exercise I choose is walking. So I want you to reconsider the dog area and allow me to walk as I do now...down the paved path with my dog.

I also agree that dog walkers who do this for a living are out of control and i agree with your 3 dogs (maybe 4 or 5) but the number of dogs right now are too many per person. Plus they drag their leashes all over the property. If you solve this problem dogs will be much less of an issue for you.

2. I would like to see how big the universe of people with dogs are....bet it is bigger than people with bikes and maybe even people with children.

Thanks

Correspondence ID: 1174 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 15:37:06

Correspondence Type: Web Form

Correspondence: While I understand and am in favor of rules/restrictions for each individual area, I am not in favor of a "no dog policy". I am an avid hiker, nature lover, environmentalist to the best of my ability and rabid DOG LOVER. We have a dog that we are lucky to take just about anywhere we go. While she is fun loving and adores roaming freely, she is very much under voice control and leashed when necessary.

To be completely dog restricted in these beautiful hiking/walking/beach areas we have available would not only be a sad burden for our pooch, but

for myself and my husband as well.

Unfortunately, there are always some bad apples that destroy the enjoyment of us all but frankly including the park service, I believe dog owners need to police themselves and other dog owners! It's not just our dog we need to be aware of but everyone else's too. That's part of being a responsible dog owner.

Additionally, the SINGLE MOST threat to any ecosystem, open space preserve, nature preserve, and over environmental impact is simply: HUMANS. It is irresponsible people that bring trash, unauthorized bikes and motor vehicles, unauthorized tramping around off trail, etc. to these areas. Furthermore, what about the animals that live in the wild already? Do they not, also, have some (if not a BIG) impact on some environments as well? Should we propose carting all the deer, rabbits, racoons, skunks, bobcats, etc., etc., etc. away to an exiled island? Certainly not! There has got to be a middle ground that we can all work with.

I am most in favor of the LEAST dog restrictive areas but at a minimum would consider the status quo and/or some additional dog restrictions on the most fragile of areas only.

Thank you.

Carrie Hout

Correspondence ID: 1175 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 15:38:13

Correspondence Type: Web Form

Correspondence: I believe responsible pet owners should have the right to access the GGNRA without additional restrictions. There are plenty of laws on the books now to discourage bad pet owner behavior--we do not need more. The NPS should be focusing on more important issues such as illegal hazardous waste dumping in parks rather than wasting my tax dollars with this nonsense. Perhaps a drastic reduction of staffing would help the NPS focus on the important issues than layers of regulation which duplicate existing laww. Go attack a real problem--and make sure we taxpayers get some real value out of your overfunded pensions.

Michael Warsinske

Correspondence ID: 1176 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 15:50:10

Correspondence Web Form

Type:

Correspondence: My wife and I purchaed a Beagle last year and are pretty new dog owners compared to many. However, it does not take long to undestand the value and necessity of having urban areas where dogs can play off leash. Most urban dogs have been socialized over the early months of their puppihood and are well behaved in dog parks and beach areas. Those dogs that are not socially behaved are soon scorned and the dogs are removed quickly. To remove access to dogs to run freely would be against everything San Francisco represents: Free speech, open arms to diversity, and a general care for living beings. Please support keeping beaches and dog parks open to dogs.

Thank you,

PKx

Correspondence 1177 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,09,2011 15:51:47

Correspondence Web Form

Type:

Correspondence: The areas in question are State of County or City owned, correct? The State parks were set aside for protection. To allow dogs off leash seems to counter act that protection. I love dogs, I'm a "free spirit" in many ways BUT how dogs came to be allowed to chase birds, dig into protected ground, bushes, sand, etc., escapes me entirely. Then there is dog poop. Dog owners in general are sloppy about picking up their dog's poop, except when over seen at dog parks. A dog off lease would be impossible to pick up after. Sorry for the dog owners, they need to use a dog park that is destrpoyed by the activities of dogs running all over. People bring their children to parks, dogs are often not careful, they jump on people, some time they instill fear by their behavior. There is no sane solution other than requiring dogs to be on leash in parks. Our Parks should be protected. Please set in place the Resolution proposed. Vennie Yancy

Correspondence 1178 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,09,2011 16:01:20

Correspondence Web Form

Type:

Correspondence: Misbahaving dogs should never be allowed but most dogs in dog appropriate areas are happy and more healthy because they have had a chance to run. I have not seen a problem with dogs on Crissy Field and think they should be allowed.

Correspondence ID: 1179 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 16:01:37
Correspondence Type: Web Form
Correspondence: Parks are not for dogs off leash. Very few would pick up after or care. Just let them run free. They are domesticated animals and need to be controlled.

Correspondence ID: 1180 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 16:10:42
Correspondence Type: Web Form
Correspondence: To Whom It May Concern:

While I'm fortunate enough to have a small dog that can be exercised around my neighborhood, I don't feel that there are sufficient dog parks in my city. Sure, there are limited dog runs, but there are RARELY any dogs there because the areas are so small and not conducive to dogs socializing and getting the much-needed exercise on a daily basis. Going to a place like Fort Funston gives my dog the opportunity to play freely, meet other dogs, socialize and get her exercise while walking with me. It's a place where many friends meet on a regular basis (both humans and dogs).

While I agree that some dogs and their respective owners need to have better control, regulations should be implemented to penalize the violators, not the entire dog population. Most people who take the time to bring their dogs to an off-leash area love their animals and do their part to maintain the property and surroundings. Most dogs aren't a threat to the environment and other people so please reconsider the penalties and limitations these new regulations will bring.

Sincerely,

Rita P

Correspondence ID: 1181 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 17:00:06
Correspondence Type: Web Form
Correspondence: As time has passed GGNRA has become more and more restrictive to off-leash dog access, yet dog ownership in the city has increased- leaving us with fewer and fewer places to exercise our dogs, and ourselves. As a huge supporter of environmental sustainability, I understand the importance of preserving natural spaces and protecting endangered animals. However, we

must find ways to use our open spaces in a way that benefits all species, including humans and dogs. We have an obesity crisis in this country, and our health clinics are overflowing with people suffering from chronic diseases, many of which are caused by excessive weight. We should be doing whatever we can to make exercise an easy part of every day life. People often care more about their pets than they do their own health, and they will get up and walk for the sake of their pet. We should have places where people can walk or run for miles with their pets to improve their health, rather than forcing pet owners into neighborhood parks with no room to run for any distance. While the plight of the snowy plover may be dire- so is the plight of the health of San Franciscans. An investment of political will now could potentially save our city millions in future healthcare costs.

Correspondence ID: 1182 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 18:44:08

Correspondence Type: Web Form

Correspondence: I am commenting specifically on Crissy Field and Fort Point in the GGNRA, where I walk everyday. I support the GGNRA plan as outlined on the map. It is very important to have dogs on a leash on all sidewalks and paths. I have been knocked to the ground by a rambunctious dog once and on several occasions have had dogs jump on me with dirty paws, leaving dirt on my clothes. Dogs off leash frighten little children, and for those small children who are learning to ride their little bikes at Crissy, dogs running around them often scare them and cause them to fall off their bikes. Even adult bikers are often chased by dogs and get in accidents trying to avoid them. Dogs should be on a leash on all the beaches at Crissy Field and Fort Point area since the birds can be anywhere along the shore there. I have seen too many dogs chase the gulls, sparrows, and blackbirds while their owners look on. They also chase the Great Blue Heron and Great Egret which are often on the grass hunting for the little rodents on the airfield area. The dogs should be completely banned from the area where the snowy plovers are. Despite the signage there, I still see dogs off leash on that part of the beach.

When the dog leash policy is finalized and put into regulation, it must be enforced with stiff fines for ignoring the leash rules. Otherwise, dog owners will continue to be oblivious to the wildlife. There also needs to be much more signage re need to keep a dog on a leash.

Correspondence ID: 1183 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 19:58:19

Correspondence Type: Web Form

Correspondence: please stand firm on leash laws and restrictions on loose dogs in all GGNRA areas. dogs running loose damage wildlife habitat as well as the flora and fauna in those areas. there is no reason for dogs to be allowed to run loose. consider enclosed and/or restricted areas when feasible. those of us who walk our dogs on leash, walk alone or ride horseback are tired of having to deal with out of control dogs running up to us.

Correspondence ID: 1184 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 20:19:00

Correspondence Type: Web Form

Correspondence: I am an amateur bird watcher. I do not have a dog. And I support allowing dogs to have off-leash areas. I believe that if you post signs saying "Caution: Dogs Cannot Chase Wildlife or the Off Leash Status Will Be Revoked". Peer pressure will be far more effective than issuing tickets to stop errant behavior.

Having numerous off-leash areas for dog recreation is important for both humans and dogs. Both get to socialize and exercise in a healthy manner. At off-leash areas it is remarkable on how fit both the dogs and the owners are at all ages. Please do not let a few sour grapes ruin the passion of so many.

Currently 29% of homes have a dog. Many of these people vote and are politically active.

One day I hope to have a dog again. It would be very sad for me not to be able to enjoy the wonderful outings off-leash. Currently, I get to visit the dogs off-leash which has brought me great joy as I bird watch. There is plenty of room for birds and well behaved dogs. 97% of the dogs are very well behaved. I won't venture a guess on the percentage of well behaved humans.

Correspondence ID: 1185 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 20:30:56

Correspondence Type: Web Form

Correspondence: I have provided written comments at the informational meeting in Pacifica on March 9 and also provided comments to your paid consultant at that same meeting. However, I wish to make three additional comments. (I have been walking my dogs at Fort Funston for 21 years.)

After reviewing all of your proposed plans for Fort Funston, enforceability is a major issue. Having said that, I would suggest an easier plan to enforce - use the parking lot as a dividing line. Limit, not only off leash walking, but

dogs altogether in all areas south of the parking lot, leaving all areas north of the parking lot to off leash dog walking. Families who wish to picnic and enjoy the beach could do so without dogs. It is much easier to access the beach down the stairs than to access the beach through the paths at the north end of Funston. Remember, you have no restrooms other than those in the parking lot. Families walking their children down to the beach via the north end of Funston discover no restrooms. We all know what happens then.

In reviewing all of your proposed plans for Funston, "C" seeming to be that plan to which the GGNRA is leaning, there is an accessibility issue for handicapped individuals and individuals with mobility problems. Proposed Plan C's off lease area is all sand, which is not compact and is slopped on the east side making it impossible for access for handicapped individuals and individuals with mobility problems.

My third point is that making the area at the north water fountain an on leash area would only encourage dogs to be more aggressive when vying for a spot at the water dishes. Dogs are known to be much more defensive and aggressive, when on leash.

Correspondence ID: 1186 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 21:08:30

Correspondence Type: Web Form

Correspondence: Banning dogs from Ocean Beach is unrealistic and will only cause more problems. You will be punishing the people who use the beach the most. Sure, thousands of people use the beach on a sunny day, but who is out there when its raining, and windy? Dogs. Just people with their dogs, not bothering anyone. I the aim is to prevent litter and protect birds, why not ban picnics? Plastic kills far more birds than pet dogs do. If people want peace and quiet, you really should ban children and teenagers from the beach, anyone can tell you they make a lot more noise than the dogs do. If the dogs digging is the problem, you better ban sandcastles. too. If you succeed in banning dogs on Ocean Beach, I will ignore the law. So will most people. If you are going to give me a ticket for walking my dog on a public beach next to my house, I am not going to bother leashing him, since you are going to give me a ticket anyway. I will still clean up after my dog, because I care about my beach. Like a lot of dog owners, I pick up trash on the beach when I'm out walking my dog. My guess that we probably pick up more trash than we leave as a whole. When I see another dog owner not cleaning up after their dog, I speak to them. I don't like dog waste and litter on the beach either. I love my beach. I love my dog. I'm not giving up either without a fight.

Correspondence 1187 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,09,2011 21:14:10

Correspondence Web Form

Type:

Correspondence: People who own dogs regard them as members of their family. There are many people for whom their dogs are their only family members. When people go to the beach, they like to bring their family members with them. It would be discriminatory to prevent access to the beach to family members who, through no fault of their own, happen to have four legs and bark. I thought our society was moving toward a greater appreciation for diversity, but you want to take us backward toward intolerance. Dogs have a greater need for recreation and exercise than do most humans. These needs are well met by water access, as evidenced by the thousands of dogs who use the Bay at Crissy beach and the ocean below Fort Funston. Because they cannot lobby your personally, because they don't know how to talk, are poor reasons to deprive dogs of the right to have their needs met, especially when they are harming no one and causing no trouble. I have been to Crissy beach so often that I know that any reported instances of problems caused by dogs, in comparison with the use of the beach by dogs, are statistically insignificant. The only place dogs can be adequately exercised is in a public venue. While you are planning to severely restrict off-leash public access, bear in mind that at least 40% of American households include dogs. (NBC Nightly News referenced a survey that determined that as many as 60% of American households have dogs.) Dog-owning citizens are taxpayers, who pay your salaries. If you do not fairly represent us, you will be acting like Middle Eastern dictators. If the beaches are to remain usable for everyone, according to their needs, this means adequate off-leash areas for people with dogs. The current situation meets this criterion. Your plan is an outrage.

Correspondence 1188 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,09,2011 21:54:15

Correspondence Web Form

Type:

Correspondence: Thank you for the opportunity to comment on this document. I strongly support stronger management and control of dogs and other companion animals in the Golden Gate National Recreation Area. Dogs are certainly important parts of our families and communities, but they are only one part of the community and ecosystem that is the GGNRA. It is more than fair to require dog owners to accept certain limits for areas where their dogs may play when the survival and wellbeing of so much wildlife and so many plants are at stake.

I have two general comments on the proposal.

1. Off-leash dog areas should be fenced for the protection of both park

visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.

2. Leash and voice control requirements must be strictly enforced. Without strict enforcement, this effort is meaningless. In that vein, I believe the goal of achieving 75% compliance with the leash and voice control requirements is far too low. I would recommend a goal of 95% compliance with leash and voice control requirements.

I would also like to comment more specifically on some of the particular areas under discussion.

1. In Fort Mason, I support the preferred option, requiring leashes in all areas. 2. I strongly support the exclusion of dogs from Crissy Field. There have long been issues with dogs and the Western Snowy Plover habitat. 3. Similarly, I feel that dogs should be excluded from the Ocean Beach Snowy Plover protection area.

Thank you, Mimi Calter

Correspondence ID: 1189 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 22:21:53
Correspondence Type: Web Form
Correspondence: Hello; I have been attacked by off leash pit-bull dogs several times over the years. I strongly support the limitations proposed for off-leash dogs in GGNRA. Create one area where the dog owners and dogs can go exercise off-lease. Put them all in there so they can bite each other and leave the rest of the parks for people. People using parks should not have to simply accept the threat of attack from an unleashed dog. Thank you.

Correspondence ID: 1190 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 22:50:46
Correspondence Type: Web Form
Correspondence: We strongly support keeping Muir Beach open as a ROLA and the trails south of it (coastal and to Pirates Cove) for leash access. Accessible ROLAs are a required part of our Bay Area culture and lives. The vast majority of trails and areas in the RA are closed to dogs. Muir is a traditionally precious exception as a dog-friendly area for decades. We use it often--it is the closet beach for we Mill Valley folks, and unique in its character and beauty (including the trails). No-dog options are available at Stinson and Baker. Balancing multiple options is best served by keeping Muir open.

Correspondence ID: 1191 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 23:16:49

Correspondence Type: Web Form

Correspondence: Thank you for offering this chance to comment. I support the "preferred alternative." It appears to me that you have thought through these issues carefully and have attempted to balance the various needs. I have been a resident of San Francisco for many years and I've grown increasingly concerned about the number of dogs in our park lands. Some dog owners are respectful of the native plants and animals but others are not. The fact is, dogs are pets. They are not wild animals and should not have the right to degrade our natural environment. I do hope the preferred alternative is adopted as suggested. I will feel better that we are protecting our natural environment.

Correspondence ID: 1192 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 23:41:08

Correspondence Type: Web Form

Correspondence: Plan/DEIS provides for all its listed purposes. It provides a clear and (I hope) enforceable policy to determine the manner & extent of dog walking in GGNRA land. Dogs, unleashed or not, should be strictly controlled in the land entrusted to GGNRA. It serves your own goals of promoting the preservation & protection of natural features, to provide for visitors and employees, and maintain park land for future generations. To achieve all these goals dogs should be lawful, and according to GGNRA rules. Off leash dogs absolutely destroy the natural features GGNRA is mandated to maintain, for the reasons listed above.

Dog owners & friends love their pets more than they do any plants or animals, including other humans. It's natural that they would unite strongly for the greatest pleasure & convenience of their beloved dogs. They will fiercely demand the fullest extent of their dogs' pleasures. They must be resisted by GGNRA for all the good purposes you've defined, for the visitors who use park land for the many reasons other than to walk their dogs. Natural features such as plants & animals, historical natural features that the GGNRA is mandated to protect. Protect the land. You are not mandated to protect "dog rights". Jack L. Dodson

Correspondence ID: 1193 **Project:** 11759 **Document:** 38106

Received: Mar,09,2011 23:48:53

Correspondence Type: Web Form

Correspondence: In my experience at the beaches here, I see mostly unleashed dogs, so I support the new management mandates.

Correspondence ID: 1194 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 00:36:30

Correspondence Type: Web Form

Correspondence: As a dog-owning user of Fort Funston, Mori Point, and Rancho Corral de Tierra (soon to be part of the GGNRA), as well as a paraglider pilot flying in Fort Funston and Mori Point, I am very concerned about the proposed changes to dog access in GGNRA-managed lands.

I visit these lands on a near-daily basis, and it seems impossible to attribute environmental damage specifically to the presence of dogs. Horses, bicycles, and hikers all enjoy these lands, and also contribute to the environmental state of these areas.

I do not want us to lose these precious resources, but fencing everything off and preventing access is a bigger lose to the entire community - and the only way to "preserve" the land completely.

Given the preponderance of ice plant (a non-native invasive species), clearly there have been many changes from the pristine condition of the GGNRA land. The amount of debris between Fort Funston and Thornton Beach from the failed golf course is truly criminal.

People with their dogs along fully appreciate the beauty and bounty of these areas. We carry stinky poop to preserve the area (can you say the same for equestrians?). We tread lightly on the paths (unlike bikes and horses). We note the changes and needs of the area, and protect it as our own.

Please choose Alternative E and continue to provide as much access as possible.

Correspondence ID: 1195 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 09:52:38

Correspondence Type: Web Form

Correspondence: Has GGNRA ever considered having more park rangers patrol the park/land/beaches so that they can regulate the actions and activity going on? I have been a regular at Funston for the last 3 years and I have only seen a ranger out on the trails ONCE!!! Once in three years!! And that was only recently when SF Bomb squad had to detonate flares. Ranger was only out to block the road. I know they have their station and I see their trucks parked

there, but what do they do? Shouldn't they be patrolling the grounds to check on any unsafe activities.

I feel that instead of taking away the off leash dog walking area in Funston, to find other alternatives like better barriers, have the rangers patrolling the area and fine those who are breaking the rules! RESPONSIBLE dog owners do not like the IRRESPONSIBLE just as much as other people don't. Now if the park rangers were out patrolling, then we responsible dog owners would be able to point out any violators and the ranger can cite them! Money collected from citations can go into funding for GGNRA land upkeep and improvements.

There are other alternatives to make this work and keep a balance between dogs, land and people. Please do not take away or change this very RARE and SPECIAL place for dogs to run free and be happy. There is nowhere else in the Bay Area like it!

Correspondence ID: 1196 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 10:40:40

Correspondence Type: Web Form

Correspondence: My preference is to keep the dogs from having free range of the parks. The most important element is that the birds, animals and plants that are natural to the area, proliferate and are not disturbed.

I do think that people with dogs do not belong on the beaches. However, I can see some accommodation to having dogs on leash on some trail. Sadly, most dogs that I see on the trails are not on leash.

Thanks!

Marilyn Sugarman

Correspondence ID: 1197 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 10:50:00

Correspondence Type: Web Form

Correspondence: I oppose off-leash or "voice control" access in any of the areas. As an avid runner and hiker, I can testify that a dog under "voice control" is a myth. Once a dog decides to chase something--animal or human--the owner can scream as loud and as long as he or she is capable, and the vast majority of dogs will not respond. I have been jumped on, nearly tripped, nosed, and even nipped by dogs that were "under control." I cannot understand the argument that dogs must be allowed to race around off leash in order for the

dog and the owner to get some exercise. That is absurd. For all of the reasons that the document presents, including human safety, dog safety, and protection of the environment, I urge that only on-leash dogs be allowed in the fewest areas proposed. There are plenty of other areas in both counties where dogs can be walked on leash and some controlled areas where they can roam unleashed.

Correspondence ID: 1198 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 11:22:37

Correspondence Type: Web Form

Correspondence: Dear Stewards of the Land,

As a Dog owner and a lover of national parks I am distressed at this attempt to curtail off leash access at in the GGNRA.

While this may be an attempt to "preserve" the parks for future generations, I feel that it is in fact a denegration of the relationship that people might have with the land. By asking us to so extensively limit our use of the space you place further distance between the public and the land itself, making it a museum rather than a familiar back yard. Furthermore if the goal is simply to protect the wildlife contained wherein, I fear that this attempt will fail, as humans are an equally disturbing presence to dogs.

Please do not criminalize responsible dog owners-- there is a covenant between this city and her dog lovers. San Franciscans are among the most responsible citizens in the country and because of this I believe that education as to their dogs impact will go a long way to positively impacting delicate ecosystems without shunning these important and numerous members of society. Please reconsider the implementation of this plan, it will negatively impact the relationship of the people to the land forever.

Sincerely,

Emily

Correspondence ID: 1199 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 11:26:20

Correspondence Type: Web Form

Correspondence: We have been visiting Crissy Field for more than 10 years now with our dog, Xosa. It's a breath talking place and we feel so lucky to have it in our back yard. We usually go every Saturday morning and occasionally on a week day to walk on the beach and let our dog enjoy running around off

leash. This is the only place that's safe from traffic where he can roam around untethered. We love our neighborhood parks but they tend to be too crowded and fertilize the grass with fish emulsion, something that is quite tasty to dogs, but not good for them.

I can't guess the amount of trash we've picked up over the years, disposable diapers, plastic cups, soda bottles, cigarette butts as well as feces from neglectful dog owners. There will always be people who don't care or don't maintain these beautiful places. I'm not sure why dogs are singled out and not all people. If you want the place pristine, then no one should be allowed to visit, but if this park is for everyone then dogs should be allowed to stay, free and off leash, the same as all other visitors to the Crissy Field.

Thank you for keeping this a place for everyone and not singling out a small segment of the visiting population.

Leslie Ernst

Correspondence ID: 1200 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 12:01:02
Correspondence Type: Web Form
Correspondence: If the issue has become increased population and visitors to the GGNRA space and therefore crowding and safety concerns as well as habitat damage, then perhaps instead of closing off part of the 1% of land currently available to dogs, the GGNRA should increase the amount of land available to dogs. This would decrease the burden, both in terms of overcrowding and safety, and of habitat destruction of those few areas which are becoming more highly trafficked by dogs. As the population grows, as does the population with dogs, it does not make any sense to decrease the space availability. It either must stay the same and suffer from the increase in population, or expand. It seems that there is plenty of room in this instance to expand the space availability for dogs. The current proposal seems very backwards.

Thank you, Maral

Correspondence ID: 1201 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 12:18:09
Correspondence Type: Web Form
Correspondence: 5 Ways Pets Can Improve Your Health Can a "pet" prescription lower your blood pressure? Owning a pet can ward off depression, lower blood pressure, and boost immunity. It may even improve your social life.

By Jeanie Lerche Davis WebMD Feature Reviewed by Brunilda Nazario, MD

A pet is certainly a great friend. After a difficult day, pet owners quite literally feel the love. In fact, for nearly 25 years, research has shown that living with pets provides certain health benefits. Pets help lower blood pressure and lessen anxiety. They boost our immunity. They can even help you get dates. Allergy Fighters "The old thinking was that if your family had a pet, the children were more likely to become allergic to the pet. And if you came from an allergy-prone family, pets should be avoided," says researcher James E. Gern, MD, a pediatrician at the University of Wisconsin-Madison, in the *Journal of Allergy and Clinical Immunology*. However, a growing number of studies have suggested that kids growing up in a home with "furred animals" -- whether it's a pet cat or dog, or on a farm and exposed to large animals -- will have less risk of allergies and asthma, he tells WebMD. In one study, Gern analyzed the blood of babies immediately after birth and one year later. He was looking for evidence of an allergic reaction, immunity changes, and for reactions to bacteria in the environment. If a dog lived in the home, infants were less likely to show evidence of pet allergies -- 19% vs. 33%. They also were less likely to have eczema, a common allergy skin condition that causes red patches and itching. In addition, they had higher levels of some immune system chemicals -- a sign of stronger immune system activation. "Dogs are dirty animals, and this suggests that babies who have greater exposure to dirt and allergens have a stronger immune system," Gern says. Date Magnets Dogs are great for making love connections. Forget Internet matchmaking -- a dog is a natural conversation starter. This especially helps ease people out of social isolation or shyness, Nadine Kaslow, PhD, professor of psychiatry and behavioral sciences at Emory University in Atlanta, tells WebMD. "People ask about breed, they watch the dog's tricks," Kaslow says. "Sometimes the conversation stays at the 'dog level,' sometimes it becomes a real social interchange." Dogs for the Aged "Studies have shown that Alzheimer's patients have fewer anxious outbursts if there is an animal in the home," says Lynette Hart, PhD, associate professor at the University of California at Davis School of Veterinary Medicine. "Their caregivers also feel less burdened when there is a pet, particularly if it is a cat, which generally requires less care than a dog," says Hart. Walking a dog or just caring for a pet -- for elderly people who are able -- can provide exercise and companionship. One insurance company, Midland Life Insurance Company of Columbus, Ohio, asks clients over age 75 if they have a pet as part of their medical screening -- which often helps tip the scales in their favor. Pet owners with AIDS are far less likely to suffer from depression than those without pets. "The benefit is especially pronounced when people are strongly attached to their pets," says researcher Judith Siegel, PhD. In one study, stockbrokers with high blood pressure who adopted a cat or dog had lower blood pressure readings in

stressful situations than did people without pets. People in stress mode get into a "state of dis-ease," in which harmful chemicals like cortisol and norepinephrine can negatively affect the immune system, says Blair Justice, PhD, a psychology professor at the University of Texas School of Public Health and author of *Who Gets Sick: How Beliefs, Moods, and Thoughts Affect Your Health*. Studies show a link between these chemicals and plaque buildup in arteries, the red flag for heart disease, says Justice. Like any enjoyable activity, playing with a dog can elevate levels of serotonin and dopamine -- nerve transmitters that are known to have pleasurable and calming properties, he tells WebMD. "People take drugs like heroin and cocaine to raise serotonin and dopamine, but the healthy way to do it is to pet your dog, or hug your spouse, watch sunsets, or get around something beautiful in nature," says Justice, who recently hiked the Colorado Rockies with his wife and two dogs. Good for the Heart Heart attack patients who have pets survive longer than those without, according to several studies. Male pet owners have less sign of heart disease -- lower triglyceride and cholesterol levels -- than non-owners, researchers say.

Correspondence ID: 1202 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 12:33:58
Correspondence Type: Web Form
Correspondence: San Francisco residents have more dogs than children. We pay our share of tax for public schools, please let us continue to have the opportunity to play with our 'kids' off-leash. I'm looking at the proposed map of Chrissy Field--hundreds of dogs and their owners enjoy this beach every day. If this regulation is approved and we are only allowed a little strip of beach, it will be grossly congested and not enjoyable for anyone. Thank you for your consideration.

Correspondence ID: 1203 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 13:39:04
Correspondence Type: Web Form
Correspondence: Please consider the importance of the following points before considering the drastic measures in your drafted proposal.

1. The Health of our Elders: Fort Funston and other off-leash areas in the Bay Area has become a haven for older people to walk their dogs, socialize with other seniors, and form a community that makes their lives more fulfilling. The vitality of this community will be greatly diminished if your proposal goes into effect. People look out for each other and their pups. There is virtually no discord among the regular dog walkers. Their health and vitality is greatly increased as a result. If anything, off-leash dog

walking ought to be encouraged, especially for seniors, as a way to lead more healthy and fulfilling lives.

2. The Health of our Canine Friends: Dogs, especially in the City, absolutely need a place to playfully engage with each other and enhance their socialization skills. Dogs on leash are more aggressive than those off leash. On leash dogs cannot run, catch, play, scamper, visit each other in a healthy canine manner. They become frustrated; they bark; they have no way to expend the vast amount of energy that they generate. As a result of your proposed plan, dogs in the city and likely in suburban areas as well, are much more likely to be less than model citizens. Again, as above, older people (perhaps more than any other people) will be affected adversely by living with pups who no longer are calm, sated, attentive and well behaved. Older people simply cannot walk long enough to give their canine friends their due!

3. The Health of the Environment: Bringing (of all things) more horses onto the trails of Fort Funston, brings with it a population with a horrific sense of entitlement - and no sense of responsibility. The regular dog walkers of Ft Funston clean up after their animals not only on a daily basis but also on a monthly clean-up. Those who bring their horses up to Ft Funston 1) do not stay on the horse trails, 2) frequently do not know how to ride a horse, and have little control of their animals, 3) never clean up after their horses, and 4) leave trails more heavily eroded, more covered with manure, vermin and flies. Turning our trails into 'Horse Trails' makes both the official trails and the adjacent areas unfit, unsafe, and unsanitary for human walkers (with or without dogs). The horse riders have been by far the most inconsiderate and destructive population at Ft Funston.

I urge you to reconsider this proposal. I agree that setting standards and procedures for use of public spaces is important. But the drastic expansion of banned areas for off-leash walkers is punitive for the vast majority of citizens who use, love, respect, and protect these wondrous outdoor spaces. The unintended consequences of your proposal to both human and canine members of the community cannot be underestimated.

Correspondence ID: 1204 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 13:47:51

Correspondence Type: Web Form

Correspondence: I support the alternative that is most protective to the environment. This area should be maintained to preserve nature rather than being turned into a dog park. I have witnessed dogs going off trail and eating and digging up plants and chasing and injuring animals. I am particularly worried about the snowy plover. There are way too many dogs in this area. I think dogs should be

banned from this area. Making dogs on leash only doesn't work because people will just disobey that. They will put a leash on when they see a police officer/ranger but then will take it off once the officer has left the area. I have seen this numerous times and reminding them only seems to make them want to break the law more.

Correspondence ID: 1205 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 14:19:37

Correspondence Type: Web Form

Correspondence: Comments on the Fort Funston maps of proposed alternative plans.

Please consider that all but one of your alternate plans for Fort Funston discriminate against seniors walking the trails.

MAP 16: This proposal is the second most restrictive of those proposed. It is punitive to seniors in particular, who cannot navigate easily or regularly up and down the steep cliffs to the designated off-leash area below.

MAP 16A: The Voice Control alternative is by far the most reasonable and responsible of your plans. It makes it clear to all that open spaces are open only to those who have taken care to train their dogs as good neighbors and citizens. This plan is fair, even handed, and a good reminder that humans on the trails should always have their dogs under voice control.

MAP 16E: This plan is a poor second plan choice to 16A. Its advantage is that it allows a contiguous area for walkers. However, because of its reduced area, it is likely to be eroded quickly through over use. My greater concern is that this plan also discriminates against those seniors who cannot navigate the steep, deep sandy trails of the prescribed areas.

Of your plans, if changed must be made, Map 16A is a compromise alternative that is viable and fair to all. It is also the only plan that will work well for seniors.

Please take seriously the detrimental effects the more severe restrictions will have on the health and welfare of seniors who have so long diligently and reverentially cared for Fort Funston.

Correspondence ID: 1206 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 14:42:50

Correspondence Type: Web Form

Correspondence: Please, first of all, know that I am a (loving) dog-owner, that I have many

friends who are dog-owners and have no agenda here other than to convey some opinions which will probably not be welcomed by many fellow pet owners, however....I am entirely supportive of the proposed changes to the off-leash areas which GGNRA is considering. I have been increasingly offended and amazed by the lack of respect shown by many in SF concerning the responsibilities of dog-ownership. Living near Alta Plaza and Lafayette Park, I can not possibly walk my dog in the parks because they are taken over each day by packs of mostly large, off leash dogs. Many with walkers who are chatting or on cell phones, and not mindful of the fact that others should also be able to enjoy the parks. My dog is a rescue terrier who,even after 12 years of attempts to correct, is terrified of off-leash, large dogs. What do small dogs do when scared? Attack/bite usually. Not a nice picture.I have spoken at length to others who have this problem as well. When we first moved from East Bay to SF 6 years ago, I was delighted to find Crissy Field and walk him there, always on leash and mindful of the areas where a nod to leash laws was in place. I learned to avoid the beach area as well as the long field, as more and more dogs ran free. Rarely do I see owners cleaning up in the grassy areas. Nor at the beach near the Warming Hut, where children often play in the sand. I now feel comfortable in the Presidio only in Lucas' outdoor area where security guards insure that dogs are on-leash. It seems unfair to me that so many in SF feel free to ignore the rules--be it red lights, pets-on-leash areas or..I could go on too long here, that is not the point.There are many options still being left for dogowners who wish to let their animals run free--why can't we have a similar amount of space for those of us who prefer leashed areas? And I also have spoken to many volunteers in the replanting areas of Crissy as well as the Presidio. The off leash dogs wreak havoc on many native plantings and wildlife areas,and can frighten people out hiking who aren't expecting a loose dog at their heels when rounding a corner. Please consider that many of us feel over-powered by the off-leash voices, but that many of us with dogs, who walk them ourselves every day, welcome some reigning in of conditions and hope for enforcement of any changes. Thank you!

Correspondence ID: 1207 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 15:16:25

Correspondence Type: Web Form

Correspondence: My name is Danielle Satinover and I am a resident of San Francisco and a dog owner. I would like to voice my concern regarding the issues of park land and dog use. It is a vital part of not only my health but that of my dog and my son that we have space to walk with our dog off leash. For myself I have high blood pressure and my doctor has told me that a crucial part of maintaining my health is to walk vigorously and often. I am not very motivated on my own and this is a large part of my owning a dog which gets me out and moving. My dog is extremely well behaved and very active, (I

often take her to meet my toddlers at the child care coop in which I work as she is so gentle with the children and they love her). She loves to run and needs room to do so. I have tried taking her to the fenced in dog areas but there is not enough room in them for her to run freely and she always feels trapped by the fence and will act defensively because of it. This is never a problem in open off leash areas. Finally, my six year old son recently started a hiking club where he invites friends from school and weekly we go out for a hike somewhere in the city. He loves it and so do his friends. I am so happy that he is choosing a healthy active life style on his own. Part of the joy of these hikes for all the children who join us is our dog who has been made a member of the hiking club. She often leads the way and the children follow. Having her be able to run off leash makes these hikes fun for her and the children as they can all play together. I have to say there is nothing sweeter than seeing a boy and his dog run and play freely. As you can see having off leash areas for our family is vital to our maintaining a happy, healthy, life style for myself, my son, and our dog.

Thank You, Danielle Satinover San Francisco, CA 94124

Correspondence ID: 1208 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 16:28:02
Correspondence Type: Web Form
Correspondence: I am a member of the National Parks Conservation Association, and annual contributor. I frequently visit Yosemite, Yellowstone, the Grand Canyon, and GGNRA.

I totally oppose the proposed Dog Management Plan for GGNRA. GGNRA is an Urban park, not a wilderness area. Dogs are cultural and natural resources also--and need our protection. There are many more places throughout the Bay Area for humans to find recreation. We do not need to have the lands available for dog recreation and dog walking limited further.

Correspondence ID: 1209 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 16:39:44
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean,

On behalf of my husband,myself and our two dogs, I am writing to decry your current proposal to further limit off-leash dog areas. As long-time, responsible dog owners (almost every pair of slacks I own and several of the jackets too ALWAYS have a couple of plastic poop disposal bags in them), we are here to tell you that unless you are a triathlete, dogs cannot be

properly exercised on a leash! Surely you know the amount of sales tax revenue created by all the dog owners buying kibble, dog beds, treats, toys , flea and tick medicine; all the people employed in the dog grooming businesses, and the sale of licenses, just to list a few of the benefits the city receives from dog owners. There is also property taxes and the independent jobs created by dog walkers. We have driven over from Oakland just to walk our beautiful dogs @ Crissy Field and Muir Beach! PLEASE re think this plan. People who do not appreciate dogs have sooooo many other places to go, but there are few places dogs can frolic with other dogs and run full out. Remember, we are tax payers and voters too. And don't forget all the scientific evidence of the health benefits of dog ownership! They do so much to help mankind, sniffing for drugs and bombs, assisting the handicapped, and just providing love and companionship. Do not infringe on our ability to walk on a sandy beach and watch our canine companions enjoy running and swimming freely.
Sincerely, Cathy Broder

Correspondence ID: 1210 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 16:41:59

Correspondence Type: Web Form

Correspondence: I have lived in San Francisco continuously since 1972. My husband and I currently have a Jack Russell terrier that we walk each morning on Crissy Field. We tell our dog every morning how lucky he is to be able to use Crissy Field and we know how lucky we are to have Crissy Field and the whole GGNRA. It is a priceless resource for all of the citizens of this area. I understand the need for a dog policy that takes into account multiple uses and their environmental impact, but that also takes into account the many dogs in this area, who need reasonable access, both on leash and off leash in the GGNRA. I support responsible dog owner and commercial dog walker behavior. My husband and I are also members of GGNRA. With this in mind, I would like to make the following comments on the draft GGNRA Dog Management Plan:

Comment #1: Crissy Field, Airfield: Instead of Alternative C, which is too complicated and very difficult to enforce, you should select Alternative E, which allows dogs off leash on the whole airfield, except as dictated by special events. Trying to enforce C, would be extremely difficult and very management intensive.

Comment #2: If under this policy there will be no areas off leash in San Mateo County and fewer than at present in Marin County and San Francisco County, those areas that would still be off leash would be more heavily used than at present, causing control problems for both dog owners and GGNRA staff. Solution: Be certain that there are some off leash sites in all three

counties.

Comment #3: The draft does not address the possibility of time of day use in some areas. For example, it would be possible to have some sites open to off leash dog walking until 10 am. This would be much easier to enforce than some of the options offered in the draft.

Comment #4: Crissy Field, East Beach: All of the alternatives on Crissy Field beach use mention East Beach except Alternative C. As worded, I am left asking under this alternative would there be no dogs on East Beach, either on or off leash?

Comment #5: Compliance-Based Management Strategy: As described in the draft, it is unclear how GGNRA staff would be able to demonstrate with valid data that "compliance has fallen below 75 percent (measured as the percentage of total dogs/dog walkers observed during the previous 12 months not in compliance with the regulations. . .). This strategy has the potential to create a lot of law suits and acrimony between GGNRA staff and dog walkers.

Comment #6: There is no opportunity for an open hearing/meeting on this issue. Park users have been allowed to submit comments and to informational sessions, but not to have an open meeting.

Comment #7: Commercial dog walkers should be allowed. I strongly prefer Alternative E for dog walkers because it offers good, solid rules for what they can and cannot do and the rules are restrictive enough.

Comment #8: The report fails to address the urban nature of Crissy Field. Crissy Field is not a wilderness site. It is part of a large city with a lot of dogs.

Final comment: When I attended the public meeting at Ft. Mason on Monday, March 7, I was pleased to be able to chat with GGNRA staff. They were polite and helpful and the information there was helpful too, but there were a lot of people there who are not willing to compromise in order to make multiple use possible. I hope that the final policy is reasonable for all concerned.

Thank you for this opportunity to share my ideas.

Correspondence ID: 1211 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 16:45:47
Correspondence Type: Web Form

Correspondence: Just a quick 2 point followup regarding the New Lands alternative, specifically as it relates to Rancho Corral de Tierra on the San Mateo Coast. 1. I prefer Alternative E as it relates to Rancho - Most of the dog walkers use a small area immediately north of Montara and east of Hwy 1, approx 1 square mile or slightly less, as well as a small area in El Granada to the east of Coral Reef Ave. Such a small area of Rancho, as well as just a tiny percentage of the Bay Area GGNRA lands, that has been used for off-leash walking for decades, by me personally for 20 years. If we could at least keep these small areas to enjoy, as there are really no other areas on the San Mateo County Coastside. 2. In the last 2 years the local dog group has installed and maintained a half dozen small poop cans and bag receptacles, and the area is now much cleaner and healthier than it was - it is rare to see a dog owner not pick up after their pet now. Surely such responsible care deserves to be taken into consideration? Thank you.

Correspondence ID: 1212 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 16:57:18

Correspondence Type: Web Form

Correspondence: I have been reading about the Dog Management Plan and the controversies aired in the Mill Valley area. I live near Tennessee Valley and walk the Oakwood Valley several times a week, usually in the morning when the crowd of dog walkers are also on the trail. I'm not a dog owner, and I don't walk my cats on the Oakwood Valley Trail. My observation over the past few years is that the dog walkers are very respectful of and grateful for the dog rules and leash limits, and of course the trail draws dog owners who have well-trained dogs who behave themselves (or try to) when off leash. I enjoy greeting others on the trail, including the dogs who regularly sniff my hand to check me against their catalog of people scents, and to detect whether I might have a treat (which I never do).

The Oakwood Valley Trail is a short easy trail that is ideal for the "brisk 30-minute walk" recommended to people like me to keep in shape in our 70s, and the many dogs are an additional pleasure. With the exception of less skilled or responsible professional dog walkers who have too many dogs and limited voice control (who have virtually disappeared this past year after a series of complaints in Mill Valley parks the year before), I see no reason to change the off-leash rules for this trail. It is very rare to see any plant digging, or for dogs to roam much off the trail (except in the grassy winter marsh near Tennessee Valley Road). Oakwood valley is a valuable social site in southern Marin and should stay that way. I cannot speak to the issues of GGNRA trails in more remote areas. But Oakwood Valley Trail is at the edge of an urban area, even if it is in the GGNRA, and functions very well as a trail in that type of environment. It is a credit to the management of the GGNRA that they have explored new ways to be an integral part of an urban

environment while also protecting the park for the future.

Correspondence ID: 1213 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 17:53:22
Correspondence Type: Web Form
Correspondence: I am a user of Fort Funston, Mori Point, and Rancho Corral de Tierra (the area just north of Montara) and am requesting that you choose Alternative E.

Correspondence ID: 1214 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 18:21:33
Correspondence Type: Web Form
Correspondence: Of the multiple areas evaluated in this plan, I have only visited the Fort Funston area and I have visited Ft. Funston approximately 30 times over the past two years.

Use of any natural area by humans results in degradation of the resource, either by the direct impact of the human visitors or by intentional improvement of the area to improve access, parking, sanitation, and view shed, amongst other reasonable goals. Specifically, there are NO examples of ANY human visitation to ANY ecosystem that have not caused change and degradation of the native environment.

To resolve this dilemma, there are several conservation areas and a few government projects that exclude human visitation. Such restrictions have merit from a global conservation perspective, but little or no value from a local use and enjoyment perspective.

Next, if there is merit to enjoyment of park areas by humans, then concomitant degradation of the natural environment, however minor or major, must be accepted as a universal consequence of achieving this benefit. From a global use and enjoyment perspective, human visits to natural areas have merit, but human impact has a negative value from a local conservation perspective.

Confronted with this universal and axiomatic conflict of perspectives, organizations, such as the GGNRA, draw lines and create regulations which are theoretically based on many pages of documentation; in fact, they reflect a biased and unspoken, political objective.

If Fort Funston is 'suffering' under its current use, then it is suffering because of its success in drawing many people for many uses. From my

perspective: (1) Dogs get along with each other and with people better than people get along with each other: leashes or restricting dogs won't change that. (2) The vast majority of environmental impact at Fort Funston is from people walking (with or without dogs) over the dunes and down the cliff sides, not from dog paws or dogs digging. (3) Intentional projects at Funston (wastewater management, gun batteries, parking lots, roads, landing zones, etc), while well-intentioned, have done much greater damage to the environment than the absence of leash requirements. (4) The cliffs at Fort Funston (and in neighboring areas) are inherently unstable and will continue to erode with tectonic certainty, with or without dog leashes. (5) Fort Funston, because of the absence of leash requirements, is a HUGE success, drawing lots of people with their dogs to one of the few places both species can enjoy together. From both global conservation and global use and enjoyment perspectives, it makes much more sense to concentrate off-leash use (with its concomitant environmental impact) in one area, than to spread it out over a larger geographic footprint. The high utilization success of Ft Funston alone should convince you that the proper path is not to take away the basis of the success, but to make it a better, safer experience for dogs, owners, and dog walkers. Success deserves support: more planting should be initiated, focal sensitive zones should be fenced off, park workers should be educated to interact wisely with dogs and people, commercial dog walkers should be educated to be responsible, facilities should be improved, walking paths should be improved and expanded to keep humans off the dunes, beach access should be improved, and multi use should be encouraged. Signage could direct people seeking to avoid dogs to other areas and walks.

Fishermen deserve some water /beach access; hang gliders deserve landing areas; kite or model airplane fliers deserve air space; artists deserve view sheds; tourists deserve photo opportunities; businesses deserve business parks; the environment deserves protection; and dogs deserve an outside place off-leash. If there were not such a need, you would not have created a 2400 page document trying to prove that there is no need. Please think beyond a selective perspective or political agenda. There is a need for off-leash areas and such use should be supported at Fort Funston.

Correspondence ID: 1215 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 18:22:46

Correspondence Type: Web Form

Correspondence: I implore you to not make the proposed changes for dogs' sakes. They need the off-leash time and reclaiming so much land previously available would cause a tremendous hardship for many pups and their owners.

Please reconsider.

Correspondence ID: 1216 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,10,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: My wife and I strongly support the Dog Management Draft Plan. Our national parks' foremost mission is conservation and it is critical this is prioritized.

I believe:

- All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs. - There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time. - Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules. - The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

Correspondence ID: 1217 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,10,2011 19:39:08

Correspondence Type: Web Form

Type:

Correspondence: I am writing in very strong support of the Dog Management Draft Plan as it appropriately prioritizes conservation over dog owners.

I believe:

- All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs. - There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time. - Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules. - The goal of

achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

Correspondence ID: 1218 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 19:40:35

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean, I write you in strong support of the Dog Management Draft Plan. It is high time for action on this issue.

I believe: - All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs. - There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time. - Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules. - The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

Correspondence ID: 1219 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 19:42:23

Correspondence Type: Web Form

Correspondence: As a birder, I am deeply concerned about the snowy plover's future. We need to get dogs in check in sensitive parts of Golden Gate National Recreation Area.

I strongly support the Dog Management Draft Plan. O

I believe: - All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs. - There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at

one time. - Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules. - The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

Correspondence ID: 1220 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 19:43:43

Correspondence Type: Web Form

Correspondence:

I support the Dog Management Draft Plan. Our national parks' foremost mission is conservation and this Plan is in line with this.

I believe: - All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs. - There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time. - Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules. - The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

Correspondence ID: 1221 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 19:45:32

Correspondence Type: Web Form

Correspondence:

My husband and I are strongly supportive of the Dog Management Draft Plan.

We believe: - All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs. - There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at

one time. - Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules. - The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

Correspondence ID: 1222 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 21:23:03

Correspondence Type: Web Form

Type:

Correspondence: Dear Sirs,

Please place me on your emailing address.

We have a dog -- she loves the water and Crissy Field. However, I am also a parent.

My experience is that the dogs simply take over on the week-ends frightening small children, disturbing people on the beach, and people fail to clean up after their dogs ("she/he is just a small dog, I forgot a bag, etc."). So, I am sympathetic to the direction things are going. However, the restrictions go too far.

It seems to me I should be able to have my six year old and my child on the same beach near facilities for both of them. The big problem for us is access to the stream which runs from the lagoon to the Bay: Claire, the six year old, really likes to play there -- and so does the dog. There should some time during the week when when these are accessible to both -- without dog walkers, please.

My suggestions are:

-- Ease up the proposed restrictions during the week when families are less likely to be there.

-- Dog walkers are a real problem: the last time I was there three dog walkers accounted for 21 dogs. They tend to hang out and talk to one another so they are like a tornado running down the beach. Basically they are a commercial enterprise and should not be treated the same as an Owner with a dog or two walking on the beach.

-- Really tough enforcement of cleaning up the poop when it is in the sand.

-- If Central Beach is to be the main location then facilities for washing down the dog, bathrooms, etc. should be put into place -- when one's child wants to use a bathroom it is a long walk.

Respectfully,

Michael Austin

Correspondence ID: 1223 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 22:47:58
Correspondence Type: Web Form
Correspondence: According to the Humane Society of America, there are about 77.5 million dogs owned by citizens of the United States. We are tax payers and thus support the National Parks, Recreation Areas and other Federal lands. We deserve consideration of the needs for our pets. The least restrictive regulations, coupled with sanctions for violations, is the best policy. Dogs need areas to be off lead.

Correspondence ID: 1224 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 23:52:21
Correspondence Type: Web Form
Correspondence: When people ask us why we moved to San Francisco from the East coast ten years ago, we always say "We did it for the dog". The much higher cost of living was worth the dog friendliness alone. We have had many amazing days hiking and walking along the beach admiring the beautiful scenery and watching our dog frolic happily, wagging his tail and making new friends along the way, leash free. San Francisco has a wonderful and responsible dog community. We are passionate about our dogs and will fight for their rights, since they cannot speak for themselves. But as much energy as we spend protecting the welfare of our animals, we also put as much thought into who we vote for, where we spend our money and what organizations we support and donate to. There are more dogs than children in San Francisco, yet dogs only have the use of less than 1% of the GGNRA lands. It is extremely disappointing that the GGNRA now wants to restrict dog's use of these lands even further. In all my visits to Crissy Field and Fort Funston, mostly on busy weekends, I have never witnessed any tension or incidents between off leash dogs. I have only seen residents and visitors, with or without children, of all races, speaking all languages and of all sexual orientations, co-existing and often bonding over the one thing we have in common, our love for the innocence of dogs. The GGNRA's DEIS

Dog Plan is more than unfair to one of the largest populations in San Francisco and goes against what the GGNRA was supposedly created for. There will always be irresponsible dog owners just like there will always be criminals in this world. But you cannot punish everyone for the bad deeds of a few. I encourage the GGNRA to rewrite the dog management proposal by not viewing dogs as the enemy but keeping in mind their needs to socialize and exercise, just like everyone else's and how they have enriched the lives of the residents of San Francisco whose tolerance and understanding make it the best city in the nation.

Correspondence ID: 1225 **Project:** 11759 **Document:** 38106
Received: Mar,11,2011 11:29:34
Correspondence Type: Web Form
Correspondence: I hope that something other than the Preferred Alternative in the DEIS can be done to achieve the GGNRA's goals.

Correspondence ID: 1226 **Project:** 11759 **Document:** 38106
Received: Mar,11,2011 11:37:26
Correspondence Type: Web Form
Correspondence: The proposed changes to the current situation appears to be draconian at many sites. Many sites have few documented instances of citations or problems arising from dogs off leash (e.g. Muir Beach), yet the preferred alternative and the other alternatives all severely limit the amount and quality of space available for walking dogs off leash but under voice control.

Additionally, those people who live close by to a current off-leash site would have to drive substantially further in order to access the few remaining off-leash sites in the alternatives being proposed, thereby increasing gasoline consumption and need. This is the wrong direction for change in energy issues and makes us even more dependent on oil.

Correspondence ID: 1227 **Project:** 11759 **Document:** 38106
Received: Mar,11,2011 12:34:50
Correspondence Type: Web Form
Correspondence: Sirs, I am a forty year Marin resident and a member and donor to the California Parks Association. I have used Muir Beach regularly during that time. Since the 1980's I have walked my dog there. I did a recent 20 day survey to assess the use. Dog walkers represent greater than 70% of the use. On the usual cold windy day dog walkers represent 80 to 90% of the use. On the rare warm sunny day people bring their children and the dog walker

percentage drops to 50%.The people and children appear to enjoy the interaction.Dog walkers thus represent the majority of traditional users.Since this is a National Recreation Area,I feel the people should be allowed to keep their traditional use.I feel there are compromises that can protect the environment and use by the people.1.Walk dogs on leash only to the beach,dogs allowed only within 100 feet of ocean.2.Dogs allowed only before 10 A.M. and after 5 P.M.3. Dogs banned during Salmon spawning.4.Another solution devised by the Park Service. I realize any of these solutions may be more difficult to enforce but if it is clearly signed and there is a significant fine I feel the people will obey the rules. Sirs, please preseve the major use of this beach.

Hayden O. Evans, M.D.

Correspondence ID: 1228 **Project:** 11759 **Document:** 38106

Received: Mar,11,2011 12:45:49

Correspondence Type: Web Form

Type:

Correspondence: I am very discouraged to hear of the GGNRA plan's to revoke off-leash dog walking within the GGNRA. It has been a very special part of my life here to be able to take my dog on beautiful exercise runs in places like Fort Funston, Ocean Beach, and Chrissy Field, and it is part of what has made San Francisco a very special place for dog owners. The GGNRA is not a national park, it is rather a recreation area that must be able to accommodate the needs of the city's residents. Boo to you, GGNRA, for towing an official line that doesn't seem to be hurting anyone, and that brings great pleasure to a great many residents. If this happens, I will no longer hold the same respect that I have had in the past for the National Park Service.

Stuart McKee

Correspondence ID: 1229 **Project:** 11759 **Document:** 38106

Received: Mar,11,2011 14:38:19

Correspondence Type: Web Form

Type:

Correspondence: I found out about this from a friend and would like to see less off leash dog areas and enforcement of the leash and no dog areas. I was told that if I get bitten or in any way harmed by an off leash dog in an off leash park, most of the time the dog owner can get out of paying for my medical bills. This is completely unfair. This means that I can't go to off leash areas as I'm not willing to take this risk and I think if others knew about this, they wouldn't take the risk either. I also really want to know exactly where these areas are, so that I can avoid them in the future. I see off leash dogs everywhere right now, so I'm assuming the entire GGNRA is off leash at the moment. I

looked at the maps for the preferred alternative and the space for off leash dog walking seems ok. These are some of the nicest areas of San Francisco, but it looks like there will still be some nice areas that are not off leash. I'm annoyed that I won't be able to go to the off leash areas, but I'm ok with giving up access to that space (and no more) for the well-being of dogs.

Correspondence ID: 1230 **Project:** 11759 **Document:** 38106
Received: Mar,11,2011 14:40:12
Correspondence Type: Web Form
Correspondence: Frank Dean March 11, 2011 Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Dear GGNRA, The following letter represents my concerns with the new proposed Dog Management Plan issued by the GGNRA.

I have been a resident of San Francisco for over 14 years and I am currently a homeowner in the Outer Sunset Neighborhood. I consider myself an active concerned citizen with regards to our environment and especially towards the beautiful parks and reserves that make up the Bay Area. Typically I stand behind any movement to improve our open spaces and increase protection of such valued lands. Your current plan however for dog management has major flaws that I explicitly object to. I chose the area in which I live specifically because of the open areas allowed for off leash Dogs. Both Fort Funston and the already small areas of Ocean Beach are such valued treasures to my lifestyle as well as to my dogs lifestyle that if they did not exist I would seriously consider moving. The Bay Area's off leash dog parks and areas should be models for other cities to follow not ones to abolish. Why are you trying to take away such a cherished component of city living? In your messaging you state "Action is needed because under current conditions, park resources and values could be compromised to the extent that, without action, these resources and values in some areas of the park might not be available for enjoyment by future generations."

We have had a very effective plan that has enabled 30 years of enjoyment for generations of people, children, and dogs. Your proposed plan directly eliminates the enjoyment of these areas by future generations by disallowing them to go in them. Dogs contribute to a healthy lifestyle they inspire activity, community bonding and for many people are the only companions that exist. To take such a drastic measure and further reduce the already meager 1% of land available for off leash dog enjoyment is not only a lazy irresponsible measure its embarrassing. As a citizen of the Bay Area I am deeply disappointed that an organization such as yourselves who used to have my respect now holds my suspicion. What are the main motives of

your stubborn efforts to eliminate responsible off leash dog areas? Do you wish for more funds? Why not ask or propose a fund to compensate for the so called "reduced resources" that you state. As a dog owner I would pay for the use of the land for me and my dog if that is what things have come to. You also state " a dog management policy inconsistent with NPS regulations and increased public expectations for use of the park for dog recreation have resulted in controversy, litigation, and compromised visitor and employee safety, affecting visitor experience and resulting in resource degradation" Dogs are not causing these carefully worded statements. Poorly run governments with reduced funds are. Why not solve the homeless population problem or the cruising problem near the soccer fields of Golden Gate Park or the selling of drugs at the Ocean Beach Parking lot? I am afraid to go in these areas during daylight hours due to human activities and the dangerous element that they attract. I have never encountered these fears in any of the proposed areas of your plan and I am never afraid dog or no dog to walk in these areas. If I walk into an off leash dog area that is posted as such and I am afraid of dogs and I get bit then shame on me. I don't expect my local parks and recreations department to pay for any repercussions that may result from my presence in there. This is why we have a judicial system. Let it solve the problems of litigation and controversy. I do however expect you to police illegal activity, why stick with what is illegal already and leave dogs alone.

If there is truly an "environmental impact" that is caused by dogs I urge you to try to work with and come up with a fair solution between the group of people (the dog owners as well as the non dog owners) that you are so directly affecting with this poorly conceived overly restrictive plan.

Be an inclusive, reasonable, responsible organization not an oppressive, restrictive, arbitrary one. There are other issues you can solve and cause a direct benefits to your lands than by making it illegal to walk a dog off leash in an area that it's been legal to walk a dog in off leash for 30 years. Thank you for your time.

Regards, Heather DeLoughrey San Francisco, CA 94122

Correspondence ID: 1231 **Project:** 11759 **Document:** 38106
Received: Mar,11,2011 16:00:04
Correspondence Type: Web Form
Correspondence: I am against any changes to the present policy.

Correspondence ID: 1232 **Project:** 11759 **Document:** 38106
Received: Mar,11,2011 16:20:56
Correspondence Type: Web Form

Correspondence: I am a native San Franciscan. I raised my daughter here, in North Beach, and currently help to raise my 3 and 5 year old granddaughters here in the same neighborhood. And, I have always been a pet owner. I have enjoyed the beaches and parks extensively, raising my daughter on them after school and on weekends. Crissy Field has for decades been a destination of ours, as it continues to be today. For children the beach is peaceful and safe, and is the only beach venue in San Francisco that children can stand in the water without fear of treacherous waves and undertow. However, our 'enjoyment' has been diminished by the population of dogs on the paths and on the beaches. Commercial dog walking--which has become a most lucrative venture at around \$20 an hour per dog -- has impeded our family's ability to enjoy our public space. Some walkers are 'in charge' of 10-11 dogs, who are off leash and galloping along madly, easily able to tackle and topple little kids. My granddaughters are fearful of the large packs of dogs, and the dogs sense their fear and then the dog panic becomes contagious; dogs growl and are poised to attack. Having to navigate this potentially dangerous situation is stressful and frankly, very upsetting. A further concern for health and safety is the urine and feces that is halfheartedly picked up. Understandable, because how can one walker meticulously clean up after 10 dogs, no matter how conscientious? [even if they are making \$200 an hour.] Management of this situation is absolutely crucial. I support the proposed regulations but would beg for more stringent ones: a) limit the number of dogs to the walker, to 3 dogs per walker; b) certify/license dog walkers; c) enforce IRS and State income tax requirements, and SF City&County business license fees; d)do not allow dogs to roam free at any point on the Crissy Field beach, for the reasons stated above [Crissy beaches are the safest beaches for children; children should be provided priority access and protected from dogs.] e)fence in other non-beach area selected for dogs to roam off-leash; f)conduct close monitoring of dog walkers and ticketing walkers who fail to meticulously clean up after the dogs. Thank you very much.

Correspondence ID: 1233 **Project:** 11759 **Document:** 38106
Received: Mar,11,2011 16:51:02
Correspondence Type: Web Form
Correspondence: I hope you regulate the number of dogs these dog walkers are allowed at a time on the beach. I can't stand them running in packs it's scary and unsanitary!

Correspondence ID: 1234 **Project:** 11759 **Document:** 38106
Received: Mar,11,2011 16:55:47
Correspondence Type: Web Form
Correspondence: Off leash dogs should not be allowed in the GGNRA. Dogs destroy plants. I

have plants outside my house in San Francisco. Owners who have their dogs off leash don't pay attention to what their dogs are doing. They destroy my plants and I have to replant about once a month. I have also seen dogs off leash doing the same thing in the GGNRA and I imagine there aren't people or resources to keep replanting in the GGNRA.

Correspondence ID: 1235 **Project:** 11759 **Document:** 38106

Received: Mar,11,2011 18:04:13

Correspondence Type: Web Form

Correspondence: Dear Park Managers:

I write to support the preferred alternative for dog management.

As I see it, there are significant groups of people whose enjoyment of the off-leash areas of GGNRA are severely impacted by free-roaming dogs. It's not right that their use of such areas should be prevented or inhibited by people's pets.

First are the blind who use service dogs. Service dogs cannot function properly when off-leash dogs are frolicking around, so my blind friend (and other blind people) can't use those portions of the park.

Second are small children who can easily be knocked over by romping dogs, are frightened by large groups of dogs running around together (as happens when dog-walkers bring many dogs in a group), and can be seriously traumatized by being bitten, scared or knocked over. It's been my experience that some dog owners fail to stop their animals from jumping up on people, adult or child; they simply don't see anything wrong with such behavior.

Third are runners and cyclists, who get tripped up and sometimes injured by dogs that run right in front of them. Some dog owners speak sharply to runners, saying that of course a dog will chase a running person, what do they expect? This is not right.

Fourth are endangered species in the park--snowy plovers and others--that get chased by off-leash dogs. We need to encourage the survival of threatened species, and dogs--as your own studies show--are detrimental.

Moreover, it's been my experience in more than 30 years of running, biking and walking in GGNRA that "voice control" is as real as the tooth fairy--a nice idea, but doesn't really exist. No plan that results from this process should contain the words "under voice control." If you don't believe me, go out to an area where dogs run free and ask the owners to call their dogs in.

Watch how many obey....

In conclusion, some dog owners seem to believe that GGNRA is obligated to provide them with space for free-running canines. This is not part of the park's mission. If people want to own dogs that need to run free, they should go to dog parks set aside for that purpose. Their convenience should not take precedence over that of the blind, the very young, athletes and endangered species. I hope you will see beyond the noise, demonstrations, signs, costumes and appeals of those who oppose the proposed new regulations: just because they are more vocal and more organized doesn't mean that their arguments make sense.

Sincerely, Eve Pell

Correspondence ID: 1236 **Project:** 11759 **Document:** 38106

Received: Mar,11,2011 18:14:08

Correspondence Type: Web Form

Correspondence: Dog owners often complain about having no space for their dogs to run off leash. They say there are a lot of dog walkers in the bay area that want to use the GGNRA. I wasn't aware that having a dog put them into a special category that means they get land devoted to dogs. If they really wanted to share space as they often state, then they would advocate for more on-leash shared space. But this is not what they want. They want land just for themselves. As they are aware, on leash areas drive other visitors (like myself) away. I am even driven away from on leash areas due to the large number of off leash dogs in on leash areas. Runners can not run in areas with off leash dogs because dogs run after them and also often dart in front of them and cause them to stop running. It is very disruptive and makes it impossible for off leash dogs and runners to share the same space.

If the GGNRA is going to have any land that is for off leash dogs than there should be land just for people who enjoy the same recreational activity that I like. It is only fair. I am a runner and a hiker. There are at least as many and likely many more runners and hikers (without dogs) than there are dog walkers that would like to use the GGNRA. I would like to see 5 mile (or more) uninterrupted trails for runner and hiker use only. That means no dogs at all. I am particularly interested in at least one five mile trail in SF, one five mile trail in marin and one five mile trail near to palo alto. I am not asking much. The total area of those trails would still be way under 1% of the total land in the GGNRA.

Correspondence ID: 1237 **Project:** 11759 **Document:** 38106

Received: Mar,11,2011 19:57:52

Correspondence Web Form

Type:

Correspondence: I live in Larkspur California next to Marin County Open Space District land so I am very familiar with the entitlement of dog owners, particularly the ones who claim to have their dogs under voice control. It is a narcissistic conceit held by two thirds of the lazy dog owners I encounter on the trails. They call fruitlessly to their dogs as their dogs have barked and chased and jumped on me as I run or bike. When I express terror, they claim that their dog is only a puppy or is really very friendly or some other excuse which doesn't fix those moments of terror or those falls caused by avoiding their dog or the ruining of my outdoor experience just so their dog can run free. There is one third of dog owners I've encountered who see me coming along a trail and wisely call their dog to their side or leash their dog if they are not sure that their dog won't get in my way. Those owners I always thank. The others get angry and hostile and profane when I suggest their voice control is lacking and a leash is called for. By the way, all the trails I'm referring to require dogs be leashed, but that rule is openly ignored by dog owners as various as parents with young children all the way up to elderly owners. Enforcement is nonexistent and the law is openly flouted.

I must admit I am so very tired of the attitude that a dog's freedom is the most important thing on trails and outdoor lands, more important than anyone else's enjoyment, more important than any other species of animal or plant. I am tired of seeing native grasses dug up by dogs on our GGNRA beaches and our native birds being endlessly chased by off leash dogs. I am tired of all the dog waste left behind either in or out of those commonplace plastic bags. Every trailhead in Marin near a neighborhood reeks of the smell of dog waste.

I would love to see the GGNRA buck the trend of kowtowing to loudly entitled dog owners and just say no and then enforce it. I would love to have some trails and beaches off limits to dogs and the rest requiring leashed dogs because voice control is in the entitled lazy mind of more than half of the dog owners. You and I both know that's true.

Correspondence ID: 1238 **Project:** 11759 **Document:** 38106

Received: Mar,12,2011 09:41:06

Correspondence Type: Web Form

Correspondence: I visit Mori Point at least 5 days a week. I love dogs, but I support prohibiting them completely from Mori Point for the following reasons:

- Some pet owners cannot control their dogs from impacting wildlife, even when they are on a leash. I saw a woman lose her dog off a leash and subsequently the dog chased a fox up and down the hill adjacent to the

Bootlegger stairs, obviously exasperating the fox and potentially harming it. I saw a woman with a dog on leash, let the dog trample into the pond where red-legged frogs were clearly present.

- More than a few dog owners do not clean up after their dogs. If owners were so convicted as to allow dog-walking there, it would be reasonable to pick up after someone else's dog in the interest of maintaining the privilege of walking their dog there. I have never seen this happen. The potential for disease to impact native wildlife is obvious.

- There are migrating birds, at least two are threatened species, which are not listed in your report. I have seen Phalarope and Terns in the Mori Point area, and of course, I have seen dogs harass both. Furthermore, I have seen dog-owners play fetch into the areas where these species are inhabiting.

- There are well-known studies (http://www.dfw.state.or.us/wildlife/dog_training/docs/dogs_MT_wildlife_society.pdf) which prove the negative impact of the presence of dogs, leashed or not, on an ecosystem.

- While Sharp Park is not a GGNRA land, it is adjacent to the Mori Point area. Within days of a fence being erected to keep dogs out of prohibited areas, dog-owners, who often use Mori Point as access, broke the fence so they could put their dogs off-leash in those very sensitive areas. NEVER have I seen this area enforced, even after several phone calls, because it is under San Francisco jurisdiction and will never be patrolled for enforcement.

- Ticketing does not result in the decrease of dogs off-leash in prohibited areas. I know more than a few people who have received tickets, but do not change behaviors, except to leash their dog if they see an enforcement agent. With budget cuts, there are even less enforcement agents available, albeit the potential for revenue.

As someone who witnesses the heart-breaking impact of dog-owners on the very few areas where wild animals and plants can exist, I beseech the GGNRA to prohibit dogs from Mori Point. Those plants and animals at Mori Point do not have a voice to counter the boisterous entitlement of dog-owners who have many alternative areas to go, but it is my hope that GGNRA listens to those who try to speak for their welfare.

Sincerely, Summer Lee

Correspondence ID: 1239 **Project:** 11759 **Document:** 38106
Received: Mar,12,2011 10:59:26
Correspondence: Web Form

Type:

Correspondence: One of the biggest surprises to me in becoming a dog owner, was my increased awareness and love of our local park resources. In fact, I almost felt like had become part of a secret society. As a non-dog person I only went to Fort Funston once, and that was because of the reputation for sand dune sliding (an activity that I'm convinced does more harm to the environment than the dogs ever could). I appreciate that the park system is looking out for the little birds that don't have a strong group of supporters advocating for them, but I am not convinced that more regulation of dogs and their owners is the answer and think that it will do more harm than good.

Current policies are not posted clearly or enforced. I have never seen a ranger at Fort Funston and I've been there almost three times a week for the past year. It is not clear where leashes may be required and where dogs shouldn't go (are those ice plants between the parking lots ok? The hanglider walkway? It's not clear). Crissy Field is actually really nicely marked with an explanation of the birds that the restrictions are there to protect, and I've noticed that dog owners are respectful of those restrictions.

Another situation that I've noticed taking an increased toll on the parks is an increase in unprofessional behaviors from dog walkers. I would argue that requiring a dog walker registration and limiting the number of dogs per dog walker would be a huge help in protecting our parks. I've witnessed dog walkers accidentally leaving a dog at the beach, missing lots of poops, abandoning a blind dog at the top of the cliffs, and more, all when they are obviously caring for more dogs than one person can possibly keep an eye on, which creates tension and frightening moments for people and dogs outside of the pack.

What concerns me most about the proposed policy, is the suggestion that further restrictions on dogs will become easier to make without public input. It is hard to imagine the toll that our government cuts are taking on the sustainability of our parks system. It appears that in many ways this approach to limiting use and limiting public input is a response to that. But is it short-sighted? What is the point of preservation if citizen's use is so severely limited that nobody cares to contribute to its preservation?

Correspondence ID: 1240 **Project:** 11759 **Document:** 38106

Received: Mar,12,2011 11:40:49

Correspondence Type: Web Form

Correspondence: Hello,

I am a parent and a san francisco resident for 19 years and a dog owner. And

I strongly oppose this new plan to curb off-leash dog use in the GGNRA. In my opinion and in my experience, dogs become calmer and better socialized when they are regularly exercised with their owners off-leash in large open areas. Dogs that are cooped up all day, whose exercise amounts to a couple of short walks on leash through the neighborhood, and occasional visits to a dog park which will be cramped and chaotic are not happy well-adjusted dogs.

We already have a city filled with dogs. A third of us are dog owners. This is how we have chosen to live as a society, we allow pets. And as a society it is our responsibility to care for them. Their needs are important, as important as snowy plovers and having public space that is free of dogs for those who don't want to interact with them. Protecting the land and protecting the safe public use of that land is our duty. It is also our duty to care for our dogs. And if we want to live with happy, well-adjusted, friendly ones then they need be allowed large public areas of off-leash use.

The DEIS would not only further restrict what is already less than 1% of the entire GGNRA, but the "poison pill" included in the bill would virtually guarantee the complete elimination of off-leash use. It is unavoidable that there will always be some misconduct on the part of a few irresponsible dog owners. And those few incidents would allow the GGNRA to eliminate all off-leash use. It is a gross over-reaction to punish all the dog owners and their dogs for the negligence of a few when the vast majority of dog/people interactions in the GGNRA are entirely positive. In fact, most of the dog related incidents in the park are simply citations for dogs off-leash in restricted areas. Hysteria over dangerous and damaging interactions between off-leash dogs nature and the public are drowning out the clear benefits of all dogs getting room to roam. Responsibly exercising your dog off-leash in open spaces is what allows all of us to live with friendly sociable dogs. Restricting that will cause a glut of more troublesome dogs crowding out small inner city parks and play spaces.

My dog and I run trails. And I would especially like to make the case for trail use and off-leash dogs. The only trail that is even barely long enough to run is Land's End. And running trails off leash is much safer and more enjoyable for the both of us than when tied to each other, plunking along city streets. We have never had any negative interactions with people while doing this. He stays with me, follows my commands, and I pick up after him and watch him because he is my responsibility and I like so many other San Franciscans am a responsible dog owner.

The natural beauty of San Francisco is one of the biggest reasons to live here. We protect our open spaces and make them accessible. But with only 1% of GGNRA available to off-leash dogs, and almost no open space in Marin, why should we even consider restricting off-leash dog areas further?

It will make the outdoor spaces far less enjoyable for dog owners (a third of San Franciscans), and the many, many people who are not dog owners but still like having them here. It will make for crowded, poop-filled, over-run inner city parks. And it will make for more aggressive and less sociable pets. The DEIS is a giant over-reaction to a very small problem. One that is not good for dogs or people.

Correspondence ID: 1241 **Project:** 11759 **Document:** 38106

Received: Mar,12,2011 13:01:10

Correspondence Type: Web Form

Correspondence: I am *very pleased* to see the continuance of ON LEASH requirements for dogs in almost all NPS trail areas. I did not see Mori Trail (not confused with Mori Point) listed but maybe it is already established as ON LEASH only which is just fine with me. Unfortunately there are no bad dogs, only bad owners. My small dog (25 lbs) and I have had numerous encounters with off-leash particularly larger dogs in on-leash areas (e.g. Mori Trail) that required me to pickup my dog to avoid him being attacked -- literally one lab mix attacked ME to get to my dog. The owners invariably state that their dog "just wants to play." I'm not sure which dog behavior school these owners attended, but any dog presenting raised hackles and bared teeth does NOT want to play. I have also seen dogs (both on and off leash) have barking/aggressive encounters with both bicyclists and horses (Mori Trail). I have also been attacked without my dog at Fort Funston -- the dog packing at Fort Funston is so far out of control that I'm surprised the NPS hasn't been sued.

I am very very very much in favor of leash laws in any park/public area, whether it be NPS, city, county, or state.

I heard about this public document from the posted sign at the trailhead.

Correspondence ID: 1242 **Project:** 11759 **Document:** 38106

Received: Mar,12,2011 14:45:42

Correspondence Type: Web Form

Correspondence: I believe that all areas of the GGNRA should allow dogs, and allow them on voice control - no leash required. Education should be planned to educate owners about their surroundings in various areas of the park so that owners can act responsibly and keep their dogs on trails or next to them, with the use of voice control.

Correspondence ID: 1243 **Project:** 11759 **Document:** 38106

Received: Mar,12,2011 15:12:43

Correspondence Web Form

Type:

Correspondence: Dear Mr. Dean,

I am a frequent user of Baker Beach and would like to voice my support for Alternative A for Baker Beach (Map 12-A:Baker Beach). I have two dogs of my own and am sometimes providing foster care for a third through the SPCA. Baker Beach is a great alternative for me because I am a runner, usually running about five miles a day, and at Baker Beach I can accomplish this while simultaneously exercising my dogs. Baker Beach is uncrowded, and has great wide open spaces for dogs to to run and play without interacting with any wildlife or fragile plant life, more so than any other beach I am aware of in the area. My dogs are under voice control, but on Baker Beach they can proceed at their own pace, stopping to play with other dogs and then catching up again, making the whole run far more fun for them and for me. Regular dog walkers at Baker Beach are very careful about picking up their own dog's waste and any other waste that they see. I believe Alternative A takes into account the needs and interests of the majority of recreational users of Baker Beach without having a negative impact on any of these users, or perhaps more importantly, the environment.

Thank you, Sally Shapiro

Correspondence ID: 1244 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,12,2011 17:12:08

Correspondence Web Form

Type:

Correspondence: Thank you for the hard and careful work to provide appropriate access to this regional treasure. I support the NPS preferred alternatives for dog management. Though now a senior citizen I have raised children, owned a dog and hiked in GGNRA for many years. I would not consider taking my dog into most of these areas.

I think you have identified the key issues and provided a balanced plan which protects the flora and fauna which use these open spaces and make them so unique. I want the ability to observe the birds, sketch the views and plants and feel safe. I fear for myself and children being knocked about, nosed and licked by frolicking dogs because I have seen this happen. Having approved areas where I can choose to be or not to be around dogs meets my needs. Thank you for the opportunity to comment.

p.s. I thought it was weird that your question about how did you hear about the document didn't let me choose TV. That's how I heard about the EIS being ready for comment.

Correspondence ID: 1245 **Project:** 11759 **Document:** 38106
Received: Mar,12,2011 17:17:10
Correspondence Type: Web Form
Correspondence: Dogs are man's best friend but it is essential to the vitality and preservation of our wildlife and open spaces that this plan be enacted.

Correspondence ID: 1246 **Project:** 11759 **Document:** 38106
Received: Mar,13,2011 00:37:32
Correspondence Type: Web Form
Correspondence: Summary:

1. Dog walkers should be admitted to ROLAs for a fee, if they can demonstrate voice control by calling their dogs from a reasonable distance.
2. ROLAs make sense only where the vegetation is already degraded, such as lawns or expanses of introduced weeds, and in parking lots.
3. ROLAs must be clearly marked and get extra cleanup.

Discussion:

The National Parks are national, so people who happen to live nearby do not really rate more say in making rules than people who don't. The parks are here to preserve all Americans' natural resources and, secondarily, provide outdoor enjoyment and education. Since dogs need contact with nature and other dogs, it is only humane to allow some dog walking, but as a privilege, not a right.

Any healthy dog allowed to run off-leash is going to chase, dig, excrete, and otherwise damage the park on every visit. Most owners are careful to clean up pet feces when they can, but not all is removed, and there's no cleaning up urine. In addition, some overestimate their voice control. Too often I've seen dogs rush around a newly-planted area digging holes, chasing mice, and relieving themselves, while the owner shouts the dog's name to no avail.

Correspondence ID: 1247 **Project:** 11759 **Document:** 38106
Received: Mar,13,2011 09:38:52
Correspondence Type: Web Form
Correspondence: As I San Francisco resident, I am offended to not be part of the "special class" that is apparently off leash dog walkers. Why do they get a special area to recreate? Having a dog is a choice and thus they should not be

treated like a protected class, especially at the expense of real protected classes, in particular the disabled and blind. If the GGNRA wants to make/continue to have any off leash dog walking land, then there must be land designated with signs for other recreation. I want to see hand glider land, runner land, bike land, walker land, bird watching land, plant observation/appreciation land, land for meditation, land for yoga, land for the disabled, etc (I am probably forgetting a lot of different recreation groups). Obviously this land would not be closed to people enjoying other recreation but rules must be put in place in each of these areas. For example, in the meditation area, no talking or making noise would be allowed. In the runner area, non-runners must stay to the left. In the bird watching land, no yelling or making loud noises. And in the dog off leash area, no complaining if dogs run up to you, nibble on you, lick you, disturb your activity or otherwise cause you harm. Again please create space designed for many types of recreation that happen in the park. Alternatively, if the GGNRA is on leash only and dog free where environmentally indicated, then it is fair to have the land be multi-use.

Correspondence ID: 1248 **Project:** 11759 **Document:** 38106

Received: Mar,13,2011 11:20:58

Correspondence Type: Web Form

Correspondence: My husband Noah and I moved to Montara in 2000 specifically because of the access to the local trails. As dog owners and frequent hikers and joggers on the trails, our availability to access the trails with our dogs is very important to us. Please keep the trails available to dog use on leash.

Thank you, Adrian

Correspondence ID: 1249 **Project:** 11759 **Document:** 38106

Received: Mar,13,2011 11:45:55

Correspondence Type: Web Form

Correspondence: I am writing to oppose the proposed GGNRA Dog Management Plan. I am a long-time resident of San Francisco. My friends and I have been responsibly walking our dogs at Fort Funston, Crissy Field, Marin Headlands and other locations in the GGNRA for many years. Our dogs are always either on-lead or under voice control.

I am a long-time environmentalist and strongly support laws and regulations that protect the environment, just not this one.

Daily walks with my friends and our dogs in the GGNRA is an important part of my social life. It also plays a major role in my exercise program for

keeping healthy.

Wildlife in the GGNRA needs protection but the proposed GGNRA plan is too extreme. The San Francisco Bay Area is a heavily populated urban area where multiple needs have to be balanced. The proposed GGNRA plan does not sufficiently protect the needs of the people who regularly use the GGNRA.

I am writing S.F. Representative Nancy Pelosi, Senators Boxer and Feinstein plus the San Francisco mayor and board of supervisors and urging them to actively oppose this extreme proposal.

Best regards, Lynn MonSanto

Correspondence ID: 1250 **Project:** 11759 **Document:** 38106

Received: Mar,13,2011 13:53:17

Correspondence Type: Web Form

Correspondence: While I feel that environmental protection is VITAL to our way of life I believe that the proposals here are unfair to the vast amount of dog owners in the Bay Area. There have been problems with dogs; dog walking groups and ugly people, but there are confrontations of all sorts anywhere we humans congregate. Often they are far more severe involving PEOPLE WITHOUT DOGS! I do agree with the proposal requiring permits for groups larger than 3 dogs, as I do feel that the groups/packs can be a bit too much(at times). I do STRONGLY believe that to punish the individual dog owner who enjoys a hike; jog or just a walk with their beloved friend is SO UNFAIR!!!! As far as people not wanting to be around dogs there are MANY MANY areas where they can enjoy themselves that do not allow dogs at all. So in fairness to all there MUST be a solution that will agree with all residents (human, canine and equine alike)of this beautiful area. On another note, where is the concern for the environmental impact of HUMANS and their garbage, bottles, cans, DIAPERS and various other debris left behind by PEOPLE! Thank You

Correspondence ID: 1251 **Project:** 11759 **Document:** 38106

Received: Mar,13,2011 17:11:34

Correspondence Type: Web Form

Correspondence: I am an older, somewhat disabled dog owner, with a therapeutic need for a dog. I work full-time, pay more than my fair share of taxes, and respect the environment tremendously. I compost, recycle and have even adopted 4 children from the foster care system, so great is my interest in a sustainable world. All my dogs have been hard-to-adopt, meaning larger sized.

I need to have off-leash, dog-walking areas in some part because it hurts my back to be pulled by a dog on a leash. I wouldn't be honest if I didn't say that I also think dogs need to run and play un-fettered and I know from experience that dogs can be trained to follow oral commands and not interfere with other wildlife.

I promise to do my part to make sure my dog(s) leave other species alone--and of course, clean up after the dog(s)--and would like to ask you to leave off-leash dog areas so that people like myself can have dogs in our care.

Thank You.

Correspondence ID: 1252 **Project:** 11759 **Document:** 38106

Received: Mar,13,2011 23:17:07

Correspondence Type: Web Form

Correspondence: I'm not a dog owner. I do enjoy regular strolls at Chrissie Field. No matter what mood I'm in when I arrive, I leave happy to be alive. The sea and the sky are great spirit boosters...but the best mood elevators are the (off-leash) dogs. Their joy is contagious. They are sometimes graceful, sometimes goofy, and for the most part, wonderfully welcoming. They often lope up to me, give me a friendly sniff, and then proceed to entertain and amuse in countless ways. It seems to be that the contested beach and park areas would be much less exuberant places without the bounding/boundless spirit of these creatures. Yours truly, Marny Hall

Correspondence ID: 1253 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 01:19:58

Correspondence Type: Web Form

Correspondence: I want to say I appreciate your doing this survey. Please put me down as a park visitor who is adamantly against having dogs, on leash or off, in our parks. At Fort Point and Chrissy Field, as in Santa Cruz, I have encountered more examples of rude, self-righteous, law-breaking individuals walking dogs than I care to remember. First off, there is no such thing as a leash only area for dog walkers. Any area that is designated as such is a joke. I have never met a dog walker who, when no one is looking, can resist the temptation to remove the leash and let his/her dog run loose. In Santa Cruz the off leash dog advocates have clearly stated in their website, folf.org, that their followers should always carry a leash, but only use it when there are no rangers in sight. As soon as the ranger appears, they put the leash on until he is gone. This behavior is not peculiar to Santa Cruz. I believe the off leash advocates in San Francisco are even more recalcitrant. Voice control, as I

have seen it practiced in GGNRA, is a complete hoax. Having dog owners yelling at their dogs with no apparent effect is almost as disturbing as the out of control dog itself. Most dog owners I've witnessed at GGNRA have no concept, let alone ability, of how to train their dogs. Many dog owners, because of their small stature or youthfulness, or temperament have no ability to control their dogs even when they are on leash. Typical of this is the teenage girl with a pit bull on leash. Not even close to being able to control such an animal intent on taking down its next victim. These behavior short-comings are only one element in the matrix of dog/human interactions that result in people not going into our parks such as GGNRA. Nobody wants to go to a park and be faced with the uncertainty for their own safety that is posed by a poorly or untrained dog in the hands of a defensive, untrained human. When the dog in question is a labrador or collie it is one thing, but when we are talking about the ever-present pit bulls and rottweilers and dobermans then we have a legitimate life-safety concern. Talking about people who might be afraid of dogs, as though it is some phobia on their part or psychological short-coming, is an insult to ones intelligence. Meeting people while walking in the park who are carrying air-soft guns would be the equivalent of meeting toy poodles or chihuahuas. Running into pit bulls or rottweilers is like going up against people with AK-47s or Mac 9s. Injuries in the latter case could be life-threatening with broken bones, lacerations, etc. Anyone who is not afraid of fighting off one of these dogs is fooling themselves. As far as the environmental degradation goes....well, where does it stop? When the dog excrement is bagged, if it is even picked up, and then dropped in the garbage for transport to our landfills....shouldn't this material be going to the sewage treatment plant? When did it become alright for us to put human or animal waste into our landfills? Why are our beaches and parks, such as the GGNRA, subjected to constant inundation with canine fecal material and urine. I, for one, am sick of the stench of urine and feces at the beach. Is this where we want our children to play in the sand....where some dogs have been doing their business day in and day out? What about the effects of the feces-borne pathogens, and there are many of them, that become part of the habitat of our otters, seals, shorebirds, fish, etc.? I frequently witness, both at home and in the GGNRA, the dog owners who don't think anyone is looking so just walk away from their dogs poop pile. Or the ones who bag it and then just leave the bag of feces there on the ground for someone else to pick up. It is really way past time for responsible law enforcement to step up and slap these people with stiff fines on the first offense. I've watched these apologetic, half attempts to influence the dog peoples behavior with field contacts and warnings and educational encounters. It is pretty obvious that it is not working. In fact, behavior is getting worse because there is no penalty. Enforcement needs to be swift and sure. These parks are for people, not people with dune buggies or motorcycles or fireworks or guns or dogs. And since dog people seem to be unable to live with rules designed to protect other users from the excesses of their furry friends....they should be

excluded entirely from the GGNRA. Your idea of converting on leash only sites to no dogs at all when failure to abide by the rules is the norm strikes me as very effective. It eliminates the hide and seek merry-go-round between law enforcement and dog owners who only use their leashes when the ranger is in sight. Penalties should also escalate with repeated offenses. I'm not going to live long enough to ever see all the dog owners reach the point of obeying the law without being forced. This fight has to begin soon. Please take effective action as soon as possible to make our parks the enjoyable, stress-free, safe and healthy places that they were intended to be. If some provision for dog recreation must be provided then the only acceptable solution is fully fenced enclosures. This is the commonly found solution in most of our major metropolitan areas and it ensures the safety of the dog people and their pets while allowing the majority of park users to fully enjoy their park experience unfettered by unwelcome canine advances. Fences should be at least 4 feet in height. Once again, thank you, for this opportunity to express my feelings on this highly emotional topic.

Correspondence ID: 1254 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 10:32:50

Correspondence Type: Web Form

Correspondence: I am in full support of the proposed leash requirement to protect GGNRA. As a long time home owner in Mill Valley, I and my children had encountered many unpleasant incidents with unleashed dogs at Muir Beach, Rodeo Beach, Stinson Beach, and at areas along SF Marina. These incidents prevented our family from frequenting these areas for the last 10 years. We also had to erect a fence around our yard to protect our garden because of the destruction of our garden by neighbor dogs and commercial dog-walker dogs. I also work at San Francisco General Hospital where we treated children and tourists who sustained dog bites when they are visiting San Francisco Beaches. In addition, we must not forget that more than 500,000 ED and urgent care visits for dog bites are reported every year in the US. Dogs are good human companions but we cannot and should not expect that dogs will behave as human. It is unrealistic to expect unleashed dogs to know where to run and not to trample into protected/fragile lands. It is unwise to expect unleashed dogs not to disrupt a pleasant picnic or not to lick off foods from small children. Please make this leash requirement a reality to protect our parks and to bring back the pleasure of living/walking in this beautiful area of the US. Thank you for bringing this regulation proposal to completion.

Correspondence ID: 1255 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 10:51:46

Correspondence Type: Web Form

Type:**Correspondence:** Dear GGNRA:

I am a 52 year-old homeowner, practicing attorney, and mother living in the West of Twin Peaks area of San Francisco. I have been a GGNRA member for many years and feel especially fortunate to live near this wonderful open space. I also regularly visit Fort Funston, where I have walked my Australian Shepherds for over 15 years.

I support the maintenance of the status quo. Off-leash recreation is not just for dogs, but for people, too. Walking at Fort Funston provides essential, easy exercise for me, my daughter, and her friends, as well as for my well-behaved, well-trained dogs. In particular, closing off the area north of the water fountains -- the path that goes downhill and back uphill in a loop -- would be a terrible blow for walkers and seems tangential to the maintenance of wildlife and indigenous flora. And dog walkers respect the boundaries that now exist in that part of the park. For instance, when the Park Service fenced off a portion of that area many years ago to protect native plants, people kept (and do keep) their dogs out.

As I understand it, Fort Funston was given to the National Park Service years ago with the proviso that the area remain open to off-leash recreation. It should remain so.

Thank you --

Margaret Murray

Correspondence ID: 1256 **Project:** 11759 **Document:** 38106**Received:** Mar,14,2011 12:10:55**Correspondence Type:** Web Form**Correspondence:** This is a devastating idea. Crissy Field is the ultimate destination for dog-owners all around the city, and closing its off-leash privileges would leave the city destitute of one of the only places around where our furry family members can run free. Not once in my 4 years of living in SF and bringing my dogs here daily have I ever heard of a complaint from other beach-goers about off-leash dog behavior. The reasons for this seem completely unjustified, and the loss to the city absolutely devastating. On behalf of the many, many dog-owning residents of this city, I beg you to reconsider. Thank you.

Correspondence ID: 1257 **Project:** 11759 **Document:** 38106**Received:** Mar,14,2011 13:28:55

Correspondence Web Form

Type:

Correspondence: Every weekday, around noon, I find myself cursing my clients' legal departments and barking at them over email. I am a self-employed marketing executive who left a corporate job in San Francisco to work from home in Montara, and be near my dogs. My job is very stressful; I work with CEOs and VPs of Marketing at busy corporations, and there is always more to do than any day allows. About the time I put my head in my hands out of frustration, my golden retriever Taylor, 3, jumps up, puts one paw on each of my shoulders, and gives me a kiss on the face. It is his way of saying, "enough stress, let's go for a walk." And out we go.

We walk out our door of our house on 4th street, turn right on Main, and walk two blocks down to the entrance to Rancho Corral de Tierra. The second I take the leashes off Bailey and Taylor, they begin to frolic, and I begin to smile. They chase balls and carry balls, they greet visitors, and they model a carefree and stress-resistant life for all the humans who see them. For me, this elicits my first (and often only) smile of the day. It is my form of exercise. It is my meditation. It is my joy.

I taught myself to run on these walks with my dogs. I taught myself to monitor my heart rate. I taught myself to hike. Or rather, my dogs taught me to do these things. They guided me. They helped me reclaim my life while breathing in the ocean air and taking in the gorgeous coastal views. On the way, I lost 40 pounds.

And this is the reason I moved to Montara, the reason I moved to Northern California (from LA, Chicago and Phoenix). If you take away the ability to enjoy nature, led by my dogs, I will most certainly leave this state. I will certainly have to sell my property in Montara, as house prices will plummet, and it will no longer work for my lifestyle. You see, I have no children. My entire existence is built around my dogs. And this is true of nearly everyone who uses the trails in Rancho Corral de Tierra in Montara. We all moved here so we could walk our dogs off-leash in the beautiful natural surroundings of Montara.

Coexisting with Nature and Other Users

We often see a Great Blue Heron on our walks at Rancho Corral de Tierra, and my dogs co-exist with him very peacefully. He is never bothered by us, and we never bother him. This is nature working as it should, and humans being allowed to enjoy the environment they live in. This is what I pay property taxes for.

When I walk my dogs at Rancho Corral and they are allowed to run off leash, they are my under voice control. When we see other people with dogs

on leash, I put mine on leash. When there are horses or people on bikes, I put them on leash. I have NEVER had a problem with anyone I have encountered on this trail in the TEN years I have been living here and walking my dogs each and every day. 3,650 times I have walked my dogs peacefully on these trails, with no negative encounters. We PICK UP litter and trash we see, and smile and greet every passer-by. It is a no-asshole zone ... and frankly the only one I know of.

Self Policing Community

Bill Bechtell has organized a fabulous community of responsible self-policing peers who reinforce picking up after our dogs and each other. We have photos of each other and our dogs on a website, so we know who the others are. There are weekend trail cleaning days, and self-maintained waste disposal cans and clean-up bags. Because we know each other, there is peer pressure not to let your dogs go to the bathroom without picking it up. **THIS AREA COULD BE A MODEL FOR HOW TO HANDLE THIS CONTROVERSIAL ISSUE PEACEFULLY, ASKING CITIZENS TO TAKE CONTROL**, or risk losing their rights. Our disparate land users (bikers, hikers, equestrians, and dog owners) all get along and share responsibility in self-policing the lands.

The Land

No scientific studies were done on this land to conclude that banning dogs is necessary. In fact, I bet you will do more harm to the environment if you ban dogs, because the pet owners will be angry and retaliative.

A complete ban on dogs is obviously extreme and would cause riots and mass exoduses. But your preferred Option D is also extreme. I would like to respectfully request that Alternative E be your preferred alternative for new lands. Alternative E states that "New lands begin as 36 CFR 2.15 (dogs allowed on 6 ft leash) and new lands with existing off leash use before acquisition may also be considered for voice and sight control in the future." This alternative is much less restrictive than your current preferred alternative.

There is so much space (tons of acreage) in Rancho Corral de Tierra. I hope you will consider that the percentage where we wish to walk our dogs is actually infinitesimal. Please think about creative multi-use solutions. Areas specified for off-leash walking. Or morning and evening hours for off-leash walking.

Public Comment?

And as for public involvement, our community has been purposely ignored

in this process. Without regard to the adverse affects on local residents, dogs are being banned because it is easier & cheaper for GGNRA. There was one public meeting, which I attended, a year ago in Montara. MANY dog owners attended -- it was amazing the large turn-out -- to voice community concerns and desires. But Park Service representatives refused to address the concerns of dog owners, referring us to the dog management plan and draft EIS under development .

Further meetings were promised; yet, no further public meetings have been held in our area. And the Montara Dog Group has never been contacted for input to the plan.

Nowhere Else to Go with Dogs: Montara

There is no community center or public park in Montara. For this reason, a whole community has formed around dog-walking: I have met neighbors I never would have otherwise. And people have moved here (myself included) specifically because Montara has a dog-friendly reputation.

I am sure you have read in others' comments the benefits of well-exercised dogs. A well-behaved dog is a tired dog. Plain and simple.

But the nearest off-leash dog walking area will be 15 miles north at Fort Funston beach. I will not have time to drive my dogs here during the workday. So dog interaction & socialization will be substantially reduced, and when considered in totality, this will produce a more aggressive dog population.

Montara residents will be forced to drive to parking lots at McNee Ranch or Montara Beach, and cross busy Highway 1 with their dogs, in order to access McNee Ranch, formerly a 10 minute walk through Rancho. Even more dangerous, Montara residents may elect to walk along Hwy 1 to get to McNee Ranch. A man walking along this route was recently hit by a car and severely injured, and his dog was killed. THIS IS NOT SAFE.

If dogs are banned from Rancho, hundreds of dogs will have to be walked on narrow rural streets with no sidewalks.

For all those reasons, I WOULD LIKE TO RESPECTFULLY REQUEST THAT Alternative E BE YOUR PREFERRED ALTERNATIVE FOR NEW LANDS.

With Great Concern & Heartfelt Request for Compassion,

Chelsea Hardaway Taylor Hardaway Bailey Hardaway

Correspondence ID: 1258 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 14:47:15

Correspondence Type: Web Form

Correspondence: I lived in Mori Point area for over 33 years. My family love this are very much. And when we have our dog we always take them out for walk on Mori Point. We raised our dogs to be friendly and obeydience. We appreciate that GGNRA had re-adjust the whole Mori Point to be attractive for people from the other district too. Mori Point have attract many new people from all over the San Mateo county to come for walk, riding bicycle, even take their dogs for walk. Mori Point has bring lots of business for the local too. On top of that it brings up the value for our property. I would love to ask GGNRA to please consider leave Mori Point to be the open park for dogs so, they can run free and get good exercise and besides this park used to be open space for all the dogs and never have any regulation before. Please re-consider to keep this park to be the open park specially for the residence that live around Mori Point so we do not have to drive somewhere else to take our dog for walk.

Correspondence ID: 1259 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 16:02:51

Correspondence Type: Web Form

Correspondence: Greetings,

As an avid GGNRA user and dog owner I sincerely believe that the Bay Area community is better served with the allowance of regular off-leash dog recreation.

Before adopting my dog 3 years ago, it was the rare occasion that I found myself using any portion of the GGNRA. But, I now routinely find myself at Fort Funston, Crissy Field, Baker Beach and Ocean Beach. The current off-leash policy is the sole reason that I spend so much time at these recreation areas. It is also the sole reason that I have discovered and enjoyed so much of the GGNRA. I have deep respect for these areas and am adamant about making sure my dog is well behaved and that I also behave in a responsible manner.

In the three years that I have frequented these areas I have not run into any more problems with dogs than I have with people. The beauty of the current arrangement is that there is so much space for everyone. I am certain that reducing the current allowable off-leash space will only create dog incidents.

Dogs are better behaved, less anxious, and happiest when they get appropriate exercise. I know that without appropriate off-leash activity I will not be able to properly exercise my dog. In addition, having this activity with my dog is one of the things I look forward to most. I believe that it creates a bond between myself and my dog that otherwise would not exist. While this is most enjoyable, it also helps reinforce trust between me and my dog...a benefit that helps my dog obey commands. On a side note - this type of recreation with my dog has helped me stay very active and fit.

I cannot fathom how the DEIS thinks that eliminating almost three quarters of the current off-leash space is a good idea. That would force the thousands and thousands of dogs and people into too small a space. Harmful dog incidents (as well as harm to people) are bound to arise. It's a proposal that is set up to fail. With all due respect, I take issue with one of the main arguments used for reducing off-leash and leashed dog walking, which is: "it is inconsistent with NPS regulations." In 1978, the GGNRA took the position that "the ordinary guidelines outlined in the Code of Federal Regulations do not really apply in an urban area," and that "people and their animals have been visiting the park for too long to apply an all-inclusive arbitrary policy." Based on that position, the GGNRA, with a great deal of public input, drafted what is now known as the 1979 Pet Policy, which maintains the right for recreation with off-leash dogs at Fort Funston, Ocean Beach, Fort Miley, Baker Beach, Lands End, and Crissy Field. It seems to me that overriding the 1979 Pet Policy is a breach of contract and will result in public distrust of the GGNRA management and leaders.

I believe that the interests of all GGNRA users will be better served leaving the current pet policy in place.

Thank you, Kim McCalla

Correspondence ID: 1260 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 17:07:14

Correspondence Type: Web Form

Correspondence: I have lived in the Marin Headlands for 13 years and enjoy running and hiking the beautiful Alta Trail near my home. However, over the years this trail has been fouled with dog feces and overrun with dogs, all of them off leash. At the trail head, there is now a large kitchen trash can overflowing with bags of dog poop. On a recent 3-mile walk, I counted nine plastic bags of dog waste lying on the trail, but not an owner of dog-walker to be seen. And, of course, there is also the dog crap simply left in the middle of the trail.

As a person who is not comfortable with dogs, it is frightening to have a

Rottweiler or a pit bull or even a 70-pound Golden Retriever charge at me. Even worse is meeting up with a dog-walker, often with as many as a dozen dogs, and find myself surrounded.

My understanding is that if these dogs are off leash, they are required to be under voice control and within sight, but this is not the case. Sometimes the owner or dog-walker is no where to be seen. If they are, and I ask them to "Please call your dog," they invariably reply, "Don't worry, he's friendly." I wonder if they would think I was friendly if I charged at them? Very few of these dogs are trained at all to come when called, and the owner just stands there shouting, "Baxter, come here. Come here!" Perhaps they do not know that dogs don't speak English.

Recently, I was attacked by a very aggressive dog that was off leash. It snarled and leapt at me, all the while the owner cried "Jacob, no!" and tried to pull him off. I was left shaken and with deep scratches on my leg. The woman actually told me the dog didn't like people without dogs and that he was "more aggressive when he's on a leash."

I'm sure it is wonderful for people with dogs to let them run free. I'd like the same freedom, and to be able to run without being harrassed by dogs. As I said, voice control is a joke. I think it's great to have designated off-leash areas, but I think Alta Trail should not be one of them. I support Alternative C.

Correspondence ID: 1261 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 17:28:43

Correspondence Type: Web Form

Correspondence: I just want to say that I am wholeheartedly OPPOSED to all the changes you are suggesting. I don't agree with any of the Preferred Alternatives. I want things to stay they are - actually, I would like to ask for more off-leash space for dogs and their owners. I have 2 dogs and they love every trail, every beach and every park that you now allow them to run off-leash and play. They are well-behaved and we follow all the rules you have posted. I would like you to add more signs, such as ones that reminds dog owners that it is a federal crime to let dogs chase after migratory birds, and that they are expected to pick up their poop, and that aggressive dogs are not allowed and must be leashed. These ideas are much more effective and fair than banning all dogs or even restricting them. I disagree with your restricting dogs to parts of certain beaches and then asking us to keep the dogs on a leash. That wont work; my dog will think he is being punished. It would be a form of inhumane treatment NOT to let my dogs play and romp. This dog socialization and activity is key to their well-being and mental health. Same for the owners. The socialization and community building, as well as the

exercise, is a net benefit for the humans and the the dogs. Please reconsider these bad proposals. I frequent many of your parks and my dogs would suffer if these changes were implemented. Please leave the GGNRA open to well-behaved dogs and responsible owners.

Correspondence ID: 1262 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 19:23:32

Correspondence Type: Web Form

Correspondence: I have a good friend who lives in the Presidio portion of the GGNRA. He has a beautiful chocolate lab that he walks daily in various areas of the GGNRA dedicated to off-leash access. On a number of occasions I've accompanied him and his dog for walks... never have we had a problem and we (humans and canine) would have our enjoyment of the park greatly diminished if the new harsher restrictions to off-leash access were enacted. Yes, harsher penalties and stricter enforcement for irresponsible dog owners... but please don't punish the responsible for the uncommon actions of the few who are irresponsible. Thanks, Steve King

Correspondence ID: 1263 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 22:49:51

Correspondence Type: Web Form

Correspondence: I would like to voice my support for reasonable restrictions on dogs and dog walkers in our national park. Because of the sensitive nature of a national park, in terms of environmental and wildlife issues, it is common sense that dogs should be kept on a leash at all times while in our national park. In certain areas, where specific threats to wildlife or the environment exist, such as Rodeo Beach or Muir Beach, dogs should not be allowed at all. One of the most important roles of national parks is to protect our natural resources for generations to come, and unrestricted dog running is contrary to this concept.

Dog owners and walkers should be expected to conduct themselves in a responsible manner while in our national park. This means having consideration for other people in the park, keeping their dogs under control, and cleaning up after them. A disturbing trend that I have been seeing in the past few years is that dog owners are leaving small plastic bags of dog excrement alongside trails. It is great that they cleaned up after their dog, but then for some reason, they have the idea that someone else can pick up the bag for them. In a half-day hike in the Marin Headlands last month, I saw five of these plastic bags of dog excrement alongside the trail.

Another issue is that of professional dog walkers, who are using our park as

their business location. Dog walkers with as many as 10-15 dogs have become a common sight in the Presidio, and often none of the dogs are on a leash. The dogs are tearing through sensitive environmental areas, and are beyond the control of their walkers. Excrement is left on the ground, fouling habitat and causing a nuisance for other people using our park. Professional dog walkers should be required to purchase a permit for the use of our park for business purposes. Taxpayers should not be forced to subsidize their businesses. At the same time, a strict limit on the number of dogs they can walk at a time should be enforced.

Correspondence ID: 1264 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 23:49:34

Correspondence Type: Web Form

Correspondence: I am writing to comment on the GGNRA Draft Dog Management Plan. I will get right to it, I am against the preferred plan to ban dogs from Rancho Correl de Tierra. Off-leash dog use should continue to be allowed, as it has for decades. Now I will address my thoughts as to why.

I am a homeowner and resident in Montara, as well as a dog owner, both for 9 years. The natural open space between Montara and Pacifica is the primary reason my husband and I decided to buy a home in Montara. We are both avid about spending our recreation time outdoors and living in Montara affords us the ability to enjoy the outdoors within a few blocks of our home. We hike and mountain bike regularly in Rancho Correl de Tierra, Montara Mountain, and the other adjacent nature areas.

We rescued our dog, Dusty, within a few months of moving into our house and have been walking/hiking with Dusty in Rancho Correl de Tierra for over 9 years now, off leash. We take owning a dog very seriously and are diligent at ensuring Dusty gets appropriate exercise. After all a tired dog is a happy dog. We walk Dusty everyday, twice a day. On average we walk him in Rancho Correl de Tierra 5 days a week, at least once a day. Dusty loves the walks in nature, the different smells, friendly sniffing with other dogs, and pets from other walkers. We maintain this walking routing despite the rigors of both being full time working professionals while raising a son, Cody, who is now 4 and a half.

Dusty is Cody's best friend, or as he refers to him "his brother". Cody is also an avid outdoor enthusiast. Cody has been going out to Rancho Correl de Tierra since he was 6 weeks old in his infant seat in my off road stroller. Everyday for four and a half months while I was on maternity leave the three of us (myself, Cody and Dusty dog) spent hours in Rancho Correl de Tierra hiking around. It was a fantastic way to spend time together and get

exercise and fresh air for all.

As I understand the GGNRA Draft Dog Management Plan, the preferred option for Rancho Correl de Tierra is to ban dogs completely from Rancho Correl de Tierra. This seems appalling to me. This would mean my walking my son Cody and my dog Dusty was a crime and I would be penalized for doing what I have been doing for over nine years. I think you are failing to recognize that Rancho Correl de Tierra is an area adjacent to a suburban area where residents have been walking their dogs off-leash for decades.

I have mentioned to my son, who is the ripe age of 4, that Dusty may not be allowed in the open space anymore because the new owners were not going to allow dogs. Cody's response to me was, "Why do they hate Dusty?" And, Cody went on to state that all the dogs out in the field (which is how he refers to the open space) are nice and play with him. When I heard this I thought "have you considered the message this will send to our youth, the future of this country".

I am a rather disgusted that the nature I work to preserve is potentially to be taken away from me and my family, and the rest of the residents of Montara. The dog walkers and Montara Dog Group are who keep the trails in good shape overall. We spend our own time, money and resources to keep trails clear, to build bridges, and assist with drainage issues. We police ourselves and the dogs.

This is one place that I feel completely safe to be alone as a woman, and to have my son run free because everyone is very responsible and considerate.

As an avid mountain biker I have lived the impact of being banned from nature trails and now you want to ban my dog too. I thought the whole point of preserving our natural spaces was for people to enjoy and be enriched by nature. Well, if the preferred plan is adopted: ? I will lose the ability to walk my dog without committing a crime. ? I will have to spend money having others assist with walking Dusty. ? Cody will have less encounters with nature and his appreciation will diminish. ? I will receive less exercise myself and become less healthy. ? My dog Dusty will receive less exercise and become less healthy. ? My son Cody will receive less exercise and become less healthy. ? I will limit or eliminate my contributions to the park system, afterall I am not getting to use it for what I want to use it for. ? I will not spend my own time, effort and money to maintain the trails. Will you?

No wonder society is getting more obese. People cannot even walk their dogs except on roads where they are subject to drivers who are drunk, texting, talking on cell phones or otherwise distracted.

Now, as I stated in the beginning, I am against the preferred plan (D) to ban

dogs from Rancho Correl de Tierra. Off-leash dog use should continue to be allowed, as it has for decades. In the alternative, do not ban dogs, but allow them on-leash and consider off-leash use or an off-leash area.

Correspondence ID: 1265 **Project:** 11759 **Document:** 38106
Received: Mar,15,2011 09:24:18
Correspondence Type: Web Form
Correspondence: I am writing you to voice my opinion on making the GGNRA Dog Management Proposal.

I am AGAINST restricting off leash walking in the GGNRA's. There are few venues where I can run the dog without issue and the GGNRA included several of those venues.

There is not reason that these parks should be restricting dogs. If there are issues with dogs defecating or destroying property the owners should be heavily fined and not be allowed to ruin the parks for other responsible owners.

In this time of budget cuts and a tanked economy it is very concerning that money is being spent to restrict this activity..it just doesn't make sense to me and I want you to be aware that as a resident and MAJOR tax payer in the City, I am not in agreement with the proposal to limit dog access to any GGNRA land.

Thank you Stephen J. Reilly

Correspondence ID: 1266 **Project:** 11759 **Document:** 38106
Received: Mar,15,2011 16:11:44
Correspondence Type: Web Form
Correspondence: I have just one question. Why are you doing this?

Please don't restrict dogs from having dog parks. I don't even own a dog, but I know how important it is for dogs, humans, cats, birds, and the like, to have exercise. Please don't take away these dog parks, it's unfair to take away something you've already given. Dogs (and animals as a whole) create less of an environmental impact than humans -- in fact, humans create severe problems with their poor environmental planning, their fossil fuel wastes, nuclear plants, over farming, strip mining, oil using transportation vehicles (cars, planes), etc, etc, etc, etc (the list is endless).

At the risk of seeming rude, it would be nice if you could find more

substantive, logical, practical, and useful things to do with your time and the taxpayers money.

Correspondence ID: 1267 **Project:** 11759 **Document:** 38106
Received: Mar,15,2011 18:26:36
Correspondence Type: Web Form
Correspondence: Greetings,

The GGNRA DEIS is a very troubling document. The impact of the proposed changes on the City of San Francisco seem to have been completely disregarded. No doubt the statistics have been quoted already. 100,000+ dogs in the City. Dogs need somewhere to go. Historically, we have had such wonderful places as Fort Funston and Crissy Field where dogs can burn off energy while their owners get a respite from City living and enjoy California's beautiful coast. What is going to happen to my neighborhood park, Alamo Square, when the amount of land available for off leash recreation within the GGNRA is drastically reduced? No where within the DEIS is this impact even considered. The GGNRA is an urban park and the impact on the surrounding communities when changing park access regulations must be considered. One cannot manage an urban park the same way as a rural park. Dogs, especially in San Francisco, are an urban reality and must be considered when proposing use changes within our open spaces.

Recently, because of the tsunami created by the earthquake in Japan, Ocean Beach, Fort Funston and Crissy Field were closed. This created a severe overcrowding problem at neighborhood dog parks. Stern Grove, in particular, was very hard hit and required a Parking Officer to direct traffic. Needless to say, the City does not have the budget for Parking Officers to control traffic at neighborhood parks. All of the proposed alternative within the DEIS will put more strain on the budget of San Francisco. Like most cities in America, San Francisco is in a budget crisis, many city programs have been cut and the last thing the citizens of this city need is one more unnecessary, avoidable cost.

Why is it that there is no proposed alternative that increases the area within the GGNRA where dogs are allowed to play off leash? Less than 1% of the GGNRA is set aside for dog recreation, if the preferred alternative is approved that number will go down to 0.25%. 1 in 3 families in San Francisco own a dog. We need more space for our dogs to play, not less.

After reviewing the DEIS, none of the alternatives are appealing. A new alternative must be created. One that creates more off leash areas for dogs. It only seems fair that both sides of the issues are presented to the public. By

leaving out a pro-dog alternative, the public is forced to choose between bad and worse.

The wise citizen asks, "Is there another alternative, one that will maintain the status quo or even increase the area where dog recreation is allowed? "

Unfortunately, there is not. Please create a new alternative that champions off leash dog recreation. Then let us comment once again.

Thank you for your time.

Sincerely,

John Delaplane

Correspondence ID: 1268 **Project:** 11759 **Document:** 38106
Received: Mar,15,2011 18:52:10
Correspondence Type: Web Form
Correspondence: This is a huge disappointment. All alternatives presented limit dog friendly areas significantly. Dog friendly areas should be expanded rather than contracted. Any official who votes or approves any part of this measure will surely lose me vote and I will aggressively encourage my friends and neighbors to vote against any elected official who approves any of the alternatives proposed by the GGNRA.

Correspondence ID: 1269 **Project:** 11759 **Document:** 38106
Received: Mar,15,2011 19:04:50
Correspondence Type: Web Form
Correspondence: Specifically, Proposals for Map 3, Homestead Valley:

Strongly advocate for Proposal Map 3-A, designating this area as a voice control zone.

Folks,

We have lived adjacent to GGNRA Parklands and some 50 yards from the Homestead Fire Trail trailhead for 15 years. Proximity to this resource was a primary attraction to us, as was the opportunity to exercise our dogs here. The trail is a meeting place for both local and professional dog walkers, who probably constitute 50% of the trail's users on any given day. Our dogs compel us to get out and appreciate the beauty and privilege of our

proximity to the GGNRA.

Let's remember that this isn't a wilderness preserve or a terrarium -- it's a recreation area with an urban interface. Please continue to permit liberal access by those who use it wisely and most often.

Thank you, Brendan Hickey

Correspondence ID: 1270 **Project:** 11759 **Document:** 38106
Received: Mar,15,2011 20:09:42
Correspondence Type: Web Form
Correspondence: I am an associate editor for Common Ground Magazine and I will be covering this issue in our magazine. I moved to Berkeley because there was so much access to off-leash areas in the East Bay. This is extremely important to my quality of life and my continued decision to stay in Berkeley. If off-leash is restricted, I will likely move away because walking my dog on-leash is less safe for him as other dogs can attack him and he cannot get away. I also can not get as good of exercise with a leash in my hands.

Correspondence ID: 1271 **Project:** 11759 **Document:** 38106
Received: Mar,16,2011 08:59:00
Correspondence Type: Web Form
Correspondence: Dear Decision Makers, The off-leash dog area on the beaches at Chrissy Field is incredibly important to me and my family. We are a no-car family and this park is easily accessible from our home, allowing us to walk there, and then let our dog off leash. There is not another off leash area of this size within walking distance of our home. Please leave the beaches of Chrissy field as seasonal off leash areas. They are incredibly valuable to us.

Thanks Jessica

Correspondence ID: 1272 **Project:** 11759 **Document:** 38106
Received: Mar,16,2011 09:08:18
Correspondence Type: Web Form
Correspondence: Chrissy field currently offers off-leash dog areas which are actively and sustainably used. Please consider the number of people who appropriately take advantage of these areas, and make sure that they can continue to be used in this manner.

Correspondence ID: 1273 **Project:** 11759 **Document:** 38106

Received: Mar,16,2011 09:25:51

Correspondence Type: Web Form

Correspondence: I would like to see more dog free zones created and enforced. My husband is disabled and it is important that he walks. He needs a cane because he is unstable and is easily caused to fall. He fell in the park because he a dog ran up to him and jostled his cane. Luckily he was on a soft surface and suffered no fractures. However, in a slightly different location the outcome would have been much worse. He no longer goes to the park for this reason.

Correspondence ID: 1274 **Project:** 11759 **Document:** 38106

Received: Mar,16,2011 09:26:23

Correspondence Type: Web Form

Correspondence: To whom it may concern.

I've lived in San Francisco for 14 years and can't imagine living anywhere else. This city is my home and I cherish it.

I have owned a dog in San Francisco for 8 of those years. I live within walking distance of several on-leash parks and a bit farther from off-leash alternatives. My dog is not the kind of dog that can go without regular exercise. At roughly 60 pounds, she's very energetic and active. Without daily exercise my personal belongings are in serious jeopardy.

It may seem unreasonable to own an animal like that in the city. Where I in New York I'd probably agree with you. But in San Francsico, a city with more dogs than children, it's not only possible but pleasant. My dog is one of the reasons that I walk so much. Every day I head out and walk a few miles with her. This is part of what makes San Francsico *my* home - I cover a lot of it on foot each day.

The current plan to reduce off-leash dog areas in the city seems wrong headed to me. The city has so many dogs and already there are so few places where it's legal to let them run. The city needs more places not less.

The recent conversion of Duboce Park comes to mind. This park is in the middle of some nice neighborhoods and features a playground, an off leash dog area, and an area that is not for dogs. It's a vibrant part of the neighborhood, a nexus even. A new park side cafe opened around the same time and is thriving. On any given day one can pass through there and see a crowd of people on the benches, with their kids around the playground, and owners with their dogs playing in the dog area (which isn't fenced in but

rather bordered by an open chain rope that implies the dog limited area). This kind of cohabitation *improves* a park area and energizes more citizens to both use it and care for it.

If this plan were more widely circulated - on a city wide ballot initiative or something - I'm certain it wouldn't pass. I only found out about it because of my dog walkers who are some of the most awesome people I know. If the purpose of the parks is to care for the public commons, it makes little sense to me how it can clearly offer less value to the public and be a good plan.

Please reconsider this initiative.

Sincerely, Aaron Newton San Francisco resident since 1997 Dog owner since 2003

P.S. As I stated, I heard about this document via my dog walker. Your options in the form here ask how I would prefer to hear about NPS documents in the future. I wish you would consider a direct mailing (which I realize is expensive). This kind of decision that affects so many citizens needs to be more thoroughly distributed.

Correspondence ID: 1275 **Project:** 11759 **Document:** 38106

Received: Mar,16,2011 14:12:12

Correspondence Type: Web Form

Type:

Correspondence: Hello, On the Sweeney Ridge Notch trail, I encountered two off leash Doberman's that tried to eat my sandwich. This was an egregious off leash violation, among other things. I do not own a dog. Having said that, I would still like to request that on leash dogs be allowed on the Notch trail and Mori point trail. I hike up Milagra and then complete my loop by hiking on Sweeney. It would be nice if dogs could also go on this long loop. I understand that there are endangered species on the Notch, but if the dogs are on leash, is there really a problem? The public may be more accepting of restrictions if they thought the reasons for them were valid.

Forgive me if I'm just being cynical, but is the real reason that some areas are to ban dogs is that the rangers don't want to get out of their cars and hike on the trails?

In any case, could we continue to allow dogs on such trails but have some sort of citizen monitoring to make sure that the ban is really justified? I would be happy to log in my experiences.

Thank you

Correspondence ID: 1276 **Project:** 11759 **Document:** 38106

Received: Mar,16,2011 21:45:17

Correspondence Type: Web Form

Correspondence: Hello, Already we, dog owners are feeling the limits of public spaces where we can bring our dogs on or off leash. These new rules are unbearable. I have a friendly, loving golden retriever who thrives being off leash. He is voiced controlled and a joy to all who meet him(seriously). People light up when they see him and always ask to pet him.

Where can I take him? Hardly anywhere. He is well trained and I am a responsible owner. This is not right.

You nor I own this public land. It should be shared for all to use. Carmel does an excellent job of sharing public space with their dog lovers and non dog lovers. They have specific hours every day when dogs can be OFF leash on the BEACH and other hiking areas/open space areas. I am proposing that these exist in Pacifica(and other areas mentioned). Linda Mar Beach is long enough that the dogs could be restricted to a specific area of the beach.

Cutting off Mori Point and the area by the waster water treatment is unacceptable. This is a lovely area where we take him several times a week. Happy dogs are exercised ones. They are less barky and are well socialized. Dogs are meant to run! If we limit where we can take our dogs(EVEN MORE!) then we will have more problems b/c those areas will become so crowded that there will be more incidents of aggression. The same would exist for people too! Isn't there more crime in cities?

Anyway, we have limited space, it needs to be shared, not just given to one group for their priorities. We, dog owners need MORE not less space. I encourage you to accept a proposal for hours that each group can use the spaces and for dogs to have their off leash time!

Thank you.

Cordially, Marisa

Correspondence ID: 1277 **Project:** 11759 **Document:** 38106

Received: Mar,16,2011 21:57:27

Correspondence Type: Web Form

Correspondence: This should be shared space by all, not just the priority of a few. Please allow our dogs to be OFF leash and on leash in the areas that you are proposing to restrict dogs.

We have these wonderful family pets to enjoy the outdoors with, not just sit at a dog park. My toddler can not walk around a dog park. That is not fun for her. It is healthy for our toddler to be taken on a hike with our dog. She loves him and he loves running. He can not run while on leash. Our backyard is not big enough for him to run.

Fort Funston is already too crowded and over run. We need MORE space, not less.

We want part of the beaches to be off leash every day. I am open to the dogs being leashed at certain times (like peak use times) and say between 8am to 11am it is off leash. 11am to 5pm on leash and 5-7 off leash.

Public land should be shared by all. It is not meant for one group to monopolize the space.

Sweeney Ridge, Mori Point, the area by the waste water plant needs to be off leash too for voice controlled dog.

Sincerely, Anthony George

Correspondence ID: 1278 **Project:** 11759 **Document:** 38106

Received: Mar,16,2011 23:17:25

Correspondence Type: Web Form

Correspondence: As a dog walker and a dog lover, I support leash laws in the GGNRA. I have witnessed many unleashed dogs interfering with wildlife and leaving their pooh throughout the GGNRA. In many parts of the GGNRA, namely on the trails in the Tennessee Valley, I think that dogs should be required to be leashed and not allowed to run free chasing wildlife and damaging native plants.

In addition to dogs chasing wildlife in Tennessee Valley, I've also witnessed dogs chasing birds at Fort Funston and Ocean Beaches and am worried b/c I know that several endangered birds nest in the unfenced dunes that these dogs run through. I think it would be cheap to install fencing around these sand dunes and should be done no matter if dogs are put on leash or not b/c these birds need protection to be able to get their numbers up.

I think that the GGNRA should continue to provide fenced in off-leash areas and perhaps like Prospect Park in Brooklyn arrange specific times for dogs to run free, to manage the growth in dog ownership that occurs when cities increase housing as SF has done.

Thank you for all your hard work!

Sincerely yours,

Shani Heckman

Correspondence ID: 1279 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 00:03:20

Correspondence Type: Web Form

Correspondence: I am an 84 year old resident and home owner in San Francisco. I've lived here for 50 years. For all that time, whatever dog I've had, I've enjoyed off-leash hiking at Fort Funston. Now, because of a physical disability, I use a cane or a walker and have trouble with uneven surfaces. The only way I can exercise my dog now is on the paved path of Sunset Trail. The Preferred Alternative described in the DEIS would exclude me from using Fort Funston in my life-long recreational activity. I believe under the Americans With Disabilities Act, this is illegal. The recommended off-leash areas described in the Preferred Alternative in the DEIS are not accessible to everyone, especially the mobility-impaired. The document needs to be revised to address and evaluate how the Preferred Alternative will impact mobility-impaired dog owners.

Correspondence ID: 1280 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 00:29:37

Correspondence Type: Web Form

Correspondence: On page 228 of the DEIS, the extent of ocean pollution is discussed in relation to dog feces. No evidence is given that the ocean is polluted at all at Ocean Beach. To the contrary, the document describes "all beaches in San Francisco county except Baker Beach exhibited excellent water quality in 2008." (p. 228, para. 4) DEIS states that "runoff from creeks, rivers, or storm drains is the largest source of pollution to California beaches. (para. 1) The DEIS does not reconcile those statements with the conclusion: "A substudy of the San Francisco Sewage Master Plan determined that bacterial contamination of waters off Ocean Beach was significant due to dog fecal matter deposited along the shoreline." (p. 225, para.5) The document does not explain why the latter substudy contradicts the former reports. The document fails to show the evidence that substudy provided and how that evidence was collected. The document fails to analyze the impact of other sources of pollution, like the sewage treatment plant at Fort Funston, garbage from people thrown on the beach, horse manure, oil spills in the bay, chemical pollution from runoffs from creeks and rivers, and the dead seals, fish, and seagulls left to rot on the beach by GGNRA. The document

should analyze the effect of all this contamination on swimmers, children wading, and surfers, and explain why GGNRA has not issued warnings or restrictions against being in polluted waters, if, in fact, the waters are polluted. It seems like the GGNRA is manufacturing excuses to ban off-leash dogs from the mere 1% of the parks they now enjoy. The charge that dog feces are polluting the ocean is very disingenuous indeed, and give rise to distrust in me of GGNRA and its motives.

Correspondence ID: 1281 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 00:46:25

Correspondence Type: Web Form

Correspondence: This poison pill that will allow the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions will not work. The change would be permanent. A management plan should not come with a built-in nuclear option, which is what this is. It allows a relatively few bad players to undermine and destroy a traditional recreational use of the area. No number of responsible dog owners will stop what will become the inexorable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. Tens or hundreds of thousands of hours of incident-free dog walking will not matter. There should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status can be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined ? by volunteers biased against dogs? by surveillance cameras? ? is not included in the DEIS.

Correspondence ID: 1282 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 08:41:52

Correspondence Type: Web Form

Correspondence: I attended the public meeting at S.F. State earlier this month. In my discussions with GGNRA staff, they mentioned dog behaviors that were unwelcome -- namely digging, chasing birds and and disturbing habitat areas. My dog walks unleashed at Fort Funston, and she does not engage in these behaviors.

By requiring all dogs to be on a leash in most areas of Fort Funston, you are punishing all dogs and all dog owners for the actions of a few. Please focus your enforcement efforts on these behaviors and not on the leashed versus

unleashed issue. Yes, national parks require dogs to be on a leash, but Fort Funston has always been a special case and it should remain so.

Thank you,

Connie Vickroy

Correspondence ID: 1283 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 10:02:56

Correspondence Type: Web Form

Correspondence: Since I got my dog Jake last year, he has lost 5 pounds, and I have lost 30 -- and kept it off. Dogs provide some of us less motivated people the energy and excuse to walk and hike every day. If you limit the areas that we can take dogs this is limiting our means of exercise. As a woman I would never go on these long hikes alone. I feel safer knowing that Jake is there to protect me.

If people are not given a reasonable amount of space to take their dogs, they will be forced to take them at unpredictable times to unpredictable places -- places that people who are not comfortable with dogs may not like. Providing places for dogs to run and continue their exercise keeps them off bike trails and hiking trails for people without dogs.

Please reconsider your plan and take in to account the many dog lovers in the area -- we need a place for our dogs to go!

Correspondence ID: 1284 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 11:27:08

Correspondence Type: Web Form

Correspondence: I read that it will take one million dollars a year to enforce the so-called "Preferred" plan! One Million dollars a year at a time when all agencies and people are short on cash. One Million dollars to criminalize current law-abiding, open-space loving park users. One million dollars a year of PUBLIC money to PREVENT the PUBLIC from using PUBLIC land. One Million dollars a year to turn me into a criminal when all wanted to do was have a walk with my on-leash dog.

Perhaps the Park Service should use the one million dollars a year to provide, not prevent, the public access to public land!

The reported is deeply flawed on many levels. Why is the Park Service going to use my money to prevent me and my law-abiding on-leash dog

from accessing almost all the areas in and around Pacifica that I currently use? Why is Sweeny Ridge now totally off limits? This is a heavily impacted site with a long history of dog use. Why are New lands all, by default, "NO DOGS!?" There are almost no sites near Pacifica that allow on-leash dog access -- enacting the "Preferred" plan would remove most of the remaining ones. And why are the broad open trails perfect for dog-walking in the Marin Headlines excluded? This must change.

Unbalanced in the extreme. Enforcing the "Preferred" alternative will waste even more of my money to exclude me from my public lands.

Perhaps the Park Service needs to ask itself what its purpose in life is? Provide Access, or prevent it? And if the answer really is to provide access, then please try and do a better job than the near total blanket dog-ban proposed in this so-called "report". Consider the needs of the people that MOST OFTEN use the parks -- do not force the huge numbers of on-leash dog-walkers onto a tiny minority of over-used trails.

Correspondence ID: 1285 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 11:32:47

Correspondence Type: Web Form

Correspondence: It would appear that the main argument for preventing dogs from using almost all areas of the GGNRA is that there might be the occasional problem with the dogs behavior.

That argument is exactly the same as saying we should prevent all cars and drivers from using all roads simply because we know one day an accident will harm a pedestrian.

The arguments in this "environmental" report are the most nonsensical pseudo-scientific garbage I have ever read. Government interference gone wild.

Rip it up and start again please. Let's try and use some logic, science, statistics, and balance in the next draft. Thanks.

Correspondence ID: 1286 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 11:45:04

Correspondence Type: Web Form

Correspondence: My "Preferred Alternative"? Stop wasting all this public time and money and leave things exactly as they are. It works just fine, compared to the alternatives. Thanks.

Correspondence ID: 1287 **Project:** 11759 **Document:** 38106
Received: Mar,17,2011 13:14:55
Correspondence Type: Web Form
Correspondence: WOW what a nice spot but the trails are full of dog crap this is too nice of a place to allow dogs to crap all over what a waste!

Correspondence ID: 1288 **Project:** 11759 **Document:** 38106
Received: Mar,17,2011 14:08:23
Correspondence Type: Web Form
Correspondence: I support the most restrictive plan you've offered. If it were up to me, dogs wouldn't be in GGNRA at all. In my home town, we banned dogs from our beautiful Lithia Park, and it was just night and day, so much better! Complaints, confrontations, etc. all pretty much disappeared. Dog owners grumbled, but even they came to see the benefits in time, and now it is not a problem. In our town, dog owners have plenty of places to walk their dogs (on leash), and a couple of fenced areas to let them run free. Dogs are great in the right setting, (I grew up with dogs and have owned several), but in a place where wildlife, solitude, lots of people and kids are around they really don't belong. If they have to be allowed, they should, at the absolute minimum, be restricted to a few fenced areas if off leash, and definitely on leash wherever allowed, and the total area where they are allowed should be tiny.

GGNRA was not established to be a giant dog run or dog's toilet. There is more to the animal kingdom than dogs, and part of GGNRA's mission to to protect the wildlife that lives there. It would benefit all human visitors, and our animal cousin residents, if dogs were banned, or if not banned completely, severely restricted.

Good luck! This is not an easy subject for you I'm sure.

Correspondence ID: 1289 **Project:** 11759 **Document:** 38106
Received: Mar,17,2011 15:38:30
Correspondence Type: Web Form
Correspondence: To: Frank Dean Re: GGNRA Draft Dog Mgt Plan

A review of the plan and related information/websites leads to a simple solution for this complex issue: Let sleeping dogs lie.

A host of reasonable, inexpensive and easy to administer changes have been proposed by interested groups supporting continuation of existing dog walking and off-leash parameters. These should be pursued, rather than the proposals recommended in the plan. The plan's proposals would adversely impact the experience of one set of users (dog owners), even though their numbers have grown and they pay the same taxes and fees as everyone else. We need and deserve a plan that treats all users equally.

Regards,

Correspondence ID: 1290 **Project:** 11759 **Document:** 38106

Received:

Mar,17,2011 15:54:20

Correspondence Type:

Web Form

Correspondence:

I am writing to acknowledge my support to continuing the off-leash policy for dogs that currently exists at Fort Funston, in San Francisco. Fort Funston is unique in that it allows dogs the chance to run and roam freely. With no place else like it within many miles of San Francisco, dog owners will be denied the opportunity to exercise their dogs in a place that has successfully been used for this purpose for many years. Also, as a man who walks his dog everyday and in all kinds of weather at Fort Funston, I can attest to the emptiness of this beautiful park on many days of the year by any persons who are not walking dogs. Indeed, there are numerous days during the year when I can count on my two hands the number of people I see walking along the cliffs and beaches here. Denying San Franciscans and their dogs this liberty strikes me as more punitive than stemming from any real grievance regarding nature's balance at Fort Funston- whatever others might claim.

Correspondence ID: 1291 **Project:** 11759 **Document:** 38106

Received:

Mar,17,2011 16:52:45

Correspondence Type:

Web Form

Correspondence:

Last year my husband was attacked by 2 unleashed Huskies while we were hiking on Bolinas Ridge. Of course, the owner grabbed his dogs and ran away when he saw my husband's arm bleeding. So I have absolutely no sympathy for dog owners regarding this issue. Just yesterday, 3/16/11, we were walking at Crissy Field and saw one dog walker with 10 dogs. We then saw another dog walker with 6 dogs. Both within a few minutes of each other. We saw one of the 6 dogs poop and the dog walker just kept going. We also saw a Great Dane running, unleashed, along a planted area chasing some Egrets. In fact, we noticed quite a few dogs, mostly unleashed, running uncontrollably chasing whatever was in their path. It made the visit unpleasant because we had to worry that someone's dog or dogs might jump

at us. It was also disgusting to see dogs poop, creating a health hazard, and the owners just walk away creating. At no time did we notice any dog owner/walker pick up after their dog(s). By the way, this was in the area that was supposed to be the protected area. It's both our opinion that dogs do not belong in any of our parks leashed or unleashed. Period. They are destructive and, quite frankly, a nuisance. We both hike quite a bit and have witnessed on many occasions dogs either chasing after or attacking various wildlife. We both realize that the owners are directly responsible for the problems their dogs create. It's a privilege, not a right, to have access to our open space areas. We both think dog owners, for the most part, are disrespectful of the rights of others to enjoy our parks. And they are especially disrespectful and dismissive of the rights of the wildlife that need these areas to thrive. Thank you.

Correspondence ID: 1292 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 21:59:47

Correspondence Type: Web Form

Type:

Correspondence: As a San Francisco resident living within walking distance of GGNRA land, I have seen the degradation of park lands and the peril put on wildlife from dogs and their owners. Every visit to Ocean Beach, I see countless off leash dogs chasing birds and owners either not caring or oblivious. I see dogs pooping in the sand, with no owner in sight to clean it up. I won't even visit Fort Funston anymore because I hate to see the land erosion caused by dogs rampaging off leash. My husband, Doug Kerr and I vote on Option D, the most restrictive and protecting of wildlife and environment.

I'd also like to comment on fires at the beach, which I oppose. Ocean Beach is filthy from fires. Fires do not stay within the rings, and people have fires outside the rings all the time. If it were just wood, it still would be bad for air quality. I regularly see people burning palettes and even sofas. Why can't San Francisco have regulations like Southern CA, where fires are banned on beaches and the quality of sand is clean and nice enough to lay on.

Correspondence ID: 1293 **Project:** 11759 **Document:** 38106

Received: Mar,18,2011 01:06:36

Correspondence Type: Web Form

Type:

Correspondence: I own one, elderly dog. We walk her regularly and always keep her on a leash. She has obedience training, all of her shots, and, temperamentally, is a quiet animal. Each day we meet people on the trail walking their dogs. We often stop and talk. Most of the people we meet carry bags to pick up after their dogs. We also carry bags for the same reason. There are containers left to deposit the bags in. We use them. Mori point is posted with signs warning

visitors to beware of coyotes which are running wild. Coyotes hunt the other wild animals for food, defecate where ever they happen to be, are not trained, have not had any shots or vet care that I am aware of. They are, in fact, canines. There are also deer, bunnies, hawks, an occassional mountain lion and lots and lots of skunks. None are cared for in the slightest, all carry disease, none have had shots and they all defecate.

Yet our pets are perceived as a threat to people, the environment, and all of the animals in it? So much so that we have to spend money to study the environmental impact of one kind of animal, a dog. We have to modify rules already in existance because one type of animal, a dog, is owned and cared for by a private person?

I also have heard that some people who like to walk through the parks that are, hopefully, teeming with wild animals are afraid of the dogs. The current rules are enough. This effort is a waste of money that we, as a society, do not have and would be better spent improving things for all of us.

Correspondence ID: 1294 **Project:** 11759 **Document:** 38106

Received: Mar,18,2011 06:35:47

Correspondence Type: Web Form

Correspondence: A park is not a storage place for nature. A park is meant to be enjoyed. A park is open space to run and play. For those of us confined in small confined man-made spaces all day it is a place to experience the sights and sounds of nature, breathe fresh air. Just like people dogs need parks, actually they need them even more. Dogs need to be able to run around freely and socialize with other dogs. They are fenced in all the time within their dwellings with their humans, don't fence them in at a national park.

Yes, dogs do damage to parks. So do children. So do adults. I have seen many more children digging on a beach than I have ever seen dogs do. Dogs sniff flowers and grass, sure they may nibble at them sometimes but people and children can do more damage when picking flowers or pulling out plants. People and animals need to be able to enjoy nature as nature but also need to respect it. A well behaved dog with a responsible dog owner respects the park s/he is in.

One way a responsible dog owner maintains their dogs good behavior is to give her/him plenty of exercise. With so many of us dog owners we need more space to do this, not less.

Thank you.

Correspondence 1295 **Project:** 11759 **Document:** 38106

ID:

Received: Jan,31,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Please see my email conversation with a former member of PROSAC from 2009. It is an interesting discussion given my view as a human and hers as a dog lover. Her final suggestion to me is that the solution to the unfair situation of dogs off leash everywhere can be solved by my SUICIDE. I think her attitude, while shocking, accurately describes the view of many dog owners.

Thank you for your time and for considering this issue. I don't believe this type of behavior should be rewarded with lax laws and continued off leash areas. I would suggest enforcing the new (and old) leash laws with tickets that are difficult to contest. The revenue from these tickets should more than pay for patrols.

Mon, Jun 15, 2009:

Hello Felicia,

Thank you for your thoughtful response. I appreciate the time you took to consider my experiences and express your own. I think people that are comfortable with dogs have a different experience than people who are uncomfortable with dogs. I have also noticed that runners tend to have dogs come up to them much more frequently than non-runners. A dog owner once explained to me that dogs think you want to play with them if you run past them. I can't tell the difference between a dog that wants to play with me and a threatening dog. This may explain some of our different experiences.

I think you might be aware that San Francisco actually has the greatest area of unleashed space for dogs as compared to any other city in america. (this is not counting of course all the area that people choose to use as unleashed space) It baffles me why it is that dog owners complain of not enough space for their dogs. I fully support keeping the current unleashed areas (but not increasing the area) for dogs to play and as I said choose not to go to those places. For examples, I used to love running in Mountain Lake but no longer run there as it is an unleashed area. I agree that compromise is necessary and I am open to discussion with every dog owner I encounter if they are open to discussion.

As for native plant advocates, I can't really speak to that. I am not sure what their experiences have been but will look into that.

Thanks again for your response!

Wed, Jun 17, 2009:

Hello Felicia,

Thanks for your advise. Yes, you are right that I am not comfortable with dogs. I actually have tried to not show fear or change my feelings but it is not quite that simple. At this point, I can't expend any more energy trying to change myself. I really do believe that it is San Francisco's responsibility to provide recreational areas for those of us who do not want to encounter off leash dogs. At this time, there is no such area due to dog owners purposefully disobeying the law and acts of intimidation against those of us who speak up. If I were to bring well- trained de-fanged rattlesnakes to the park, I'm sure some people would be afraid and ask me to leash my rattlesnakes. And I would, because I respect people and Their differences.

Just today, I approached the dog walker who had threatened me about a week ago and asked her to sit down with me to talk. I'm willing to compromise and while it would be easier for her to just obey the law, I'm asking her to leash her dogs when I pass. She refused to talk yet again. And actually laughed when I jumped in response to her dogs barking at me. I will not stop running where I am allowed to run and therefore with continue to be treated with disrespect and disregard. So all I can do with these particular professional dog walkers is to continue to defend myself and try to avoid further confrontation. And at some point I hope that the law will be enforced.

This obviously is an issue with strong opinions on both sides and for various reasons. It doesn't seem like a resolution is near but I think there needs to be more open discussion and a safe place for everyone to share their opinion. It has been very difficult for me to confront these dog walkers and I am proud of myself for finally standing up for my rights. Hope you're having a good day!

Thu, Jun 18, 2009:

Hello Felicia,

Thanks again for taking all this time to talk with me. I do realize that our country is in trouble financially and that park patrol may not be possible for years and years. But for me I've been dealing with this for years upon years and for those years have been silenced by intimidation. In short, I'm definitely thinking long term. I agree that it's sad that we need to spend money when it seems like people should just be obeying the law. Just to put it out there, tickets could bring in revenue in order to pay for the extra patrols. One person gets bitten by a dog everyday in San Francisco, so dogs aren't exactly safe. The dog that bit me in the Presidio was barking at me

and not bearing its teeth or behaving in any of the ways you described. And on a bit of a separate point, the facts are that even other dog owners have problems with the professional dog walkers. Again, I find it difficult to understand the difference between me bringing well-trained de-fanged rattlesnakes to the park and dog walkers bringing their dogs to the park. What are your thoughts?

I'm not sure you understand quite how I feel and what I've been through. Let me try to help you understand with an analogy. You can compare it to going to war. Many of the men who fight for our country are never quite the same despite trying to get back to normal. I feel like that has been my experience. I love animals, but am scared of dogs. I don't hate dogs but I don't wish to interact or ever come near a leashed dog. There are many people who feel the same. We are the minority, but we deserve the right to recreate too! Don't you agree? I realize that banning dogs all together would make people unhappy. So I think a reasonable compromise is to have leashed areas where I and the many others who also feel strongly about this are allowed to go without fear.

I am asking PROSAC to provide a safe place for discussion. Please consider setting up meetings to discuss this issue of dogs for all of San Francisco's recreation areas.

Here's to a future of mutual understanding and protection of a silenced minority!

Correspondence ID: 1296 **Project:** 11759 **Document:** 38106
Received: Mar,18,2011 11:30:32
Correspondence Type: Web Form
Correspondence: I oppose the decrease in off-leash areas in the GGNRA.

As a doctorally prepared nurse, I know that keeping the parks friendly to dogs is one of best public health policies to improve public health outcomes. The decrease in off-leash space is threat to that relationship and should not be pushed forward.

By merely caring for their pets, dog owners exercise more than the general population. Walking is the most recommended form of exercise for adults and seniors. In addition, the relationship between dog and owner enhances mental health outcomes. Owners and dogs care for each. A dog is always welcoming when you come home!

As a dog owner, I hike off leash at least once a week in Redwood Regional Park in Oakland. It is a wonderful experience for me and for my dog. Not

only we get great exercise, we also enjoy the beauty of the place.

During my 8 years visiting Redwood Park on a weekly bases, I have come to believe that the multi-user parks are important to keep. At redwood, bicyclist, hikers, campers, families and dog owners - all get along. The fact that there are so many interests, folks are flexible and nice about inconveniences. When you are there, you know you have to share the rode and you do just that gracefully. You become more tolerant.

As a resident of the Bay Area for 27 years, I ask for continue flexibility and inclusion in the regulations of the park - a hallmark of our local culture.

Please do not restrict the use of the Park by private citizens and their dogs.

Thank you for taking may opinions in consideration.

Sincerely

Michelle Tellez RN. MS. PhD.

Correspondence ID: 1297 **Project:** 11759 **Document:** 38106

Received: Mar,18,2011 12:16:32

Correspondence Type: Web Form

Correspondence: I have been walking our dogs for years in the GGNRA, where it is permissible. I have never, never seen disruption by dogs, while citizens are walking their dogs. I have seen where trails are littered with horse manure. I have read about illegal drugs being farmed in our National Parks. I have read about wild animal poaching in our National Parks. I have read of rapes and murders in our National Parks. I feel safe when I have my dog with me. Dogs, like other animals are an integral part of our world. Personally, I feel that our tax payers money could be going towards preventing the things that I listed in paragraph two, not banning dogs from our National Park Lands. I have seen frequently seen Rangers in the Marin Headlands going after people that do not have their dog on a leash. I do agree that people should follow the rules, but I wonder how much time and expense the Rangers efforts cost the tax payer. In short, I think that the NPS should have the correct priorities. Respectfully yours, Sonja Dohse

Correspondence ID: 1298 **Project:** 11759 **Document:** 38106

Received: Mar,18,2011 12:25:08

Correspondence Type: Web Form

Correspondence: I am writing to say that I DO NOT SUPPORT the under handed efforts of

the National Park Service to remove the designation "RECREATION" from the name of the Golden Gate National Recreation Area. These lands exist in an urban area and were intended for the recreational use of the citizens and taxpayers of San Francisco, San Mateo and Marin. I OPPOSE the renaming of the GGNRA. It was never intended to be a pristine wilderness or sanctuary.

I OPPOSE the currently proposed "Dog Management Plan"

I am 69 years old and I walk with a cane. I cannot walk in sand or up and down sand dunes. The GGNRA "Dog Management Plan" denies me access to off-leash dog walking and does nothing specific to address problems of anti-social dog owners and/or individuals with multiple animals.

Clearly, it is the intention of this plan to inhibit (and eventually terminate) our freedom to walk with off-leash dogs anywhere in the area.

I have been in relationship to the GGNRA lands (particularly Ft. Funston) long before they were GGNRA. The currently proposed Dog Management Plan threatens to cut off my access to this fabulous urban recreational resource and one of the most important and beneficial aspects of my life. To me the resolution of this Dog Management Plan is a matter of life and death.

Correspondence ID: 1299 **Project:** 11759 **Document:** 38106
Received: Mar,18,2011 13:24:53
Correspondence Type: Web Form
Correspondence: I am writing to request that the Ft. Funston off-leash area for dogs to remain as is today. Ft. Funston is enjoyed as is by many including those of us with dogs. The dog walking community does an excellent job keeping Funston clean and we respect all (people, native plants and other animals) who call the park a home or home away from home. Reducing or eliminating open spaces for all San Franciscans to enjoy would be a serious mistake. Thank you. -shawn

Correspondence ID: 1300 **Project:** 11759 **Document:** 38106
Received: Mar,18,2011 13:32:33
Correspondence Type: Web Form
Correspondence: To Whom It May Concern:

My roommate and I are both active community members. I am a plaintiffs' attorney and my roommate runs a small marketing agency in downtown San Francisco. We have lived in San Francisco for 5 years. Together we rescued

a 1-year old mixed-breed from ACC in February of 2010. Her previous owner had abandoned her and two other dogs at the shelter earlier that year. When we took her to the veterinarian to get her shots, we were told that because she is a younger dog, she needs a lot of exercise - at least one hour per day if possible.

This advice turned out to be great not only for our dog, Honey Belle, but also for us! We live in the Sunset District of San Francisco, so luckily for us we are close to both Ocean Beach and Ft. Funston - and Honey Belle gets almost daily walks off-leash at one or both of those places. The joy on her face when we finally come within designated areas and clip off the leash is indescribable. She happily trots in circles around us, bounds ahead to sniff at the grass and shrubs, and thoroughly enjoys her time socializing with other dogs. Since we spend the work day enslaved at our desks, we also enjoy our recreational time immensely.

Being dog owners has allowed us to finally get off the couch and explore this great city and all the beautiful outdoor adventure land that is available to us and our beloved dog, and helped make the decision to stay in San Francisco an easy decision. We have hiked in the Marin headlands, Glen Park, Ocean Beach, and Ft. Funston, among other areas. We choose these recreational areas specifically because they allow our dog to get off-leash exercise.

I urge you to consider the health and well-being of not only this city's canine population, but also its human citizenry as well, before allowing this atrocious law to pass. Currently, GGNRA only allows off-leash dog walking in less than one percent (1%) of its total area. The drastic restrictions that are proposed are preposterous and a thinly-disguised attempt to raise revenue through ticketing of people who MUST allow their dogs to get off-leash exercise or risk ill-behavior and other negative consequences. These beautiful areas were specifically designated as recreational area for the citizens to enjoy outdoor activity, and should remain that way forever.

Sincerely, Elina Agnoli

Correspondence ID: 1301 **Project:** 11759 **Document:** 38106
Received: Mar,18,2011 13:58:19
Correspondence Type: Web Form
Correspondence: Muir Beach is one of the few places dogs are allowed to go and just be dogs. I'm not a dog owner, but I do live here and visit the beach regularly. The dogs look very happy when here and they rarely cause trouble. Watching them makes me happy too! Perhaps if Muir Beach was very congested, and dog owners weren't picking up after their dogs I would have a different

opinion on the matter, but this is not the case. Most people bringing their dogs to the beach live here in the community, and know how to be respectful of the surrounding environment. Muir Beach is small and usually very quiet with few people on the beach most days of the week. I'm writing a request that you continue to allow dogs on Muir Beach.

Sincerely, Muir Beach Resident

Correspondence ID: 1302 **Project:** 11759 **Document:** 38106
Received: Mar,18,2011 16:18:33
Correspondence Type: Web Form
Correspondence: Please do not give in on the leash issue. Habitat protection is far more important than the complaining of the vocal dogs-should-run-everywhere minority.

Correspondence ID: 1303 **Project:** 11759 **Document:** 38106
Received: Mar,18,2011 16:26:43
Correspondence Type: Web Form
Correspondence: Sirs/Madams: I speak not only as a Golden Gate Audubon Society member but also as a former dog owner who remains very fond of dogs. With regard to the GGNRA Dog Management Plan/DEIS, I support Alternative D, or as a second choice, Alternative C. I believe these alternatives provide appropriate balance between dog-related recreation and essential protection of wildlife and preservation of the GGNRA environment.

Thank you for your consideration. - Loring Dales, MD

Correspondence ID: 1304 **Project:** 11759 **Document:** 38106
Received: Mar,18,2011 19:24:00
Correspondence Type: Web Form
Correspondence: I support this management plan as proposed and the protection of natural resources for wildlife use. Thank you.

Correspondence ID: 1305 **Project:** 11759 **Document:** 38106
Received: Mar,18,2011 23:04:08
Correspondence Type: Web Form
Correspondence: As an owner of an unruly, aggressive dog, I would LOVE to see leash laws enacted and enforced. Too often we have bad encounters because people

have their dogs off leash. More often than not, these off-leash dogs come barreling down the trail straight toward us and end up harassing my on-leash dog. And then WE get yelled at for having an aggressive dog. Hey folks, we know our dog has issues, that's why he's on a leash. If your dog can't listen and play nice (which is true for most of them), then they need to be leashed. Enacting and enforcing a leash law will keep everybody safe.

Also, off-leash dogs tend to run everywhere, thus disturbing wildlife and ruining the plant life. We stay on trails to protect nature, so it stands to reason that our dogs should too.

Sincerely,

Amanda F. Thompson

Correspondence ID: 1306 **Project:** 11759 **Document:** 38106

Received: Mar,18,2011 23:22:38

Correspondence Type: Web Form

Correspondence: In the winter I travel across the bridge 2-4 times a week to take my dogs to Fort Funston. I love it because it's off leash and they are able to run out their energy and frolic in the ocean. I've met many wonderful people and great pets during this time. Everyone is very respectful of the habitat, cleaning up after themselves, and having good doggy manners. I've seen many more dog fights at Pt Isabel then I ever have at Fort Funston (I've seen none at Fort Funston). I'm at a loss for why such severe restrictions would come down when there is no cause. I shop in SF when I come over, I pay a bridge toll - I'm injecting cash into a city I don't live in- all for my dogs. If Fort Funston is restricted, I will no longer come over; as a consequence, my money will then stay in the East Bay.

These restrictions make no sense at Fort Funston, no sense at all. Please keep things how they are now.

Thank you Rebecca (Harley & Zeze)

Correspondence ID: 1307 **Project:** 11759 **Document:** 38106

Received: Mar,19,2011 07:55:55

Correspondence Type: Web Form

Correspondence: I am a dog owner. Infact I own and walk 3 dogs. I am a dog walker at Guide Dogs for thr Blind in San Rafael. So I speak from much expirience. Dogs need to be leashed in a enviroment where others (dogs and humans) share. There is too much room for mishap when they run wild. I live where a levee is and

a dog off lesh jumped over the levee to chase a duck and got stuck in the mud. The owner tried to help rescue the dog and got stuck herself. This required the Police and Fire department to respond. A big waste of our tax dollars. The area is posted dogs on leash but many people do not comply to the posting. This is an example of what happens when domestic dogs are left to run wild. They are not safe because they have been domesticated. When a person walks down the street with their dog off leash and a cat or some other animal runs by they instincally take chase. I witnessed a dog in Fairfax get hit and killed by a car this way and the owner called out a command to the dog to no avail. The GGNRA has many delicate plants and animals that can be ruined by dogs running wild. As I said before I am a dog owner and walker and I have no problem what so ever walking my dogs on leash. In fact for their safety and the publics I do this. I take them to dog parks to run wild for fun and exercise. People who allow their dogs off leash are ignorent to the dangers or they would not do it. Unless they feel they are intitled and that is a whole different problem in society today. Thank You William Aldrich

Correspondence ID: 1308 **Project:** 11759 **Document:** 38106

Received: Mar,19,2011 09:54:02

Correspondence Type: Web Form

Correspondence: I live within 2 miles of the Oakwood Valley trailhead and walk there with my dog at least once every weekend. In the 9 years I have lived here, I have never had a problem with anyone else's dog or had anyone have a problem with mine at this trail. It is very heavily used by those of us who live in the area, and we don't understand the need to make any changes here. I have not seen it to be a problem, but if you put a waste disposal can at the intersection of the fire road and the trail, it would probably improve dog waste pick-up if thats an issue.

I also noticed that in some of the alternatives, you allow no dogs on the link to Alta trail portion where dogs are allowed. Please dont do this - it is great to able to be take a nice loop hike, and when you eliminate linkages between dog allowed areas, it takes a lot of fun out of it. There are a number of trails I never hike on because there is no way to do a loop hike.

Mori Point - I took my dog there recently with my niece and nephew for a hike, largely because no dogs are allowed in the county parks there, even leashed. Please dont eliminate one of the few places people can actually hike in that county with their dogs. Fortunately, Marin County has more options, but by stringently reducing where dogs can be allowed and voice control areas, you are putting that much more pressure on areas where dogs are allowed and increasing the liklihood of problems there.

Crissy Field - I have no issues with all walking paths being restricted on leash. This is a great place, but after a couple of visits, I would never bring my dog there again unless very early am - way too many people to have to manage a pet. Muir Beach - I think a better solution with the beach area is to restrict dogs to certain hours - say before 10am and after 7pm. It is easier to enforce and provides a balance for the different stakeholders.

GGNRA is a recreation area, which means one of its purposes is for humans to use it for recreation - it is not a pristine wilderness. It is already severely restricted in allowing dog access (to the point where I almost never use it), so unless there is some compelling problem to be solved with regards to conflict between users or significant wildlife issues, you should refrain from additional restrictions. When new restrictions are needed, they should be targeted to solving these problems - so changes at Crissy Field make perfect sense, but not Oakwood Valley, for example.

Thank you.

Correspondence ID: 1309 **Project:** 11759 **Document:** 38106
Received: Mar,19,2011 12:11:57
Correspondence Type: Web Form
Correspondence: First of all, our dogs are our children. 99% of dog owners are citizens that only pay into our financial system. We don't use welfare, food stamps, headstart, Medical, etc...All we ask is for a place for our children(dogs) to be able to run free for 15 minutes. Even the heaviest of the dogs do not do as much damage as a man who weighs 250 pounds, because the weight is distributed on four legs. I suggest that along with your ban on dogs, ban all human beings that weigh more than 200 pounds . Also, please shoot all bicyclists that ride in your pristine land. Not only they do not obey any traffic signs, they totally disregard any human and canine beings that cross their path. Instead of banning dogs, why don't you enforce laws such as dog licenses fees, vaccination proof and require that vicious dogs wear muzzles? San Francisco is a city full of young residents who have dogs, do you want them to leave the city because there is no place for their dogs? Of course, you don't care, you are federa!!!!

Correspondence ID: 1310 **Project:** 11759 **Document:** 38106
Received: Mar,19,2011 12:15:31
Correspondence Type: Web Form
Correspondence: Dear GGNRA, As a lifetime, almost daily user of the GGNRA's magnificent lands, hiker, biker, and former dogwalker, I implore you to pursue option A. I find professional dogwalkers to be more responsible than ever before,

mostly insured, and generally in great control of their dogs. It is not in their interest to have conflict and they go to great length to be responsible. Option A leaves enormous areas wide open to those who specifically wish to avoid users with dogs. As someone who uses the GGNRA in most modes, in most places, over 35 years, I believe that user complaints against other user groups are almost universally based on intolerance rather than actual threat or safety. As a recreation area the GGNRA should encourage user-ship by all groups. I see no reason why a person should not be allowed to walk their companion dog absolutely anywhere on leash. Reading parts of these massive documents I am struck by the bureaucratic waste of resources which could have been better spent doing actual conservation, teaching, or other work in the GGNRA and supplied jobs to people who choose not to become lawyers. Thank You your consideration, Mark Diehnel

Correspondence ID: 1311 **Project:** 11759 **Document:** 38106

Received: Mar,19,2011 13:46:33

Correspondence Type: Web Form

Type:

Correspondence: The National Park Service is running amok out here in West Marin County. First, nefarious methods are used to discredit the Drake's Bay Oyster Company's excellent aquaculture operation, and now you are trying to take away the limited areas we citizens have to walk our dogs. You are making a large number of law abiding citizens furious with your nazi-like lust for power and control. Will you stop at nothing? Dog walking is a healthy, innocent way for taxpyers to enjoy thier parks and keep themselves healthy. Pets are a good thing, but you seem to be hell bent on making it evil and anti-environment. I consider myself an environmentalist. Both my children went to UC Santa Cruz and graduated with degrees in environmental science. You would be well advised to loosen the noose and take your fingers out of this pie. You don't need to engender more rage from the people of Marin county.

Correspondence ID: 1312 **Project:** 11759 **Document:** 38106

Received: Mar,19,2011 17:32:46

Correspondence Type: Web Form

Type:

Correspondence: As a long time citizen of Pacifica, and a dog lover/owner, I feel that it is impairative for the guide lines set for dog owners who wish to walk/excercise their dogs be follow to the letter. It is the more sensible and safest way that will not only protect your dog, but also could protect a child or adult. So anyone who really cares about their dog/dogs should have no problem following these rules set for obvious reasons, and so we can have an open space to exercise our animals. People have a right to feel that their dog will be safe and not be attached by another dog. Not all dogs get alone

with each other, anyone with any brains should know that. This is why we have a LEASH LAW in this city.

Correspondence ID: 1313 **Project:** 11759 **Document:** 38106

Received: Mar,19,2011 18:52:51

Correspondence Type: Web Form

Correspondence: As a long time resident of Marin County and the owner of two dogs, both of whom are trained with both hand and voice commands, I am not in support of the draconian, anti-dog laws under consideration. There are so few places left for dogs to run free, it is unfair to limit them to leashes on paved streets. Obviously they can not have unfettered access to every place, but those that are currently available (North Stinson, Rodeo Beach etc.) are wonderful for dogs and dog owners, people who like dogs.

There are so many places that people have access to that prohibit dogs, so please let the last remaining places that are currently dog friendly be allowed to stay.

BTW: There are scientists, throughout the world, who have determined that the evolution of mankind owes much to the domestication of the dog. It seems less evolved people managed to leave with dogs - without leashing them.

We are starting to ban so much, no biking, no dogs, no walking, no thinking. For once, let's have some sanity and accept that we can co-exist with dogs and people, peacefully and with respect for one-another and the environment.

Correspondence ID: 1314 **Project:** 11759 **Document:** 38106

Received: Mar,19,2011 19:09:47

Correspondence Type: Web Form

Correspondence: Please protect natural areas for wildlife use by limiting the places where dogs are allowed to roam (for example, not allowing dogs on beaches that have endangered nesting Snowy Plovers). There are enough other places that dogs can be. The wildlife will be endangered if this protection is not done.

Correspondence ID: 1315 **Project:** 11759 **Document:** 38106

Received: Mar,19,2011 19:15:18

Correspondence Type: Web Form

Correspondence: To whom this may concern I have been a resident of Pacifica for 42years and I have lived in Fairway area since 1982 near Mori point I have always walked my dogs there I pick up after them, to me this is a safe place to walk them, plus they get some freedom. With all the traffic in Pacifica its difficult to find places to walk dogs without having to worry about them getting hit by a car.Mori Point is a perfect area to walk them without having to worry about this problem. Thank you for your time.

Correspondence ID: 1316 **Project:** 11759 **Document:** 38106

Received: Mar,19,2011 20:17:26

Correspondence Type: Web Form

Correspondence: I am deeply concerned about the proposed plan and further restrictions to the availability of off-lease areas in San Francisco. I am a 30 year resident of San Francisco and my dogs are daily users of multiple locations in the GGNRC. We have found the off-lease areas to be a key to our quality of life in the City and an essential component of the excellent socialization of our dogs. This socialization is a benefit to all of the community as our pets are well-behaved, non-agressive and welcome in all areas due to this extensive socialization with other dogs in a off-lease environment. There are significant limits already to the availability of such areas and we would find the proposed restrictions to be a huge mistake.

Correspondence ID: 1317 **Project:** 11759 **Document:** 38106

Received: Mar,19,2011 20:35:05

Correspondence Type: Web Form

Correspondence: I am a dog trainer in the Bay Area and believe that off leash dog play and exercise is a huge part of a behaviorally well dog. Without off leash areas to roam and interact with other dogs and people, dogs will most likely develop many behavior concerns due to lack of contact, frustration from leash restraint and this may escalate to aggression. As a dog owner and someone that interacts with hundreds of dog owners every week, we need off leash areas in order to live harmoniously in this city.

Correspondence ID: 1318 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 09:59:23

Correspondence Type: Web Form

Correspondence: I would prefer to not encounter dogs anywhere, any time. Like bicycle riders, they are squawking quite loudly at your proposed changes. While I can generally avoid them in my normal life, I think dogs are far overrated.

On the other hand, Cats are underrated but we dn't take them to parks!

L

Correspondence ID: 1319 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 12:21:45

Correspondence Type: Web Form

Correspondence: I attended the meeting at SF State University and would like to say thank you for your efforts to educate the public and inspire people to get involved in the process.

I am a dog owner and my dog used to go to Fort Funston with his dog walker 5 days a week. I am at Fort Funston or Crissy Field with my dog on average of once a week or more, I have a friend that hang glides at the fort and have friends with kids who want to go to the beach without dogs there off leash so I feel I have a full grip on the situation in these area.

The plan for Crissy Field makes good sense and although it diminishes the area I can take my dog, it is a fair plan for all. In regards to the Fort Funston Preferred plan I see the following problems and would like to make the following suggestions:

The problems are that the plan forces a greater number of dogs into a smaller area where they are burning off energy. The volume of dogs is much greater than at Crissy Field and I would guess at other parks in general. I believe the reason there have been such few problems at the Fort, taking into account the volume of dog, is that there is enough land for dogs to not just interact, but to choose not to interact and just enjoy the territory. By putting all these dogs together on a smaller stretch of beach makes that difficult to spread out and I suspect would creat more problems.

Another problem is that there are many times the tide is too high to be on the beach in the zone proposed for the off lease zone and therefore is not usable. Keep the areas right of the parking lot and parking lot off leash.

For the hang gliding area (left of the parking lot) should be on leash until 1/3 way down the stairs when a glider is in the area. Have signs posted. This protects the hang gliders and makes it still creates an open area for the dogs.

It should be required that if a dog owner see a horse that they must leash their dog, period. I'm not sure what my dog would do, but I'm not willing to find out and it is common sense. Just because ones dog is off leash does not relinquish an owners responsibility for that dog. The beach area where the

horses are should still be open to off leash dogs especially since that when the tide is high that section of the beach is the only usable beach!

The other option is to make no changes to off leash rules, but put a time limit on it. For example, only off leash from 6am-1pm. In fact, a horn could be placed to signal the time for on leash at 1 or 2 pm. An extreme measure would be to require off leash dogs to be muzzled after that time.

Thank you for your consideration!

Correspondence ID: 1320 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 12:50:03
Correspondence Type: Web Form
Correspondence: My comments are with regard to Muir and Stinson beaches as these are the locations my family visits and tries to enjoy. I would like to go on record stating that I would like to see unleashed dogs banned from the beaches. My grandchildren love to walk on the beach with me but when a dog comes bounding along they become frightened and panicky. They tend to want to run away and this just makes the situation worse. Add to this that one of them has autism and she can easily have the whole experience of a day at the beach turn into a horror.

I realize that dog owners have rights but some of them feel they own all public lands with no regard to others. These beaches are a natural resource for all to enjoy and with these dogs running loose the beauty and pleasure the beaches afford is eradicated for many of us.

PLEASE.....BAN UNLEASHED DOGS FROM THE BEACH!!

Correspondence ID: 1321 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 12:56:47
Correspondence Type: Web Form
Correspondence: I am writing to advocate for the preservation of off-leash dogwalking areas in the GGNRA. I am most concerned about the property in Montara that is about to be acquired. I have lived in Montara since 1978 and have walked a series of dogs there for more than three decades. Most of the people I encounter on the trails have canine companions, and most of the canines are unleashed. In all those years, there have been only a couple of instances when I might have preferred the other dog to have been leashed. The walks with a happy dog able to explore and follow his nose boost the morale of the walker and add to one's well-being.

I would like to add that the proposal to build a parking lot adjacent to Farallone View Elementary School is unwise. It seems to me the parking lot could become a magnet for pedophiles.

Americans are dog lovers. We consider our dogs members of the family. We spend time with them and want and need areas close to home where we can exercise with them. Please provide for this significant number of your tax-paying population by preserving and even carving out new territory for off-leash dogs.

Thank you, Diane Miles

Correspondence ID: 1322 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 13:30:24

Correspondence Type: Web Form

Correspondence: As a long-time dog owner and dog walker I am very disappointed in the proposed leash restrictions for Oakwood Valley and the Alta Trail/Orchard Fire Road/Pacheco Fire Road. Please continue to allow dog voice control in these two areas. I can better understand the proposed leash restrictions for Muir Beach, where there are lots of picnickers, small children, and numerous encounters.

I have hiked with my dog under voice control extensively in the Oakwood Valley and Alta Trail/Orchard Fire Road/Pacheco Fire Road areas. I have not observed dogs under voice control causing issues for people without dogs, nor causing resource impacts. Almost all dog owners in these areas are considerate of others, and most everyone that I have seen who are regular hikers, with and without dogs, always get along fine. I think it's a really small minority of people who don't own dogs who complain, and it's probably people who rarely hike Oakwood/Alta/Orchard too. This is at the expense of the vast majority of us who actually hike there often with our dogs.

Correspondence ID: 1323 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 13:43:40

Correspondence Type: Web Form

Correspondence: I go to places and parks now in Marin that leash laws are required in some parts of the area and in my experience those dogs off leash are under voice control, some more responsive than others. I believe that the dog owners in Marin are educated, savvy and considerate enough that the overwhelming majority are responsible, sensitive and considerate of others.

We can't make the rules/laws just for those few as the lowest common denominator.

If those considering these policies have or have had a dog then they know how important and gratifying from both the owners and the dogs perspective to be allow to run and enjoy themselves. Seeing a dog running, chasing a ball or another dog is truly uplifting.

I have looked at the alternatives and of course prefer those. If we are all involved in self policing and informing owners whose dogs aren't complying then we can all win.

Ron Davidian

Correspondence ID: 1324 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 14:44:10

Correspondence Type: Web Form

Type:

Correspondence: I would like to support the current policy of allowing dogs to run on certain beaches without a leash. I feel strongly that people as well as dogs need to get exercise. There are very few places where a dog can actually run. Walking on a leash is not enough exercise for all dogs. Most neighborhood streets have too much traffic to allow a dog to run up and down. Most pet owners are responsible owners and keep their dogs under control. Unfortunately there are always a few irresponsible people who ruin things for everyone. It is not fair to take away a fun activity for so many people and dogs because a few cannot be considerate of others.

If the rules and expectations are clearly posted and enforced, I do not think there will be any big problems. As a suggestion, the Park Service may want to consider having trash cans and plastic doggie mitts available for pet owners to use to pick up after their dogs. San Rafael provides this service and I never see any dog "droppings" on the streets or in the grass at the parks where these mitts are available.

The Golden Gate National Recreation Area is a wonderful area that is used and enjoyed by many people. Dog owners and their pets should not be denied access to this area. There is more than enough space to meet the needs of everyone.

Thank you for your consideration in the matter.

Kathy Flynn

Correspondence ID: 1325 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 14:44:16

Correspondence Type: Web Form

Correspondence: I attended the 03/09/2011 Public Open-House Meeting at the Cabrillo School in Pacifica and was extremely disappointed in the information I learned there. I am retired and enjoy walking my one dog in many of the local parks run by the Golden Gate National Recreation Area. It is great exercise for me and my dog and is important to to both our mental and physical health. I had understood that we would see the new plans proposed and be able to express our opinions to the GGNRA staff who would be attending the meeting.

The meeting turned out to be a complete farce because all of the plans presented were incredibly more restrictive than what we enjoy now, and the staff would only talk to us about their different plans as though there were giving us a real choice. As I tried to discuss the plans for each of the parks I go to, it became obvious the staff had no intention of trying to understand how much was to be taken away from people by their so called competing plans, but only to make it seem that this was our chance to have some input. No one I talked to wanted to listen to my concerns only to spout each other's rhetoric as as though they had all memorized the same lines.

I heard over and over again the California State Parks are more restrictive than the National Parks. This is simply not true. Dogs on leash are allowed on fire roads in every State Park I have visited. In fact at the Redwood National and State Park a National Park Ranger told I could not take my dog on any fire road but two State Rangers said he was wrong and that I could. I noticed in several plans where roads that motor vehicles are sometimes driven, dogs on leash would be forbidden. For example the Mori Point Road and the Baquiano Trail where I saw a USGS vehicle in March 2011. Wouldn't a reasonable compromise be to allow dogs on leash on most roads where motor vehicles are allowed to drive?

Are there no dog lovers in the National Park Service? Is there no one there that understands the joy of enjoying the outdoors with your pet? It would not be such a hardship if there were a number other places in this area to go to but there are not. Can't your mission include finding a reasonable way to serve the needs of such a large portion of the people who live and visit this area.

It would seem to be a much more reasonable strategy to work with dog people, who I know could be an important resource for contributions and volunteers to help maintain the parks. Instead of alienating a large portion of the population why not work with them. Instead of having meetings where

there is no real discussion why not have meetings where all points of view are listened to. Making so many people so angry does no one any good.

Isn't it possible to have some of the plans discussed be at least remotely acceptable to dog lovers? The way it is now the Park Service is pretending to listen and to have public comment but you must know you are not fooling anyone. The way you are acting just doesn't seem like what I have always thought the Park Service to be. Are Park Rangers no longer the friendly and helpful people I have always known? How will I be able to be able to enjoy getting my national park passport stamped in parks across the country after being treated like this?

Please reconsider what you are doing and the way you are going about it. There has to be a better way.

Correspondence ID: 1326 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 15:47:55
Correspondence Type: Web Form
Correspondence: The Compliance-Based Management Strategy must not be allowed! This poison pill that will allow the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions will not work. It allows a relatively few bad players to undermine and destroy a traditional recreational use of the area. No number of responsible dog owners will stop what will become the inexorable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. Tens or hundreds of thousands of hours of incident-free dog walking will not matter. There should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status can be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made.

Correspondence ID: 1327 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 15:49:23
Correspondence Type: Web Form
Correspondence: The Preferred Alternative is not acceptable! It is overly restrictive, and its restrictions are not justified by the totality of available data. It is based on separation and exclusion, a management philosophy that goes against the values of the Bay Area in which it is fully immersed. It violates the mandate

for the " maintenance of needed recreational open space" contained in the legislation that created the GGNRA. The DEIS is full of negative things that "might" or "could" happen if dogs are allowed off-leash at various sites. But there is very little evidence presented that these hypothetical impacts actually happen. Given the intense scrutiny of dogs by the GGNRA over the past decade and more, the fact that there is not more persuasive real data about significant impacts of off-leash dogs means that there is no real justification for the proposed restrictions contained in the Preferred Alternative. The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with dogs, and could lead to an increase in conflict as more and more people are forced into smaller and smaller areas. The impacts of people moving from the GGNRA into city parks is not adequately addressed in the DEIS. Any alternative must address these impacts on city parks and ways to mitigate them.

Correspondence ID: 1328 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 15:50:19

Correspondence Type: Web Form

Correspondence: The GGNRA should develop a new alternative, the A+ Alternative, that will better balance the recreational needs of the Bay Area with protection of natural resources. The DEIS calls the "No Change" Alternative "A". This is the 1979 Pet Policy with some restrictions, particularly restrictions on off-leash at Ocean Beach, Fort Funston, and Crissy Field because of the snowy plover and native plant restorations. More than one-third of Bay Area residents have dogs and we now know the importance of off-leash recreation for dog's physical and mental health, as well as the importance of the significant social communities that develop where people recreate with their dogs off-leash. This large segment of Bay Area residents should not be restricted to significantly less than 1% of GGNRA land (that is how much GGNRA land is available for off-leash recreation in Alternative A) to have a satisfactory park experience, especially since there is little scientific evidence supporting restrictions on off-leash. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the Bay Area. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and education where problems arise. Enforcement of already existing regulations should target irresponsible dog owners who create the few problems

documented by the GGNRA, while allowing responsible dog owners to continue their traditional off-leash recreation without harassment.

Correspondence ID: 1329 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 15:52:10
Correspondence Type: Web Form
Correspondence: There are not enough trails available for off-leash recreation in the Preferred Alternative. We need more. Not everyone who goes to the GGNRA plays fetch with his or her dog. Many people enjoy hiking on trails with their dogs as their companions. There are not enough trails with off-leash access in the Preferred Alternative.

Correspondence ID: 1330 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 15:53:20
Correspondence Type: Web Form
Correspondence: There are not enough trails available for off-leash recreation in the Preferred Alternative. We need more. Not everyone who goes to the GGNRA plays fetch with his or her dog. Many people enjoy hiking on trails with their dogs as their companions. There are not enough trails with off-leash access in the Preferred Alternative.

Correspondence ID: 1331 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 15:55:12
Correspondence Type: Web Form
Correspondence: Severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. Target enforcement on the small number of people whose dogs misbehave, not on excluding the entire class of people with dogs from most of the GGNRA. Jean Donaldson, nationally recognized expert on dog behavior testified before the SF Animal Control and Welfare Commission on 2/8/07: "[S]elf-selection operates strongly, i.e., people who take the time to get into their car or walk to a designated off-leash area to exercise their dogs tend not to be the type who are derelict in other areas of dog guardianship, such as training, socialization, or appropriate containment."

Correspondence ID: 1332 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,20,2011 15:55:53

Correspondence Type: Web Form

Type:

Correspondence: The DEIS does not adequately address dispersion issues. The DEIS does not adequately address the environmental and social impact of forcing large numbers of people and dogs into much smaller areas. Reducing the amount of area available for off-leash will significantly degrade the park experience for people with dogs. It will increase conflicts. Even more importantly, the DEIS does not address the environmental and social impact on small, neighborhood parks in cities like San Francisco next to the GGNRA. Because the GGNRA is located immediately adjacent to one of the most densely populated areas in the United States (San Francisco), it provides much needed recreational open space for Bay Area residents. If that open space is lost to recreational access, people and their dogs will move to the much smaller city parks and they will not be able to absorb the hundreds or thousands of people with dogs each day that will be kicked out of the GGNRA. As further proof that the GGNRA did not consider impacts on city parks in San Francisco, the Preferred Alternative suggests the nearest legal off-leash area in San Francisco to Fort Funston is Lake Merced. That off-leash area has been closed to off-leash for years and has been turned into a native plant restoration area and habitat for the endangered red-legged frog among other animals. Yet this is where the DEIS suggests people with dogs go.

Correspondence ID: 1333 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,20,2011 15:56:47

Correspondence Type: Web Form

Type:

Correspondence: The DEIS continues a trend of GGNRA claims about impacts by dogs on birds that are not supported by the data. It is based on bad science. There is no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife. Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impacts. This indicates that assumptions about impacts from off-leash dogs must be tested and proven to be true before they can be used to justify restrictions. Unfortunately, most of the assumptions cited by the GGNRA have not been adequately tested or proven. In addition, the GGNRA has repeatedly cited research that they claim shows major impacts from off-leash dogs. However, when the raw data from these studies is analyzed, it is clear the claimed conclusions are not supported by the data. This is highly reminiscent of the problems

documented at the Point Reyes National Seashore, where claims by staff biologists about negative impacts from an oyster farm located within the park were proven to be baseless when the raw data was independently analyzed.

Correspondence ID: 1334 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 15:58:56

Correspondence Type: Web Form

Correspondence: The claim in the DEIS that they have to manage the GGNRA in a manner similar to the way they manage parks like Glacier National Park or Yellowstone National Park is misleading and cannot be used to justify the restrictions called for in the Preferred Alternative. a) The GGNRA is a National Recreation Area, not a National Park. The mandate for the GGNRA's creation was, according to the legislation that established the GGNRA in 1972, for the "maintenance of needed recreational open space". Off-leash dog walking was acknowledged at the time as one of the traditional recreational uses taking place in the GGNRA when it was created. In 1979, the US Congress passed a law that all national park units, including national recreation areas, national seashores, and national monuments have to be managed uniformly. But, concerned that the unique purposes for each park would be overlooked in this change, they added the following language to the law: "The authorization of activities shall be construed and the protection, management, and administration of these areas ? shall not be exercised in derogation of the values and purposes for which these various areas have been established". So there is no mandate to match the GGNRA's policies with National Park Service requirements that dogs not be allowed off-leash in a national park.

b) In 2002, a panel of senior National Park Service officials concluded, in part, "[T]hat off-leash dog walking in GGNRA may be appropriate in selected locations where resource impacts can be adequately mitigated and public safety incidents, and public use conflicts can be appropriately managed." Adequate mitigations and management already exist ? target people whose dogs bother birds and wildlife or who jump on people, but leave the vast majority of responsible dog owners free to recreate off-leash with their dogs on the less than 1% of GGNRA land on which they've always been allowed off-leash.

c) Dogs are allowed off-leash to hunt in national preserves, and other units administered by the National Park Service. Surely, if it's okay for a dog to be off-leash while it helps chase, corner and kill a wild animal, it should be okay for a dog in the GGNRA to be off-leash to play with people and other dogs.

d) The GGNRA is located in the densely populated San Francisco Bay Area. It is in a major urban area. Much of the land was highly modified by the military when they controlled the land before the GGNRA was created. The GGNRA contains numerous missile silos, artillery batteries, and their assorted support structures. The military planted huge amounts of ice plant to stabilize the sand dunes at Fort Funston and elsewhere. Standards of management that treat much of the GGNRA, especially those parts in San Francisco, like pristine wilderness are misguided.

e) During 2/17/07 Negotiated Rulemaking meeting, Barbara Goodyear, the Field Solicitor for the NPS, made it clear that while all parks are managed to the same level (conservation of resources), there is flexibility in how that is done from park to park. She cited as an example, the fact that you don't manage Yosemite Valley with the expectation that people will have a solitary wilderness experience. You manage it with the knowledge that people will bump into each other in that part of Yosemite. The GGNRA, an urban park located in and immediately adjacent to a large city, does not have to be managed in the same way as Yellowstone or Glacier National Parks.

Correspondence ID: 1335 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 15:59:38
Correspondence Type: Web Form
Correspondence: The level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use of GGNRA resources. The DEIS states that it will cost nearly \$1million to enforce the Preferred Alternative, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs.

Correspondence ID: 1336 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The inclusion of a "poison pill" in the DEIS suggests the GGNRA will use it as an end run to ban off-leash dogs in the near future, bypassing the kind of public process such an action is normally required by law to follow. The DEIS includes a "compliance-based management strategy" that says that, if there is not enough compliance with the restrictions imposed by the

Preferred Alternative, the GGNRA will change the management of the various areas to the next more restrictive level ? an off-leash area will become on-leash only, an on-leash area will become no dogs at all. This change will be permanent, with no chance to go back to less restrictive levels at any time in the future. This section must be removed from any final Dog Management Plan. a) This compliance-based management strategy is decidedly unfair, because it can only be changed in one direction ? toward more restrictive levels of access for people with dogs. b) There is no provision for public comment in the case of a change in status of an off-leash or on-leash area because of the compliance-based management strategy. The GGNRA has already lost two court cases (and one appeal) when it tried to make a significant and controversial policy change without going through a public process. The federal courts have routinely told the GGNRA that they have to hold public meetings and take public comments before making such changes. Clearly, a change in status of an off-leash area to leash-only would be both significant and very controversial, and therefore should require a period of public comment and public hearings before being implemented. The poison pill in the DEIS is an end run designed to allow the GGNRA to make such changes without having to go through a public process (they can claim the public process was the public comment on the DEIS itself, not on the changes it allows at a future time). c) How will compliance be monitored? Who will do the monitoring? The GGNRA has repeatedly relied on poorly trained volunteers with a deep-seated bias against dogs to monitor the interactions between dogs and snowy plovers. Why would we expect these compliance monitors to be any less biased? Will their claims of non-compliance be valid? Will the GGNRA resort to the use of surveillance cameras to monitor compliance? While noting that there is no mention of surveillance cameras in the DEIS, GGNRA staff have refused to say they would never be used. d) This allows a few bad actors to result in the removal off-leash access everywhere in the GGNRA, even if there are tens of thousands of hours of incident-free dog walking for every single incident. Including a "nuclear option" in a management plan is not good management policy. Regulations already exist to target those who do not control their dogs when they are off-leash. Target enforcement at those bad actors, not at the huge numbers of dog walkers who do not cause problems.

Correspondence ID: 1337 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 16:01:24
Correspondence Type: Web Form
Correspondence: Off-leash play decreases the likelihood of dog aggression in dogs. In comments to the SF Animal Control and Welfare Commission on 2/8/07, Jean Donaldson, then head of the Dog Training Program at the SF/SPCA and a nationally recognized author on dog behavior said: "There is not only

no evidence that allowing dogs off-leash for play opportunities increases the incidence of aggression, to a person, every reputable expert in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access decreases the likelihood of aggression." She also said: "Interestingly, it could very well be that the safest dogs are those that attend off-leash dog parks." And she said: "There is no research demonstrating that dog parks or off-leash play contributes to any kind of aggression, including dog-dog aggression."

A well-exercised dog is a well-behaved dog. Dogs that are not adequately exercised can develop behavior problems such as barking, destroying property in the home, etc. Behavior problems are one of the primary reasons that people surrender dogs at shelters. San Francisco has a "No Kill" goal that no potentially adoptable animal in a city shelter (SF Animal Care and Control, SF/SPCA, Pets Unlimited). Representatives of the SF/SPCA have said that the Preferred Alternative will make it harder for the SF/SPCA to perform their mission to reduce surrenders to city shelters and make San Francisco a truly No Kill city.

Correspondence ID: 1338 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 16:02:55

Correspondence Type: Web Form

Correspondence: 1) The "Poison Pill" of a "Compliance-Based Management Strategy" is unfair since it can only reduce off-leash access and not increase access in the future, and is an attempt to circumvent the legal requirement of a public process when management changes that are significant or highly controversial are made. It will not work and must be removed.

2) The Preferred Alternative severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA. There is no off-leash access in San Mateo County in the Preferred Alternative and that must be changed.

3) The Preferred Alternative is overly restrictive. The science and data do not support the level of restrictions on people with dogs included in the Preferred Alternative. When dogs are walked in a responsible way (as most are), there is no conflict with the environment or with other park users. Target people not walking their dogs responsibly, but leave the vast majority of us alone.

4) The Preferred Alternative unfairly mandates that any new land that comes

into the GGNRA cannot have dogs either on- or off-leash. This restriction is unneeded, and denies the traditional recreational activity of off-leash dog walking that has existed on many of these lands for decades. It goes against the recreational mandate that was the reason the GGNRA was created. If new land is added to the GGNRA, off-leash access must be allowed on it.

5) The Preferred Alternative is not "balanced." The 1979 Pet Policy allowed dogs off-leash on less than 1% of GGNRA land. Given recent additions of large tracts in San Mateo County to the GGNRA, this number is now significantly less than 1%. Off-leash dog walking started from a position of great imbalance. One-third of San Francisco households have dogs, yet they can currently recreate with their dogs on less than 1% of GGNRA land. The Preferred Alternative allows off-leash on even less, including no off-leash anywhere on GGNRA land in San Mateo County. How is that balanced? By denying the possibility of off-leash on any new lands that come into the GGNRA in the future, the Preferred Alternative will ensure there is no balance between recreation and protection of natural resources in the future. We need more off-leash recreational open space, not less.

6) The Preferred Alternative is based on a philosophy of separation and exclusion. It denies that different park users can co-exist. Rather than share space between different park users, the Preferred Alternative carves up park space into separate areas for different park users. This basic philosophy is the exact opposite of the way we approach problems in San Francisco. It flies in the face of the unique social qualities of San Francisco. The GGNRA needs to develop a new Alternative that will better reflect San Francisco values such as co-existence, shared space, collaboration, and education to address problems should they occur.

7) The Preferred Alternative discourages cooperation between different park users and will increase conflict between park users, as more and more people are crammed into smaller and smaller spaces. Park user groups can work together to resolve problems when they come up. For example, Fort Funston Dog Walkers, SFDOG and the hang glider group Feathered Flyers of Fort Funston collaborated on a series of signs to warn dog owners to keep their dogs out of the hang glider take-off area.

8) The Preferred Alternative condemns every dog owner for the actions of a very few irresponsible owners. According to the GGNRA's own statistics, 94% of dogs do not chase birds (and most of those who did chased seagulls). Yet, all people with dogs will be excluded from a majority of Ocean Beach to "protect" birds. Focus enforcement on people who do not keep their dog from chasing birds rather than on excluding all people with dogs.

9) Dog owners are being held to a standard of behavior that is impossibly

high, and significantly higher than any other park users. For example, studies by GGNRA staff routinely show people without dogs "disturb" plovers, but there is no attempt to restrict people without dogs from the beaches where plovers roost (not nest).

Correspondence ID: 1339 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 16:20:43

Correspondence Type: Web Form

Correspondence: I own two dogs and live Mill Valley. We visit the GGNRA at least four times a week. The Draft Dog Management Plan would reduce our enjoyment and use of the park considerably.

In the plan the enabling legislation for the GGNRA is quoted: "In order to preserve for public use and enjoyment certain areas of Marin and San Francisco counties, California, possessing outstanding natural, historic, scenic and recreational values and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area is hereby established". The plan also discusses the long history of off-leash dog access before and after the creation of the park.

Because open space is so limited in Marin County and San Francisco, and because the GGNRA controls the entire coastline I strongly support continued access to provide reasonable exercise and recreation for dogs and their owners.

I'm very concerned about the tone of the plan and some of the specific provisions.

The objectives listed in the executive summary all relate to controlling, reducing and restricting dog access. Given the park's charter to provide 'public use and enjoyment' and 'needed recreation open space' an important objective should be to preserve sufficient space for off-leash dog access.

The plan exhaustively lists real and theoretical issues related to dog access however there is no comparable section discussing issues with prohibiting or restricting dog access. These include wasting limited park resources on restricting responsible dog owners rather than cautioning the irresponsible, forcing dog owners to travel further to take their dogs for a reasonable walk and increasing the likelihood of aggression by concentrating dogs in increasingly small designated areas.

The plan also continually discusses dog access in the context of park-wide regulations preventing any off-leash dog walking. San Francisco donated

properties to the GGNRA on the proviso that traditional recreation would be maintained. The tone suggests that leash-free access was a mistake, and that the park service is begrudgingly fulfilling the park's mission only when forced to do so. I'd have much more confidence in the process if the plan started from the position of accepting a variety of recreational activities, including off-leash dog walking, and then attempted to balance the varied needs of visitors, culture and wildlife from there.

Given this I find the adaptive management provision of the regulated off-leash areas (ROLAs) to be unacceptable. This provides the NPS with a mechanism to further erode dog access to on-leash only and even to prohibit dogs entirely without further consultation. The plan further states that under no circumstances will the reverse be true ? once dogs are banned the park will never consider opening up access again. This is a far greater threat to preserving the park for future generations than any amount of dog access.

Rather than penalizing the vast majority of responsible dog owners the Dog Management Plan should focus on enforcing existing rules and regulations.

Below I discuss the proposed plan for the sites we visit regularly:

Alta Trail, Orchard Fire Road, and Pacheco Fire Road

The preferred alternative is far too restrictive. This has long been an almost daily walk for us. To limit this trail to on-leash or eliminate dogs entirely would eliminate 90% of the current use of this space since there are so few areas to bring dogs to begin with.

Oakwood Valley

The preferred alternative is far too restrictive. This has recently been a daily walk for us. To limit this trail to on-leash or eliminate dogs entirely would eliminate 80% of the current use of this space since there are so few areas to bring dogs to begin with. The least behaved dogs I've seen on this trail are the ones that are on leash. If you require that all dogs are leashed, because the trail is so narrow in some areas, I predict that dog incidents will actually increase.

Marin Headlands / Rodeo Beach The preferred alternative massively reduces the trail available for hikers with a dog. We often complete the loop up the coastal trail to Hill 88 and then down Wolf Ridge / Miwok to return to Rodeo Beach. The trails are rarely crowded and a well behaved dog has no more impact than a person. The Hill 88 loop should be kept open to off-leash dogs. The preferred alternative for Rodeo Beach is acceptable.

Fort Funston The preferred alternative is far too restrictive. When the closed

section of trail to the north of Fort Funston is open again there should be off-leash access for the full length of the beach and alongside trails so that a loop can be made down the sand ladder and then returning via the central or northern access trails. Of all the GGNRA sites Funston would seem to be the best candidate for Alternative A ? maintaining current access ? especially if the preferred alternative is selected for restricting most of Ocean Beach. We visit Fort Funston weekly, rain or shine, and given how heavily the area is used I'm surprised at how rare it is to encounter any problems.

Correspondence ID: 1340 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 16:23:16
Correspondence Type: Web Form
Correspondence: Continue the History Muir Beach was established as a residential community back in the 1920's, well before the stewardship of the Park Service. The locals consider Muir Beach and its surrounding trails to be their backyard and have been enjoying this land for recreation with their families and pets for almost a century. Historically, Muir Beach has always been a dog-friendly beach and a beloved destination for dog lovers throughout the Bay Area. Let's keep it that way.

Keep the "R" (Recreation) in GGNRA The Golden Gate National Recreation Area (GGNRA) was created by Congress in 1972 to: "provide for the maintenance of needed recreational open space necessary for urban environment and planning" and "to assure the preservation of open spaces ... to provide public access along the waterfront and to expand the maximum extent possible the outdoor recreation opportunities available to the region."

Muir Beach and its surrounding trails must remain open for multi-use recreational activities for all residents of Marin and surrounding Bay Area cities, as was mandated in the legislation that created the GGNRA. The proposed dog ban is in direct opposition to that mandate.

Alternative D is Not Viable The preferred plan states that "off-leash dog walking can occur at a small beach area on county property adjacent to the NPS beach". The area they refer to is called "Little Beach" and it is not accessible without crossing the main beach or driving along neighborhood private roads. Most of the time, the rocks are impassible because of surf and tides. The "social trail" from Pacific Way to the north end of Big Beach is a steep, hazardous, rocky pathway, with no handrails. There is no public parking on Sunset Way or Pacific Way. All spaces are on private property. All lanes are fire lanes. Extra and illegally parked cars would create a hazard for the surrounding community in terms of blocking access to emergency vehicles. For those who would arrive on foot via the road, there are no

amenities or services for Little Beach. No trash cans. No toilets. In addition, Little Beach oftentimes has no beach at all during the winter or at high tide. Squeezing people over to that beach for use with their dogs is not a reasonable alternative. Formally stating and implementing such a plan would require appropriate impact studies and input from the surrounding community. Protect Sensitive Habitats We recognize and support the protection of the newly restored Redwood Creek and lagoon areas with its sensitive habitat and wildlife. However, instead of spending 1 million dollars to enforce new dog rules, as is proposed in the NPS plan, we encourage a more cost-effective approach which would include stepping up educational efforts and increasing signage and boundary markings for all visitors.

Currently, there is only 1 large sign posted at the bridge access to the beach and 2 very small signs which indicate the dunes area and lagoon area restoration efforts. There is no "no swimming" sign posted to discourage people from swimming in the lagoon and creek areas. It is important that the NPS more clearly delineate these areas and then properly enforce the existing rules among all visitors so that these sensitive habitats can be protected.

Marin County residents supported the recent Redwood Creek restoration efforts with their volunteer hours and tax dollars. We do not, however, support environmental concerns that exclude the continued recreational use of the area for residents and visitors -- including those with dogs. Additionally, no data has been presented which proves that dogs are any more harmful to these sensitive areas than people, so it is unfair to restrict usage of the beach and its surrounding trails to this one group. Encourage Responsible Dog Ownership Admittedly, a few dog owners behave badly, but the idea of banning a whole group of people based on the sins of a few goes against the sense of fairness and seems like intrusive government. We believe that simple and cost-effective steps can be taken to mitigate these problems.

As is the case in most other dog-friendly parks throughout the Bay Area, a conveniently located dog litter bag dispenser and waste receptacle would be a simple way to encourage dog owners to pick up after their pets.

In addition, signage should be increased to educate people so that all visitors are clear on the existing rules. Just as the actions of a few irresponsible parents should not ban children entirely from the beach, so goes the logic for dog owners.

We can appreciate that some people desire a "dog-free" experience on local beaches and trails. That option is already available at 99% of GGNRA lands, with the larger public beach at Stinson and most of the surrounding

GGNRA trails already dog-free. In contrast, Muir Beach and the Coastal trails adjacent are the only dog-friendly options which remain in Southern Marin. Safe Hiking, Beyond the beach The preferred alternative would eliminate dog access to the Coastal Fire Road and Trail adjacent to Muir Beach. As it stands, these are the only remaining trails from Muir Beach that are open to dogs. For women who hike alone, this new rule presents a serious safety concern.

In addition, we believe that there should be a legal way for a person to walk between Muir Beach and the nearest community, Mill Valley. Currently, there is no continuous trail that allows this access with a dog. Adding a dog-friendly access of the Coyote Ridge Trail to Miwok Fire Road would allow hikers with dogs to cross from Muir Beach into Mill Valley.

Correspondence ID: 1341 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 18:43:47

Correspondence Type: Web Form

Correspondence: Off-leash dog-walking areas are one of the great benefits of living in the Bay Area. Over more than 30 years, we have taken our dogs for exercise and recreation at Fort Funston.

The progressive limitation on areas where dogs can be off-leash is a great hardship to both dog-owners and dogs. Of all areas being addressed in the document, Ft. Funston is the one that has become a special treasure for those of us with dogs. In general, almost anyone who goes there expects to take a dog or to at least mix with dogs. So, while there are some who go there who might prefer not to encounter off-leash dogs, there are many more who enjoy seeing and interacting with the dogs.

Because of climate, most people who go to the beach in San Francisco do not intend to lie around on blankets in the sun. The beaches are mostly just another outdoor space, and an opportunity to be near the ocean. Dogs in no way impede the enjoyment of our beaches by people, with or without their own dogs. So there really is no reason or justification for a no-off-leash beach area, and especially not for a no-dog area. I have never seen a dog actually catch a wading bird by the ocean; the birds are much too fast for the dogs and easily outpace them in the water or fly away. Also, there is virtually no environment on the beaches that dogs can destroy or degrade.

I have much more often seen people without dogs, including large groups of children under the supervision of adults, in areas of dunes that are fenced off, sliding around on the sand and disturbing the environment, than dogs or people with dogs.

A fair compromise between people who have dogs and want to be able to let them run and play off-leash in the national parklands, and people without dogs who want to enjoy the parks without having to contend with off-leash dogs, ought to take into account that the balance at present greatly favors people without dogs. Even if all of Ft. Funston were open for off-leash dog-walking, without restriction, it would still not be fair to place so many restrictions on dogs in the other areas. But at the very least, Ft. Funston should allow the greatest possible off-leash dog use, so that there continues to be one place in the Bay Area where dogs can enjoy their natural way of life. Dogs are part of the environment too and they deserve to be treated equally with other animals.

Finally, dog-ownership is difficult enough in the city, with so many landlords unwilling to allow dogs in their buildings. Many dogs are cooped up in small spaces for most of the day. They need a place to get out and run and stretch their legs. The physical and mental health of hundreds of thousands of our residents are tied in with the time they can spend outside with their dogs. We need these open spaces where dogs can run free.

Thank you for your consideration.

Peter A. Betcher

Correspondence ID: 1342 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 19:55:47
Correspondence Type: Web Form
Correspondence: I would like to formally select Alternative A (no action). I very much enjoy the parks as is. My only form of recreation is to walk my dog off leash and this is one of the major reasons why I moved to San Francisco. I would not use the parks at all if the proposed changes were made.

-Danesha Vasquez

Correspondence ID: 1343 **Project:** 11759 **Document:** 38106
Received: Mar,20,2011 20:11:03
Correspondence Type: Web Form
Correspondence: To Whom it May Concern, As a concerned citizen and resident of the city of San Francisco, I am deeply troubled by the proposed plan to limit off-leash dog areas in the Bay Area. I have had my puppy for 8 months and I take her to Fort Funston every day. One of the most amazing and critical benefits of living in San Francisco is its perfect combination of nature and urban areas that allow us to live our city lives in a thriving metropolis but also maintain

our rural sensibilities. Dogs are a critical part of our link to nature. Taking my dog Cora to Fort Funston lets me connect with both the urban and rural aspects of San Francisco. The gorgeous city views in between the arboreal landscape while hiking with Cora make me appreciate every day I live in this city. If off-leash access to places like Fort Funston were limited, my dog's enrichment as well as my own would be severely curtailed. And the human canine bonding that we get to experience every day wouldn't exist to the extent that we are afforded today. I rescued Cora from a shelter with the intention of giving her a better life. That life needs to be free with exploration of nature and socialization. Keeping Bay Area recreation areas open to off-leash dogs is the most critical aspect of maintaining a healthy dog. I urge you to reconsider this proposal. Allowing this to pass would lower the quality of life for all San Francisco and Bay Area residents. I am proud to live in this area and enjoy the freedoms that come with it. This proposal makes me sad and embarrassed for us all.

Sincerely,

Ami Barzelay

Correspondence ID: 1344 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 20:59:41

Correspondence Type: Web Form

Correspondence: Hello, As someone that enjoys hiking the trail above Marin City I have to say that the dog walkers that use these trails have behavior that is outrageous!! I have seen one dog walker with over 10 dogs all off leash, and never once did she pick up the poop from any dog in her her herd. I have seen other dog owners with several dogs off leash and again never picking up the poop their dogs leave behind for the rest of us. I think Dogs should be required to be on leash at ALL times! And only 2 dogs per person Thank you for the opportunity to voice my concerns Gail

Correspondence ID: 1345 **Project:** 11759 **Document:** 38106

Received: Mar,20,2011 22:09:04

Correspondence Type: Web Form

Correspondence: I'm writing to express my strong view that Fort Funston and other areas of GGNRA should continue to allow for dogs to be off leash under voice control in designated areas. [Alternative A: No Action (36 CFR 2.15, 36 CFR 7.97 (d); 1979 PetPolicy; GGNRA Compendium)]

If the purpose of GGNRA is to serve a large and diverse urban population while preserving natural, historic, scenic, and recreational values, it is

essential to allow for some reasonable areas for dogs to be allowed off leash. Thousands of dog owners in the Bay Area are taxpaying citizens who depend on these areas to provide opportunities for recreation together with their pets. Dog owners understand and respect that there many places which prohibit dogs, or require them to be on leash. Certain areas of GGNRA--and particularly Fort Funston--have long served as havens for dog owners to enjoy the recreational and scenic beauty of the Bay Area with the companionship of their pets. One of the wonderful aspects of living in the Bay Area is that there are so many places to enjoy our scenic beauty. As a dog owners, we just need a few where we can recreate together.

Thank you for your consideration.

Sincerely,

Michael Chertok

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|-----------------------------|---|-----------------|-------|------------------|-------|
| Correspondence ID: | 1346 | Project: | 11759 | Document: | 38106 |
| Received: | Mar,21,2011 03:45:17 | | | | |
| Correspondence Type: | Web Form | | | | |
| Correspondence: | please don't take away our off leash areas. there are so few places that i can take my two young dogs to release their eneregy and clear their minds. they would become completely depressed. please don't punish the majority for a few people who are unable to follow the rules. | | | | |

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| Correspondence ID: | 1347 | Project: | 11759 | Document: | 38106 |
| Received: | Mar,21,2011 09:33:01 | | | | |
| Correspondence Type: | Web Form | | | | |
| Correspondence: | As a San Francisco resident, dog owner, and outdoor enthusiast, I strongly urge you to keep GGNRA open to all in line with its mandate to serve as an urban recreation area with mixed uses. Off-lease exercise is important for dog health and better exercised dogs are better for everyone in the city. Moreover, take dogs on walks - both on leash and off-leash leads human residents to get out to enjoy the wonderful outdoor spaces in the Bay Area and to get beneficial exercise. Please consider the proven history of dogs coexisting with other activities and wildlife in the GGNRA for the past several decades and continue to let our parks be used as intended! | | | | |

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| Correspondence ID: | 1348 | Project: | 11759 | Document: | 38106 |
| Received: | Mar,21,2011 09:58:11 | | | | |
| Correspondence Type: | Web Form | | | | |

Type:

Correspondence: I am writing to plead with the GGNRA to PLEASE keep the parks open to dogs and off-leash walking throughout the parks. This extreme proposal will completely change the way we experience the wonderful parks and beaches that have been such an asset to the people and dogs of San Francisco.

Congress could resolve this conflict by codifying the GGNRA's 1979 Pet Policy as a Section Seven Special Regulation, and mandating that all properties added to the GGNRA after 1979 maintain historical recreational access.

I moved here 8 months ago with my dog, and have been so happy with the parks and beaches because our dogs have the chance to get the proper exercise and socialization. San Francisco is so special because it is not like any other city, and it has always been so pet-friendly. Please do not take away our parks and beaches. The dogs deserve a place to be happy and exercise. People, dogs and the wildlife CAN share these parks, as they have for 25 + years.

THank you for your time and consideration.

Sincerely, Morgan Fauth (and my dog, Bodhi)

Correspondence ID: 1349 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 10:10:07

Correspondence Type: Web Form

Correspondence: I would like to voice my sincere hopes and wishes that Open Space may continued to be enjoyed by people of all ages who enjoy walking, hiking, and running with their dogs. This beautiful area should be a place that all family members may enjoy and our dogs are our family members. If we want groups to use these open spaces, we must allow people to continue to take their dogs and allow them the freedom of a run on a mountain or in the grass. Thank you for your consideration.

Correspondence ID: 1350 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 10:20:35

Correspondence Type: Web Form

Correspondence: San Francisco parks & the GGNRA has a currently wonderful, working off-leash dog walking policy. "If it ain't broke, don't fix it." It would certainly be easier for the GGNRA to have "consistent" policies, but that is not the point. It's about access for thousands of urban dwellers to utilize their parks. When many of these lands were set aside, it was for mixed use, not pristine

wilderness restoration.

Recently returning from San Diego county, I was appalled by the lack of access that dog owners had to beaches there. DON't let that happen here--it would greatly change the quality of life for so many people. As a parent, a dog owner, and an employee of an environmental organization, I feel we have a great balance now for the parties involved. Chrissy Field is a fine example of protecting endangered species, while providing a place where a parent can take their dog & kids to the same park. (This is very hard to find, as most playgrounds do not allow dogs, and the smaller "dog parks" are not really a great place for young children on the ground.)

Please keep status quo, and work to preserve our status quo so we don't have to go through this process every few years when the governing entities want to take away our access. Thanks

Correspondence ID: 1351 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 10:38:25

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I am strongly in favor of keeping the GGNRA open to dogs and off-leash dog walking. I implore the GGNRA to stop pushing its extreme proposal that will negatively impact tens of thousands of tax-paying and voting residents living in San Francisco and Marin. I understand that Congress could resolve this conflict by codifying the GGNRA's 1979 Pet Policy as a Section Seven Special Regulation, and mandating that all properties added to the GGNRA after 1979 maintain historical recreational access. Please do NOT eliminate or restrict dogs or off-leash dog walking in San Francisco or Marin.

I lived on Chestnut Street in the Marina in San Francisco for 9 years and recently moved to Mill Valley in Marin County. I am the owner of two 13-year old, female Vizslas. I walk my dogs three times a day and send them out with a dog walker once a day while I am at work. Every day after work I take my dogs to Chrissy Field or the Oakwood Valley trail for a 30 minute off leash walk. On Saturday and Sunday I walk them at Chrissy Field in the morning and in the Presidio or the Oakwood Valley Trail in Marin in the afternoon.

I am from the East Coast and have lived in the Bay area for over 11 years. I consider myself fortunate to live in such a beautiful and historical city. Three of the areas I treasure are Chrissy Field, the Oakwood Valley Trail and the Presidio. There are few cities anywhere in the world where one can walk with their dog in a National Park or along a beach. Chrissy Field and the Presidio are two special places in that they are bursting with natural,

beauty and yet are also grounded in rich history. The same holds true for the Oakwood Valley trail, Baker Beach and Fort Funston.

Chrissy Field, the Oakwood Valley Trail, Fort Funston and the Presidio are perfect places to walk dogs off leash. At Chrissy Field the dogs can run on the beach and romp in the field. Few other places provide such diverse terrain and excellent play areas. The Oakwood Valley Trail is also an excellent place for dogs to walk off-leash as there are few people, no cars and ample trails. Other excellent off-leash dog walking areas are the Marin Headlands, Fort Funston and Baker Beach.

As I am sure you are aware, it is very important for a dog's mental and physical health that they get plenty of exercise. Some dog breeds require more exercise than others and it would be difficult for those breeds, such as the Vizsla, to get the proper exercise they require if they can not run and play off leash. My dogs are very high energy and need to exercise at least two hours a day. Exercise and socializing is critical to a dog's health and well-being. I make taking my dogs out for exercise my number one priority.

I am strongly in favor of allowing dogs off-leash in as many GGNRA areas as possible. The more places that one can walk their dog(s) off-leash, the better. I hope you will consider the impact on San Francisco if off leash dog walking is restricted or banned in the GGNRA. Banning or further limiting off leash dogs will have a significant negative impact on San Francisco and Marin county parks. At least 10,000 dogs visit the GGNRA every day. San Francisco city parks are much, much smaller than the GGNRA and will be unable to absorb the impact of all those dogs if they are forced out of the GGNRA. The negative impact on city parks far outweighs any potential negative impacts in the GGNRA.

Given that I walk my dogs several times a day, I am able to get out and meet many local friends and neighbors as well as tourists on my daily walks. Given my passion for the city and Marin, one of the things I am able to do is share stories and history with people who are visiting from out of town. One of the things that makes it easy for them to approach me is my dogs as they form a common bond between people. Every day I am out with my dogs I meet and socialize with people young and old; people gay and straight, people from the city and those visiting.

One of the nice things about Chrissy Field, The Oakwood Valley Trail and the Presidio is that they are multi-use areas. So on any given day one is apt to encounter joggers, walkers, cyclists, people flying kites, windsurfers, people picnicking, etc. One of the charms of the area is that they attract and support such as diverse group of people and wide range of activities. The community of people recreating with off leash dogs represents a tremendous cultural resource in San Francisco and the GGNRA. Where else can you see

people from nearly every ethnic background and race, all socio-economic levels, seniors, families with kids, etc. all getting together every day and every week to socialize together while their dogs play off leash. Walking and playing with off leash dogs brings together people who otherwise would rarely see or interact with one another.

Whenever I am out in Marin on the Oakwood Valley Trail or in San Francisco in the Presidio or Chrissy Field, safety is of utmost importance to me. I believe that banning or further limiting off leash dogs will have a negative impact on park safety. A well- used park is a safe park. Seniors and women, in particular, are often reluctant to walk alone in parks because of fears of muggings or rapes. The presence of people with well-behaved dogs off leash discourages rapists, muggers, homeless people and drug dealers from hanging out in parks. Many people, especially women like myself and elder folks, walk in the GGNRA precisely because there are so many people with off leash dogs there. The dogs provide a valuable sense of safety and security.

San Francisco and Marin residents have been walking dogs off leash in the GGNRA for decades and this is yet another valid consideration for maintaining off leash areas. Off leash dog walking is the status quo. Banning or further limiting where off leash dogs are allowed constitutes a change to the current and historical use of the park. Continuing to allow significant off leash recreation opportunities constitutes a "continuity of use" of park land. I implore you to maintain continuity of use. I am strongly in favor of allowing dogs off-leash in as many GGNRA areas as possible. The more places that one can walk their dog(s) off-leash, the better.

Please do NOT eliminate or restrict dogs of off-leash dog walking in San Francisco or Marin.

Thank you for your time. Sincerely,

Emily Church

Correspondence ID: 1352 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 10:39:00
Correspondence Type: Web Form
Correspondence: Companion dogs are, by definition, socailized to interact with people and other animals. It is proven by experience and research that people who keep dogs are well informed about the best possible experience for the animal, the environment and other creatures. People with companion dogs re thoroughly experienced with regulations and manners (we pay license fees, etc). Because we keep dogs we should not be punished by arbitrary rules and

regulations that in the end serve only those loud enough to acheive their own ends, not for justice for all. Most areas of GGNRA, and other parks, open spaces, etc are on-leash only. Let those who object to sharing the earth with animals walk in their protected areas and keep what little slice is left for enjoying the area in our preferred way. Baseball, soccer,basketball players get free fields, horse people free trails, boaters get free waterways, everyone is served but people who only ask to enjoy their walks without the hassle, pressure and unanatural environment of leashed dogs.

Correspondence ID: 1353 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 11:25:03
Correspondence Type: Web Form
Correspondence: the bay area already has so few places that I can exercise with my dogs. This new management plan will cripple our ability to get out and exercise together. Please don't take away the few dog friendly places left!

Correspondence ID: 1354 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 11:39:47
Correspondence Type: Web Form
Correspondence: To Whomsoever This May Concern,

I am writing to request you to reconsider the draft EIS plan on Dog Management that proposes to restrict off leash dog walking abilities in the GGNRA. This plan has not taken into account all of the impact to the parks in San Francisco. It pits one group of residents against another. Finally, it does not take into account the impact to the local economy. This last is especially important given the state of our economy. Please reconsider.

Sincerely,

Dog Owner San Francisco, CA - 94122

Correspondence ID: 1355 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 11:40:36
Correspondence Type: Web Form
Correspondence: Please do not restrict off-leash access at Fort Funston. My dog is small and stays on the paved paths. The proposed off-leash areas would not be suitable for him. The amount of pleasure the park gives dog owners (and their dogs) far outweighs any harm. The cost of rescuing dogs who go over the cliffs should be borne by the people who own those dogs.

Correspondence ID: 1356 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,21,2011 11:41:27

Correspondence Type: Web Form

Type:

Correspondence: To Whom It May Concern;

The proposal to essentially limit ALL areas in the GGNRA to on-leash or no dogs is not in keeping with the purpose of teh GGNRA to offer eperiences to a large and diverse urban population. In fact, it severely limits the experience of the residents who own dogs. Not only is there no evidence of dogs harming the experience of other visitors or significantly impacting wildlife/vegetation, but you would be doing a disservice to the animal shelters in our area. Th San Francisco Animal Control and Welfare Commission opposes your proposal becaeuse impacts to dog behavior (due to lack of exercise and over-crowding in city parks) and increases in animal surrenders and euthanasia at city shelters are not adequately studied.

Residents of the Bay Area choose to live here to experience all of the outdoor activities we are lucky enough to have available to us. It would be a shame to limit that experience for many with little to no evidence as to negative impacts of dog participation in the GGNRA. We should all learn to share our spaces and not restrict them to the few.

Thank you.

Correspondence ID: 1357 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,21,2011 11:48:49

Correspondence Type: Web Form

Type:

Correspondence: I've commented in the past and I have an update.

Yesterday, 3/20, I was at Fort Funston with my dogs. It was raining and 99% of the people there were dog owners. I only recall seeing one person (a bike rider) that was not associated with a dog. At any rate, it struck me that dog owners are really the folks that use Fort Funston the most. On rainy days at Fort Funston you typically don't see people just out walking, or out for a family event. So it seems ironic to me that the people that recreate at Fort Funston the most (rain or shine) are the ones being penalized by the proposed off leash restrictions. To me, it's like penalizing your "best customers".

Also, currently in the proposal, the beach area at Fort Funston is ROLA (as I understand it). Typically I don't take my dogs to the beach when I'm at Fort

Funston (I go to the beach probably 1 out of every 4 times I go to Fort Funston). However if the plan goes through I will start going to the beach more because it will be one of two ROLA areas. So the beach will now become more crowded with off leash dogs since it is only one of two ROLA places proposed at Fort Funston. It would not surprise me if non-dog owners then loudly complain because they cannot enjoy the beach due to more dogs on the beach. At that point, will the GGNRA simply take away that limited ROLA area as well?

As I've said in previous comments, I don't think the plan has taken into account all the social and economic issues associated with restricted off leash areas.

Correspondence ID: 1358 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 11:58:02

Correspondence Type: Web Form

Correspondence: I walk my dog off leash every weekend. During the week she has a dog walker twice during the week but the weekend is her time to run free and kick up her heels. If Fort Funston, where I walk her, becomes closed to off leash that would be a disaster. It is a place where she can socialize, and so can I, with other people and dogs. Please do not limit the areas where we can walk on weekends. There should be postings saying if you do not have voice control of your dog, please keep her/him off leash but I have seldom encountered dogs that are any problem.

Correspondence ID: 1359 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear National Park Service,

I have been a longtime lover of California National Parks and Recreations services but this new GGNRA Dog management program is deeply concerning for me. As a resident of Daly City and San Mateo county, I frequent Fort Funston and surrounding areas. I am a dog owner and consider my dog part of my family. Maxine is a personable, well trained and energetic mix of beagle and pug. And although, as a responsible dog owner, I walk her on-leash in my neighborhood, the HIGHLIGHT of her day is going to Fort Funston and getting to run free off-leash, with the wind flapping her cute floppy ears and her tail crazily wagging. Max and I respect the beautiful terrain, staying on assigned pathways and always picking up waste when necessary. Her most favorite experience is running down the cliff towards the beach, meeting other playful dogs and owners. Most dog

owners become sensitive towards reactions of how their own particular pet is feeling and I can tell every day we go to Fort Funston is the most wonderful day in the world for Max. I can tell by the pure smile on her face, the shake of her rump and the dangling tongue as she runs with a freedom like no other human can ever experience. PLEASE DO NOT TAKE THIS AWAY FROM HER!!!

There should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. The GGNRA should develop a new alternative, the A+ Alternative, that will better balance the recreational needs of the Bay Area with protection of natural resources. The DEIS calls the "No Change" Alternative "A". This is the 1979 Pet Policy with some restrictions, particularly restrictions on off-leash at Ocean Beach, Fort Funston, and Crissy Field because of the snowy plover and native plant restorations. More than one-third of Bay Area residents have dogs and we now know the importance of off-leash recreation for dog's physical and mental health, as well as the importance of the significant social communities that develop where people recreate with their dogs off-leash. This large segment of Bay Area residents should not be restricted to significantly less than 1% of GGNRA land (that is how much GGNRA land is available for off-leash recreation in Alternative A) to have a satisfactory park experience, especially since there is little scientific evidence supporting restrictions on off-leash. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the Bay Area. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and education where problems arise. Enforcement of already existing regulations should target irresponsible dog owners who create the few problems documented by the GGNRA, while allowing responsible dog owners to continue their traditional off-leash recreation without harassment.

Please, please, please do not take our off-leash parks away! Our best friends need them. Thank you for your time and consideration.

Sincerely,

Kimberley A. Humphrey

Correspondence ID: 1360 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 12:02:17

Correspondence Type: Web Form

Correspondence: Please keep tyhe GGNRA open to dogs and off-leash dog walking. As a SF resident and voter, I do not support this extreme proposal that will negatively impact the Bay Area. Please codify the GGNRA 1970 Pet Policy as a Section Seven Special Regulation, and mandate that all properties added to the GGNRA after 1979 maintain historical recreational access.

Correspondence ID: 1361 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 12:05:17

Correspondence Type: Web Form

Correspondence: There is absolutely no reason to change the 1979 rules, which were meant to carry on permanently. It has been long established that these areas of the GGNRA under review have not had any significant detrimental environmental impact from having dogs off leash in the area. I live very close to Fort Funston and use the park twice a week. My dog visits with her walker another 3x a week beyond that. The draft plan will have a very direct and negative impact in my life and countless other just like me and I urge you to reconsider the scope of your proposals.

Thank you, Aaron Feibus

Correspondence ID: 1362 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 12:14:20

Correspondence Type: Web Form

Correspondence: Please allow dogs off leash at montara mountain i have been walking there for years and have never seen any problems with dogs off leash there. Also, I am opposed to the "portals" that are proposed-they will negatively impact local traffic and local quality of life

Correspondence ID: 1363 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 12:19:30

Correspondence Type: Web Form

Correspondence: Please do not deprive us of the off-leash dog walking areas.

Since getting a dog, I am more fit and active than ever before. It is not just the dogs that will suffer but people living in urban areas in the Bay Area

who enjoy these outdoor spaces and frequent them regularly.

Keeping a dog cooped up in a city apartment amounts to cruelty and leads to unwanted aggressive and territorial behavior. City dogs should be socialized and these off-leash areas offer such an environment.

Please, please do not deprive us of these areas that provide so much healthy enjoyment for both people and their best canine friends.

Thank you for considering this request. Gina

Correspondence ID: 1364 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 12:40:26
Correspondence Type: Web Form
Correspondence: The reason I rescued a dog was because of Crissy Field. I am in the neighborhood OF Crissy Field. We do not have large yards in SF.I would go Crissy, on a regular basis to dream about having a dog, and see how happy everyone is there, walking and wading with their companions. Having an off leash dog area helped me be able to keep a dog I took from an abuser. He is a large dog. There is no way I could run WITH him to get exercise. He and his buddies do that together at Crissy. They have never gone after birds. They are not bird dogs. They do not jump the small fences there. Periodically they enjoy a swim in the pretty calm waves there. We utilize the park space, and leave it better than we found it. I continue to pay the HUGE rent here in SF to be by Crissy Field. I have expanded my dog walking to Ft. Funston as well, and met wonderful people there, all dog people loving and caring for that piece of land. A SMALL piece of GGNRA. The park was deeded for the use of all, and I do not understand why we can not keep it as is. There has been no issues with dog vs human there to speak of. I go 2 X a day to Crissy, and week ends at Ft. Funston. PLEASE I urge you to leave it alone. Where would we all go? San Francisco is a special place, full of special circumstances which we all love it for. This is one. Come by! Come to one of the areas in jeopardy! SEE how wonderful it is. Thank you, Sandy Joachim

Correspondence ID: 1365 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 12:45:47
Correspondence Type: Web Form
Correspondence: Please keep GGNRA open to dogs and off-leash dog walking.

There are so many dogs and their owners that use this area for their dogs

well being.

There are so few places to walk the dogs in an off-leash environment, which keep dogs healthy and fit and mentally stable.

As a dog owner I find this area so vital to myself and my dogs. Not allowing off-leash dog walking in the GGNRA would have such a negative impact on my life.

Please send the word to Congress to resolve this conflict by codifying the GGNRA's 1979 pet policy as a section Seven Special Regulations mandating all properties added to the GGNRA after 1979 maintain historical recreational access.

Thanks, Elissa Schwartz and Rene Terrazas

Correspondence ID: 1366 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 12:55:50
Correspondence Type: Web Form
Correspondence: Please reject this plan and do not change existing allowance for off leash dogs.

Congress originally designated these GGNRA (Golden Gate National Recreational Area) for recreational use. These "recreational areas" were originally so designated by congress for urban areas; we are in an urban area.

There is far more destruction and waste left in these areas by people and children than dogs/dog owners.

Available off-leash areas are already very scarce. Dog owners are tax payers too and deserve equal use of these areas as do footballers, frisbee throwers, kite flyers, picnicians, etc.

Correspondence ID: 1367 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 13:06:42
Correspondence Type: Web Form
Correspondence: I have reviewed the plan, listened to the various debates and, after a lot of discussion with other members of the community cannot see a valid reason for changing the current arrangement. We own a dog and live in Marin County. While I cannot comment on the impacts of the plan on many of the areas listed, we do use Muir Beach and Oakwood Valley extensively and

have enjoyed those areas with our dog (and our two children) often.

We have not had a single negative incident in either of those places as a result of having our dog off leash. Here are my thoughts on the benefits of allowing dogs off leash:

1. It encourages exercise by the families that own the dogs since it gets them out to walk, hike, run etc. in ways that is simply not possible with a dog on a leash.
2. The dog gets much better exercise as it can run at its own speed, explore and generally be a dog, rather than being tied to someone. A happy dog reduces the chances of problems.
3. Dogs are usually more easy going with both other dogs and people when they are off leash than when they are on leash since they have more freedom and feel less threatened.
4. All of our negative dog interactions have come from using "dog parks" where a lot of dogs are confined in a small space.
5. By far the majority of dog owners are responsible owners, pick up after their pets, and minimize any disruption.
6. There is already a huge portion of the GGNRA that is either entirely off limits to dogs or requires dogs to be on leash. Shrinking the areas where dogs can be off leash increases the chances that you will have more problems in the other areas since you will end up with a concentration of dogs in a smaller area. Plus, the people who dislike being where dogs are off leash already have a huge area in which they can go to enjoy the GGNRA.
7. The Oakwood valley is a much easier place to access then the proposed ridge area, especially with children.

Thank you.

Brandon Smith

| | | | |
|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 1368 | Project: 11759 | Document: 38106 |
| Received: | Mar,21,2011 13:06:57 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am a dog owner and truly appreciate the ability to share these spaces with dogs. I hope that the Dog Management Plan maintains, or even expands, the spaces available to take dogs, and that there are enough locations to allow | | |

dogs off leash.

Thank you.

Correspondence ID: 1369 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 13:11:54
Correspondence Type: Web Form
Correspondence: Right now only one percent of the GGNRA is open to off-leash dog walking, and the plan will eliminate 90 percent of this area that has been legally used for decades in places like Ft. Funston, Ocean Beach and Crissy Field. There will be no off-leash access anywhere in San Mateo County and dogs will be outright banned from many parks in Marin. There is no justification for these extreme restrictions. I have been a responsible dog owner visiting many of these sites for 10 years and I have never had an issue like this before. We respect walkers, and designated native planting areas, and we co-exist with other recreational users in the areas.

Correspondence ID: 1370 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 13:18:16
Correspondence Type: Web Form
Correspondence: As a responsible dog owner who values the GGNRA for the management of public open space that serves the community I support balanced and thoughtful guidelines to the use of GGNRA areas by persons with dogs. It is important to me that continued access for dogs off leash at certain locations is continued in order to meet the needs of urban dogs to be able to 'run free' under the control of their owners. I am extremely sensitive to the impact dogs may have on endangered species of all kinds and when visiting these areas make sure that my dogs do not adversely impact any posted sensitive areas. Other dog owners must be made aware that this is essential to allowing our pets to share these areas with us and the natural plant and animal wildlife.

Correspondence ID: 1371 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 13:29:39
Correspondence Type: Web Form
Correspondence: I own a dog and live in San Francisco. My dog and I visit the GGNRA at least once a week. I am so thankful to have such wonderful resources for dogs -- the areas of the GGNRA are one of the things that makes the City truly remarkable. Not only does my dog get to enjoy the GGNRA, but I do as well. The Draft Dog Management Plan would reduce our enjoyment and

use of the park considerably. The more restrictive uses would definitely change my activities with my dog as I would imagine it would for other dog owners. There is tremendous value to going to off leash areas, such as Ocean Beach, with my dog. I urge the city not to change the current dog management rules.

Correspondence ID: 1372 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 13:42:38

Correspondence Type: Web Form

Correspondence: As a responsible dog owner for my entire adult life, I write to urgently request that you keep the GGNRA OPEN to dogs and off-leash dog walking where currently available. Please stop pushing this extreme proposal, a plan that will negatively impact me and my dog directly and so many of us who live in the Bay Area. There are so few areas left where we can exercise our dogs to meet their daily needs for running, play and exercise.

I understand that this conflict could be resolved by codifying the GGNRA's 1979 Pet Policy as a Section Seven Special Regulation and mandating that all properties added to the GGNRA after 1079 maintain historical recreational access.

Let us all continue to enjoy the great natural outdoors with our beloved dog companions. Penalize irresponsible dog owners not the majority of us who respect the laws and clean up after our dogs.

Respectfully, Kate Bednarski

Correspondence ID: 1373 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 13:45:38

Correspondence Type: Web Form

Correspondence: Regulate, police and ticket but don't ban this important amenity. Thank you.

Correspondence ID: 1374 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 13:54:43

Correspondence Type: Web Form

Correspondence: I am not going to provide specific comments on specific plans for specific parks, but do want to provide the following perspective. As a woman and an avid runner/hiker who, prior to moving to California, had the constant companionship of my large breed dog while running by myself on isolated trails, the discovery that many of the trails in the Bay Area completely

prohibit dogs, even on leash, was very disturbing. An on leash dog provides little to no more risk to the habitat than the person using the trail but provides a huge measure of security and safety to a woman hiking on such a trail by herself. I am already unable to take advantage of many of the beautiful trails in the Bay Area for this reason and proposing further inhibitions of this type are extremely disappointing. In fact, I would not support any politician who proposed or supported such changes. I would avidly support laws enforcing existing rules such as heavy fines and enforcement of waste pick-up or ensuring dogs are on leash, but consider laws prohibiting leashed dogs on a trail both a safety issue for myself and not justifiable.

With regards to off-leash dogs, many communities find solutions to this issue that do not involve punishing responsible dog owners for the actions of irresponsible dog owners or irresponsible commercial dog walkers. For example, some communities allow dogs to be licensed to be under voice command of the registered owner. This requires a test to be administered on the owner and dog to obtain the license. This would not only reduce incidence but also reward responsible dog owners. Solutions such as these would be beneficial to both dog owners and non-dog owners.

With regards to dedicated off-leash areas, there are many solutions that do not prohibit dog owners from having a place to allow their dogs to run, play fetch, and otherwise enjoy being a dog. This is even more important in a city such as San Francisco where a privately owned yard is a luxury most cannot afford. Closing Golden Gate Park or Crissy Fields or Fort Funston (or other areas, these are just those I use most frequently) to off-leash dogs will place a huge burden on existing dog parks. These are the largest areas for off-leash dog play in the city. Although not conveniently located to where I live, I make it a point to allow my dog this activity at least once a week. Closure of these areas would place enormous stress on the system with a dog owning population the size of the Bay Area; in fact, the off-leash areas are already insufficient and therefore stressed and overused. I cannot recall a time, in 2 years of taking my dog on a weekly basis to these parks, where I have seen wildlife harassed or a person bitten or threatened by a dog. I am sure such incidence occurs, but am equally sure these are isolated and rare incidence as compared to the number of times a dog comes in contact with a person or with wildlife and should be governed as a rare incidence rather than a common problem. I would strongly support measures to enforce existing rules or strengthening of the rules to protect habitats and non-dog owners but strongly oppose measures to limit off-leash areas.

Finally, I must re-emphasize how upsetting I find the "no dogs" (even on leash) rules that are frequent in the State of California. While I do understand and in most cases support leash laws, the rules prohibiting me the companionship of my dog while running and hiking are both a safety

and quality of life issue, and I completely unclear why this would be so limited. If the same resources expended to limit on leash dogs were put towards enforcement and improvement of rules and regulations, the outcome for non-dog owners and the habitat would be the same but there would be enormous benefit for responsible dog owners.

Thank you, Becky

Correspondence ID: 1375 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 14:34:29
Correspondence Type: Web Form
Correspondence: I am very much against this plan. please do not allow this plan to go through.

Correspondence ID: 1376 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 14:35:55
Correspondence Type: Web Form
Correspondence: I strongly disagree with the EIS's call for leash-only dog walking areas and alternatives B through E. Allowing only 3 dogs per dog walker would apply a tourniquet to the income of these valued local, small businesses. If a number -must- be applied to limiting the amount of dogs to ease the burden of their environmental impact, I suggest the limit be increased to at least 6 dogs.

Limiting the amount of dog activity would severely impact the amount of people who can witness California's coastal beauty, therefore drastically decreasing support of the Bay Area's local 'wilderness' areas.

Correspondence ID: 1377 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 14:44:06
Correspondence Type: Web Form
Correspondence: GGNRA should remain open to dogs and off leash dog walking, without any further restrictions. The 1979 Pet Policy should be codified into law, to permanently allow off leash dog walking.

Correspondence ID: 1378 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 14:52:14
Correspondence Type: Web Form
Correspondence: I am writing to say that I oppose the proposed "Dog Management Plan".

There are already so many restrictions to dog owners and dogs in California, we don't need to lose the few places we are actually allowed to go and allow our dogs some space to exercise and run. As a professional dog trainer and behavior consultant I can tell you that this is critical for the health and mental well being of many dogs in our community. How is it that responsible dog owners who train their dogs, take responsibility for their dogs and clean up after their dogs have rights stripped away from them just because we have dogs? It's just not a good plan. There are so many places available for people to go, do we really need to lose the few we have where dogs are still welcome?

Correspondence ID: 1379 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 15:01:34

Correspondence Type: Web Form

Correspondence: My comments are directed at the plan for Ft. Funston, which we visit several times a week with our Labrador Retreiver, where we all get our exercise playing ball and fetch, and our dog socializes and plays with all the other dogs. As far as I know, Ft. Funston is the only legal off leash recreation area this side of Carmel, with the exception of Esplanade Beach in Pacifica, which is below the crumbling cliffs, with 70 steep stairs that wash away often, and a beach that all but disappears at high tide. We're in our 60's, so access is a big deal to us. The proposed off leash area on the beach below the sand ladder will not be of any use to us. Once you reach the bottom of the sand ladder, you have to climb down to the beach or slide down on your butt, and forget about trying to climb back up! The area near the parking lot is WAY too small to accomodate all of the people who use Ft. Funston!

If, as I suspect, the issue is with professional dog walkers with multiple dogs, why not address it without punishing those of us who enjoy off leash activities with our family pets? Everyone I know and see there, professional dog walkers included, pick up any dog doo we see, not just our own (good Karma so you don't step in someone else's mess). We stay out of fenced areas, discourage our dogs from digging, and fill any holes we see. We police ourselves, and I've never encountered an aggressive dog there in 5 years. This is not to say that there aren't people that don't follow the rules, there are ignorant people everywhere you look. But, we all are willing to speak up when we see someone behaving inappropriately; we don't want a few to spoil it for all of us.

The GGNRA is an URBAN RECREATION AREA! It's NOT a pristine wilderness, and the wildlife there are urban wild animals. I was the supervisor of the Peninsula Humane Society's Wildlife Care Center for many years, and I know that very few of the injuries sustained by wild birds

or mammals are caused by dogs, unless the animal is in the dog's yard of house. Many of the injured or oiled seabirds brought into the Wildlife hospital were brought in by people out with their dogs. I have personally picked up sick and injured birds on the beach at Ft. Funston with off leash dogs, including my own, all around. People call off or restrain their dogs. No one wants to see their dog harm anything living (not even the gophers that do more damage to the plant life than the dogs). Besides, much of Ft. Funston is iceplant!

Finally, in this economy and with the challenges the federal government faces, I think this whole "Dog Plan" is a colossal waste of taxpayer dollars. 10 years of staff time to prepare a 2400 page document designed to fix something that isn't broken seems just insane to me! Not to mention the cost of enforcement or restoring the native plants that were there....when??? With the sand that changes the landscape on a daily basis, good luck with that. PLEASE, PLEASE, PLEASE, do not take away the few recreational opportunities that exist for those of us who enjoy off leash activities with our dogs.

Correspondence ID: 1380 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 15:39:39
Correspondence Type: Web Form
Correspondence: We live in an urban area where dogs play a critical role in our health and well being. This has been well documented in many peer-reviewed journals. There are many programs that integrate dogs into the health care system for the chronically ill, elderly, children with disabilities, mental disease and others. Being in nature is also critical to our health and well being and reciprocally is critical to the health and well being of our dogs. Not allowing our dogs to engage in free play is likely to have a very negative impact on their health and well being and again the corollary would be to expect it to severely negatively impact both their and our health and well-being. This is a poorly thought out policy that should be abolished before it is ever considered.

Correspondence ID: 1381 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 00:00:00
Correspondence Type: Web Form
Correspondence: As a responsible dog owner for my entire life, I write to urgently request that you keep the GGNRA OPEN to dogs and off-leash dog walking where currently available. Please stop pushing this extreme proposal, a plan that will significantly negatively impact both me and my dog directly and so many of us who live in the Bay Area. There are so few areas left where we

can exercise our dogs to meet their daily needs for running, play and exercise as well as meet our needs to be in nature for our mutual health and well-being.

I understand that this conflict could be resolved by codifying the GGNRA's 1979 Pet Policy as a Section Seven Special Regulation and mandating that all properties added to the GGNRA after 1079 maintain historical recreational access.

Let us all continue to enjoy the great natural outdoors with our beloved dog companions. Penalize irresponsible dog owners not the majority of us who respect the laws and clean up after our dogs. It is as annoying to us as to Park's department that these irresponsible dog owners' behave the way they do. I for one, pick up after them when I see fecal matter left in our parks.

Respectfully,

Linda Sonntag

Correspondence ID: 1382 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As a responsible dog owner for my entire adult life, I write to urgently request that you keep the GGNRA OPEN to dogs and off-leash dog walking where currently available. Please stop pushing this extreme proposal, a plan that will negatively impact me and my dog directly and so many of us who live in the Bay Area. There are so few areas left where we can exercise our dogs to meet their daily needs for running, play and exercise. I understand that this conflict could be resolved by codifying the GGNRA's 1979 Pet Policy as a Section Seven Special Regulation and mandating that all properties added to the GGNRA after 1079 maintain historical recreational access.

Let us all continue to enjoy the great natural outdoors with our beloved dog companions. Penalize irresponsible dog owners not the majority of us who respect the laws and clean up after our dogs.

Your action appreciated, trace.

Correspondence ID: 1383 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 16:46:42

Correspondence Type: Web Form

Correspondence: I support the GGNRA Dog Management plan. Many dog owners on the beach cannot control their own dogs. I go fishing at Baker beach every weekend and every time I have dogs sifting through my belongings and urinating all over my fishing gear. It is ridiculous. Dogs should be on a leash at all times.

Correspondence ID: 1384 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 17:06:35

Correspondence Type: Web Form

Correspondence: I feel very strongly and support Alternative A. The majority of dog park users respect the land, the people, and the environment. Not only do I not often see problems, but I believe that these parks are better off due to increased usage and greater visibility of all parts of the park. It will be a real shame if we lose one of the few freedoms left - to walk next to your dog, under voice command, in a natural and respectful way. The only thing rules do is make people try to hide what they're doing. It's far better to allow this to happen out in the open and handle disrespectful and dangerous dogs/owners on a case by case basis rather than a blanket shut down of off-leash walking.

Correspondence ID: 1385 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 17:12:49

Correspondence Type: Web Form

Correspondence: The restrictions you are Proposing for dogs and their owners on GGNRA land are inconceivable to me. GGNRA created the very first urban recreational area back in 1972, and now you are proposing to take that area from the residents in is area? An absolutely horrible idea, it is in effect removing some of our freedoms if this does occur.This is America, land of freedom. You are speaking of Northern California, San Francisco which has long been known as the friendliest dog city in America! Do not remove these freedoms from the citizens of this great state. These are our recreational areas and we choose to spend our time there with our dogs. There must be another solution rather than restrict us in is oppressive way. Please do not make these proposals reality.

Thank you,

Correspondence ID: 1386 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 17:16:26

Correspondence Type: Web Form

Type:

Correspondence: I am not sure why you are so closed minded to allowing dogs off leash for any amount of time at Ft. Mason. There can be no more damage done by off leash dogs than those that party every weekend and leave tons of garbage (by the way recycling bins please), folks that feed the feral cats (bird killers) and skunks, homeless (often see them using the bushes instead of the open washrooms) and the drunken folks leaving lower Ft. Mason who like to drop their momento glasses and use the whole place as their personal toilet. I respectfully request you reconsider and allow dogs off leash between the hours of 6am-9am and 4pm-7pm and use the south side of the palm trees as the one boundary (towards the bathroom), the sidewalks/path as the other part of the boundary.

Correspondence ID: 1387 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 18:42:40

Correspondence Type: Web Form

Correspondence: Take away legitimate off-leash dog areas, and people needing to exercise their dogs will have to start "invading" non-legit places. Dogs need exercise along with their people. And you cannot reasonable "walk" a dog on leash on a beach!! There are way more areas available for people than people with dogs anyway. Don't make it more difficult.

Correspondence ID: 1388 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am truly upset over GGNRA's proposal for the allowance of dogs in park areas - specifically Mori Point, where I live.

When GGNRA took over the Mori Point areas, and started fixing the paths and restoring the natural habitat - some of my neighbors were dismayed, they mourned the loss of being "left alone" - they predicted the end of our way of life out here. I trusted GGNRA - their representatives and the idea that they were restoring a park to its natural state - but still preserving a way of life for the residents of Pacifica.

Now I am ashamed, I have to eat my words - GGNRA is proposing exactly the scenario I scoffed at when my neighbors suggested it. To not be able to even take dogs ON LEASH in areas of Mori Point trails - and further - to restrict off-leash areas... it is just too much. I am a fool, I trusted GGNRA - I trusted their plans and their assurance that this was for the better.

It isn't - if it drives the residents away. I use these trails every single day - every single day me and my children and my dogs will use the trails of Mori

Point. I guarantee you that more than half the people we run into are also walking dogs. To restrict these areas, under any guise - is to prohibit more than 50% of the current traffic at Mori Point.

This is an outrageous proposal - and is going a long way to convincing me that my neighbors were right - and we should have fought to keep this land out of GGNRA's hands altogether. That thought simultaneously saddens and sickens me, as I was the biggest cheerleader for their involvement in our back yard.

Correspondence ID: 1389 **Project:** 11759 **Document:** 38106

Received:

Mar,21,2011 20:19:48

Correspondence Type:

Web Form

Correspondence:

As an aging ex-athlete with damaged joints, the only outdoor exercise that I can enjoy is walking my dog and all our favorite locations are in the GGNRC. Anyone who has walked a dog knows that a dog needs to stop, start, sit, turn, spin and sprint. I on the other hand need to stride at a sustained pace in order to get the cardiovascular exercise necessary to maintain good health. Given the differing needs of my dog and me it is amazing that we can enjoy the same outdoor space together ? but we do when we are able to walk untethered, off leash and at our own paces. Our off leash walks are the joy of my week and add greatly to both our quality of lives! Alternative locations in small city parks would not provide the necessary space for me to get the 20 minutes of sustained cardio exercise that is required to maintain heart health; for this we need long stretches of beaches or trails. My dog is the reason that I even bother to go for walks. While long walks are a bit painful for me this pain is completely offset by the enjoyment that I get from being with my dog and watching him revel in the outdoors, indulge in a spontaneous self performed back rub, smell all that the world has to offer and most importantly to run headlong into the ocean and body surf in and out with the waves!

Please do not further restrict my access to locations that allow my dog and I to enjoy the outdoors together!

Correspondence ID: 1390 **Project:** 11759 **Document:** 38106

Received:

Mar,21,2011 20:44:43

Correspondence Type:

Web Form

Correspondence:

I am familiar with six of the locations provided for on/off leash of dogs. I commend the areas that were picked for dog leashed or set loose. As we expect dog owners to respect and take care of the area they walk, I believe the dog when leashed will be able to do as well in critical area they are

sensitive to footsteps, trash, dog poop. For instance Crissey Field as marked for dogs set free is perfect for exercise and "fetch". Care can be taken with unobstructed view not to endanger other people or other animals.

I believe that new restrictions placed on dog owners will not be overwhelmingly obeyed; the present restrictions are either not known or obeyed by many dog owners. And I believe that those who observe dog transgressions will not respond by informing the owners; it just does not seem to be in our genes any more to reprimand another person's actions unless substantial and visible physical harm is noted. In other words, as much as I truly appreciate the time and hard work by those responsible for this document, I do not believe it will be obeyed unless a strong and effective educational program is directed to neighbors and businesses adjoining the leashed areas as well as hikers and other frequent users of the land in question. Vets and the Chamber of Commerce, TV/radio stations, coffee shops of close proximity, etc., should be informed by word and handouts.

Correspondence ID: 1391 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 21:43:19
Correspondence Type: Web Form
Correspondence: In 1979 the GGNRA was given the management of these land areas with the PROMISE that the areas would retain their original uses as urban recreational areas.

The GGNRA is in the wrong for spending tax payers money on plans that CLEARLY victimize dog owners and their dogs. And these plans change the original agreement sealed in place years ago in the reestablishment of land management - these new proposals are in breach of that promise.

Maintaining park resources and values for future generations is what was intended before the land was handed over to the GGNRA. These areas merge with and surround congested urban land, therefore are essential as available contiguous open spaces.

Why is the executive summary suggesting that it wants to maintain park resources and values for future generations when clearly it is devaluing what has been established for the past 20 years? The land is recreational land and this includes people and their dogs.

But for Alternative A or doing nothing, all other plans including the preferred Alternative victimize and discriminate against dog owners and their ability to use these recreation areas. On the contrary, there is only 1%

of existing off leash dog areas currently available.

In Marin county the off leash areas are proportionally less than the 1%, yet the area is open extensively to horses and their people. These lands have become exclusive and in no way provide a variety of visitor experience.

Instead I would suggest increasing off-leash dog areas in the GGNRA to more than 1% not reducing them. Currently the GGNRA's limit deters dog owners and their friends from visiting these lands, which we ALL pay for in taxes, and should have right to access.

Furthermore but for Alternative A or doing nothing, all other plans including the preferred Alternative do not promote a variety of experiences as the executive summary suggests. Instead they promote exclusion to an already exclusive area of recreational land, by reducing the already limited ability for dog owners and friends of dog owners to use these lands.

But for Alternative A or doing nothing, all plans including the preferred Alternative would increase user conflict not reduce it. And do so not only in those GGNRA areas but in Rec and Park areas and through out the entire urban bay areas. This is a very serious consideration that has not been addressed in the executive summary. Furthermore there is no clear evidence given in the report that scientifically supports such extreme diminishment of off leash dog areas.

Correspondence ID: 1392 **Project:** 11759 **Document:** 38106
Received: Mar,21,2011 23:14:29
Correspondence Type: Web Form
Correspondence: Hello,

I'm a native San Franciscan and I don't have a dog. I do take care of my daughter's dog (huskie mix) on occasion and I have family in the City with a dog. I love birds and am an avid bird watcher. I understand that the Audobon Society's interests in protecting local birds. I also understand that in the City and Marin County dogs need space to run off leash. These proposals seem overly stringent -- dogs need to run off leash. Asking people with dogs to make these sacrifices is as good as taking away physical education from their children; strange that people who care about birds don't care about dogs. There are plenty of places for people and birds to go where there are no dogs. I was very dismayed when I first starting walking my daughter's dog at how few places there are for dogs to be off leash. You can't take them hiking anywhere off leash in the hills of Novato (though we do have Indian Valley Road), nor Bear Valley, nor to any beach but Kehoe and then only to the right. Thank god for Rodeo Beach! I do hope that you

re-consider and leave things as they are. People and their dogs need a lot of off-leash areas. These areas are too limited as it is. Dog parks are awful places--dirty and too crowded. My daughter's dog does not run around there, he just stands around sniffing.

Thank you for your consideration of my comments.

Correspondence ID: 1393 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 23:29:09

Correspondence Type: Web Form

Correspondence: Our family lives 1/2 block from Stern Grove. We frequently walk with our 2 small children around Pine Lake and Stern Grove Amphitheater. While many dog owners follow the rules posted around the recreational area, we are often disturbed to notice how many dog owners/walkers do not follow the rules resulting in unruly, unleashed dogs. The dogs run around unleashed in the Amphitheater, the leashed areas, Pine Lake (in the forested hilly area and in the lake itself) disturbing the wildlife and terrain. Dog owners/walkers often have several dogs unleashed and do not sufficiently supervise them resulting in the dogs' unruly behavior. Unleashed dogs have frequently rushed up to our children in the leashed areas of the park scaring them and us since we do not know the temperament of the dog and the owner is nowhere to be found. There is a very large unleashed grass area where dog owners can allow their dogs to run, play catch and roam freely where people without dogs do not even go. While this area is large it is often at capacity. I think reducing the number of unleashed dog areas in recreational areas of SF will pose a potential safety threat to non-dog owners and children and result in further damage to the terrain of our natural spaces which are so precious in an urban environment. An increase in the number of dogs to Stern Grove due to closures in other parks would increase all of the aforementioned concerns. Thank you for your time and consideration in this matter.

Correspondence ID: 1394 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As a San Francisco resident, dog owner, and outdoor enthusiast, I am writing to urge you ask that the Golden Gate National Recreation Area abandon it's extreme proposal and instead to keep the GGNRA open to dogs and off-lease dog walking.

Off-lease exercise is important for dog health and better exercised dogs are better for everyone in the city. Moreover, take dogs on walks - both on leash

and off-leash leads human residents to get out to enjoy the wonderful outdoor spaces in the Bay Area and to get beneficial exercise. Please consider the proven history of dogs coexisting with other activities and wildlife in the GGNRA for the past several decades and continue to let our parks be used as intended!

Specifically, I understand that Congress could resolve this conflict by codifying the GGNRA's 1979 Pet Policy as a Section Seven Special Regulation, and mandating that all properties added to the GGNRA after 1979 maintain historical recreational access.

Thank you.

Correspondence ID: 1395 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 00:00:00

Correspondence Type: Web Form

Correspondence: We NEED off-leash areas! There are more dogs and cats in SF than kids alone. there are plenty of places for kids and people but what about our pet companions? As it is there are too few off leash areas available. Please don't take away our rights to enjoy the off-leash recreational sites.

Correspondence ID: 1396 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 10:36:01

Correspondence Type: Web Form

Correspondence: To whom it may concern:

As a proud dog owner, I am very concerned with further regulations limiting dog use within public parks. I use many of the parks covered within this document on a regular basis to get a little exercise and enjoy the environment with my canine companion. It is already difficult within the state of California to find areas that are dog friendly and many of the most impressive spectacles are already off limits. I believe it is my responsibility as a dog owner to pick up after my pet and ensure others safety relative to my pets behavior. Limiting use for all based on the behavior of a few is not an acceptable approach to any problem. We can never control all of the variables when it comes to the environment. If we are truly worried about the environment within these areas, then we should just completely shut them down to the public and hope that all of our pollution inducing activities do no affect them from afar. I would urge you please consider these comments as you make your decisions and if you are an elected official keep in mind San Francisco is home to 745,000 people and an estimated 110,000 dogs. I can not speak for all, but as a dog owner an

unfavorable result would surly make me reconsider who I elect in the future.

Thank you,

Trent

Correspondence ID: 1397 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 00:00:00

Correspondence Type: Web Form

Correspondence: My husband and I have been walking various pet dogs all over the mountain and coastal trails in Northern San Mateo County for more than a quarter of a century. We have never caused damage to trails or had any of our dogs interact with or harm any wildlife in the process of this exercise. The ability to get out and enjoy our natural surroundings is paramount to our well-being and good health. It is inconceivable to me that any organization that is funded by tax-paying citizens would then proceed to restrict those said citizens from the land for which their taxes are being utilized. I have noticed a lot of "improvements" have been made in some of these park areas. While that could be construed as a positive measure, I am undeniably furious over these "anti dog owner" restrictions. I do not find it an improvement to have vast tracts of my available outdoor living space removed from my use. I have always supported the land trust measures over the years in hopes of preserving these areas of natural beauty and preventing ugly, scarring development. Yet, while the movement of my feet and my dog's paws across the hillside leaves only the narrowest trail, the GGNRA has proceeded to bulldoze and bring in hay and treated wood products, erecting signage and fences all over the hillsides. If I am going to be restricted from using my local trails simply because I have a dog I enjoy walking I am going to forced to start pushing for a different kind of stewardship. The tax money being used for the GGNRA could be better spent on education than on these limitless restrictions on OUR recreation areas. Stop this unnecessary punishment of dog owners and start realizing who the majority of the people are that are using this land- that is OUR LAND!

I have a dog AND I vote! Laura Arnaudo Pacifica, CA

Correspondence ID: 1398 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 12:54:27

Correspondence Type: Web Form

Correspondence: Hello. I moved to the Bay Area about a year ago. I really enjoyed the fact that many parks included off leash areas.

My favorite spot to take my dog is Fort Funston. What an amazing place! It would be tragic to require dogs on leash at Fort Funston.

A dog walker emailed the information for me to comment about this issue. I decided to comment since this would effect many people and would greatly hurt tourism in SF and the Bay Area. Having dogs off leash is part of the culture in SF.

Thank you for your time, Chris wWehling

Correspondence ID: 1399 **Project:** 11759 **Document:** 38106
Received: Mar,22,2011 13:57:52
Correspondence Type: Web Form
Correspondence: No doubt, dog lovers will overwhelm you with passionate pleas against any restrictions for their pets. I'd like to introduce a measure of reason, logic and intelligence.

The simple, basic facts in this situation are obvious - wherever there are dogs, there are filth and destruction.

1- Dogs dig, urinate and defecate, destroying vegetation and landscaping and leaving filth and disease behind.

2- Dogs alarm, terrify and even attack people, as evidenced in a myriad of news stories over the last few years.

3- Dogs bark, yip and howl, destroying the peaceful ambiance sought by the majority of park patrons.

4- Dogs chase and attack indigenous wildlife, including threatened species.

5- As anyone who has visited a park - local, state or national - will attest, there's no such thing as "voice control." I have never, ever seen a dog engaged in reckless or dangerous behavior restrained by a mere call or command from its owner.

6- Despite the widespread enactment of "pooper scooper" laws, compliance is spotty, at best. Although I believe that most dog owners are conscientious, there's a sizable minority who are not, ruining the environment for everyone.

7- An unfortunate percentage of dog owners possess an appalling arrogance and contempt of law and courtesy. For example, they let their dogs off-leash in leash-control areas. They train their dogs to be aggressive and laugh at

victims of aggression. They become obnoxious and combative while being cited for their dogs' vandalism or destruction. As already mentioned, they refuse comply with "pooper scooper" laws.

In short, in order to maintain our parks as treasures enjoyed by all, dogs must be banned completely. The enjoyment for the vast majority cannot be diminished by the actions of a vocal - even hysterical - minority. Parks are created and maintained as oases of peace, health and beauty for humans, NOT as open-air toilets and playgrounds for pets.

Thank you for the opportunity to comment.

Correspondence ID: 1400 **Project:** 11759 **Document:** 38106
Received: Mar,22,2011 14:17:40
Correspondence Type: Web Form
Correspondence: I am a resident of San Francisco, a dog owner, and frequent visitor to the GGNRA with my dogs. We particularly enjoy For Funston for the off-leash beach walking.

We want to keep the GGNRA open to dogs and off-leash dog walking. Presently, only 1% of the GGNRA is open for off-leash dog walking, and this proposal would limit 90% of this already small portion of the area.

The GGNRA should stop pushing its extreme proposal, a plan that will negatively impact so many of us who live in the Bay Area, a unique part of the country that successfully balances park visitors of all kinds with the ecosystem. Please help us maintain what makes the Bay Area such a wonderful place to live. I personally moved here from the East coast in part to enjoy this lovely landscape with my dogs. This proposal will also harm San Francisco's reputation as a dog friendly city, which currently attracts tourists interested in dog-friendly destinations, and people like me, who relocated here for this perk, which is not taken for granted.

Correspondence ID: 1401 **Project:** 11759 **Document:** 38106
Received: Mar,22,2011 15:48:04
Correspondence Type: Web Form
Correspondence: I think it's very impressive that the GGNRA and local communities went through this intense and lengthy process to develop a dog management strategy that would work for everyone. The Bay Area is incredibly lucky to have this beautiful park filled with spectacular habitats and wildlife right outside our doors. A national park must protect natural and cultural resources for generations to come; that's why the NPS system was

created. The GGNRA is very unusual and special in that it is also an urban park and provides recreation for a large population, and also for their dogs. I love seeing dogs in the park. But I also see a lot of dog owners who are disrespectful of other park users and of park resources. Most off-leash dogs are not being controlled by their owners. Sometimes they dig up plants, knock over children, and force runners and bikers onto trail shoulders. I think it is a good idea to have dogs on leash in most locations and to save some areas of beach for wildlife only. I do think that it's important to keep some of the more developed areas available for off-leash dogs, such as the Crissy Field lawn and Fort Mason's great lawn. Why not have these big lawns be available to dogs? I'd rather see dogs running there than through a pristine patch of coastal scrub in the Presidio. Lawns are huge wasters of water and fertilizer; if they can take some of the doggy need off of the beaches they will at least be serving some purpose. Thanks, Caroline

Correspondence ID: 1402 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 15:52:49

Correspondence Type: Web Form

Type:

Correspondence: I am dog owner and park lover. I am glad to see NPS strive to strike a balance between all park visitors. One of the things that has always impressed me is that I could even bring my dogs onto the trails. I used to live in Sonoma county and most of the county and all the state parks did not allow pets. Although I love very much being able to enjoy the great outdoors with my four-legged friends, I understand not all dog owners are respectful of this right. From my brief look over the plan, I think most of the alternatives are reasonable. There are a few items that I am a bit hesitant about. I know you have been working hard to restore the Muir Beach area but I have to say I would greatly miss having this area available for off-leash fun. On top of that, not being able to bring my dogs there at all would be difficult to bear. I know that it is a challenge to keep dogs out of the creek and restoration area, but perhaps there can be some kind of alternative or compromise to no dogs at all? I am also concerned about no longer having the coastal trail to take my pups on a long "back country" hike. As far as I could tell, the only dog approved hikes would be the trail portions close to the roads. I understand the risk of people hiking the more remote areas and ignoring the leash rules by having their dogs off leash in sensitive habitat areas, but it would be a shame for responsible dog owners to suffer on behalf of the rotten ones. I know you all have a rough road ahead, and I hope you get many useful comments and not so many of the useless ones. Good luck!

Correspondence ID: 1403 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 16:13:53

Correspondence Web Form

Type:

Correspondence: I would like to express my extreme disappointment in and disapproval of your proposal to ban dogs or restrict their off-leash access to the GGNRA, an urban park.

I understand that dogs currently have access to less than 1% of the public park land and that only 4% of incidents in the GGNRA involve dogs.

You are doing a disservice to the many city dwellers who already have limited access to areas where they can exercise their dogs. I am fortunate enough to now live in the East Bay where we have many dog parks and off-leash trails on public lands. However, I enjoy bringing my dog to Crissy Field and watching the dogs romp on the beach.

The inclusion in your proposal to arbitrarily take away access if there is any violation of your proposed rules is incredibly harsh.

I strongly urge you to drop this onerous proposal.

Correspondence ID: 1404 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 16:17:00

Correspondence Type: Web Form

Correspondence: Considering the already very limited off-leash space there is in SF, I find it astonishing that this proposal is even being seriously considered. I have a small to medium sized dog who LOVES being outside. With so few rental properties that have yard space, the open space at Ft. Funston is the only place she can really be free to be with other dogs.

When we're in the car and she figured out where we're going, she has the purest expression of joy on her face. That look and the lessons she learns from being around other dogs is valuable beyond measure.

Please don't take that joy from her.

Correspondence ID: 1405 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 16:37:44

Correspondence Type: Web Form

Correspondence: We have been taking our dog to Rodeo Beach since we found out the leash rules were eased up. It is the one place she can run relatively free. She always responds to commands and has never been in any kind of altercation with anyone or any animal. She is kept on leash from the parking area, the

bridge, and to the top of the dune. She has never been off leash within 50 feet of the lagoon area. We always carry at least two bags for pick-up. I appreciate the concern for the wildlife, but how about the concerns of our not-so-wildlife. Just going through the tunnel whets her enthusiasm for her outing. It would be a shame to bar well behaved dogs from such an experience.

Thank You

Correspondence ID: 1406 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 16:58:21

Correspondence Type: Web Form

Correspondence: I am a homeowner and taxpayer in SF, with 2 dogs. I utilize many park areas around the Bay Area, but very few of those trips do I include my dogs, since most have strict leash policies, with which I regularly comply. i am also an animal welfare activist for many years, and have worked with and supported many groups including the Toronto Wildlife Centre, PETA, Defenders and IFAW. Animals are my biggest passion. The GGNRA is meant as recreational spaces, and the few areas in the bay area that still have some off leash capacity, are a small fraction of all the parks, both urban and rural, that allow offleash. In most parks and open spaces there are very strict on leash or no dog rules. This is simply unfair and draconian. the latest proposals from the NPS, specifically for Funston and Crissy, eliminate over 90% of the off leash areas that currently exist, and I truly, have yet to see a valid reason. There are few altercations between man and dog relatvie to the number of people and dogs that use the facilities. (we dont ban cars because some people die in accidents). There are a small number of areas that serve endangered birds for small parts of the year: these can be properly fenced off either year round or for the specific time in question.

For the many years I have been going to the various parks in question, particularly Funston and Crissy, I have yet to see a single medium to major incident, and would posit these are rare given the high usage.

The proposal to eliminate over 90% of off leash space has not been well thought out, would severely impact us and our dogs, and would force hundreds if not thousands of dogs that currently use these spaces, to venture into much smaller city parks, and that will never be a positive outcome.

The GGNRA is meant to be used by both people and their dogs in a responsible manner, and the vast majority do.

If this plan is carried out, it will have a very negative impact on us dog guardians and our animals, and very much on the users of smaller city parks.

There are many intermediate solutions that are more fair, and would have far less impact, such as the couple i suggested above. The dog community must have more of a voice in this evaluation - if we are shut out of the process, there will be mass disobedience, and a much heavier impact, that ultimately will benefit no-one. we are tax payers here, and our voices deserve to be heard!

yours truly

val ornoy

Correspondence ID: 1407 **Project:** 11759 **Document:** 38106

Received: Mar,22,2011 19:16:00

Correspondence Type: Web Form

Correspondence: I am writing this letter to express my concern about the proposed DEIS Dog Plan for the Golden Gate National Recreation Area (GGNRA). As a local resident and weekly user of the GGNRA, I strongly feel that the proposed plan will negatively impact not only dog owners but other San Francisco and Bay Area residents as well. I strongly support keeping the GGNRA open to dogs and off leash walking. The option to not exercise one's animal simply does not exist, so responsible dog owners will be forced to use other options to give their dogs the exercise they need to be healthy and well adjusted members of society. Given that more than 1/3 of Bay Area residents have a dog, if the current proposal were to pass, we will see an extreme increase in the usage of local dog parks. The recent closure of Fort Funston and Ocean Beach due to the recent tsunami warning gave a preview of what would come if the proposal would pass. In Stern Grove alone, the dog and human traffic more than tripled in a single day due the unavailability of the GGNRA lands. Our local parks were not designed to accommodate the quantity of traffic that would result from the closure of the GGNRA to owners and their dogs. The proposal passing will cause overcrowding and tensions due to overuse. It will also degrade our city parks due to sheer numbers or users, further burdening a local Parks and Rec Department already facing budget constraints.

Currently, off-leash access is restricted to less than 1% of the park land and this access has served the park, its users and the environment well for over 30 years. This history demonstrates that it is possible for the park to responsibly serve all constituents, including the animals and vegetation that call the area home. The GGNRA's current proposal is extreme in the limits it seeks to impose, from the lack of trail access to the massive decrease in general dog access and off-leash access. Particularly disturbing is the Compliance Based Management provision that would allow the GGNRA to arbitrarily discontinue any type of on or off-leash access without any

defined metrics or any type of public input on the issue. The absence of a lack of guidelines for closure amounts to an arbitrary decision based on the sole opinion of the GGNRA which has already demonstrated a strong desire to limit dog and human access to the lands of the GGNRA. This 'poison pill' provision will not only decrease the quality of life for Bay Area residents but also deprive them of the right to express their opinions about policies that directly affect them. I understand and support the intentions to maintain a balance between recreational access for park visitors and the conservation of the land, however, the levels of restriction proposed in the GGNRA's proposed alternatives are not supported by scientific evidence. In a direct contradiction to the claims made in the DEIS, recent studies such as Forrest and Cassidy St. Clair (2006) and Warren (2007) show that off-leash dogs have no impact on the diversity, abundance, and feeding behaviors of birds and small mammals in the GGNRA. Far from being unbiased sources, the authors of these studies have admitted that at the inception of the studies, they expected to find that off-leash dogs had a large negative environmental impact and were surprised to find that no such impact existed. I encourage your team to avoid basing planning on hypothetical scenarios with worst case impacts but rather look at the science that shows it is possible for humans and canines to co-exist with environmental goals.

While I appreciate that the GGNRA staff would like to simplify their role by making the dog policy in the GGNRA match the no dog policy of the National Parks, the fact is that the GGNRA is NOT a National Park. It is a National Recreation Area and that designation was created with the intention of providing critically needed recreational open space in an urban environment. This designation and the assurances given to voters that turning the San Francisco properties over to the National Parks Service would not limit or change the recreational opportunities in the parks fundamentally change the issue and requires that the recreation needs and historical use strongly influence decisions about how the land is used.

I would like to provide specific feedback on the following sections of the DEIS and the GGNRA's Proposed Alternatives. First, the proposed alternative is unnecessarily restrictive in several ways. The contraction of off-leash lands will cause overcrowding in city dog parks and will deny a significant portion of the Bay Area residents access to the recreational open space that was defined in the legislation that created the GGNRA. As the area grows more populated and the GGNRA expands, we need more access to off-leash lands, not less. The proposed alternative also lacks any off-leash access in San Mateo County, where there was considerable access prior to the land's annexation to the GGNRA. Across the GGNRA, the proposed alternative does not provide sufficient access to hiking trails and the trails that are included in the proposal are functionally limiting due to the fact that they are not very long and many are not accessible due to connecting to

trails where trails are not canine friendly.

Second, as a taxpayer and contributor to the National Parks Foundation, I feel the funds required to enforce the Preferred Alternative are not a wise use of fiscal resources. In an era of shrinking federal budgets, directing over a million dollars per year to the enforcement of unnecessary restrictions on dog access is an irresponsible use of taxpayer and donor monies.

Finally, the Compliance-Based Management Strategy and the stated intentions to automatically deny canine access to any future lands annexed to the GGNRA are not only bad policy but also deny area residents the opportunity to exercise their right to comment on policies that directly impact them.

I do not find any of the proposed alternatives to be acceptable and as an alternative, I would like to see the GGNRA's 1979 Pet Policy continued to be enforced, with all properties added to the GGNRA after 1979 maintaining historical access. Unlike the overly restrictive proposals currently under consideration, the 1979 policy takes into account the needs of all constituents and balances environmental needs with the needs of humans and their canine companions. I appreciate that there should be access for people who are not fans of dogs and for the wildlife that would prefer not to interact with canines. The status quo provides those options in over 99% of the GGNRA park lands. The existing model has successfully worked for over three decades and attempts to significantly reduce the limited options currently available cause unnecessary conflict and enforcement wastes precious tax dollars that could be positively used elsewhere. I strongly urge the National Parks Service to abandon all proposed alternatives and allow the 1979 Pet Policy to continue. GGNRA holds a unique position as open space in a major urban area and further restrictions on its use will negatively impact the quality of life for all residents across the Bay Area, not just those who own pets. Please allow all Bay Area residents the opportunity to enjoy it equally.

Regards, Kathleen Flores San Francisco Resident

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|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 1408 | Project: 11759 | Document: 38106 |
| Received: | Mar,22,2011 23:00:29 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Please do not close or exclude large portions of the GGNRA to off-leash dog walking, as is now proposed in your 'preferred' scenarios. The ability to have my two dogs off-leash on the beaches of the Pacific Ocean in the Bay Area provides them and I with much-needed exercise, fresh air, and beautiful scenery - which makes us all better citizens in this busy world. | | |

Dogs and their people make up a very large portion of the number of people who go to each and every area targeted on your list for restrictions, and the vast majority of that group take proper care of their dogs, including waste pickup and proper conduct. The Bay Area is a special and unique place, and the ability to get outdoors with our animals is part of that. Please do not take that away from some of your most loyal advocates.

Correspondence ID: 1409 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 08:19:12

Correspondence Type: Web Form

Correspondence: Hello to all at the park service,

Just last week 3-17-11 While coming in to land a free running pit bull leaped and bit on to my harness. Last year while launching another free running dog leaped and bit into my thigh. The dog held on and was lifted into the air. I had bad bruising and 4 punctures. A report was issued to the park. PLEASE IMPLIMENT PLAN C Just yesterday 3-22-11 a dog walker had 10 dogs+- none on leash and he had no control. Thank You Eric Mies Vice President Fellow Feathers Hang Gliding Club

Correspondence ID: 1410 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 10:32:16

Correspondence Type: Web Form

Correspondence: I am writing in response to the proposed changes limiting dogs in park areas. It has been increasingly difficult to find places to take my dog out with the entire family. Parks are an area where families go together and our dog is part of our family.

The more limits that are put on where dogs are allowed the less people take their dogs out to mix with other people. This only leads to dogs remaining locked up at home with no interaction with other people. Leading to dogs with bad social skills and making them more hostile when they do go out.

If dogs are not allowed outdoors in nature where is an appropriate place for them? This is a perfect world with many imperfections. If we continue limit rights little by little because of someone else's intolerance what are we left with.

Correspondence ID: 1411 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 11:13:27

Correspondence Type: Web Form

Type:

Correspondence: Currently the main people that use Ocean Beach and Fort Funston are people with dogs. For the most part the beach is dirty due to human pollution. It would be a lot more helpful to the community to allocate money used for this type of survey to adding services to the beach areas, such as more public washrooms, better garbage management, and showers.

On another note, limiting where dogs can run off-leash will lead to more issues with dogs having pent up energy. Without proper exercise, there will be more dogs that become 'difficult' and end up in shelters. Everyone should have to volunteer in an animal shelter to become aware of what humanity has done to dogs.

This change to the use of public parks policy, is just a step in the wrong direction. Rather than making the parks more available to the people, you are taking away availability to areas that are managed by our tax payer dollars.

Thank you, Joanna Beskal

Correspondence ID: 1412 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 11:24:27

Correspondence Type: Web Form

Correspondence: I really question the bay area when our residents are concerned about dogs getting enough exercise. Let's work on getting humans to get enough exercise first. One way of getting humans to exercise more would be to require leashes everywhere in the GGNRA. This would mean that if the owner wants the dog to get exercise, the owner would most likely have to get exercise. (or get a dog walker). At the moment, I observe dog owners sitting or standing in the park and not getting aerobic exercise while there dogs are wandering all over the park often off of voice control. Furthermore, dogs on leash would also allow people who have avoided the parks due to off leash dogs to get exercise as well. Overall, leash requirements would improve human health by increasing human exercise. Increased exercise leads to less diabetes, hypertension, heart disease and many more health problems. Leashes = one step to a healthier bay area.

Correspondence ID: 1413 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 11:24:37

Correspondence Type: Web Form

Correspondence: Good Morning-

As a SF resident, avid surfer, and responsible dog owner; I anted to provide you my thoughts on any additional proposed dog bans at Ocean Beach.

I fully understand the need to protect the Snowy Plover, and the designated areas and time frames needed in order to do so. However it sickens me to think that a vastly unpopular and underutilized part of the city such as Ocean Beach is considering any further restrictions to pet owners.

I ensure I pick up after my dog and that we are only a value ad to any other potential beach goers.

Let's do the right thing for ALL Ocean Beach visitors, and allow our dogs to have an area where they can roam free.

Thanks

Correspondence ID: 1414 **Project:** 11759 **Document:** 38106
Received: Mar,23,2011 11:42:29
Correspondence Type: Web Form
Correspondence: I spend quite a bit of time at Fort Funston and have seen many instances of problems with the off leash dogs out there. I support Alternative 'C' on map 16 as the best plan for the Fort. The dog owners of the San Fran area , as well as the dogs , need a good place for exercise , and the Fort may provide that, but the other users of the Park should not have to avoid Fort Funston because there are so many dogs in that one place. there are many people who simply don't go to the Fort because they are generally afraid of off leash dogs. My wife is one of these people. If alternative 'C' were implemented , my wife would visit the Fort. She has not been there in 8 years, though I go every week in order to enjoy some flying.

charlie Nelson

Correspondence ID: 1415 **Project:** 11759 **Document:** 38106
Received: Mar,23,2011 11:44:24
Correspondence Type: Web Form
Correspondence: Greetings, I have seen some crazy things that people do with their dogs. I have watched a man throw a ball into the clearly marked restored dunes at Crissy Field, he throws his ball into the gated off dune repeatedly while his large chocolate lab chased it into these dunes several times. I think it is appalling that owners are so irresponsible! Furthermore, one day I was riding my bike at the Great Lawn at Fort Mason heading to the Crissy Field

Center and of course there were several dogs of leash, but one german shepard decided to run right in front of my bike. The owner wasnt even paying attention to their dog! I flew off my bike got many cuts and scrapes and had to seek treatment. This costed the NPS money, as it was classified under workers compensation. Insane! There are clear signs that say keep your dog on a leash! Also, have you ever seen the dog walkers at Alta Ave in marin city>? They listerally bring five plus dogs. These dogs are usually off leash, piss and crap everywhere, and the walkers do not have the dogs under voice control. Alta ave is at the top of mountain. All that piss and crap ends up in the watershed downhill, awful. And of course its a project area (marin city) that has to deal with that wafting smell of doody in the air! Also, alta ave has mission blue butterfly habitat that the park pays lots of money to protect. These dogs off leash come in and tear up the lupine plants. Atrocious.

In other words, there needs to be a strict enforcement of dog rules. Designate a place where dogs can be off leash, but make sure you can enforce the rules! Signs just don't work! There needs to be enforcement!

Correspondence ID: 1416 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 12:34:44

Correspondence Type: Web Form

Correspondence: I support Preferred Alternative "C". I am an 11-year pilot who lives in SF flies at Fort Funston on a regular basis. It's the only place to fly in San Francisco County and the best place within an hour's drive for both pilots and spectators. I enjoy seeing the dogs around, but there have been too many problems with irresponsible owners and unchecked, professional dog-walkers. Nearly every time I visit I have to draw the attention of a dog owner to pick up their dog's droppings. More seriously, I have several friends who have been threatened or attacked by off-leash dogs. When you're coming in for a landing in the only spot available, a dog can mean the difference between a safe landing and a serious injury. The notion of dogs being under voice control is laughable. When there's a huge kite coming down out of the sky, off-leash dogs just aren't going to respond.

Thanks for your consideration,

Daniel

Correspondence ID: 1417 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 12:57:20

Correspondence Type: Web Form

Correspondence: Although I live in the east bay, my dogs and I regularly drive an hour or more to access great beaches like Fort Funston and Stinson, and we can't overstate how important the off-leash areas are for dogs and their people. As a dog owner and as a veterinarian I know the health benefits of regular, off-leash activity and ocean swimming - both for my dogs and for myself. If we lost our access to these beautiful areas, not only would my dogs miss them, but by association I would be banned as well: where I go my dogs go so I know that these restrictions would limit my ability to enjoy and appreciate the gorgeous wilderness around SF - an enjoyment I feel that I'm entitled to just as much as the rest of the citizens and taxpayers here. Again, as a vet I've sutured up my fair share of dog fight wounds, and it's interesting to note that none of my cases have come from off-leash dog parks: they've all happened while on leash and on sidewalks, many times even in yards. Not to say that the risk of dog fights isn't higher in areas with higher dog density, just that the majority of owners who take the time to walk their dog off-leash in the areas in question are responsible and conscientious, and this leads to more happy, healthy, and mentally stable pets. I absolutely agree that dog droppings spoil the area and increase transmission of disease, which in rare cases can pose a zoonotic risk as well. By all means the parks dept should increase fines for irresponsible dog owners: those who don't pick up, those who don't license and provide appropriate health care for their pets, and especially those whose pets have behavioural issues. But please don't use those infrequent cases to take away our right to off-leash exercise and ocean swimming. Please feel free to contact me directly if you have any questions or comments.

Correspondence ID: 1418 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 13:00:40

Correspondence Type: Web Form

Correspondence: Greetings ? Since you have extended the comment period until May 29, 2011, I have decided to continue working on my contribution, which will give me more time to gather material and to sort out my personal thoughts. I'm writing this now in order to recognize the very difficult situation that you, as the ultimate decision makers, are now inescapably saddled with. I have been involved in this controversy for many years now, primarily as a private citizen, but solidly aligned with those that recognize the environmental aspect of this issue as paramount.

Over the years I have talked to Rangers in the field that have confessed that they have gone home with knots in their stomach from all the verbal abuse they receive from irate dog owners and I completely sympathize and understand this aspect of your problem. I am also very much aware of just how well organized and effective the pro dog community has been in presenting their side of this discussion, which has garnered them, much

press and political attention most of which seems sympathetic to their position. I fear that these factors will end up playing a disproportionate role in how this controversy is finally resolved leaving the natural flora and fauna to fend for itself.

On January 24, 2011 the San Francisco Chronicle published this letter of mine that I think accurately expresses my feelings and concerns. They titled my letter:

Protect our precious parks from the dogs

Editor - As soon as I saw the headline suggesting that dogs may be banned from some GGNRA parks ("Federal plan would leash, ban dogs in many parks," Jan. 13), I could hear echoes of past public forum shouting matches, and judging by The Chronicle's unfortunate choice of letters on the subject, we can look forward to even more shouting.

Although I now have a much better understanding of just how impassioned and motivated dog owners really are, I remain bewildered by a Bay Area community that, while cherishing the mantle of enlightened environmentalism, still sees a dog chasing a bird into the sunset as wholesome, harmless recreation and an appropriate national park activity.

I sincerely hope that the National Park Service will demonstrate enough courage to follow its lawful mandate to preserve and protect our precious park resources. Once that happens, park visitors will be amazed at just how many wild and wonderful creatures will again appear as if to illuminate the original intent behind our parks.

M. Bruce Grosjean, San Francisco

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| Correspondence ID: | 1419 | Project: 11759 | Document: 38106 |
| Received: | Mar,23,2011 15:30:20 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am writing concerning the Draft Dog Management Plan / Environmental Impact Statement. Based on my experiences at GGNRA and many other parks, I would like to see the plan improved as follows: | | |
| | 1. Increase the target compliance rate from 75% to at least 95%. Given the large number of dog owners who use the park, a 75% compliance rate will allow significant negative impacts to wildlife and other park users. | | |
| | 2. ROLAs should be fenced. If the boundaries are not clearly defined, there will be too many opportunities for straying outside the boundaries, either | | |

accidentally, intentionally, or through negligence.

3. Commercial dog walking should not be permitted in GGNRA. Business owners have other places they can walk dogs, and since commercial dog walkers generally have more than one dog, it makes it much more likely that they will have difficulty monitoring and controlling their dogs.

Correspondence ID: 1420 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 15:54:22

Correspondence Type: Web Form

Correspondence: hello,

I believe that Preferred Alternative "C" is the best plan for Fort Funston. I fly hang gliders at the fort and have been charged by 3 dogs. It's kind of scary, my main concern is safety. Dog walker and dog owners need to be accountable for these dogs. It's a big park, there is plenty of room for us all, we must enforce some kind of regulation for tourist safety.

Another point is when dogs are on the edge of the cliff not on voice command, the dogs are advancing the erosion, we have place wood chips on the edge which seems to be holding the cliff edge well..

thanks,

Van Pelham

Correspondence ID: 1421 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 16:35:03

Correspondence Type: Web Form

Correspondence: I am writing about the possible closure of unleashed dog walking areas in San Francisco. I am very concerned about this proposal as this is the only form exercise my dog Riley (Lab/Boxer/Rot/Ridgeback mix) has to go. There are literally no areas other than up at Fort Funston or The Grove to walk my dog. Where do these people trying to implement this proposal expect for us to walk/exercise our pets and ourselves for that matter? It's absolutely absurd!!

Pets deserve to have a place where they can go to walk freely (of course supervised), and to interact with other dogs and get their daily exercise just as much, if not more than human beings.

Please do not implement this proposal. Pick on someone else's rights. Leave

the dogs alone!!! My dog Riley can't speak for himself, but I sure as hell will!

Thank You

Karen A. Patt Citizen of Daly City, California 4th Generation San Franciscan

Correspondence ID: 1422 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 17:07:26

Correspondence Type: Web Form

Correspondence: To Whom it May Concern: I have read parts of your EIS and tried to understand the Executive Summary, which baffles me. I live in Muir Beach and this has been a dog-friendly beach for many (40+) years. I have lived here for 16 years and can see the beach from my window. Most of the times I see dogs frolicking at the water's edge and swimming. They are having more fun than the people and they are far less destructive than the people also. If a dog wanders into the "new lands" area, it is the responsibility of their guardian to call them back....if that doesn't happen it is the person who is at fault since dog's can't read signs. On a nice weekend most of the playing in the creek mouth is by children who often build dams (mostly boys) across the endangered salmon habitat. After a big weekend there is also alot of trash that I pick up as do others in my community. I never saw a dog leave trash behind, unless you are talking about their feces and again, a responsible pet owner picks that up. There is definitely far more destructive behavior perpetrated on this area by humans than by dogs.

Muir Beach is a wonderful place to live - surrounded by open space and vast hiking trails....unfortunately we have only one trail (the coastal trail) where we can hike with our dogs and you want to take that away from us too. If I understand your position, the only place dogs would be allowed is on Pacific Way and the beach parking lot. Really, that is absurd. Muir Beach is a small beach that is dog-friendly. People who do not like dogs can go to one of the many beaches in the area that are already dog-free. Why would you want to take away the one beach left for people to recreate with their dogs. I thought Golden Gate Recreation Area was for recreating - and that means playing at the beach with your children and/or your pet. Children are far more noisy and destructive yet you wouldn't think of banning them....so why are you picking on dogs? Especially here in probably the most dog-friendly area of the country. From what I read in your EIS you are suggesting that people and their dogs go to Little Beach! This is ludicrous. The road to and from there (sunset way) is not equipped to handle any more traffic. It is basically a fire road and needs to remain that way. There is no parking and what little there is on the roadside is usually residential parking.

There are no facilities at Little Beach and during the winter months the beach is pretty much unusable as the sand washes out and it becomes just another bit of rocky coastline.

I read that 99% of GGNRA land is already dog-free - that means 1% is available for people and their dogs. If this is in response to people not liking dogs I find it difficult to believe that the NPS could not let us keep the measly 1% that we have to enjoy our pets. I actually feel that this whole issue should be turned around and dogs should have more off-leash areas when there is such a minute portion of federal lands where they are welcome. What's with the bad attitude toward dogs? I hope that the NPS and the GGNRA can see the error of this plan and continue the status quo here at Muir Beach or, better yet, open more of the trails to people and their faithful companions.

Correspondence ID: 1423 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 18:02:56

Correspondence Type: Web Form

Correspondence: Dear GGNRA,

I support Alternative C of the Draft Dog Management Plan. Thank you for your efforts in this area and for considering the safe and clean use of our bay area parks.

Thank you,

Chris Valley San Mateo, CA

Correspondence ID: 1424 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 18:46:17

Correspondence Type: Web Form

Correspondence: If the estimates are correct, there are over 100,000 dogs in San Francisco alone, with perhaps upward of a million in the greater Bay Area. Fortunately, only a very small fraction of them visit your parks, just as only a very small percentage of the general population do. The point is that dog owners constitute a substantial sub-set of the general population and, as such, they have rights to use the park as well. To ban their animals is to discriminate against them, denying them equal access.

Exaggerated complaints of problems will always happen. That is to be expected. The solution is to maintain the status quo. The small portion of the parks and few beaches under your care that allows dogs off-leash represents

a fair proportional distribution of the overall park lands. Between pedestrians, mountain bikers, horseback riders, and pet owners walking their dogs, a good mix prevails. Sure, because you can't please everyone all the time, there will be occasional bickering between horse riders and bikers, pedestrians and dog owners.

One argument that I've heard for banning dogs from Muir Beach, in particular, is that non-dog owners don't visit the park. My experience, to the contrary, is that both dog owners and non-dog owners equally joy the park. The presence of off-leash dogs offers an air of freedom consistent with the wilderness. There's even a section of the beach where clothing is frowned upon but that does not keep others away.

Another argument that has been forwarded is that dogs are bad for the environment. In my experience dog owners are overwhelmingly respectful of the environment. They religiously pick up after their pets. Their dogs are well-mannered and well-controlled. And owners are better than the general population at picking up litter and respecting sensitive areas.

In my experience that it's the people in parks and on beaches that are the problem, not the pets. People have fires, leave litter, go off trail, and impact flora and fauna more than dogs. Sure, a rare, few inconsiderate pet owners might not pick up after their charges but that is the rare exception, not the rule. Other owners often pick up their slack. Dogs exercising off-leash at the shoreline don't cause any problems at all, as far as I can see.

And remember, to their owners dogs are people, too, you know.

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| Correspondence ID: | 1425 | Project: 11759 | Document: 38106 |
| Received: | Mar,23,2011 21:27:31 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | The attempt by the GGNRA to severely limit off-leash access in the San Francisco area is an altogether arbitrary, unwarranted and outrageous intrusion into the legitimate rights of taxpaying individuals, who are merely seeking out what little urban space remains in which to exercise their dogs responsibly. According to the Humane Society of the United States (HSUS), an estimated 39 percent of all American households own at least one dog. How, one may ask, does a government agency that purports to represent all citizens simply decree that canine family members are unwelcome? A recreational area, by definition, is not an exclusive space; rather, it is a managed region in which the inevitable competing interests are accommodated. Limiting dogs is the first step in banning dogs from GGNRA jurisdictions and this is not only reprehensible, but indefensible. I urge those of us who believe in off-leash access to fight the GGNRA | | |

vigorously. There is a dangerous Groupthink. If you love your dog, and your outdoors time together, get busy on the phones, write letters, and show up when the GGNRA toadies schedule a policy meeting. Sadly, it's now or never.

Correspondence ID: 1426 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 22:28:16

Correspondence Type: Web Form

Correspondence: I am writing to ask you to stop the Golden Gate National Recreation Area from implementing its 'dog management' plan, which would severely restrict dogs and off-leash dog walking in places like Fort Funston, Ocean Beach, Crissy Field, Marin Headlands, Muir Beach, and other locations that have welcomed dogs for decades. The GGNRA's proposal will eliminate a main form of recreation that takes place at these recreation areas and negatively impact thousands of us who live in the San Francisco Bay Area. The GGNRA is not the same as Yosemite or Yellowstone, its in the middle of an urban metropolis and needs to meet the needs of urban residents. If anything, limit the number of dogs allowed per person, don't ban dogs all together. The accessibility of the GGNRA to dogs is one of the great things about it, and a part of San Francisco's uniqueness.

Sincerely,

Alison Holzer

Correspondence ID: 1427 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 22:29:54

Correspondence Type: Web Form

Correspondence: I am writing to ask you to stop the Golden Gate National Recreation Area from implementing its 'dog management' plan, which would severely restrict dogs and off-leash dog walking in places like Fort Funston, Ocean Beach, Crissy Field, Marin Headlands, Muir Beach, and other locations that have welcomed dogs for decades. The GGNRA's proposal will eliminate a main form of recreation that takes place at these recreation areas and negatively impact thousands of us who live in the San Francisco Bay Area. The GGNRA is not the same as Yosemite or Yellowstone, its in the middle of an urban metropolis and needs to meet the needs of urban residents. If anything, limit the number of dogs allowed per person, don't ban dogs all together. The accessibility of the GGNRA to dogs is one of the great things about it, and a part of San Francisco's uniqueness.

Sincerely,

Cantrez Triplitt

Correspondence ID: 1428 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 01:06:05
Correspondence Type: Web Form
Correspondence: To Whom it May Concern,

I am writing to oppose any changes that move areas from being off-leash (and under voice control) to leash required.

I feel strongly that there are not enough areas in the SF Bay area for dogs to run freely and it is not natural or healthy for dogs to exercise and play constricted by a leash. We need more off-leash areas rather than restricting the ones that currently exist.

Having said that, dog owners should be fined if their dogs misbehave (fight with other dogs or threaten people) or if they do not dispose of poop in the required way.

Thanks for asking us to give input,

Teresa McGlashan

Correspondence ID: 1429 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 08:36:10
Correspondence Type: Web Form
Correspondence:

I am a five year member and prior club officer of FF of Fort Funston. Over those five years I have witnessed numerous negative encounters between park patrons due to dogs being off leash. I have witnessed pilots being bitten by such dogs while attempting to land. I have personally been chased numerous times by dogs trying to catch my glider, putting my landings at risk. I have contacted park police because one patron became outwardly violent towards a dog owner he thought was not properly controlling her animal.

It has become very apparent to me that "voice control" of animals is ineffective.

I support any proposal that requires dogs to be either on leash or in a

specifically designated and properly enclosed play area. The current policy, and any policy that relies upon voice control to manage the animals within the park is in my opinion ineffective and creates unnecessary safety hazards to park patrons.

Allen Justh 2010 President, Fellow Feathers of Fort Funston

Correspondence ID: 1430 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 00:00:00
Correspondence Type: Web Form
Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 1431 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 12:40:24
Correspondence Type: Web Form
Correspondence: Please do not restrict the off leash areas for our dogs any further. San Francisco has been such a fantastic place to live because of its natural beauty and its ability to be a family oriented place with dogs. I think we are like most people in this city in that our dogs are our kids. Unfortunately, most of our friends move out of the city when they have kids or get ready to have kids. Thus making San Francisco a city with more dogs than kids. If you are not only driving out families with children but also driving out families with dogs we are going to be left with a city that has a tough time moving forward. Dogs in the city and its parks have become a staple to the

atmosphere, economy, and social scene.

It is imperative to the health of the city to keep dogs welcome and encouraged for all they bring to our city and our economy!

Please do not limit the off leash areas for our dogs any further.

Thanks for your time

Johnny Eason

Correspondence ID: 1432 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 12:57:46
Correspondence Type: Web Form
Correspondence: I am an outdoor person and I very often run at Crissy Field in S.F. As often I also take my kids there to walk on the beach or on the main path. The beach is full of dogs running around and their owners throwing the balls to them. It feels that we humans have been intruders. Some of the dogs are big and wild, I often fear for my kids' safety. Several years ago, while walking with my 4-year-old on my shoulders at Ocean Beach in S.F., a dog ran toward me and bit me. I received 5 stitches on my leg at the nearest emergency room and a \$500.00 bill. I am an Italian-born American citizen and I travel often back to Italy. There, dogs are kept on the leash in every public place and often restrained on beaches for sanitary reasons. I wish the same thing was happening here.

Correspondence ID: 1433 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 13:00:21
Correspondence Type: Web Form
Correspondence: Recently released research-based information about dog walking and health makes it clear there are real benefits to our well-being.

These two quotes from the 3/22 2011 NYT Health Update illustrate the point: Just last week, researchers from Michigan State University reported that among dog owners who took their pets for regular walks, 60 percent met federal criteria for regular moderate or vigorous exercise. Nearly half of dog walkers exercised an average of 30 minutes a day at least five days a week. By comparison, only about a third of those without dogs got that much regular exercise.

To the surprise of the researchers, the dog walkers showed a much greater improvement in fitness. Walking speed among the dog walkers increased by

28 percent, compared with just 4 percent among the human walkers."

So no question our dogs are very important to our health. That brings us to the question of our importance to our dogs health. Their exercise is essential to their mental and physical health. On leash and free play in dog parks are great benefits. But off leash walking is at least as important for their development and good health.

Like their owners, dogs require daily exercise and socialization for good mental and physical health. This cannot be achieved inside a house or apartment or, for most dogs, on a leash or in an enclosed dog pen. Responsible dog ownership requires teaching the dog to behave appropriately among other dogs and with people. And exercise means more than walking at human pace. Indeed, for the elderly or disabled, it is even more important to be able to exercise one's dog off-leash; it can be detrimental for both owner and pet to be restricted to on-leash activity only. Dogs behave entirely differently when they are restrained (think about how aggressive chained dogs are).

The SF Pet Owners have done an excellent job defining the various options for shared use of space by LL park users, debunking some of the myths about damage to habitat, etc., and proposing options for successful shared use policies.

I expect you to broaden your definition of park users to include dog owners, accept our interests as critical to your success as a community recreation area, and act accordingly, making sure our needs are met along with others'.

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| Correspondence ID: | 1434 | Project: 11759 | Document: 38106 |
| Received: | Mar,24,2011 13:16:12 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I object to the language usage in this document. The DEIS report consistently uses the word "may" in attempting to provide evidence to support reasons to restrict off-leash dog walking. For example: (p.281, para. 2) "The natural sounds heard in GGNRA are a positive and valued park resource, which dog presence or barking MAY interrupt." Page 281, para. 3 states: "Some ethnic or low-income populations MAY be more negatively affected by off-leash dog walking." The American Heritage Dictionary of the English Language, 3rd Edition, defines "may" as "an indication of a certain measure of likelihood or possibility." The DEIS fails to provide a description of what that possibility is and what evidence they have to support that likelihood. I recommend that every time the word "may" appears in the DEIS, it be changed to "will", and then cite factual data to support that assertion. | | |

Correspondence ID: 1435 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 13:56:27

Correspondence Type: Web Form

Correspondence: San Francisco needs areas that allow dogs off leash. Running dogs on the beach is part of the SF experience. While we don't have a dog, we enjoy watching the big dogs run in the waves. I have a small child and we use the GGNRA regularly. I am very concerned that if you close the offleash areas then there will be more conflict between dogs and kids. As it is they are fairly separate, but make the dogs go on leash and they will move from the waters edge, and on to the walks with the strollers. NOT GOOD. I prefer the dogs playing with each other, tiring each other out, not on the paths getting tangled up and knocking my child over.

It works fine the way it is except for a few irresponsible individuals, and these won't stop because you change the rules. People on the beach always when the patrols are coming, you won't stop them.

So what is this all about anyway? Revenue? Anti-dog? Just to make the rules the same as other parks? GGNRA is NOT other parks. It is my understanding that free dog areas where part of the agreement that transferred the land to the GGNRA. Why renig on the deal?

I just don't get what you are trying to do.

Correspondence ID: 1436 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 14:29:20

Correspondence Type: Web Form

Correspondence: I support option C

Correspondence ID: 1437 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 14:35:58

Correspondence Type: Web Form

Correspondence: I understand the need to balance the environment with needs of the dog owning population. Perhaps there even need to be some guidelines people should follow. But off leash areas on the beaches in other parts of the GGNRA lands is vital to the thousands of dogs and owners in San Francisco. I run with my dog, who happens to be blind, and that is the way he (and I) exercise. But he can't run on leash and so this restriction would be devastating. Also, there are many people who simply wouldn't get outside in nature without their dogs. it is vital for their physical and emotional well being. I urge you to use common sense and not take draconian measures.

Correspondence ID: 1438 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 15:04:58

Correspondence Type: Web Form

Correspondence: I am writing to offer my reaction to the GNRA Dog Management/EIS plan to exclude all dogs from 'New Land" which would apply to Rancho Corral de Tierra property near Montara.

I am whole-heartedly against this policy. I live in Montara and part of the charm to this wonderful small town is the ability to take my dog for long walks in open space. This is where I see my neighbors and chat with friends. After a long day, my dog and I take our daily walk to enjoy the scenery and relax a little. What I'm trying to convey is that though this area is a part of the expansive GGNRA, it's not a densely packed urban area. Rather it is a large part of our small community where bikers, walkers, equestrians and dog walkers have successfully co-existed without government oversight for many years. A ban on dogs is plainly unfair and out of touch with the needs of our community.

I am asking you to please reconsider what appears to be very heavy-handed regulation of a local neighborhood treasure. 'Parks to the People' should include EVERYONE including those of us who own dogs.

Deborah Mortensen, Resident of Montara, CA

Correspondence ID: 1439 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Off lease dog walking is healthy for both dogs and people. Please work to keep it legal.

Correspondence ID: 1440 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 16:14:06

Correspondence Type: Web Form

Correspondence: We need to save the off leash areas in all the Golden Gate Rec areas in the bay area. My dog thanks you for your cooperation and support.

Correspondence ID: 1441 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 16:44:13

Correspondence Type: Web Form

Type:

Correspondence: Thank you for the opportunity to comment on the GGNRA draft dog management plan.

I have a well-behaved young dog, who I have attended 5 obedience classes with, and with whom I am currently working to attain a Canine Good Citizen certificate, issued by the American Kennel Club. I have devoted many hours to the training of my dog so that our family has a reliable companion, and so that I know with confidence that he is trustworthy in public. Besides the daily interactions my dog experiences on the street with people and other dogs, my dog comes to work with me every day (we are small business owners in SF) and also to my son's school at drop-off and pick up time. It is extremely important to me that my dog is gentle, obedient and well-mannered in all situations. I'm proud to say that he is.

Part of the reason my dog has been so successful in his training is because he has had wonderful opportunities to be responsibly off leash. We walk twice a day, religiously, so that he gets plenty of exercise to be healthy and calm in all social situations. Off leash time is critical for a city dog; we don't have the luxury of a yard (as many people in San Francisco don't), so it is vitally important that I can take him to a place where he can run and play and be a dog. He is a one and a half year old standard poodle; he has lots of energy to burn! I know that I can call him and he will return to me immediately to walk at my side, wherever we are.

I don't take our off-leash privileges lightly; I always clean up after my dog, and make sure that my dog is entering a safe environment when I take him off leash. I ask him to sit when other people walking in the off leash areas stop to say hello to him (and many do). The GGNRA has provided all of the members of my family (human and canine) with a wonderful way to be in nature and appreciate the place we live even more. Please don't take that away from us.

Thank you.

Correspondence ID: 1442 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 16:57:26

Correspondence Type: Web Form

Correspondence: We want the GGNRA to remain open for people with dogs and off-leash dog walking. The GGNRA needs to stop pushing its extreme proposal to cut nearly 90% of currently available off-leash areas.

The GGNRA is an urban recreation area, created for the "maintenance of needed recreational open space." This extreme proposal (Draft

Environmental Impact Statement) -- a plan that would eliminate a primary form of recreation from this "recreation area." The GGNRA has an obligation to respect the legislation that created it and manage the areas as an urban recreation areas, not a pristine wilderness.

Please follow the GGNRA's 1979 Pet Policy as Section Seven Special Regulation, mandating that all properties added to the GGNRA after 1979 should maintain historical recreational access.

Correspondence ID: 1443 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 17:40:23
Correspondence Type: Web Form
Correspondence: I strongly oppose the GGNRA Draft Dog Management Plan. I believe it to run counter to the spirit and intention of the GGNRA. The Plan is unnecessary and serves no legitimate purpose. Rather it diminishes the quality of life which is a long standing San Francisco and Bay Area value.

Correspondence ID: 1444 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 18:00:27
Correspondence Type: Web Form
Correspondence: Thumbs up on the Draft DMP! This is a comprehensive and well-thought-out plan worthy of adoption. I support the provisions called for in the plan, with the exception that I believe it makes sense to construct a fenced, rather than unfenced, off-leash area at Crissy Field. The "cultural preservation" argument to me carries little weight, considering the area was once marshland. True "preservation" would restore this area to its former marsh condition, but we all know that ain't happening! As the plan correctly points out, the area is currently underutilized and would make a good off-leash area. Fencing would help confine dogs to this less sensitive area and help keep rogue dogs out of the tidal and beach areas. Fencing would also offer an unambiguous delineation between off-leash and on-leash areas, making enforcement easier for park staff.

I am a beach & park user, bicyclist, jogger, kayaker, rollerblader parent and voter. I don't have a dog, but I still vote!

Correspondence ID: 1445 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 19:06:44
Correspondence Type: Web Form
Correspondence: My wife and I are both seniors and one of our great joys is to take our well

trained Jack Russell Mix to Ocean Beach or Fort Funston to let her chase after a ball. It reminds us of when the kids were young.

Please don't take away our recreation, exercise and fun by severely restricting dogs from Ocean Beach and Fort Funston.

One of your proposals I strongly support and that is to control dog walkers. They bring 5 to 10 loosely managed dogs to Fort Funston. While some of the more responsible ones try to clean up after the dogs. Far too many look the other way.

I think dog walkers need to be licensed and required to attend classes on how to manage dogs in large packs. Limiting dog walkers to no more than 4 dogs would be a good first step plus requiring licenses and permits.

Correspondence ID: 1446 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 19:12:37
Correspondence Type: Web Form
Correspondence: I love having the option of walking with our well trained small dog on the trails at Lands End. She does not bother other wild life, walkers, runners or bikers.

Lands End is a joyous place to walk with our dog. She gets a chance to smell flowers and walks close to our side. But at the same time she feels free not being on a 6 ft leash.

Please don't ban well behaved off leash dogs from the Land's End Coastal Trail. Maybe a occasional enforcement would help send the message to the few bad apples I have observed over the past years.

Correspondence ID: 1447 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 19:18:15
Correspondence Type: Web Form
Correspondence: I have been a resident of San Francisco for 10 years and a dog owner in SF for almost 8 of them. I've always loved that San Francisco was 'dog friendly' and had off leash areas for dogs to run. I have a large dog who requires lots of running for exercise, which would be impossible on leash. I am a responsible dog owner and have taken him through two puppy training and one adult training class. And I clean up after my dog. I've read through the proposal; it is hard to follow, but it seems to restrict off-leash areas significantly. We regularly visit Fort Funston, Ocean Beach and Crissy Fields. While I understand there could be some environmental impact, if

dog owners are responsible, it should be minimal. In all my times to 'off-leash' areas, I've never witnesses any issues. Also, I am not a dog walker, but am a small business owner. Reading the restrictions of off-leash areas as well as the restrictions placed on dog-walking, I see an immediate negative economic impact. Dog Walkers are needed in San Francisco. Dog walking rates are signifcant and with the proposed restriction, you would see a significant increase in prices and also a decrease of dog walkers (or they will go out of business). Please keep the off-leash areas available!

Correspondence ID: 1448 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 19:54:18

Correspondence Type: Web Form

Correspondence:

I am a native California that grew up on the coastside. I am a dog owner, donor to the parks, and a voter. When I was a kid, off-leash was not even something that was discussed because people and their dogs just simply "hung out" on the beach or at the park. For a state that has always had a reputation of being so laid back, I am appalled at all of our regulations that I have watched unfold over time. It has become so disheartening, that I have become another native Californian who is starting to think why do I want to live here or pay taxes to this state? There are other places much less regulated. You may be thinking so what? But what will happen when you start chasing out all of the middle class income earners? We are your tax base and you know it. The only tax increase I ever vote for is the parks. If you take away my motivation to use them, then why will I ever agree to give more?

My husband and I frequent many of the beaches throughout the summer and have never had a complaint about our dogs. If anything most people want to say hi. There is something very American about watching adults, children, and our beloved canines frolicking in the surf together. And from my experience dog owners are usually the most conscios about picking up after themselves. Have you noticed how many people are at these parks with their dogs? We are the ones that use them. Please keep the parks off-leash. Thank you!

Correspondence ID: 1449 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 20:01:04

Correspondence Type: Web Form

Correspondence:

This is very unfair because this is some of the only places a dog can swim, run, and socialize! Plus most of the time there are more dogs on the beaches then people! My dog loves it here and needs this place and so does every other dog. Also what you should realize is that this will make less supporters

for the GGNRA and the National Parks where the beaches are located. I also think that some other major things have not been thought about. One is that, can't humans hurt the birds too? But you wont ban people from the beaches will you? So why ban the dogs who seem to have more fun on the beaches? I hope whoever is deciding, that they own a dog and they know just how much this is going to hurt the society!

Correspondence ID: 1450 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 21:45:27

Correspondence Type: Web Form

Correspondence: The GGNRA was created for urban recreation. It has a long tradition of promoting mixed-use activities. It is not a pristine wilderness.

We need places for healthy recreation around our cities, and this includes dogs. The existing regulations should be enforced without adding more restrictions on dogs.

The GGNRA already has large areas of land that are not near a trail, and those areas will remain undisturbed, even under present regulations.

Any new lands added to the GGNRA should also be designated to allow dogs on trails.

Correspondence ID: 1451 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 22:06:01

Correspondence Type: Web Form

Correspondence: I am very concerned that NPS/GGNRA will ignore public comment. For this process to be considered valid, you must be transparent. I strongly request (insist if I may) that you publicly publish all comments received.

Correspondence ID: 1452 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 22:19:55

Correspondence Type: Web Form

Correspondence: The GGNRA DEIS Dog Plan does not present an objective case for making any changes to existing dog policies. Thus, the entire DEIS should be rejected or completely re-done.

To suggest such impactful changes, GGNRA must, at a minimum, provide quantifiable data showing: a) why dogs (on or off-leash) are a priority problem (i.e., greater than the other impacts) b) the projected benefit of

GGNRA recommendations over other measures

Correspondence ID: 1453 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 23:50:15

Correspondence Type: Web Form

Correspondence: I am a dog lover, a dog owner, and a birder. I have gotten many emails urging me to comment on this proposal, both from fellow dog owners and from fellow birders. My dog is very active and high-energy and does not get much exercise on-leash. She loves chasing tennis balls and frisbees and needs off-leash time.

However, I feel very strongly that wildlife protection is paramount. Humans and our pets have had devastating impacts on wildlife. The snowy plover, in particular, has suffered serious declines due to human activities. We residents of the bay area are fortunate to have many areas for recreation. In my view, preserving and protecting sensitive wildlife is far more important than providing a few additional recreational opportunities for humans and their pets.

I generally support the preferred alternative, with the following caveats. I would fence the areas where dogs are allowed off-leash, and I would provide for strict enforcement. The preferred alternative speaks of ease of enforcement, but I did not see any discussion of what enforcement efforts will be made, nor what resources will be provided for enforcement of regulations. Strict enforcement, particularly in the areas where dogs are prohibited, is essential for success of the proposal.

Knowing that there are far more dog owners and dog lovers than birders in the bay area, I fully expect that there will be many, many more comments urging fewer leash requirements and more off-leash areas, than those supporting wildlife protection. It is precisely that -- the huge numbers of dogs and dog lovers (not to mention cats) -- that has caused such severe impacts to wildlife, and to birds in particular. I trust that your decision will be based on the severity of impacts caused by off-leash dogs, and on the sensitivity of wild species to the presence of dogs, rather than on the number of comments supporting or opposing off-leash dog areas.

Thank you for consideration of my comments.

Correspondence ID: 1454 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 23:56:51

Correspondence Type: Web Form

Correspondence: Please save the off leash parks. My lab would be so sad if he couldn't run free. I'm a good dog owner and always pick up after my dog. I have voice command over my dog at all times. It would really impact our weekends if we couldn't take Tucker to Crissy Field. thank you, Aubrey

Correspondence ID: 1455 **Project:** 11759 **Document:** 38106

Received: Mar,25,2011 00:00:15

Correspondence Type: Web Form

Correspondence: The restrictions on Fort Funston are too severe. Fort Funston is one of the precious few places the thousands of dog owners can currently take our dogs to exercise freely, and the proposed restrictions bans all dogs from over 80% of that area, concentrating us all in the remaining 15-20%, thus severely increasing the risk of conflict and overuse of the land.

The restrictions on Ocean Beach are too severe. The stretch of beach south of Judah and north of Sloat is used most heavily by local residents who exercise their dogs there (myself included), and should be included as a ROLA, as the potential for conflict with "those wanting a no-dog experience" is minimal.

As has been stated by others (and with which I wholeheartedly agree): The GGNRA is located in a major urban area with minimal open space, so these restrictions will have a dramatic impact. The plan ignores the negative impacts of the proposed changes on neighboring city parks, on the health and well-being of people who enjoy recreational dog walking, and ignores the recreational values that are part of the GGNRA's original mission ("to provide for the maintenance of needed recreational open space").

As a passionate San Francisco citizen and dog owner, I sincerely ask you to reconsider.

Correspondence ID: 1456 **Project:** 11759 **Document:** 38106

Received: Mar,25,2011 09:52:40

Correspondence Type: Web Form

Correspondence: I must admit I did not read all of the information. However, I feel we should be able to walk our dogs under voice control in all the areas that you mentioned. Dogs need this for their survival, and dogs are very healthy for our survival. It is coming out more and more how they help us heal. They are used in hospitals, nursing homes and prisons. That said, they should not be unruly. If they are, then deal with that individual dog.

Correspondence ID: 1457 **Project:** 11759 **Document:** 38106

ID:**Received:** Mar,25,2011 10:00:15**Correspondence** Web Form**Type:****Correspondence:** I have an active Jack Russell Dog---We do flyball and agility. Every day I walk and she runs for the ball. I am 65 and it really keeps me active as well as my dog. Off leash areas are getting harder to find wherever we go in California. My problem is all the dog walkers that don't control their dogs, especially at Fort Funston and Crissy field in San Francisco. Most of them don't even bother to pick up after their charges because they don't keep track of them. Please don't punish all of us for the mistakes of a few.

Correspondence 1458 **Project:** 11759 **Document:** 38106**ID:****Received:** Mar,25,2011 10:54:54**Correspondence** Web Form**Type:****Correspondence:** i have lived in the moss beach-montara,ca area for 36 years and have enjoyed my hassle free hikes on the many trails along the slopes of montara mountain. i own and have owned dogs that i have always shared my walks with for many-many years. believe it or not i have never encountered a problem or complaint about my dogs through all this history. on the lower slopes of montara mountain i would honestly estimate that eighty to ninety percent of the walkers have dogs accompanying them, and never a problem. the higher terrain and trails of montara mountain has a different mix of users,(mountain bikers,solo hikers,couples, and small groups of hikers). so i am a strong supporter of continued dog friendly attitudes and rules in this area. sincerely, kenneth bergerson

Correspondence 1459 **Project:** 11759 **Document:** 38106**ID:****Received:** Mar,25,2011 13:16:22**Correspondence** Web Form**Type:****Correspondence:** I would like to voice my support for the GGNRA Dog Management Plan. I believe that bio-diversity is important and needs to be protected, despite the very vocal concerns of pet owners.

Thank you for your work.

Correspondence 1460 **Project:** 11759 **Document:** 38106**ID:****Received:** Mar,25,2011 13:20:53**Correspondence** Web Form**Type:****Correspondence:** We are a dog-loving family who live in Cupertino, and often set Fort

Funston and Crissy Field as heavenly destinations for our energetic and friendly little cockapoo. The parks afford good exercise for us all and soul-refreshment for the humans. In all the years we have been driving up to San Francisco to enjoy Fort Funston and Crissy Field, we have been impressed by the conscientiousness of the dog owners and the admirable behavior of their pets. The grounds are amazingly clean of doggy-doo, the dogs are encouraged to be friendly and obedient, and human conversations around the watering holes have been congenial. To be frank, we do not understand why, after all these years of thoughtfully sharing these resources, there is a movement to restrict these parks against dog owners and their pets.

We wish to register our strongest opposition to the proposed changes in access to and use of Fort Funston and Crissy Field and to add our voices to the hundreds of others who also value these resources for healthy and positive canine/human interaction.

Correspondence ID: 1461 **Project:** 11759 **Document:** 38106
Received: Mar,25,2011 13:36:00
Correspondence Type: Web Form
Correspondence: This is a ridiculous plan.

As a lover of the GGNRA and the amazing outlet it provides to all people and pets, and as the owner of one dog and two kids, I ask that you reconsider and amend this plan.

I am all for giving dogs the freedom to roam where people roam, and perhaps we just need to hold owners more accountable their dogs around more public areas. That doesn't mean that dogs should be prohibited from roaming free in certain areas. It just means that the owners should be held to higher standards (and greater consequences).

People should worry more about the bicyclists who come close to running over people in this town. Please don't turn SF into just another city.

Correspondence ID: 1462 **Project:** 11759 **Document:** 38106
Received: Mar,25,2011 14:56:59
Correspondence Type: Web Form
Correspondence: Keep Leash laws reasonable. Misbehaving dogs disallowed. Responsible dog owners and responsible trained dogs are not destructive.

Correspondence ID: 1463 **Project:** 11759 **Document:** 38106

Received: Mar,25,2011 15:42:26

Correspondence Web Form

Type:

Correspondence: Dear N. Park Service, I support the ban on dogs in the National parks including Muir Beach and the as proposed for the rest of the GGNRA. Thank you Sincerely, Jim White

Correspondence ID: 1464 **Project:** 11759 **Document:** 38106

Received: Mar,25,2011 16:23:22

Correspondence Type: Web Form

Correspondence: Please keep Fort Funston open to off-leash dog walking!

Correspondence ID: 1465 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,25,2011 18:21:44

Correspondence Web Form

Type:

Correspondence: In almost all areas the Park Service is proposing to force dogs (on and off leash) into smaller areas. Anyone knows that this will lead to an increase in the small number of dog-related issues. Hence the preferred plan is utterly illogical.

Why would the Park Service Prefer to see an increase in dog-related issues? I could cynically suggest that the Park Service wants to see an increase in dog related issues so that five years from now they can use those statistics as proof of the need to ban dogs entirely. If this really is the hidden agenda of this report then it is shameful.

In any event the preferred plan is utterly disrespectful of the access rights of a large proportion of the park-using public. The preferred plans take away huge amounts of access rights. This is totally against the mandate of the Park Service. Leave things they way they are please and stop eroding our access rights!

Correspondence ID: 1466 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,25,2011 22:06:39

Correspondence Web Form

Type:

Correspondence: I am writing in support of the GGNRA Draft Dog Management Plan / Environmental Impact Statement. Specifically, my focus has been on Fort Funston. I attended the comment period at San Francisco State on March 5th and appreciated the time I had to meet and speak with rangers and professional dog walkers.

I ride horses out at Fort Funston and access the trails, beach and Fort

Funston three times a week. I grew up in San Francisco and walked our family dogs at Fort Funston in the 80s and 90s. Even now, I frequently dog sit for friends and visit Fort Funston on foot. The change in the habitat there is depressing. Seeing dogs harass the dwindling bird life is very sad; watching people not pick up after their dog is enough to make me go nuts. The lack of cooperation and understanding of shared open space has been a source of great frustration for me. Over the last ten years, I have witnessed three accidents involving dogs and horses. One involved the rider being hospitalized. One involved the death of the dog. For these reasons, I am firmly in support of all that the GGNRA Draft Dog Management Plan is attempting to do. I feel that Alternate C is a compromise for everyone but is much better than the status quo. I firmly support ongoing dialogue and clearer policy.

With that in mind, my biggest concern is a lack of signage that alerts people to the park's boundaries and the laws we all should follow. And what about charging people to park their cars at Fort Funston, a means to collect funds to help pay for signage and habitat restoration?

I am also in support of ROLAs being rotated so the land is not overused and if conflicts arise, an on-leash policy being implemented. That is safer for everyone. I am also in favor of fenced in dog run areas as an alternative but I feel that Alternate C is a much better direction to take.

Thank you,

Lisa Dunmeyer

Correspondence ID: 1467 **Project:** 11759 **Document:** 38106

Received: Mar,26,2011 08:23:51

Correspondence Type: Web Form

Correspondence: I am commenting on the portion of the Dog Management Plan for Ocean Beach San Francisco. My wife and our two children have lived at 45th Avenue and Lawton for 15 years. I am strongly in favor of the preferred plan, where dogs are prohibited from the beach. Countless times, since my children were babies, we have had excursions to Ocean Beach ruined by dogs on and off leashes doing the following, among many other offenses:

1. Approaching us and angrily attacking us, running all over our beach blanket throwing sand in our faces and on our picnic food. My children were terrified while the owners look at us like it was our fault and do absolutely to control their dogs. Needless to say, our picnics were ruined.

2. Dogs approaching me with completely unknown intentions. I do not

know if they are playful or will bite me. Their owner is obviously walking hundreds of yards away, paying absolutely no attention to where their dog is located or what it is doing. Or the owner is close by looking at me like I'm a strange person to be scared of their dog.

3. Watching unleashed dogs chasing the protected snowy plover birds into the water, with, as usual, the owners not caring or calling or controlling at all. This is upsetting to me.

4. Countless times stepping on dog feces on the beach.

5. Constant loud and disturbing barking of dogs, ruining what I thought what a sensitive environmental area.

Every other national park and recreation area has strict restrictions on dogs. Why can't this be enforced on Ocean Beach? My understanding from the signs posted currently at every entrance to the beach is that for almost the entire year dogs are required to be leashed. Why is this rarely, if ever, enforced? This tells my children that laws can be fragrantly disobeyed by citizens with absolutely no consequences, day after day, year after year.

I think dogs need to be prohibited from the snowy plover protected area because if the law says a leash is required, dog owners will continue to disobey the law. Dog owners view themselves as being entitled to let their dogs run free in a beautiful San Francisco open space. I do not agree. Humans have priority over animals in our civilized society. Do we need to add this to the United States constitution to make it clear?

When illegal unleashed dogs attack humans, the owners inevitably say "oh, he's friendly, he never hurts anybody". But we have laws in this country for a reason. The vast majority of people don't drive cars drunk but it is illegal because of those who do, and the damage they cause. And most people pay attention and don't drink and drive, both for moral and legal reasons. Shouldn't dog owners obey the leash laws? They sure don't on Ocean Beach, only perhaps 10% of the dogs I see there are on a leash.

Finally, if GGNRA does implement a new dogs rule on Ocean Beach, please enforce it vigorously. Otherwise this entire process is a waste of time.

Thank you for the opportunity to comment,

I am withholding my name because I don't want angry dog owners contacting me.

Received: Mar,26,2011 14:41:51

Correspondence Web Form

Type:

Correspondence: As a daily user of Ft. Funston I will restrict my comments to the area, although they may be generally applied to other GGNRA lands. At present the park is host to a disparate range of activities from hang gliding to surfing to dog walking. The park is most heavily used by off leash dog walkers who will have no place to go if the "Preferred Options" are implemented. The DEIS has no analysis of the impact of this; it places the burden of providing exercise area for all these animals onto the city and county. The DEIS is driven by a policy exercise and minority interests. I would be in favor of Option A, no further restrictions for Ft. Funston.

Respectfully,

Steve Sowa

Correspondence ID: 1469 **Project:** 11759 **Document:** 38106

Received: Mar,26,2011 17:25:56

Correspondence Web Form

Type:

Correspondence: Taking off leash parks away is not the only answer! There has to be another way!

Correspondence ID: 1470 **Project:** 11759 **Document:** 38106

Received: Mar,26,2011 17:28:13

Correspondence Web Form

Type:

Correspondence: NO NO NO Do NOT prohibit dogs from our National Seashore. They belong here as much as do coyotes and foxes and children and hawks and eagles and osprey. Birds adapt to dogs as they do to humans and other predators and become stronger for it. I have witnessed this happen. (OVER) protecting the bird populations does NOT serve the birds nor does it serve we, the taxpayers and dog owners, who live near our parks and utilize these parks.

Prohibiting dogs from our parks will also create undue stress on park personnel who will have to devote all together too much time to enforcing these proposed dog restriction policies. Do Park personnel really want to become viewed more as police people than stewards for the Parks? Is delegating more time to law enforcement really they way park personnel want to spend their time? Don't let a few vocal yet organized people ruin it for the great majority who enjoy having pets in our Parks. These same up tight people will want to eliminate people from the parks, certainly children, for the same reasons they want to prohibit dogs from the Parks. Don't let

these people drive the park system into adopting over restrictive and unfair policies which will further make the Park system an unfriendly to people environment.

Correspondence ID: 1471 **Project:** 11759 **Document:** 38106
Received: Mar,27,2011 10:42:37
Correspondence Type: Web Form
Correspondence: In order to protect the natural resources and make for a safe and enjoyable visitor experience I strongly support Alternative D (Most Protective Based on Resource Protection and Visitor Safety).

Dog threaten the fragile eco-system by digging up fragile plants and chasing native wildlife, as well as impacting the experience of the majority of users, which do not have dogs.

I urge you to impose the most restrictive set of rules for dogs with the appropriate enforcement measures.

Regards,

Philipp Borchard

Correspondence ID: 1472 **Project:** 11759 **Document:** 38106
Received: Mar,27,2011 10:52:34
Correspondence Type: Web Form
Correspondence: Alternative C: Stinson Beach, Rodeo Beaches Alternative D: Muir Beach, Fort Baker, Homestead Valley, Alta Trail and Orchard and Pacheco Fire Roads, Oakwood Valley, Marin Headlands Trail

Correspondence ID: 1473 **Project:** 11759 **Document:** 38106
Received: Mar,27,2011 10:54:43
Correspondence Type: Web Form
Correspondence: Alternative C: Stinson Beach, Rodeo Beaches Alternative D: Muir Beach, Fort Baker, Homestead Valley, Alta Trail and Orchard and Pacheco Fire Roads, Oakwood Valley, Marin Headlands Trail

Correspondence ID: 1474 **Project:** 11759 **Document:** 38106
Received: Mar,27,2011 13:53:58
Correspondence Type: Web Form

Type:

Correspondence: Dear Mr.Dean. A short while ago I returned home from Ft. Funston, my almost daily destination to give our two dogs their needed exercise, and, also give me a chance to shake off the day. Funston is heaven for dogs and humans alike. I understand that you are trying to balance demands for preservation of natural resources with the desires of humans and their four-legged companions to retain a unique and stunning place for their recreation. Those of us who come out to Funston regularly respect the place for it's beauty and do all we can to protect it so that future generation will be able to enjoy this magnificent place as well. Please do not impose restrictions on the off-leash recreational use of Ft. Funston. We need a place like that. The city parks are not an alternative for providing us humans and our canines the exercise that we so badly need. Sincerely. Reinhold Gras

Correspondence ID: 1475 **Project:** 11759 **Document:** 38106

Received: Mar,27,2011 14:30:32

Correspondence Type: Web Form

Type:

Correspondence: DO NOT restrict off-leash dog walking at Fort Funston and Ocean Beach. A healthy, well-socialized dog needs exercise: i.e. to be able to run, chase balls, meet other pets and owners, etc. This can't be done in backyards and on urban streets. I know you probably wish all the dogs would disappear, but that's not going to happen. There are more dogs in San Francisco than children. They, and their owners deserve to have a happy, healthy life, which includes plenty of exercise.

BTW, in the 70s Fort Funston was handed over to the GGNRA with the proviso that it would continue to allow off-leash recreation. It's not honorable for you to go back on your word like this. If no dogs are allowed off leash on any GGNRA land, than you should not have accepted management of Fort Funston in the first place.

Correspondence ID: 1476 **Project:** 11759 **Document:** 38106

Received: Mar,27,2011 17:06:45

Correspondence Type: Web Form

Type:

Correspondence: Dear Sir or Madam,

We strongly support either on leash only or prohibited areas for dogs. Our experience has been that owners feel they have the right to run their animals off leash irrespective of existing law or ordinance. Off leash dogs threaten humans and other dogs and adversely affect wildlife and habitat.

Almost without exception they respond in an adversarial and occasionally

combative manner when asked to leash their animal(s). Even in those areas where signage of the on leash rule is clearly posted, non compliance is the rule rather than the exception. We would support an aggressive ticketing policy. Pacifica did this for just a short time and although there were the predictable howls of protest, compliance was noticeably improved. Sadly, once the ticketing program was abandoned, owners quickly reverted to type. Sincerely, Charles and Carol Parker P.S. Specific instances available upon request.

Correspondence ID: 1477 **Project:** 11759 **Document:** 38106

Received: Mar,27,2011 17:47:40

Correspondence Type: Web Form

Correspondence: This issue is VERY important to me and to my family. Walking our dog in GGNRA (Fort Funston & Crissy Field) is as important to us as it is to our dog. It is one of the highlights of our week and a time that allows us to be together and to meet other members of our community. PLEASE do not make changes to the current leash laws in GGNRA. Changing the leash laws in GGNRA would have an immediate and lasting effect on our quality of life in San Francisco.

-Spencer Hooks

Correspondence ID: 1478 **Project:** 11759 **Document:** 38106

Received: Mar,27,2011 18:35:04

Correspondence Type: Web Form

Correspondence:

Correspondence ID: 1479 **Project:** 11759 **Document:** 38106

Received: Mar,27,2011 19:01:52

Correspondence Type: Web Form

Correspondence: The off leash area is the only place where our dog can run full speed and play balls and get the exercise that he needs. Our dog is a rescued dog, so the off leashed parks allowed him to flourish and gain confidence as he meet other dogs,especially the people who understand dogs. We look forward to the parks each week because we live in a condo with no yard, the dog friendly parks really adds to our city lifestyle.

Correspondence ID: 1480 **Project:** 11759 **Document:** 38106

Received: Mar,27,2011 21:12:08

Correspondence Type: Web Form

Correspondence:

Correspondence: I have often been to Ocean Beach with my dog and family and enjoyed having them all with me. We get out more because of our dog. The whole idea of open space is for people to get out and use it. Dog owners and their dogs use these areas and benefit from the exercise and beauty. Dog owners are appreciative of nature and sensitive to non-dog owners. Excluding dogs excludes their owners which generally are more likely to support open space. To restrict all dog owners because of a few insensitive ones is like making the area off limits to people cause other people weren't polite. I'm not even sure why there's a possibility of restricting dogs and their owners. Is there a real problem and if so than excluding dogs and their families is too harsh.

Correspondence ID: 1481 **Project:** 11759 **Document:** 38106

Received: Mar,27,2011 21:40:11

Correspondence Type: Web Form

Correspondence: To Whom It May Concern: As a longtime dog owner, who enjoys walking dog friendly GGNRA trails, I am appalled that the interests of those like myself have been overridden by a minority of trail users. Most dog owners who use the trails pick up after their animals and are very courteous to other users such as hikers, bikers and equestrians. The actions of a few irresponsible dog owners should not be used to justify the severe proposed restrictions, just as the actions of a minority of irresponsible hikers, bikers or equestrians should not lead to curtailment of existing permitted trails for these users. I fully understand that trails close to urban areas see heavy use of sometimes competing interests, but heavy use does not justify restrictions such as those proposed by your agency. I question the validity of studies purporting to show out migration of certain species due to the perceived threat of dogs. Humans in general pose a much greater threat than any other species. I find it difficult to believe that horses, don't scare off other animals. Restricting dog friendly trails would also lead to overcrowding of the few remaining trails, leading other types of users to avoid such trails. I urge you therefore to reconsider the proposed restrictions and to develop a more inclusive option for all stakeholders.

Correspondence ID: 1482 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 09:37:37

Correspondence Type: Web Form

Correspondence: To whom it may concern: Please allow dog owners to have a place where dogs can be dogs, where they can run and enjoy their lives. Almost all the dogs that live in San Francisco live in small homes without large yards so being able to run off leash with their responsible owners is greatly important to their health and happiness. Many dog owners take the responsibility of

tending to their dogs and to the areas that they get to enjoy seriously. We all want to keep areas safe for all animals and plant life. Please keep Fort Funston and Chrissy Fields as safe places where dogs can run free and people will be responsible stewards. If you really want to restore land then maybe the GGNR should also think about taking away the golf courses that use vast amounts of water and resources that do not allow birds and natural plant life to reinstate themselves. Regards, Suzanne Castillo

Correspondence ID: 1483 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Letter

Correspondence: Here are several alternative solutions to closing trails and beaches. They are less expensive solutions for land management and people management:

1. Require and enforce people to CARRY leashes for their dogs. Monitor for voice control.
2. Require and enforce people to clean up after their dogs.
3. Limit professional dog walkers to three or four dogs per outing in all areas.
4. Add a fee onto dog licensure to pay for these services.
5. Use ticketing fees to deter irresponsible behavior. Put fees towards management.
6. Establish a complaint line.

Your proposed policies are in contradiction to the conclusions you draw in the study. To wit, you conclude that dogs have minimal impact on compacted trails. On the south loop of the Oakwood Valley Trail, where the GGNRA plans to mitigate dogs off-leash, the park service built a compacted trail (built by the Conservation Corps.) Also on the Oakwood Valley Trail, your policy indicates that you want to protect the Mission Blue Butterfly habitat. No lupine grows on either the north or south side of the loop (and I believe there was an attempt by the park service to grow lupine at that site.)

Correspondence ID: 1484 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Letter

Correspondence: To GGRNA:

My dogs and I have enjoyed the natural and man-made beauty of Fort Funston for almost 40 years. It is a magnificent area for human and animal socializing. On days when I am working, it is comforting to me that my dog walkers are with my dog there to give her the exercise and additional socialization that she needs.

My profession is a scientific-based one. We would be unable to issue reports such as yours, with your vague claims and accusations such as "may", "could", "potential" and "possibly negative." Despite the length of your report, I do not see evidence of baseline surveys 07 control groups or any of the usual criteria used in scientific studies. And yet you demand that we be "specific" in our comments!

It is unrealistic to expect urban parks to be completely wild or `natural' Even if pets were banned, would you not have some concerns with feral cats, raccoons, etc.? You claim that dogs can frighten the snowy plover. I suppose people could frighten them also. Is the next step to ban people from walking through Fort Funston? Incidentally, have never seen any of my dogs at Fort Funston or at Ocean Beach harm a bird. Nor do they trample over any fence-protected plants.

Certainly everything affects urban parks when they are used by human beings and their pets: we walk,we talk, we generate some waste. The dog owners groups have worked very hard to encourage responsible dog ownership, to clean up after the minority of irresponsible dog owners, and to protect the parks for our own self-interest. We want to extend this opportunity to do so indefinitely. People and their pets are part of our culture. Unless you intend to eventually ban domestic pets, pets and their owners must be allowed to enjoy our environment and enjoy our lives.

I respectfully ask you to reconsider the preferred alternative.

Correspondence ID: 1485 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mr. Frank Dean General Supervisor Golden Gate National Recreation Area
Fort Mason, Bldg. 201 San Francisco, CA 94123

Dear Mr. Dean:

I am writing in support of the proposed Dog Plan for the Fort Mason/Crissy

Field area.

As a dog owner who frequently walks our dog on Crissy field, I believe that requiring leashes for dogs walking on the Promenade is a plan that protects both dogs and other visitors. Also, I believe that allowing, dogs off lead on the center beach, provides a necessary, adequate and beautiful area for dogs to run free. I also agree that at least a portion of the eastern beach closest to the parking lot should not allow dogs off lead. This particularly true when in the summer months many families with small children use that beach.

Thank you for the opportunity to comment. By the way, I could never get the internet response site to work for me.

Sincerely,

John J. Phillips

Correspondence ID: 1486 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201 Fort Mason San Francisco, CA 94123

RE: Dog Draft Management Plan Dear

Mr. Dean:

I believe United States Recreation Areas serve a multitude of purposes, from recreation to habitat preservation. For this reason, I support the most restrictive of the proposals regarding dog access to and freedom in the Golden Gate National Recreation Area. Dog access to public lands is a privilege, not a right. I believe dog owners' use of these lands are superseded by the general public and especially by native species for whom contact with dogs would be detrimental. For that reason, these strong restrictions are prudent for the safety of all - people, habitat and dogs.

Thank you for considering my view.

Best,

Marshall Newman

Correspondence ID: 1487 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 00:00:00
Correspondence Type: Letter
Correspondence: To whom it may concern:

I am writing to you to voice my **STRONG OPPOSITION** to the proposed restrictions on unleashed pets in the GGNRA. I am in the parks every single day as a committed runner and I walk my dog everyday. I have lived in San Francisco for over 15 years and have never seen a single incidence of a dog destroying any park property, and in fact I have seen the opposite- many times- dog owners picking up trash and taking care of the park land we all cherish. Because we have a unique situation of having access to park land in our city, I believe that is essential that we continue to encourage dog owners to use the parks to keep them safe- the proposed leash laws will have the opposite result. In addition, most of the dog owners I know, including myself, are large financial supporters of the Parks. I have served on the committee for the Trails Forever event organized by the Parks Conservancy for the past 5 years (which has raised millions of dollars for the Parks), and this year I am working with the William Kent Society on another large fundraiser for the Parks. I can assure you that any restrictions on the current leash laws will have a **HUGE** negative impact on the financial support so generously provided by dog owners like myself.

I would be happy to discuss this further if you would like. Karen Block

Correspondence ID: 1488 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Letter

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

March 3, 2011

Re: Dog Management Plan Dear Mr. Dean:

Below are my comments regarding the "Dog Management Plan" that is currently available for public comment. I am not a dog owner. I am a resident of the Presidio of San Francisco, and regularly use GGNRA lands for hiking, biking, and bird watching.

In general, I agree with the preferred alternatives shown as shaded in Table ES-1 of the Executive summary. I feel these alternatives, if enforced, will prevent dog disturbance to wildlife in the most sensitive areas without

excluding dogs entirely from most areas.

At Crissy Field, I prefer Alternative B for the East and Central beaches because those beaches are currently receiving tremendous off-leash dog pressure, and because on-leash restrictions are more consistent with the preferred alternative along the promenade there. The decision to make the Crissy Field Wildlife Protection Area off limits to dogs is correct, and will be easier to enforce if dog use adjacent to this area is on-leash only.

For the Ocean Beach Snowy Plover Protection Area, an adjacent trail along the Great Highway is probably fine for dogs on-leash, but we must insure that this does not lead into off-leash dog use of the adjacent beach where the Plovers occur.

In general, enforcement is going to be challenging yet important. Off-leash is stated to mean under voice and sight control, but this is often not the case. Voice control is often lacking with many dog owners, and few dog owners act to prevent their dogs from chasing shorebirds, for example. For areas designated as regulated off-leash areas (ROLA), how do we define or maintain a "regulated" state if a dog does not respond to its owner?

One suggestion I have is to establish "dog-resistant" edges where a ROLA meets a more regulated site. Establishment of dense native coastal scrub and/or fencing can keep off-leash dogs within the desired area without much effort from the owner. This will prevent conflicts because dogs will be unable to easily stray into areas that are off limits.

Sincerely,

Ivan Samuels

Correspondence ID: 1489 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 3, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Superintendent Dean,

I am writing regarding the proposed resolution to ban all off-leash dog recreation at Crissy Field, Baker Beach, Ocean Beach and Fort Funston. I am thoroughly opposed to the proposed revisions to almost eliminate off-

leash dog use.

This land was turned over to the GGNRA from the City of San Francisco with the intent that the recreational use would continue as it did under the management of the City of San Francisco. This included off-leash dog use.

These areas are located in the middle of a big city. It is unreasonable to apply rules created for areas such as Yosemite and the Grand Canyon to a "national park" in a densely populated city. Bay Area residents have been coming to these areas with their dogs for as long as people have been using them.

There have been no significant problems associated with off-leash dogs. I've been going to these areas for the last 18 years with my dogs and my son from the time he was an infant. Why should this change?

Sincerely,

Anne Zelinsky

San Francisco, CA 94131

I would prefer that you do not use my street address in any public comments or made available for public review. Thank you.

Correspondence ID: 1490 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 11:31:52
Correspondence Type: Web Form
Correspondence: Banning dogs from national parks and trails is wrong. I understand having leash requirements in certain parks is necessary to maintain a sensitive eco system but to have a blanket rule of NO DOGS ALLOWED is discriminant towards each and every dog owner.

Pets are not only a responsibility they also become members of the family. And like any responsible parent it is imperative to provide a healthy rearing environment to ensure a happy and healthy existence. Part of the responsibility of having a dog as a pet is making sure your dog has regular, if not daily, exercise and most often that requires parental supervision. It is because of this relationship dynamic between a dog and their owner that discriminating against dogs implies discrimination against the owner.

The arguments proposed by proponents of NO DOGS ALLOWED are completely subjective and without factual content. We cannot continue to mandate laws based around individuals fears and personal bias' and to do so

is not only morally wrong but unconstitutional in its application.

I realize this comment is not complete in divulging all of the arguments that have been proposed thus far. However, I am happy to submit this comment as an opponent to NO DOGS ALLOWED in NPS and hope this only furthers the discussion and eventually leads to an amicable and pet-friendly resolution for both dogs and their owners.

Correspondence ID: 1491 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Letter

Correspondence: Superintendent Dean,

I think dogs should be on leash at all times. They should not be allowed to destroy habitat or frighten people who are hiking.

I was knocked over by a large off-leash dog, one in a group of three, in Sorich Ranch Park. The owners did not offer to help me up out of the ditch, but just walked on.

Having a dog is a choice. Having it under control and on leash should not be a choice.

Protect wildlife, habitat, and hikers.

Thank you,

Jamie Deer

Correspondence ID: 1492 **Project:** 11759 **Document:** 38106

Received: Mar,04,2011 00:00:00

Correspondence Type: Letter

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Bldg. 201 Fort Mason, San Francisco, 94123-0022

Dear Superintendent Dean,

I am writing regarding the recently proposed Dog Management Plan. My comments are based upon my experience in San Francisco (1948-52) and Marin County (1954-the present). I am a walker -- I walk all of the areas still.

I have experienced the increased numbers of people and dogs as I walk, as I sit, as I enjoy the area, sun myself, read a book, eat lunch...I have seen signs change regarding people and dog use in the various sites: signs protecting wildlife, signs warning of danger, signs directing the extent of dog use. I have seen many, often most, people oblivious to these signs -- dogs off leash in leash areas -- beach and trail. Dogs romping, digging, spraying, defecating; chasing birds, objects, children -- foraging from picknickers.

I wonder if people are deliberately defying restrictions or didn't observe their posting. When I have pointed out the restrictions I am often ignored.

My main position is: 1) beaches and land are primarily for wildlife 2) they are for human beings sensitive to wildlife 3) they are for humans and dogs who obey the rules.

Recently, in an area marked 'No Dogs on Beach' there were no dogs in the picnic area and 50+/- dogs and owners on the beach. There was not a Park official in sight.

Could an auxiliary (volunteer "rangers") be trained for this task?

Sincerely,

Dorothy E. Gibson

Correspondence ID: 1493 **Project:** 11759 **Document:** 38106
Received: Mar,03,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-022

Dear Superintendent Dean:

As you debate the issue of dogs in environmentally sensitive parklands, please consider the issue of service animals. Over the last few months I have had several encounters with able-bodied hikers on the main Tennessee Valley trail that claimed that their pets were "service animals" or therapy dogs and therefore, permitted on the trail. I am aware that service animals exist for disabilities other than visual or hearing impairment. However, there seems to be no system to prevent persons from abusing the privilege and claiming that any old mutt is a "service animal."

Disabled persons requesting special parking accommodations are required to register with the DMV after obtaining written verification of need from their

physician. They must then display the special blue hangtag to utilize the special parking areas. It seems that a similar system of registration with physician verified need could be adapted for service animals. Once registered, the animal could wear a special jacket or leash that clearly identifies the animal as a service animal. Such identification of these animals would relieve the disabled person from the burden of having to justify the presence of their dog in a restricted area. It would also prevent non-disabled dog owners from thinking that it really is ok to have their pet there despite what the signs say.

Please consider implementation of a program to register and identify service animals in the GGNRA. If that is not possible, then consider posting signage defining acceptable service animals (ADA definition) and that it is illegal to misrepresent an animal as a service animal.

Sincerely,

Elizabeth Schriock Mill Valley

Correspondence ID: 1494 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Delivered by Hand at the GGNRA Open House San Francisco State University

March 4, 2011 Frank Dean General Superintendent Golden Gate National Recreation Area Building 201 Fort Mason San Francisco, CA 941123-0022

The DEIS Draft Proposal Fails to Document How The Costs for Each Alternative Were Calculated

Dear Mr. Dean,

I am late coming into this public debate about the draft DEIS Proposal and have not yet completed my reading of all 2400 (!) pages. However, I want to provide an immediate response to one obvious lack within in and to alert you to my intention to file letters that address with particularlity each failiure to provided substantial documentation on every point raised within its pages.

The immediate point on which I found no documentation or detail was on how the GGNRA arrived at the four different cost projections related to Alternatives A to E. The figures given were so specific this reader wonders where are the accounting breakdowns that would allow the public to

compare the fiscal impact on the GGNRA (tax dollars at work again) of each Alternative. And I at least was appalled to note that the difference between what is currently spent by the GGNRA under the current plan is less than any of the other Alternatives by between \$1,308,659 and \$881,748! Perhaps if budget for the current alternative GGNRA was increased, it would allow GGNRA to resolve some of the existing problems which exacerbate the singular issue on which the draft focuses. To name three that are obvious: failiure to maintain signs, post easy to read maps or maintain the protected areas with fencing that is cleared as needed of the sand that drifts constantly - courtesy of Mother Nature, not on or off leash dogs!

At a time when fiscal reassessments and budgetary limits are being forced on us right, left, and center, I seriously question the rationality or timeliness of your decision to overhaul the entire Recreational Area (note, not Wilderness National Park land) at this time.

Sincerely yours,

Judith Hedgpeth

Cc: Minority Whip Nancy Pelosi Sec. of the Interior, Ken Salazar Senator Barbara Boxer Senator Diane Feinstein State Senator Mark Leno Assemblyman Tom Ammiano S.F. Supervisor Scott Weiner

Correspondence ID: 1495 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Hello All-

This is the first time I have been so prompted to write members of government to be heard about the draft that has been created to prevent dogs from going on (leashed and/or unleashed) certain National Park Land. I have read the executive summary and really understand the conflicts that can arise from dog lovers, other civilians, children, older members of society, and the desire to keep wildlife available and cared for by the Parks and Recreation.

The issues I have seen are irresponsible dog owners who let their rambunctious barky dog run and jump on people and put their dogs in bad situations if the dog is in any way aggressive, or running into wetlands that need protection. We all want safety and all want everyone to work well with one another, right? It seems the logical solution no matter what: if a dog misbehaves then they will be sued by the victim and/or fined seriously by

the Parks and Recreation. If they don't get fined, they should. Serious repercussions should occur or someone won't learn the lesson. A formal complaint can be filed and dealt with. People are very good at handling their own squabbles in San Francisco and if it gets bad enough, the dog will be taken away from the owner or put down (god forbid). 99% of bad dog behavior is bad dog training. There are a lot of people who don't know anything about dogs, but love having them. It's their job to take care of their dogs properly, just like their children. I will admit that my dog started having aggressive behavior and I immediately nipped that in the bud with more formal training and actually working on getting my dog training certificate from ABC. Not all will ever go to those lengths, but dog owners have to be responsible or should not play the game.

So, here's the question: how can the responsible owners still get the use of these parks with their dogs and enjoy the day? In San Francisco there are few places where dogs can run, be free and play with their dog friends. They can't always keep their dog at home, cooped up, and owners don't always want to be strict and serious with the leash all the time, either. That isn't the point of having a dog. It's their companion and their buddy and they want to share in the experiences of the outdoors. Dogs need to run and be free and be properly trained for voice recall and non aggressive. If they can't do that: fine them seriously on a case by case basis. But please don't blanket limit the already limited places dogs and their owners can go. It's hard enough!

I have already found it quite limiting in Marin County, because of the many trails that don't allow dogs period, not even on leash. My dog is well mannered and if there is someone who comes by on a trail, I take hold of his collar and have them walk by. Not all people are dog lovers and one never always knows what any interaction will be between 2 beings. If something comes up, I take care of it with respect for others, grab his collar, let the people go by, and then when the coast is clear, let him run about, as he is supposed to do.

Suggestions:

On narrower trails to prevent dogs from causing erosion and nature disturbance, I understand to have a leash law. I would even ask to have all trails open to dogs with leash law. Tam valley is practically all off limits for me and Tucker on the trails.

On wider trails: fire roads, no leash but voice command required. If someone complains or is caught with a misbehaved dog: fine them!

On Crissy Field/beach areas: have an area for dogs, and maybe dogs only with adults. It is already hard enough to get to a place for them to roam without restrictions. All beaches should have an off leash law, in certain

areas. If a dog misbehaves: fine them!

As it has been already hard to enforce the already existing laws, it seems that more signs and more rules are expensive and are not working. So, if dog owners need to have a special dog ownership card and have them pay more for being in the parks, I am completely ok and happy to do it. \$200 a year or so is a small price to pay to keep things open and have fun with my dogs, and meet other dog people and be social. It is a lot of fun, and I have not found many instances where people have not been able to handle their differences directly. And if an area needs to be protected for hatching birds and the like: fence it off or have a sign and a big fine notice.

Money always talks and if people really want the privilege then why not have them pay for the costs associated with it?

I certainly will.

Thank you for reading!

Best,

Meredith

"The mind is everything. What you think you become." -Buddha

Correspondence ID: 1496 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank. Dean General Superintendent Golden. Gate National Recreation Area Bldg 201, Fort Mason San Francisco, CA 94123-0022 March 2, 2011

Ref: Dog Management Plan and Draft EIS.

Dear Mr. Dean:

For minimum public safety any dog in the National Park should be on a leash.

There should be no off leash areas for two reasons: first, as you know, many dog owners will abuse that privilege by allowing their dogs unleashed into leash areas.

Second, dogs are animals and therefore totally unpredictable, as anyone who has been around them and whether bitten or not, can attest. Even when on

leash they injure people, particularly large size dogs that owners cannot control. For that reason I believe the study is remiss in not addressing the hazard of large size dogs in the park.

Sincerely;

Charles P. Burns

Correspondence ID: 1497 **Project:** 11759 **Document:** 38106
Received: Mar,04,2011 00:00:00
Correspondence Type: Letter
Correspondence: Subject: Dog management plan/ draft environment impact statement

Thank you for sending me your report for me to review before presenting to the public for further comment. I have made a great effort to comprehend the large volume of text, plans, alternate plans and maps. I look forward to the public forum that will be held at different locations and plan to attend them and to comment on this report. Without wasting a great deal of time I must state that I find this report to be purposely written to confuse the general public and to present a predetermined plan prior to its release. I say this because I find several elements to be unfounded and actually inaccurate historically and scientifically. While I do not hold a degree from a University I have spent my life observing and exploring my environment and as a lifetime native of the Bay Area I feel I possess an actual knowledge of equal or superior ability from hands on experience.

While the bulk of the report deals with the conflict the park service has had with the difference of a newly formed recreation area and a national park it is apparent the park service has not recognized there is a significant difference. The GGNRA is in fact a park of the People and was formed to serve all of the people, dog owners, non owners, and general dog haters. Thus the issue came to a head in 1979 and as ordered by a Superior Judge a new dog management plan was adopted. Setting forth the recognition of the basic difference of the recreation area and the national parks. The basic problem became evident when the Judge observed the loss of liberty of some and the favorable treatment of others. It would now appear that while we have been living with each other we are now returning to basic point of who actually owns the GGNRA, the people or the park service.

The Judge made his decision on the basic language of the formation of the GGNRA by Rep. Burton and signed by President Carter that the encompassing area be left as is for perpetuity. And thus we have what is commonly known as the Grandfather Clause, and specifically interpreted that dog walkers would enjoy the privileges they historically had. It would

logically follow that any and all further acquisitions to be included in the GGNRA would also meet that mandate. This is addressed in this report that any new areas would fall under the national park service 36 code. This certainly violates the basic language and more specifically the spirit and intent of the law that formed the GGNRA. It is also not as encompassing a report of the areas in Pacifica because of the callus view of park rules and how the new addition of areas would be regulated. Thus eliminating the peoples right to use the Grandfather clause when they have historically enjoyed these lands. It further states that the area to be included have been under restrictive dog policies as to leach rules or off leach rules. This is absolutely inaccurate and a fallacy as I have hiked these hills and the San Pedro point for over 34 years. I and several generations of dogs have enjoyed off leach walking and would like to continue this privilege if these areas are included in the GGNRA. Thus I must demand that the Grandfather Clause be recognized in these additions as it has been since the formation of the GGNRA. I also must submit that the only viable alternative in the offering in the report be the alternative A or the basic 1979 park management plan as the best and least intrusive plan for the people and the environment. I also find it hard to comprehend that this abbreviated section for Pacifica has no other, alternative plans and refuses to consider our off leach rights we have enjoyed, again violating the intent and spirit of the formation of the GGNRA.

Thank you for allowing me the opportunity to help you with forming and managing our recreation area.

Dan Wells,

| | | | | | |
|-----------------------------|----------------------|-----------------|-------|------------------|-------|
| Correspondence ID: | 1498 | Project: | 11759 | Document: | 38106 |
| Received: | Mar,04,2011 00:00:00 | | | | |
| Correspondence Type: | Letter | | | | |
| Correspondence: | March 3, 2011 | | | | |

Dear Kind Folks at GGNRA,

First, I want to commend you on your good faith efforts to remain even handed and open minded regarding the allowance of dogs on GGNRA lands.

Second, I want to remain anonymous out of fear of some sort of backlash from those who are so determined to have dogs remain on these lands as at the present time.

I have lived in Marin County since 1992 and in San Francisco before that

since 1980. I can count on one hand the number of times I have frequented the beaches out of a fear of dogs either jumping on me or stepping in their poop. I don't doubt the sincerity their owners but voice command has not proven to be effective in my experience. Nor do I see owners offering to pay the cleaning bill for my clothes when soiled by their dogs as their owners cheerfully say, "Oh, he won't hurt you. He's friendly." That is immaterial to my experience as they jump on me.

More to the point, GGNRA does not belong to the Bay Area residents alone. We are hosts to the world and guardians of a very special place with unique flora, fauna and wildlife. As residents of our individual communities, it is our responsibility to attend to our unique needs as a community. We have no business encumbering the federal government with our personal desires.

Please file this letter in the pile in support of the fair-minded efforts of GGNR A regarding this matter. Hopefully the dog owners will not be successful in swaying you to reconsider all that you have done to come to the fair decision you have made on our(the public at large) behalf. Sincerely,

Anonymous Marin resident

Correspondence ID: 1499 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 5, 2011

Dear Mr. Dean, General Superintendent, GGNRA

This letter is in response to the proposals put forth by the GGNRA and NPS in the Draft Environment Impact Statement for the Dog Management Plan at 21 San Francisco Bay Area sites.

I thank you for taking such a long hard look at the issue of dog walking, on and off leash, at these sites. It is understood that the NPS does not generally allow dogs in its publically owned national park system. The GGNRA has been most generous to allow certain areas to be used by dog walkers for many years. I hope this proposal and attention you are giving the issue at present will be able to come up with a wonderful solution that makes the most people/dogs happy and will be both sustainable and practicle.

In that I am a tax payer, and a dog lover/owner, and that I have also been a member of the Audubon Society and Sierra Club, and in that I have observed both nature and the effects of humans on nature, I have to ask you to look closer at the conclusions you have made in your EIS. Many of your

assumptions are incorrect and many have been contradicted even within the statement itself.

I can fully understand the need to regulate and restrict off leash dog activity at such sites as Ocean Beach or Crissy field, where there are a great number of non-dog walking visitors who like to come to the site with a beach blanket, good book, picnic, small children and spend hours relaxing in peace. My focus is on the unique nature of a much more disagreeable terrain, Fort Funston.

Fort Funston is right now being used for exactly what it should be used for, a "Dog's Disneyland", a place for responsible guardians to take their dogs and let them run free for an hour or so, several times a week, and let them socialize with other dogs, to smell and romp and play and fetch and get exhausted! A tired dog is a good dog, a dog that is socialized around other dogs and people will be better behaved, this is logical, I do not need to have a doctor's study to tell me so. I have had children, and it is just the same with them, let them run outside, play in the sun, or fog or wind, and they will be better behaved and sleep better, grow stronger (even do better in school? Puppy classes?). And the beneficial effects are not limited only to the dogs, the owners, many of them seniors, also feel better for getting out there and walking and socializing with other dog owners, many of them becoming friends and being better people for the experience. Fort Funston is the one spot where this can happen without really any harm to any other entity.

We need to be realistic. I have actually read your entire 2400+ page DEIS. Within the redundancy and mistaken conclusions are some important facts regarding Fort Funston especially. Your preferred alternative will require an enormous layout of money and manpower to make it sustainable. Even then there is no proof and no logic in the assumption that the area will be able to sustain "restoration" attempts because the earth has already been so drained from the military base and from the climate out there naturally. Large fences will be needed to keep dogs in what you have designated a ROLA, then how do you envision numbers of dogs, on leash, marching down to the beach ROLA and back again, all using the small paved pathway, or are you intending to use more money and man power to enlarge that walkway? Then you will need a large amount of rangers stationed there to give out tickets to the people who will not comply, or is this how you intend to generate revenue?

Another contradiction can be found on page 1263, in the special-status species section. The only species you seem to think there is a problem with at Fort Funston is the bank swallow during nesting season. Yet, on that page your conclusions are contrary to your words. Note, " Closing the area through fencing and sign installation has been unsuccessful in preventing

recreational disturbance to the bank swallow colony, although the colony has persisted despite increased human/dog use in the area." We cannot and should not seek to create a "look-at nature" but don't touch quality to our national parks!

I also read the survey done in 2001-02, by the Northern Arizona University, in which they asked about visitation to all these cites here in the bay area. More than 56% of the respondents had either never been to Fort Funston or were not sure if they had ever been there. Not many people actually go out there, it is off the beaten path, it is usually in fog or bad weather, and other than hang-gliders, the only people to consistently go there ARE dog walkers. Why can't it remain that way? We have many, many acres of beautiful forest lands in this are that are already dog free, people use those areas now. There is no place like Fort Funston for dog lovers. Please keep it this way!

I could go on with many more issues, but I want to make this as succinct as possible. I would like to ask the Park Service to really do something great here, while you have the moment. Please have the creativity to think outside the box when it comes to Fort Funston. It is the perfect place to create an Official NPS sanctioned Designated Regulated Of Leash Area, with special provisions and signage that lets visitor know what they can expect in that area. It is not and NEVER will be an area for picnickers or leisure beach goers or children to build sand castles. The terrain is too rough and inhospitable for lovely meadow flowers, and the climate too disagreeable for long strolls at sunset. It is perfect for the rough and ready, hearty dogs and their guardians who wear layers of clothing against the fog or wind or blowing sand or hot sun or mist. They are out there all the time, everyday of the year, in all types of weather, enjoying the area for what it is, not what it was, or what we might think it should be! Please live up to your Mission Statement and provide the Adaptability and Flexibility by showing creativity in designating Fort Funston an Official Designated Of Leash Area, the first in the nation on our publically owned National Parks.

Please do the right thing. Thank you kindly,

Kathleen Klestoff, resident of San Francisco for 30 years, Fort Funston visitor only 4years with our beautiful Border Collie mix Zelda. She thanks you for your efforts and hopes you will do the right thing!

Correspondence ID: 1500 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 12:34:24
Correspondence Type: Web Form
Correspondence: As a multi-year resident of the great highway (I live in between Judah and

Sloat), I can personally say that I witness dog owners walking their dogs off leash all the time during the snowy plover protection period. There is AMPLE education about this - signs posted everywhere - and yet dog owners continue to break the law.

Just this morning I witnessed two boxers off leash in front of moraga street, running up and down the beach chasing about 100 snowy plovers across the intertidal zone. The birds would land again, and the dogs would continue to chase.

A couple of weeks ago, I watched a lady's off leash dog chase a group of plovers into the sea; and a red-tailed hawk swooped down out of nowhere and attacked a plover, breaking its neck.

I hope that existing leash laws are more strongly enforced, that education around these leash laws is stronger, and that the ENTIRE OCEAN BEACH AREA from the cliff house to fort funston be made a leashed area.

Correspondence ID: 1501 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Letter

Correspondence: My name is Mark Trautwein. For 16 years, I was responsible for all national parks legislation and policy as lead staffer on the US House of Representatives Interior/Natural resources Committee. In my tenure, we doubled the size of the parks system and tripled the wilderness system. The last legislation I managed established the Presidio Trust and completed the transfer of the Presidio to GGNRA, I say this to emphasize that I deeply respect the making of public policy and the difficult job of the NPS in refereeing fights between competing users of park lands. I devoted most of my professional life to the protection of park resources, and I'm very proud that I did. I represent no organization or interest.

Having said that, I also believe that the draft plan addressing dog management for the GGNRA is an abject failure. It makes the problem worse, not better. It resolves nothing. It is bad science and bad public policy. It is a betrayal of the best traditions of the Parks Service. This ponderous monster is built on a fundamentally false premise and represents a total failure of imagination.

That false premise is that in a place like GGNRA you can resolve differences between competing users by drawing lines on maps and imposing rules on those maps that say you can do this here but not there, you can do the other thing there but not here, except in the following cases, and you can't do any of it in this place and all of it in that place. It won't

work. It is horrifically complicated, too hard for the average park user to understand. It will encourage them to violate the rules when no one is looking and you can't possibly police this yourselves. The aggrieved parties at this site or the other will continue fighting to amend the rules and the lines -- forever -- so its a prescription for unending resentment and conflict. It is an attempt to solve by map-driven fiat what can only be solved by better behavior.

Most fundamentally, however, it violates the first principle of ecology: that everything is connected to everything else, that we must manage everything on our landscape for the system that it is. This landscape and everything on it includes people and their dogs. To chop and dice these lands into tiny bits and pieces is a 19th century management philosophy imposed on a 21st century landscape. It won't work because, by design, it can't.

Finally, the proposed program is a betrayal of the traditions of the Parks Service. It is written by a cop. The Parks Service is a lousy cop. At its best, it is a teacher, and a terrific one. Cops can't solve this problem. Only teachers can solve it. It saddens me, really, to see what's become of one of the truly unique and special institutions ever devised.

I would respectfully suggest that you rethink your entire approach here. Your problem is people. It is not dogs and it cannot be solved by your maps. Everyone must understand that we all need to respect each other for the different reasons we use these lands and behave accordingly. A truly ecologic approach would start with a premise that says people and their dogs are allowed everywhere, except places of truly critical environmental concern where neither people nor dogs are permitted. All dog owners are responsible for the behavior of their animals. That means that they are under control at all times and people are respectful of other park users and are partners in protecting park resources. The means of control are up to each owner and specific to each dog. To demonstrate that you, as a dog owner, meet these requirements every dog owner using the park is required to have a permit issued by the NPS, issued after successful completion of a program designed, constructed and operated by NPS in conjunction with relevant and responsible local organizations. That program will teach dog management and control, as well as knowledge and respect of park resources and the others who use and enjoy them.

In the end the only lasting solution to this problem in a crowded urban park is better human behavior -- more educated about people, about dogs and about the environment. Why not design a regime that addresses your real problem, human behavior, that is simple to understand and will succeed, instead of one with a proven track record of failure?

What you are doing won't make life better for people or dogs, won't make

life better for all the other users of the park, won't make life better for the ecology of that park that we all cherish and have such a profound responsibility to respect, and, frankly, won't make life better for you as park managers, either. There is a better way, rooted in the traditions of the Parks Service and the truth of what ecology means in an urban setting.

I beg you to have the courage to choose it.

Mark

Correspondence ID: 1502 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 4, 2011 To GGNRA Re: Comment on DEIS The assumption that shorebirds are disturbed by dogs is treated as fact in the DEIS. (DEIS p. 252) Yet, there is no evidence in the document to show that Ocean Beach and Fort Funston are critical habitat areas for the Western Snowy Plover. The DEIS should first prove the area in question is critical to the survival and breeding of the plover, then supply scientific evidence that there is a correlation between off-leash dogs and varying plover populations. The document should reconcile comments made by the Dept of US Fish and Wildlife (ie; "Western Snowy Plover will never nest and /or breed on Ocean Beach because there is not ample, suitable habitat.") and by the 1996 Hatch Report ("Factors other than the number of people or dogs, possible beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach.") to GGNRA's new stance that off leash dogs pose a threat to endangered species.

The DEIS fails to document the lack of restrictions on people in the Snowy Plover habitat by GGNRA. The report fails to describe the impact of sporting events on Ocean Beach and Crissy Field, like the 2006 Turkey Trot (1,500 people ran/walked on Ocean Beach through Snowy Plover protected areas with no restrictions in place), and like Fleet Week where on Crissy field hundreds of people gather to watch the show with no protection in place for the plover's protected area. The document fails to describe the extent of the impact of GGNRA's own insensitivity to the Western Snowy Plover protected areas. GGNRA routinely drives vehicles up and down Ocean Beach. What guidelines exist that provide protection from these vehicles, including the noise they create? Lastly, the DEIS should explain the rationale behind the 2007 plowing of the Western Snowy Plover habitat at Ocean Beach by GGNRA. Photos 1-4 (attached) record this destruction in film. The DEIS should quantify the impact of all these behaviors in comparison to the impact of off- leash dogs. This comparison should be

supported by facts, not anecdotes.

To single out off-leash recreation with the severe restrictions of the Preferred Alternative for Fort Funston is blatantly unfair. The current off leash policy should remain in place.

cc: Nancy Pelosi, Congress Ken Salazar, Dept of the Interior Scott Wiener, San Francisco Supervisor

Correspondence ID: 1503 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 4, 2011 To the GGNRA: Re: Comment on DEIS I am a 64 year old retired high school English teacher, a resident and native of San Francisco. I strongly oppose the restrictions on off-leash dog walking recommended in the Preferred Alternative for Fort Funston.

The DEIS report fails to provide any hard data that dogs "degrade" the land. (DEIS, p. xii, p.225) The document fails to consider the extent of human recreational influences on the soil, and to what degree human non-dog activities and occurrences of nature "degrade" the soil. On any day a visitor to Fort Funston would see hikers, bikers, skaters, joggers, Families frolicking on the dunes, horse-back riders, surfers, and hang gliders. The document does not, and it should, quantify dog-users vs. other humans' activities' contribution to impact on the soil. Nor does it quantify the extent wind, rain, ravens, raccoons, seismic activity, and burrowing animals play upon the "degradation" of soil.

The document fails to provide any evidence the impact of off-leash dogs is any greater than any other probable source named above. The restriction of off leash recreation to approximately 3 acres is disproportionately severe, considering the lack of evidence and that other stewardship measures could be taken to preserve the land.

One such measure could be to improve the fencing around sensitive areas. Photos 1 - 2 attached show a cord strung between two posts acting as a boundary to fragile dunes and the Western Snowy Plover foraging area at Fort Funston, Anybody could step over this cord. Photos 3 - 4 show the long stretch of inadequate fencing , people climbing on the dunes, and a sign that says nothing. Photos 7 - 9 show contrasting stewardship practices at Pt. Isabel Dog Park in the East Bay Regional Park District. Fences are high and sturdy; signs are clear, frequent, and educational.

I recommend the current off leash dog walking policy remain in place. In

addition, the GGNRA should turn its energy to improved stewardship of this recreational area, not to turn it into a wilderness, but to provide guidance to citizens, clearly and often, how to enjoy the park to the benefit of all

cc Nancy Pelosi, Congress Ken Salazar, Dept of the Interior

Correspondence ID: 1504 **Project:** 11759 **Document:** 38106

Received: Mar,03,2011 00:00:00

Correspondence Type: Letter

Correspondence: March 2, 2011

Frank Dean, General Superintendent, Golden Gate National Recreation Area. Building 201. Fort Mason. San Francisco, CA 94123-0022

Dear Superintendent Dean:

I am writing in support of the GGNRA Dog Management Plan - Preferred Alternative.

I have lived near the Presido for over 35 years and frequently walk there for exercise, bird watching and enjoyment.

It is essential that a clear policy be implemented for dog management, Although I am a life- long dog lover, I have observed many abuses in the Park:

Observations ? Many professional dog walkers with 8 -12 dogs running around off leash. ? Dog feces on and beside the trails and in areas recently planted with native plants. ? Blue plastic bags filled with feces left on trails and signposts ? Off leash dogs that have pounced on me with muddy paws while their walkers proclaim "oh, don't worry, they are friendly" ? Friends who have been bitten by off leash dogs in the Presidio. ? Dogs running and damaging areas newly planted with native plants.

It is essential to establish and enforce a clear policy to protect native habitat and the enjoyment of all who frequent the Park,

Suggestions 1) Professional dog walkers should be licensed and pay a use fee as other vendors do 2) There should be a limit on the number of such licenses based on the "carrying capacity" 3) Professional dog walkers should be limited to a maximum of 4 dogs and all on leash. One person cannot manage properly more than 4 dogs at a time.. 4) Professional dog walkers who do not respect the policy should not be allowed to use the parks. 5) Post signs so that users cannot claim they do not know the regulations. 6)

Authorize and encourage all staff to enforce the policy 7) Consider authorizing park volunteers from existing programs to help in policy enforcement. 8) Consider establishing a fenced "dog run area" where dogs could run free. (perhaps also a use schedule for professional dog walkers). 9) Promote better understanding of the need for a Dog Management Plan and the restoration activities through signs and fliers distributed in the park and nearby neighborhoods.

Hopefully, implementation of a clear policy will eliminate the many abuses that have occurred and make the park pleasant and safe for all users as well as for the native habitat.

Sincerely, Jean G. Colvin SF 94115

Correspondence ID: 1505 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 12:53:25

Correspondence Type: Web Form

Type:

Correspondence: I am for Alternative A, to keep the off leash laws as is, as per the Draft Dog Management Plan / Environmental Impact Statement. We created these animals who do so many things for our benefit: helping the disabled, protecting our houses and property, bomb and drug detection, finding missing persons and catastrophe victims, hunting, tracking criminals and other police work, entertainment. Above all is the love and companionship the 'family dog' provides to every family member. Medical studies repeatedly show having a dog eases the stresses and anxieties of modern day life. We take our dog out as often as we can, but we both work full time and we are concerned that our golden retrieve get dilay exercise to stay healthy and happy. So we use a dog walker twice a week who takes our golden retriever to Fort Funston and various other GGNRAs for off leash exercise. Currently, off leash areas for dogs are severely limited. I am against making leash laws more restrictive in any way. Don't our dogs deserve places to run free and get exercise to stay healthy? Don't we owe this to these breeds we created? Finally, I no longer use "dog parks". They are too small, often too crowded and do not provide necessary, varied stimuli for my dog.

Thank you.

Correspondence ID: 1506 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Frank Dean, Superintendent Golden Gate National Recreation Area Building 201, Fort Mason, San Francisco 94123-0022

RE: Proposed "Off-Leash" Ban - GGNRA

Dear Superintendent Dean:

First. I OPPOSE the proposed further restrictions on dog use of the GGNRA. Indeed, in my opinion, MORE area(s) should be set aside FOR dog use, NOT fewer!

Second. To the extent my brilliant "thinking"/"logic" might be considered.

A. How about JUST enforcing existing laws?

1. Yes, I suspect that, over the years, dogs have been a problem for people, the habitat and wildlife in GGNRA and that there have been (to quote the Independent Journal) "aggressive dogs attacking people and smaller animals scaring children and trampling on sensitive wildlife habitat"

2. However, I am certain that all of the dog problems have involved acts which are a-l-r-e-a-d-y illegal.

For example, I am certain that there are laws/rules against littering, destroying government property, etc.

3 I urge you to consider the fact that all that is actually necessary with respect to the alleged problems with dogs off-leash (or on-leash) is more enforcement of existing laws/regulations, not the implementation of new laws/regulations.

Yes, the new laws would be easier to enforce! For example, all a ranger would have to do to enforce an "on-leash" law, is arrest/cite little old men/ladies who let their dogs out to pee. That's a much easier task than actually responding to, seeking out and citing/arresting a dog destroying property or a dog that is truly out of control.

Indeed, I, personally, perhaps "over a beer or two," would love to prove the following proposition. That is almost certainly, the first person cited/arrested for violating the plan's new "on-leash"/"off-leash" law will be some 75 year old ex-nun with a 25 lb Tibetan terrier. The first person cited/arrested for violating the plan's new "on-leash"/"off-leash" law will not be some derelict with an out of control pit-bull. We both know this will be true because: (a) it will be too dangerous for a Ranger to confront the derelict with an out of control pit-bull; and (b) the derelict has rights (as a disabled person) the ex-nun doesn't have (and, moreover, will have, probably, got the pit-bull certified as a "therapy-dog"). Curiously (and I cannot resist saying so), I suspect that, people (defecating on trails,

assaulting each other, stealing from each other, littering, cutting switch backs, cutting down fire-wood, leaving kids diapers all over, scaring birds, surprising deer, whatever, etc.) have been a much greater problem in GGNRA. Indeed, my dog is, I guarantee, better behaved than 90% of the human visitors to the GGNRA!!!! Perhaps, the solution is further banning people, not dogs?

B. Beware of being manipulated/driven by "today's squeaky wheel."

1. No offense intended, again, but this whole drill appears (from the newspaper accounts) to be a response to complaints about dogs. This approach to GGNRA rule making suggests that you can be easily manipulated by those who have the most time or money to bitch and complain. Such a reactive (versus pro-active) approach is not the same as insuring public use of National Parks.

That is, I suspect for a lot of the dog owning public, the proposed rules appear to, merely, be a response to today's squeaky wheels." [See "C," below, for a better pro-active approach.]

2. It also appears that rather than recognize that there are also a number of "members of the public" who have dogs, and who like to walk with their dogs (off-leash) and attempt to accommodate everyone, you are going to (as they say) "throw out the bath with the bath water."

That is, the whole GGNRA now appears to be for the sole benefit of those who don't own dogs (and who bitch the most). [See "C," below for a better approach to this problem.]

The proposed plan would be much more "rational" (versus "reactive") IF additional "open space" (at a greater, perhaps, distance away from tour bus, and family, weekender areas) was opened up to dogs under control (see, for example BCDC open space "dogs under voice control" rules), or actually reserved for off-leash dog use. [See "C," below.]

C. WHY NOT, in fact, actually, ACCOMADATE everyone? THAT IS, dog owners are part of the "public" too!!!

1. A model accommodation for the dog owning public is Point Isabel in Richmond, California (East Bay Regional Park District). Pt. Isabel is an example of the use of some Bay Area "sacred shoreline" just for dogs (off-leash, mostly). To the extent you have not visited Pt. Isabel. I invite you to do so.

2. Why doesn't the current GGNRA "dog use" Plan" include some area(s) like Pt. Isabel? East Bay Regional Park folk probably have to deal with lots

fewer "off-leash" dog complaints at the other parks BECAUSE of the existence of Pt. Isabel. And, "the public," there has, even, organized a care-taking crew (FIDO) and there is even a coffee stand.

3. Really, you all could appear to be so brilliant and so "pro-active," (versus "re-active") with some "dogs only" areas in the plan.

Very truly yours,

David W. Walters

Correspondence ID: 1507 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

March 3, 2011

To whom it may concern,

I am a (soon-to-be senior) resident of Sausalito, Ca who goes to Rodeo Beach with my two dogs at least once a week during the winter and more often during the non-rainy season. I thoroughly enjoy time spent with my dogs at Rodeo Beach and, please note: I always clean up after my dogs, and have them under voice command at all times.

Please do not change the current policy at Rodeo Beach or in other areas governed by the GGNRA, for that matter. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the Bay Area.

I believe that there is no factual basis for the argument that birds and other wild animals need to be protected from off-leash dogs. There seems to be no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife. Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impact.

It is my understanding that severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the

total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. Target enforcement on the small number of people whose dogs misbehave, not on excluding the entire class of people with dogs from most of the GGNRA. Jean Donaldson, nationally recognized expert on dog behavior testified before the SF Animal Control and Welfare Commission on 2/8/07: "Self-selection operates strongly, i.e., people who take the time to get into their car or walk to a designated off-leash area to exercise their dogs tend not to be the type who are derelict in other areas of dog guardianship, such as training, socialization, or appropriate containment."

The Preferred Alternative severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA (NOT a national park!!) is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as

traditionally occurring in the land was to become the GGNRA.

In addition, the Preferred Alternative discourages cooperation between different park users and will increase conflict between park users, as more and more people are crammed into smaller and smaller spaces. Park user groups can work together to resolve problems when they come up.

Please note that a new plan needs to be developed that will be more balanced, supportive of recreation, and reflects San Francisco Bay Area's values of co-existence, shared use, collaboration, and education to solve problems.

Thank you for your attention.

Nancy Moyle

Sausalito, CA 94965

Correspondence ID: 1508 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

March 3, 2011

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Thank you for your attention.

Nancy Moyle

Sausalito, CA 94965

Correspondence ID: 1509 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: February 21, 2011

To Whom It May Concern:

I am a dog owner and a San Francisco resident. For many years I have enjoyed taking my dog to Fort Funston where my dog could enjoy running free retrieving pine cones and getting the exercise she needs. My dog is well trained and completely compliant with voice commands. Because I am a responsible citizen, I always clean up after my dog whether on or off leash. In all the years that I have taken my dog to Fort Funston, I have not witnessed a single instance of a dog biting anyone. I have seen dogs playing and nipping at each other, but never have I seen a dog break another dog's skin or fight viciously. It is my observation that dogs off leash are less aggressive than dogs on leash. It may be related to their natural territorial instinct. As we walk along the trails at Fort Funston, I toss a pine cone and my dog runs and retrieves it and brings it back for another toss. I can't tell you how wonderful the ride home is with my dog panting loudly after getting her proper exercise.

For these reasons and many more, I would like to comment on the proposed

"Preferred Alternative" and ask you to reconsider and choose Alternative A.

In your EIS, under issues, you use terms such as:

Dogs may affect Dog use can damage resources Dog management policy may impact or influence

Yet for more than 30 years, dogs have been leash-less at Fort Funston and therefore there should be sufficient evidence of exactly what dogs actually do to the environment.

You even cite the possible sonic effects that dogs barking could have on bird-watchers or someone enjoying the sound of the surf or the croaking of frogs. If this were an important consideration, perhaps we should not allow people to speak except in a whisper.

You point out the percentage of minority groups such as Blacks or Asians that don't go to Fort Funston because they are frightened of dogs. I think that people who are afraid of dogs off leash are just as afraid of dogs on-leash. I observe that there are many Blacks and Asians enjoying Fort Funston and their enjoyment is enhanced because of the many dogs they see. I don't think that how we enjoy our parks should be limited by phobias that some people have.

You talk about the effect dogs may have on wildlife such as the Plover. If the Plovers are negatively affected by the presence of dogs, these effects should be scientifically demonstrated in your study since off-leash dogs have been in Fort Funston for more than 30 years.

The study is full of terms such as may affect, can damage, and may impact. What's missing is have affected, have damaged and have impacted.

The same arguments can be made if one wanted to ban human use of these parklands because people may affect the wildlife, can damage resources, and may impact or influence all the things that concern you about dogs. Finally the reports states that some people don't clean up or their dogs. This is true but is not the norm. You even stated that responsible dog owners have organized to clean up after irresponsible people. Since the vast majority of dog owners take their responsibilities seriously they should not be punished because of the few. It would cost the Park Service less to police and fine those few irresponsible owners rather that police the responsible owners that want to run their dogs. I should point out that a dog on leash still needs to go to the bathroom and Irresponsible people will still not clean up after their dogs.

I hope you will consider my comments and rethink your Preferred

Alternative.

David M. Hurowitz San Francisco, CA 94116

Correspondence ID: 1510 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Comments for the GGNRA:

I oppose your Preferred Alternative and believe that the status quo should be retained for the following reasons:

-You have not considered the impacts on city parks if people get kicked out of the GGNRA. According to the data in your 2002 Public Opinion Research Telephone Survey regarding GGNRA Pet Management Issues, there were 863,000 visits to Fort Funston, Crissy Field, and Ocean Beach per year. 20% of these people reported owning dogs, and dog owners are very frequent (5 or more times per year) visitors. This adds up to a very large number of people with dogs that need to go somewhere to walk them.

-Your own data do not support your claim that off leash dogs represent a safety concern and are a threat to non-dog people. From 2001-2006, the latest years for which data is available, there were only a total of 2,865 pet-related incidents recorded by the GGNRA; this is out of 226 MILLION dog visits during the same period. Clearly either dogs are not a problem or you are unable to enforce existing laws. In fact, dog-related incidents represent only about 3% of the incidents involving people.

-The clause which states that if compliance is not at 75%, then the area can become more restrictive without any notice or public comment is unacceptable. It only goes one way -- to more restrictive. It does not say, for example, that an on-leash area can revert to off-leash should compliance be at 100%. Also you do not state how you plan to monitor compliance, and that needs to be a part of the plan open to public comment.

-You suggest that dogs damage the environment, and that can be true. However, you should consider that much of the current off-leash areas at Fort Funston and Crissy Field are paved. It really doesn't help the environment much to restrict dogs in those areas. In fact, if dogs are all concentrated into small areas the damage will be greater than if the dogs are allowed to spread out. Fort Funston and Ocean Beach are not pristine areas anyway. Fort Funston is home to old military constructions and both Ocean Beach and Fort Funston have giant sewage pipes that take out treated

sewage out to sea.

-The Snowy Plover is not an excuse to ban dogs from Ocean Beach or Crissy Field. Plovers are threatened but they do not nest on Bay Area beaches. There is no conclusive evidence that dogs disturb Plovers. The 1996 and 2006 Hatch Reports showed that the numbers of Plovers went up during the periods when dogs were allowed off-leash. It concluded that, "Factors other than the number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers at Ocean Beach." The 1996 Hatch Report also showed that only 6% of dogs chased birds and of those most were seagulls. 1/3 of 1% of dogs were found to chase Plovers. The 2009/2010 Golden Gate Audubon Society Report showed that about 1.5% of dogs chased plovers. Warren 2007 found that recreational disturbances did not change the feeding or behavior patterns of birds. Forrest and Cassidy St. Clair 2006 found that whether a site was on or off leash had "no measurable effect on the diversity or abundance of birds and small mammals.

-When the GGNRA took title of the beaches from the city of San Francisco in 1975, it promised to maintain the recreational use of the lands. However, this Dog Management Plan is just one more step in a strategy to manage the lands as a wilderness area or a national park rather than as a recreational area. This is not appropriate and is unfair to the citizens of the Bay Area.

-The Plan is full of impacts of dogs that "could" occur or "might" occur but there is little evidence that they actually do occur. Enforcement of this plan will cost money. With our current budget crisis, it is not appropriate to consider spending taxpayer dollars to fix a non or "possible" problem.

Correspondence ID: 1511 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 2, 2011

I have for the past 11 years lived on the edge (WUI) of the GGNRA National Park at the trailhead of the Miwok Trail. I walk with my dog JAX both on the Headlands on a daily basis and on weekends at Muir beach. In my many years of enjoying life in Marin with dogs and hiking with them on NPS trails, my encounters both with dog owners and with dog walkers, has been incredibly positive and in all those years I have only had one negative experience. Most dogs on NPS land and beachers are very happy dogs indeed -well exercised and therefore mellow and playful. Relating with them is part of the wonder of living so near to the GGNRA and NPS lands and beaches. I have never seen a dog hunting or destroying any of the public

lands in anyway in all the years I have lived here and walked these trails.

I feel strongly that singling out of dogs as the perpetrators of soil erosion and damage on NPS land is patently absurd. They no more erode the land and arguably do less damage than the myriad of daily sights of regular hikers, casual walkers, and the 20 odd mountain bicyclists storming down the paths every weekend and holiday, the equestrians of the Miwok Stable, the runners of the meets held multiple times a year on NPS land, the families that pollute the beaches and leave trash in their wake, the fishermen that line up their rods on the rocks and the NPS contractors who have plowed up great furrows of earth, disturbed wildlife, destroyed dens and native plants and rearranged water courses in a vain attempt to right the wrongs of bad policy management made years ago and that is similarly continue to be made today - and at what cost the the public coffers?

The absurdity of the current proposal to fund personnel to ticket dog owners to the tune of more than \$1,500,000 a yera is - in these times of recession cutbacks, threatened closures of parks and general neglect of existing parklands - an insult to tax payers and supporters of the NPS alike. Is this part of the management plan - a simple revenue stream?

It is an ongoing battle to get some kind of sanity regarding the unfettered walking of our dogs. What is the point of all the training we do with our dogs to get them to be good citizens in their world if they and we are only to be rewarded for our efforts by being forced to walk them - unnaturally - on leash? Dogs must run and play and socialize and smell the earth and be allowed to be dogs. Dogs on continuous leasn and not exercised enough are neurotic and very sad indeed...

Further, the proposed policy to restrict dogs only to certain areas will by definition force dog owners to congregate in very small areas which may in of itself cause problems and will create a false self-fulfilling prophecy currently engineered by the NPS that there are vast problems with dogs that require such draconian measures.

I urge the NPS to reconsider their plan and I request that the current rules relating to dogs - those of limited areas of leash control but mostly dogs under voice control - be upheld and left unchanged.

Thnak you for your attention,

Betsy de Fries + Jax

Correspondence ID: 1512 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00

Correspondence Letter

Type:

Correspondence: My Comments and questions on the GGNRA DEIS Dog Plan

I am a San Francisco Resident that has, since moving to San Francisco enjoyed a number of the GGNRA areas under consideration ' in Particular Rodeo Beach in Marin, Lands End, Baker Beach, Crissy Field, Ocean Beach and Fort Funston in San Francisco.

I am very much opposed to the changes proposed for both generic and specific reasons which I will try to address.

-I have a very active dog, a Border Collie rescue Mix, and being active it requires DAILY running. This running is done by myself and/or our Dog Walker. She is insured and Bonded and, and I am sure of her professionalism ' but more about dog walkers later. Everyone who knows dogs knows that a tired dog is a relaxed dog, and a relaxed dog is well behaved. Off Leash exercise is so much more than on leash exercise. On leash exercise limits the dog to my level of fitness, and that means that by forcing on leash requirements you are binding the exercise of many dogs to that of handicapped, and elderly owners. My dog "forces me" to go out every day and take a walk, and although that can be in my local neighborhood it is nothing like our walks in the Marin Headlands, or Lands End paths, or along Crissy Field. These moments when my dog runs back and forth with a stick in his mouth are the reason I get in my car and go the GGNRA controlled lands. Your preferred plan, as far as I can see eliminates ALL off leash circular trails. If there are any left please let me know

-The concept of Compliance Based ROLA is astonishing. As far as I can understand The NPS self appoints itself to monitor a compliance level of 75% based on total dogs observed not in compliance . Who does the observing? A third party? When do the observing? Of course, for it to be legal I presume it will be done for 365 days every day from 5 am to 10pm when the parks close, because, if there is no one there to observe and 100 dogs use the park, and are in compliance they will not be tallied, which means your data is invalid. As you can see ROLA is non-sensical in the way you define it, it the way you set it up to self police, but even more so in the way you ascribe to yourself the powers to make reductive changes to the use of the park without proper due process. The Poison pill has to be eliminated from the plan as it probably is illegal and will successfully be challenged in Court.

-Answer a question ' is dog ownership in San Mateo/San Francisco County/Marin increasing or decreasing? All the studies I have seen it is increasing. Therefore, as caretakers for lands given your trust for recreational purposes by those counties should you not take that in

consideration and offer an alternative where you INCREASE off leash areas? Off leash areas, at the time of the 1979 Pet Policy was limited to only 1% of all the lands you administer. Since then new land has been added but you have DECREASED the percentage of those lands to below 1%. Why is there no alternative where you reflect demographics and the desires of the citizens of those counties who gave you the land and offer another alternative where you increase these lands? -Your Preferred alternative states that all new land donated will not be for off leash purposes. This is draconian and simply unfair. Your purposes, for the GGNRA is for RECREATIONAL purposes. These lands are NOT National Parks ' they are ex army installations and they were given in trust for you to administer in keeping with the original deed.

-Why is the current system not working for you? Are you able to enforce the current No 'off leash zones? They are 99% of the lands you administer. If you can do it now why the need to change? If you cannot do it now, what additional funding will you require to ensure the new areas will be enforced?

-Snowy Plovers: Your own research (Forrest Cassidy St Clair and Warren all demonstrate that dogs do not actually impact the diversity, abundance and feeding behavior of the birds. The Hatch report observed 5692 dogs and only 19 chased plovers. Your own studies prove that parents with toddlers, surfers and other park users disturbed the plovers far more than dogs, yet I do not see anything in the DEIS that is further restricting their access. Why are dogs being singled out? Your environmental impacts are a whole bunch of "could occur" "may occur" but I do not see a single study that backs this up You mention Bank swallows, and their nests, but they burrow in the cliffs, areas that dogs simply do not go to.. Ultimately your environmental studies do not seem to support your conclusions and you can be taken to task on this.

- You TOTALLY ignore the impacts that these policies will have on the surrounding areas. If you squeeze dogs out of GGNRA lands where will they go? To overloaded City Parks (mmm, I think the City of San Francisco may have something to say about that..... You deny all off leash privileges to San Mateo County. That, per se is astonishing. Remember, and I know I am repeating myself. The GGNRA is NOT a national park or preserve.

IMy feeling is that you have been conducting a misguided battle to solve a issue that is simply not an issue. Your data simply does not support the existence of the problem, and your attempts to squeeze a NPS agenda on local parks is misguided and contrary to the spirit with which these lands were given to you.

I do not want to see a change to the status quo.

Alex Norton San Francisco

Correspondence ID: 1513 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 13:42:25

Correspondence Type: Web Form

Correspondence: First, let me say that I am appalled that time, energy and resources have been spent by NPS staff to create a 2400 page document on this issue. I think it is unwarranted, and a complete misuse of public funds. Of course, that was only the beginning, subsequent public hearings and more deliberations will only run the final bill much higher.

And for what?

The Golden Gate National Recreation Area was established to be, and has become, an amazing resource for public recreation and enjoyment. NOTE: this was NOT established as the GG National Reserve or Environmental Preserve. For years, National Park rangers issued tickets (my wife received one for \$75) that were later judged ILLEGAL because the restrictions being enforced/imposed were NOT part of the original environmental impact statement (EIS).

Now, years later, and after years of "negotiated agreements," countless staff hours and much much more, your new "dog management proposal" has been released for public comment. In truth, I suspect that you've already decided and plan to enact the plans mapped out in the document, and this entire commenting exercise is ONLY to fulfill the legal requirement before enacting new ADMINISTRATIVE regulations.

I want to believe this is not the case. I want to believe that the public hue and cry will convince you to leave things as they are.

I truly want to believe that the original vision of the Burton Brothers, so fully enjoyed and realized by all the visitors and their dogs--not just kids--will continue to be the GGNRA reality.

And my fervent hope is that you will put this matter to rest, reassign the staff to more productive projects and leave two- and four-legged visitors to enjoy the GGNRA in exactly the way it was intended it should be!

There is NO need to impose the leash regulations on everyone because of the few situations cited. Let this unique, amazing and wonderful RECREATIONAL resource remain as it has been.

Correspondence ID: 1514 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I found it frustrating that the Dog Management Plan online at the nps.gov website is in a copy-protected format so that I cannot copy + paste text, either to include it in the comment I am preparing, or past it into my notes, or email to others who are interested in this issue.

Can the PDF files be modified to allow us to copy + paste portions of text?
Would appreciate it if so.

Correspondence ID: 1515 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: 1) In San Francisco county parks people and dogs interact fine. By limiting dog areas dogs and people will be more crowded causing tension and behavior problems which would impact the visitor experience. In order for dogs and people to get along there needs to be more space for dogs then the Pref. Alt.

2) I have never witnessed any harmful encounters between dogs and wildlife, or plant life and instead of restricting space for dogs should issue fines for incidents allowing visitor/people to report. Having such fines would motivate people/dogowners to respect the habitat. The responsible owner could still enjoy the unrestricted space.

3) In the pref alt for Fort Funston I cannot take my on my dog walk for she has a Back disability and would require paved access for both her and the dog. She needs the dog to be off leash for her back condition and cannot handle a dog pulling on the leash. The off leash areas are sand or would require going down a very steep beach access trail which would put great stress to her injury. As the pref. Alternative would restrict my mom from being able to come to For Funston on our dog walks, she will be left out of a very important part of her life. I would like to keep my mom a part of the walk and restricting her I feel is discriminating.

Correspondence ID: 1516 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am a dog walker who frequents Fort Funston. I pick up twice as much poop as dogs I walk almost every time I am there as well as plastic bags & other trash from people.

Dogs are my life & I do not want them to lose the freedom of being off leash at the beach. However, as a 54 year old woman I can not physically handle taking 6 dogs down to the beach via on leash walking. They are anxious to run & I tho very healthy I can't handle their pulling & excitedness. I do have them trained to come via voice control & this should be sufficient for them & me. Well behaved dogs & responsible owners/dog walkers will be punished by these plans. I think the best alternative is to NOT change the usage areas, rather to enforce the rules regarding picking up poop & managing dog behavior.

Correspondence ID: 1517 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: We should not confuse a National Park with a Recreational Area. A Recreational Area is a place to have fun. This includes playing on the beach with my dog. GGNRA is a Recreational site in a metropolitan area of some 7 million people. In San Francisco there are a massive number of single house-holds with dogs. Confiscating recreational rights on dog owners is no solution. Face it, the dogs don't care its the owners who feel their rights are violated. As both a parent and a dog owner I can testify that when my son was young he and his friends spent more time running through dunes, hooting and hollering, and havign sword fights (in what we now know as snowy plover habitat) than my dog ever does when she is off leash. Yet there is no child management plan.

On beach clean up days - I have never found dog feces, its all human detritus that fills the dumpsters.

The real solution is to fence off sensitive beach areas with snow fence and free the people, their childre and their dogs have a great recreational experience. Taking away dog owner rights only under mines respect for important ecological programs.

Correspondence ID: 1518 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Thank you for at least letting me review your report. But I must say that it is over blown and to restrictive to peoplpe who have lived - a life time in this

area. I am a native and have enjoyed this area since childhood. The native species have not been affected since that time. The only adverse affect has been our failure to stop the onslaut of humans coming in. I have exercised my dogs off leach in all these areas, and will continue.

I love Sharp Park Gold Course and have let my dog swim in the lagune for many years and have not seen any reduction in the number of frogs or snakes. But an increase of wild cats, ravens, mud hens, egrets, herons. If these wacko evironmental want to save this, they got on the band wagon a little too late - it's ok! No body objects to restricting during breeding season but not at all times. I have walked off leach in the hills, beaches, and have only been welcomed by others enjoying the same.

Correspondence ID: 1519 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Thank you to all the volunteers and staff for putting together the 3/2/2011 meeting at Tamalpais H.S.

The true issues with dog behavior begin and end with dog owners.

One suggestion to help would be to enforce stricter laws with respect to dog licensing in the city of San Francisco. This would allow there to be accountability for the dogs' actions and trace information back to the owner.

For example, if public awareness regarding licensing was achieved and dog owners and the public alike know there are consequences for dog behavior, enforcement at the GGNRA (and other local laws) could potentially be reinforced.

Correspondence ID: 1520 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Email: Angela@gentletouchdog.com

Angela DiMeglio, dog trainer + educator

I see no reason for increased restrictions. I would like to offer + suggest educational programs for dog guardians + other users. I would be happy to help with this + will + would encourage my clients, students + friends to do likewise.

Proactive methods (e.g. education) are preferable to reactive (e.g. closures) methods.

Thank you,

Angela DiMeglio

Correspondence ID: 1521 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Ocean Beach

Plan E is the only reasonable compromise. Then enforce it -- and fine people who break the law.

However, it seems to me that the current plan is restrictive enough + requires no additional restrictions.

Correspondence ID: 1522 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence:

1) Fort Funston beach should be no dogs. The shore birds have a difficult enough time and even dogs on-leash disturb them by barking and lunging at them.

2) Commercial dog walkers should not be allowed. The Park purposes do not include those activities.

3) ROLA's ought to be fenced. That at least precludes dogs extending a ROLA unintentionally.

4) Compliance for areas where dogs are allowed should be 95%. At 75% compliance, a significant amount of damage still can be done. Monitoring must be given priority, as well as clear signage.

5) A limit of 3 dogs per person ought to be maintained. More than that is difficult/impossible to control, especially in areas with other people or wildlife.

6) Baker Beach at Lobos Creek must be restricted, no dogs. It is a sensitive area and within 100 ft of it should be set off in some way.

Correspondence ID: 1523 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Dogs are not the problem, people damage the environment more (out of 16 injured snowy plovers nest- only 1 was disturbed by a dog.)

Enforce current dog litter pickup + behavior control regulations - instead of restricting dog more.

Dogs restricted to small spaces will hurt the environment more than if they have a larger area. City parks can not handle the impact of 1000's of additional dogs that would result if people can use the GGNRA.

Correspondence ID: 1524 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I understand the need to protect the land and the environment and I too want this, however, cutting out more places for dogs to run free (off leash) is getting smaller and smaller. San Francisco is a dog friendly city and I believe there are more dogs than kids; however, we have more parks for kids + less for our four legged kids.

I was born in San Francisco, I love this city and I too love my dog. I hope we can find a way to fix the real issue + educate the public about how we can share the area and give tickets who don't.

Correspondence ID: 1525 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Upon reading the proposed plan I understand the concerns of the environment and the impact the dogs have on the land, as well as the general public. The reality of the situation, however, is that in Marin County there are more dogs per capita than any location in the U.S. That being said I am an avid hiker, and always have my dogs with me on the trails. Being an avid hiker on dog-friendly trails only (of which I am incredibly grateful for) approximately 90% of the other hikers I run into have dogs with them. There is plenty of open space in Marin County that hikers.bikers can use where dogs are not allowed and dogs have to be on leash.

Also, I own 3 dogs in Marin County, and often take care of a friend's dog as

a favor, although I appear to be a professional dog walker I simply have 3-4 dogs with me on a regular basis. Please don't take our dog friendly trails away from us. I donate to the GGNRA regularly and truly believe it is an incredible organization being an avid hiker and backpacker. If the dog friendly trails are taken away dogs will be consolidated to smaller spaces which will create more problems in the long run. When & if you are to impose the laws please allow 6 dogs (w/permit) off leash in proposed areas. Thank you!

Correspondence ID: 1526 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I understand the need to preserve our wildlife areas, but at the expense of their utility to dog owners seems to be counterproductive. The SF & Marin County areas already have very restrictive limitations on where a dog can be off-leash. It's becoming harder & harder to go on walks in public rural areas where your dog can be off-leash. I recognize that dogs can't run free everywhere, but they should have the right to run free outside in appropriate places.

Correspondence ID: 1527 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Many folks want to walk dogs in GGNRA. They pay the county to license their dogs. There is a reasonable expectation, especially in this financial climate, that a fee be paid to support their use of the resource.

Such a permit fee could be assessed per dog, with a higher fee for off-leash use or more than one or two dogs per person. Fees would help defray the costs of enforcing the regulations and maintaining the resource. NPS wouldn't quite see dog permit fees as a profit center, but they would certainly help.

The user community should be polled on suggested fee levels- it's probably best to present ranges of amounts, and an expense breakdown to justify them. Once users/visitors see where the expenses come from, they would be more ready to help arrive at a fee that represented a balance between a perceived unfair burden and a support of the resource.

Correspondence ID: 1528 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 14:50:13

Correspondence Type: Web Form

Correspondence: Please do not pass this plan! The original Burton Brothers agreement was and is a very workable solution to the control of our dogs while using the GGNRA. This plan is restrictive and short circuits our rights as citizens of this great state and nation. For once listen to the real users of the park lands and leave the park usage requirements as is. Thanking You in advance.

Sincerely Daniel Lee Bushnell, PE retired

Correspondence ID: 1529 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: The draft environmental impact study draws conclusions from little or contradictory information. For example, one study of the impact of dogs off leash in urban parks show no decrease in bird diversity, but the EIS concludes a negative impact.

Contrary to the gold standard of Adaptive Resource Management, the plan only proposes to collect data on dog compliance, ignoring the issues that are the goals of the plan such as the environmental impact of the changes. The plan only allows that "off leash areas" will be more restricted in teh event of non-compliance, not balanced since the less restricted option is not available in the event that it was determined that adding restrictions did not benefit environmental or safety issues.

Small business issues are dismissed by the report citing the low proportion of regional GDP, but any small business group will be a small proportion. Alternatives allowing for fees to support current use are ignored.

Having two off-leash areas connected by an on-leash areas as in Ft. Funston seemed designed to insure non-compliance.

Correspondence ID: 1530 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Email: Angela@gentletouchdog.com

Angela DiMeglio, Gentle Touch Puppy & Dog Training

I would like to offer my assistance in facilitating educational programs for dog guardians + other users. I see no reason to change the rules. That is, no

need for increased restrictions. We can look at such things as permits, limits to # of dogs per per, etc. We need to move in a proactive, educational manner, not a reactive one.

Thank you, Angela DiMeglio

Correspondence ID: 1531 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I attended the event on March 2nd at Tamalpais H.S. It was very informative. Unfortunately much of the information was confusingly presented.

The maps in the black books were the easiest to understand, but members of the staff were not familiar with them.

I am particulrally in favor of maintaining and increasing areas available for dogs off-leash. Every alternative either maintained or reduced both on-leash and off-leash areas. The preferred alternatives presented all seemed to be the most restrictive alternatives.

At Stinson Beach Alternative A allows only for dogs on-leash in the parking areas. This is the best alternative presented, but there should be another alternative that allows dogs off leash on part of the beach.

At Muir beach Alternative A, current conditions, is my preferred alternative. Alternative E restricting dogs only to south of the path but calling it "most access" was very misleading.

At the other areas: Homestead, Oakwood, Alta, and Rodeo, maintaining current access - Alternative A is what I would prefer of the Alternatives presented. Even better would be more access.

The Park Service has not presented a compelling case for imposing new restrictions.

Correspondence ID: 1532 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I think a big part of the problem is the number of dogs walked by dog walkers at one time. I believe there should be certain areas for private dog walkers only + limiting numbers of dogs walked by dog walkers.

Who will enforce the laws? Will there be consequences for dog walkers who walk 6-10 dogs at a time. I believe it is a huge problem.

Correspondence ID: 1533 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Please, please, please don't close Chrissy Field (San Francisco) to off-leash.

Proposed plan limits without alternatives.

Correspondence ID: 1534 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Please leave as is.

Substantive Alternative

Please consider time-of-day usage. We would be happy to have early-morning off-leash permission for our dog when no one is at the beach any way.

Thanks.

Correspondence ID: 1535 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I attended the evening at Tam H.S. for the informational event about dogs. It all seemed civil + adult. When low + behold I felt something on my calve + turned around to see, already feeling, a DOG at me. It was a big dog, on a long leash + when I looked up, the owner looked at me + said nothing. The understanding was there would be no dogs in the building. The owner, she, told people in charge of the event that it was a service dog! A service dog that jumped at the back of my legs!!

Correspondence ID: 1536 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form

Correspondence: I walk my dogs several times a week in Oakwood Valley, and have done so for many years. The dog walkers are a community, and mostly self-policing. Do we really need to spend tax money, build metal gates, and restrict people's long-established and law-abiding behavior at a time like this?

Correspondence ID: 1537 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I see the need to enforce existing rules which are increasingly ignored by a minority of pet owners.

Additional restrictions on pet presence needs to be provided for areas of sensitive wildlife habitat.

Correspondence ID: 1538 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 15:26:50

Correspondence Type: Web Form

Correspondence: I support increased restrictions on dogs in the NPS lands. Alternative D appears most promising to me. I hike a great deal and walk on the beach. Many dogs are not voice controllable, despite what their owners think. I have seen, for example, a dog running up and down the length of Stinson and disrupting all the birds that were feeding, with no owner in sight.

Correspondence ID: 1539 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Angela DiMeglio email: angela@gentletouchdog.com

I see no reason to change the existing policy. That is, I see no reason for increased restrictions. Instead, I would like to offer my help in educating dog guardians + other users.

I would prefer a proactive method.

Thank you,

Angela DiMeglio

The joy of living here is being able to walk on trails + the beach w/ my dog - off leash. Taking a dog to the beach on leash would just be meah. I am

very upset about all this + see no good reason.

Correspondence ID: 1540 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Re: Muir Beach & Dogs

Why not require dogs on leash in sensitive areas ex: keep away from creek at north end during salmon spawning and away from the sensitive areas for birds. Consider example of McClures Beach where birds' areas protected during nesting season.

Correspondence ID: 1541 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Please take into account the indispensable need for medium to large dogs to run freely off-leash. It is their need as much as it is ours to think, speak, learn, do activities, all the things we need to do as humans. The great activity for a day is freedom to run. Please preserve that space for them.

Correspondence ID: 1542 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence: As much open space running room for medium to large dogs is crucial for the safety and well-being of dogs and people. Limiting the space at Fort Funston for off-leash to the small top section and only the strip of beach will create a danger. The dogs will be unnaturally crowded together and will become more tense and more aggressive. Voice control will become more difficult. Dogs socialize best with the greatest possible space. Typically they run up on each other, take a quick sniff and move on. Too much crowding hurt their ability to quickly and easily separate from each other.

Correspondence ID: 1543 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Re: Fort Funston

Elderly and disabled people will have great difficulty reaching the beach

section to allow their dogs to run off-leash. The most important area for them is the top section where the dogs can run around freely.

It is a discrimination against them to force them to walk all the way to the beach area to go off-leash. The dogs need the space and they need their dogs.

Correspondence ID: 1544 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Sutro Hts.

Everyone dog + otherwise confined to trails only + no dogs in picnic areas.

Prefer Map 14D

Ocean Beach

No dogs on walkways, on beaches with possible exception for northern end at strwell 21

Voice control anywehre is a NO-NO

Prefer 15D but can live w/15C

Ft. Funston

No VC anywhere + esp. on trails - everyone (dogs, people, horses) controlled on trails. If what dog owners want is beach access, fine - but confined to smallest area possible.

Prefer 16D, Can live w/ only beach area on 16C

the "Community" of non dog-owning/beach loving humans + community of wildlife are priority to domesticated, pampered, out of control dogs.

Correspondence ID: 1545 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I don't believe there needs to be any action at this. Off leash areas in San Mateo are already scarce.

GGNRA concerns are premature.

Current environmental concerns do not warrant changes to off leash areas

I have not heard of individual complaints or environmental concerns necessitating need for change

Correspondence ID: 1546 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 00:00:00
Correspondence Type: Park Form
Correspondence: 1) Would be best no commercial dog walkers. Voice control does not work. Walking 6-10 dogs a walker cannot keep up. I've watched dog defecate and walker not paying attention.

2) I, as a nature lover, should be able walk trail without dogs interfering everywhere. Should be no dogs on some trails, for my safety, relaxation, and enjoyment. I walked down the Pacheco trail and twice was nearly run over by dogs.

3) Number of dogs should be limited. Walking more than 3 dogs is usually difficult for all but the best trained dogs.

4) Compliance should be 95%. The 75% allows too much disturbance. Dog walkers (owners) on their web site admit 75% at some point disregard the on-leash signage.

5) Dogs should not be allowed on beaches. Shore-birds have no protection and dogs never miss a chance to chase them. Even on-leash they bark at them.

6) ROLAs should be fenced.

7) While dogs are important part of social fabric, they are just one of many, many animals in natural areas and have a negative impact on species that rely upon the park to survive.

Correspondence ID: 1547 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 16:07:35
Correspondence Type: Web Form
Correspondence: I find it hard to believe that the number of conflicts in the GGNRA has escalated to the point where this shear volume of examination and

paperwork were really necessary. The amount of research into the minutiae of every detail that went into this 2,400 page document, while no doubt time-consuming and painstaking, is a classic example of something so overwritten it's barely understandable and certainly impractical for public users. Not to forget the unfortunate rangers that will have to thumb through regulations, trying to figure out which trail from parking lot to field, then field to beach, allows how many dogs per owner, on what day, at what time.

This unique National Recreation area is just that: a recreation area meant to be preserved for recreation, established to preserve the beauty of coastal living for all to enjoy even as the urban areas become more densely populated and suburbs stretch at the seams of growth limits. For every action, there is a reaction and the severe curtailing of the use these lands were designed for, will no doubt stress other open areas and parks, leading to other conflicts among groups of users. Plus many hundreds of small businesses that include pet walking would be affected-and I think it's a safe bet that those business owners are among the most conscientious users of the GGNRA lands because their very jobs depend upon the fact that they observe the rules and avoid tickets.

Surely there has got to be a better way to officially handle the actual conflicts that arise in the GGNRA lands than this unleashed wave of regulations, that insidiously changes the very nature of the purpose for which these areas were preserved; a last wild place for us, our children and our pets to roam.

Correspondence ID: 1548 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 16:09:37
Correspondence Type: Web Form
Correspondence: To Whom It May Concern:

I have a female golden retriever (4 years old) currently and have had several of them through the years. I regularly (at least twice/month) take my dog to Fort Funston where she is off-leash. I take her from the parking lot to the beach and then we also hike around above the beach. I have reviewed the plan for Fort Funston and offer the following comments:

(1) It makes no sense to have an off-leash area at the top, a leashed area, and then an off-leash area down at the beach. The lack of continuity makes no sense and will encourage those who are not responsible to leave their dogs off-leash all over. There should be a way to get down to the beach that does not require a dog to be on-leash

(2) I understand the need to protect wild flora and fauna. A balance can be

achieved. It is not clear from the DEIS that any effort really was made to find a balance. Please keep in mind this is a national recreation area. It is not a national park. Dogs, as well as people, need exercise.

(3) A very close friend of mine is very afraid of dogs. I understand completely that dogs must be leashed in many areas all of the time. Owners are not responsible if they do not comply with that. With that written, however, dogs also need a place to be where they can run around off-leash. I expect, although I've never asked, that my close friend does not go to Fort Funston ever. That's fine. There are other parts of the GGNRA that she can use.

(4) The preferred alternative includes a "nuclear" option where the rules would be changed automatically if compliance is poor. Given, to my mind, the poor design of the off-leash dog area this is completely inappropriate.

Finally, I know this is a time when budgets are very tight. It is not the time to ruin a national recreation area that is so broadly supported in the community because dogs are welcome. These lands are in the public trust for everyone and all uses. If there are irresponsible dog owners and dangerous dogs, they should be treated accordingly. The vast majority of current park users are not.

Thank you for your time and consideration.

Katharine Moore

Correspondence ID: 1549 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 16:23:14
Correspondence Type: Web Form
Correspondence: I've been to many Golden Gate Recreational Parks. Especially Fort Funston. I have never had or seen an incident there involving dogs running off leash. It is always safe and people have control of their dogs. Please don't restrict the use of these parks for those of use who bring our dogs.

Correspondence ID: 1550 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 18:44:10
Correspondence Type: Web Form
Correspondence: Hello

Obviously we are very frustrated by the direction the park service has taken on the off leash issue. Understandably we are all responsible for the

stewardship of our public parks, but I do not agree with the plan that has been put forth by the park service, and managers of the GGNRA

I believe that enforcing the current laws will allow for all parties to enjoy this very valuable piece of open space. If the park police find that people are allowing their dogs to run into sensitive areas of the park, they can be fined. If someone does not have voice command of their dog, then they should be required to keep the dog on leash, or if the dog runs into an area that has sensitive wild life, and flora, they can be ticketed. By banning all off leash dogs (which may turn out to violate the terms by which the land was given to the federal government to manage) you are including all dog owners who responsibly manage their pets into a small group who do not.

This is not an effective way to legislate behavior.

Thank you for your time.

Sincerely, Ryan Lugbauer. Tax Payer, voter, dog owner.

Correspondence ID: 1551 **Project:** 11759 **Document:** 38106

Received: Mar,28,2011 19:07:14

Correspondence Type: Web Form

Correspondence: I've reviewed the draft plan for the GGNRA and appreciate that a number of spaces are suggested to be designated as on-leash areas. I'm commenting to encourage the GGNRA to both designate some on-leash areas and to enforce leash laws in these areas.

I'm the proud owner of an adult dog who struggles with leash reactivity. She is always great with people but has never lived in a place with so many dogs and is having to learn some new behaviors. I adopted her a few months ago and have been working to train her and better socialize her with other dogs, including work with a private trainer and classes at the SF SPCA. She is improving by leaps and bounds.

She loves hiking, but a lot of the accessible hiking areas are either legally off-leash, or the bulk of people who go there flagrantly violate leash laws. It becomes harder to train and manage her around dogs who are off leash, as it makes her feel more vulnerable and defensive to be the one who is on leash. While there are many people who train their dogs for good off-leash behavior, there are unfortunately many who do not, and these owners pose a continual struggle for dogs like mine. I'm eager to have more places to take my dog where we can train and have positive socialization experiences. I know if she has this she'll continue to progress.

A lot of dogs have special needs. Besides leash-reactive dogs who need some extra help and training, there are older dogs, disabled or physically challenged dogs, and even small breeds that can benefit from on-leash areas where approaches by other dogs are more controlled. When there are conversations about dog-friendly areas, our dogs are often the ones who are forgotten. I support off-leash areas for dogs that are comfortable in these spaces. But please, ensure that there is some space for dogs that do better when everyone is on leash, and make sure the laws are enforced so that everyone can have a good experience. The new rules for GGNRA are a great opportunity for dogs like mine.

Many thanks,

Jay

Correspondence ID: 1552 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 21:52:05
Correspondence Type: Web Form
Correspondence: For Dog Sake, Don't put dogs on leash.

I am a dog trainer and handler. My observations during all these years of working with dogs of all ages and breeds has proven to me that dogs just like us enjoy the out doors with out leash and after a good run, and after burning all that cooped up energy because they live in apartments or if any luck, in the back yard waiting for they tired owners to come back from work and take them for a short walk so they don't poop in the house or the back yard. The dogs I take care of run and run and come when I tell them to. so they are under my control although off leash. That makes them happier, makes my clients happier and keeps the furniture happier too. Besides I need to remind every one that that GGNRA was created in the 1970's as the first urban recreation area, that hiking with our off-leash dogs is OUR form of recreation, and that severe restrictions are not justified by the Draft Environmental Impact Statement (DEIS).

Thank you for your time and attention and love for our best friends

Nora Momtazi

Correspondence ID: 1553 **Project:** 11759 **Document:** 38106
Received: Mar,28,2011 22:59:28
Correspondence Type: Web Form
Correspondence: I've lived in San Francisco for 16 years and am implicitly proud of this city's

rational, liberal and diplomatic policies. As a 5th generation San Fransiscan, I am connected to this city and the community in way that most people are not. A large part of what makes this city such as incredible place is it's sensitivity to critical cultural movements and to beings that are in need of a voice; animal rights is no exception, with one of the nation's best SPCA and ACC shelters. But it's not just the shelters. It's also the way the average person here treats animals and i encouraged to show compassion and freedom to their pets through the many, remarkable open, off leash areas available. This 'movement', the call and innate need for pets to run free, to give them their natural right to gallop, play, breath fresh air, is only a possibility and privilege because of the off-leash areas we are afforded here. If it were to be taken away, not only the pets would suffer, but so would the owners, and the sense of community and friendship that naturally arises when animals play and energy is released. The pet owners that walk their dogs in these are dignified people, who pick up after their pets, cater to the animals' every need and live for their companiohship and comfort. By imposing on-leash laws in some of our favorite places, I know Goblin, Bronson, my boyfriend, and our many friends will question this city and our place in it; we have a righ to run free.

Correspondence ID: 1554 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am commenting on the proposed changes to Baker Beach. I have lived in San Francisco all my life & have spent many glorious days at Baker Beach with the various dogs I've had.

I do understand that many people either do not like or are afraid of dogs. They, however, have many options, ie: China Beach - no dogs allowed.

This is an URBAN Recreation Area, not a wilderness area & people will always have dogs. A good dog is one who is able to socialize, run, play & get tired. You can't do that if your dog is always leashed.

My preference for Baker Beach is to leave it as is, however, I realize that is highly unlikely. One proposal seems to have approximately 1/2 the beach designated off leash. I feel that is an acceptable compromise.

Correspondence ID: 1555 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

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Correspondence ID: 1556 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Crissy Field:

No dogs at waters edge of Crissy Field. "Dogs allowed" in any area means "off leash" to owners. Preferred 10B if must allow. Forget Map 10, 10A, 10C, 10D, and 10E

Picnic areas are at 2 far ends of C.F. + are extremely crowded. Enhance that experience by increasing indiv. tables and group picnic areas on 2/3 of Crissy Air Field + reduce that area for dogs by that 2/3. This is an entirely too large area for off leashed dogs + will mean they will cross Promenade + dominate the coastal area on both sides of Pier with uncontrolled dogs.

Fort Mason - Upper:

Dogs should be o-leash only at Great Meadow + a much smaller area in Laguna Green designated. Preferred map 9-D.

Baker Beach:

One well defined/designated/(fenced) off-leash area at far northern end only. Forget maps 12A-B-C-D + esp. E Prefer Map 12 Voice control does not exist- forget this concept All of this is only as good as citations (not "warnings") issued to lawbreakers.

Correspondence ID: 1557 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: It seems to me that in all cases, there should be places for people to enjoy the park area without dogs, with dogs, some on leash and some off.

And it seems to me that there already exist places for all of this. The proposed plan penalized dog owners and dogs unfairly. Fort Funston for example is a wonderful iconic SF location. I know the argument has been made that people without dogs don't go there because they don't like the dogs. I am certain that if they put these rules into effect there will be "no one" visiting the park at all - SF residents are proud of Fort Funston - people come from out of town to see this; I brought my children there to go see dogs as do others. If they want to create an off-leash area, it should be an area where a dog can get exercise - what about from the parking lot all the

Correspondence ID: 1558 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Type:

Correspondence: Fort Funston

I like Plan A - if people don't like dogs the rest of NGGRA area - they can use there are over 120,000 dos in San Francisco and their owner have rights - Only 1% of NGGRA allows dogs - why change it - it is unacceptable

I hate it!

Correspondence ID: 1559 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Type:

Correspondence: Fort Funston

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I hate it!

Correspondence ID: 1560 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Type:

Correspondence: I am in favor of keeping the laws the way they are because there area already many restrictions on dog off leash areas. There are more dogs in San Francisco than children. Dogs are a huge part of SF culture and this willll not change it will only increase. The small majority of people in favor of adding more dog restricted areas are people who dislike dogs. Its not really about "wildlife concerns". By making these ridiculous laws, SF locals will be negatively affected. I think the green voice tags that are enforced in Boulder, CO are a better option. I think this would limit the so-called "aggressive dogs" from being off leash. I take my dog to Crissy Field all the time and I have never even seen a dog mess with wildlife. There was a headless dolphin at the beach in Pacifica and the dogs there couldn't have cared less. They just want to play with their frisbees and get energy out. By restricting dogs to be off leash, they will only become more aggressive. Lastly, I wish more residents knew about this initiative. I am positive that more dog owners would be concerned if they knew.

Correspondence ID: 1561 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am disabled. I am in a wheelchair. I too need somewhere I can go and let my dog run free and off leash so that he can get some real good exercise and fresh air. This makes for a happier, contented, well behaved, well balanced dog. Please do not make less off leash area available. Why not create more off leash areas? No one ever does this. It is always less, never more. Or one for one. As one place is restricted, open up some space elsewhere.

Looking at the maps provided the plan proposed is very restrictive to all current off leash areas.

Suggestions: Spend time to enforce the current areas and rules.

For every square foot of land restricted in one area, open up an equivalent amount of off leash in another area.

Allow people who walk their own dogs to have the freedom they currently have but place restrictions on the "Professional dog walkers" i.e numbers of dogs they can walk at one time together and where.

Correspondence ID: 1562 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: The current regulations are not enforced. In areas like Ft. Funston and its

trails it would be beneficial to publish and post the regulations so they can be enforced prior to modifying the existing usage situation. Given the driver for the issues is heavily dependent on potential interactions between people and offleash dogs - you do not have a valid baseline on the issues until enforcement is in place. As a result making a change is premature.

Correspondence ID: 1563 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I have used Fort Funston to walk my dogs for over thirty years. My wife and I take our dog there twice a day. The area that will be excluded is paved. There is a dog watering station. 95% of the use I put the facility to will be eliminated. I am a local business owner, House to Home Remodeling. I am 58. Many days my knees will not allow me to walk on loose sand. My doctor says I should walk 1 mile daily. Many of the older and elderly people who walk their dogs at Fort Funston require this exercise for their health. HOW DO you intend to accomodate the disabled, elderly, young parents with strollers, people with canes in your new plan.

The notion that you would restrict the area of the park that has been altered the most from its native state lacks even the most basic logic. The area you intend to restrict dogs to being on leash (north from the parking lot to the beach access) is the area that would make the most sense to have the dogs off leash. This seems to be the type of decision that would only be made by a committee of insulated individuals without any public input.

Correspondence ID: 1564 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I support no changes to current policies and regulations.

I do support enforcement of current rules.

It is too drastic to expect us to adapt to restrictions after lifetimes of freedom.

Thanks for reading my comments

Correspondence ID: 1565 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Ocean Beach: NO CHANGE to current laws

This exemplifies compromise, as there are clear barriers for on leash and off-leash activity. People who do not want to be near dogs that are off leash can visit other areas that are restricted. People with dogs can enjoy off leash activity in a very small area.

Focus on enforcement fo current law rather than changing it. I am on the beach every day, 2x a day, and I rarely see park rangers.

In regards to environmental degradation, there are many contributors- not just dogs. #1) environmental/weather conditions #2) retaining wall repairs #3) children who run and play in dunes #4) the homeless encampments in dunes. You can't leash mother nature, children & homeless people, why punish dogs?

All areas: Compliance of 75% after 12 months this needs further definition. What is compliance? How do you measure it? Does it apply to tourists? Is that fair to Bay Area residents?

Correspondence ID: 1566 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Like everyone in a free country, dog walkers have a right to make a living. If you limit them to 3 dogs a t a time, they will have to raise their fee in order to make a living. Then many middle clawss dog owners cannot afford a walker. Their dogs will be unhealthy or the would-be owner will be deprived of the joy of a pet.

You say you have evidence of lessingia damage at Fort Funston by trampling by humans + dogs. Why don't you put up higher fences? Surely there are nice looking taller see-through fences available. The fences I have seen there are low + in a state of disrepair.

Correspondence ID: 1567 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I walk my dog 2x a day at Fort Funston because I have plantar fasciitis, which does not allow me to walk on loose sand or unpaved ground. Funston has a lot of off-leash paved areas currently, where I am able to walk without pain. Over the years, I have observed many elderly and disabled people walking their dogs there because they are able to use their canes and walkers

on the paved path, while their dogs can exercise on the sand.

The new restrictions are clearly discriminatory towards disabled people. You propose to confine us to an area that is mostly loose sand. I believe that there are enough disabled dog owners that a class-action suit can be brought against you for violating the Americans with Disability Act. I am actually thinking about initiating a suit myself and am planning to talk to a friend who is a class-action attorney.

This idea/plan is poorly thought out, inappropriate for today's economy. I have suggested to Gov. Brown that budget cuts might start with the GGNRA. You are clearly out of touch with the desires of the citizens whose taxes pay your salary.

Correspondence ID: 1568 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Dog owners are environmentalists too. With a friend's help, I remove about half a ton of trash every year from Rodeo Beach. Making half the beach off limits to dogs would deter me from going there.

The south part of the beach is almost entirely visited by dog owners in the morning. Putting it off limits makes no sense. And it would mean more trash if I'm not there!

Correspondence ID: 1569 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Is there a ranger available to enforce rules when citizens observe flagrant violations?

Correspondence ID: 1570 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: It appears that the purpose of all this planning is to limit off-leash areas. Why wasn't more effort made to seek out an enlarge off-leash areas. That would show a positive effort to accomodate the large dog-owning community. I see no thought given to this need.

There is a perception that the NPS does not recognize the dog-owning

community as either important or even a major user of this land.

The NPS should be permanently planning to accommodate this use as it would any other user group.

Correspondence ID: 1571 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Thank you for all of your work on this plan. I wish that the GGRNA was dog free as are the other National Parks. I walk every day in the GGRNA. I see very irresponsible dog activity.

#1) Most sad are dogs chasing wildlife, I have heard that when animals smell dogs they may abandon their nests. Dogs disturbing wild creatures is my biggest concern. I have seen dogs at Stinson Beach chase shorebirds until they cannot fly. Their owners just think it is sport.

#2) I have been run into by large dogs and am jumped on regularly. Hikers have the right to walk unmolested by dogs.

#3) Dog waste. When dogs are off leash (and often when on) their owners do not follow after them to clean up. People even let their dogs defecate on the beach.

#4) I do not visit the GGRNA to see dogs. I visit the GGRNA to enjoy natural beauty and wildlife unmolested.

#5) When dogs are present - you simply do not see wildlife.

#6) Dogs have dog parks to run in and exercise without bothering others.

Thank you very much.

p.s. I have witnessed Rangers cursed and screamed at for trying to enforce current restrictions. Thank you for your efforts.

Correspondence ID: 1572 **Project:** 11759 **Document:** 38106
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Correspondence ID: 1573 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I have submitted some comments on line, but since that time PE&E, while looking for their gas pipeline, as destroyed 10's of acres of natural habitat (coyote brush, toyon, oak etc) along Alta. THERFORE, this can not be considered prime habitat and in fact, signals that Alta is an INDUSTRIALIZED zone. I've walked on every dog-allowed trail in the Marin Headlands, walking my dog on Alta 2x per day, weekly on Oakwood Valley Trail and/or Fire road. I've spent 100+ hours/yr pulling broom etc for Park Stewardship much of last 5 years. The dog use on Alta and Oakwood Valley is the PRIME recreational use of these trails, no question about it - 75% of persons using it have dogs (off leash mostly, not including commercial walkers). Despite all of my time spent off trail (in Mission Blue habitat) only once have I ever encountered a dog that shouldn't have been there. 99.99999% stick to the trail/road.

On the basis of my experience (I am a wildlife ecologist, by profession) it appears to me that the decision to change the current dog policy on

Oakwood Valley and Alta Ave trails/fire roads is based on abstractions and no real data. It is a recreational area and people recreate on those trails walking with their dogs (off leash) - my survey 75% (not including commercial walkers) of users. There is also plenty of wildlife. I do not support allowing dogs (on leash) between Oakwood Valley pond and Alta. This would be consistent policy for use of Alta and Oakwood Valley. Therefore, Alternative A

Correspondence ID: 1574 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: 10-E seems logical (Crissy Field) It is preferable to have off leash time limits on East Beach: Before 9: AM After 5: PM

Dogs should NOT allowed in Wildlife Protection Area (WPA)

Correspondence ID: 1575 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: It's very important to have a place that dogs can be properly exercised + walked. A well behaved dog is a tired dog. Dogs need to RUN + play in a safe open area. Ft Funston + Crissy Field provide just the place to achieve this in an urban setting.

San Francisco is unique! No where else is there access to open space right next to a busy city. The GGNRA is not the same as a Nat'l Park, like Yosemite. The original use for the land was an open space for everyone, DOG OWNERS INCLUDED! We pay taxes + will support an open space for our pets.

Correspondence ID: 1576 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Essential to any plan of action or intervention is proof that the intervention has worked before. Is there adequate scientific evidence that dogs are the problem? Perhaps the National Parks could do a "clinical" trial as we do in medicine, implementing their intervention @ certain areas + then have other areas remain the same (placebo group). This trial could be done over 3-5 years period and then the outcomes could be compared (some member of wildlife preservation). If this data is already published or known it should be

displayed. Either way it is good science and would go along way with the citizens of San Francisco. Scientific discovery is the key and if a trial showed documented harm then legislation would be much easier to implement.

Correspondence ID: 1577 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am in favor of the Park's preferred Alternative Plan to reign in the 100,000 dogs that overrun (pardon spelling) so many of the cliffs and beaches of the GGNRA. I care about dogs and I love and care very much about migratory birds. I also care about safety of small children and small or frail or elderly adults. Dog owners either don't care or are kidding themselves that they have their dogs under control. I personally know otherwise - lovely people who don't want their dogs restricted in any way. They think it's so cool for their dogs to freely run into the birds and disperse them. I used to be the same way 30 years ago until I learned how that exhausts the birds. (Some of the same people don't even pick up after their dogs' feces).

Regarding the above-mentioned safety issue- On two occasions - 1 at Crissy Field and 1 at Ft. Funston steps, I was viciously agressed upon by a dog. I yelled for the owner's help, who, in each case was very non-chalant and when I asked "why is your dog ready to attack me like that?" each owner told me "it's because you're wearing a hat." I told the one at Funston, who was close enough, that on warm sunny days enough people weare a visor (which I was wearing) or sun hat for you to put your dog on a leash if your dog is spooked by a hat.

Another friend of mine, who is obsessed with her 3 dogs, had to admit that when they swirl around us playing when we walk that they are knee height + could crash into back of our knees toppling us over.

Sad thing is that the anti-leash side is so well-organized and the people who need dogs to be restrained are not.

Correspondence ID: 1578 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Please do not make Fort Funston on leash. It is very important to me to be able to have a place where my dogs are able to enjoy a free area to stretch their legs, burn off energy, and socialize with other friendly dogs. Fort Funston being off leash also brings the community together. Everyone

respects Fort Funston and tries their best in cleaning after their dog. I will be very sad and disappointed if it becomes on leash. Dogs should have rights! They should be able to be off leash since they are well behaved. My dogs do not bother any wild life. Confined spaces are not healthy for people and their dogs. They need areas to run free to be healthy. I don't want my tax dollars to pay for national parks that are not for off leash dogs.

Correspondence ID: 1579 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I'm writing about the proposed plan for Fort Funston. The only way for my two dogs and I to get any exercise is an off leash jog. I can't run with two leashes with the possibility of tripping. Many who have their dogs off leash is the only way to truly let their dogs free to explore. They are couped up in the house and it is only when they are at these off leash parks do they really feel free.

I pay my good tax dollars to enjoy they parks. Why would I have my tax dollars enforcing these ROLA areas that I did not want in the first place. Why don't we spend the money on education or other major issues, not to regulate dog parks. Please do not take this from my family, we go to Fort Funston every day.

Correspondence ID: 1580 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: 1) "Scientific" reports which are used to base a decision require a peer-review, per NPS Guidelines of Scientific Conduct. Daphne Hatch's Bank Swallow report 2006 makes conclusions which are not based on her data. She makes speculative statements about what dogs could do, but there is no evidence for damage, e.g., digging which leads to burrow collapse.

2) Crowding everyone into a small off-leash area will make it dangerous for people and dogs, i.e. increase aggression + conflicts with people-people and dog-dog.

Correspondence ID: 1581 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Shame on you for even thinking about limiting the areas where dogs can

roam both on & off leash! There are few places we can take our dogs as it is! We are told our dogs can go indoors & now they aren't allowed in the outdoors either!? What are they supposed to do? Just disappear. I think the new legislation is very unfair & as a taxpayer whose money is surely being used towards the outdoor space, me & my dog, who is a member of my family, deserve to use the space too!

Correspondence ID: 1582 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: The great outdoors were meant for EVERYONE TO SHARE, INCLUDING DOGS, who many people consider to be members of the family! Supporters of the new legislation that would limit areas where dogs can roam both on & off leash argue that it would make public spaces, such as parks & beaches, cleaner, but that is simply not the case, for it is not the dogs who are soiling the parks & beaches, but their irresponsible owners, who fail to pick up after their dogs. Even if dogs are not allowed to use these areas, it will not stop people from littering, doing graffiti & other acts of vandalism, or urinating & defecating in public. Thus, the ONLY solution to keeping public spaces sanitary is to ban HUMANS, which of course would never happen. My point is that dogs should not be punished for the actions/inaction of their irresponsible owners. They deserve to enjoy these public spaces too! To take away the already few places that dogs can roam freely is wrong & unfair!! All I have to say in terms of dogs attacking people, is that people attack people too. I think it's unfair to say that the threat posed by dogs is any greater than the threat posed by people. After all, compared to dog attacks, how many more crimes committed by humans have occurred!?! It's certainly possible to be attacked by a dog but then again, it's also possible to be murdered, raped, robbed and assaulted too!!

Correspondence ID: 1583 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I support Alternative A (no change) for Fort Funston. Fort Funston is a very important park for me, my family and our dog. We enjoy walking on the paths and the beach. This is not a pristine park - it is an urban oasis. Fort Funston will never be Yosemite or Yellowstone. Walking at Fort Funston you can not forget you are in an urban area = you hear the traffic, the Pacific Gun Club and scores of folks walking together. Perhaps fencing the trail areas to keep dogs from the sensitive areas (suggestion).

The negative impact on the city parks will be enormous if off leash dog

walking is prohibited at GGNRA areas = where will all those dogs go? Stern Grove, Dubore Park, Golden Gate Park, etc. Those facilities cannot handle greater dog traffic. For this reason alone this policy should not be adopted.

Dogs need exercise. People need exercise. The GGNRA areas open to dogs + people are a much needed haven for city folks.

I have a dog. I vote. Please don't adopt this harsh anti-dog policy.

Last: I truly wonder if this comment process is a mere formality + the will of the people is irrelevant

Correspondence ID: 1584 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Please don't take away Fort Funston from us making it leash only losses it's uniqueness and makes it, unspecial and less fun.

Fort Funston is very organize and will maintained by the public that uses it, making leash only will upset people and would probably not make the effort to care for the park and will result for a very messy and ugly place.

It's very upsetting to know that, you guys want to take away a good thing instead of imbraising it.

It's simple fence the area you want protected not leash dogs.

Rico Tecsan Daly City

Correspondence ID: 1585 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Re: Ocean Beach - preferred alternative: Dogs and their owners should be allowed off-leash south of Sloat Blvd to Ft. Funston. This area is sparsely used by beach-goers and the bluffs are crumbling away & subject to much man-made intervention (rip rap-concrete, etc) to shore up the cliff. Further south the cliff swallows are up on the cliffs, not on the beach, so dogs do not disturb them. I believe this area is not populated by snowy plovers, and I doubt dogs could cause more destruction of the species than man has.

Correspondence 1586 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,29,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: Keep San Francisco's open space available to dogs. We love our pets. And taking them to Ft Funston provides a place for dog owners, their pets, and the entire local public to enjoy the outdoors. Pet owners are very responsible and obey the courtesy rules of dog ownership. There is way that everyone can enjoy these open areas and still get along. Bird lovers, plant lovers, dog lovers all deserve access to these areas. Dogs are part of our culture, please acknowledge their beneficial influence on all humans.

Thank you.

Correspondence 1587 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,29,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: I will submit formal comments but I support no change to existing off-leash access for dog owners to Bay Area beaches.

The existing regs should protect sensitive dune and snowy plover areas. I am a responsible dog owner - pick up after my dog and respect restricted areas,

The proposed regulations do not make enough of a case that dog use will harm the environment.

These areas are urban recreation areas and not wildlife habitats.

Restrictions should not be make for the few irresponsible dog owners. If that were the case, people would be banned from doing just about anything.

This is not a fair or balanced proposal.

Correspondence 1588 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,29,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: I am in support of dogs off leash in the current designated areas, not in reduced areas as the preferred alternatives in the EIS. I will submit my detailed and formal objections to the EIS report and the preferred alternative.

My goal in showing up at this public meeting and submitting this comment is to show my opposition to the preferred alternative and my support of maintaining the current off leash areas.

A simple solution would be to enforce the current rules and regulations instead of re-inventing a new system and boundaries. Current rules and regulations are more than protective for the goals to protect the environment.

Correspondence ID: 1589 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Are there any dog advocates on the SF Board of Supervisors or the GGNRA Board! Who makes the decision? How are these comments factored into decision?

Is this "stimulus" government money driving this change? The money received can be spent on education and improvement/structural instald of policing.

SF needs to take back this area. GGNRA hasn't produce scientific hard data. The snowy plovers in Point Reyes were unsuccessful to mercury (this statement is from a GGNRA report).

Statistics of law data 800+ 1800 incidents doesn't reflect actual usage. These incidents are a small percentage of the annual volume.

Are there any, statistics on actual usage of 1) dog, 2) bird watchers, 3) recreational. Due to fog, wind and cold weather, dog users are the majority to weekend picnics.

Fence repair + what are the current rangers doing now?

Who pays for this potential proposal? w

Correspondence ID: 1590 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I love our beaches, my three children and my DOG!!! Our dog is a member of our family and Fort Funston is a place where we can enjoy the outdoors as a full family unit! I have my children and my dog under voice control. I

walk my Rhodesian Ridgeback Bailey almost every single day at Fort Funston and the new proposals will affect my daily walks. I pick up poop and make sure that my dog does not give anyone unwanted attention. My children are extremely upset about the new proposals. At 15, 11, and 9 they have seen how wonderful Fort Funston is with all the different breeds and many dogs getting along and having fun. They don't understand why things should change.

PLEASE keep the SAME rules at Fort Funston

Correspondence ID: 1591 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: -Plan is too restrictive in off leash areas it will result in too many dogs in too small a space- danger for the dogs + humans. Also possibly more communicable diseases amongst the dogs.

-Putting small dog walking businesses at risk with more expenses.

-With all the parkland it seems pretty severe to take away the 1% for off leash areas.

People + children have so much more latitude + places to go so why restrict off leash even further?

Correspondence ID: 1592 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Public areas are meant for EVERYONE! Discrimination is illegal and discrimination against dogs is NO BETTER. Dogs should be able to play in parks. Dogs should be able to roam LEASH FREE in safe residential areas. People try to talk about how dirty and dangerous dogs are but guess what humans aint no better; the homeless and drug dealers pose a better threat by sleeping, urinating/peeing, doing drugs and bunch of other illegal things in our parks. Ban them BEFORE you ban our dogs. Dont discriminate against animals because they cannot speak and defend themselves.

Everyone and I mean everyone deserves to be able to use PUBLIC AREAS!!!! LET THESE DOGS ROAM!! This is not fair to the dog owners and the affiliates of poeple who own dogs. Lets keep the what few dog play areas we have left open!!! STOP THE DISCRIMINATION STOP THE DISCRIMINATION!!! LET THE DOG ROAMS!!!

Correspondence ID: 1593 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 09:54:24

Correspondence Type: Web Form

Type:

Correspondence: Dear GGNRA,

As a resident of 38 years, I have come to know San Francisco as an inclusive, tolerant place that respects its citizens and embraces their various life styles.

Adopting this exclusionary policy is a deleterious cultural shift away from what Makes this city, in part, one of the best places to live.

My place of work recently attempted to ban dogs in the work place after 32 years and moral took a noticeable turn for the worse. I was able to work with Human Resources to develop guidelines for dogs in the work place that successfully address the needs and concerns of everybody.

If the GGNRA is compelled to change the way dogs and their owners live within this city, please consider adopting guidelines that balance the needs of all our citizens, not just those with the loudest voices or strongest lobby.

Respectfully,

Eric Friedman

Correspondence ID: 1594 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Type:

Correspondence: I have been walking my dogs in San Francisco for 20 years. San Francisco is unique in it's openness to animals; much like most of Europe. There are 1000 miles of coast in California where native plants and wildlife can thrive. San Francisco is a densely populated area where people need places to exercise their dogs. Compressing the growing dog population into less and less space will only lead to more management issues with this population.

There are more dogs than children in this area and they deserve to be treated as the wonderful citizens that they are.

Correspondence ID: 1595 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: My comments are limited to the proposal to limit off-leash dog walking at Fort Funston. I discovered Ft. Funston 3 years ago when I first received out dog and have been going there every week since. From the beginning, I was amazed at how responsible the majority of dog owners are at cleaning up after their dogs. I see NO adverse affects from the dogs at this location. What I see is a vibrant community of dog owners who travel from all over to enjoy one of our last resources available to let our dogs run off leash. With our state in financial peril, I find it outrageous that taxpayer money is being spent on this proposal and that even more money will be spent enforcing the new leash requirements, I also find it extremely ironic that a ranger riding around on a horse can leave a large pile of shit on the trail without having to clean up after themselves while giving tickets to dog owners who do pick up after their pets.

Correspondence ID: 1596 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am a senior citizen living in SF with a 7-year-old dog. I cannot run fast enough to exercise her adequately on-leash. When off-leash, she is always under voice control.

In off-leash areas, dog owners are responsible about poop, aggressive behavior, and not bothering non-dog people. Bad encounters with aggressive dogs and irresponsible owners usually happen in other places.

We police ourselves and let those people and their dogs know they are not welcome.

Changing present boundaries would seriously impact all parks in San Francisco.

There is no science behind these proposals.

Correspondence ID: 1597 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Dog urine + feces are a public health issue.

Question regarding "compliance-based management": Is the percentage of

compliance based on tickets written or evidence piles on the trail?

I just heard a dog owner complaining about fenced-in dog runs because of the odor! TOO MUCH!

Shorebirds deserve large areas where they will not be scared by or chased by dogs.

Correspondence ID: 1598 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: GGNRA is for recreation- this includes recreation for my dogs, myself and all that nature shares with us! Do not take this away!

I walk with dogs and I am a dog walker. The happiest time in our day is when the dogs & I are recreating and playing at the beach and GGNRA! Without our park area- we would not have exercised- socialized mellow dogs. We are a true community of people who live for our dogs. To limit the amount of dogs would take way my livelihood and people rely on me to care for their loving pets when they work or travel. We are wondering why you must take back what you gave to us and why put a limit when all is going just fine for the last 15 years. I am a home owner I pay taxes I support other small businesses in S.F. Please do not take our GGNRA land away from us - we only make it better.

Correspondence ID: 1599 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Do not punish responsible dogs & owners! We can find a way to work together. Please, we implore you, help us find another way!

Getting rid of dog's freedom is kin to getting rid of a child's freedom.

NO POISON PILL!

Correspondence ID: 1600 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I do not envy the decision you have to make. Many people love their dogs like children and many people want to enjoy quiet, peaceful walks through

the woods and on beaches w/out dogs bothering them.

The Ocean Beach restrictions seem a little unbalanced though. Many people who live in the Sunset will have nowhere to go. You should address the fact that people bother the snowy plovers just as much as on-leash dogs do. I don't remember this being analyzed in the alternatives.

Please also discuss how you can tell coliform bacteria tests can be attributable to dog waste only. If it cannot be distinguished from other animal waste, then it is not a cause effect.

Correspondence ID: 1601 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: -Don't fix what ain't broke! I'm at Crissy Field or Ocean Beach virtually daily. I see first-hand. Problems are minimal. Am for leash restrictions in parking lots and a few sidewalks. Restricting dogs south of entrance 21 at Ocean Beach is NONSENSE. Prevent Bonfires/group events/etc first!

And, most importantly, it is UNETHICAL and virtually illegal for these proposals to include the "Poison Pill" ("Compliance-Based Mgmt. Strategy"). Pure-die B.S.

Share! Behave! Fine when necessary -- more tax revenue! Put up more signs.

BUT LEAVE THE REST ALONE!

Correspondence ID: 1602 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Why didn't you use the 1/2 million you spend on this ridiculous survey on building better fences + signs, MAINTAINING them and/or hiring more Park Rangers to enforce the current rules. The "problems" you are trying to address would be fixed right now if you had.

If the public use of Funston drops when you implement the most intensive restrictions, the need for park Rangers will also decrease, meaning lost jobs.

ggnRa- YOu are destroying one of the most popular RECREATION activities on this land.

Correspondence ID: 1603 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I am very concerned that prof. dog walkers will (already are) move into McLaren Park. Its getting to the point where I can't walk my own dogs...Please don't close these GGNRA areas!! There isn't enough open space for dogs as it is.

Correspondence ID: 1604 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I do not support the changes made in the draft and am very concerned about the availability of off-leash recreation in the SF Bay area. I am out in the GGNRA (Ft. Funston) on a daily basis and my experience is overwhelmingly positive with regards to dogs.

Correspondence ID: 1605 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: If its not broke don't fix it!

Dog owners have the right to enjoy their dog off leach.

My dog + I walk crisy field twice a day and have for the last twelve years. Many people who don't have dogs always stop to say and enjoy petting my dog. Elderly people has well as childrn.

Correspondence ID: 1606 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: As a San Francisco dog owner and dog supporter, I cannot agree w/ your proposed plan. Off-leash dog parks/areas are already difficult to come by and there is NO reason to restrict them even further. Dogs for the most part (grand majority) pose no threat to the habitat and outside visitors. It is extremely rare to see an aggressive or un-controlled dog running off leash or even being walked among other dogs on-leash.

The visitors have plenty of places to visit in Marin Headlands, San

Francisco, and San Mateo taht already do not allow dogs.

The bottom line is that dogs need exercise + socialization and not every dog owner is capable of Running at the dog's speed on-leash. Dogs will become unsocial and destructive if they are not allowed to properly exercise. Please allow the little area that they have in theis area.

I have not seen any scientific studies that prove that the natural environment has suffered because of dogs.

Correspondence ID: 1607 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: As a professional dog walker I am happy to apply for a permit and am in favor of some regulation! But please reconsider the number of dogs to 8 at the very least. It would be economically unfeasible to stay in business walking only 6 dogs.

Also, please allow us to walk from the parking lot to the beach with the dogs off-leash. There is no way we could safely walk to the beach with all the dogs on leash.

Thank you

Correspondence ID: 1608 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: By closing off the majority of Ocean Beach to all dogs, you are crowding every dog into the section of Ocean Beach used by families and children Tourist see this one section of beach, which will be overrun with dogs, while the rest of the beach is empty. This does not make sense. The prime concern should not be convenience for the GGNRA!!

I live in the city and do not think our recreational areas should be treated as wilderness.

Correspondence ID: 1609 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I have been a professional dog walker for 8 years. I am the owner of a

wonderful 6 year old labrador/border collie named Shilo. Shilo's breed requires lots of exercise including long distances of running. She is also very social and needs to play with other dogs. Exercise and socialization are extremely important, particularly for dogs who live in a dense urban environment as it helps them be relaxed and cooperative with all types of people and stimuly. Taking away the areas Shilo enjoys off leash as well as the dogs that belong to my clients (areas we go to are Crissy Field, Baker Beach and Fort Funston) will force us to go to the small, limited dog runs in city parks. The overall impact of this multiplied by many dogs will cause over-crowding leading to unsafe atmospheres for dogs and people.

I have over the years donated much of my time to volunteering at GGNRA and City parks working to keep them clean, planting plants, weeding etc.

I believe there needs to be a better balance in the GGNRA which compliments the vast number of dogs + dog owners in the area. Don't take away the 1% of off leash areas we so value and so need for our happiness + well being!

Correspondence ID: 1610 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Re: Ft. Funston

I have been walking my dog(s) for more than 18 years and as I am now retired, I walk twice a day every day at Ft. Funston.

I would be willing to pay an annual fee to be able to walk my dog off leash. This could be a money making venture for the GGNRA - and, in this economy, why not?

Correspondence ID: 1611 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: -First of all - What is the urgency in which this needs to be implemented?

-Exactly how many snowy plovers have been killed by dogs - I'm willing to bet almost none.

-If you are going to take land away from the dogs - you need to give something in return to them. Compared to other large cities S.F. has the worst and smallest dog parks I have ever seen. There is no regular

maintenance done + the local dog park communities are the ones raising \$ to maintain + upgrade the existing parkls. IE: Upper Douglass dog park - the community raised the necessary money to build a front gate and put in a water fountain. Our parks for dogs should at least be maintained given we all pay taxes. That alone is unacceptable. We need more dog parks - the few we have are all ready full and overcrowded. - which leads to safety and sanitation issues. If you are going to take GGNRA land - you need to use the money raised to give back to the dog community.

-Your scientific data will not be relevant when you expect these changes to take place.

-Puts an unfair burden monetarily on dog walkers and those that own more than 3 dogs.

-Your commecial dog walking Alternatives will put a lot of people out of work - IE- 6 dog limit. This will impact the local economy- which I see is not noted anywhere.

Correspondence ID: 1612 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Re: Fort Funston

Map 16-A largely preserves the 1979 Pet Policy and should be permanently adopted.

In the 15 years that NPS has been trying to limit off-lease dogs at Fort Funston, we dog owners have abided by the seasonal closures and illegal fencing of other areas. Since Judge Alsop's decision voiding your attempt to change the 1979 Pet Policy, the only changes to Fort Funston have been casued by Mother Nature. The "Habitat Protection Area" is now a huge sand dune, the cliffs above the "season closure" have eroded because of wind and the sea - the same seas that destroyed part of the Great Highway.

This map, 16-A, preserves the small area of GGNRA which will change because of weather and surf, dogs have NO adverse impact.

Correspondence ID: 1613 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Formerly from Canada, I moved to San Francisco 6 years ago and one of the

decidly factors was the fantastic offleash parks for walking my dog...Now we are threatened by officials to lose this magnificent freedom. Please reconsider and stop this discouraging plan right now!!

It is what makes this city so special and sets us apart from the rest of the world

Anyone visiting is amazed how dogs and people from such a peaceful community.

Please hear our concerns and give us back this land that was created for all!!

Thank you!

Marjet and Lucee!!

| | | | | | |
|-----------------------------|---|-----------------|-------|------------------|-------|
| Correspondence ID: | 1614 | Project: | 11759 | Document: | 38106 |
| Received: | Mar,29,2011 00:00:00 | | | | |
| Correspondence Type: | Park Form | | | | |
| Correspondence: | There are so many dogs in San Francisco that need a place to run and play. Please allow parks to contiue being off leash. dogs deserve rights too. | | | | |
| <hr/> | | | | | |
| Correspondence ID: | 1615 | Project: | 11759 | Document: | 38106 |
| Received: | Mar,29,2011 12:52:33 | | | | |
| Correspondence Type: | Web Form | | | | |
| Correspondence: | Please don't impose a leash law. There are so very few places our dogs ran run free. Please don't take this beach away. It would break our hearts. | | | | |
| <hr/> | | | | | |
| Correspondence ID: | 1616 | Project: | 11759 | Document: | 38106 |
| Received: | Mar,29,2011 00:00:00 | | | | |
| Correspondence Type: | Park Form | | | | |
| Correspondence: | It is so imperative that dogs have the freedom to be outdoors, in easily accessible areas of SF proper. I have two german shepards, one is 5, the other is 12. They are both well trained, well socialized and reply readily to my verbal commands. | | | | |

I have been using Crissy Field, the presidio & Ocean Beach for 12 years on a daily basis. I regularly pick up garbage from all of these areas and am very aware of the environment & keeping it sound. I pick up not only my dogs waste but any others that I see. Studies have shown that dog owners are 80%

more responsible than non dog owners and I have found throughout the years that this is true. I don't see any one but dog owners picking up garbage and minding the environment, not even the rangers. Please do not take this space from us and our dogs. After all, a good dog is a tired dog and dogs need to run, off leash.

Correspondence ID: 1617 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: My husband + I are environmentalists and we care very much about our beautiful GGNRAis SF + Marin counties. We are also dog lovers. Our dog Rose is 13 years old. One of her joys in life is running on the beach at Crissy Field. Please do not restrict these areas! There is room for all of us. Thank you for your consideration. Open space for all!

Regards, N, MM

Correspondence ID: 1618 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I myself am a dog walker and I agree with idea of needing to have a permit and having a maximum number of dogs.

Keeping a head count on the packs can help the land + also inforce fece issues. I never walk more than 6.

However, dogs need to be socialized and exersized to stay healthy. Walking them only on leash does NOT allow them the exersize they so deserve + need. Dog walkers should only take on well behaved + voice command dogs + keep packs small. With both of these in place, people w/out dogs can jog/run + not feel worried about out of control dogs. Any questionable dog stays leashed alll others should remain free! Thanks!

Correspondence ID: 1619 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Re: Ft. Funston

Charge and entry fee \$X.00 per dog or annual fee...

Correspondence ID: 1620 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I absolutely oppose the Preferred alternative. Dog walking is a legitimate form of recreation. The "no change" alternative is the only acceptable one!

Correspondence ID: 1621 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: The regulation of dog pack numbers will not decrease traffic at the Parks. It will only encourage more dog walkers doing more walks per day, not to mention the dog owners that cannot afford to have their dogs walked professionally. This, I believe, will lead to dirtier parks and more chaos and confrontation than less.

Correspondence ID: 1622 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: My name is Peter Kagel. I live behind the Marina Safeway and walk to the Golden Gate Bridge just about every morning. I have never seen a dog bother anyone, or a dog fight. I've never seen a dog owner fail to pick up their dogs's dodo.

There are no snowy plover eggs visible and I believe that anyone who says they are is making it up. Give a bureaucrat the power to make a rule and he will.

Let the dogs be off leash from the St. Francis Yacht Club to the Bridge. This is about freedom, nothing less.

I am a lawyer and I shall make it as difficult to enforce a leash law as possible.

The official notice given out on where to make comments has building A. True, I found this place but the notice is legally deficient.

Keep San Francisco a liveable city. No leash law along Crissy Field.

Thank you.

Correspondence ID: 1623 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: Dog owners are very vicious people and so are the dogs.

Dogs take on the personality of their owners; so these are people and their dogs should have enclosed areas to frolic in.

No one wants to encounter dogs while trying to enjoy the parks or the beaches.

It is unsanitary for dogs to be pooping on sidewalks and owners do not pick it up.

Let's clean the city of dogs

Correspondence ID: 1624 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: Fort Funston was given to the GGNRA by the City of San Francisco on the condition that its traditional uses, including walking dogs without leashes, playing fetch, etc. would be allowed to continue. Dogs can run off leash in only 1% of the GGNRA. Please do not take that away. There is still 99% for wildlife, birds, people who don't like dogs etc. I say this as a soccer + little league mom. Space is tight in SF, but there is way more space to take a child than there is to play ball or jog with a dog. Fort Funston is full of senior citizens, families, young people - all people enjoying recreation with their dogs.

If hunters can have their dogs off their leashes in National Parks, why can joggers, hikers, + people out of a walk?

Please let people with dogs keep our 1%.

Thank you

Correspondence ID: 1625 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: I can agree with plan C at Crissy Field as I go there often but leave Fort Funston as is. It is a dog wonderland. I am a native SF 62 yrs. Let it be!

Correspondence ID: 1626 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: In the middle Ocean beach area there are drawings providing access at Judah Street and Quintara Street. As observation of snowy plovers have been primarily in the Noriega area and close proximity, if restrictions are necessary at all, they should be limited to Judah South to around Quintara, allowing regular historical access to off leash north of Judah Street and South of Quintara.

There is no shown benefit to complete exclusion of dogs for shorebird wildlife encouragement, these leashed walking areas should continue even where off leash is precluded.

In all the literatures and preferred analysis I have seen no sufficient basis for thinking dog walking is at all related to the problems with bank swallows.

If you wish to have an area for access by people without any presence of dogs at all, I recommend the area just south of the Cliff house and north of the beach Chalet (@ Stairwell 19) as such area is clearly seperable and more frequently visited by tourists.

In no case should the GGNRA block off the ability of the park users with dogs to take a long beach walk from the stairwell 21 anex south to the around Sloat.

Correspondence ID: 1627 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: The preferred alternative for Crissy Field fails to consider the shortage of parking near + adjacent to the field where dogs would be permitted off leash. The lack of parking would prevent many people, especially the disabled and seniors (like me) who cannot walk far, from exercising our dogs (e.g., throwing balls with Chuck-its). Our dogs badly need their exercise and cannot get needed exercise by extremely limited on-leash walking, because we cannot walk very far. We must have convenient off-leash areas. Please change the Preferred Alternative so we can exercise our dogs on the Crissy Field East Beach, where we can park our automobiles and not have to walk far.

Thank you

Correspondence ID: 1628 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Professional dog walkers are the main abusers of the on-leash regulations. I have seen walkers with as many as 11 dogs off leash. The result is feces on trails, dogs trampling native plants and sensitive habitat and a threat (albeit uncommon) to the safety of park users, especially children.

Professional dog walkers should be limited to 4 dogs on leash and should be licensed and pay a fee as other vendors do - perhaps a fenced area could be designated for limited off leash dogs. I support the Preferred Alternative Plan

Jean Colvin Presidio neighbor

Correspondence ID: 1629 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Fort Funston

Leave the 1979 Pet Policy in place. It preserve the recreational uses of Fort Funston from when the city of San Francisco deeded it to the NSP in 1969 (I think). San Francisco has a legal right to take Fort Funston back if NSP changes the use (right of reverter, in legal terms) and we will push the city hard to take the fort back if you restrict dog use. Also, we have complied with seasonal closures & fencing (though both are of dubious value) so what's the problem?

By the way, this "Draft Management Plan" is 14 lbs and nearly \$1 million spent on dubious and often plain wrong "science" is obscene.

Correspondence ID: 1630 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 15:09:39

Correspondence Type: Web Form

Correspondence: As a resident of Marin County and a frequent visitor of Muir Beach and Baker Beach, I strongly oppose to the current proposal of NPS Plan Preferred Alternative D, making it illegal for dogs to be on these beaches. These beaches are special in that they both welcome dogs but also has a clothing-optional section. Making dogs illegal on Muir and Baker Beaches

will negatively affect many, many dog owners who know and love these beaches and care about the ability to share it with their 4-legged friends. The options for beaches to visit with our dogs are already limited and removing these beaches from those options is absolutely unnecessary. I urge you to rethink your proposal regarding these beaches and continue to allow them to be welcoming to dogs and their owners.

Thank you, Jim Yobp

Correspondence ID: 1631 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please don't destroy our dog-friendly outdoor space! Man and man's best friend should be able to responsibly enjoy the public lands.

Correspondence ID: 1632 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 19:50:17

Correspondence Type: Web Form

Correspondence: Dear Frank Dean.

I am a healthy and responsible 75-year-old single woman with two well-behaved dogs. I live in Mill Valley. My principal source of exercise is walking my dogs off leash twice a day, so I have a very strong vested interest in retaining access to off-leash fire roads and trails. I am also, of course, seriously interested in maintaining the habitat of wildlife and the integrity of the environment.

I assume that you wish to come up with a plan that will balance the needs of 1) citizens with dogs, 2) citizens who are afraid of dogs, 3) habitat that is endangered by dogs, 4) the ability of GGNRA to enforce its regulations. Here are my recommendations which are informed by my Mill Valley location but should also apply elsewhere.

1. Establish a "Voice and Sight" program that is in place in Boulder, CO, to give special identification and licensing to dogs that are under voice control. Here is the link:

http://www.bouldercolorado.gov/index.php?option=com_content&task=view&id=5562&Itemid=411 2. Ensure that all off-leash trails provide a continuous round-trip hike, eliminating arbitrary and confusing boundaries. E.g. Homestead Valley Land Trust trails should segue into GGNRA trails, Oakwood Valley should provide a sensible loop. 3. Protect wildlife when it needs protecting. It is my understanding that Redwood Creek, which empties into Muir Beach, provides spawning access to salmon and steelhead in winter months. If it is

concluded that dogs interfere with this access, ban dogs entirely for the spawning months and open the beach to dogs the rest of the year. This all-or-nothing plan would be easy to enforce and would be easily understood by dog owners.

I sincerely hope that GGNRA believes that dog owners want to be part of the solution and will work with you to arrive at a final plan that works for all of the stakeholders. I have been pondering this response ever since I got the initial mailing in January and attended the presentation at Tam High this month. I hope that my suggestions will be taken seriously.

Thanks ?

Margaret Harding Mill Valley, CA

Correspondence ID: 1633 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 21:17:24

Correspondence Type: Web Form

Correspondence: I support the preferred alternative. While my preference is to ban dogs from national parks as is the case elsewhere, I recognize that some dog owners feel "entitled" to run their dogs at the GGNRA. So, I am willing to support the preferred alternative. It balances the need to protect the park's resources, as required by law, and still provide more than adequate opportunity for dog owners to bring their dogs to the park. I would like to point out by the way, that I seldom see dog owners using the off-leash areas at Golden Gate Park. Please limit dog use and protect the park's precious natural resources for this and future generations of Americans. The GGNRA is public land - owned by all Americans, not a private dog run for San Francisco dog afficiandos. sincerely, Louis Blumberg, San Francisco resident and former dog owner.

Correspondence ID: 1634 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 22:57:50

Correspondence Type: Web Form

Correspondence: If we are honestly encouraging families to live in San Francisco, then we must embrace family lifestyles, many of which include dog ownership. Parents, children, and dogs need places in this city to run free. These proposed GGNRA restrictions are therefore an overly restrictive approach to healthy family living.

Correspondence ID: 1635 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:26:40

Correspondence Type: Web Form

Correspondence: I want to register my disagreement with this proposal

Correspondence ID: 1636 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Crissy Field- recommended solution is fair - anything more restrictive would not really allow dogs any freedom Prefer to keep current restrictions

-Same goes for Ft. Funston recommendation

-San Francisco parks are not set up for off leash use - need to be fenced to prevent dogs from going into the street

Correspondence ID: 1637 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Why are you changing the rules, Chrissy was announced to be an off leash area. Now you are pulling that back. I vote, pay lots of taxes, live hear and asking what is wrong with 12th 10" highg dog walking off leach. No fight very well behaved. It's forever one. Why do we allow 4-5 bikes across, 2-3 baby carriage across, but now we will control "dogs off lead. It really is a small part of the larger picture.

Kevin Howard

Thank you for your work + devotion

Correspondence ID: 1638 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I am not a dog owner - but I believe in the right for dog owners to have the opportunity to let their dogs go off leash.

I suggest that the areas currently designated off leash remain so. If new lands are developed then make those dog free!

Correspondence ID: 1639 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 09:32:59
Correspondence Type: Web Form

Correspondence: Hello National Park Service/GGNRA,

I am a native San Franciscan, and one of the things I most appreciate about having grown up here is the existence of the GGNRA. I understand the need to balance land protection issues with land use by human and dog visitors, and I also understand that the fragility of much native habitat and the consequent need to protect it is part of a "long view" approach to husbanding our collective resources. All that said, as someone who takes great pleasure in hiking the Marin Headlands Trails with my dog (a dog who is voice-control trained), I do not understand in what way on-leash walking on the Coastal Trail would negatively impact habitat. And finally, in general, I wish to say that I think it is beyond too bad that responsible dog owners (that is, people who clean up after their dogs, people who do not let their dogs tear off through brush/habitat, people who have trained their dogs to respond to voice commands) should have to suffer the negative consequences of irresponsible dog owners, as I believe the majority of dog owners who enjoy the GGNRA are responsible.

Thank you for your time.

Hilary R.

Correspondence ID: 1640 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: 1) There should be no commercial dog walkers in GGNRA.

2) Compliance monitoring should observe a level of 95% compliance. If only 75%, the remaining 25% can do too much damage.

3) ROLAs should be fenced. Every effort should be made to allow visitors to avoid dogs if they choose.

4) This GGNRA rule making is for one species only, while the GGRNA lands support thousands of other species and they should be given as much attention.

5) The format for this meeting is excellent. I feel safe and secure, extremely well briefed and very, very, able to express my opinions on many ways. This is much better than the old audience/podium microphone style meeting.

Correspondence ID: 1641 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 11:26:05
Correspondence Type: Web Form
Correspondence: Thank you for extending the deadline.

Will you kindly place the sign that tells dog walkers of this proposal in a visible location near the trash cans and/or other hazard signs at Baker Beach? I only found out about this at Baker Beach where I walk my dog regularly because a fellow walker mentioned the sign at the restrooms where few will see and don't go.

I have yet to see the dog poo left behind by responsible dog owners in nearly a hundred days of visiting Baker Beach. I do however see trash left behind by people. Hope at least there will be a large enough section for dogs left to run freely on the beach because we are in the city not a remote parks area and too few places to do so.

Graciously,

Nancy Mondy

Correspondence ID: 1642 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form

Correspondence: I must say very harsely that I do not agree with any of the proposals by the GGNRA about restricting off leash dog areas in any of the parks. I have been walking my 2 dogs off leash at Fort Funston for over 10 years, every single day. I have only seen the positive impacts on that over the years. The dogs are happy, the people are happy + friendly + even non dog owners that are there seem incredibly happy. In addition the children walk through there with huge smiles + are so overwhelmed with joy. Everyone is very responsible + picks up there feces + there is even a monthly cleanup service for the park. If this amount of space at Fort Funston, Crissy Field, Ocean Beach, and other dog areas are restricted even further then they have been, the results would be devastating for the city. Overcrowding of dogs, (friendly + not friendly) in our way to small city parks, tons of feces on our sidewalks + guaranteed way more dog fights + dog bites on dogs as well as people. Please take all of this into account + leave what little space we have in this great giant city alone so our dogs can play + run in peace with controlled and responsible dog owners right beside them.

Correspondence ID: 1643 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: I must say very harsely that I do not agree with any of the proposals by the GGNRA about restricting off leash dog areas in any of the parks. I have been walking my 2 dogs off leash at Fort Funston for over 10 years, every single day. I have only seen the positive impacts on that over the years. The dogs are happy, the people are happy + friendly + even non dog owners that are there seem incredibly happy. In addition the children walk through there with huge smiles + are so overwhelmed with joy. Everyone is very responsible + picks up there feces + there is even a monthly cleanup service for the park. If this amount of space at Fort Funston, Crissy Field, Ocean Beach, and other dog areas are restricted even further then they have been, the results would be devestating for the city. Overcrowding of dogs, (friendly + not friendly) in our way to small city parks, tons of feces on our sidewalks + guaranteed way more dog fights + dog bites on dogs as well as people. Please take all of this into account + leave what little space we have in this great giant city alone so our dogs can play + run in peace with controlled and responsible dog owners right beside them.

Correspondence ID: 1644 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Preferred Alternative is much too restrictive in many areas. It seems designed to create non-compliance which will then be answered with even more restrictions. This would appear to be a marginally legal tactic. It's obvious that the NPS just doesn't want dogs in the park.

There doesn't really seem to be much thought given to compromise solutions. The committee would appear to have been a sham that was not really taken into the final consideration. For example there could have been restrictions based on day of the week, peak times, etc. that would be much more suitable and would be met with less resistance.

Overall a pretty poor job ot waste tax payers money to produce a 2400 page document just to achieve your own end goal.

Correspondence ID: 1645 **Project:** 11759 **Document:** 38106

Received: Mar,29,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Preferred Alternative is much too restrictive in many areas. It seems designed to create non-compliance which will then be answered with even more restrictions. This would appear to be a marginally legal tactic. It's

obvious that the NPS just doesn't want dogs in the park.

There doesn't really seem to be much thought given to compromise solutions. The committee would appear to have been a sham that was not really taken into the final consideration. For example there could have been restrictions based on day of the week, peak times, etc. that would be much more suitable and would be met with less resistance.

Overall a pretty poor job of waste tax payers money to produce a 2400 page document just to achieve your own end goal.

Correspondence ID: 1646 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I would agree that dogs should be on leashes where appropriate. # specific areas should be allocated for dogs off leash.

Please note that dog walkers are usually rather obnoxious when one asks them to put the 8-10 dogs they are responsible for on leash. They are not and cannot possibly control 8-10 dogs off leash. Dog walking is a business, thus dog walkers should pay to use the parks. We pay to drive on the road. Why not have dogs walkers pay to walk their dogs.

One cannot walk in the parks without dogs running up to one. It is quite unnerving.

Please help us all who would like to enjoy the fresh air and beauty in the parks.

Thank you

Correspondence ID: 1647 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I'm unclear on the meaning of RECREATION in the GGN"R"A. I have been hiking with my dogs for some 25 years at Ft. Funston. On a windy day, like today - erosion is the "impactor" and not myself or the dogs. If you were to look around, the only people at Ft. Funston are dog people, braving the cold and the sand because they love their dogs, they are family!

I'm 77, will be 78 in May, a Korean Veteran, and civil disobedience may be the only choice I have to keep me "upright" and my dogs "free"!!!

Correspondence ID: 1648 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Other

Correspondence: Dogwalkers have become a major problem in the GGNRA because existing leash laws are generally ignored. There are simply too many dogs in the GGNRA to allow for offleash (unless there is a fenced-in dog-run).

Every time I walk on Ocean Beach, Crissy Field/Beach or the Presidio I encounter piles of dog-doo and plastic bags containing (presumably) dog doo. I also see dog guardians allowing their charges to chase shorebirds, which I find cruel.

On the beach at Crissy there must be a great deal of dog pee. That is utterly unappealing for a beach visit. (an pollutes the BAY + LAGOON). I went to Ft. Funston once but will not go back. The place is absolutely gorgeous but it is a reeking dog toilet.

I don't know of any GGNRA place I can visit without encountering dog feces or urine. (The same can be said of the City in general, but this is about the GGNRA)

Being approached by an off leash dog is an unpleasant experience for many, I would like to see Dedicated Enforcement of much more stringent leash laws.

I will leave this anonymously because I am frightened by the militant nature of the pro-off leash crowd.

-With respect-

Correspondence ID: 1649 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I was bitten in the GGNRA by an off leash dog. I did not report it but have just avoided the GGNRA since. Would be nice, to get to enjoy it again if more dog free zones are created. We also be nice to have less off-leash areas and more enforced on-leash areas.

Correspondence ID: 1650 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: The reason I rescued my dog was to walk with freedom on Ocean Beach, Crissy Field + Ft. Funston.

We have been doing so happily for 8 yrs. I am not able to run with my dog, due to a physical condition, but he runs with many of his pals almost every day at one of the above mentioned areas. There MUST be a place to let socialized, voice command behaved dogs to be able to run + swim in SF. We have millions of miles of trails + beach that non-dog people go to. I understand "sharing" of Crissy, and maybe Ocean Beach, to the dunes' anyway, and all non fenced areas at Ft. Funston.

Our dogs are part of our family. We don't have kids. The litter less than children + we pick up after them. We pay the highest rents + taxes in CA for the privledge of these off leash areas. They must not be taken away!

Correspondence ID: 1651 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Keep it status quo. Improve signage and fences. Ticket the irresponsible dog owners.

People afraid of dogs ought to be educated to help them get over their fear. Dogs are incredible helpful companions - they are missing out on the joy.

All the money used to create these plans could have been spend on improving fences + signage.

Give the rangers the power to ticket offenders.

But do not decrease the off leash areas. Protect endangered species with better barracades.

It's irresponsible people not dogs is the issue.

Correspondence ID: 1652 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Under NEPA, you need to hold a public hearing, which this meeting (3/7 - Ft. Maston) is not!

Dogs are already limited to less than 1% of GGNRA lands. To restrict them more is an outrage. The Preferred Alternative in the EIS should not be adopted. If anything off-leash areas should be expanded.

Correspondence ID: 1653 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I might (probably will) mail a letter with additional comments before May 29. But this is my insurance that my comments are in. (I won't be redundant).

I go to Ocean Beach 1-3/4 times a week at various times a day. I've NEVER been there to my recollection with out seeing at least one dog chasing shorebirds, often with the owners watching and doing nothing. Yes, I know this is a minority, but to the migrating birds who need to use their energy to feed, this means that large potential (non-native) predators can interrupt them at any time. The birds are declining as a result. Dogs have other places to go to build community. Frankly, it's not just the beach. I've heard from parents who don't want dogs in the playgrounds where dogs aren't supposed to be, etc.

The National Parks, wherever they are, are supposed to be protecting special status specie. Threatened species, wherever they area. Birds only have so much habitat. Dogs do have more choices. Let the birds have the little habitat we've left them. Let the dogs play elsewhere.

Correspondence ID: 1654 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: As a dog owner of a 4 year old lab who daily visits East Beach, what about the option of time restrictions for ROLA? No weekends, but M-F 6Am-9AM?

My dog adheres to voice control but needs more exercise than a walk. This is my neighborhood and where we spend hours.

I understand the tourists and beach goes and the problem with enforcement. It just seems like good signage could be an option.

Thank you for your consideration.

Janet Dalton

Correspondence ID: 1655 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: The Federal Government has an opportunity in the GGNRA to recognise and act on the importance of exercise and the value of pets in American families by supporting and expanding areas for off-leash recreation.

This is an urban area, and urban needs and the beauty of nature can both be recognized and accomodated

Correspondence ID: 1656 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Why are you afraid to have real public comment? You CANNOT justify taking away the 1% of off leash areas we have now. If there are conflicts it's because we need MORE OFFLEASH SPACE!! You should be ashamed of yourself. This is an urban area, not a wilderness. Shame on you.

Correspondence ID: 1657 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: These plans are focusing too much on limiting dog off leash areas. If anything it ought to be kept the same or expanded. It's essential to quality of life.

Increased visits are not a problem to my mind as someone who visits 3x a week. If people have any altercation it's really rare.

People - tourists come to see the dogs free and running.

These GGNRA areas are used very heavily + devotedly by dog owners + dogs. It is often mostly this segment of society, these areas must be kept open as such.

Put up better barriers for protected areas. Post signs encouraging dog owners to be more responsible. Support + promote dog usage - and watch how well people respond. In kind, penalize the irresponsible.

Correspondence ID: 1658 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: You have roped off areas of Ft. Funston, Crissy Field and Lands End for your Native Plants. We have stayed out of those areas. The only thing left is sand, ice plant, shrubs, pines + junipers. WE don't hurt them! They are not delicate protected species. Your studies are only junk science.

Mother Nature is changing our beaches + cliffs, not dogs. Why do you want to spend \$1 million on stopped me from exercising with my best friends and dogs. Leave your cars and buildings and mix with park users. You'll see how wonderful the experience is. Enforce existing laws but keep it the way it is.

Limiting the number of dogs per person is a good idea.

Correspondence ID: 1659 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Please do not change the off leash law. I enjoy watching all the dogs roam. It is those who don't control their dogs that give the rest of us dog owners a bad wrap. Thos who do not obey should get a ticket but law abiding people who train their dogs well, have good obedience + pickup after their dogs should not be affected.

Thank you.

Correspondence ID: 1660 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 12:36:20

Correspondence Type: Web Form

Correspondence: I will keep these comments short and to the point.

I love dogs, and I enjoy seeing them run free in ROLAs and chase balls and frisbees.

I love birds, including shore birds and birds that are ground nesters.

In general, I am pleased with the plan and its balance.

I think the aims for dog companion human compliance with the regulation

should be higher than 75%. 90%, say, or 95%. 10% of those who use the parks with their dogs is still a LOT of people.

I think there should be more consideration of fencing, since not all humans love dogs the way I do. Some are afraid of large dogs, even well-behaved ones.

Thank you for all the work that went into the Plan and for the public comment period.

Correspondence ID: 1661 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Stinson - How can you take away the whole beach!!! It is not fair that people who have been going to the beach off leash now cannot go at all under the 1st proposed alternative.

Ocean Beach- Why not 2 areas for off leash!! If I live by the 200 it would be a hardship to come all the way to the cliff house area without a car!

Chrissy Field- The East beach is a favorite for families to bring their dog - don't penalize them.

There are more dogs than kids - kids do more damage - restrict them.

Correspondence ID: 1662 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 12:42:22

Correspondence Type: Web Form

Correspondence: As a fairly new Bay Area resident (I moved to San Francisco almost two years ago), I have already come to love and depend on off-leash dog areas such as Bernal Heights Park, Ocean Beach, and Fort Funston Beach. I moved to the city with my boyfriend and our dog so that my boyfriend could start a company here. His company is based in SOMA in San Francisco and we live in the Mission. We are full-time city residents bringing jobs and our hard-earned money to this city.

And because we live in the city, we don't have any outdoor space for our 75-pound dog. Areas such as Bernal Heights Park and Fort Funston are our backyard. That's how it works for urban dog owners. And I treat these areas like I would my backyard - keeping them clean and picking up after my dog; not allowing my dog to dig or destroy plants or wildlife. And I treat the

other people in these parks like I would my neighbors - with respect.

We rely on these off-leash areas to provide recreation for ourselves and our dogs. You can't expect people to live in your cities and support the vibrancy and economy of your cities if you don't also provide them with easy access to outdoor areas where they can exercise their pets. Dogs who don't get real exercise (and a 30-foot enclosed dog park doesn't count as real exercise for big dogs), are restless, bored, and destructive. Having real outdoor space in which to run and play is a necessity.

I urge you to consider the thousands of responsible dog owners in the Bay Area, such as myself, who rely on these recreation spots on a daily and weekly basis.

Thanks for your time, Brandi

Correspondence ID: 1663 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Other parts of the country seem to have found more creative solutions than taking the approach of restriction.

What about -->

- Making one of the sites like Ft Funston be a destination "center of excellence" ot dog mgmt. Bring in corporate america to help run in like curry village with 41 Billion spent on pets we can find someone.

-Create time restrictions in densely populated areas like Chrissy Field - weekends before 9 after 4.

restrict Ocean Beach during the summer time - have it people only like dog beach in San Diego.

With signs and clear rules "enforcement" will be just as difficult or easy as the current proposals.

Make this an opportunity to colloborate on a solution not dictate.

Correspondence ID: 1664 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form

Correspondence: I don't even OWN a dog yet I've enjoyed Fort Funston, every day for 5+ years. I'm a little frightened of dogs but have never had an incident. Dog owners are very respectful and handle their dogs well. I enjoy seeing dogs off leash and feel they should have rights to roam freely in such an awesome spot as Fort Funston.

Our state is broke. Please don't waste our tax-payer's money on something that's fine as it is.

Thank you

Correspondence ID: 1665 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Please respect our quality of life & our dogs. I have well trained + respectful of all rules regarding waste, habitat & rules. Don't penalize all dogs & owners fine dogs that are not under control -

Please don't take away our freedom to respect this beautiful park.

Correspondence ID: 1666 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I have an 8 year old lab + I walk her daily at Crissy Field - it would be impossible for her to get enough exercise on leash and I am 82 years old and need to walk on the path for mobility & access-

Please respect our need to have Crissy Field remain open to off leash dogs.

Correspondence ID: 1667 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 00:00:00

Correspondence Type: Park Form

Correspondence: It is obvious by the attention this topic generates that the current plan threatens the quality of life of dog owners.

Walking my dogs is my form of recreation. And I abide to all the posted rules. The "poison pill" in the proposal is akin to saying of some toyota owners speed on the freeway then all toyota owners are banned. It isn't fair to those of us who do abide.

I also think that the core values of the governing body of GGNRA do not put people first, but natural resources. The national park system is critical + vital to our country, but this land is in a densely populated area and we need it to balance the needs of people.

This is not a "dog" issue, this is a "people" issue. I am a homeowner in SF, pay taxes, my employer pay taxes, it's important to me that my needs are met too!

Correspondence ID: 1668 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 13:20:49

Correspondence Type: Web Form

Correspondence: The proposed GGNRA Dog Management Plan (the Plan) should NOT be allowed to go forward. The Plan is unscientific and does not take into account the impact on all constituents, in particular, the large number of area taxpayers that have historically exercised their pets off leash in various areas of the GGNRA.

For the last 10 years, I have run my two dogs off-leash every morning at Crissy Field and the West Beach. I am one of a group of regulars that are often out there every morning, sometimes well before dawn. We know and watch out for each other and care deeply about the area. Recognizing the great privilege it is to have access to this area, we clean up after our dogs, police the area for trash and ensure that our animals stay off the dunes and generally behave. It is usually one of us who notifies the authorities when a seal or other injured mammal washes up on the beach. When we spot the rare dog owner who does not know or is not respecting the rules, we are the ones who inform and enforce.

Under the Preferred Alternatives, many off-leash areas will be closed or become on-leash only. This will force larger numbers of people and dogs onto the West Beach and the portion of Crissy Field that will remain off-leash (more on that silly proposal later). Overcrowding will only serve to increase the number of incidents and contribute to a degrading of the environment. I suspect that the NPS is hoping this will happen and will use it as a reason in the future to close off even this last remaining off-leash area.

With regard to the proposed on-leash restriction of the east portion of Crissy Field, this seems very silly. I asked a park ranger at the open house to explain the logic behind this proposal. He said the NPS would like to host more events "such as weddings" in this area. Really, weddings? Occasional events are already hosted in this area (breast cancer walks, races, etc)with no

apparent conflict, so why close it off for the rare additional event.

Thank you for opportunity to comment and express my displeasure with the proposed Plan.

Correspondence ID: 1669 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Its important for dogs to go off leash. What is the difference between a person walking and a dog walking off leash. We do as much not if more damage dogs do. Dogs don't do much damage. The most they do is run over some plants. Some people can only walk their dog for an hour because they have work. No dog will get exercize on an only one hour walk on leash. Without it they could get a nice walk in. I love my dog and I don't want to see my dog not excise he deserves.

Correspondence ID: 1670 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: As a daily walker, with my dog, I cherish the unique culture we have in the parks in SF. Healthy dogs are exercised dogs.

I can understand limits if people are not responsible, but most owners in SF are and we want what is best for our people and pets.

The parks are safe because we all walk in them with our pets. We would not want empty parks or to push everyone to small confined areas, that would be worse. Also, dogs are better behaved off lead than on in most cases.

Correspondence ID: 1671 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Every day (almost) for the past two years we have taken a walk from the warming hut to East Beach, and have never observed any issues with dogs off leash, only responsible dog owners and very happy dogs! The status quo is just fine with us.

From a couple of cat owners

Correspondence ID: 1672 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,30,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: Crissy Field -

I think plan 10c is fair to all parties concerned. However, selfishly, I would like to have all dogs on leash.

Correspondence 1673 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,30,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: To Whom it May Concern,

Please do not adopt a policy that prevents people & their dogs from the freedom of walking without a leash. It is very important to consider that not only are dogs benefiting from the freedom but people too. I have lived here some 30 years and the freedom to walk has been limited to 1/3 of the space it was say 8 years ago.

I am psychologically benefited by my walks on the beach. I meet others like minded. If my dogs were on-leash - one I wouldn't be inclined to use the park and the park should be for the public for everyone to use. I wouldn't have to stay in my apt. or be relegated to using only the dog parks.

-Also, if the dogs are on leash - I - ME = I = Don't get to take in or appreciate the beauty of the park.

In all the years - all the times I've walked my dogs - usually every day - I've only had one problem with another dog.

Please don't do this - Don't ruin my freedom to use these lands in this city.

Vicki Day

Correspondence 1674 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,30,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: My dog has been running on beaches and in parks off lead since he was 1 year old. We are always responsible and clean up after him, as well as make sure he doesn't dig or disrupt the natural surroundings. If our dog wasn't allowed off lead at Baker or Ocean beach, he would be depressed. I love my

dog, and it would hurt me to see him on lead for 45 minutes around our house rather than out for 1:45 at a beach. It is our responsibility as dog owners to protect our dogs, and by letting these new regulations occur, it will only worsen our dogs lives, and frustrate their owners.

Correspondence ID: 1675 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I support whatever the GGNRA is trying to do - San Francisco has been going to the dogs for too long!!! Yay for you guys!!

Correspondence ID: 1676 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I have been walking on Crissy Field 5 days a week for almost 20 years. I believe the problem of off-leash dogs has escalated tremendously over the last 10 years since the Promenade Trail was refurbished. In my estimation, the professional dog walkers are not the biggest problem. Most of them have their animals on leash until they reach the water's edge. However individual dog walkers or runners or those who walk their dogs while chatting with friends are frequently not paying attention to their animals. Not a day goes by that I do not see a dog defecating while the caretaker is far ahead or behind the dog + does not see, or ignores, the dog's dropping + therefore does not clean up the mess.

Additionally, Crissy Field is used by the frail elderly; mothers with baby's in strollers, baby joggers or in arms; small children on bikes and people with canes, walkers, etc. Loose dogs can be a real hazard to these people. I have seen runners tripped by dogs. I, myself, have been jumped on, growled at and knocked into by dogs. Most owners appear not to understand the meaning of the phrase "Under Voice Control". I have also seen people take their dogs off leash, down to the restricted areas of the beach, chasing birds and even once, harassing an obviously sick harbor seal.

I would like to see dogs leashed at all times on the paths and also see rigorous enforcement of protected areas to keep them free of dogs.

Correspondence ID: 1677 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 16:48:04
Correspondence Type: Web Form

Correspondence: As I long-time city resident and dog-owner, I ask that the Committee please rule out options B and D. Dog-run areas are a vital part of what makes San Francisco the fantastic, livable, vibrant city that it is. As the city has seen waves of new parents flee the city over the past few decades as housing prices elevated and school quality decreased, we could also see dog owners live in and visit the city far less should these areas be taken away. Commercial dog walkers are also vital to our lifestyle in San Francisco. Like many residents, my husband and I work full time and don't have a backyard. It's only through the services of responsible dog walkers that we are able to make the city work for us.

Correspondence ID: 1678 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 18:04:00

Correspondence Type: Web Form

Correspondence: I find it deplorable that my tax money is going to pay for reports and analysis of this nature, and can think of numerous other things that this money can be well spent on. I would like to recommend that the continuation of this process stop immediately. I don't need the government to tell me when, where and how I can make use of my parks, and can't imagine I'm the only one that feels this way. This is part of being a responsible citizen!! You truly don't need to continually tell me what I should and should not do. Stop micromanaging and start working on some of the larger issues we are facing. I would gladly pay money towards these. When there are discussions of parks being closed due to lack of state funds, I will make sure to call my representative and suggest yours be one of them for mismanagement of funds, and will put the word out for others to do the same. With this said, I'm sure they won't close, but maybe the NPS will wake up and see people aren't happy with how they choose to operate.

Correspondence ID: 1679 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 19:03:43

Correspondence Type: Web Form

Correspondence: Dogs and dog owners have rights too. Outlawing off leash walking or banning dogs is just not fair. Just like people who have to watch their children, we dog owners watch our dogs too. Just like people who wants to be free in an open outdoor space, so do dogs. Dogs need exercise and be able to run free just like all living things. There already are many places for people that are off limits to dogs. As a tax payer also, I demand that you not take away my rights to exercise my dog. Thank you.

Correspondence ID: 1680 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 23:37:39

Correspondence Web Form

Type:

Correspondence: I am a long time resident of San Francisco. I love GGNRA and Ocean Beach in particular. It is one of the best attributes of the city. It absolutely should be protected as much as possible for the future enjoyment of the next generations. My comments here are pointed at the protected Ocean Beach area south of stairwell 21.

The principal manner in which residents and visitors alike enjoy Ocean Beach is through in person visits, not necessarily by walking their pets there. I say this as I would like to clarify that the future enjoyment of that part of GGNRA is not dependent on permitting access by dogs.

My main point is this: Dog owners have alternatives as to where to walk their dogs. The local wildlife does not have alternatives-the beach is their home.

This is a simple but powerful argument because it is true. Most dog owners can choose where to walk their pets. Snowy plover, common murre and other endangered birds do not have a choice. The beach is their home. Sea mammals also live there and are also affected by the waste dogs produce. Our enjoyment of the area is not necessary; our best efforts in preserving their home is.

The entire eco-system on Ocean Beach is already under pressure from the phenomenal amount of oil that can be found on the beach on most days. The amount of plastic on the beach is also heart-breaking. I walked there today and in five minutes had more plastic waste with me than I could carry. It does not make sense to deliberately create an environment which makes sustaining wildlife more difficult than it already is.

The birds are continuously being harrassed by unleashed dogs at Ocean Beach in the protected areas. I would contend that increased limitations on access is needed but **THEY MUST BE ENFORCED** diligently. Please step up enforcement of all regulations throughout the beach, not just in the parking lots. I see empty alcohol bottles regularly and under-aged drinking often. An un-enforced law or regulation promotes disdain for law in general and is counterproductive.

I saw today alone in 15 minutes over 10 different dogs off leash in the protected area. I remind folks that dogs should be on leash; this is not always well received. It seems like fining first or repeat offenders could easily generate enough revenue to pay for further law enforcement.

Thank you for considering my opinion.

Correspondence ID: 1681 **Project:** 11759 **Document:** 38106

Received: Mar,30,2011 23:37:41

Correspondence Type: Web Form

Correspondence: I have read over the Executive Summary, and I strongly believe in the preservation of our national lands, especially because they were created to save what beauty is left for the public to enjoy. I am in agreement that dog management in the GGNRA has to become stricter. I live in Sausalito, and I am a regular visitor to Rodeo Beach. I run, bike, and hike in the Marin Headlands every week. I also want to make it clear that I love animal companionship; my family has 3 dogs and 1 cat. Our pets are near and dear to me as if they were my own children.

As far as dogs on the beach go, I feel dogs need to be leashed when they are outdoors - even more so when they are in protected public lands. Because I go to Rodeo Beach every week, I have seen how wild (and calm) dogs can be. Dogs cannot be blamed for their excitement; instead, dog owners need to take responsibility for their pets. Dogs cannot be trusted solely on voice-command, especially on the beach where the waves are loud and the wind makes it hard to even have a conversation, let alone yell instructions out to a dog.

These are the reasons I believe dog owners need to be accountable for their dogs, and why dogs need to be leashed at Rodeo Beach: - I regularly find poop bags right on the beach or right off the trails. Perhaps dog owners mean to pick up the poop bags on their way out after a walk, but often times they don't, so I end up picking up after dogs who aren't even my own. Many times these poop bags are just across the bridge from the "pet waste" container. - Some owners don't even bother to pick up after their dogs. I can't walk barefoot at the beach without watching my every step to make sure I don't walk on pet waste. - Dogs have eaten food right out of my hands when I'm picnicking on the beach. How can I have a picnic with my friends and family when dogs are always running up to us and taking food away from us? I don't feel safe with the children around unattended dogs. What if one of them gets bitten? This can be how children become fearful of dogs in the first place. - Dogs run right into the lagoon, disturbing and scaring away wildlife - ducks, cormorants, gulls, pelicans, etc. I have even seen people chase their dogs into the lagoon. This really upsets me. - Dogs run off trail, and onto the plants on the sand dunes, probably stepping on the nests and eggs of wildlife. I don't want to see the majestic Killdeer disappear because its young are being trampled by dogs. - Just a few days ago when there was finally sunshine after a week of rain, on Saturday March 19, I left my shoes and rain jacket on a piece of driftwood so I could walk in the waves. Then a schnauzer named Rocky peed on my belongings as Rocky's 5 adult

companions looked on, assuring me that everything was all right. How rude and disgusting. How would Rocky's owners have felt if I peed on Rocky, or if my dogs peed on their belongings? Rocky was not on a leash, nor were his owners even trying to use voice-command to control his behavior.

I love dogs, but dog owners need to be responsible for their pets. I believe dogs need to be leashed at Rodeo Beach, along with other places in the GGNRA. If there are dog-friendly, leash-free areas, that would be fine as long as dog owners pick up after their pets and they are obeying the leash law.

Correspondence ID: 1682 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: This is a draconian plan that does not allow out beautiful dogs their freedom & joyous exercise - Please allow Ocean Beach to be the recreational playground for "our best friends" - at the very minimum - allow the stretch from Lincoln to the Cliff House to be off leash friendly.

Correspondence ID: 1683 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: This is the worst plan yet. First the deer kill off at Pont Reyes, then the attempt to shut down the oyster farm. Leave our beaches and our (dog) rights alone!! You will get lawsuits from dog owners too----

Correspondence ID: 1684 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I am a dog owner (have 2 border collie mixes) and we live in Marin County. I walk my dogs twice a day, everyday, rain or shine and always off-leash.

1) There are many, many wilderness areas within GGNRA that are close to being pristine - with abundant wildlife and plant life that should be protected, with minimal impact by humans or domesticated animals, because un-fortunately these all do impact these areas negatively - these areas are so vast, it would be impossible for rangers & park police to patrol adequately.

2) GGNRA is actually being generous in providing ANY off-leash dog

areas at all. Most national parks do not do this.

3) There are AMPLE other off-leash areas in Marin & SF & the East Bay, e.g. almost ALL the fire roads within open space district parks. And there are numerous dog parks everywhere. I feel the combination of these & areas provided by GGNRA provide more than enough choices/variety for any dog owner.

4) The charges, I feel, are brought about by a few bad apples ruining it for other responsible dog owners - there needs to be more education of dog owners, especially those with poorly socialized/aggressive animals.

Correspondence ID: 1685 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Hello, I am a dogwalker & also train dogs. I have been doing this for the past 13 years. I have been taking the dogs that I walk to Ft. Funston (mostly), Crissy Field, Ocean Beach, and Baker Beach for years and have discovered that dogs (when walked together and off leash, under voice control) behave so much better, as they become much more socialized with other dogs, people, children.

I believe that all of the San Francisco County should stay with Alternative A. I feel that cutting back the area we now have would be a disaster. There are almost 200,000 dogs in S.F. alone. We need more areas to walk dogs off leash, not less.

I have never seen any indication that dogs cause environmental damage. The only beings I see causing environmental damage are humans.

I also read a clause in the DEIS that states, when all of this goes through, of 25% of the people break a rule, it will default to the restrictive plan originally proposed. This is setting it all up for failure, as there is always one (or more) people who break rules. I believe that clause should be eliminated.

I am also happy to pay a yearly fee, as a dogwalker, to help the GGNRA.

Correspondence ID: 1686 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am a doctor and encourage people to get out and walk. Fort Funston is a

national treasure. If human user visits drop there by 75%, would you consider yourselves a success?

I support expanded off-leash recreation except in areas that are particularly sensitive like marshes.

Correspondence ID: 1687 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I walk on Crissy Field 6 mornings a week and have for the past 6 years.

My personal experience is that the current program works well and that no action is required or desirable for Crissy Field.

Crissy Field Beach should be off leash allowed from the parking lot at St. Francisc yatch club to the Wildlife Perservation Area.

I don't have a dog, but I do enjoy watching the dogs that a brought there.

Leave it 'as is" - No action required.

Correspondence ID: 1688 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: My dog walks at least twice a week at Crissy Field - most of the time she is off leash. In all of our outings I have yet to see an off-leash dog interfering with the habitat. I have seen children chasing birds on the island in the lagoon and jumping on the dunes within the roped area but never a dog. I am always impressed by how well the dogs and their guardians behave. Dogs need to run not be restrained by leash to maintain their well being. Crissy Field has availed this opportunity while enabling me to enjoy the remarkable setting. I have bee using Crissy since 1976 when I moved to the area. I has always been a source of relaxation for me. The NPS is being short-sighted in trying to restrict access to a public and urban park that is funded by tax payers and private individuals as I have done through GGNRA. THE \$\$\$ that have been spent to promote this unnecessary legislative action could have been spent in a more beneficial way. I am completely opposed to the restrictive plan of the dog management plan.

Correspondence ID: 1689 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form
Correspondence: Hi - I propose a designated time for dogs at Crissy's East Beach - "Dogs allowed (those under demonstrated voice control) off-leash until 9:00 am Sat/Sun - all day M-F

I have a 9 year old lab who loves to swim. I would abide (and currently do) by the posted laws.

Correspondence ID: 1690 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Hi - I propose a designated time for dogs at Crissy's East Beach - "Dogs allowed (those under demonstrated voice control) off-leash until 9:00 am Sat/Sun - all day M-F

I have a 9 year old lab who loves to swim. I would abide (and currently do) by the posted laws.

Correspondence ID: 1691 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I want to congratulate the Park Service for creating a meeting format that feels safe, secure, and gives a wonderful series of opportunities to express my opinion, both personally, in writing, on the easel boards, and on-line. I felt well briefed, given much personal time, and all questions were answered.

Because the "surfer" parking lot is being removed above Rodeo Beach by Fort Cronkite, it would be better for the future bird populations at that wetlands-to-be if the ROLA on Rodeo Beach were constrained from a further 50 meters on the north side. Preferrably, no dogs on the beach, but the preferred alternative could be improved if the northern boundary of that ROLA were moved south 50 meters.

Correspondence ID: 1692 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I feel that the Ocean Beach issue is unrealisti - there is no evidence that the birds are undully disturbed by people or dogs - the vehicles may tho- it is

denying the residents that live in the Sunset the ability to use the beach - if the birds were nesting there it would be different.

At Ft. Funston it is a wild place weather wise most of the year + as an urban recreation area it does not need such major restrictions - if the professional dog walkers are going to be required to reduce the amount of dogs they walk the major objections will be taken care of - too many dogs at 1 time - the restrictions on the beach for the bird seem to be sufficient -

If the fort is taken back to 100 yrs ago - if will be blowing sand across the highway + into the apt complex + Olympic Club - I can't see where that benefits anyone.

Correspondence ID: 1693 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: -There is a huge population of responsible dog owners and their pets in Northern California. This plan seems to ignore this population, and their need for health, exercise, + enjoyment. There is already so little parkland that is available to dogs and their owners. And now that is going to shrink? Seems horribly restrictive + unfair. Many dogs need to run + play to get proper exercise, and that can't happen on a leash.

-What about seasonal restrictions vs. permanent?

-What about having designated dog areas (large areas) that are primarily for dog use? They could be maintained by a dog use fee. Personally, I would agree to pay a maintenance + restoration fee to continue to use these off-leash areas.

-People do far more damage to our environment than dogs. Look at the amount of natural resources that are destroyed + damaged by people - it's huge. Dogs don't do anywhere near that kind of damage.

-I always thought of this city (I've lived here for 17 years) as being a very liberal + compassionate city. But this changes that vision. This highly restrictive plan is really sad and will really hurt the joy + enjoyment for many people and dogs.

Correspondence ID: 1694 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Type:

- Correspondence:**
- 1) The Compliance-Based Management Strategy is unfair and needs to go. It allows a relatively few bad dogs owners to determine how the rest of us get to use the GGNRA.
 - 2) When dogs are walked responsibly in areas under voice control there is no conflict with park rules and the enjoyment of the GGNRA by everyone.
 - 3) The proposed alternatives for Crissy Field Airfield is so arbitrary. It makes no sense. It is a "line" with no geographic meaning.
 - 4) Dog owners are currently able to only use 1% of the GGNRA. For people who want to enjoy the park dog free- they can go to the other 99% of the park. We dog owners can't with our dogs.
 - 5) Cliff swallows at Fort Funston: The nests of the bank swallows are way too high for a dog to bother. Reason for the on-leash does not make sense based on this reason.
 - 6) Lots of the data and studies faulty: Northern Arizona University and SF State data about minorities fear of dogs in parks. Do better studies with larger pools of respondents.
 - 7) Fence off areas where snowy plovers breed during nesting season. Don't use the blanket excuse that dogs bother them when the 1999 Hatch report observed a tiny number of dogs chasing birds.
 - 8) The park is for everyone to enjoy and you are creating much more restrictive rules for one class of people: dog owners and their dogs.

Correspondence ID: 1695 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I am a professional dog behaviorist. Dogs need off-leash recreation to remain socialized + allow for proper exercise. Without this ability, the dogs will be undersocialized and under exercised, thereby possibly leading to potential issues with their behavior + health.

Please allow us to enjoy the land with our well-behaved 4 legged friends.

Correspondence ID: 1696 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form

Correspondence: I am a dog walker who usually frequents the GGNRA lands known as Fort Funston. My dogs & I love it there. I keep them under voice control & out of areas that are indicated as protected. I pick up there poop, & as much as other poeple that I see. I do not take more dogs than I can handle. I try hard to be responsible.

I do not see all people doing this. Many people do not pick up after their own dog. People should be held responsible to the rules that already exist regarding picking up poop. Perhaps supplying more bags - biodegradable would be best - & more can would help. Also peer pressure could help.

I try to keep my dogs behaving properly & were permitted. However it is very difficult to tell regarding certain area if they are protected or not. The fencing is inadequate!! My dogs & I love to access the beach when weather & pack make-up permit. This includes me - a 50 plus year old female dogwalker. I manage my dogs by voice control - I do not believe I can safely manage 6 of them on leash going down hill on rocks & sand toward the beach they covet to be at. I am afraid I would be hurt regularly even attempting this - knee? Shoulder? Head? - who know?! So would other people. Many would not even consider attempting it, thus making this area less accessable! Less accessable = very bad!

Correspondence ID: 1697 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Please leave our open spaces for responsible off-leash dog walking!

Correspondence ID: 1698 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I would like to see as many areas kept open to dogs + their owners as possible. I see the threat of human encroachment, pollution. + trash accumulation as greater threat than dogs. Therefore, in the spirit of Jogn Steinbeck, Jade London, + John Muir, I suggest keeping lands open to dogs - and if I could vote on these - I would recommend Alternative A (No Action) in the majorit of cases. If dogs are a problem to some areas, it's not the dogs, but the owners. For this I see several resolutions (1) provide more gated/fenced areas for people whose pets are not under voice control; (2) fines- fine those owners whose pets are aggressive, observed disturbing wildlife, + owners who do not pick up after their pets; (3) initiate a \$12-\$15 special tag for dogs + their owners to use areas - offleahs or on-leash (4) a certification (?) for dogs under voice command. Let's face it, dogs need space to run uninhibited. How has civilization gotten this far w/o so many rules + regulations? (Really, we need fewer laws and not more.) I'm all for

coastal preservation, but I also see rising sea level + natural erosion as greater threats to wildlife + the environment than peoples' dogs. One rep at this event told me that a dog's digging had contributed to a bunker's concrete fail. Really? A dog broke a bunker? I think the GGNRA should focus more on crime, trash + pollution in these areas - and less on trying to control people's lovable pets. I see on the "Elements common to All Action Alternatives - no dogs in campgrounds or public buildings." Really? So the family that travels w/ their pet can't have it in their campground? Are we to leave our pets at home or with dog walkers (who can only take 3 pets at a time to an area). Do you feel the absurdity?

Correspondence ID: 1699 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: As a dog walker, I carry a leash and respect all newly planted areas, such as by Mori Point where all new plants are "marked". I also enable my dog to be "off leash" when appropriate. Walking every day for 10 years at Mori Point, Montara, and/or Moss Beach, Cliffs at 20 miles per week, I have never had an incident with dogs or birds.

Birders do hate dogs, usually. I however do not hate dogs. I enjoy the noises birds make when they always easily get away from dogs chasing them.

Seems as though we can all get along without new laws, etc. Save your money, keep everything the same...

Thank you,

David Zarate

Correspondence ID: 1700 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Dogs are an important asset to our community. They give love + joy

They should NOT be segretated from people or places.

Thank you!

Correspondence ID: 1701 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Type:

Correspondence: I have been going to Fort Funston for over 10 years.

It is the one park used every day, no matter what weather is going on.

Do not change these off leash rules! My dog works hard as a service dog and he needs his recreation!

Californians are passionate about their dogs. Other states may go with leash restrictions but here dogs have rights.

Correspondence ID: 1702 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: OPPOSE Proposed Plans

Please keep existing (1979) plans and close/change rules only on a case-by-case basis after public hearings.

Specific Concerns:

Mori Point- keep Plan A - all trails open to leashed dogs. Proposed plan forces dogs onto trails most used by elderly + small children (low, flat) - and denies access to longer, more rugged trails needed for dog exercise.

Milagra Ridge- proposed plan essentially closes the entire park to dogs - the single open trail is inadequate

Fort Funston - proposed plan forces too many unleashed dogs in a small area - likely to increase conflict + problems

OPPOSE proposed plan Please keep Existing (Plan A) usage

Correspondence ID: 1703 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: There needs to be more ROLA areas accessible @ Mori Point + Crissy field for Elderly & Handicapped people. Fort Funston (16E) is the better choice for the off leash area/or not just along the ocean -

Crissy Field - "East Beach" - should be open the off-leash - for family + dogs to interact - that is half the fun: to see the joy of people + dogs playing w/a view of the Bay which is accessible for the elderly + families to be

together.

Let the ruffians w/"big dogs untrained" go elsewhere

Correspondence ID: 1704 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I expressed these comments to a ranger and she asked me to write this short note. The everyday users of Fort Funston would like to see it remain as is. It is a safe place for both people and dogs and receives maximum usage. The parking area is full on the weekends, 75 percent full or more on the weekdays. Changing the policy will not increase the amount of use. Educating the users of the park in ways to preserve both the current use and the natural surrounds would be great. For many elderly people Fort Funston is great because they can walk themselves and their dogs. Many elderly have a difficult time leash-walking. I think more of the regular Fort Funstoners would be willing to stay out of a few sensitive areas as long as the majority of the park remains off-leash. Pacifica will be impacted negatively by any change to Fort Funston.

Lastly, I want to state that I do not believe Public Policy can be changed without having a public forum or public hearing, which this is not. That said, the rangers were great, but there was no room for debate. It seems to me the decision has been finalized without a true public hearing.

Correspondence ID: 1705 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I expressed these comments to a ranger and she asked me to write this short note. The everyday users of Fort Funston would like to see it remain as is. It is a safe place for both people and dogs and receives maximum usage. The parking area is full on the weekends, 75 percent full or more on the weekdays. Changing the policy will not increase the amount of use. Educating the users of the park in ways to preserve both the current use and the natural surrounds would be great. For many elderly people Fort Funston is great because they can walk themselves and their dogs. Many elderly have a difficult time leash-walking. I think more of the regular Fort Funstoners would be willing to stay out of a few sensitive areas as long as the majority of the park remains off-leash. Pacifica will be impacted negatively by any change to Fort Funston.

Lastly, I want to state that I do not believe Public Policy can be changed

without having a public forum or public hearing, which this is not. That said, the ranjers were great, but there was no room for debate. It seems to me the decision has been finalized without a true public hearing.

Correspondence ID: 1706 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I live in the neighborhood of Mori Point-

Mori Point: First thank you for the excellent historical references done on signage about the Old Mori Inn and the Mori Family. I'm a member of the Pacifica Historical Society and you did a comendable job.

Mori Trails; I support Mapt 17-E for on leash dog walking, but want access to the bootleggers Steps as well as Lishumsha trail. Also, I'd like to continue walking my dog on leash out to the end ofthe Point at Sunset.

Lishumsha Trail in particular is very smooth for wheels. My neighbor uses an electric cart and occasioanlly comes out with us on walks. Keeping this section of the trail open to on leash dogs also keeps open a good access for disabled visitors with pets!

Bootlegger's Steps are easy for me to go up with my dog, but I can't go down them. Knee problems! Please keep the steps open to on leash too.

* If you post more (more than one) Coyote warning signs around Mori Point, people will be less tempted to let dogs off leash!

Fort Funston: Map 16-E would provide enough off-leash access and preserve natural settings too in my opinion.

I don't envy what your trying to do. You can't please everyone but hopefully your decisions will allow pet owners to still have access to these beautiful areas. And in the process pet owners gain a greater respect for these areas and abide by the rules a little better. Most alread do. More cyote warning signs should help with those who don't.

Thank you!

Correspondence ID: 1707 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 12:37:05
Correspondence Type: Web Form

Correspondence: The Crissy Field planning is of central interest as I use it ever day with my dog. I have used the area daily for many years prior to the U.S. Army's departure. I begin with the thesis that most dogs have to run for the sake of their health and mental balance. Plan B denies this need completely. Alternatives D,C& A appear to distort the logic of sharing between people and dogs...a logic we must all respect. Why put the off leash space in the most people-crowded and busiest area for people? At the same time leave the least used and furthest from parking etc. as a leash area (the area of the field nearest the lagoon) and the most poorly maintained grassy area)? This eastern area does not affect the lagoon, it is broad and does not cramp running dogs the way having the off leash area at the other end would. In short these alternatives have it backward.

Give the children and families that cluster from the swimming pool, trampoline, picnic and other activities at the west end their space. Let dogs run in the wider, but lesser used eastern end of the field which is full of gopher holes.

Thank you, James Noyes

Correspondence ID: 1708 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: FOFU signage + fencing deteriorated

Safety- exposed pipe in of Env. Service Center

People coming from S.M.Co. b/c of closure (Pacifica beach lost stairs)

Upper FOFU

Correspondence ID: 1709 **Project:** 11759 **Document:** 38106

Received: Mar,31,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am very disappointed with the proposed restrictions on dog walking. I contribute to the California Golden Gate & Ntl Park Services, primarily because I see the need for parks and can use them.

1) The ability to bring a dog w/me on my walks allows me to use the trails. It is safer on many levels..I wouldn't go on many trails alone without my dog.

2) Dogs have to be able to run. They are healthier, less aggressive, and better socialized if they are able to run free. On leash, many dogs become

territorial.

3) We have so few trails as it is. Why restrict them further. It would be nice to see some trails extended so you can go from point A to point B (ex Rodeo Beach to Tennessee Valley) or in a loop (Oak Valley Trail). Instead the trails seem to go from Point A up and back.

4) If the dog walkers are the problem, address the problem not the whole. Limit the number to 5 or 6, but don't punish all of us for a few's indiscretions!!

5) We live in an urban area. We have changing demographics. Dogs are part of the family and should be allowed to come with the family. You are limiting too many people with restrictive regulations.

continued

6) While the GGNRA is part of the Ntl. Parks, we need to acknowledge that the uses, maintenance, and funding is different.

I donate to the GGNRA because I want to keep the trails up and maintained - for hiking, biking, running & dogwalking.

If we were in Yosemite or Glacier I would understand the safety precautions associated w/keeping a dog on-leash - namely bears, cliffs and waterfalls.

We are not in Yosemite, rather in Marin. Let the dogs run freely as long as the behave and owners do as well.

Go ahead and fine people for not picking up the poop or for having 15 dogs off leash, but don't punish us for taking our 2 or 3 dogs for a run -

This is getting to be really stupid and makes me wonder how else is the government wasting my tax dollars - How much have we spent on this ridiculous decision already - what happened to the deficit and saving money.

Correspondence ID: 1710 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Hi Frank and Dean,

Thank you for all your efforts today. It's very impressive!

Ft Funston: How about putting some \$ into making Sunset Trail - really fist rate - extending it out to old sunset trail repaving - maybe a railing for elderly, tourists, baby prams etc. This is the scenic sensational view + make it off limits to dogs, and then keep the traditional use of off leash to the rest of ft. Funston. In my 40 years in SF this is a treasured haven for dog walking community. We do cleanups, encourage good dog citizenship

continued

we must respect the intent + the spirit in which these urban recreation areas were handed over. Its a recreation area for SF residents. Rather than more limitations on off leash areas, we should be making more room.

Living at Ocean Beach. Except on beautiful weekends, we (dog walkers) are the only people at the beach. Enjoying the fog. We pick up broken bottles, beercans, trans. Call in about seal pups, dead seals, et... I have never seen a snowy plover + know they are plentiful in other areas + river beds + resent having our needs as residents being subverted - to a bird that is using an urban park - dogs that chase birds should be leashed, but not all of us responsible dog owners.

Correspondence ID: 1711 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 14:28:24
Correspondence Type: Web Form
Correspondence: To Whom It May Concern,

Yesterday as my dog, Coco and I were walking to the beach at Fort Funston, I tried to count the number of people there without dogs. How do you count zero? If it weren't for Coco, I wouldn't frequent the wonderful Funston or developed great love for Ocean Beach. We love both beaches, but the freedom of Funston's off-leash policy rules.

Protecting wildlife and natural areas is absolutely essential. I only hope you understand how essential it is for our dogs to have LOTS of room to run and play off-leash. Coco really takes me for walks. Without her I would spend too much time inside, never having the healing experiences we share at the beach.

As for park personal's safety - I haven't seen a park ranger at Funston in over a year...unless the topless vagabond living on the beach like a castaway is the ranger? At Ocean Beach they drive in trucks, never getting close enough to be in danger of attack. In all of my experience of long walks at these two beaches I have seen maybe 5 doggie dookies. One of those may have been

human.

Please don't limit our dogs to leashes. We both need the space.

Best, Maria Gillespie

Correspondence ID: 1712 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 03:10:35

Correspondence Type: Web Form

Correspondence: The GGNRA did not have as many dogs in the past. Over the past 10 years, I have noticed an explosion of dogs. I used to be ok with sharing the park with the odd dog walker, but now I find that I can't go to the park because there are so many dogs and so many dogs off leash. For this reason, I believe that off leash and on leash areas for dogs should be decreased.

Correspondence ID: 1713 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I have been walking on Rodeo Beach since I was 10 years old (1957) and since I was 20 I have been walking dogs there: Hottie, Reicher, Jet, Coco, Willies, Blue, Colby and Lola. I have never seen a dog fight that resulted in anything but a growl. I have never seen a person bitten. Any trace of these dogs is non-existent, and their impact is negligible. The human impact is enormous- constant waste washing up: medical, industrial, construction, fast food, maritime and food packaging. As such to judge the impact of dogs seems absurd and arbitrary. The entire time I have walked out there I have seen rangers (or in the 50's & 60's maybe an M.P.) a total of less than 10 times.

The experience of walking on that beach with one of my dogs is a spiritual experience - the absence of humans and the presence of a dog - in the mornings, between sun-up and 10 or 11p, maybe 10 of us walk our dogs - year round - there is infrequently anyone else there except surfers, bird watchers - maybe a grade school class once or twice a month. We have the beach to ourselves. We pick-up all dog waste and probably 15 cu yards of human trash a year. The dogs hurt nothing and the experience is wonderful.

Give the entire beach to dogs in the AM + divide the beach between dogs and humans during the middle of the day - again because by 5p everyone else is gone. At the times of year when one is able to walk the entire beach (both north and south) let dogs walk it. The entire beach is only open a few

weeks during the whole year - usually winter.

Thank you

Correspondence ID: 1714 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I have been a dog walker + dog owner for 16 years + I need a place to take my dogs off leash. Not just in a little enclosed park area but a real hike. My dog owner clients need a place on the weekends to hike w/ their dogs + to enjoy the beautiful sights of Crissy Fields, Headlands, Muir Beach, etc.

I am a very responsible dog owner + dog walker only taking 6-8 dogs + respecting the environment. I make sure the dogs are all on voice control + stay near me at all times.

Please don't take our wonderful hikes away. On the weekends, my kids + I love to hike on the trails w/ our dogs in the Presidio or headlands. I think it is important to teach kids how everyone can coexist together.

We needs some off leash dog walking areas + real hiking areas not Mill Valley dogs parks.

In addition, I think limiting dogs in one area like dog walkers gathering should be stopped. I believe this is part of the problem when 3 dog walkers gather to chat you will see 18-21 dogs which is intimidating to some people. 6-8 dogs per dog walker is great but no gathering will probably alleviate the problems.

So in summary, please keep real hiking trails + beaches available for off leash dogs + limit gathering of dogs.

Correspondence ID: 1715 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: (1) Chapter 3 table 6 stated only 3 incidents @ Muir Beach. Yet you're closing the beach. Seems to me that the environmental impacts reported do not substantiate the recommend proposal.

(1a) Muir Beach has fewer incidents than Stinson yet is more restrictive. Don't understand logic.

(2) A management plan should propose managed spaces not prohibitive spaces. For instance allow diff. times of day when dogs can be off-leash, ie early morning when they wouldn't bother visitors.

(3) Muir beach should protect the lagoon but provide ROLA areas. Alt 5-E is more appropriate.

(4) Humans cause impacts at Muir Beach in fire pit & picnic areas more so than dogs.

(5) Dog owners @ Muir Beach pick up after out of town visitors.

(6) If NPS is advocate for: environment and people enjoying parks why would you force dogs into other parks, open spaces and trails? This will cause larger impacts at fewer places. This is a not in my backyard mentality.

NPS should evaluate habitat from a holistic stand point rather than through its own lens. Habitat moves through corridors and connections not in one, singular place.

Correspondence ID: 1716 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I) Dogs are very important to human psychological comfort welfare a. Seeing eye b. mobility dogs c. search + rescue d. TSA dogs - bomb sniffing e. drug sniffing f. search + rescue g. cadaver dogs h. sensing cancer, other diseases + seizures i. because of this, it is our duty + our privilege to take care of them 1) exercise outdoors is critical to dogs' health.

II) People with dogs may taxes. They are used to support children, from pre-K through college. Those of us w/o children have a right to federal funds, too. We thinking of our dogs as a part of our family.

III) For me, the most beautiful sight in the world is happy dogs playing in a beautiful environment.

IIII) Because of physical limitations, I (+ many others) can not go down the cliff in Fort Funston. I want to continue to walk my well behaved dogs along the cliff.

IV) People's children may be afraid of dogs, but a) I'm afraid of their children, who run around with no parental supervision, throwing balls + sticks. b) they will never overcome their fear if they don't meet happy, well

behaved dogs

VI) I would never go to Fort Funston w/o walking a dog. I feel exhilarated when I return

VII) No dogs in GGNRA would overburden state + local off-l parks + lead to more encounters, which would lead to more regulation

Correspondence ID: 1717 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Fort Funston: I prefer alternative A because I believe it is already a restricted areas. Fort Funston is a wonderful, iconic place, a place in which we take complete pride. 99% of the folks who go here stay on trail with their dogs, pick up poop and have good voice control. If they must increase restrictions than they should at least create an area where people can get a good walk and the dog can get exercise. At the very least make the off leash are from the parking lot all the way to the beach access trail and also from the staircase to the bottom of the beach trail.

Anything less than this is destroying what is wonderful about Fort Funston.

Leave the following area off leash: Entrie loop from stairs to beach access trail, in loop including beach. Then enforce the rule!

Correspondence ID: 1718 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: My husband + I are senior citizens, both with health conditions. 2 years ago we got a dog instead of going on medications - she was a young (18 mo) chow/shepard mix + she had transformed our lives! We take her to Fort Funston 3-4 days a week, + walk 2+ miles with her on + off leash. She loves to run, + socialize w/ other dogs + we've put a lot of time + energy into training her to be well-behaved around hang-glidgers, horses, + people as well as animal life including other dogs.

I was horrified when I saw the drastic reduction in on + off-leash area proposed in the DEIS - it's a recipe for failiure considering how many dogs there are in The City as well as San Mateo Count, which has very limited off-leash areas.

I am attaching the flyers which I brought with me today which contain other

criticisms of the draft.

Please help our dogs and us!! We need to play too, & space to do it in. Retain existing off-leash areas so we can provide proper exercise -- Can't fetch, run, play w/other dogs on-leash.

Enforcing this plan will waste precious tax dollars which should be devoted to the impacts of global warming on the GGNRA, including the reduction of snowy plover habitat at Ocean Beach & the cliff habitat of bank swallows.

Eliminating dogs from huge areas of the GGNRA will invite incursions of feral cats, homeless encampments, rats, and coyotes, all in residence 24/7. Is this really what we want?

This plan will drastically reduce access to the GGNRA for dogs and their owners, it will prevent 200,000+ dog owners from getting proper off-leash exercise with their companions. Please help!!!

Dogs, dog-owners and walkers have provided protection from inappropriate behaviors at the GGNRA, as well as participating in clean-ups and other environmental initiatives; this should be a model for the Park Service and not treated as a problem to be controlled and eventually eradicated.

Correspondence ID: 1719 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I have been a citizen of San Mateo County for 12+ years, its the most wonderful place to live, with that being said, I would like to comment on "Rancho" in Montara. Rancho was known as McKnee Ranch which many still refer to as such, its a dog walking + horse back riding paradise in a area that is turning from rural agricultural to urban. I have walked + ridden there trails for all that time, lately however I am taking note of the amount of dog walkers on these trails. Dog walkers are the majority no doubt about it. People love their animals + they really are part of the family, therefore we enjoy our time with them + wish the GGNRA to consider our family members. Let is continue to enjoy, preserve, and maintain a most beautiful area of our county + coast line.

Please consider the majority + let us enjoy the trails either on or off leash.

One other point, recently someone was hit on the road walking their dog as well as a dog hit while ON leash. This is a dangerous situation don't let this be the only place to let a dog be a dog.

Thank you,

Dorothy Cendell Montara, CA

Correspondence ID: 1720 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: 1. Keep Fort Funston as is - i.e. off leash dog walking where it currently is allowed.

2. Do I understand that under your recommendations there is to be no unleashed areas in Pacifica?

3. This land belongs to us. We've just appointed you to manage it for us. Please remember this. To best serve all of the land's owners, make a few well defined parts of the GGNRA open to off-leash dogs (Fort Funston, Mori Point, and a few others). People who don't like dogs will have to limit themselves to the other 97% of the GGNRA - all the parks those of us with dogs will not be able to enjoy.

Correspondence ID: 1721 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I am a dog owner currently living in Pacifica, and I used to live in San Francisco. I have owned and walked dogs in both places. Specifically, I enjoy Crissy Field, Ft. Funston, and the Linda Mar/Sharp Park beaches with my dog and child.

I feel very strongly about maintaining off-leash areas in these locations. Open lands and our natural resources belong to all of us, and as a law-abiding tax-payer, I wish to protest further restrictions in our beautiful wild places.

We need to find common ground - literally and figuratively- with our non-dog-owning neighbors on these issues. Satisfactory compromise is possible, and imperative.

Please keep our open spaces accessible and off-leash.

Thanks!

Susan M. Quinton

Correspondence ID: 1722 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I am a Montara resident (a dog owner) who lives at the corner of the Rancho de Corral space at Tamarind + Edison Streets.

2 Issues- (1) Proposed parking lot at end of Le Conte by school w/connector road to the above corner (in heart of residential Montara) Cons: In heart of community, where children walk to + from school daily; this parking lot will be opportunistic for off-hours mischief (do you know how many condom wrappers are picked up daily at Mussel Rock? Do you want the children to walk through all this new trash?) and child predators, as most of the children walk to + from school without parents.

Also, connector will encourage more outsiders to community to walk through to the residential areas and on the trail to open space (technically a paper road + county land) beside our property, where I have built a bridge for community use. If this happens, I will remove the bridge which all of our neighbors use.

2nd Issue- dogs off leash - will be addressed in online comment

Correspondence ID: 1723 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I am attaching an alternative for Fort Funston- Please consider this as a better policy - one that will work, with the least amount of frustration on your part and the part of dog walkers.

-Have a monthly clean-up day so the park at Fort Funston will not get "trashed" - as Superintendent Dean worried.

-Please consider that, although there are incidents of dog bites or fights - the number of dogs out there is great and the conflicts are few. No where in your report do you regard numbers of dogs visiting there parks per day

Correspondence ID: 1724 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form

Correspondence: My main area of concern is Mori Point, because I live in Fairway Park. The availability of the trails as they are (Alt. A) is my strong choice. I walk one dog nearly every day, and access via Pollywog Path. My dog is always leashed. Most dogs I encounter are leashed as well. I have never seen an aggressive dog incident. "Pooper scooper" rules are well-followed. I see less dog waste on the trail than I do in the neighborhood! We, the dog-walking community, are remarkably respectful of the resource we have at Mori Point.

To restrict dogs from certain trails in Mori Point would (in my opinion) negatively impact the property values in Fairway Park. Lord knows we don't need THAT! Every time a home comes up for sale, the Real Estate agents make a big deal about the adjacency of GGNRA. If restrictions are imposed, would I then be required to disclose the restrictions upon sale? Something like "Yes, there's a real nice trail nearby, but you've got to go a mile out of your way if you have a dog...and don't climb those steps, to the point - that's a NO DOG area..." This is a bit silly, but it is not that far off!

I really dislike climbing "Boot leggers steps" but it's good for me to do so. Without my dog, I'd probably never climb them at all. Walking a dog is good for one's health. Please make it easy and enjoyable for us to do so.

"ALT-A YES!!"

Correspondence ID: 1725 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Please keep our dogs able to go off leash. My dog has always been able to run free. She is the most well behaved dog you will ever see.

We take her everywhere. On all our trips. We shop, eat and stay only where dogs are allowed. You should learn to make money on dogs not shun them. Towns like Carmel have learned that dogs are money makers. We come into the city and spend our hard earned dollars. Please go with A in your plan. There may be a few (very few) like one bad apple who have caused problems but if anything make fines more or make more permits needed.

If you do this don't you think there will be more problems due to dogs that do not get enough exercise. Dogs help people keep active. People that are alone can go out more freely with their dog and socialize easier because they have something to talk about. I feel much more comfortable going out to eat with my dog than without. It gives people a way to connect. Please let me have a place to run my dog.

Correspondence ID: 1726 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I support option A for allowing off leash dogs: the options listed in the executive summary do not include a proposal to license dog owner for a fee to walk their dogs on leash. I do support limiting commercial dog walkers to 3 dogs. Or a maximum of 6 dogs. I drive to San Francisco from the East Bay to go to restaurants, hotels, and other business.

I love visiting National Parks and have visited many. In San Francisco one of the travel advantages is the dog friendly attitude of the area.

Dogs are a part of the American tradition. San Francisco and the Bay Area helped start the off leash movement as the nation began implementing leash laws. People need places they can exercise with their dogs and protect the environment.

Let's keep option A and come up with better suboptions.

Correspondence ID: 1727 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I have been taking my dogs to Fort Funston for 22 years. It is the only place that I can enjoy letting my dogs off leash. Some ideas:

(1) Limit the amount of dogs an individual can have at the park at any one time.

(2) Charge permit for professional dog walkers.

(3) For those families that fear dogs reserve the south side (of the parking) of the park for no dogs. I've been contributing to the GGNRA for many years. There should be some space for dog lovers to be able to enjoy the GGNRA lands.

This property belongs to the public + should be managed for all of the public to enjoy. The small percentage of GGNRA land that can be enjoyed by off leash dog walking should remain.

(4) Confining dogs to a smaller area will only cause more behavior problems at Fort Funston

Correspondence ID: 1728 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: If off-leash areas are restricted/reduced, people will all be forced into the same one area. This could create overcrowding and lead to other issues: environmental, dog behavioral, car traffic, etc...

Off-leash exercise is vitally important to a dog's health. Those who receive improper exercise are more likely to have behavioral issues. We, as dog owners, need to have areas to provide the appropriate exercise in order to continue to be responsible dog owners.

Correspondence ID: 1729 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am concerned about Rancho Corral de Tierra Area, especially the area that begins at the end of Farallone Avenue & up the mountain. This area has been predominately used by dog walkers. I moved here in 1996 and have walked the mountain on a daily basis since that time. I began walking my dog on leash but soon noted that almost all the dog owners let their animals loose. I have never observed a dog owner act irresponsibly. Not only do I walk my dog, I pick up my son's dogs (in Pacifica) and bring them to the mountain so they can run free. As far as use for this area, most bicyclists use the road & ride on Montara Mountain (not the POST land). There are some hikers, but compared to the dog people, they are few and far between. The weekends have a greater variety of use, including horses. I have walked 3x daily to once daily for the past several years as I am now retired I wander on the mountain even more. We are avid birders and I am a retired geologist. We care for the land, pick up trash and deposit waste in the proper receptacles (It is a pleasure to see to see the dog waste cans). The Montara group is responsible for well kept trails.

Correspondence ID: 1730 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am handicapped and have a hard time holding a leash and walking my dog. She happens to be a breed that needs lots of exercise. I have gone to many many dog training classes group and private so I have great voice control of my dog. I'm sure I can control her much more much more than most children. I take her out twice a day. She can go 12 mi. to my 1. She is in

great shape. Dogs that have had this much exercise are so much less aggressive. People talk about dog bites. Most of the ones you hear about are family pets that are not socialize and have pent up energy.

I some times would not leave the house, if it was not for my dog. Some days I am in so much pain I don't think I can get out of bed but I know my dog has to run. She has kept me going for 3 years now. I know many people with walkers and canes that would be dead today if not for being able to take their dogs off leash. I see them in the rain walking with their dogs.

I also notice that places where dogs are allowed off leash are much cleaner than streets where dogs are on leash. If you take away our right to walk our dogs of leash what do you think will happen to all the pent up energy of these dogs.

Correspondence ID: 1731 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I walk my dogs at Mori Point - off and on leash - I am very religous about picking up my dogs poop - I walk on the such walked area or the leash

I also love Fort Funston - it is an institution - there are dog GOD's statues there

We enjoy-use and protect our spaces

If my dogs are gone then I'm gone - I won't support State/Federal lands if I have no space to go with my family.

I love and support open space land trust but I use the to have dog friendly (on leash spaces) - I'm an older age - I have dogs not children - I pay taxes + I vote -

Correspondence ID: 1732 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Dog walking is not a crime! Under "new plans/lands" I am an outlaw? I have been walking dogs in Montara for centuries. This is not an acceptable alternative!

Correspondence ID: 1733 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: Please, please, please; allow places for dogs to run. My dog respondes to voice command and is a happy fellow when he is allowed to follow his nose.

Dogs and people need freedom. We call this the land of the free, and we then put up thousands of signs that say NO.

There is probably no happier place in this area than Fort Funston on a nice Saturday afternoon - people and dogs are happy. Don't say no to this happiness. I do realize that many areas should be designated as no pets allowed and/or leash only areas.

Please leave Ft. Funston as it is. And keep some large areas of Ocean Beach, Chrissy Field and the Mori Point area as off leash aresa.

We, the people, are tax payers and have rights. Please be fair and do not make your decisions untill the people (and their dogs) have spoken.

Thank you,

EWA

Correspondence ID: 1734 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: I've been walking my dogs in the Rancho Corral de Terra area for 18 years. During this time I've never had any issues, 19 out of 20 people who walk there have dogs, we have never had an incident.

I hope GGNRA considers alternative "E" and allows dogs off leash, under voice command, in certain areas.

I would suggest some of the steeper trails for dog walkers or a period 1 hour after sunrise & I hour before Sunset for off leash walking.

Please allow us to recreate with our beloved companions.

Correspondence ID: 1735 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Park Form

Type:

Correspondence: I live in El Granada & have been walking dogs along the trails of Rancho Corral de Terra both on & off leash for years. Never have I seen or heard of a problem with my dogs or anyone else's dogs while along these trails.

I would prefer things stay the way they are with the least amount of government intervention but change is coming so option E is the best alternative in that case.

Correspondence ID: 1736 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Type:

Correspondence: I have been a resident of San Mateo County for 19 years. As a taxpayer + a working nurse..I have a stressful occupation + hike with my dogs (2 that are now 4 1/2). George + Grace they are my life I have met friends; we go on "beach walks" together. So this is my social time, my mental health time + my physical activity. I now have to have knee surg March 31st. Many of the areas that you haven't banned dogs entirely, are leash walks - 2 dogs walking on leash, tires no one but me + it hurts! With voice commands we can walk a long distance, enjoying while watching dolphins + sunsets. They get exercises, get tired + a tired dog is a good dog. They don't bark in the yard + are good companions at home.

I could write a book on how important Ft. Funston has been in my life. When my last dog "Boo Boo" a rescue died suddenly of cancer (liver) that's what I did to "heel" my husband drove me to Ft. Funston to go on a walk + hug dogs + caring people. That is the community that will go away - such short trails + limited beach access will ruin this community.

I got my first dog because I was depressed + dogs have to go out, no matter what! They are my antidepressants!

PS- "The Format" of this meeting feels a lot like "divide + conquer."

Correspondence ID: 1737 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Type:

Correspondence: As dog owners one of the most wonderful experiences we have had is our walks with our dog at a number of parks but most especially Fort Funston. It has been a park that we have been proud to tell people from other places about. That our dog can walk free and interact with other dogs + people is great socialize + exercise for our dog and our selves. We always clean up

after our dog + leash him if there is a problem of another dog or because a person who is anxious . We participate in the Saturday clean ups (although often is a hunt because people are generally good about dog clean up). Have places where dogs can be off leash and walk is good for our quality of life as well as the dogs. There are not many places we can go with our dogs, this would be a great loss.

Correspondence ID: 1738 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Pacifica has struggled for years to get an off leash dog park. Approval was recently gotten to establish one on city property - however it is very small because Pacifica does not have a lot of available space. The only other area allowed in Pacifica for off-leash dogs is the Esplanade beach in the north end of the town- however due to the cliff erosion, there is NO access to the beach!

GGNRA has a huge amount of land in Pacifica.

Why can't one acre or maybe a half of an acre be provided for off leash dogs!

Fence it in and the dogs can be contained, so as not to roam areas of 'endangered species.

Correspondence ID: 1739 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Mori Point was bought by Pacifica residents through the Pacifica land trust, at considerable expense, funded by donations - and given to the Park Service with the expectation of preserving existing use.

The proposed plan takes away what we fought so hard to save.

Keep ALL Mori Point trails open to leashed dogs.

Consider also creating some off-leash areas at the top of the ridge.

Keep in mind that the park has relatively low use by dogs + people, + lots of coyotes + bobcats running loose eating snakes + frogs.

Better signage + education is the answer - NOT restricted use.

Correspondence ID: 1740 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Please consider putting up better barriers & fences to protect the land and plants that you (GGNRA) do not want harmed. A lot, if not all, barriers at Funston are insufficient & ineffective. Most are posts (low posts) with wires. When it's windy, a lot of these barriers are covered completely. Dogs AND people can easily cross these barriers. Its not only dogs that cross these barriers into plants. Many times at Funston, there are people who walk onto the protected plants & they're not even with a dog.

If you want to preserve plants please consider more effective barriers that will prevent dogs & humans from crossing. Humans are at fault too. Not just dogs.

Also, please replace the fence on the west end of the park. This fence has been down for about 1-2 years now & is a real safety hazard to all dogs AND people.

Correspondence ID: 1741 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am a Pacifica resident who walks her dog primarily @ Sweeny Ridge. I am unhappy w/ GGNRA preferred alternative which will BAN all dog walking - even on-leash - at Sweeny.

The access from San Bruno is a paved trail with foot-bike-horse-dog and vehicle traffic- seems unfair that those uses will continue but I won't be able to walk my dog.

Please consider ALT E for Sweeny with the addition of the Baquiano Trl to continue on-leash do walking at Sweeny.

I love walking my dog from my front door up to this beautiful open space.

Pacifica will have very few areas to walk dogs on-leash if preferred alt. takes place.

Thank you.

P.S. dog managemetn sinage at trail heads should be more site specific -

Sweeny sign should state the plan TO BAN DOGS

Correspondence ID: 1742 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I want my dog to be off leash @ Mori Point + free to run.

Correspondence ID: 1743 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I live in Pacifica, CA & was drawn to the beauty of the place - I have a small but active dog that needs to run - your Preferred Alternative allows NO place for my dog off leash - I pay taxes too--

At Fort Funston - you allow one Parking lot & a beach that I can barely get to at my age -

I pay taxes too -

You're creating a rule-infested place patrolled & policed - I want my home back -

Correspondence ID: 1744 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Fort Fuston

Plan 16E is the best of the group. I suggest making the wasteland between the parking lot and the waterfountain also off leash. Most of the time it is so blustery you need to cover your face to avoid getting sand in your face. That would be hard to do holding leashes.

The dogs often find this section the best areas for elimination and it is easiest to find and clean up (Mine like their privacy so they wouldn't do their business if they were on leash).

I also think the park should continue to be posted as a high dog use area so people can choose to hike elsewhere if they wish to avoid dogs. The trails don't need them to be on leash only.

Ft. Funston is at best use when used by dogwalkers and friends. Hardly a space is available to park on the holidays and weekends. The Army has

already caused harm to the environment. Why not preserve the Presidio and many other parts of the GGNRA and leave this for urban use.

Correspondence ID: 1745 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 10:10:37
Correspondence Type: Web Form
Correspondence: I am writing to acknowledge my support to continuing the off-leash policy for dogs that currently exists at Fort Funston, in San Francisco. Fort Funston is unique in that it allows dogs the chance to run and roam freely. With no place else like it within many miles of San Francisco, dog owners will be denied the opportunity to exercise their dogs in a place that has successfully been used for this purpose for many years. Denying San Franciscans and their dogs this liberty strikes me as more punitive than stemming from any real grievance regarding nature's balance at Fort Funston- whatever others might claim.

Correspondence ID: 1746 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I used Ft. Funston with my dog daily. As a single woman I felt safe at all hours of the day. My understanding is when dogs were banned the park was crime ridden & dangerous. The dog walkers made it a nice well loved & used park. I rarely go to parks in SF because the homeless, dirt, grime, & smell. Ft Funston is one of the cleanest parks around. The dog walker self-regulate & organize clean-up day.

Hopefully there can be other areas in the city for people in that area to walk dogs off leash.

Correspondence ID: 1747 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: OPPOSE proposed plan

KEEP existing (1979) plan.

New plan is too restrictive - preventing use by the PEOPLE who use the parks the most.

It also forces more dogs into the area most accessible to the kind of people

who want to avoid dogs (elderly, slow walkers, families with small children)

Correspondence ID: 1748 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I think if these restrictive measures are implemented you will see more dogs going to dog parks that are not used to such confinement + there will be more fights, vet bills + stress.

Please reconsider + make longer off leash areas for voice control of course. We want to be legal + good neighbors. Let the people who don't want to be around dogs have their spaces. Let us have ours. I pay taxes + what to be considered. Please Please don't shackle us!

Correspondence ID: 1749 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: There was a section in Via (AAA-magazine) on dog friendly spots + Ft. Funston was listed. S.F. is known as dog friendly! People come from out of state, across the Bay to spend \$ in the area - please keep S.F. dog friendly!

Correspondence ID: 1750 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 00:00:00
Correspondence Type: Park Form
Correspondence: After reviewing the preferred plans for all the counties I see only one area in Marin that would allow off leash voice command dog walking. This is unacceptable.

I walk in the areas that allow dogs to exercise under voice command because I feel the areas are safe. And the dog people make it safer by their presence. They also keep it clean.

Where will the money come from for more park police and more garbage pick up when the dog walkers go away? If you put in only dogs on leash the dog people will stop coming - why would they come they can walk their dogs on leash on the city street. You are alienating and losing an entirely group of free garbage collectors and safety people. Real shame. I won't come if you make these changes. I don't own a dog - never have. But I feel safe. I hope I don't have to be standing there saying I told you so as you start

dealing with gang fights, drug users, biohazardous waste and more. I'm very much afraid I will be.

I would be in favor of increasing the amount of off-leash space. Otherwise Plan A is the least offensive.

Thank you

P.S. You should thank the people who were here from the GGNRA tonight. They defused a lot of anger. And were knowledgeable. In turn Dent owes them by time.

Correspondence ID: 1751 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am a retired disabled person. It is very important for me to walk my dog off leash because I use a cane. He is a good dog!

I think dogs are generally better behaved off leash.

Mori Point- can we have a loop trail with leashes?

Ft. Funston - PLEASE leave the trails off leash! I never saw dogs fighting there. I feel happy meeting the dogs + their people while off leash

Correspondence ID: 1752 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 00:00:00

Correspondence Type: Park Form

Correspondence: The elderly and mobility impaired "people" want equal access with -- ROLA -- it is all about "our joy" of watching and being out in nature w/ your dog and others off leash! Help maintain "less restriction" on the elderly people's access to ROLA for Crissy Field - EAST Beach + Fort Funston. Thank you.

I've heard that some seniors are fearful of off leash dogs jumping on them or knocking them over, that is a small minority. I know a number of senior citizens that go there specifically to interact with people and their dogs, it is the only joy in life they have!! Some seniors need this fresh air, peace of mind, 'socialization' so it is not just dogs that need to keep Fort Funston a ROLA - senior citizens need it too!!!

Correspondence ID: 1753 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,01,2011 00:00:00

Correspondence Letter

Type:

Correspondence March 9, 2011

:

U.S. Senator Diane Feinstein:

<http://feinstein.senate.gov/public/index.cfm?FuseAction=ContactUs.EmailMe>

U.S. Senator Barbara Boxer:

<http://www.boxer.senate.gov/en/contact/policycomments.cfm>

National Park Service Director Jon Jarvis: Jon.Jarvis@nps.gov

State Senator Leland Yee:

<http://lcmsubcontact.lc.ca.gov/PublicLCMS/ContactPopup.php?district=SD08>

Assemblymember Jerry Hill:

<http://democrats.assembly.ca.gov/members/a19/District/default.aspx>

San Mateo County Supervisor Don Horsley: dhorsley@co.sanmateo.ca.us

Bill Bechtell, Montara Dog Group: bechtell@comcast.net

Subject: Rancho Corral de Tierra Dog Management

I am Thelma French, a responsible tax-paying citizen residing in Montara with my husband, Art French, and our young daughter, Amelia, who regularly comes home to visit from college. My family and I have chosen to live in this community for its natural beauty in spite of the fallen trees, loss of power, closed highways, and other inconveniences that befall residents regularly because of the community's close proximity to the wilderness.

The area now in question is a big part of the life of my family that includes a dog. For the 2 decades that we have lived here, and the many more decades prior to our coming, the area has existed and remained as stable as it possibly could. The residents of this community have enjoyed the benefits and more importantly, have taken the responsibility of preserving it the way nature intended. Residents like us enjoy maintaining our health in the company of our pet dogs, at the same time ensuring the health and domesticated manner of our pets. Residents, some more so than others, individually take on manual and financial tasks to keep the area safe, healthy, and clean.

As a tax-paying citizen I am concerned that the GGNRA, an office created for the public, has taken over the land and have spent taxpayer money to

show reason to close off the land to the tax-paying community and their pet dogs. From a tax-payer's perspective, the formula the GGNRA follows is to take the land, close the gate, and let the daily fee payers come in. GGNRA may build infrastructure: clear the land for roads and trails to the mountains, clear vast areas for rest stops, and open up residential and school areas to build a parking structure to accommodate fee-paying tourists. Granted that the GGNRA's plan is well-intentioned, it is a divisive and an inefficient use of tax-payer money. Not all people like dogs, or bikers, or not even each other, if the basis for policy and practice is to be based on that. By closing the gate to specific groups, based on studies that have predetermined conclusions, the GGNRA is choosing to split the community and inciting hatred. The area in question is big enough for everyone. Residents with dogs have been going to a very small part of the area since early last century. We are not criminals. We do not deface the land. Our dogs are voice-controlled. We pick up after our dogs, even pick up any trash we see, simply because we love the area and feel responsible. The use of the small area we frequent with our dogs will not make a thundering, violent change in the ecosystem. In fact, that small area we dog owners use help in making us a cohesive community, responsibly caring for the land.

The Montara Dog Group is an example of that cohesive community I am proud to associate with. We do not have a rigid structure, no scheduled daily meetings, and no monetary backing. We are, however, united in our love for our dogs, our love for the nature walks with our dogs, and we are respectful of the needs of our beautiful, bountiful environment.

As a tax-paying community member, I ask for a disciplined use of tax-payer money in managing public land for the public, and an open-mind and open-heart policy in accommodating different groups of the community to enjoy the public land. There are benefits to the land and community for allowing owners and their dogs to the small area of Rancho corral de Tierra.

Thank you, Thelma French

Correspondence ID: 1754 **Project:** 11759 **Document:** 38106
Received: Feb,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Morton D Paley Berkeley CA 94707-1524

February 25, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Dear Mr. Dean:

I am a resident of Berkeley but often walk on parts of the GGNARA, especially in the vicinity of the Golden Gate. I have reviewed with interest the posted Draft Environmental Impact statement for Dog Management at the GGNARA, and would like to offer the following comments:

Taken as a whole, the Preferred Alternative is the best of the plans offered. It balances the interests of the general public with those of dogs and their owners in a fair manner. It protects highly sensitive wildlife areas such as the nesting places of snowy plover and bank swallow, while providing ROLAs where dogs can run free within sight and voice range of their human companions. For example, it recognizes the importance of the recently restored area of Crissy Field, and at the same time provides a ROLA in part of the old airfield. It is a workable compromise.

An aspect of the DEI that I disagree with concerns walkers of groups of dogs. How can one person keep six off-leash dogs under voice control? At the very least, there should be a test on an individual basis before any license is granted. Also, it is possible that six dogs could frighten a child, even when the dogs are on a leash. I myself have been a dog lover from childhood, and have never had any fear of dogs, but we have a responsibility to protect children from what they may perceive as danger.

The Draft Environmental Impact statement provides an excellent basis for permanent GGNARA regulations.

Correspondence ID: 1755 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Margrit Hall San Francisco, CA 94121

GGNRA Frank Dean, Superintendent Fort Mason, Bldg. 201 San Francisco, CA 94123

Re: Dog Management Plan

Dear Mr. Dean,

I am writing this letter in response to the discussion about no longer allowing dogs to run free at Baker Beach and on the Land's End trail. I am against this proposal.

My dog and I have gone to Baker Beach twice daily for the last five years. It

has been a lifesaver not only for me because of the opportunity to exercise and socialize. But it has been equally vital for the dog, a rescue lab bordercollie mix, who needs to RUN and socialize to be healthy and to behave well in the apartment environment that I live in.

I am PASSIONATE about ENVIRONMENTAL issues and so understand your concern about protecting trails and beaches. Every day, I pick up bags full of trash at Baker Beach, mostly plastic, hoping that this might save a bird or mammal from suffocating. My dog has to hurt or scare a bird yet.

How will a leash law for dogs eliminate TRASH and disturbances by PEOPLE? Also, how will it prevent the hillside from being eroded by people running down the hill rather than using the steps and destroying habitat for birds and the plants they feed and rest on? How do dogs contribute to the vast areas of ocean that have become dead zones because of our trash?

Thank you for reading and considering my letter. I am confident that you will find a solution that will be of a much broader scope than confining dogs to leashes.

Sincerely,

Margrit Hall

Correspondence ID: 1756 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: February. 19, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area, Building 201, Fort Mason San Francisco, CA 94123-0022

Dear Mr. Dean,

As dog owners, environmentalists, and residents of San Francisco, we are very concerned about the proposal to limit off-leash dog walking in Ft. Funston and other parks.

The off leash areas of these parks contribute to the Bay Area's welcoming and diverse environment. The vast majority of the GGNRA is closed to dogs ' and as a recreation area in an urban environment, the GGNRA is absolutely vital as a multi-use area. The vast majority of dog owners are responsible, respectful, and integral to the thriving park system.

We urge you to implement the 1979 Pet Policy as a Special Regulation for the GGNRA. The 1979 Pet Policy was the product of extensive negotiation, and has served us well. It comprises less than 1% of the entire GGNRA acreage, and is the controlling legal authority of the GGNRA at this time.

Further, there are simply not enough off-leash areas in city parks, and the loss of the GGNRA for dogs would put incredible strain on already overloaded city parks. Dog owners want to use the GGNRA precisely because we respect and enjoy the environment ' and our dogs need off-leash exercise.

We are certain we can continue to protect native species and maintain off-leash access in the GGNRA.

Thank you for your time and consideration.

Sincerely , Genanne Walsh Lauren Whittemore

Correspondence ID: 1757 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Maria L Rueda San Francisco, CA 94109 February 21, 2011

Dear Frank Dean,

I am writing in response to the GGNRA Dog Management Plan that is available for 90 day comment. While I appreciate the reasoning behind some of the proposed changes, I believe that we still need to keep a balance of leisure activities with our pets. There are limited areas in the San Francisco area where we can take our pets and enjoy some off-leash play with them and I'm concerned about further removing access to these areas. There are better ways to mitigating some of the concerns for which the plan was created: fines for not picking up dog waste, clearly delineated on-leash and off-leash areas where park visitors can choose their setting, more fenced-in dog play areas to protect wild life, etc.

I urge to please take into consideration the life style of pet owners, specifically those of us who always follow the rules, train our pets, and pick up after our pets. I urge to remember that some of us would like to continue to live in the city. I don't think it's right to send the message to citizens that the only way to play with our dogs, is to live in the suburbs and play in our back yards.

Thank you for your consideration, Maria L Rueda

Correspondence ID: 1758 **Project:** 11759 **Document:** 38106

Received: Feb,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort. Mason, Building 201 San Francisco, CA 94123

Dear Mr. Dean and colleagues:

I strongly oppose the proposed draconian restrictions on off-leash dogs on GGNRA lands! Although I don't have a dog myself, I am a frequent walker at Ocean Beach and Crissy Field, and it is a great joy to watch the dogs there running, swimming, fetching, digging, and otherwise having a wonderful time.

First, the unembarrassed happiness of dogs is a powerful reminder to us humans how easy (and wise) it is to enjoy life.

Second, dogs' openness to strange dogs and people is a valuable social link, a means for people to interact with each other, in a culture that increasingly (and perilously) encourages ignoring one's actual surroundings in favor of some invisible friend on a cell phone.

I can't see anything positive at all that would be accomplished by the proposed restrictions, whereas they would cause a serious reduction in the quality of recreation on GGNRA lands.

Sincerely, Carol Verburg

Correspondence ID: 1759 **Project:** 11759 **Document:** 38106

Received: Feb,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: 15 February, 2011 Frank Dean General Superintendent Golden Gate National Recreation Area Building 201 Fort Mason, San. Francisco, CA 94123-0022

Re: Pet Policy: Muir Beach

Dear Mr. Dean:

I am writing simply to share my view that Muir Beach should remain open to dog owners and their pets. I have been walking my two dogs there for

over 10 years and I have never had any issues with wildlife or with other persons at this beach. Indeed, most beach goers seem to relish the presence of joyful dogs.

I am also confused with how these rules interface with retrievers being in the water at Muir Beach. Would this be off limits, too?

It seems such a shame to limit park use and exclude this happy & healthy form of exercise which has been permitted for decades.

Very truly,

Elizabeth S. Salmon, Mill Valley, CA 94941

Correspondence ID: 1760 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: San Bruno, CA 94066

February 17, 2011

Superintendent, GGNRA Attention ANPR Fort Mason, Building A San Francisco, CA 94123

Dear Sir:

Under no circumstances make an exception to your policy that forbids unleashed dogs.

It is a well-documented fact that unleashed dogs cause extensive damage to native plants and that they endanger the wildlife that live in these open space preserves and national parks. They also pose a danger to small children as well as adults. Not all dogs are gentle or friendly, some are more aggressive than others and could attack without provocation.

It is our opinion, that 98 percent of all dog owners do not have voice control of their dogs and have not trained them properly, if they have been trained at all. And they are often too busy socializing to be aware of where their dogs are or what they are doing.

Our dogs were always on a leash. It was mainly for their protection. We did not want any harm to come to our dogs because we loved them dearly, they were our children. A responsible parent does not put his or her child in

harms way.

Contrary to popular belief, dogs do not need to run free to enjoy themselves. Just being with their masters is reward enough. A leashed dog is a happy and safe dog.

It is the dog owner who enjoys the freedom of an unleashed pet because it frees him or her from having to hold onto a leash. The owners have, for all intent and purpose, relinquished control of their dogs when they are not on a leash, They absolve themselves of all responsibility for whatever damage they cause to the flora and fauna of a natural preserve or national park.

To make an exception to an established policy is to invite future problems. If you make an exception to your policy that forbids unleashed dogs, you will have opened "Pandora's Box."

Sincerely, Richard Pastor Natalie Pastor cc: File

Correspondence ID: 1761 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Enderlein,M/Ovanin,R From: "Enderlein,M/Oyanin,R" <>
Date:Wednesday, February 16, 2011 11:12 AM To: "Robert Ovanin" <>
Subject: Leash Law

I am writing to voice my desire that no changes be made in the "Leash Laws" that are current and already too restrictive in the GGNRA.

We've had dogs in our home since 1970. We've spent thousands of dollars making purchases for them. Our taxes on those purchases contribute to the GGNRA.

Dog walkers currently have enough restrictions. Adding more restrictions will cause many dog walkers to abandon San Francisco. These dog walkers also pay taxes and spend money in San Francisco.

Finally, restricting dog walkers to leash laws will force them to abandon the GGNRA and use more dog-friendly areas in San Francisco. This will place an unfair burden on the City Parks and Recreation Department.

Thank you, R.J. Ovanin San Francisco, CA 94127

Correspondence ID: 1762 **Project:** 11759 **Document:** 38106

Received: Feb,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: February 14, 2010

Patsy Watts San Francisco, CA 94112

The Fort Funston Dog Walkers have enjoyed the walks at Fort Funston for many many years. Now, it has been decided that the dog walkers will be evicted by Golden Gate National Recreational Area.

There are many ocean front sites that are available for the surrounding population. It has been decided that there just aren't enough sites?

Please reconsider this plan and allow the dog walkers to enjoy off leash dog walking. Sincerely,

Patsy Watts

Correspondence ID: 1763 **Project:** 11759 **Document:** 38106

Received: Feb,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: February 15, 2011

To Whom It May Concern:

I have lived in San Francisco for 17 years and for the past 6 years have enjoyed the GGNRA off-leash dog areas with my dog. We go to Fort Funston or Crissy Field at least 2-3 times every week -- these trips are critical for the health and well being of my dog and myself. I feel that the Preferred Alternative outlined in your proposal is overly restrictive, unbalanced, and unfair.

The Preferred Alternative is not balanced. The Preferred Alternative allows dogs to be off-leash on even less land that provided for in the 1979 Pet Policy, including no off- leash anywhere on GGNRA land in San Mateo County. By denying the possibility of off- leash on any new lands that come into the GGNRA in the future, the Preferred Alternative will ensure there is no balance between recreation and protection of natural resources in the future One-third of San Francisco households have dogs but they can currently exercise and enjoy time with these companions on less than 1% of GGNRA land.

Severely restricts recreational access for people with dogs and is a

fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space". Off-leash dog walking is among the recreational activities listed as traditionally occurring on the land that was to become the GGNRA. This new proposal is in direct violation of the GGNRA's original purpose.

Unfairly mandates that any new land that comes into the GGNRA cannot have dogs either on- or off-leash. This restriction goes against the recreational mandate that was a founding reason for the GGNRA. It is unfair, unneeded, and denies the traditional recreational activity of off-leash dog walking that has existed on many of these lands for decades. If new land is added to the GGNRA in the future, dogs must be allowed access both on and off-leash.

Correspondence ID: 1764 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 00:00:00
Correspondence Type: Letter
Correspondence: February 14, 2011

To Whom It May Concern:

I have been a resident of San Francisco for 17 years and enjoying the GGNRA off-leash dog areas for the past 6 years. I go to either Fort Funston or Crissy Field at least 2-3 times every week with my Golden Retriever. These trips to run and swim are truly special occasions for both of us and by far the happiest times for my dog.

I have serious concerns about the GGNRA's off-leash proposal, particularly, the "poison pill" of the Compliance-based Management Strategy. A management plan should not come with a built in nuclear option, which is what this is. This strategy is fundamentally unfair and unbalanced since it - ? Allows the off-leash status to be changed in only one direction (toward more restriction) with no possibility of increased access in the future.

? Circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made.

? Omits critical information about how compliance will be determined, allowing room for misunderstanding and misinterpretation.

? Permits the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance

with the new restrictions.

? Makes the change permanent.

While there should be, and are, enforced penalties for bad actors, the vast majority of people who do not act badly should not be penalized for the bad actions of a few. No number of responsible dog owners will stop what will become the inevitable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. This component **MUST** be removed from the proposal.

Correspondence ID: 1765 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 00:00:00
Correspondence Type: Letter
Correspondence: February 14, 2011

To Whom It May Concern:

I have been a resident of San Francisco for 17 years and enjoying the GGNRA off-leash dog areas for the past 6 years. I go to either Fort Funston or Crissy Field at least 2-3 times every week with my Golden Retriever. These trips to run and swim are truly special occasions for both of us and by far the happiest times for my dog.

I have serious concerns about the GGNRA's off-leash proposal, particularly, the "poison pill" of the Compliance-based Management Strategy. A management plan should not come with a built in nuclear option, which is what this is. This strategy is fundamentally unfair and unbalanced since it - ? Allows the off-leash status to be changed in only one direction (toward more restriction) with no possibility of increased access in the future.

? Circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made.

? Omits critical information about how compliance will be determined, allowing room for misunderstanding and misinterpretation.

? Permits the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions.

? Makes the change permanent.

While there should be, and are, enforced penalties for bad actors, the vast majority of people who do not act badly should not be penalized for the bad actions of a few. No number of responsible dog owners will stop what will become the inevitable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. This component MUST be removed from the proposal.

Correspondence ID: 1766 **Project:** 11759 **Document:** 38106
Received: Feb,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: February 11, 2011

To Whom It May Concern:

I am very concerned about the upcoming vote to take place on April 14 concerning on/off leash dog areas in GGNRA. I am an avid walker and take my dog to many of the areas that are under consideration. I love living in SF partly because of how friendly and open the spaces are. I watch regularly how dog owners pick up litter as well as their dogs feces. We have happy dogs and people living here and I think that is really special. To take the off leash option away would change a lovely, unique culture that is not harming anyone.

I believe we are a respectful, thoughtful and caring group of dog owners in SF and what a shame it would be to not fully enjoy the areas we, and our dogs, have come to consider part of our daily lives. Thank you for your time.

Sincerely, Beth Berliner SF, CA 94118

Correspondence ID: 1767 **Project:** 11759 **Document:** 38106
Received: Feb,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: February 8, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Mr. Dean,

We are writing to offer our reaction to the GGNRA Dog Management /Environmental Impact Statement (DMP-EIS) plan to exclude all dogs from

"New Lands" which would apply to Rancho Corral de Tierra property near Montara.

The Peninsula Humane Society & SPCA (PHS/SPCA) respectfully asks that GGNRA considers allowing off-leash play in the relatively small areas (of Rancho Corral de Tierra's total acreage) which have been used this way informally, but responsibly, for years.

Our position was reached with careful consideration, given that we are an advocate for dogs (and off-leash play) and local wildlife. While PHS/SPCA is a private, independent non-profit best known for sheltering San Mateo County's stray or unwanted domestic animals and finding new homes, we also provide wildlife rehabilitation for sick, injured and orphaned animals from San Francisco through Santa Clara County.

Our professional wildlife rehabilitation staff completed a review/analysis of the site and the proposal, and we believe that there is no observable reason related to the protection of native wildlife which would justify denying access to off-leash dogs in the area. If there was impact on wildlife, it happened long ago. Wildlife continuing to use this area are most likely well versed in people, bikes, and dogs and probably avoid the area during the day. The overall area is very large and wildlife have adequate space to avoid people and dogs.

We should add that we are San Mateo County's contracted provider of animal control work which includes enforcement of the leash law and response to dog bites and attacks. We cannot recall receiving complaints about off-leash dogs or dogs acting aggressively in these areas, which indicates dog owners are being responsible and that the larger area has supported multiple uses peacefully for years.

Please reconsider your plan to ban dogs and off-leash dog play from the small areas of Rancho Corral de Tierra which have informally allowed this use for years with no negative impacts.

Sincerely, Ken White, President Peninsula Humane Society & SPCA 12 Airport Blvd. San Mateo, CA 94401

Correspondence ID: 1768 **Project:** 11759 **Document:** 38106
Received: Feb,10,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent,

Stop, look and listen. Stop the current mindset of prohibiting off and on

leash dog activity, particularly at Ocean Beach. There is no precedent for it. Look, at the reality of the current race to limit dog activity, a million dollars to enforce the ban, police should be used to diminish serious criminal activity not harass law abiding citizens. What's next no people on the beaches? Listen, these are slated for limitations are urban recreational sites not wilderness locations. We are city people who already live with many limitations, we don't need more. Lets revisit the proposed plan. Make reasonable compromises. There's plenty of room for all, animals (dogs) included.

Sincerely; Greg Fischer SF CA 94116

Correspondence ID: 1769 **Project:** 11759 **Document:** 38106

Received: Feb,16,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Sir:

Please allow dog owners to continue to responsibly use Crissy Field as a place to walk, play, and exercise dogs.

I believe owners are sensitive to GGNRA's need to protect the environmental integrity of Crissy Field.

Any consideration for a National Park Service waiver would be appreciated.

Sincerely, Gary V. Whalen

Correspondence ID: 1770 **Project:** 11759 **Document:** 38106

Received: Mar,01,2011 00:00:00

Correspondence Type: Letter

Correspondence: I have walked my dog off-leash at Fort Funston for a decade. Here are my concerns regarding the proposed dog management plan.

The plan is very ambitious in its attempt to accommodate birds, plants, hang-gliders, horses and dogs. Although the plan tries to give all of these aspects equal consideration, it is the dog people who use the area, fill the parking lot, and otherwise enjoy the Fort from the time it opens until the minute it closes. Fort Funston was placed under the purview of the GGNRA with the condition that it be maintained for the enjoyment of dogs and horses. The GGNRA has a legal obligation to honor this condition or return

the land to the city.

In this time of budgetary deficits, where will the money come from to implement any plan? As a taxpayer I object to my tax dollars being used to fund futile efforts. The enforcement costs of getting people to leash their dogs in certain areas would exceed any revenue collected from fines. A budget analysis of the proposed dog management plan would show the folly of trying to enforce restrictions on a waste land. Why are we arguing over a spit of land that buries or topples new fences within weeks? Mother Nature will undo any plan put in place.

Accommodations can be made to preserve the small patches of native plants and nesting areas. If dog owners have adequate areas for off-leash activities at Fort. Funston, they will be more respectful of the restricted areas. They will even self-police uninformed dog walkers who enter restricted areas, with the understanding that we can all lose our privileges if a few dogs are allowed in the habitat areas. In regard to hang-gliders, they are at the Fort only on certain days and times when the conditions are right. Moveable "Keep Out signs can restrict that area from dogs only when the hang-gliders are present.

In the decade it has taken to develop the dog management plan, it has become obsolete. This is due to deteriorating conditions at Fort Funston and the lack of funding. The easiest and cheapest solution is to do little, if anything, at the Fort. Yes, do what is practical to maintain the habitat areas, with the understanding that time and erosion will win in a few short decades. The highest and best use for most of Fort Funston is to leave it as it is for the enjoyment of the hundreds of dog people who use it every day.

Sincerely,

Connie Vickroy San Francisco, CA 94127

Correspondence ID: 1771 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 00:00:00
Correspondence Type: Letter
Correspondence: February 12, 2011 Mr. Frank Dean Superintendent, GGNRA Fort Mason, Bldg 201 San Francisco, CA 94123

Attn: Dog Management Plan Dear

Mr. Dean:

I am the owner of two small dogs. I have had the pleasure of taking them for

walks at Crissy Field and the adjacent area for the past twelve years. While I usually take them by myself, I sometimes have friends or family join me. Everyone has a great time (especially the pooches!).

I am careful to keep the dogs on their leashes when in the parking lot and until we have crossed the bridge. At that point, they are safe from automobiles. In addition, fencing and the beach itself provide boundaries within which they can run freely.

My dogs do not interfere with walkers, joggers or bicyclists. Whether on the beach or on the main path, they stick to themselves, much too interested in all the good smells around them. I am careful to pick up after them, so that the area remains pleasant for everyone using the area after us. I am greeted every day by people who recognize my two dogs, as well as by new people who make favorable comments about them.

This daily routine is healthy for me and is clearly the highlight of the day for my dogs. Being off-leash is far superior to being walked on-leash, because I cannot keep up with them when they run, which they love to do. Please note: they come when I call (it's the goodies), so I am able to keep them under control at all times.

We do not have a comparable place to walk safely off-leash. Joggers and bicyclists, on the other hand, have many other areas to go. Please preserve this very small part of the GGNRA for off-leash activities, as was intended when GGNRA was established.

Respectfully submitted,

Alan P Zimmerman

Correspondence ID: 1772 **Project:** 11759 **Document:** 38106
Received: Feb,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: GGNRA

RE: Dog Management Plan

Frank Dean, Superintendent,

All dogs should be on leash in all areas of GGNRA except in fully enclosed off-leash spaces. Always there are some owners who do not maintain voice-control and never will.

Thank you,

Maggie McElroy

Correspondence ID: 1773 **Project:** 11759 **Document:** 38106

Received:

Apr,01,2011 12:41:46

Correspondence Type: Web Form

Correspondence:

I live in San Francisco because it's a city that is open to caring about world affairs and the environment. I am always surprised at how little some dog-owners care about what is left of our precious natural environment. This is even more true on Ocean Beach. I've seen the following: - Dog defecating on the beach and their owners kicking sand to cover it (instead of picking it up) - Dog owners encouraging their dogs to chasing after the protected snowy plovers. - Dog owners allowing their dogs to run without a leash in areas they shouldn't. - Dog owners encouraging their dogs to poop in their neighbors yard without picking after their dogs.

I have 2 small kids. I would love for them to play on Ocean Beach freely - without worrying about digging up dog poop while playing in the sand. I would like them to chase the waves without worrying they will be knocked over by big dogs running around. I would also like them to know what snowy plovers look like.

It is embarrassing that we should be asking other countries to not cut down their rain forests where we can't even protect the animals we said we would. It is embarrassing that we should be up on arms over taking bald eagles off the endangered lists - so long as it doesn't inconvenient our little pets.

I strongly support the GGNRA plan to protect our environment from devastation from dogs and their owners. I would also like to encourage that we enforce the laws once we have them in place. It is always disturbing how many times we have to yell at people for allowing their dogs off-leashed in non-off-leashed areas. It's an extremely unpleasant thing to have to do.

Just because we are not a part of a group like the "dog groups", doesn't mean we don't care about our parks and city. We are extremely frustrated by this problem.

Thanks for listening. I hope you have the courage to do what's right for our future. Josephine Chew

Correspondence ID: 1774 **Project:** 11759 **Document:** 38106

Received:

Feb,15,2011 00:00:00

Correspondence Type: Letter
Correspondence: February 13, 2011

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

RE: Comments to the Dog Management Plan/Draft Environmental Impact Statement

Dear Mr. Dean:

These comments are in regards to the Dog Management Plan/Draft Environmental Impact Statement as applicable to GGNRA in San Francisco.

I live near Baker Beach, China Beach, Ocean Beach and Lands' End and I walk there often, without a dog. From my observations at the beaches, the use of Baker Beach by people without dogs probably has more impact on the beach than use by people with dogs on leash or under voice control. Fort Baker Beach, I suggest that you reconsider "the 1979 pet policy" as the Preferred Alternative for Baker Beach. Eliminating a Regulated Off-Leash Dog Area at Baker Beach would have the effect of limiting Regulated Off-Leash Dog Areas in San Francisco to Crissy Field, Ocean Beach, and Fort Funston. These three areas could then have increased density of people with dogs, and that could result in increased environmental degradation at these three areas due to overuse. Fort Funston is currently environmentally degraded and in need of environmental protection and restoration. The proposed Regulated Off-Leash Dog Area at Crissy Field is problematic due to its adjacency to a wildlife protection area. The proposed Regulated Off-Leash Dog Area at Ocean Beach is problematic due to its adjacency to a western snowy plover area. The north beach area of Baker Beach is an open strand bordered by a cliff and less prone to conflicting land use adjacencies or degradation from use by people with dogs. Continuing the use of "the 1979 pet policy" at Baker Beach could result in less cumulative impact to the GGNRA in San Francisco.

If you cannot reconsider "the 1979 pet policy" as the Preferred Alternate for Baker Beach, then "Alternative E" for Baker Beach should be chosen.

I appreciate the 90-day public comment period and trust the National Park Service will make the best decisions for the management of this unique urban recreation area.

Correspondence ID: 1775 **Project:** 11759 **Document:** 38106
Received: Feb,17,2011 00:00:00

Correspondence Letter
Type:
Correspondence: February 15th 2011

To whom it may concern,

I would like to register my request to keep the 5 areas where dogs are allowed to be under voice control and or on leash free as they are now.

I walk every day and have never encountered any fights among dogs, the owners pick up litter in the provided receptacles to take it away.

There is plenty of space and room for many activities.. bike riding, jogging, baby strollers, and dogs. It works extremely well. Why change something that is working. The cost of the law enforcement will be significant and create a very hostile environment with the dog owners toward our National Parks. Who knows, maybe next you will ask for children to be on leash as well. Don't go there, please.

Thanks, Ann Hatch, Native San Franciscan. tax payer and dog owner

Correspondence 1776 **Project:** 11759 **Document:** 38106
ID:
Received: Feb,23,2011 00:00:00
Correspondence Letter
Type:
Correspondence: Kimberly McNutt San Bruno, CA 94066

GGNRA Frank Dean, Superintendent Fort Mason, Bldg 201 San Francisco, CA 94123-1307

RE: GGNRA PROPOSED BAN ON OFF-LEASH RECREATION

February 21, 2011

Dear Superintendent Dean:

I regularly walk my dog at Fort Funston Recreational Center located in San Francisco. After a long difficult day at work, the exercise and ability to bond with my dog relieves my stress. It also keeps me healthy since walking my dog every day for at least 40 minutes is my regular exercise routine. My dog is very energetic and athletic and he also benefits because he gets the off-leash exercise he requires to reduce his anxiety and stress levels.

Unfortunately, dog parks can be crowded and small and don't have enough open space for many dogs to get maximum exercise. Also, the smaller space

in a dog park doesn't allow for enough space to escape from unsocialized dogs that unfortunately frequent dog parks. Overcrowding of dog parks will occur if the National Parks have off-leash restrictions ultimately causing more potential, unwelcome situations arising from unsocialized and possibly aggressive dogs. The safety of dogs and dog owners will be compromised along with losing the long-term health benefits of stress relief and exercise for dogs and dog owners.

My dog and I both have a better quality of life by being able to walk freely at Fort Funston Recreational Center. If the leash laws are enacted, our quality of life would be greatly reduced.

Sincerely,

Kimberly McNutt

Correspondence ID: 1777 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: To: Frank Dean, Gen. Sup't. GGNRA

From: Charles Starbuck San Francisco, CA 94109

Re: Dog Management Plan

Main Comment: I fully endorse and support the Preferred Alternative selected for the areas included in the plan/DEIS.

Reason: I have been involved, as a park volunteer, in habitat restoration projects in most of the areas addressed by the plan/DEIS. I have observed, on many occasions, clearly inappropriate dog behavior (off-leash) resulting in negative impacts to sensitive resources. I further believe that a clear and enforceable policy on dog use is urgently needed to bring together parties on both sides of the issue.

Sincerely,

Charles Starbuck

Correspondence ID: 1778 **Project:** 11759 **Document:** 38106
Received: Mar,01,2011 00:00:00
Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

On of our loved experiences in San Francisco is to walk with children and dogs at Chrissy Field. It is breathtaking to watch the freedom and happiness of them running freely with the beautiful backdrop of the Golden Gate bridge, the Marin higlands and our Bay --

It is important to preserve the open space. It is vital to the mental health of our compressed society.

Sincerely yours,

Dr. + Mrs Edward Rubenstein

Correspondence ID: 1779 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 13:10:21

Correspondence Type: Web Form

Correspondence: My family supports maintaining off-leash and voice-control for dogs at Fort Funston. Our reason is simple: it is the only off-leash area where we do not have to worry about cars or cyclists. Fort Funston is a beautiful location and we support all efforts to keep it that way. We understand the reasons for changes proposed in the GGNRA Draft Dog Management Plan / Environmental Impact Statement. We do think that the cure is worse than the complaint, in this case.

We urge that Fort Funston be maintained as an off-leash/voice-control area for dogs.

Thank you

Correspondence ID: 1780 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 13:10:43

Correspondence Type: Web Form

Correspondence: I feel that dog walkers should be free to take their pets to Crissy Field, Ocean Beach and Fort Funston. I use those areas frequently and never notice any problems with other dogs or dogs bothering people. there are now so many people who enjoy walking their dogs and it is good exercise for people and pets. don't let a few of the non dog lovers ruin it for everyone else. Maybe you could limit off leash areas at Fort Mason, Fort Point and other really touristy areas. But let the residents enjoy their city!!

Correspondence ID: 1781 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,01,2011 14:45:01

Correspondence Type: Web Form

Type:

Correspondence: GGNRA, I'm concerned with the proposed dog restrictions. I've been a resident of the former officer housing in Fort Mason for the past 4 years and I often visit the Fort Mason park as well as Chrissy Fields. I feel that any restrictive action against dogs in these areas would be very detrimental to the community. I've been a volunteer at the San Francisco SPCA for the past year visiting the dogs on medical quarantine and getting them outdoors for human interaction and exercise. In the executive summary of the proposed restrictions it is mentioned that worker and public safety is one of the primary concerns which is inciting the restrictions. I can tell you first-hand that dogs primarily become reactive and aggressive because of a lack of socialization with humans and other dogs. By preventing off-leash socialization you will be worsening the very problem you're attempting to correct, in effect hurting public safety. It is absolutely essential that dog owners are able to congregate to let their dogs exercise and play so they do not become reactive and aggressive. If we close the national parks in the city to these activities, where will the dog owners go? There are other parks but these restrictions will increase the number of dogs at those parks and create overcrowding which will result in dogs not getting outdoors as often which means the dogs in the community will be less socialized and therefore more reactive and aggressive. As a resident, an individual who frequents the parks and a regular financial donor to the GGNRA, I do not think these restrictions will be beneficial to the parks or the community. I urge you to also consider the comments submitted by the San Francisco SPCA and other knowledgeable dog groups in the community.

Kind Regards, Ed Meier

Correspondence ID: 1782 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,01,2011 14:48:10

Correspondence Type: Web Form

Type:

Correspondence: The Preferred Alternative is not acceptable. It is overly restrictive, and its restrictions are not justified by the totality of available data. It is based on separation and exclusion, a management philosophy that goes against the values of the Bay Area. It violates the mandate for the " maintenance of needed recreational open space" contained in the legislation that created the GGNRA. The DEIS is full of negative things that "might" or "could" happen if dogs are allowed off-leash at various sites. But there is very little evidence presented that these hypothetical impacts actually happen. Given the intense scrutiny of dogs by the GGNRA over the past decade and more, the fact that there is not more persuasive real data about significant impacts of off-leash

dogs means that there is no real justification for the proposed restrictions contained in the Preferred Alternative. The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with dogs, and could lead to an increase in conflict as more and more people are forced into smaller and smaller areas. The impacts of people moving from the GGNRA into city parks is not adequately addressed in the DEIS.

Correspondence ID: 1783 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 14:54:25

Correspondence Type: Web Form

Correspondence: Today at Ocean beach in San Francisco (between Pacheco and Sloat Boulevard in the Sunset Diestric) I sadly watched unleashed dogs chasing birds. Though this is a particular problem for the Snowy Plovers who over-winter at Ocean Beach, I feel it must be stressful for all the birds who are chased by dogs that are unleashed by their owners. I am glad the GGNRA is working so hard to correct this problem and protect wildlife from thoughtless dog owners.

Correspondence ID: 1784 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 15:32:14

Correspondence Type: Web Form

Correspondence: I am writing to SUPPORT walking dogs off-leash in GGNRA. I understand there are occasional problems, but I think many, if not all, of them can be mitigated through slightly revised regulations.

I treasure the parks where I walk my dog off-leash (primarily Crissey Field and Rodeo Beach) and I don't think the areas where off-leash dog walking is allowed should be further restricted.

I have a few thoughts on what regulations could be added that might be a workable compromise for dog owners and help non-dog owners not feel intruded upon in the parks:

1. MOST IMPORTANTLY, create an online, off-leash dog behavior guide and then issue special tags to dogs that meet pre-determined good canine citizenship. Dogs WEARING these tags would then be able to be walked off-leash in GGNRA. This program would be on the honor system, require a fee, and more importantly a commitment on the owner's behalf to properly train their dogs. A program like this was implemented successfully in Boulder Colorado Mountain Parks and so I know it can be done. Dogs must come when called, not approach other people or dogs without permission,

not leave the trail without permission, and not chase wildlife. This is all easily accomplished with well-trained dogs. Dogs not wearing these "off-leash" tags would be fined. Yes, a part of the success of this type of program is creating a barrier to entry to off-leash dog walking ? much like any other type of license or fee. 2. Restrict off-leash dog walking in high-traffic parts of GGNRA to certain hours of the day and / or days of the week. Perhaps certain parts of the these most-congested areas could be off-leash until 9:00 am and then again after 5:00 pm? I wouldn't impose even my well-behaved off-leash dog to families having a picnic on a hot sunny day on Crissey Field. 3. Restrict off-leash dog walking to three dogs maximum. This limit should include ALL owners AND professional do-walkers. 4. License all professional dog walkers. 5. Increase enforcement and write tickets for owners that do not follow the rules. Use this money to increase awareness of responsible dog management in the parks.

Thank you for taking these comments into consideration.

Sincerely,

Brett Moyer

Correspondence ID: 1785 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 15:41:13
Correspondence Type: Web Form
Correspondence: NPS Director Jon Jarvis's support of "Healthy Parks Healthy People" (<http://www.nps.gov/goga/parknews/2011-0330.htm>) is good.

What NPS and Jon Jarvis are not understanding is: People with dogs will get less exercise (i.e., will be less healthy) with every reduction in their dog's accessibility to open spaces such as GGNRA.

Here's why. Many non-dog don't understand that: 1) Dog owners will not leave their dogs cooped up at home while the owner goes out and exercise. Dog owners love their dogs like their own children. They will do whatever their dogs are allowed to do. 2) Dog "exercise" is not just physical. The outdoors socialization is critical to mentally healthy and socially amenable dogs. 3) On-leash dog interaction is NOT healthy dog socialization. When dogs are physically restrained, they are forced into complex social posturing...just as humans would be if we were in the same situation. 4) On-leash exercise alone is not sufficient for dogs. Owners cannot keep up with dogs that need to be off-leash.

A large percentage of Bay Area households (~33%) own dogs. If you truly want healthy people, then NPS must support in fact encourage more off-

leash dog areas.

Correspondence ID: 1786 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 16:36:07
Correspondence Type: Web Form
Correspondence: You can have a dog policy that works. There will be a learning curve for irresponsible dog owners, but after a couple tickets they can be trained. I find it unfair that there is always accomadation made for horses, and dogs are excluded. Dogs can be on leash and still enjoy the parks.

Correspondence ID: 1787 **Project:** 11759 **Document:** 38106
Received: Apr,01,2011 17:17:18
Correspondence Type: Web Form
Correspondence: My comments will be specifically in regards to the Mori Point. This is where I live, and this is where I walk my dog. Should I decide to dog-walk in other areas, I would abide by the rules, and if I didn't like those rules, I would dog-walk elsewhere.

I support on-leash dog-walking generally, and I always keep my dog on a leash when she isn't fenced in at home or at a dog park. I feel that many people who claim their dog is under "voice control" merely have a dog that will come when called most of the time. To me, true voice control is reserved for professional dogs, such as police canine units, and obedience champions. I worry that most off-leash dogs will ignore their owners in a stressful situation, where voice control would be most needed. Examples could be: Encounters with a wild animal, two intact males who suddenly decide to fight over a nearby female, or a dog who misreads the actions of child as that of a puppy who needs discipline. In any of these situations, I think even well-trained dogs might ignore their training.

Now, to Mori Point. As a resident of Fairway Park West, (which is surrounded in part by GGNRA) I appreciate what a rare location we have. The many trails within an easy walk, have long been a selling point for our homes. Imagine my shock, when I learned that I might be barred from walking my dog down Polliwog Path, a trail that backs up to a row of homes, many with dogs. How could my dog on a leash be a greater threat to the area than that of a dog inside a fence, just inches away? Truthfully, I feel that my dog poses less danger. I know where she is at all times on the trail. The dogs in the backyards might break, dig under or jump their fences, and be loose for hours while their owners are at work.

I was also dismayed to read that certain other trails and areas at Mori Point

could be designated dog-free. I began to think of how it could negatively impact the value of my property! Every time a home in our neighborhood comes up for sale, the description mentions the nearness of the GGNRA. Of course, that is a GGNRA without dog restriction.

I know that one goal of the Dog Plan is to reduce confusion. It is my opinion that allowing dogs on some parts of Mori Point, but not others, will only add to the confusion. My solution is this: Walk a dog on Mori Point? Leash it! That's the only rule you need. Well, that and the pooper-scooper rule...but often I find less dog waste on the trail than I do on the front lawn of my home. The Mori Point dog-walkers are a considerate group, and deserve full access. I support full access to leashed dogs on all other areas of GGNRA as well.

Correspondence ID: 1788 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 18:11:44

Correspondence Type: Web Form

Correspondence:

What is the standard Law Enforcement or Park Operations staff will use to determine whether an off-leash dog is "Under Voice Control"? What will be the alternative(s) for a dog that does not meet the minimum standard?

A clear, easily understood standard of what is required to demonstrate that an off-leash dog is under control is necessary to mitigate the possible impacts of off-leash dogs under any of the proposed alternatives evaluated by this report.

I have a large dog that I walk on-leash in many of the parks. He is always on-leash because he sometimes does not respond immediately to my commands and is therefore, not always under my voice control. Often, off-leash dogs will approach me and my dog where there is no owner in sight. I also see people with leashes in their hands and no dog in sight. When I ask a dog walker to please keep a dog under control and not let him approach my dog I notice a wide array of responses by dogs to commands given by a dog walker. My dog, while not aggressive, isn't a particularly social animal, so I always try to manage his contacts with other dogs in parks. But I find it difficult when a walker is not able to control a dog and prevent it from approaching me and my dog despite my request. This, unfortunately, has led to a few unpleasant encounters that could have been avoided if off-leash dogs were under better control or required to be on-leash.

Correspondence ID: 1789 **Project:** 11759 **Document:** 38106

Received: Apr,01,2011 20:06:11

Correspondence Type: Web Form

Type:

Correspondence: I urge you to leave the 1979 Pet Policy in place. The report does not document the need to change a policy that was put into place that allowed the NPS to administer these lands. The GGNRA is different from most national parks, and hence a dog policy at GGNRA that is different from the rest of the properties in the NPS system is appropriate. The data provided from 2007 and 2008 show very few incidents of misbehavior, such as biting or harassing wildlife, by off leash dogs. The 1979 policy is working, and does not need to be changed.

Correspondence ID: 1790 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,02,2011 01:00:35

Correspondence Type: Web Form

Type:

Correspondence: Having designated off leash areas for dogs is a very important need for the city of San Francisco. Living in a city environment, we need an area to take our dogs to release some energy. We are responsible dog owners who simply want to take our beloved friends out and enjoy public spaces. By restricting access to Golden Gate National Recreation Areas, we will be overwhelming other local parks that allow off leash access. Additionally, Golden Gate National Recreational Areas offer some of the safest places for us dog owners to bring our pets. Most local parks are too close in proximity to road traffic. Though the GGNRA may be designated as national parks, for those of us who live in the area, these are our local parks, and it is unfair to limit our enjoyment of them. I do not believe that restricting dog access will have a noticeable affect. The majority of us who enjoy the use of this area with our dogs are quite responsible in avoiding their impact on surrounding wildlife and picking up after them. Restricting use will not have an affect on the irresponsible pet owners who do not do the same. It will only generate more of them. I vote option A.

Correspondence ID: 1791 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,02,2011 01:27:55

Correspondence Type: Web Form

Type:

Correspondence: To Frank Dean GGNP General Superintendant.

Unfortunately I am unable to open the individual park documents. However my interest of concern is maintaining as much as possible if not entirely dog free Golden Gate National Parks. A exception being Fort Funston due to it's past practice designation.

I am a 40YR resident of Pacifica. I participated for many years on a GGNRA sub-committee attending many GGNRA Commission meetings at

Fort Mason. Additionally I was a participant on the Pacifica/GGNRA Advisory Committee for nearly four years as a Pacifica Planning Commission Liaison.

Currently my support for our Bay Area National Parks is expressed through my many years as a Conservancy Park Steward, Trail Keeper and conservator member.

In the end.....protecting natural resources, fauna and flora is of critical importance. The many years and many volunteers, staff, interns and students engaged in habitat restoration and enhancement of our National Parks provides thriving conditions for the bay-areas native bio-diversity. AS you know, the experience of wildlife for park visitors of all ages is a primary recreational experience. Not to mention that the health of the planet is determined by a thriving bio-diversity.

My familiarity as a volunteer and visitor of Mori Point, Milagra Ridge and Sweeney Ridge of the San Mateo County Parklands, prompts me to discourage any dog activity that would ultimately threaten these sensitive wildlife sanctuaries. In my opinion the benefit of any doubt regarding this canine conundrum should go to wildlife.

I recently attended a Pacifica/GGNRA Advisory Committee meeting to question their recommendation for allowing dogs on Mori Point's historically named Timigtac Trail. The history of the Ohlone Timigtac name that comes from the Timigtac people and village site just below the trail was not discussed prior to the recommendation. Nor was the coastal prairie, scrub flora and fauna adjacent to either side of the trail. The grassland adjacent to the south of the trail is habitat for Cal. brown racer snakes, gopher snakes, alligator lizards, voles, meadowlarks, a raptor roosting tree, seasonal barn/cliff swallows and a variety of invertebrates. Adjacent to north side of the trail is coastal scrub, habitat for various birds including Cal. Thrashers a species of concern, invertebrates and bush rabbits..... a favorite of dogs. The Timigtac Trail is also a favorite route for coyote's.

The inspiration for naming several trails at Mori Point was the result of a trail naming project sub-committee working out of the Pacifica/GGNRA Advisory Committee. Much effort went into researching unique and historically appropriate names for trails. The participants of the sub-committee should have been noticed about the dog trail discussions.

Consequently, as noted above, the Advisory Committee's discussion about dog walking on the Timigtac Trail was ill-advised and insensitive.

Dog walking should not be allowed on the Mori Point Timigtac Trail.

Lastly, the Pacifica Quarrylands adjacent to Mori Point is the un-official dog park of Pacifica. The majority of people that walk their dogs there, do so off-leash. Unfortunately these off-leash people with their code violation modality quite often spill into/onto Mori Point!

Respectfully

Ron Maykel Pacifica, Ca. 94044

Correspondence ID: 1792 **Project:** 11759 **Document:** 38106

Received: Apr,02,2011 13:26:58

Correspondence Type: Web Form

Correspondence: I strongly urge you to:

1) adopt the use of Map 5A, in order to allow continued off-leash beach access for dogs;

2) adopt the use of Map 7A, which maintains the dog-friendly Coastal Fire Road & Trail adjacent to Muir Beach;

3) place a dog litter bag dispenser and waste receptacle at the footbridge entrance to the area;

4) increase signage and education efforts so that visitors are aware of the rules;

5) keep Muir Beach dog-friendly - the dogs deserve it!

Thank you for your consideration.

Correspondence ID: 1793 **Project:** 11759 **Document:** 38106

Received: Apr,02,2011 20:02:54

Correspondence Type: Web Form

Correspondence: I am very upset to hear that dogs may be outlawed at yet another great beach and hiking area. It just means that instead of using the trails in Marin County, I will be driving great distances each Sat. and Sun. to find hiking trails and beaches to enjoy with my dog. As an avid hiker and beach lover, I wouldn't think of going without my little dog.

My dog is well-trained and I always pick up after him and dispose of the bag in a receptacle. I never leave the bag along the trail.

As it is, the only places for dog-lovers to go are in MMWD, Muir Beach, Rodeo Beach, and the northern part of Stinson Beach. They're not enough, but please don't take those beaches away!!

Correspondence ID: 1794 **Project:** 11759 **Document:** 38106
Received: Apr,02,2011 20:34:54
Correspondence Type: Web Form
Correspondence: Dogs, both on leash and especially off leash, have negative impacts on birds and other wildlife. Off leash dogs can inhibit visitors from feeling comfortable and enjoying areas of the GGNRA, particularly the beach at Crissy Field, all of Fort Funston and most of Ocean Beach. Fort Funston is so totally overrun by dogs that it can no longer be enjoyed for hiking and bird watching. In the GGNRA dogs should always be on leash. Compliance needs to be strictly enforced, 100%. Commercial dog walking should not be allowed in the GGNRA. Habitat and wildlife preservation should always be the priority for the GGNRA. Greater restrictions on dogs are overdue and badly needed.

Correspondence ID: 1795 **Project:** 11759 **Document:** 38106
Received: Apr,03,2011 09:13:50
Correspondence Type: Web Form
Correspondence: Dear NPS,

I fully and strongly support all aspects of the plan pertaining to Ft. Mason, Crissy Field, and the Presidio beaches. As Yogi Berra once said, "you can see a lot just by looking around". And what I see are various forms of irresponsible dog ownership: off-leash dogs behind their owners, who therefore can't possibly see what their dogs are doing; multiple off-leash dogs going off in different directions, so their owners can't possibly keep track of all of them; owners on the phone with their dog so far ahead of them it is unlikely they can see; etc.

I am not anti-dog. But I do not ever want to be approached by an unfamiliar animal off-leash. By enforcing leash laws and limiting access, a welcome secondary benefit should be less dog excrement everywhere. Most dog owners do tend to pick up what they actually see.

While the majority of dog owners are probably responsible, we have laws to protect us from the small minority of people who are criminals, not from our law-abiding fellow citizens. Similarly, it is appropriate to have rules to protect us from irresponsible dog owners, who may be a smallish minority

but are nonetheless significant in actual number.

I use the parks less, and don't go to the beach at all, because of irresponsible dog owners. I'd like for that to change. Thank you for your thoughtful, well-thought plan that fairly balances between dogs and people, while properly prioritizing people.

Very Truly Yours, Steven C. Seidman

Correspondence ID: 1796 **Project:** 11759 **Document:** 38106

Received: Apr,03,2011 15:28:20

Correspondence Type: Web Form

Correspondence: I have lived near Fort Mason for over 20 years, and on weekends go running in Crissy Field. I have two major concerns with dogs.

a) Off leash must be restricted to specific areas. I have seen dogs inside the protected fencing of Crissy Field, had a dog eat my son's frisbee, and numerous times when running have collided with dogs.

b) Leashes must be restricted in length.

Thank you for your work.

Correspondence ID: 1797 **Project:** 11759 **Document:** 38106

Received: Apr,03,2011 20:32:46

Correspondence Type: Web Form

Correspondence: May I ask that you keep all areas of the GGNRA which are currently open to off-leash dog walking, open to that usage.

I am a senior citizen. Walking with my dog in my own neighborhood is my primary exercise, and my dog needs off-leash running and socializing (as that is her natural way of moving and connecting with others).

These areas were given to the GGNRA with the understanding that traditional usages would be preserved. Those usages are of course different than those at say, Yellowstone. Attempting to recreate a dogless environment in an area in which dogs have run for years would be a violation of that agreement.

Thank you,

Birrell Walsh

Correspondence ID: 1798 **Project:** 11759 **Document:** 38106

Received: Apr,03,2011 21:38:12

Correspondence Type: Web Form

Correspondence: I do not support this plan. It will have no benefit to the city of San Francisco. Denying ideal space for dog recreation will do nothing positive for the occupants, both human and animal, that reside in our city. Please consider a plan that supports wildlife as well as the domesticated animals of this city.

Correspondence ID: 1799 **Project:** 11759 **Document:** 38106

Received: Feb,25,2011 00:00:00

Correspondence Type: Letter

Correspondence: The Honorable Lynn Woolsey Member of Congress, California 6th District
2263 Rayburn Building Washington, DC 20515

Dear Ms. Woolsey,

Re: Golden Gate National Recreation Area

You may remember when the late great Phil Burton, against all odds, passed legislation in 1972 establishing the GGNRA. The reference is Public Law 92-589 paragraph 1, October 27, 1972. Reference is made throughout this legislation that the main purpose of the GGNRA was to be recreation and education. A large part of the real estate was handed over by the City and County of San Francisco, under agreement that use was to remain mostly recreational'the beaches, after all, had been theirs.

Now The National Park Service, whose affairs are administered by the same division of the Department of the Interior as Fish and Wildlife, is proposing two probably related actions, (1) a Draft Environmental Impact Statement (DEIS) regarding re- regulation or banishment of dogs on most of the areas where voice-controlled animals are now permitted; and (2) renaming GGNRA to Golden Gate National Parks.

The latter of these two proposals was advanced in 2008 by none other than Nancy Pelosi, who was and remains a Congressional leader. Nonetheless, the proposal did not even get out of committee. One can hardly imagine how this had her support, but we all make mistakes. It is a suspiciously bureaucratic idea, particularly when seen in conjunction with various anti-dog remarks made by officials of the NPS, including the then head of it, Jon Jarvis. It is my very sincere hope that you and your staff will review any

proposals to rename the GGNRA, so as to honor the provisions of the enabling legislation, the agreement with the citizens of San Francisco, and the memory of Phil Burton.

As to the DEIS about dog walking, we hope someone on your staff will take a look at this document. It is two volumes, two thousand one hundred eighty-eight pages long, so please don't print it out. Permit me to say here that my main interest in this subject matter is dog-walking at Muir Beach, right here in your district. My wife and I are empty-nesters, aged 71 and 76 respectively, with a rescue dog who has been walking with us at Muir Beach, off-leash but under voice control, without incident, at least four times a week for the four years that he has been our companion. We live only four miles from the beach, and there are only one or two places to walk Robbie that are not in the GGNRA and also do not require miles of highway driving to access. The same can be said of the DEIS proposals to ban dogs on the Oak Valley trail, at Crissy Field, and others.

Ms. Woolsey, thanks for your years of service for us, especially as co-leader of the Progressive Caucus. We have voted for you in every Congressional election since 1992. We understand that you're thinking of retiring, but although you certainly deserve it, we sincerely hope you don't.

Very sincerely,

Wentworth Foster

Cc: Frank Dean, General Superintendent, Golden Gate National Recreation Area

Correspondence ID: 1800 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: To - Mr. Frank Dean, Superintendent Golden Gate National Recreation Service From ' Jo Kennedy, SF, CA 94123 Subject - Dog Rules

I've been a Cow Hollow resident and dog owner for 54 years and remember when there was a fence prohibiting access to east beach except at low tide. I do believe that everyone should be able to enjoy all the beaches and, certainly, with the number of dogs and dog walkers there should be sensible restrictions ' not a one rule fits all approach. This applies also to Ocean Beach but I know the Crissy Field beaches the best and first I'd like to take issue and question the wide berth of the excuse that you use, that is,

the dogs "harm the environment: To use "The Enviornment is being

harmed" is a questionable stretch when it refers to most sandy areas and particularly the East Beach along to the West Beach because one can legitimately ask what sensitive environment? Sand is indestructible and green growth is almost non-existent, particularly at Ocean Beach. There is some growth, sand, birds and marine animals but I would argue that the damage, if any, is minimal ' as questioned below.

a.. Most of the growth, except for a few old, wonderful wind-swept trees, was man-planted by the GGNRA all along the wide pedestrian/bike path and the northern-side plantings were promptly ruined by the tides which often sweep over the wide path and leave big puddles. This damage was not done by the dogs nor people, so, please, explain what damage the dogs do. HOWEVER, I do agree that dogs should be leashed on that path to protect walkers, families and cyclists. It is also correct that the already protected, fenced, gated, diagonal path that serves as a learning area that crosses from the main drive that parallels the northern line of the lagoon should be No Dogs.

b. The sand on the beaches is washed (or dirtied) twice a day and it is certainly true that a few dog owners give all of us a bad name when they don't pick up the shit ' but- they should be tagged so that others can enjoy the beach. The tides bring in a lot of debris that often has to be trucked away. What damage do the dogs do to the sand?

c. In the lifetime that I have spent at Crissy, I have seen very few dogs chase the birds and if they do their owners should be tagged because it is a danger to the other people on the beach. I have no patience with dogs unleashed that run wild. I have, however, never seen a dog catch a bird and when I had a dog that liked to swim I was afraid that a sea lion or shark might get her.

Some recommendations East Beach: Sat, Sun and holidays, allow dogs off leash at east beach until 10:00am then again at 4:00 and tag anyone who doesn't comply but make sure the signs are many and visible. San Diego apparently does this. Off-leash OK during the week when there are many fewer people unless we have a heat wave when there should be some restrictions so little ones aren't beset by dogs. BUT, there are so few of these days it shouldn't be a problem but should be included in signage. East Beach is the only place with easy parking so we neighbors meet and feel we live in a real neighborhood. It is also the point from which so many people begin their hike to the Warming Hut.

Middle Beach ' the area between both East and West beaches, paralleling the lagoon where the few big trees grow and the GGNRA plantings have been devastated by the tides. This is a difficult area to reach for families and the old people who are out for their exercise since the only parking and entrance is at East Beach. Leashes required on lagoon bridge (part of on-leash path)

and then off-leash on the beach at all times, possibly as far as the old Coast Guard pier. It is the young with and without dogs that, for the most part, inhabit this area.

West Beach and the original raised Crissy Field. The area at the beach and the raised area should have different rules: Off-leash on the raised area On-leash at the beach because it is so close to the newly expanded beach at the Coast Guard Station and just close enough to all the activity going on from there to the Hut. The problem for this whole area is the lack of parking, with the hangers now occupied and the Warming Hut so popular. For dog owners the iffyness of parking makes it a poor choice for most of us.

Most of us are responsible dog owners and what we have learned is that our dogs make us a stronger part of our neighborhood. Those of us who meet at the Lombard Gate, for example, have an e-mail list of "members" and we are ready to help each other as needed and celebrate each other's birthday despite being very young to very old. We understand that we must share our spaces but chafe at rules and words that don't make a lot of sense. There is no such thing as "a rule that its all" but there are "rules that should be adopted for each environment" which is what we hope that you will achieve.

Jo Kennedy

Correspondence ID: 1801 **Project:** 11759 **Document:** 38106
Received: Feb,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Bldg. 201 San Francisco, CA 94123

Dear Mr. Dean,

I am writing to comment on the plans put forward by the GGNRA which include the change of name and status of the Golden Gate National Recreation Area by dropping the word "recreation" and changing the area to a National Park. I would also like to comment on the dog mitigation proposal.

-The GGNRA was established in 1972, and evoked a great sense of relief for those who lived in or near the urban area of San Francisco and felt that the establishment of the GGNRA would halt further residential and commercial development of open areas that had always been used for recreation and outdoor experience. The new community of Marinello, which was in the advanced stages of planning at that time, is an example of what had been stopped. Some of the land set aside as the Golden Gate

National Recreation Area was acquired from the city of San Francisco, some from residents, and some from Federal and California state land. The plan was to protect this land from development and to keep it open for outdoor recreation and education for the residents of this urban area.

-In 2008 there was an attempt to change the GGNRA, as established by Phil Burton and other visionary members of Congress, to a National Park. Fortunately for the residents of this urban area, this attempt failed. Now, more than ever, the GGNRA is needed by urban and suburban residents of the San Francisco Bay area to protect areas for recreation, education and outdoor experiences.

-The Draft Environmental Impact Study (DEIS), the "dog mitigation" plan, is part of the current proposal by the GGNRA and is not in the best interests of those served by the GGNRA. The plan to ban dogs from Muir Beach, part of the Oak Valley trail, Crissy Field and other areas can only be seen in the context of changing the original Golden Gate Recreation Area to a National Park and make the administration of this area easier for you. Perhaps this entire dog issue is a "red herring" in a document that is over 2000 pages and unlikely to be read in full by very many of the constituents served by the GGNRA. It is not without note that dog owners see this issue as the most compelling, and it is an issue that will disappear if the area is turned into a National Park because, of course, dogs will be banned as they are at other National Parks.

-Much has been done to date to build and improve areas within the GGNRA for bikers. Nothing has been done for hikers who like to hike with their dogs. This is a large group within the GGNRA which has watched in dismay as more and more trails and areas are closed to dogs completely or to off-leash dogs. There are many dog owners within the GGNRA who see hiking as a huge health benefit for themselves as well as their dogs, and for whom the experience of hiking is their major recreation. These people cannot take their dogs hiking in National Parks, and to tell them to go to established dog parks is like telling them to go hiking at the mall. It is also like telling bikers to go round and round a track. It just isn't the same, as I am sure you know.

-The fact that you are only planning to have informational hearings about such a huge change in the nature of the GGNRA indicates that you don't welcome public input. Are you afraid that the people you serve won't like what you want to do? If so, perhaps you should reconsider.

Sincerely, Penelope Foster

cc: Lynn Woolsey, Member of Congress Jared Huffman, Member of California State Assembly

Correspondence ID: 1802 **Project:** 11759 **Document:** 38106

Received: Feb,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Frank Dean, GGNRA,

I am a 64 yr old retired native San Franciscan who owns her own house. 3 generations of my family have been walking our dogs at Fort Funston for 33 years. I want my next generation to enjoy it too. During these years 2 have seen many changes. The cliffs have eroded so much that many of the fort structures have fallen on to the beach, the swallows little nesting caves have all disappeared, and all those useless fences you put up are on the beach or dangling from the cliffs. This erosion is not due to dogs or people. It's due to Mother Nature. You have wasted our money on fences that are covered in sand or fallen over. Your rangers are never walking the paths. I go out there about 4 days a week for at least an hour or so, and only see rangers in SUV's. The paths are full of pot holes and sand is eroding away from under them. You have done nothing except put in some native plants that seem to be doing ok because we have respected them. Our dogs are not responsible for hunting birds or any animals. The only dead animals I have seen are on Skyline Blvd or on the beach. Don't think I don't like birds. I have a bird feeder in my backyard and many flowering plants that attract humming birds, bees, and butterflies. Even the famous parrots have come in my yard to feed off my junipers and pear tree. My dogs don't seem to be having any affect on them.

In your report you site resources being compromised, but all you site are value causes. The word "COULD" is used a lot. You don't prove anything. If you're concerned for our safety, put up a fence where people have gone over the cliff, or fill in the pot holes. How can you fear for the ranger's safety when they never leave their trucks? You also mention litigation. You are the ones being sued. In so far as dogs causing disease, I have never got a disease from my dogs and neither have the many people I know who have dogs. Dogs still deficate and urinate when on a leash! I feel safe at the Fort beacuse I have my dogs. Children want to pet them (especially when I walk my friend's chihuahua). The vast majority of people like my dogs and enjoy watching them play. A rare person who has a phobia may avoid my dogs. But there is plenty of room and miles and miles of beaches they can use. The more you crowd people and dogs the more problems you will have. The way it is now is perfect. No one I know has been bit. I heard of a few dog fights, but they are minimal for the number of dogs at Fort Funston. I've been out there thousands of days and its my most important recreation. It was my mothers only recreation. Small enclosed areas won't allow me and my dogs to exercise. I used to jog with my german shepard. You also mention NPS regulations. This is not Yosemite or Yellowstone. I believe

they can have loaded guns at those parks!

I was up there in 2001 when you tried to enforce your illegal rules on us. It was easy to avoid you. What makes you think you can enforce it now. You want one million dollars to do it. "Congratulation"! You can now waste more taxpayers money on giving yourselves some useless jobs.

I love Fort Funston, Lands End, and Crissy Field. I would donate money and time if you didn't own it. I have lots of money and time. The telephone survey on page 99 was statistically useless. 1700 calls is way too small and how do you know they even visit these places. There are more people on a sunny weekend at F.F. than you have talked to.

The changes I would like to see are a limit of 5-6 dogs per person because I don't believe you can control more than that many dogs. Permits for professional walkers is ok. Leash control in the parking lot is a good idea. I've almost hit dogs and had dogs jump on my car. Enforcement would be easy because rangers wouldn't have to leave the parking lot and it wouldn't cost 1 million dollars.

If your regulations were enforced, other S.F. parks will be adversely affected. Our people and dogs need exercise and that takes space. Dogs can't fetch, play and swim on a leash. One of my dogs is high energy and one is very old. Fort Funston is a very popular and happy place. Don't Ruin it!

Thank you,

Doreen Malaspina

Correspondence ID: 1803 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: February 14, 2011 Att: Frank Dean. Genneral Superintendent GGNRA. Fort mason, Bldg 201 San Francisco, CA 94123

Dear Mr. Dean,

My name is Gyle Hagerty and I am writing to you regarding the GGNRA proposed change/strategy to manage off leash dogs in your numerous San Francisco Parks. I have lived in San Francisco for 30 years. For 25 of those years I have had a dog and utilize several of your parks (Crissy Field and Fort Funston) on a near daily basis. Most of my visits to the parks are with my dogs off-leash. I'm writing to you because I feel the change in status and the proposed changes are both unfair and harmful to my quality of life and

my ability to enjoy these parks. While I understand that there are some people who feel that there are irresponsible persons and their pets ruining their experience of the parks I feel there is and must be a medium for all of us. Below I have a list of points and concerns that I feel need to be addressed:

1) The Compliance-Based Management Strategy must go. This poison pill that will allow the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions will not work. The change would be permanent. A management plan should not come with a built-in nuclear option, which is what this is. It allows a relatively few bad players to undermine and destroy a traditional recreational use of the area. No number of responsible dog owners will stop what will become the inexorable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. Tens or hundreds of thousands of hours of incident-free dog walking will not matter. There should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status to be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined ' by volunteers biased against dogs? by surveillance cameras? ' is not included in the DEIS.

2) The Preferred Alternative is not acceptable. It is overly restrictive, and its restrictions are not justified by the totality of available data. It is based on separation and exclusion, a management philosophy that goes against the values of the Bay Area in which it is fully immersed. It violates the mandate for the " maintenance of needed recreational open space" contained in the legislation that created the GGNRA. The DEIS is full of negative things that "might" or "could" happen if dogs are allowed off-leash at various sites. But there is very little evidence presented that these hypothetical impacts actually happen. Given the intense scrutiny of dogs by the GGNRA over the past decade and more, the fact that there is not more persuasive real data about significant impacts of off-leash dogs means that there is no real justification for the proposed restrictions contained in the Preferred Alternative. The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with dogs, and could lead to an increase in conflict as more and more people are forced into smaller and smaller areas. The impacts of people moving from the GGNRA into city parks is not adequately addressed in the DEIS. Any alternative must address these impacts on city parks and ways to mitigate them.

3) The GGNRA should develop a new alternative, the A+ Alternative, that

will better balance the recreational needs of the Bay Area with protection of natural resources. The DEIS calls the "No Change" Alternative "A". This is the 1979 Per Policy with some restrictions, particularly restrictions on off-leash at Ocean Beach, Fort Funston, and Crissy Field because of the snowy plover and native plant restorations. More than one-third of Bay Area residents have dogs and we now know the importance of off-leash recreation for dog's physical and mental health, as well as the importance of the significant social communities that develop where people recreate with their dogs off-leash. This large segment of Bay Area residents should not be restricted to significantly less than 1% of GGNRA land (that is how much GGNRA land is available for off-leash recreation in Alternative A) to have a satisfactory park experience, especially since there is little scientific evidence supporting restrictions on off-leash. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the Bay Area. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and education where problems arise. Enforcement of already existing regulations should target irresponsible dog owners who create the few problems documented by the GGNRA, while allowing responsible dog owners to continue their traditional off-leash recreation without harassment.

4) There are not enough trails available for off-leash recreation in the Preferred Alternative. We need more. Not everyone who goes to the GGNRA plays fetch with his or her dog. Many people enjoy hiking on trails with their dogs as their companions. There are not enough trails with off-leash access in the Preferred Alternative

5) The "Poison Pill" of a "Compliance-Based Management Strategy" is unfair since it can only reduce off-leash access and not increase access in the future, and is an attempt to circumvent the legal requirement: of a public process when management changes that are significant or highly controversial are made. It will not work and must be removed.

6) The Preferred Alternative severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA. There is no off-leash access in

San Mateo County in the Preferred Alternative and that must be changed.

7) The Preferred Alternative is overly restrictive. The science and data do not support the level of restrictions on people with dogs included in the Preferred Alternative. When dogs are walked in a responsible way (as most are), there is no conflict with the environment or with other park users. Target people not walking their dogs responsibly, but leave the vast majority of us alone.

8) The Preferred Alternative unfairly mandates that any new land that comes into the GGNRA cannot have dogs either on- or off-leash. This restriction is unneeded, and denies the traditional recreational activity of off-leash dog walking that has existed on many of these lands for decades. It goes against the recreational mandate that was the reason the GGNRA was created. If new land is added to the GGNRA, off-leash access must be allowed on it.

9) The Preferred Alternative is not "balanced." The 1979 Pet Policy allowed dogs off-leash on less than 1% of GGNRA land. Given recent additions of large tracts in San Mateo County to the GGNRA, this number is now significantly less than 1%. Off-leash dog walking started from a position of great imbalance. One-third of San Francisco households have dogs, yet they can currently recreate with their dogs on less than 1% of GGNRA land. The Preferred Alternative allows off-leash on even less, including no off-leash anywhere on GGNRA land in San Mateo County. How is that balanced? By denying the possibility of off-leash on any new lands that come into the GGNRA in the future, the Preferred Alternative will ensure there is no balance between recreation and protection of natural resources in the future. We need more off-leash recreational open space, not less.

10) The Preferred Alternative is based on a philosophy of separation and exclusion. It denies that different park users can co-exist. Rather than share space between different park users, the Preferred Alternative carves up park space into separate areas for different park users. This basic philosophy is the exact opposite of the way we approach problems in San Francisco. It flies in the face of the unique social qualities of San Francisco. The GGNRA needs to develop a new Alternative that will better reflect San Francisco values such as co-existence, shared space, collaboration, and education to address problems should they occur.

11) The Preferred Alternative discourages cooperation between different park users and will increase conflict between park users, as more and more people are crammed into smaller and smaller spaces. Park user groups can work together to resolve problems when they come up. For example, Fort Funston Dog Walkers, SFDOG and the hang glider group Feathered Flyers of Fort Funston collaborated on a series of signs to warn dog owners to

keep their dogs out of the hang glider take-off area.

12) The Preferred Alternative condemns every dog owners for the actions of a very few irresponsible owners. According to the GGNRA's own statistics, 94% of dogs do not chase birds (and most of those who did chased seagulls). Yet, all people with clogs will be excluded from a majority of Ocean Beach to "protect" birds. . Focus enforcement on people who do not keep their dog from chasing birds rather than on excluding all people with dogs.

13) Dog owners are being held to a standard of behavior that is impossibly high, and significantly higher than any other park users. For example, studies by GGNRA staff routinely show people without dogs "disturb" plovers, but there is no attempt to restrict people without dogs from the beaches where plovers roost (not nest).

SUBSTANTIVE COMMENTS

The restrictions on access for people with dogs contained in the Preferred Alternative are not warranted. They cannot be used to justify a fundamental violation of the recreational mandate that formed the reason the GGNRA was created.

1) Severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. Target enforcement on the small number of people whose dogs misbehave, not on excluding the entire class of people with dogs from most of the GGNRA. Jean Donaldson, nationally recognized expert on dog behavior testified before the SF Animal Control and Welfare Commission on 2/8/07: "(Self-selection operates strongly, i.e., people who take the time to get into their car or walk to a designated off-leash area to exercise their dogs tend not to be the type who are derelict in other areas of dog guardianship, such as training, socialization, or appropriate containment."

2) The DEIS does not adequately address dispersion issues. The DEIS does not adequately address the environmental and social impact of forcing large numbers of people and dogs into much smaller areas. Reducing the amount of area available for off-leash will significantly degrade the park experience for people with dogs. It will increase conflicts. Even more importantly, the DEIS does not address the environmental and social impact on small, neighborhood parks in cities like San Francisco next to the GGNRA. Because the GGNRA is located immediately adjacent to one of the most

densely populated areas in the United States (San Francisco), it provides much needed recreational open space for Bay Area residents. If that open space is lost to recreational access, people and their dogs will move to the much smaller city parks and they will not be able to absorb the hundreds or thousands of people with dogs each day that will be kicked out of the GGNRA. As further proof that the GGNRA did not consider impacts on city parks in San Francisco, the Preferred Alternative suggests the nearest legal off-leash area in San Francisco to Fort Funston is Lake Merced. That off-leash area has been closed to off-leash for years and has been turned into a native plant restoration area and habitat for the endangered red-legged frog among other animals. Yet this is where the DEIS suggests people with dogs go.

3) The DEIS continues a trend of GGNRA claims about impacts by dogs on birds that are not supported by the data. It is based on bad science. There is no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife. Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impacts. This indicates that assumptions about impacts from off-leash dogs must be tested and proven to be true before they can be used to justify restrictions. Unfortunately, most of the assumptions cited by the GGNRA have not been adequately tested or proven. In addition, the GGNRA has repeatedly cited research that they claim shows major impacts from off-leash dogs. However, when the raw data from these studies is analyzed, it is clear the claimed conclusions are not supported by the data. This is highly reminiscent of the problems documented at the Point Reyes National Seashore, where claims by staff biologists about negative impacts from an oyster farm located within the park were proven to be baseless when the raw data was independently analyzed.

a) Severe restrictions are not needed to protect the snowy plover. The GGNRA's own data show that off-leash dogs have no impact on the numbers of snowy plovers, a threatened species that roosts only (does not nest or raise chicks) on relatively small parts of Ocean Beach and Crissy Field. Indeed, larger numbers of snowy plovers frequently coincided with times when dogs were allowed off-leash in the area. The 1999 Hatch Report observed 5,692 dogs at Ocean Beach and found that only 6% chased birds (mostly seagulls). Indeed, of these 5,692 dogs, a mere 19 were observed to chase plovers. That is one-third of 1% of the dogs observed. Target those dog owners for enforcement, but leave the other 99.66% of dogs that did not chase plovers alone. Some studies define "disturbance" of a bird so broadly as to include the fact that if a bird merely looked up when it heard a sound,

even if it took no further action, it was a disturbance. The GGNRA's own studies show that joggers and walkers, not to mention parents with toddlers, equestrians, surfers, and other park users "disturb" plovers, yet there is no attempt to restrict their access in the plover areas.

There are much less restrictive measures the GGNRA could take to protect snowy plovers, including the use of temporary "exclosure" fencing when the plovers are present. This would keep everyone, people as well as dogs, out of the area. Enforcement that targets people who intentionally disturb plovers would also help.

During a 2/17/07 Negotiated Rulemaking meeting, Barbara Goodyear, Field Solicitor for the NPS, said that deliberate behavior (e.g., training your dog to chase birds) should be the target of a management policy, but that incidental behavior (e.g., walking by a bird and causing it to flush) should not. Yet the Preferred Alternative cites incidental behavior as a justification for increased restrictions on off-leash dogs.

b) Severe restrictions are not needed to protect the bank swallow. The DEIS claims "continuing" impacts from dogs and/or humans that include digging at or collapsing the burrows of bank swallows, flushing the birds from nests, and causing active sloughing and landslides that may block or crush the burrows. However, there is no documentation that any of these impacts actually occur. Bank swallows burrow near the top (but not at the top) of sheer cliff faces at Fort Funston. There is no way dogs can access these burrows, so there can be no impact on them from the dogs. A GGNRA bank swallow report claimed that these impacts "could occur" even without proof that they actually do. This "could occur" has been changed in the DEIS, to "continuing impacts".

4) The DEIS is full of impacts of dogs on wildlife and other park visitors that "could" occur, but there is little evidence that these impacts actually do occur. After over ten years of intensive scrutiny of off-leash dogs in the GGNRA, it should be obvious if those impacts really do occur. The lack of data indicates they do not. For example, the DEIS mentions that disease "could" be transmitted to people from unpicked-up dog feces. However there has not been a single case of dog-feces-caused human illness reported by the San Francisco Department of Health for over 50 years. A management policy should not be based on hypothetical impacts. It should be based on actual, observed impacts. Hypotheticals that are not actually seen in the GGNRA cannot be used to justify restrictions on off-leash recreation in the GGNRA.

5) The claim that environmental justice requires severe restrictions on off-leash dogs is not supported by the studies cited in the DEIS.

a) The DEIS cites a 2007 SF State study that claims all Latinos and Asians surveyed said that dogs were a problem. However, the study itself was not about the "ethnic minority visitor use experience at the GGNRA" as claimed by the DEIS, but was actually intended to address ways to improve "connecting people to the parks." Off-leash dog walking connects all different kinds of people to the parks. In addition, the SF State study was not an extensive survey ' it interviewed less than 100 non-randomly people who were largely unfamiliar with the GGNRA (only 1/3 had visited at least one GGNRA site in the past year).

b) A second study cited by the DEIS (Northern Arizona University phone study) was a scientifically rigorous study that used random sampling in identifying who was interviewed for the survey. This study concluded that there was no real difference in attitudes between the various ethnic groups about dogs in the parks.

c) Indeed the restrictions on off-leash access supported by the Preferred Alternative will have a serious negative impact on the thousands of ethnic minorities who walk their dogs off-leash in the GGNRA, a point not addressed in the DEIS. Off-leash dog walking is the most diverse recreation activity in the GGNRA, enjoyed by the widest variety of people ' seniors, kids, the disabled, every ethnic group, every sexual orientation, and every social and economic class.

6) The claim in the DEIS that they have to manage the GGNRA in a manner similar to the way they manage parks like Glacier National Park or Yellowstone National Park is misleading and cannot be used to justify the restrictions called for in the Preferred Alternative.

a) The GGNRA is a National Recreation Area, not a National Park. The mandate for the GGNRA's creation was, according to the legislation that established the GGNRA in 1972, for the "maintenance of needed recreational open space". Off-leash dog walking was acknowledged at the time as one of the traditional recreational uses taking place in the GGNRA when it was created. In 1979, the US Congress passed a law that all national park units, including national recreation areas, national seashores, and national monuments have to be managed uniformly. But, concerned that the unique purposes for each park would be overlooked in this change, they added the following language to the law: "The authorization of activities shall be construed and the protection, management, and administration of these areas ... shall not be exercised in derogation of the values and purposes for which these various areas have been established". So there is no mandate to match the GGNRA's policies with National Park Service requirements that dogs not be allowed off-leash in a national park.

b) In 2002, a panel of senior National Park Service officials concluded, in

part, "[T]hat off-leash dog walking in GGNRA may be appropriate in selected locations where resource impacts can be adequately mitigated and public safety incidents, and public use conflicts can be appropriately managed." Adequate mitigations and management already exist 'target people whose dogs bother birds and wildlife or who jump on people, but leave the vast majority of responsible dog owners free to recreate off-leash with their dogs on the less than 1% of GGNRA land on which they've always been allowed off-leash.

c) Dogs are allowed off-leash to hunt in national preserves, and other units administered by the National Park Service. Surely, if it's okay for a dog to be off-leash while it helps chase, corner and kill a wild animal, it should be okay for a dog in the GGNRA to be off-leash to play with people and other dogs.

d) The GGNRA is located in the densely populated San Francisco Bay Area. It is in a major urban area. Much of the land was highly modified by the military when they controlled the land before the GGNRA was created. The GGNRA contains numerous missile silos, artillery batteries, and their assorted support structures. The military planted huge amounts of ice plant to stabilize the sand dunes at Fort Funston and elsewhere. Standards of management that treat much of the GGNRA, especially those parts in San Francisco, like pristine wilderness are misguided.

e) During 2/17/07 Negotiated Rulemaking meeting, Barbara Goodyear, the Field Solicitor for the NPS, made it clear that while all parks are managed to the same level (conservation of resources), there is flexibility in how that is done from park to park. She cited as an example, the fact that you don't manage Yosemite Valley with the expectation that people will have a solitary wilderness experience. You manage it with the knowledge that people will bump into each other in that part of Yosemite. The GGNRA, an urban park located in and immediately adjacent to a large city, does not have to be managed in the same way as Yellowstone or Glacier National. Parks.

7) The level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use of GGNRA resources.

The DEIS states that it will cost nearly \$1million to enforce the Preferred Alternative, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash

dogs.

8) The inclusion of a "poison pill" in the DEIS suggests the GGNRA will use it as an end run to ban off-leash dogs in the near future, bypassing the kind of public process such an action is normally required by law to follow. The DEIS includes a "compliance-based management strategy" that says that, if there is not enough compliance with the restrictions imposed by the Preferred Alternative, the GGNRA will change the management of the various areas to the next more restrictive level ' an off-leash area will become on-leash only, an on-leash area will become no dogs at all. This change will be permanent; with no chance to go back to less restrictive levels at any time in the future. This section must be removed from any final Dog Management Plan.

a) This compliance-based management strategy is decidedly unfair, because it can only be changed in one direction ' toward more restrictive levels of access for people with dogs.

b) There is no provision for public comment in the case of a change in status of an off- leash or on-leash area because of the compliance-based management strategy. The GGNRA has already lost two court cases (and one appeal) when it tried to make a significant and controversial policy change without going through a public process. The federal courts have routinely told the GGNRA that they have to hold public meetings and take public comments before making such changes. Clearly, a change in status of an off- leash area to leash-only would be both significant and very controversial; and therefore should require a period of public comment and public hearings before being implemented. The poison pill in the DEIS is an end run designed to allow the GGNRA to make such changes without having to go through a public process (they can claim the public process was the public comment on the DEIS itself, not on the changes it allows at a future time).

c) How will compliance be monitored? Who will do the monitoring? The GGNRA has repeatedly relied on poorly trained volunteers with a deep-seated bias against dogs to monitor the interactions between dogs and snowy plovers. Why would we expect these compliance monitors to be any less biased? Will their claims of non-compliance be valid? Will the GGNRA resort to the use of surveillance cameras to monitor compliance? While noting that there is no mention of surveillance cameras in the DEIS, GGNRA staff have refused to say they would never be used.

d) This allows a few bad actors to result in the removal off-leash access everywhere in the GGNRA, even if there are tens of thousands of hours of incident-free dog walking for every single incident. Including a "nuclear option" in a management plan is not good management policy. Regulations

already exist to target those who do not control their dogs when they are off-leash. Target enforcement at those bad actors, not at the huge numbers of dog walkers who do not cause problems.

9) Off-leash play decreases the likelihood of dog aggression in dogs. In comments to the SF Animal Control and Welfare Commission on 2/8/07, Jean Donaldson, then head of the Dog Training Program at the Sfy/SPCA and a nationally recognized author on dog behavior said: "There is not only no evidence that allowing dogs off-leash for play opportunities increases the incidence of aggression, to a person, every reputable expert in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access decreases the likelihood. of aggression." She also said: "Interestingly, it could very well be that the safest dogs are those that attend off-leash dog parks." And she said: "There is no research demonstrating that dog parks or off-leash play contributes to any kind of aggression, including dog-dog aggression." 10) A well-exercised dog is a well-behaved dog. Dogs that are not adequately exercised can develop behavior problems such as barking, destroying property in the home, etc. Behavior problems are one of the primary reasons that people surrender dogs at shelters. San Francisco has a "No Kill" goal that no potentially adoptable animal in a city shelter (SF Animal Care and Control, SF/SPCA, Pets 'Unlimited). Representatives of the SF/SPCA have said that the Preferred Alternative will make it harder for the SF/SPCA to perform their mission to reduce surrenders to city shelters and make San Francisco a truly No Kill city.

In closing, I believe the above points and arguments are compelling enough that you and your office are mandated to revisit and re-strategize the manner in which you are proposing to address this situation. I can promise you that in the event that these concerns and arguments are not taken into consideration, I will be actively protesting your management program in its present state. I thank you in advance for taking my concerns into consideration and making the needed changes to your plan.

Sincerely,

Gayle Hagerty

Correspondence ID: 1804 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: As a life-time naturalist, animal and bird lover, I suggest that it would be irresponsible of the department, to choose any Alternative but A or instead to do nothing yet. This would provide additional time to create a more realistic and effective alternative than is proposed in DEIS Alternatives B-E.

GGNRA needs to rethink its victimization of off-leash dogs and any proposal that severely restricts the few off-leash dog areas left in the metropolitan areas. These areas are essential to the well being of thousands of citizens. Reduction of this space for off-leash dog enjoyment will not necessarily protect endangered species nor preserve areas for future generations. Constricting the space as much as most of these Alternatives propose is unacceptable.

It is widely suggested that the origin of these proposals are a result of the local Sierra club's refusal to agree with any proposal allowing dogs in recreation areas. If true, this perspective is fundamentally unbalanced and out of sync with the needs of many of this city's citizens. It is biased against dogs and owners and promotes the suppression of a huge part of our society. For the sake of possibly preserving the life of plants and animals that may or may not survive despite our best efforts; the DEIS Alternative complicates what could be a simpler, less expensive solution for enforcement. They would very likely lead to increased conflict as more and more people are forced into smaller and smaller areas. B-E Alternatives are all slanted to condemn dog-owners and therefore they do not appropriately serve a majority of the community .

Furthermore I question the victimizing of dog owners and their dogs as an effective and realistic solution to preserving endangered areas, providing a variety of visitor experiences, improving visitor and employee safety, reducing user conflicts, nor maintaining park resources and values for future generations. The level of enforcement required by Alternatives B-E would be much more excessive and create a resentful and antagonist atmosphere. Alternatives B-E blatantly lack many other possible solutions that would not require such extreme restrictions to people and their dogs.

In support of my thoughts, please understand that I regularly visit Crissy Field on a minimum bi-weekly basis, and have since its makeover. In all my hundreds and hundreds of walks at Crissy Field I have rarely seen an aggressive altercation between dogs, and dog owners or dogs and other people. Nor have I seen a person in danger from a dog. I imagine that altercations have occurred since they are proposed in the DEIS summary, yet I have not witnessed them.

My experience at Crissy Field includes weekdays (when dog walkers have their packs), mornings and dusk, and weekends, (when children and families are prevalent). The majority of my time there has been peaceful and positive and I have observed that other people are enhanced by the experience of interacting with unleashed dogs. Even before I adopted my dog I too would go to the Crissy Field to be around the joy of dogs and their owners experiencing the freedom of open space in a beautiful setting.

For those irresponsible dog owners I am not ignorant, oblivious nor in approval. In fact I would love to find a way to severely penalize those who disregard rules and responsibility and ruin a beautiful situation for the majority of the rest of dog owners. In all my time spent at Crissy Field, however, I have very rarely seen a park ranger or an enforcement of park rules. It took years for the GGNRA to put up a more substantial barricade to restrict the protected plover region of Crissy Field. Yet it resulted in an immediate and dramatic lessening of unleashed intruders. Why then hasn't this approach been more widely used through out all the proposal areas of the city and beyond?

The bottom line is that this recreation area exists as an antidote to city life for all it's citizens, their children and their dogs. Appropriate wild life restrictions are in place and it is up to the GGNRA to enforce these restrictions more effectively, rather than discriminating against dogs and dog owners with restrictive plans. More substantial barricades, more signage and dog owner education, more public awareness and, more frequent enforcement by park rangers would go a long way to correcting any of the proposed problems.

I appreciate your time and cooperation.

Sincerely,

Barbara Oplinger

Correspondence ID: 1805 **Project:** 11759 **Document:** 38106
Received: Feb,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean General Superintendent GGNRA Fort Mason, Bldg 201 San Francisco, CA 94123-0022

Sir:

Re: GGNRA Draft Dog Management Plan

I don't know whose benefit would be served by revoking off-leash permission in GGNRA managed properties, but such an idea is ill conceived and would have many detrimental effects with little positive to show for it.

First, let us establish that rules for rural, destination national parks are inappropriate for urban parks. I speak particularly of Fort Funston. This is a property that is overwhelmingly used by locals and should therefore either serve that population properly or be returned to the city if the federal

government cannot satisfy local needs.

Fort Funston has evolved into one of the most magnificent off-leash areas imaginable, and that is what it should stay. The following considerations support leaving Fort Funston off-leash:

- 1) Off-leash is essential to providing many dogs sufficient exercise which humans don't have the foot speed to meet. Without such outlets for vigorous exercise, there will be an increase of aggressiveness incidents due to pent up aggression. Also, because these dogs would now spend more time on the sidewalks of the city and endure more provocative contacts, there will be more unwanted incidents again.
- 2) Dogs socialize better off leash. If forced onto the leash or onto the sidewalks, there will be more incidents of dog fights, with attendant consequences.
- 3) Owners take ownership of picking up after their dogs at Fort Funston, and there is remarkably little poop left behind given the huge number of dog visits to the park. When these dogs spend more time on the sidewalks, owners will feel less of a responsibility, and whatever feces left behind will be in more problematic locations and create greater public nuisance.
- 4) Fort Funston has access and parking unlike an other property for dog exercise.
- 5) Fort Funston is the only resource in SF that can accomodate hundreds of dogs at a time.
- 6) Concerns about flora and fauna are red herrings. Fort Funston is overwhelmingly in ice plant which is invasive. There are areas that are marked off for native habitat, and those areas are doing well, with the exception that there is invasion by ice plant on the edges of many of these areas. GGNRA is currently allowing this intrusion, so it is disingenuous to express concern about the habitat when the preservation effort is ineffectual. If you don't have the money for small maintenance, the public should be aware of any major expenditures to support proposed changes in rules.

In summary, it is a mistake to think that ending off-leash in these park areas will be a net benefit. People who dislike dogs should be happy that there are these somewhat segregated resources to create a healthier environment for all.

Sincerely,

Victor V. Cordell

I have tried on several days to access the plan online and to make comments there and have not been able to read the site. Any plan consideration should be deferred until the public has reliable access.

Correspondence ID: 1806 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean Superintendent GGNRA Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

San Francisco shares its name with Saint Francis of Assisi, the patron saint of animals. Restricting the freedom of pets at Baker Beach, or any of the otehr GGNRA sites, would seem unfitting. Residents of Sea Cliff and neighboring areas of the City have been taking their dogs to Baker Beach and recreating for 40+ years, and we believe that the 1979 pet policy should be grandfathered into the current dog management plan. Traditional usage should play a crucial factor when drafting new policy, Baker Beach is a low conflict, moderate usage site.

The contiguous beach, China Beach, has a no dog restriction. I have been advised there are no endangered birds and no sensitive nesting habitat at Baker. Those whose dogs use the beach have been careful to keep their dogs off the fenced salt grass area. This ten-acre site has no snowy plovers. I consider myself an environmentalist, and there is no natural resource that is being damaged or destroyed at Baker. The dogs are running on sand. The dog owners pick up the trash on the beach and are not interfering with family activities (in comparison to the nude men running around at the far end of the beach). That overt behavior seems more disturbing to children than any dog. I have seen illegal camping with tents and fires, pot smoking, discarded cigarette butts and alcohol bottles (some broken and dangerous) at the beach which are cleaned up by dog owners.

There is a low level of visitor activity in the early hours when many people walk with their dogs on the beach in the early morning (especially as it is usually foggy). The only other people there are the occasional fisherman or surfers. How are dogs improper? Private dog owners are respectful of visitors, use voice control and generally avoid the beach at peak picnic/sunbathing hours.

The City has more pets than children. There is a valid fair argument for dogs

recreating off leash on the GGNRA. Where will all the local residents go? In addition to practicing good dog etiquette, they are good stewards of Baker Beach, Many clean up after high traffic weekends and party nights. One dog owner even facilitated the recovery of a drowning victim early one January morning. Baker has dangerous riptides..

I do not understand why dogs are singled out as a high profile controversy when natural resources are impacted in GGNRA by fireworks, Blue Angels, cargo ships spewing oil, cruise ships polluting the Bay, etc.

The key word in GGNRA is recreation. Walking with their dogs is how many get exercise and fresh air. It is a great tragedy that in the name of the National Park Service you would take away that privilege. San Francisco is a special case where these dog walking areas have become an integral part of the local and visitor experience.

Respectfully yours.

Jasmine Law-Keeney

Correspondence ID: 1807 **Project:** 11759 **Document:** 38106
Received: Feb,16,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean Superintendent GGNRA Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

San Francisco shares its name with Saint Francis of Assisi, the patron saint of animals. Restricting the freedom of pets at Baker Beach, or any of the otehr GGNRA sites, would seem unfitting. Residents of Sea Cliff and neighboring areas of the City have been taking their dogs to Baker Beach and recreating for 40+ years, and we believe that the 1979 pet policy should be grandfathered into the current dog management plan. Traditional usage should play a crucial factor when drafting new policy, Baker Beach is a low conflict, moderate usage site.

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family activities (in comparison to the nude men running around at the far end of the beach). That overt behavior seems more disturbing to children than any dog. I have seen illegal camping with tents and fires, pot smoking, discarded cigarette butts and alcohol bottles (some broken and dangerous) at the beach which are cleaned up by dog owners.

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The City has more pets than children. There is a valid fair argument for dogs recreating off leash on the GGNRA. Where will all the local residents go? In addition to practicing good dog etiquette, they are good stewards of Baker Beach, Many clean up after high traffic weekends and party nights. One dog owner even facilitated the recovery of a drowning victim early one January morning. Baker has dangerous riptides..

I do not understand why dogs are singled out as a high profile controversy when natural resources are impacted in GGNRA by fireworks, Blue Angels, cargo ships spewing oil, cruise ships polluting the Bay, etc.

The key word in GGNRA is recreation. Walking with their dogs is how many get exercise and fresh air. It is a great tragedy that in the name of the National Park Service you would take away that privilege. San Francisco is a special case where these dog walking areas have become an integral part of the local and visitor experience.

Respectfully yours.

Michael Keeney

Correspondence ID: 1808 **Project:** 11759 **Document:** 38106
Received: Feb,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Golden Gate National Recreation Area Fort Mason Building 201 San Francisco CA 94123

Dear Frank Dean,

We live in the Marina District and are concerned about the DEIS proposal. As the current owners of two golden doodles but with three other dogs as

well, we have walked off and on leash at Crissy field, on the beach and gravel paths twice daily for over 30 years. As you can tell this is a beloved and important activity for our family. This is the only way that the dogs can run free and its essential in a city to have access to this kind of positive exercise. We believe that Alternative A is the best choice and want to keep off leash dog walking in the Crissy field area. We understand that compromises must be made but feel that allotted times for off leash dog walking and seasonal off leash dog walking are better uses of the space than the other alternatives you've provided. We will be attending the meeting at Fort Mason and appreciate your consideration for our concerns.

Thank you,

Bethany Hornthal

Correspondence ID: 1809 **Project:** 11759 **Document:** 38106
Received: Feb,15,2011 00:00:00
Correspondence Type: Letter
Correspondence: To whom it concerns:

It is with great sadness and disappointment that I learned of the GGNRA's proposals and their preferred alternatives for dog off-leash rules around the city.

As a 20 year resident of this beautiful city, I would like to formally register my opposition to what consider to be an overly restrictive and heavy handed approach.

My wife and I have been taking my dog to Crissy field every weekend, ever since she was a puppy. She literally looks forward to this all week... so that she can run on the beach, paddle in the water and chase a stick. And I can say without hyperbole, that our dog is at her happiest when she is running freely on the beach at Crissy Field.

This city has always been known as a dog friendly place, and I would hope your organization has the wisdom to ultimately continue supporting the existing policies which strike a reasonable balance between protecting the environment and allowing 'mans best friend' to play as nature intended.

Sincerely

-Eoin Ryan

February 13, 2011

Correspondence ID: 1810 **Project:** 11759 **Document:** 38106

Received: Feb,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Bldg 201 San Francisco, CA 94123-0022

Dear Superintendent Dean,

I am writing to you to object to the new restrictions proposed for off leash dog recreation in GGNRA administered areas in San Francisco and San Mateo counties. First let me tell you who I am. I am a 79-year-old man who currently resides in San Mateo County. Before moving to San Mateo in 1978 I was a resident of San Francisco from 1946. I was an art teacher in San Francisco schools until I retired from City College in 1992. I have been a volunteer at The San Francisco Maritime National Park for about 10 years where I crew on the hay scow, "Alma" and also spend time doing her maintenance.

I have been walking dogs on San Francisco beaches since 1946. I was terribly disappointed when GGNRA made San Francisco Ocean Beach off limits to leash free dogs back in the 70's. So I moved my dog's recreation area to Fort Funston where we have been going for more than 20 years.

As a frequent visitor to Fort Funston, I have been observing the cliffs being eroded by the wind and waves. I have seen the road being washed away by the surf and tides. I have watched your fences falling down the cliffs and the pillboxes find their way to the beach below the cliffs. It seems to me that in another 100 years, Fort Funston might disappear completely into the ocean, then nobody would get to use it.

I have skimmed through your 1166 page document and studied your arguments for restricting off leash dog walking in Fort Funston to a couple of acres out of more than two hundred and seventy, I am more than appalled, I'm outraged.

I have seldom seen any visitor to Fort Funston without dogs except the hang glider folks. I have never seen a horse on those nicely marked horse trails and I have never encountered anyone whose fear of dogs made them feel deprived of the pleasure of strolling through the area. People without dogs have infinite beaches to stroll on where dogs are not allowed or under leash control. I have never seen a Snowy Plover. The Bank Swallows have more problems with the unstable cliffs than with dogs.

The chemical argument posited about the destruction of the soil by dog feces hasn't bothered the ice plant in the 20 years that I have been coming here. If you can imagine how the serious erosion taking place will eventually carry the whole fort away then the chemical argument has no merit.

In all the years that I have been walking my dogs in the Fort I have never laid eyes on a Ranger. Now the GGNRA intends to spend \$900,000 on policing dog walker leash violations? ...and with photo surveillance? May I humbly suggest that there are many physical problems with the Fort Funston environment that could better use the \$900,000. For starters why not put riprap in front of the disappearing roadway in front of the zoo?

The large community of dog owners in the San Francisco Bay Area has virtually no off leash dog walking opportunities other than Fort Funston. Should that tiny section you are proposing for Fort Funston be implemented it will create the congestion of hundreds of dogs confined in that small area which will become untenable. You will have a prison camp atmosphere with dogfights and owner disputes.

The beachfront your proposal allows is nice, thank you. However it is the only legal beach in the Bay area. California State Parks do not allow dogs at all and most municipal jurisdictions do not permit off leash activity. Since GGNRA now possesses so much of the San Francisco bay/ocean front lands, I mean all; my appeal to you is to continue the current off leash dog policy for the Fort Funston area forever. Respectfully,

John A. Brooks San Mateo, CA 94402

Enclosed: photographs of the Fort Funston local

Enclosed: photographs of the Fort Funston local

Correspondence ID: 1811 **Project:** 11759 **Document:** 38106
Received: Mar,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean-

I hope that people will be able to continue walking their dogs, off leash, on the Oakwood Trail Fire Road, on Tennessee Valley Road in Mill Valley.

It is one of the few places left for me to take our dogs. I am 79 years old, with arthritic hips, which cause me to have poor balance. - Leash dog

walking is difficult for me.

The fire road was originally part of a military installation, I was told. It has been available for dogs + people for many years.

Thank you for considering my request.

Carolyn Mackenzie Sausalito, CA 94965

Correspondence ID: 1812 **Project:** 11759 **Document:** 38106
Received: Apr,04,2011 09:20:39
Correspondence Type: Web Form
Correspondence: The proposal to change the off leash regulations at various sites throughout the GGNRA has not been well-publicized. I take my dog to Crissy Field once a week when I work in San Francisco and there are no notices posted about this proposal. I have no idea if it has been posted at any of the other sites affected by the proposal, but I have asked friends who use Rodeo Beach, and they knew nothing about the proposed changes.

I've read through the proposal and am unable to find any reason for the recommendation of reducing the off leash use of the Crissy Field airstrip. (The proposal recommends reducing it by two thirds.) My dog needs a large space to exercise off leash and the airstrip is an ideal size and surface. I use off leash facilities in the East Bay - the dog park at Cesar Chavez Park in Berkeley, Point Isabel, and the East Bay Regional Parks. All of them have problems. In the summer, the wild areas are hazardous because of foxtails and other grass seeds. In the Regional Parks there are problems with ticks, rattlesnakes, and poison oak. I can understand that the needs of wildlife are important, but the airfield is not a wildlife habitat. It's irrigated and mowed and located in the middle of a developed area. I see no reason to change its usage from the current arrangement.

Correspondence ID: 1813 **Project:** 11759 **Document:** 38106
Received: Apr,04,2011 09:32:52
Correspondence Type: Web Form
Correspondence: I commend the purpose and goals of this policy re-assessment. People and dogs are inseparable and any policy that addresses the need for people to be able to enjoy recreational opportunities must provide a reasonable opportunity to share that recreation with dogs. But dog owners must be responsible for managing and cleaning up after their dogs. I believe that clarity of rules will be a big help. I prefer alternative A and urge that changes be made in increments so that stricter rules can be evaluated

effectively to see what works and whether further restriction is really needed. Please do not over-react or over-regulate.

Thank you, Julie Allecta

Correspondence ID: 1814 **Project:** 11759 **Document:** 38106
Received: Mar,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I think that removing dogs from GGNRA parks and trails would be an absolutely ridiculous and unfair policy. Banning dogs from these trails would force an unecessary amount of people to have to change were they walk their dogs. This proposition is extremly unfair and allows horses to still use these trails. Horses are just as bad for the trails as dogs if not worse. Banning dogs from the trails does not make sense and will be extremly unfair to many dog walkers, and their dogs.

Sincerely,

Charles McMahon

Correspondence ID: 1815 **Project:** 11759 **Document:** 38106
Received: Apr,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: On Sunday morning (4/3/11) around 10:30 am I was taking a leisurely hike with my wife and 5 yr old daughter on the Lands End trail heading west from Sea Cliff. The weather was quite nice so naturally there were plenty of people out that day. We encountered 4 or 5 dogs off leash. Our daughter gets scared by unleashed dogs. We also saw plenty of people climbing over and walking around signs warning of no hiking/steep cliffs...of course the majority of people follow the rules ...but I was alarmed at the numbers showing disregard for the rules.....I'm sure that an enforcement presence would quickly pay for itself on this trail...Thanks

Rob Schusteritsch

Correspondence ID: 1816 **Project:** 11759 **Document:** 38106
Received: Mar,17,2011 00:00:00
Correspondence Type: Letter

Correspondence: Kevin Day Address Withheld San Francisco, CA

March 15, 2011

Frank Dean, General Superintendent, Golden Gate National Recreation Area, Fort Mason, Building 201, San Francisco, CA 94123-0022

Re: Dog Management Draft Plan/DEIS

Mr. Dean:

I would like to start by thanking you and your staff for the time and the great effort you have made in preparing the Dog Management Plan for GGNRA. I am a GGNRA Park Sponsor, Natural Resources Defense Council donor, and give generously to several other environmental conservation organizations. I am compassionate about protecting our lands and the native habits they support. This is why I am writing today in support of the most stringent controls on dog owners.

Of concern to me are animals under "voice control". I loved reading the idea in the plan to have dog/owner certified as being under voice control prior allowing them off leash. My experience with owners who say their dogs are under voice control is listening to them yell the same commands (usually, 'come here' and 'don't do that') time and time again without result. I like the serenity of a park stroll and this yelling does undermine my experience.

I would also like to see codified guidelines on what extra privileges "companion dogs" would have, if any. I do not believe they should have any extra privileges. Several dog owners bring their dogs into restaurants in San Francisco because their doctors have written them notes say that the dog is a "companion dog" and as such they get special dog tags. If dog owners only have to get a note from their doctors to have an untrained dog outside of the purview of your new rules, the rules themselves will rapidly become feckless.

I have always enjoyed and supported the national parks and will do so in the future months and years to come, hopefully with a little more serenity, on a beach free of dogs, and with a few more snowy plovers nearby.

Thank you again,

Kevin Day

Correspondence ID: 1817 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 00:00:00

Correspondence Type: Letter
Correspondence: March 7, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201 Fort Mason, San. Francisco, CA 94123-0022

RE: Dog Management Plan/ Draft EIS

Superintendent Dean:

I want to simply state that I am favor of Alternative D, as presented in the
Dog Management Plan EIS.

Having served for almost a decade on the Marin County Parks and Open
Space Commission, I can attest to the fact that I have heard almost every
excuse for bad dog behavior that could possibly be presented by the dog
owner. The bad behavior is usually blamed on any and all other factors,
other than the dog itself, or that of the dog owner.

I see no reason to allow off leash dogs to negatively influence the outdoor
experience of others. The dog is not an endangered species. But the dog
certainly can have a negative impact on those endangered species currently
found in the GGNRA.

I respectfully request that National Parks Service support Alternative D,
currently described in the GGNRA Dog Management Plan.

Sincerely, Richard Fraites Novato, CA 94947

Correspondence ID: 1818 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mr. Frank Dean, General Superintendent Golden Gate National Recreation
Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Subject: Dog Management Plan (D.E.I.S.-G.G.N.R.A.)

Dear Superintendent Dean;

Please accept this plea for more restrictive dog-leashing regulations and for
their strict enforcement.

My wife and I are elderly with physician-prescribed walking to treat heart

disease, arthritis, knee-replacement, and other deficiencies.

For 40 years, we have made North Waterfront our home city the key to our required walking program. We use Municipal Pier and The Fort Mason Meadow three or more times per week for periods of 1.5 hours each.

Each passing year brings a rising number of law-breaking owners who use their dogs as tools of the owners' aggression and hostility. Thesedog-owners go far past "civil disobedience" to show satisfaction when sending their loose dogs to charge at us while barking, growling, and snapping.

Thesedog-owners will violate any limit on their own hostility but we hope regulations which require universal leashing will be enhanced and funded to support strict enforcement.

Enclosed is a contribution to be used for any purpose useful to Golden Gate National Recreation Area.

Sincerely,

Dennis C.B. McDaniel

Enclosure

Correspondence ID: 1819 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201 Fort Mason San Francisco, CA 94123-0022

Re: We strongly support the Dog Management Draft Plan

Dear Superintendent Dean,

We have owned dogs for most of my life and are huge dog lovers. But we are also a nature lover who respects the fact that our national parks' foremost mission is conservation. We also know that we have many highly-sensitive endangered plants and animals within Golden Gate National Recreation Area that are having a very hard time surviving given the chasing, running, and digging that occurs in areas where these species. There is such a huge population of dogs now that their impact is significant, which is why it's time to address their negative impacts.

We believe:

- All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.
- There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time.
- Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules.
- The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

Sincerely, Marta and Drew Lindsey San Francisco 94122

Correspondence ID: 1820 **Project:** 11759 **Document:** 38106
Received: Mar,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mill Valley, CA 94941 March 11, 2011

Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to you regarding the Dog Management Draft Plan/DEIS for Golden Gate National Recreation Area. I am requesting that you consider revising your recommendations to continue to allow on-leash dogs on the following Marin Headlands Trails: Coastal Trail (Hill 88 to Muir Beach) and (Golden Gate Bridge to Hill 88, including Lagoon Trail), Coastal, Wolf Ridge, Miwok Loop, South Rodeo Beach Trail, North Miwok Trail (from Tennessee Valley to Highway 1) and County View Trail.

I walk on those trails frequently with my dog and those hikes are an integral part of my life. Those trails are generally not crowded and there is a good mix of people with dogs and people walking without dogs. I have never

encountered any problems between people and dogs, nor have I seen dogs chasing birds or disrupting the environment. The dog walkers on these trails are responsible and clean up after their pets, based upon my observations.

I do think that it is important to limit the number of dogs that one person can walk in the GGNRA and agree with your recommendations on that point.

Sincerely, Kate Gruen

Correspondence ID: 1821 **Project:** 11759 **Document:** 38106
Received: Mar,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 16, 2011

Frank Dean, Superintendent GGNRA Building 201, Ft. Mason San Francisco, California 94123

Re: GGNRA DEIS/Dog Management Plan and NPS Alternative

Superintendent Dean:

I recommend the Park Service adopt Alternate "A" which would allow the 1979 Pet Policy Act to remain in place. Furthermore, I support opening ROLA's in the San Mateo GGNRA Lands. As San Francisco residents, we have walked our dogs daily at Crissy Field, Ft. Funston and Baker beach for nearly 20 years without incident. I would suggest that responsibly walking dogs on these usually cold and windswept beaches is the highest and best use of these lands.

Why waste limited Park Police and Ranger resources ticketing off leash dog walkers when there are far greater life safety law enforcement issues to be addressed elsewhere in the Park? Speeding automobiles, bikers running stop signs, graffiti, aggressive exhibitionism at Baker Beach and other problems created by humans represent far bigger problems than off leash dogs.

Adopt Alternate "A", open the GGNRA Lands in San Mateo to ROLA's, and, by all means, hold a public hearing so that the people can speak and be heard on this important issue.

Sincerely, Colleen M. Kieselhorst San Francisco, California 94123

Cc: Representative Nancy Pelosi, 8th Congressional District of California Minority Leader, U.S. House of Representatives

Martha Walters Crissy Field Dog Group

Correspondence ID: 1822 **Project:** 11759 **Document:** 38106

Received: Mar,16,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

We strongly disagree with GGNRA's potential banning of off-leash dogs from the areas they are currently allowed. These places are the few left in San Francisco and Marin where we can run our dogs to properly exercise them. Well-exercised dogs are good citizens and good family members.

Please help everyone in the city, be they dog people or not, by maintaining the current ability for dogs and their people to appropriately enjoy the urban outdoors as we have been since the GGNRA came to our county.

As a native San Franciscan who grew up running all over the Presidio, Kimball can testify to how beautifully the GGNRA has restored the Presidio. We both have always admired how this restoration and rejuvenation have been accomplished while still giving generous access to the local inhabitants, be they human or canine. Please maintain this status.

Thank you very much.

Best regards,

Kimball Worcester Margarita Rhodes

San Francisco, CA 94118

Correspondence ID: 1823 **Project:** 11759 **Document:** 38106

Received: Mar,15,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

We are not dog owners nor do we plan to be. But we love walking at Crissy Field on the beach amidst the doggies and their wonderful owners and dog walkers. We have been walking there for several years and never once had an issue with dog waste ; the owners and walkers are so diligent about cleaning up after their pooches. They are considerate of us, as walkers, and very friendly. It would be sad to force the dogs onto leashes when they so greatly enjoy running after balls, swimming, chasing each other and

providing such positive energy and amusement for all. We hope you will not take this freedom away from them, at least not on the beach at Crissy.

On the other hand, the bicycles on the path that runs parallel to the beach are a problem. No bells, no warnings . Unnerving on crowded days. They whizz by, perilously close to people. Scary.

Thanks for all you do for all of us who enjoy Crissy. And we do hope that the dogs will continue to be free to run on the beach. Patricia and John
Davis San Francisco, CA 94118

Correspondence ID: 1824 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA. 94123

To whom it may concern:

I am strongly against making Fort Funston dog owners keep their dogs on leashes. It has been an off leash area for decades, and you have no rational reason to change it now. I've reviewed your new Dog Management Plan, and it is an outrage. You intend to restrict off-leash walking to 2 small areas. It's quite apparent to me that you are caving in to the anti-dog faction, and using laughable evidence.

I just heard a report on the radio that gave an account of one of the public meetings you're holding concerning where your information officer, Howard Leavitt, stated that dog attacks on horses, humans, and other dogs are on the rise. This is patent nonsense. I've been out there with my dogs at least 4 times a week over the past few years and I've seen nothing like this Please furnish your data for arriving at this conclusion.

Should we ban people from the park? They've committed more violence than dogs have. Or have you forgotten the gun violence and murder that happened in 2006 at Ft. Funston? You're using the same tainted logic in your conclusions about restricting dogs. If you would bother to go out to Ft. Funston on any random day, you would find hundreds of people enjoying the beautiful spot with their families, including the four legged members.

I'm writing in hopes that you will leave the rules as they are. Fort Funston is one of the only places left in our urban environment where you can actually take your dog for a much needed run. I thoroughly enjoy taking my dog there and would be deeply wounded if I couldn't let them run to their heart's

content. I use the park several times a week.

The National Park Service already denies most of its beautiful hiking areas to dog owners who want to bring their best friends along; dog owners who pay taxes like everyone else and are cheated out of their right to enjoy the parks. Don't make your oppressive policies worse by extending them to Fort Funston.

Sincerely, Dan Gerson

Correspondence ID: 1825 **Project:** 11759 **Document:** 38106

Received: Apr,04,2011 10:29:07

Correspondence Type: Web Form

Correspondence: I would like to see alternative A- no action. There is no need to restrict dogs any further than they are already restricted. The GGNRA has approximately 80,000 acres of land in its jurisdiction. Off- leash dog walking is allowed in only a very small portion of this. North of this is Pt. Reyes with thousands of acres off limits to people walking with dogs and Mt Tam Sate Park which is off-limits to people with dogs. To the south there are several state parks off-limits to walking with dogs and the very large San Francisco water district land which is maintained in a mostly natural state and is off limits to people. Fort Funston and Crissy Field are major recreation areas in a major city. You are attempting to manage them as if they were Yellowstone. This to me represents a rigid bureaucratic mindset. There is no science behind this. Dog walking is a major recreational use engaged in by people of all ages and there is no justification to restrict it further.

Correspondence ID: 1826 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 00:00:00

Correspondence Type: Letter

Correspondence: March 2, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA. 94123-0022

RE: Strong Opposition to GGNRA'S Dog Management Plan

To the GGNRA:

I am a resident of the state of Michigan. I come regularly several times a year to your city to care for an elderly ailing relative who has lived in San

Francisco for at least 50 years.

Hiking with my friend and her dog at Fort Funston is one of the main highlights of my trip. The stress of my visits dealing with my sick uncle's medical and personal needs is greatly relieved by these hikes. It's because of the dogs and being in nature with them that I enjoy it so much. So I was greatly dismayed to hear the GGNRA is recommending severe restrictions on off-leash recreation. One of the reasons given in the DEIS report is that dogs detract from visitors' experience of the park. (p. 279-280) My experience is just the opposite.

I'm always amazed at the hundreds of dogs I see at Fort Funston all getting along, playing, and socializing with people. I have seen people of all age groups and cultural backgrounds out there with their dogs. It would be heart-breaking if GGNRA ruins this for the citizens of San Francisco, the Bay Area, and indeed the whole country. Please let this 1% of GGNRA entrusted land remain off-leash.

Sincerely,

Janet Williams

Correspondence ID: 1827 **Project:** 11759 **Document:** 38106
Received: Mar,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 9, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Dear Mr. Dean,

I am very distressed by the proposed GGNRA "preferred option" to ban dogs on Muir Beach. We live in Muir Beach and are responsible dog owners. Our dogs are always greeted and fussed over by strangers on the beach. The dogs on Muir Beach help to make the beach a friendly, joyful experience for everyone. They create a feeling of neighborhood and community and are an indelible part of the experience of the beach.

There are many options for dog free beaches in Marin. There is only one dog friendly beach. There are other ways to protect sensitive habitat than to ban dogs altogether. The proposal to allow dogs on Little Beach but keep them off the main beach is not a feasible alternative. One of our dogs is fourteen years old. For several years he has not been able to scramble across the rocks to Little Beach. There is an occasional low tide that allows him to cross on the sand, but those times are few and far between. There is no

parking anywhere near Little Beach. As a resident living on Sunset Way, the access road to Little Beach, I can assure you that vehicular access and parking for access to Little Beach would cause a significant problem for the residents.

I strongly urge you to continue to use education rather than segregation. I am a birdwatcher and a naturalist and appreciate the work that has been done on the lagoon. I love to see the otters and look forward to a time when the salmon are breeding. I do not feel that banning dogs from the entire beach is necessary or warranted. Post more signs regarding the restoration of Redwood Creek and its sensitive habitat clearly stating the rules. There are usually more children than dogs playing in Redwood Creek. I support Map 5A which continues off leash beach access for dogs and Map 7A which keeps the Coastal Fire Rd and the Trail at Muir Beach open for dogs.

I find dog owners at Muir Beach to be very responsible. We always carry poop bags and rarely see dog poop that has not been taken care of...but on the rare occasion, I do collect any dog poop that I see. A receptacle at the beach would be helpful.

The cost to patrol the beach would be far more than the cost needed for signage and education. Do not put an end to this long tradition of playfulness and freedom in a community that prides itself on being inclusive and responsible. Sincerely,

Sarah Brightwood

Correspondence ID: 1828 **Project:** 11759 **Document:** 38106
Received: Mar,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 10, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Mr. Frank Dean, General Superintendent:

I am Betty Bozio a senior citizen who still works by walking dogs for other seniors that are unable to walk their dogs anymore. I also walk dogs of tax paying citizens who need their dogs exercised while they are at work. It makes for a more well-adjusted dog which makes it better for the owner, neighbors and society in general. I was born in San Francisco and have been very proud that we are such a caring society. I have met many visitors that have been impressed with the ability to let our dogs run and have a good time. They have also been impressed at how well behaved the dogs are. This is the City of St. Francis where we care about our animals as well as

ourselves. We are forward looking and care about the environment and have been in the forefront of much environmental legislation. I have walked dogs at Fort Funston, Lands End, Sutro Park and Ocean Beach for 35 yrs. The last 12 years I have walked dogs mostly at Fort Funston at least 3 days a week and many times 5 days a week.

I have noticed many changes over the years, the cliffs were damaged severely in the El Nino storms in the 90's and by people trampling the dunes while looking at a dead whale but very little change because of people walking dogs. I also noticed that the handicapped stopped coming after their wheelchair accessible path was dug up in the 90's. There was a little repair needed but most of the path was usable. I missed seeing them and they enjoyed visiting with the dogs and we enjoyed them. There has been a major increase in the raven population after trees were cut down along the cliffs and throughout the park. The small birds would take shelter in the trees and since that was taken away from them they were much more vulnerable to the predator ravens and hawks. I think that has done more harm than people and dogs walking and running around. I also observed that when management closed off one of the meadows, the birds moved over to where we were walking.

You say in your report that your purpose for the restrictive plan you propose is to preserve and protect natural and cultural resources and processes. Instead it severely restricts the "cultural" processes of our community by not allowing the public to use the park. The GGNRA's enabling legislation and it's legislative history are very clear that it's purpose was to "maintain needed recreational open space". Thus management policies that severely restrict recreational access in the GGNRA violate [16 U.S.C. Section 1a- 1], and should not be allowed. The "natural" processes have not been sufficiently researched. In fact I feel, the former actions by management have harmed the natural resources. I also feel it is foolish and dangerous to take the ice plant out of the sand dune areas of these parks, especially at Fort Funston. It has been done at Ocean Beach and the highway is constantly being closed due to blowing sand. They do have an alternate roadway there but there is not one for Highway 35 which goes right by Fort Funston. The winds are severe there many days and the Highway would be a mess. Is that serving the community?

Fort Funston is mostly wild wind and sand dunes, what variety of use is planned? What visitor or employees have been harmed by the current use. The men who pick up the garbage are very friendly and courteous and we seem to enjoy each others company. There has not been a single case of dog- feces-caused human illness reported by the San Francisco Department of Health for over 50 years. The volunteers that sweep the sand off the paths also have had good relations with all of us. I have never seen anyone harmed in my presence, in 35 years. I have heard of a few mishaps but they were

few and far between especially for all the people and dogs that use the park.

If you close the park to use how does that maintain it for future generations? Future generations won't be able to experience the urban recreation it was created for. There has already been restrictions to the handicapped, and to people without dogs also. Management closed off large areas with fences that were supposed to be "temporary" but they are still there a decade later. That means people with children can't play on Joey hill or fly a kite or just sit and watch the sunset on some of the other areas that have been blocked off from the public.

I also strongly object to the "Compliance-Based Management Strategy". I feel it is a self serving attempt to circumvent the legal requirement of a public process when management changes that are significant or highly controversial are made. We are supposed to be a government by the people and the people are objecting to the preferred alternative so this is a way to ignore the citizens of this community This is not serving our community in any way. It is a way for you to change these parks into something they are not. They are not National Parks in wilderness areas. They are urban parks that are badly needed to serve the communities they are near.

Sincerely,

Elizabeth (Betty) Bozio San Francisco, CA 94122

Cc: San Francisco Supervisors, John Avalos, David Campos, David ChM, Carmen Chu, Mafia Cohen, Sean Elsbemd, Mark Farrell, Jane Kim, Eric Mar, Ross Mirkarimi, and Scott Wiener; Senator Barbara Boxer, Senator Dianne Feinstein; Representatives Jackie Speier and Nancy Pelosi; State Senators Leland Yee, Fiona Ma and Mark Leno

Correspondence ID: 1829 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Supt. GGNRA, Bldg. 201 Ft. Mason, San Francisco CA 94123

Subject: Dog Management in GGNRA

Dear Superintendent Dean,

Unable to connect with the proper link on the website of GGNRA, I write to comment on the Dog Management plan under review.

As a long time resident of Marin, who has enjoyed the beaches at Stinson and the trails on Mt. Tam for many years, I believe the dog population of this area has become an aggravation if not a hazard to residents. At Rodeo Beach I have had an off leash dog urinate on my head as I lay face down on a beach towel. "So sorry" was the apology of the owners. "Voice control" of pets is an illusion as a 100 pound animal bounds over to pedestrians and sometimes to children-"he's just friendly" says the owner.

There should be no dogs on beaches where humans swim because their feces do not disappear with the tide and is often under foot. The idea of dog walkers having 6 dogs "under control" even on leashes is an illusion, and of course the excrement left in their wake is a detriment to the environment, not to mention an annoyance to non-dog owning walkers who follow.

Please tighten up on the restrictions for dog owners and dog walkers in the GGNRA.

Sincerely yours, Gloria Neumeier

Kentfield CA 94904 cc: Senator Barbara Boxer, 1700 Montgomery St.,
Senator Dianne Feinstein, 1 Post St. , SF, C A.

Correspondence ID: 1830 **Project:** 11759 **Document:** 38106
Received: Mar,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Frank Dean,

Hikers seek beautiful areas to hike, and those hikers which do, are sometimes solitary individuals which do so with their canine companions. There is the idea of Leave No Trace, which a select few individuals acknowledge or are even aware of, but the main hiker enthusiast may pick leaves, flowers, remove wood, pee, widen paths due to "muddy" areas, and potentially seek "wilder" spots away from the beaten path, to roam on, and as such create trails, that over time become more organized trails that others follow. Humans leave a footprint, a large footprint on these natural areas, one larger than any dog could ever do. We smoke, drink, litter, pee, potentially take dumps in these wild areas. We widen paths, we have introduced thousands of exotic species of both plants and animals, such as scotch broom and ice plants. For you to tell me that the environmental impact that dogs have on these areas is "too large" or "large enough" is difficult for me to understand. In relation to the impact one human makes, 1000 dogs cannot even begin to compare.

Nevertheless, this isn't a comparison between humans and their animal

counterparts, the canine, the reality of the matter is that this is a superfluous request that is bit exaggerated. I am an environmental science teacher. I graduated with a degree in wildlife ecology and conservation, am a Leave No Trace trainer, a Wilderness First Responder, and I do understand the ecology of our systems. One can assess impacts when focusing solely on dog poop, but why not assess the larger scheme of things, why not kill the fallow deer, why not control cat populations, why not wipe out the eucalyptus groves? Do something about things more detrimental than a domesticated dog that hikes for an hour and then goes home with his/her owner. If you want to preserve, then removes humans, dogs, and horses alike. For dogs are no more of a hindrance than us humans.

If you would like, remove the people from the trails, and let the dogs roam for a couple of hours a day. I gurantee you would see less devastation. True, some dogs are crazier than others, but aren't some people, with their beer bottles left around, cigarette stubs which pollute the soil, plants that destroy native habitats. Please reflect on what is really hurting our environment, because if you think dogs are the problem, you are simply putting a Band-Aid on a wound that will not heal. The environment is too fragile and complex to ignore the fact that us humans are the ones that have lead to its degradation not the dogs. Sincerely,

Lyanne E. Abreu

Correspondence ID: 1831 **Project:** 11759 **Document:** 38106
Received: Mar,09,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123

Re: Draft Dog Management Plan/DEIS

Frank Dean:

I completely oppose the changes that either require dogs to be leashed or prohibited from being on public lands. With open space, beaches, parks and trails being overly restrictive already for dog owners/dogs, if this is allowed to pass it will only get more restrictive and before you know it, we won't even be able to walk our dogs down public sidewalks! Seriously!

Pet ownership should be encouraged as a way of removing feral cats and dogs from our communities, showing a little heart, and helping the economy. What happens when the next group decides to ban kids from parks, or restaurants or whatever. In our alienated society, pets are link of

compassion for many. Don't make it a hardship. You are creating a world where people will be incarcerated for recreating with their pets, and then not get jobs because they had felonies on their record.

As conscientious as I am, and all the pet owners that I know are, about our dogs public behavior and our clean up habits, the few loud voices that want EVERYTHING their way are winning the battle and dogs will be banned nearly everywhere if we dog owners don't voice our objection to such restrictive ordinances.

Diane Olmstead, Founding & Managing Partner W3 Partners, LLC

Correspondence ID: 1832 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to say that I DO NOT SUPPORT the under handed efforts of the National Park Service to remove the designation "RECREATION" from the name of the Golden Gate National Recreation Area. These lands exist in an urban area and were intended for the recreational use of the citizens and taxpayers of San Francisco, San Mateo and Marin. I OPPOSE the renaming of the GGNRA and I OPPOSE the currently proposed "Dog Management Plan" Clearly, it is the intention of this plan to inhibit (and eventually terminate) my freedom to walk with my dog off-leash anywhere in the area. I have been in relationship to the GGNRA lands long before they were GGNRA. The currently proposed Dog Management Plan threatens to cut off my access to this fabulous urban recreational resource and one of the most important and beneficial aspects of my life. To me the resolution of this Dog Management Plan is a matter of life and death.

This GGNRA "Dog Management Plan" addresses 1% of 78,000 acres. It seems to me that off-leash dog walkers must be at least 1% of the people included in the definition of "recreational users" of the land. This being the case perhaps we could develop one or two more palatable alternatives that would serve the needs of all stakeholders. My choice would be to leave it well enough alone.

FORT FUNSTON, SAN FRANCISCO GGNRA Access to be denied the handicapped and aged

Many citizen dog walkers have been walking and exercising dogs at Ft. Funston for decades. We consider ourselves stewards of the land there. Most of us have one dog, some of us have two. We are older. Many of us walk

with the assistance of a cane, a walker and in some cases, a wheel chair. We depend on the paved pathways. Our dogs walk with us. The dogs are under voice control and are leashed if they are not. We often walk in the early morning, we are respectful of the environment and of one another and we appreciate and depend on the social, recreational and health benefits provided us by the privilege of exercising our dogs and ourselves while walking the loop of the Sunset Trail, coastal Trail and back to the parking lot. Many of us cannot possibly walk on the sand and in the sand dunes. We are puzzled by the severity of the proposals for Ft. Funston. The EIS "Incidents Involving Dogs in 2007 and 2008" table (pg. 130) clearly demonstrates that Ft. Funston is NOT a problem area in terms of closed area violations or disturbing wildlife. Why are we being threatened with punishment (ie; loss of the privilege of walking with our off-leash, voice controlled animals) when we have done nothing wrong?

VIABLE ISSUES Sensible Number of Animals

There is undoubtedly an issue to be addressed in terms of the number of dogs an individual can control off-leash at one time. We applaud the GGNRA effort to address this issue and suggest that a permitting policy limiting the number of dogs allowed one walker and linking that number to a usage fee could be a considered approach to controlling and financing problems that arise from public use of the facility. Citizen dog walkers (as opposed to commercial dog walkers) have long taken responsibility for the behavior of their off-leash, voice controlled pets. Citizen dog walkers not only clean up after their pets but also support the efforts of park staff with voluntary monthly clean-up of the area. Most citizen dog-walkers have one or two dogs.

Rude Pet Owners

There are undoubtedly some few rude, aggressive and out-of-control dog owners. Perhaps some of the \$1000000 allocated for implementation of this plan could be used to monitor and restrict this sort of behavior in much the same way that our city police must monitor the streets.

Personally, WHY DO I CARE?

My physical and spiritual health is directly correlated to the amount of time I can spend exercising outside in open, natural areas. I am infinitely thankful for the paved loop of the Sunset Trail because I couldn't walk without the pavement. I'm grateful for the Park Service folks who remove the trash every day and for the toilets that are clean and accessible. I'm grateful for my beautiful, long legged dog that runs and leaps and plays in a way that I no longer can and who immediately comes to my side if I am distressed or unable to move on. I don't want to lose my daily walk at Ft. Funston. If I

lose the companionship of the dog and I am constrained to the dunes and sandy areas I will be effectively denied access to one of the most enjoyable activities of my life. I need to be outside in open space. Here in the busy urban areas of San Francisco, Marin and San Mateo we are blessed with an abundance of open RECREATIONAL space and I'd like to see that land stay "open" for all of us. Respectfully,

Mary Ellen McDonnell

Correspondence ID: 1833 **Project:** 11759 **Document:** 38106
Received: Mar,10,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Comments On Draft Dog Management Plan/Environmental Impact Statement Dear Mr. Dean,

I live in and am a resident of the City and County of San Francisco, own a dog who walk frequently, am a lawyer, pay taxes and I vote. Please consider the following comments concerning the Draft Dog Management Plan/Environmental Impact Statement ("Statement"), which comments will also be forwarded to Senators Feinstein and Boxer and Congresswoman Pelosi. It is impossible to address all of the flaws with the Statement in just a letter, but the two largest flaws are: 1) The conclusions are simply not supported by the alleged "facts" that claim to support them. The Statement suffers from expectancy bias. Expectancy bias is where a researcher expects a given result, and then manipulates, cherry-picks and/or misinterprets facts and data in order to reach the given result. This is simply bad science, and the opposite of what the scientific method requires, and

2) The results of restricting the same number of dogs on a much smaller area of land are simply not addressed. What exactly is going to happen when the same number of dogs continue to be walked on half the land (on leash) and one-third of the land (off leash)? Where is the discussion of what will certainly be exacerbated aggression, social, environmental and erosion issues that are inevitable when the same number of dogs are restricted to a much smaller area of land? Where is the discussion of the responsible dog owners and dog walkers who frankly comprise the majority of dog walkers in San Francisco? How is restricting the amount of available land going to make the minority of dog owners and walkers who are not responsible (e.g., those who don't pick up dog waste and don't monitor their dogs) magically start behaving in a responsible manner?

This is not to say that there are not issues that certainly can and should be appropriately addressed. This Statement, however, is no solution and will

only make any alleged problems worse.

Very truly yours, Andrea Huston San Francisco, CA 94117

AH:ahuston

cc: Senator Dianne Feinstein Senator Barbara Boxer, Congresswoman
Nancy Pelosi

Correspondence ID: 1834 **Project:** 11759 **Document:** 38106
Received: Mar,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 16, 2011

Frank Dean, Superintendent, GGNRA Building 201, Fort Mason San Francisco, Ca. 94123

Re: GGNRA DEIS/ Dog Management Plan and NPS Alternative

Superintendent Dean:

We are long term residents of San Francisco who have been responsibly walking our dogs off leash in the areas of Crissy Field, Baker Beach, Fort Funston and at the Lombard Street entrance to the Presidio for decades. We have enjoyed this right to use our public land as a result of the 1979 Pet Policy. This policy established that approximately 1% of the area now managed by GGNRA would be set aside for responsible off leash dog walking (ROLA).

Our preference is that the Park Service adopt Alternate "A" leaving the 1979 Pet Policy in place without changes; it's the old saying, "If it ain't broke, don't fix it". It is a policy that has served us well until the Park Service assumed responsibility, and initiated its aggressive and inappropriate management of these areas. We also support opening ROLA's in the San Mateo GGNRA Lands.

Based on our many years of walking our dogs, we have seen very few and minor problems with unruly off leash dogs. In fact, given your reference to the many hundreds of thousands of visitors that frequent the Park in Table 9, page 271, it seems that pet related incidents are very small.

By contrast, problems created by poor human behavior are a much bigger issue. Specifically, litter, occasional reckless bikers, graffiti at the south end of Baker Beach and aggressive exhibitionist behavior at the north end of

Baker Beach represent far bigger public problems than off leash dogs.

My overall impression of the voluminous Dog Management Plan is that it represents yet another example of a Federal Agency burdening its citizens with overregulation that is neither needed nor wanted and will be costly to enforce. Furthermore, it will require a US Park Police or Ranger presence that would be oppressive. A return to the aggressive US Park Police or Ranger tactics of ticketing dog walkers would certainly further tarnish the image of the Park Service among dog walkers; we simply don't want the feeling of a police state in our parks. Surely the U.S. Park Police or the Rangers have higher life and safety priorities to attend to rather than committing their resources to ticketing responsible dog walkers.

The Park Service has already fenced off most, if not all, the planted areas channeling people along gravel footpaths, reducing the area for open recreation. This is an urban park, located in the City of San Francisco, not a wilderness park like Yellowstone or the Katmai in Alaska. The Park Service should recognize this and orient the park to recreational use by the millions of people who live nearby. Preservation actions that restrict public access by setting aside and fencing off large tracts of land and beaches for the exclusive use of wildlife will only lead to conflict in a dense urban setting.

I must say, I find your concept of "Compliance-Based Management Strategy" to be offensive. By adding this punitive, "poison pill" provision to the Plan, The Park Service is essentially acknowledging that it will be unable to enforce compliance, because people will simply flaunt unfair laws. Non compliance is a consequence of a strong central agency, in an abuse of its power, creating rules and regulations that do not represent the will of the people. If over restrictive regulations are adopted by the Park Service, I expect organized demonstrations will directly challenge the Park Police and Rangers, not a pretty sight in a national park.

Finally, having now attended your public comment event at Ft. Mason last week, I get the feeling the Service is "going through the motions" of engaging the public for its input, but the Service is going to restrict off leash dog walking despite the absence of facts and public sentiment for doing so. Furthermore, engaging the public at these hearings, posting written comments on bulletin boards, is not the same as holding a public hearing. Why won't the Park Service host a true public hearing where people are free to speak, and exchange views freely?

At the Ft. Mason meeting I asked a Park Service representative why the large grass field west of the lagoon at Crissy Field was designated "on leash" and not ROLA as the other field to the west is in the Preferred Alternative. I was told that off leash dogs on this field would create maintenance and erosion issues. Where is the science to support this

conclusion? If this is any indication of the thought process that led you to your other recommendations in the Preferred Alternative, the Park Service has failed us miserably.

In conclusion, I recommend that the Park Service leave us the open spaces along the beaches, and leave us alone to responsibly exercise our dogs off leash. Adopt Alternate "A" and leave the present 1979 Pet Policy unchanged. We also support ROLA's in the San Mateo GGNRA Lands. Finally, hold a public hearing on this very important issue.

Donald H. and Colleen M. Kieselhorst San Francisco, Calif. 94123

Cc: Representative Nancy Pelosi, 8th Congressional District of California
House Minority Leader, U.S. House of Representatives Martha Walters
Crissy Field Dog Group.

Correspondence ID: 1835 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 00:00:00

Correspondence Type: Letter

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area, Building 201 Fort Mason, San Francisco, CA 94123-0022.

Subject: Declarations made against off-leash dogs in the GGNRA Dog Management Proposal are unsubstantiated allegations and do not justify implementation of proposed restrictions that will severely deprive the dog owning community of Bay Area Urban Neighborhood Parks.

General Superintendent Frank Dean,

I recently became aware of the distressing proposal made by the Golden Gate National Recreation Area (GGNRA) to severely restrict where dog owners may take their dogs for off-leash recreation in several Bay Area Parks, and in many cases, will not allow dogs at all (see reference 1: Dog Management Plan/Environmental Impact Statement).

I clearly recall when GGNRA unsuccessfully attempted autonomous enforcement of similar restrictions against dog owners that abruptly deprived dog owners the use of parks and beaches throughout the Bay Area several years ago. Although this time the GGNRA is supporting the agenda with environmental rationalization, the allegations in the report have not been proven and are not peer reviewed. In summary they are as follows:

1) The negative impact of off-leash dogs on the environment of these Bay Area parks due to accelerating erosion, and being destructive to the plants, animals,

diversity, and ground water.

2) Off-leash dogs represent a safety hazard to people using these parks.

After attending the Fort Mason Open House I'm convinced that nowhere in the GGNRA proposal are there substantive studies or proof for these allegations against off-leash dogs. In contrast, these allegations are refuted in studies such as those listed at the end of this letter: Reference 2 (Scientific Assessment of Impact of Dogs on Birds, Snowy Plovers, Small Mammals, Wildlife Diversity, Vegetation and Bodies of Water In Urban Recreational Parks of the Bay Area) and Reference 3 (Statistics and Analysis of Safety Issues Associated with Dogs in Bay Area Parks, and Comparison to Reported Incidents Not Involving Dogs).

My personal experience as a dog owner has been with Fort Funston, one of the parks slated for severe restrictions (see reference 4). For the past 20 years I have seen that the dog owning community is appreciative, responsible, self- policing, independently organizing efforts to clean the park, and skilled in preempting conflicts. The park has provided recreation, relaxation, solitude and fellowship amongst dog owners and their dogs for many decades. Enactment of the GGNRA Dog Management proposal would restrict off-leash activities to a small fenced-off area and take away most areas entirely from dogs, which would destroy the unique and serene ambience, as well as the fellowship amongst the dog owning community.

A final issue is that the GGNRA proposal did not consider the impact of depriving dog owners of these parks and forcing us to try finding alternative areas that may be less safe or even dangerous such as the deceptive and treacherous rip tides present along the coast of many beaches in the bay area. In the last two years two women have lost their lives trying to save their dogs caught in rip tides along Northern California beaches (see references 5 and 6).

As a local dog owner and frequent user of Fort Funston with my dog, I have concluded the severe restrictions delineated by the GGNRA Dog Management Proposal are being promulgated by unproven allegations, and therefore institution of this management plan is unwarranted. Please do not enact this oppressive and unjustified dog management proposal which will destroy the unique ambience and fellowship experienced in these parks amongst dog owners and dogs alike.

Sincerely, Mark Armanini Pacifica, CA 94044

REFERENCES 1. GGNRA Draft Dog Management Plan / Environmental Impact Statement.

<http://parkplanning.nps.gov/document.cfm?parkID=303&projectID=11759&documentID=38106>

2. Scientific Assessment of Impact of Dogs on Birds, Snowy Plovers, Small Mammals, Wildlife Diversity, Vegetation and Bodies of Water In Urban Recreational Parks of the Bay Area. <http://www.sfdog.org/content/do-dogs-bother-birds>

3. Statistics and Analysis of Safety Issues Associated with Dogs in Bay Area Parks, and Comparison to Reported Incidents Not Involving Dogs. <http://www.sfdog.org/content/are-there-significant-safety-issues-around-dogs-ggnra>

4. Satellite Maps Detailing GGNRC Proposed Restrictions On Dog Owners at Fort Funston, San Francisco [Map 16A, top; Fort Funston as it has existed for several decades. Map 16, preferred alternative, bottom; Fort Funston delineating restrictions set forth by the GGNRC dog management proposal]. http://www.sfexaminer.com/files/blog_files/Fort%20Funston.pdf

5. Woman drowns while trying to rescue dog at Sharp Park Beach in Pacifica Sunday afternoon, March 28, 2010. <http://abclocal.go.com/kgo/story?section=news/local/peninsula&id=7355111>

6. Woman goes after dog in surf, drowns at Portuguese Beach along the Sonoma Coast, February 04, 2011. http://abclocal.go.com/kgo/story?section=news/local/north_bay&id=7940470

Correspondence ID: 1836 **Project:** 11759 **Document:** 38106

Received:

Mar,14,2011 00:00:00

Correspondence Type: Letter

Correspondence:

Dear Mr. Frank Dean and the rest of the members GGNRA,

We are writing to give our input to your proposal to limit off-leash dog areas: DON'T!!!

We pay \$6.00 bridge toll and spend money on gas, just to drive over from Oakland to walk our dogs @ Chrissy Field, Fort Funston and/or Muir Beach. Our dog owner friends do as well.

Then of course there is the \$4.00 specialty coffee, hot chocolate or juice we buy when in the city. There is of course a pastry involved, another \$3.00 or so. Often we decide to have lunch while we're there in S.F., or stop quickly @ Macy's to purchase something. All of this income generated to the city & county in the course of walking our dogs!

Please do not make the two things pictured on the front of this card archaic!

We vote and we pay taxes. Thank you for your consideration of our opinion in this matter.

Cathy & Mary Fenstermaker

Correspondence ID: 1837 **Project:** 11759 **Document:** 38106
Received: Mar,15,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I have been following the story of restricting off leash dogs in the GGNRA. We live on Octavia St. + walk practically daily to Crissy Field + the Warming Hut, we drive out to Ocean Beach often + even to Ft. Funston. Those areas are magnificent open nature. GGNRA is a gem of a resource. It is our backyard + by "our" I mean man + dog. It is heartwarming to see the dogs run like crazy, chasing balls + frolicking in the water.

We do not have a dog but we love watching them and their people. It connects us to our humanity. I feel it is a pitiful excuse to restrict the off leash area even more than it is currently. As one ages it is good to be able to watch kids, dogs, adults pla and enjoy each other. It pulls us int othe greater family. I implore you NOT to restrict the off leash areas anymore than presently designated. It is recreations for all of us + YES we can all live together.

Sincerely,

Sherry Kramm

Correspondence ID: 1838 **Project:** 11759 **Document:** 38106
Received: Mar,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

Here are my ideas for the G.G.N.R.A.,

- 1) Go after the 5% who are troublemakers. Its like "taking a cannon to destroy a quart otherwise".
- 2) Don't want Fort Funston again as it was in 1970's as a criminal hangout.
- 3) Bring back Fort Funston to S.F. and away from the Feds forever!!! I owe

this my long sheltie "Brandy". He & I both loved Fort Funston

4) No leashes for dogs.

5) The old commons were there in the 1930's and 1940's to protect us from the facist Japanese and the nuke missles where there in the 1960's to 1970's to save us from the Communist Russians - no more tyranny from anyone else please?

6) I never had problems with anyone else, dogs, plants, birds, etc...at Fort Funston (and I still go there alot!

7) I used to be a mail clerk at the Presidio and I really appreciate what the G.G.N.R.A. has done there and elsewhere, but don't go "overboard" with Fort Funston, Ocean Beach and Sutro Park.

Sincerely,

G.L. Hastings

*Plus I was a S.F. city gardener for over 14+ years too!

Correspondence ID: 1839 **Project:** 11759 **Document:** 38106
Received: Mar,08,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean and Mr. Jarvis,

I hope you will consider retaining off-leash access for dogs in GGNRA. I feel very strongly about this, not just for the health, safety, and well-being of our dogs, but also of our families.

Dogs provide tremendous service to many people and families, and to relegate them to on-leash walks at human place, with little opportunity for native interaction with nature and themselves is not adequate and not fair. Fort Funston in particular has been a fantastic place for my dog and my family. She has become socialized and ergo more safe, with people and dogs, and significantly more healthy. The small postage-stamp-sized dog parks we have simply do not cut it.

Furthermore, these areas were specifically set aside with this use in mind. It is unconscionable to further restrict the tiny amount of free space that we make available for those wonderful additions to our lives. Providing for off-leash access makes our dogs and our families healthier, happier, and safer.

Regards,

Sherry Listgarten

Correspondence ID: 1840 **Project:** 11759 **Document:** 38106
Received: Mar,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: To whom it may concern,

I have recently become aware of the proposed legislation banning dogs from trails in the GGNRA. I cannot stress how ill advised this decision is. Dogs are an integral part of Marin County. From the Tennessee Valley- Muir Beach trail to Crissy field, dogs are a common sight. Quite frankly, if you ban them from the GGNRA, you will have a loss in profits. What dog owner wants to go for a walk to the Crissy Field warming hut or to any number of GGNRA sponsored vendors without their dog? And as to the fact that horses are still going to be allowed, I can't begin to explain why this is hypocritical. Horses tear up trails, eat vegetation and leave large piles of feces. If horses are allowed, dogs must also be allowed.

Sincerely Jackson Lundgren

Correspondence ID: 1841 **Project:** 11759 **Document:** 38106
Received: Apr,04,2011 00:00:00
Correspondence Type: Letter
Correspondence: To Frank Dean, General Superintendent, Golden Gate National Recreation Area, Fort Mason, Building 201, SF, CA 94123

This letter is to comment on the proposal that would ban dogs in certain areas (21 sites in the GGNRA including those in Pacifica, CA..

First dogs serve as companionship to people, and are not part of the ecosystem. The coast birds are part of the ecosystem and must be protected and maintained. The coast in California is the habitats of birds and must be guarded. The coast birds that live, breed, and nest must be safe-guarded. This dog management plan is to help rescue these coast birds from extinction. The GGNRA has to be dedicated to conservation as a coast guard tradition. Dogs pose a threat to nesting on the Coast. Dogs need to keep distance during nesting seasons and the GGNRA must have a plan + a way to make sure nothing (dogs) do not threaten the birds. the GGNRA plan is good, before a force- a legal force is forced to guard the birds from dogs at gunpoint. the dogs are predators, and serve only as companionship. allowing

dogs to continue on bird nurseries is a threat to nature's birds, and coastal bird sanctuaries.

Sincerely,

Ramos

Correspondence ID: 1842 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to say that we must allow dogs on the trail. Even though dogs do cause damage to the natural environment. This is a quick fix, as we should just make every trail a leash trail. This would keep the dogs in the confinement of trail.

From Pablo Cortez

Correspondence ID: 1843 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to say that we must allow dogs on the trail. Even though dogs do cause damage to the natural environment. This is a quick fix, as we should just make every trail a leash trail. This would keep the dogs in the confinement of trail.

From Pablo Cortez

Correspondence ID: 1844 **Project:** 11759 **Document:** 38106

Received: Mar,14,2011 00:00:00

Correspondence Type: Letter

Correspondence: To Whom It may Concern,

I would really like to keep walking my dog on the trails. I think that dogs and people make the same impact on the trails, and all less than horses. Also, I do not see why dogs should not be allowed, as many dog owners follow the rules. Thank you for hearing my concerns.

Correspondence ID: 1845 **Project:** 11759 **Document:** 38106

Received: Mar,17,2011 00:00:00

Correspondence Type: Park Form

Correspondence: This no dogs on Sweeney Ridg and many other places is an outrage! Next people will be banned to protect the rocks + rabbitts You GGNRA with your pensions + fat paychecks could put garbage cans up here too! less federal control there's no endangered species up here!

Correspondence ID: 1846 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Dear Superintendent Frank Dean & Committee,

It feels to me as if the GGNRA Draft Environmental Impact Statement for dog management did not address the most important impact: how it will affect my rights as a citizen and lover of my parks and beaches in the Bay Area. In your 10 year project and all of the 60 pounds of papers your committee has submitted did you consider the impact on us as law abiding citizens? Have you considered how many dogs may be abandoned and no longer adopted to new owners? I recently received a letter asking for donations to keep our parks running. Your committee leaves me no choice but to stop all donations and any financial benefits given to preserve our parks! If I have no choice than no more money! This is NOT about our beloved dogs! It is bigger than that! It's about my personal right to enjoy my parks and beaches and enjoy my walks with whom I choose, and I choose my beautiful McNab/Greyhound mix Roxy Boots!

Thank you,

Miriam Browne

P.S.- the budget of \$900,000 - \$1,500,00 is criminal - just to put up signs? Why not ask us how we can make the parks a better place? 1) having more garbage cans available 2) removing dead seals + other animals 3) clean water and many more important issues!

Correspondence ID: 1847 **Project:** 11759 **Document:** 38106

Received: Mar,10,2011 00:00:00

Correspondence Type: Park Form

Correspondence: To whom it may concern,

As a resident of San Francisco I would like to plead with the powers that be to keep a portion of our beaches and all of Ft. Funston "off-leash" friendly.

I have a dog that lives to visit these places and run freely. With the help of a walking service our dog is at Ft. Funston at least 6 times a week.

Please keep our city dog friendly.

Such a small percentage of SF residents have a safe backyard. We need these parks desperately for the well-being of our dogs.

Thank you for your consideration,

Mary + Jordan Klineman SF, CA 94131

Correspondence ID: 1848 **Project:** 11759 **Document:** 38106

Received: Mar,21,2011 00:00:00

Correspondence Type: Park Form

Correspondence: We have a dog named Trekker. We take him off leash every day. We are Seniors and he keep us in shape. He has opened our eyes to lots of parks in the area. He gets us out of the house.

Young people have children. Everything seems to revole around kids. We have our dog to keep us busy.

If you take our right to take our dog off leash you will take our only source of exercize, fun, entertainment and love away.

We are very good about picking our dogs poop. Much better than most parents with there food wrappers and drink containers. Please opt for option A. How would you feel if you only got out with a leash around your neck?

STOP SPENDING so much on something that does not need to be fixed. It is already hard enough to find places to take your dog. Dogs did well for years. The dog (very few) that have ever had problems are dogs kept confined.

Correspondence ID: 1849 **Project:** 11759 **Document:** 38106

Received: Mar,15,2011 00:00:00

Correspondence Type: Park Form

Correspondence: Born and raised in the Bay Area I truly appreciate the GGNRA and have taken many hikes throughout the park boundaries. Indeed, my visits predated the birth of the GGNRA in 1972 as I visited Kirby Cove, Lands End, Ocean Beach, Fort Cronkite, Chirva Beach and Baker Beach in my childhood and through high school and college graduating in 1973.

As a long time resident I cherish these lands and the efforts of those who have set aside these lands for the enjoyment of all.

It is important that these areas are enjoyed not only by humans but other species as well. I believe strongly that these areas can be managed to the benefit of humans wildlife and dogs. To see a dog running free off lease enjoying the open space and company of other dogs is part of the well being of many many people. Ft. Funston is a perfect vnuce for this. I also believe wildlife should be protected. This can be done in a managed way with most of the GGNRA devoted to humans and wildlife. But we must keep some land open and available to all. A continuous path around the Ft. Funston area open to dogs off leash while protecting the Center and other sensitive area would afford this opportunity to serve all.

Thank you,

Jean Mecorney

This addresses Ft. Funston only, however we need other off lease and on leash areas in other parks as well.

Correspondence ID: 1850 **Project:** 11759 **Document:** 38106
Received: Mar,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean General Superintendent Golden Gate National Recreation Area Building 201 Fort Mason San Francisco, CA 94123-0022

Dear Superintendent Dean; March 6, 2011

Enclosed please find my comments about the Draft Dog Management Plan/Environmental Impact Statement.

Personal Background:

I am a long time resident of San Francisco and a recently retired senior citizen. Since I was a child I have loved animals, walking outdoors and exploring nature. I am a great believer in parks- local, regional and national. I also support a variety of environmentally oriented organizations,

contributing money and, since my retirement, considerable time working as a volunteer. I spend many hours talking to the public about wildlife, habitats and the environment.

With my love of walking outside and my love of animals, it was short step to getting a dog when I retired. Like many residents in San Francisco, I live in an apartment style building with no yard. My only option for exercising her is to walk the city streets and to go to the local/regional parks and beaches. Since I cannot give her the exercise she needs everyday (my volunteer duties and other commitments get in the way) I also have her go to a commercial dog walker three days per week on average.

In the past five years in the company of my dog I have become very familiar with the San Francisco City Parks and the GGNRA lands in San Francisco and Marin, spending many hours each week visiting these areas. These sites provide us with a wonderful range of beaches, trails and open space to get exercise and play while enjoying the wonderful setting. As a senior retiree, my dog is a very important member of my family. She keeps me exercised, entertained and provides companionship while we explore the area. We visit on a weekly basis Crissy Field, Baker Beach, Fort Mason, Lands End and we are regular visitors to Fort Funston, Sutro Heights, and other GGNRA sites in San Francisco and Marin. For shorter, daily walks we also are regular visitors to the parks in the City of San Francisco, particularly the two parks nearest to me, Lafayette Park and Alta Plaza Park. As a result of our many hours each week spent in parks, I am quite familiar with the status of the facilities at these various parks and the usage patterns by dog walkers and others.

Personal Expectations for Dog Plan:

Since I greatly value my adventures with my dog and the environment, I looked forward with great interest to the Draft Dog Management Plan/Environmental Impact Statement (DEIS, EIS or Plan). The park resources (local and GGNRA) are treasures that should be preserved. The Bay Area's large urban population is heavily focused on outdoor recreation and puts a strain on park resources. Dogs and dog walkers are only one factor in the heavy demands made upon our park resources. A DEIS which examined dog walking in a balanced and appropriate manner within the context of all park use would be beneficial to all by:

- a) maximizing use of limited park resources while limiting conflicts between different users;
- b) identifying the problems that are primarily attributable to dog walking and addressing those specifically;
- c) providing recognition and rewards for responsible dog walkers thereby encouraging compliance and support for the Plan;
- d) removing dog walking privileges in GGNRA for irresponsible dog walkers.
- e) partnering with local Animal

Care and Control departments f) taking into account impact of proposed changes in GGNRA sites on local and state park resources.

I hoped for a thoughtful, innovative EIS and Plan that would take into account the unique urban location of GGNRA sites.

Overview of DEIS and Plan: To my great disappointment the NPS DEIS is deeply flawed. The supporting EIS document is characterized by poor research, faulty analysis, unfounded conclusions, and an obsession about the ill effects of dogs and dog walkers. (Since I have an M.Sc. and Ph.D. from the University of London, London School of Economics, I am familiar with standards for objective, thoughtful research and analysis of issues.) The DEIS should have focused on real, material problems with dog walking such as use of leashes in busy areas; collection of pet waste; dealing with aggression by some dogs; discomfort with dogs on the part of some visitors; and any significant environmental issues. Importantly, to provide a basis for the assessment of dog walking in the context of other activities, the preparers of the DEIS should have obtained (but failed to do so) some good, solid data on the overall number of visitors to each site and the breakdown of visitors by activity, including dog walking, as well as by domicile (San Francisco, Bay Area, etc.) Instead, the DEIS relies on qualitative estimates on level of activity by visitors. Moreover, in each section of the report, rather than identifying and documenting real issues with dog walking, the preparers of the DEIS highlight trivial problems and risks, often with no context and no support for claims. As a result, the DEIS does not accurately characterize the effects of dog walking on visitors and the environment. Due to these weaknesses the DEIS lacks credibility, and the resultant "Draft Dog Plan" lacks any foundation.

While the NPS's Plan contains a few proposals and concepts that I support, the Plan largely fails to offer a realistic approach to managing dogs and dog walking in the context of other activities in the GGNRA. The Plan's answer to balancing needs of dog walking with other activities is an arbitrary reduction in space in San Francisco permitted for dog walking by one half and a reduction in off leash play areas by two-thirds. With no numerical data on actual visitor use, the Plan does not address needs of conflicting user groups; does not consider the impact of the Plan on the City's parks and residents; does not address the real issues associated with dog walking; does not recognize the efforts made by most dog walkers to manage their dogs appropriately. The new restrictions placed on dog walking are so ill conceived that they will be very difficult for dog walkers to follow. In fact, the Plan seems designed to fail. Compliance/Enforcement provisions of the Plan foresee further restrictions based on almost unavoidable further infringement by dog walkers of unworkable rules put in place under the Plan. The underlying agenda seems to be to bring the GGNRA's dog policy into compliance with the National Park Service standard, where dogs are

restricted to on leash walking in very limited areas; are banned from off leash play, and are not allowed on beaches, grassy fields, trails, etc. This may be appropriate for pristine wilderness areas such as Yellowstone but is hardly suitable for the urban lands of San Francisco and the Bay Area.

Because the DEIS and proposed Plan are so deeply flawed, I believe the entire document should be rejected and a new approach to the problem undertaken with the help of outside consultants that will look at the role of dog walking with an innovative and practical approach that is not built on preconceived National Park Service views on the highly restricted role of dogs and dog walking in national parks. My detailed comments about the DEIS are contained in the attached document.

Sincerely,

Katherine Pattinson

Comments on the Draft Dog Management Plan/Environmental Impact Study (DEIS)

I) Purpose, Need for Action and Objectives of DEIS: a) In the Executive Summary on p. i, the DEIS includes the following statement:

"Purpose of the Golden Gate National Recreation Area" The purpose of the GGNRA is to offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic, and recreational values.

Comment: As the DEIS states on p. ii of the Executive Summary, the lands of the GGNRA have a long tradition of dog walking, including off leash dog walking, which predates the formation of the GGNRA by decades. Dog walking is an historic, scenic and recreational value for many generations of residents who have walked dogs in these lands; enjoyed seeing their dogs at play in the GGNRA; and experienced delight in playing with a dog at the beach; having the companionship of a dog on the trails, and enjoying other forms of recreation at the GGNRA with dogs. The DEIS fails to consider fully the historic, scenic and recreational values of dog walking. The DEIS also fails to look at a "national park experience" as meaning something other than an all dogs on leash all the time in as few areas as possible. The DEIS should be revised to put appropriate emphasis on preserving the traditional values of dog walking at GGNRA and to look beyond the standard NPS dog policy for the meaning of a "national park experience."

b) Under the Need for Action on p. i Executive Summary, the DEIS states: "A plan/EIS is needed because GGNRA resources and values could be compromised to the extent that, without action, those resources and values

in some areas of the park might not be available for enjoyment of future generations.

Comment: The DEIS fails to characterize accurately the impact of dog walking on the resources and values of GGNRA lands and fails to provide evidence to support this statement. In fact, the DEIS does not take into account the damage done to traditional historic, scenic and recreational values associated with dog walking in the GGNRA as a result of the DEIS massive reduction in space available for dog walking. The DEIS should be revised to remove the negative description of dog walking from this statement and to take into account the negative effects of its Plan on the historic recreational resources and values of dog walking in the GGNRA.

c): Under the Need for Action the DEIS further states: "Additionally, a dog management policy inconsistent with NPS regulations and increased public expectations for use of the park for dog recreation have resulted in controversy, litigation, and compromised visitor and employee safety, affecting visitor experience and resulting in resource degradation. The conflicts will likely escalate if not addressed in a comprehensive plan/EIS."

Comment: The DEIS inappropriately suggests that a dog policy inconsistent with the standard NPS policy is the source of all dog problems in the GGNRA. There is no evidence to support that statement. The DEIS also fails to characterize accurately the effects on visitor and employee safety and resource degradation from current dog walking practices. The DEIS should be revised to delete the suggestion that the NPS standard dog policy would eliminate any dog related problems and the DEIS should remove the negative characterization of dog walking from the Need for Action, based on the following:

i) The National Park Service (NPS) has a long tradition of managing dogs by severely limiting access to dog walking in national parks, typically requiring leashes at all times and restricting dogs to parking lots and paved roads, while banning dogs from trails and beaches. Throughout the document, the DEIS interprets a "national park experience" as an experience without dogs. The DEIS fails to recognize the unique character of the GGNRA and its urban setting. The DEIS should be revised to recognize that there are other solutions to managing dogs than the NPS standard policy which is appropriate for wilderness parks such as Yellowstone or for historic parks such as Independence National Historic Park in Philadelphia but not for the GGNRA.

ii) The DEIS has no support for the statement about "increased public expectations for use of the park for dog recreation". The DEIS should be revised to remove that phrase based on the following: ? The DEIS states in the section on Visitation Trends, pp. 266-267 that the rate of visitation has been stable at approximately 14 million for the past thirty years and is

expected to remain at that level for the next twenty years. The DEIS has no data about the number of dog visits per annum. Based on the stable rate of visitation and the absence of any data on dog visitation, the DEIS can not make the claim of increased public expectation.

iii)The DEIS provides no support for a significant impact on visitor and employee safety from dog walking as indicated by the following: ? An extremely small amount of Law Enforcement (LE) time is currently devoted to dog management issues. The DEIS states (p. 283)that "Approximately 1 percent of LE (law enforcement) time is devoted to dog management-related issues." If dog walking is such a major issue for visitor and employee safety as suggested in the Need for Action, why is law enforcement only spending one percent of its time on dog management issues?

? To illustrate effort devoted by LE to pet related issues, the DEIS provides statistics on incidents and case reports related to dogs and visitors during 2007-2008 in table 9 provided in Appendix G. The data in this table reflect the heavy emphasis on leash law enforcement with over 70% of the 2,424 incidents defined as a leash law violation. In contrast, only 9% of the incidents reflected violations for serious infractions such as dog attacks/bites (2%), disturbing wildlife (2%), and hazardous conditions/pet rescue (5 %). Moreover, over one third of the incidents recorded in Table 9 were based on reports from the public, not on incidents where park service personnel were present at the time of the alleged violation. With only 1% of LE time devoted to dog management issues and with 70% of that time devoted to leash law violations, the portion of LE time devoted to health and safety issues for visitors and employees related to dogs (as well as wildlife disturbance) is less than three tenths of one percent.

? The DEIS does not provide any data on the number of dogs visiting the park. However, a conservative estimate of one million dog visits per annum seems appropriate in the context of 14 million visitors per annum. Assuming one million or more dog visits per annum, the number of all incidents (including those reported to park personnel by the public) represents a fraction of one percent of the total dog visits. With less than one percent of dogs cited for any problem (including 70% of incidents related to "leash law" violations), there is no support for the DEIS claim of significant safety and resource degradation issues related to the dog walking visitors.

ii Comment: The DEIS in the Need for Action also fails to characterize accurately the urgency for action in the following sentence. The DEIS should be revised to delete this sentence. "The conflicts will likely escalate if not addressed in a comprehensive plan/EIS." ? Statistics provided in table 9 on dog management issues reflect a significant decline in all forms of incident from 2007 to 2008. During that period, the number of all incidents declined by 42%. The most serious categories of incidents declined by 61%

while leash law violations declined by 39%, suggesting that dog bites/attacks and disturbance of wildlife showed a declining trend.

c) Objectives: The DEIS on pp i-ii lists the Objectives of the DEIS which include:

? Visitor Experience and Safety: ?Minimize conflicts related to dog use by providing a variety of safe, high quality visitor use experiences, including areas where dogs are allowed:

Comment: The DEIS lacks scientifically gathered data on the number of visitors to each site, the breakdown of visitors by county of domicile, by type of activity and by location at site where activity takes place. With no information on the actual number of dogs, visitors, activities and source of visitors, the DEIS has no foundation for designing an appropriate Plan. (It is ironic that as part of the Compliance Management Plan the DEIS foresees counting the number of dogs at each site.)The DEIS thus fails to meet the above Objective on Visitor Experience and Safety. The DEIS should be revised to address the following concerns regarding lack of information on visitation as support for DEIS.

? DEIS has no scientifically gathered information on number of dogs, visitors, activities and source of visitors, and there is no real basis for allocating space among user groups including dog walkers. ? Park Service relies on one phone survey sampling residents from San Francisco, Marin, San Mateo and Alameda who may/may not be regular park visitors and focus of survey was on attitude towards dogs. ? Park Service also relies on qualitative estimates from Park Service personnel and from "Negotiated Rule Making" exercise but provides no actual estimates of number of dogs and dog walkers, percentage of dog walkers relative to other visitors or even documentation supporting the qualitative estimates. By drawing on qualitative estimates from mixed sources the DEIS lacks reliable and effective data.

Natural Resources: ? Protect native wildlife and their habitat (including sensitive species and their habitat, and federally or state listed, unique, or rare species) from detrimental effects of dog use, including harassment or disturbance by dogs. ? Minimize degradation of soil and water resources by dog use. Comment: The DEIS fails to provide evidence for the detrimental effects of dog use noted above. The DEIS should be revised to evaluate the effects of dog use relative to the effects of other activities including human contribution to the disturbance and degradation of the environment from a variety of activities other than dog walking.

? Preserve opportunities for future natural resource restoration and

enhancement

Comment: The DEIS fails to provide evidence for impact of dogs on future plans for restoration and enhancement. The DEIS fails to demonstrate relevancy. Please remove this from objective.

Cultural Resources: ? Preserve opportunities for future cultural resource restoration and enhancement

Comment: The DEIS fails to prove relevance of future cultural projects. The DEIS should be revised to remove this as objective. ? Protect cultural resources from detrimental effects of dog use. Comment: The DEIS fails to show any detrimental effects. The DEIS should be revised to reflect lack of evidence.

2) Massive Reduction of Space for Dog Walking both on leash and off leash: The DEIS calls for eliminating over half of the total space in San Francisco currently allocated to dog walking and over two thirds of the space allocated to off leash dog walking based on maps provided in the document Appendix (comparing Alternative A with Preferred Alternative)

Comment: The DEIS fails to consider the following effects related to the massive reduction in dog walking areas in the GGNRA. The DEIS should address these effects as outlined below:

a) Severe Negative Impact on Parks in San Francisco: The proposed plan will place more stress on San Francisco city parks that cannot handle current need for dog walking and off leash play. While the GGNRA plan references map 27 showing 28 off leash dog areas in San Francisco, the referenced parks cannot support the added demand. i. The GGNRA manages approximately 942 acres in San Francisco with over 600 acres of that area currently available for dog walking and over 500 acres area available for off leash play, based on maps provided in DEIS. ii. The amount of space in city parks for dogs, particularly off leash play, is a small fraction of the GGNRA lands

? Less than 127 acres are designated for off leash dog play in San Francisco City parks while the GGNRA Plan would reduce off leash play areas by an estimated 300 acres. ? The city parks referenced in the DEIS Map 27 do not currently have adequate facilities for off leash play. For example, Park Merced no longer has a dog area. Moreover, the two parks referenced near me, Lafayette Park and Alta Plaza Park have off leash dog areas that are extremely unsafe with no barriers to prevent dogs chasing into nearby street. Most dog walkers chose not to let their dogs play in these areas as a result and seek other areas off leash play.

b) Failure to assess accurately impact of dogs in greatly reduced space in

GGNRA. A much higher concentration of dogs in permitted areas of GGNRA, particularly off leash areas, will result in overcrowding of those areas. Since the DEIS provides no data on the number of dogs currently visiting the park, it is not possible to anticipate the degree of overcrowding. The forced concentration of dogs with individual and commercial dog walkers in a severely limited space is likely to result in significant increase in conflicts between dogs/dog walkers, conflicts with other activities in the designated space, degradation of soil/vegetation in restricted space, and pressure to find other areas for off leash dog walking that are not permitted under Plan, Comment: The DEIS should address these concerns regarding concentration of dogs in sharply reduced space and the DEIS should provide some quantitative support for its analysis of the impact from overcrowding.

3) Severe Limitations on Commercial Dog Walking: The DEIS calls for major restrictions on commercial dog walkers, requiring permits for walking more than three dogs, limiting number of dogs and severely limiting access to space within the GGNRA. Comment: The concept of permitting commercial dog walking is appropriate, but the specifics of the DEIS plan lack scientific or other basis and are unworkable. The DEIS should be changed to address and reflect the following:

? Comment: The DEIS fails to provide any support for limiting the number of dogs per walker to six. The DEIS should be changed to permit up to eight dogs per walker, Most responsible commercial dog walkers can and do handle up to 8 dogs. ? Restricting number of dogs per walker unreasonably will result in higher fees charged by dog walkers and potentially fewer responsible, well trained dog walkers to handle the demand. ? Comment: The DEIS fails to provide support for limiting the space for commercial dog walking, particularly since the DEIS lacks any numerical assessment of number of dogs affected. The DEIS should be changed to give commercial dog walkers adequate dog exercise areas. The Plan provides very limited space for commercial dog walkers, contributing further to the overcrowding issues.

? Under Plan commercial dog walkers will be limited to on leash walking at Ft Mason and a portion of Baker Beach, while off leash walking will be limited to the Central Beach and to less than half of the grassy Airfield at Crissy Field as well as the sharply reduced off leash play areas at Ft Funston. Commercial and individual dog walkers will all have to share these highly restricted areas.

?Failure to put in place an appropriate policy to support responsible commercial dog walkers will have a severe impact on residents of San Francisco. Comment: The DEIS fails to address the severe effects on the local community from its commercial dog walking plan. The DEIS should be changed to address and to take into account the effects of its policy on

local residents.

? Commercial dog walking is an important business in San Francisco employing many residents. Access to commercial dog walking is also extremely important for many residents who work and cannot get home to exercise a dog(s) confined to an apartment and/or small back yard.

? Commercial dog walkers contribute to making good canine citizens since they provide exercise, socialization and training that are key components to a happy, relaxed and confident dog.

4) Massive Reduction in Beach Access for Dog Walkers: Beaches in San Francisco currently provide the vast majority of space available for safe off leash play in the City. Under the Plan, dogs would be completely banned from up to 50% of the beaches while off leash dog walking at the beaches will be reduced by over 50%.

a) Crissy Field Beaches and Grassy Airfield: Currently, dog walkers have access to the East Beach, the Tidal Marsh Inlet, the Central Beach and the entire grassy Airfield for off leash and on leash walking. Dogs are restricted to on leash walking in the Crissy Field Wildlife Protection Area (WPA) for most of the year.

The DEIS bans dogs entirely from East Beach located adjacent to nearby parking, picnicking, bathroom facilities and food vendor. The DEIS also bans dogs from the inlet to the Tidal Marsh. The DEIS further restricts off leash dog play to less than half of the grassy Airfield. The DEIS bans dogs entirely from the Crissy Field Wildlife Protection Area. i)Comment: In banning dogs from the East Beach, DEIS fails to take into account the negative effects and other factors outlined below. The DEIS should address these factors: ? Many families that have children also have a dog and would want access to nearby facilities at East Beach. ? Elderly or more handicapped individuals that want to take their dog to the beach would have access through East Beach. ? East beach sees a lot of activity from windsurfers/kite surfers who drag equipment across beach, making it less suitable for families with small children and beach picnics. ? In practice, fog, rain, and wind make beaches in San Francisco inhospitable for family beach play and picnics for much of the year. Among major U.S. cities San Francisco has the coldest daily temperatures (mean, minimum and maximum) in June, July and August. As a result, dogs would be banned from East Beach for no real purpose. ? Visitors seeking a dog free beach experience with nearby facilities will have access to the beach in the WPA near the Warming Hut.

Comment: The DEIS should be changed to permit dogs full access to the

East Beach for on and off leash play.

ii.)The DEIS also bans dogs from the inlet to the Tidal Marsh. Comment: The DEIS lacks scientific support for its identification of threats to health and safety from dogs with untreated medical conditions playing in the inlet. The DEIS should analyze the health and safety concerns from dogs relative to other, more significant health and safety risks from the following factors: ? Unvaccinated and untreated wildlife (birds, feral cats, raccoons, skunks, coyotes) that may carry avian flu, rabies, worms, etc. that regularly occupy the tidal marsh and beaches ? dead birds, seals and sea lions left to rot on beach by Park Service. ? debris from Bay (condoms, dental floss, etc. found on beach after tides/storms) ? Oil spills ? Run-off and sewage dumped into Bay waters that runs onto beaches and into Tidal Marsh with movement of tides Comment: The DEIS should be changed to permit dogs continued access to the Tidal Marsh inlet outside the protection area consistent with current practice.

ii)The DEIS restricts off leash dog play to the center portion of the Airfield and requires leashes on the eastern portion of the Airfield. Comment: The DEIS provides no scientific or other support for restricting off leash dog play on the eastern portion of the grassy Airfield. The DEIS fails to take into account the following factors that support maintaining the entire Airfield as a off leash dog play area. The DEIS should address these factors and should be changed to permit off leash dog walking on the entire Airfield. ? The Airfield is presently used primarily by dog walkers for on and off leash play and is not suitable for picnics and most other activities because it is often wet (poor drainage) and a distance from bathrooms, etc. It is also characterized by uneven ground with many gopher/vole holes and dirt mounds, patchy uneven grass reflecting impact of many events on natural grass planted at time of restoration of Airfield. ? During the spring, summer and fall months, many events are held on the central portion of the grassy field, making this area unavailable for off leash play. Under the Plan during these events, dogs would have no off leash play area on the entire northern side of the City except the central beach at Crissy Field. ? With a major reduction in other off leash play areas, keeping the entire field available makes sense. ? The Plan calls for making half the field available for off leash and half for on leash only but contemplates no barrier between the two areas. It will be very difficult for dog walkers to even see where the separation point occurs much less observe it.

iii The DEIS bans dogs entirely from the WPA at Crissy Field. Comment: The DEIS fails to provide scientific support for the claim that dogs are the only factor disturbing Snowy Plover and other shorebirds in these areas. The DEIS should examine the effects of human disturbance as well. The DEIS should also ban humans from the portion of the WPA that lies between Central Beach (where dogs are permitted) and the Coast Guard Station.

Human activity (children play, kite boarders practicing, etc) is regularly observed in this section of the WPA. If we really want to give the Snowy Plovers a chance, we should give them a place without human disturbance as well.

b) Baker Beach: Currently, dogs can play off leash on the entire Baker Beach. The beach has limited numbers of dog walkers, has some beach going family groups, has some nude sunbathers and, depending on conditions, some people fishing with surf casting and poles set into sand by waterline. Family groups may include a dog. Most of the groups sitting and playing on the beach as well as most of the people fishing are located in the area immediately down from the two parking lots.

The DEIS limits dogs to on leash walking in more populated area down from the two parking lots but bans dogs from the less visited northern section of the beach (currently occupied by nude sunbathers). Comment: The DEIS fails to provide support for the need to ban dogs from the northern section of the beach and fails to address the overcrowding and inherent conflicts from restricting dogs to the more populated areas of the beach. The DEIS fails to consider adequately the potential for increased dog walking at Baker Beach as a result of the sharp reduction of space available for dog walking at the nearby Crissy Field and other GGNRA sites due to increased restrictions on dog walking mandated in DEIS. The DEIS should be changed to analyze the above effects, and the DEIS should be changed to continue to allow off leash dog play on the northern section of the beach while requiring on leash walking in the more heavily used areas down from the parking lots.

c) Fort Funston: The DEIS continues to permit dogs to have off leash play in the area immediately north of the parking lot, as well as off leash play on a section of the beach below. Dogs will be required to be on leash in the rest of the site. Comment: The DEIS fails to provide scientific support for the drastic reduction in off leash play areas and fails to take into account the negative effects from the massive reduction in off leash dog play areas. The DEIS should address the following: i The area designated for off leash play near the parking lot is a small fraction of the former off leash play area. Severe overcrowding will result, with conflicts, damage to overcrowded area, and strong incentives for dog walkers to cheat in leash required areas. Comment: The DEIS should be changed to:

? provide more fenced in area for wildlife habitat, for equestrian trails and for protection of dogs at edge of bluffs, while continuing to provide additional off leash play areas. The DEIS fails to support claim that fencing will impede wildlife and will affect view.

? Take into account that many cannot make difficult walk up and down

steep, sandy trail to access beach. These folks are forced to rely on small off leash play area near parking lot.

d) Ocean Beach: The Plan calls for providing an off leash play area on a portion of the beach and banning dogs from the remainder of the beach which is a Wildlife Protection Area.

5) Proposed Compliance/Enforcement Approach Fails to Engage Responsible Dog Walkers and Will Fail to Eliminate Major Dog Walking Problems:

Current Situation: Currently the NPS approach to managing dog walking is heavily focused on enforcing leash law restrictions. This approach is consistent with NPS policy and practice in virtually all other national parks where dogs (if allowed at all) must be kept on leash and must be confined to highly limited areas within the given park. NPS staff including rangers and park police are heavily imbued with the NPS culture that a well behaved dog is one that is on leash, on paved surfaces, and not permitted on trails or beaches or in visitor centers, historic buildings, etc. a.) The DEIS on page 282 states: "Violations are handled using a reasonable enforcement response. Responses can range from a verbal or written warning, relying on education and deterrence to gain compliance, to written citations, up to custodial arrests as appropriate. LE officers are sensitive to the potential for confusion on the part of the general public and therefore make an effort to achieve compliance through educational contacts."

Comment: The DEIS fails to accurately characterize the approach of many LE officers to enforcement of leash law violations. In the cases that I have observed, LE officers have displayed anger and frustration from the outset of the encounter, despite the fact that the dogs/dog walkers were behaving in a completely appropriate manner while off leash. In two situations the officers approached yelling that dogs should be on leash, despite the reasonable expectation on the part of the dog walker that leashes were not required. Police then demanded identification, dismissed the dog walkers' explanation for why the dog was off leash, and issued a warning in a grudging manner. There was no acknowledgement on the part of the officer that the dog/dog walker was fully compliant with other regulations (i.e., staying out of restricted areas, not harassing wildlife, not bothering other visitors, not leaving pet waste behind.). The result is an angry and defiant dog walker, not more compliance.

? A much better approach would be to approach quietly, ask that dog be placed on leash, explain reasoning for this request; issue verbal or written warning with note of possible ticket in future but compliment dog walker on well behaved dog.

? I know that Park Rangers/Police can handle the public appropriately. When visiting Yellowstone last fall (without my dog), I had an extremely impressive experience with a Park official. Yellowstone is an area where Police/Rangers have their patience tried by difficult interactions with the public, yet this Officer at the end of the season still had a cheerful, positive manner with us. We had stopped on the road early one misty morning behind another car to watch a mother grizzly with her two cubs very near the side of the road. We had our car lights with flashers on and we were inside the car but we had not moved up to a pullout. The official stopped in his car, recognized that we were not blocking traffic, we were not harassing the bears and that we were fascinated by the bears. He started by acknowledging that it was a wonderful opportunity; he said take a couple more pictures, and then please move a little up the road to a pullout just on the left and stay by your car. We were completely won over with this approach.

b.)Compliance-Based Management Strategy: For future enforcement , the DEIS provides for monitoring of compliance by Park Service personnel who will count number of violations (including leash law violations) with a compliance level below 75% triggering further restrictions. Each site will be monitored over a twelve month period, and the number of violations recorded will be measured against the number of dogs walked to determine whether the 75% compliance ratio has been met. If the level is below 75%, more restrictive measures will be put in place. Given the dramatic change to current conditions lack of outreach to dog walkers and difficult for dog walkers to observe new restrictions for variety of reasons, as well as clear preference by Park Service for further reduction of dog activity, there is strong possibility that a "lack of compliance" finding will be made and it will trigger additional restrictions.

Comment: The DEIS in the Compliance-Based Management Strategy fails to provide a workable, effective plan for solving major dog walking issues in the GGNRA, as indicated by the following- Please address: i.The vast majority of dog walkers (individual and commercial) work hard to make sure dogs do not leave waste behind, do not disturb environment/wildlife, and do not disturb visitors. If compliance drops to 74% (including innocuous leash law violations) as measured by park service personnel, then the vast majority of dog walkers complying with plan would still be punished severely for failure of minority to observe new rules. ii.The DEIS has no detailed plan for outreach and education about new rules for dog walkers. Since the DEIS does not know where dog walkers are coming from or how many there are, it is hard to create a plan.

iii The new rules will be inherently difficult for dog walkers to follow, leading to inadvertent violations of dog rules. For example, at Crissy Field, Airfield will be divided into on and off leash areas but there will be no easy

way for dog walkers to see and observe boundaries.

Comment: The Compliance-Based Management Strategy should be removed from the DEIS. It should be replaced with a strategy that rewards responsible dog walkers and bans irresponsible dog walkers, as follows:

i. Set up a permit/color tag system that would be partnered with local Animal Care and Control Departments. Dogs that have licenses from local ACC could be issued a permit, renewable annually, to walk in GGNRA sites. A small fee could be charged to help pay for processing. This would help with getting dogs licensed locally and support GGNRA efforts as well. A brightly colored collar tag for dog and ID for owner could be provided and required for visits to GGNRA. Only dogs/dog walkers with these permits would be able to use off leash play areas, as well as on leash areas. Dog walkers/dogs visiting for one day could obtain one day only permit from Gift Shops and Ranger Stations with different color tag allowing them on leash only access to GGNRA sites. Failure to observe restrictions would result in loss of permit for dog walking in GGNRA.

ii. Provide a tip hot line for dog walkers to call in to report those chronic offenders in terms of leaving pet waste, disturbing habitat and wildlife, etc. The Park Service personnel would be better able to focus efforts on dealing with chronic offenders.

6) Public Outreach and Education Lacking: In the Executive Summary on pages i-ii, the six Objectives of the DEIS are stated and include one Objective related to public education as follows: Education ? Build community support for the plan to maximize management of dog walking use ? Increase public understanding of NPS policies

Comment: The DEIS does not fulfill this objective since there is no substantive plan in the few pages discussing education in the DEIS. The DEIS should address the lack of a plan and the lack of current outreach to dog walkers and other members of the public at GGNRA sites currently, as follows:

? The Park Service currently has no meaningful presence outdoors in the recreational areas at the GGNRA sites in San Francisco

? During my many hours spent walking in GGNRA sites the only Park Service personnel I see on a regular basis are maintenance workers driving their trucks along promenades and roads to empty garbage cans. ? Upon rare occasions I also see Park Police who are typically driving their patrol cars on Promenades used by dog walkers, bikers, walkers, etc. ? In five years I have seen fewer than five park service staff/ranger ? Volunteers are few and not well trained to deal with the public ? In encounters with volunteers they

have not been able to speak to progress on Snowy Plovers recovery or even type of assistance provided by State on recovery effort, such as requiring leashes on state beaches.

7.) Making Dogs and Dog Walkers Scapegoats for a Variety of Environmental, Health and Safety and Social Issues:

There are certainly issues to be addressed with a large number of dogs in the parks, including: impact on wildlife and habitats; aggression from some dogs; proper disposal of pet waste; fear of dogs on part of some visitors. While these are appropriate and legitimate issues, to make exaggerated and unsupported claims about negative effects from dogs and dog walkers is unfair to dogs; exacerbates alarm among public about dogs; and takes focus away from the real risks and problems from non-dog factors that need to be addressed.

Comment: The DEIS fails to provide scientific support, evidence and documentation for alleged material adverse effects from dogs and dog walking as shown in following examples, The DEIS should be revised to eliminate unsupported allegations and to put any effects into context with any other, more substantive factors, including but not limited to the following:

Water Quality: The Crissy Field tidal marsh (totaling 18 acres) together with adjacent grassy Airfield and dunes were part of a restoration of 100 acres at Crissy Field beginning in 1997 under the direction of the Park Service. According to the EIS "water quality monitoring of the marsh was conducted from 2000 through 2004. This monitoring revealed water quality issues in the marsh, including low dissolved oxygen levels (NPS 2006h, 16). Currently, the eastern third of Crissy Airfield., which drains into the Crissy Marsh, receives a moderate to high level of use by off-leash dogs and a substantial amount of pet waste." Comment: The DEIS fails to provide evidence for the attribution of poor water quality in the tidal marsh to pet waste in the eastern portion of the Airfield. The DEIS should remove the sentence regarding pet waste from this section and should address the following factors as more likely sources of poor water quality and low oxygen levels in the tidal marsh: ? Tidal marshes depend on daily tidal surges to reinvigorate the marsh (as explained in graphics near the tidal marsh). The Crissy Field "tidal marsh" does not benefit from the tidal effects because the inlet to the Bay is often closed for long periods of time, due to local conditions and, apparently, to failure by the Park Service to follow recommendations from designers on appropriate size for the marsh (minimum 30 acres versus actual 18 acres built). As a result, the shallow marsh tends to be stagnant and water quality becomes poor.

? The grassy Airfield is flat, covered with a thick coating of grass. After

heavy rain the Airfield is characterized by significant amounts of boggy ground and standing water, suggesting it is not draining anywhere. In any case, the Park Service oversaw design and construction of the Airfield in 1997, so why did they have it drain into the marsh?

? The grassy Airfield abuts the marsh on one end, representing less than 20% of the shoreline of the marsh. Along the long edges of the marsh accounting for at least 60% of the shoreline are Mason street on one side and the Golden Gate Promenade on the other side. There are drains (8-10) along the promenade that take runoff into the marsh from the promenade during rain. (I have seen them with water flowing through during a rainstorm.) There are also two culverts on the Mason Street side of the marsh that appear to allow run-off from somewhere up in the Presidio. Contaminants are likely coming from these other sources rather than the Airfield.

? There is vegetation around the marsh and there are significant numbers of birds in the marsh'all of these create material (decaying vegetation and bird "poop") that can directly affect water quality, leading to low oxygen levels if water is stagnant.

? There is no evidence or documentation for the "substantial" amount of pet waste claimed (As a person who walks the Airfield on a weekly basis with my dog, I personally have not observed substantial pet waste and I have not observed any dog walker leaving pet waste.). Dog walkers at Crissy Field are typically responsible about picking up pet waste. Ironically, in another section of the DEIS, the smell of dog waste deposited in garbage bins is cited as a problem for visitors, suggesting that dog walkers are in fact picking up pet waste and depositing it in garbage bins.

? Soundscape:

The DEIS states: "The natural sounds heard in the GGNRA are a positive and valued park resource, as well as an important component of the visitor experience, which dog presence or barking may interrupt. ... Potential disturbances from barking dogs may change the natural character of the area and the overall visitor experience." Comment: The DEIS has no evidence to support the above statement, and the DEIS fails to take into account the urban environment of the GGNRA site. The DEIS should be revised to reflect the following:

? For the most part, dogs walking or playing do not bark, and at Crissy Field a stroll along the Promenade or down the Central Beach will show that barking is very limited. Dog barking is a small fraction of the urban sounds heard at these sites. The visitor is far more likely to hear human verbalizations and other sounds from human activity unrelated to dog

walking.

? The sites are all within a very busy urban area so there are many urban sounds heard that compete with the "natural sounds." Sounds regularly heard include: ? Cars, motorcycles, radios, sirens from emergency vehicles ? park maintenance vehicles and park police vehicles ? Bicycles, runners, windsurfers sails and equipment, horses ? People talking and yelling, children screaming ? Planes overhead and Coast Guard and other helicopters ? Fog horns and ship horns ? Construction sounds from Doyle drive and elsewhere ? Back hoe used to clear tidal marsh inlet and run-off outlet in Crissy WPA ? Sound of gunfire at Ft Funston from shooting range

? Environmental Justice:

The DEIS states: "Some ethnic or low-income populations may be more negatively affected by off-leash dog walking." Comment: The DEIS fails to characterize accurately the reasons for low visitation rates to national parks by minorities.. The DEIS should be changed to take into account the following: ? The problem of low visitation rates by ethnic and low- income populations to national parks has been identified in a number of studies. For a survey of the literature, see "Rocky Mountain National Park: History and Meanings as Constraints to African-American Park Visitation, 2001, Elizabeth B. Erickson." The DEIS should address the 1997 studies on low minority visitation to six national parks conducted by the NPS. Since these other parks are all subject to the very strict control of dogs by Park Service policy, dogs are NOT a factor in low visitation. To imply that dogs are the problem keeping away visitors from GGNRA sites is not helping to deal with the real factors discouraging their presence. The DEIS should be revised to reflect the NPS data on low visitation by minorities to other national parks.

o Sources cited in support of DEIS statement include a phone survey by Northern Arizona University (NAU), as well as a small study done by San Francisco State (SFS). Comment: The DEIS fails to characterize accurately the results of the NAU survey and the relevance of the SFS study, and the DEIS should be revised to reflect the following:

? On p. 1404 the DEIS, referring to the NAU survey, states: " 41% of those who had taken dogs for a walk at GGNRA were racial minorities" The San Francisco State study was done with only 100 respondents and most were unfamiliar with GGNRA sites.

? Cultural Resources:

With regard to the U.S. Coast Guard Station at Crissy Field, the DEIS states: "In the past some of the individual juniper plantings within the U.S. Coast

Guard Station's perimeter hedge have died and dog urine is believed to have contributed to the loss of at least one plant." Comment: The DEIS fails to establish the materiality of one plant, the cause of death of one plant, and the relevance of one plant as a "cultural resource." The DEIS should be revised to remove the above reference entirely based on the following:

? The hedge is newly planted to replace the historic cypress hedge planted in 1915 that needed to be replaced due to age and effects of nearby remediation and renovation of Airfield, etc. The new plantings, particularly one plant, hardly fit into definition of a "cultural resource."

? Since more than one plant died, there were other factors at work than simply dog urine which is only cited as a possible contributing factor in the death of one plant.

? One of the buildings of the Coast Guard Station adjacent to the hedge has paint peeling down to the wood due to the weather effects that is a much more material problem with this cultural icon.

? There is ample evidence of "wear and tear" on grounds and facilities throughout the GGNRA lands due to the high level of use by people engaged in a variety of activities in this urban environment. The possible loss of one plant from dog urine should more appropriately be included in the general maintenance requirements for the area.

Aesthetics: The DEIS fails to document and to characterize accurately the impact of dog waste and pet urine on aesthetics, as follows:

"Dog waste can be found scattered throughout the high use dog walking areas ... the associated smell[of dog urine] can be very strong on hot summer days" Comment: The DEIS fails to provide any evidence or documentation for the above statement. The DEIS also fails to account for the lack of hot summer days in the GGNRA lands, based on the fact that San Francisco on average has only 28 days where temperatures are over 78 degrees Fahrenheit.

Areas of Conceptual Agreement and Disagreement with the Proposed Dog Plan:

? A dog plan should provide for a variety of users involved in different types of activities based on type of activity and extent of use. o Obtaining good data on actual number of visitors and breakdown on type of activity is critical to achieving appropriate allocation between users. o Consideration should be given to seasonal/weather/day of week/time of day patterns of use as well as spatial differences in patterns of use.

? A dog plan should require on leash walking in shared areas of high levels of activity by all user groups o Parking lots, promenades (e.g. Crissy Field), picnic areas should require on leash dog walking o A dog plan should require on leash dog walking in areas with more traditional "park type" settings more likely to have elderly, small children and strollers, etc (e.g. Sutro Heights) o A dog plan should prohibit dogs from entering historic buildings, visitor centers, etc.

? A dog plan should prohibit all dogs from entering Wildlife (snowy plover) Protection Areas (WPA) o The Plan provides for allocating at least half of all available beach space in San Francisco to Wildlife Protection areas and proposes to ban dogs from these areas o The WPA together with leash restrictions on all California beaches provides substantial habitat for all shore birds including Snowy Plover. o Since Human disturbance is also a factor in declining shorebird/Snowy Plover populations, a portion of the WPA on each of the GGNRA beaches should also ban people without dogs.

? A dog plan should have designated off leash play areas in areas o Off leash play areas should be large enough to accommodate number of dogs to avoid habitat destructions and minimize overcrowding and resultant conflicts o Off leash play areas should be segregated with easily seen, understood and manageable boundaries Aesthetics: The DEIS fails to document and to characterize accurately the impact of dog waste and pet urine on aesthetics, as follows:

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? A dog plan should look at inherent conflicts in activities between user groups and as much as possible segregate those groups. Unfortunately, under the Plan, dog walkers are often forced to use the same trails as mountain bikers and equestrians. - Bikers, particularly, mountain bikers can present significant hazards to dog walkers particularly when there is a group of bikers and/or a group of dogs -Horses can present a significant hazard to dog walkers particularly when there is a group of horses or group of dogs

Correspondence ID: 1851 **Project:** 11759 **Document:** 38106

Received: Apr,04,2011 14:43:53

Correspondence Type: Web Form

Correspondence: I have been involved in these discussions as a member of the community for the past few years, and find it incredibly frustrating that the GGNRA continues to completely ignore the wishes of dog owners in their deliberations. It is almost a farce that you are once again asking for comments, when from the beginning the intent has been to ban or significantly restrict dogs in the GGNRA areas no matter what the majority wants. I am sure if this was San Francisco land and was put to a vote in an election, it would result in much greater freedom for dogs

I completely support creating areas for individuals who don't want to be around dogs. But does that mean that all areas have to be essentially off limits to owners and their dogs, or that all areas have to go to on-leash restrictions? I have walked my two dogs at Baker beach for years, and never

seen any instances of dogs harassing individuals. So why can't the GGNRA create restrictions such as follows, using Baker Beach as an example:

1) Split the Baker beach as suggested, but in the areas where dogs are allowed, at least let that area be a leash or voice control (aka off-leash) area. I do find it humorous that you are forcing the dog owners, many of whom have children, into the area where the nudists are allowed. 2) OR, make certain beaches available to dog owners before 10 am or after 4 pm, during the times that dogs are allowed let those areas be voice control areas so dogs can run free.

I am not sure why I am even writing this as the GGNRA has been deaf to the requests and efforts by the dog owners since the beginning. I do know if these recommendations go forward as-is, I won't be giving any more money to the GGNRA or National Parks, when I used to give quite a bit.

Correspondence ID: 1852 **Project:** 11759 **Document:** 38106
Received: Apr,04,2011 20:51:06
Correspondence Type: Web Form
Correspondence: The GGNRA severe limits to on- and off-leash dog walking recreation is bad due to:

1. If people are not given a reasonable amount of area to take their dogs off-leash, they will take them everywhere. If given reasonable space, most people will prefer to not break the law and stick to those confines. This will help to keep dogs out of sensitive environmental habitat and give people afraid of dogs a greater assurance of not running in to them.

2. The entire plan views dogs from a negative perspective...what "dogs could or may do" is used over and over again. The research about dogs "will" do is not there. The plan doesn't include that dogs have been shown to help keep predators, such as ravens and raccoons, away that kill endangered species.

3. The plan does not look at the impact of people alone to the environment vs. people with dogs.

4. The plan does not take into account the needs of handicapped people.

5. The plan does not take into account the safety dogs provide, especially for single women.

6. The plan does not take into account the economical boost that dog-

friendly areas have by drawing in tourists, i.e. Carmel.

7. Dog walking is important to many people's physical and mental health. It provides life-long exercise. It is as important to more people and better for the environment than other outdoor recreation, such as golf courses, tennis courts and football, baseball or soccer fields that our taxes support.

8. San Mateo County only allows off-leash dog walking on a third of a mile of Pulgas Ridge and an inaccessible and dangerous beach. The GGNRA is currently the only entity that could change this.

9. Dog walking is important in bringing divergent cultures together to make a single community.

Correspondence ID: 1853 **Project:** 11759 **Document:** 38106

Received: Apr,04,2011 22:54:43

Correspondence Type: Web Form

Correspondence: I favor alternative D in all cases.

I have just one variance. I favor allowing off-leash dogs at East Beach at Crissy Field and restricting them to leashes along the promenade and anywhere west of the promenade bridge. There is very little native presence at East Beach, but plenty of it west of the bridge -- those are the areas that need to be protected.

Correspondence ID: 1854 **Project:** 11759 **Document:** 38106

Received: Apr,04,2011 23:55:33

Correspondence Type: Web Form

Correspondence: The proposed preferred alternative would be a drastic measure that takes away valued freedoms from an entire class of residents and visitors-people who have dogs. I would like to make a couple of points in opposition to the preferred alternative, as well as any alternative that bans on-leash dog walking in these areas. *In an urban environment, having access to open spaces is healthy for dogs and the people that walk them. A lot of people exercise more than they otherwise would by walking and playing with their dogs, a huge contribution to a healthy society. The dogs benefit from being able to run and fetch because they get more exercise than they would on a leash, making the dogs happier, mellower and less likely to be aggressive or destructive. *On the point of limited off-leash access for the safety of others, consider this: People who have aggressive dogs or who don't control their dogs will just walk their dogs elsewhere, perhaps in even more confined spaces where there is less distance between their dogs and other

people/dogs. The solution here is not limiting places people can walk their dogs off-leash, but rather imposing stricter penalties on people who don't control their dogs and cause injury to other people, regardless of whether they are in the GGNRA or not. These accidents can happen anywhere because the owners are irresponsible. Restricting access punishes a lot of people who have well-behaved, non-aggressive dogs. *On the point of environmental impact: The more time people spend in the GGNRA, the more they will feel compelled to protect it in the future. Limiting access to people with dogs will alienate dog owners, a large percentage of the population, whose support may be needed in the future. Wildlife Protection Areas have already been established to protect the most sensitive habitats. To truly protect the larger areas and make an impact, you would need to limit access to all humans, not just humans with dogs. Irresponsible people, whether they have dogs or not, negatively impact the environment. Although some people litter, we are not proposing a ban on people in the GGNRA. But some alternatives in this plan ban dogs entirely from large areas. *The GGNRA is an area that draws visitors and residents to the Bay Area. Keeping a large portion of these areas as dog friendly as possible means we will continue attracting visitors and residents, which in turn keeps our economy strong. Dogs are part of people's families so, for some, this is the equivalent of telling them they can't bring their kids to the park or can't let their kids run around.

Correspondence ID: 1855 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 00:25:48

Correspondence Type: Web Form

Correspondence: GGNRA stands for recreation. Dogs are the major happiness factor for many urban dwellers including single people as well as the elderly, the disabled, the lonely, and the empty-nesters. These dogs need to run and socialize in order to be healthy, well adjusted, and safe. Many, if not most, urban living people do not have access to large spaces other than the GGNRA to accomplish this. High energy dogs need to exercise far more than many of these people are capable of doing on leash, especially our growing numbers of elderly and handicapped citizens. Without adequate exercise and socialization opportunities, some people will have to give up their animals and others will find their dogs less calm and harder to handle. Dogs ARE our recreation. We want to continue the partnership with them that we have enjoyed for years. The quality of life of our dogs and our people will suffer greatly if off-leash play is banned. Do not pass that restriction. Follow your mandate for recreation. Keep our dogs and people healthy.

Correspondence ID: 1856 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 02:48:56

Correspondence Web Form

Type:

Correspondence: I have had many conflicts (on the brink of violence) with many many dog walkers in San Francisco (marina green, ocean beach, fort point) and in the marin headlands. I have stayed away from some very attractive areas of San Francisco due to overly aggressive dog owners (lands end, fort funston, lake merced, the presidio). I feel that the preferred alternative is a reasonable compromise but anything that allows for more off leash dog areas than proposed in the preferred alternative would not be acceptable to me.

Correspondence ID: 1857 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 06:41:04

Correspondence Web Form

Type:

Correspondence: Please keep ggnra areas off leash. Our dogs need off leash exercise and dog walkers need to remain employed. I have enjoyed these areas responsibly with my dogs for decades. Having access to these areas remain at the top of the list for why I remain in the Bay Area. It would be an outrage to have these areas restricted in the manner proposed. Leashes will do nothing to clean up the environment. Lazy & inconsiderate dog owners are just as likely to leave a mess if their dogs are on leash as they would if the dogs were off leash. Please keep in mind that human beings are the "invasive species" here, not dogs.

Correspondence ID: 1858 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 08:22:23

Correspondence Web Form

Type:

Correspondence: I am writing to protest the GGNRA draft Dog Management Plan. This plan is unnecessary and violates the spirit that existed when San Francisco gave land to the GGNRA originally.

Currently less than 1% of the GGNRA is open to dogs, mostly requiring dogs on leash, with a very small percent of area open to off leash (mostly beaches).

Current restrictions and regulations are sufficient to enforce the regulations. The vast majority of dog owners are responsible and follow the regulations. The GGNRA has the authority to ticket and fine those who are not.

In a densely populated urban environment such as the SF Bay Area it is critical that there be places where responsible tax paying citizens can enjoy a high quality of life with there chosen canine family members. There are

actually more dogs in San Francisco than children and allowing areas for responsible on and off leash exercise is critical to maintaining that quality of life.

I urge the GGNRA to not implement the draft plan and to consider it's obligation to serving the whole community.

Thank you -

Anne Zeller

Correspondence ID: 1859 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 08:39:04

Correspondence Type: Web Form

Correspondence: I completely support the guarding of truly sensitive habitats and systems. I understand the detrimental effects of canine predator behavior and markings. I also understand that people can also wreak damage. In those areas, I support severely restricting public access of all sorts.

But how can we think about not allowing general access to the great outdoors? It's skin to metering air or sunshine. People and animals, including domesticated dogs, have a right to live, and to breathe and to run, for pete's sake. This should be the default position of the management policies. It really seems that the current proposal is starting from the other end.

Because we are here in numbers, we've got to find ways of reining in offensive behavior, yes. So, yes, that may require more management to enforce actions against dog owners who are not controlling aggressive dogs nor cleaning up after them. Same thinking applies to drunkards and litterers.

There are complaints by members of the non-dog-owning public who dislike stepping in feces. That's a legitimate complaint; the source of the problem is not the dogs themselves. It's not legitimate therefore to remove them. (and one can hardly ban wild creatures from defecating, huh?). It's proper to deal with the folks who have failed to clean up after their animals.

Complaints about disliking dogs, being allergic to them, being frightened by them, run the gamut from legitimate to foolish. Those should not all be given equal weight. Sometimes people are attacked by dogs. Sometimes people are attacked by other people, or bugs, or snakes, or.....please let us act like reasonable adults who understand where the center of the universe lies.

Correspondence ID: 1860 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 08:58:39

Correspondence Type: Web Form

Correspondence: Off-leash areas at parks and outdoor spaces are critical to the health of the canine population in an urban environment.

As a recent dog owner (1 month) and park runner I can comment of both sides of the argument. For over 3 years I have ran through parks with off-leash areas specifically to see the dogs and have not had a single bad incident due to unruly animals or pet "messes." I find it the exact opposite in San Francisco and specifically in my neighborhood where I have to watch out for canine feces on the neighborhood sidewalks as I run a walk. Owners that bring their dogs to parks seem to be much more responsible and that has not been a problem in those locations.

As a dog owner my wife and I have recently began bringing our 2 year old pug to off-lease park areas on a regular basis. Duboce Park, Fort Funston Park, GG Park and Chrissy Fields are our regular spots. We look forward to our time in these locations with our dog running for exercise since he is often stuck in the house while we work. We only get positive remarks and smiles with our pug off-lease even though he can be known as a "picnic crasher" as visits people relaxing on blankets and walking about.

The park at Fort Funston is one of those defining features of San Francisco for dog owners and those without alike. This park is unique in the level of freedom we can let the dog have - specifically on the beach where we don't need to worry about street traffic. The views and natural beauty are amazing features and I would hate to restrain a dog in this environment.

In summary, I request and recommend that off-lease policies not be impacted but rather address the direct concerns of dog feces and environmental damage with stiff fines for violators. Both issues can not be corrected by leashing a dog so let's correct the behavior of the irresponsible minority by citing violators.

Thanks for the time and review of my comments.

Sincerely,

Jeff Terlizzi

Correspondence ID: 1861 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 09:46:04

Correspondence Web Form

Type:

Correspondence: I feel that this plan is overly-restrictive and represents a major departure from the current, balanced use of the park. Currently, off-lead areas are restricted to less than 1% of park land. I am a responsible dog owner, my dog is a volunteer with the SPCA Puppy Dog Tails and Assisted Therapy programs. When we finish volunteering I love to take him somewhere without restrictions, where he can run on the beach or around the trails where allowed. He deserves this after behaving so well for people in need.

If this were to be taken away, what then? Did you know that Seeing Eye Dogs have a 3 year service lifetime- because they get overtaxed and just can't perform anymore? When dogs are restricted too much, they cannot be good pets or service animals. The 1% os space they are allowed, in areas like Chrissy field where the wildlife areas are fenced off, does not represent a threat to wildlife. In areas where you disagree, there should be similar fences added to keep dogs off sensitive areas. I am sure dog owners would be willing to fundraise to provide these fences.

We recognize there are owners whom we would like to be more responsible with their dogs. But they are few in number ? incidents involving dogs in GGNRA are less than 4% of all incidents in the park. Penalizing all dog owners for the behavior of a truly small minority is not the right approach. You penalize the dogs, too, and some dogs really need the freedom.

Regards,

Candace Bagley

Correspondence ID: 1862 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 10:03:37

Correspondence Type: Web Form

Correspondence: Howdy,

I have lived in San Francisco for over 25 years and have always enjoyed the recreational opportunities as I like to hike and surf and just walk. I bought a dog 5 years ago so my son could grow up with a companion. My son is now in University and the dog is my close companion. We walk OFF LEASH every day mostly at Baker Beach or at Crissy Field. We have good friends among fellow dog walkers and non-dog walkers alike. When the weather is nice we share our walks with everyone on the beach, the very young , the young, the old and every age in-between. When the weather is not so nice we are still there and usually it is only the dog walkers that are there. People love watching my dog catch his frisbee and frolic in the water. We have

brought lots of smiles to lots of people. Dogs came over on the Mayflower and have been part of the American fabric of life ever since. Please do not take away our off leash areas. All of your plans are negative and will cost you/us even more money to enforce. Let the dog organizations help you craft a positive solution to your "supposed problem" with dogs in the GGNRecreationA. The NPS has a unique opportunity to find a solution that works for ALL of us. The world is full of pressing problems that demand our attention, don't derail people from concentrating on real problems. Sincerely, David Caldwell, dog owner, bird watcher, environmentalist

Correspondence ID: 1863 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 11:50:31

Correspondence Type: Web Form

Correspondence: This proposal severely limits dog walking (even on leash). This city and the users of this park are historically very dog-friendly; even visitors from out of town bring their dogs to this park. Not only does this proposal remove something that all the dog-owning residents here love, it limits tourism. Sufficient off-leash and walking areas provide a large benefit for the welfare of our family member dogs and our neighbors: the animals are happier, less anxious and more trainable. Ultimately it contributes to a safer city environment, which everyone wants.

The dog owners here are for the most part responsible dog owners that keep the dogs trained, healthy, and pick up after them. Irresponsible dog owners-a small minority-can be dealt with under the law, without destroying access for the conscientious majority.

Correspondence ID: 1864 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 12:27:08

Correspondence Type: Web Form

Correspondence: BELOW IS AN ARTICLE WRITTEN BY DR. JENNIFER SCARLETT, DVM. I AM SUBMITTING IT BECAUSE IT REFLECTS MY FEELINGS IN A WELL WRITTEN, PROFESSIONAL WAY.

MY HUSBAND AND I ARE, SADLY, CHILDLESS AT THIS TIME. OUR DOG IS NOT OUR CHILD BUT SHE IS SOMETHING WE LOVE, SHARE AND WE BOTH ARE COMMITTED TO HER WELL-BEING. THROUGH OUR DAILY OUTINGS WITH HER WE HAVE MET MANY OF OUR CURRENT CLOSE FRIENDS. HER DAILY OFF-LEASH EXERCISE GIVES US OUR DAILY EXERCISE AND DOSE OF

FRESH AIR.

I AM ALL FOR LEGAL ACTION BEING TAKEN AGAINST IRRESPONSIBLE DOG OWNERS AND DOG WALKERS. BUT I DO NOT WANT THE RESPONSIBLE DOG OWNERS AND DOG WALKERS TO BE JEOPARDIZED FOR THE THOUGHTLESS ACTIONS OF OTHERS.

PLEASE READ THE ARTICLE BELOW AND KNOW THAT DR. JENNIFER SCARLETT SPEAKS NOT ONLY FOR ME BUT FOR MANY OTHER DOG OWNERS, DOG AND ANIMAL LOVERS.

THANK YOU.

We city dwellers cherish variety. San Francisco is a kaleidoscope of people, viewpoints, geography, architecture, and activities. But our community is also densely populated, which can put our live-and-let-live to the test. I get around town by foot or bicycle, and at least once a week some motorist threatens my Zen (or my life). Drivers probably say the same about me and my bike. If you're not a dog person, perhaps you've had issues with your canine neighbors, or they with you.

Still, it shouldn't be too hard to find space for everybody in our great big living room. Today I'm thinking about how to make sure that people and their dogs have places to romp around outdoors.

That's the problem with the preferred proposal by the Golden Gate National Recreation Area (GGNRA), which wants to drastically limit the areas where people can bring their dogs. Currently less than 1 percent of the parkland is now available for off-lead activity, yet the proposal would not only reduce that space but could forbid even leashed dogs in some places people love to visit. Any new lands added to GGNRA, under this proposal, would prohibit dog walking (even leashed) by default, unless a specific exception was made.

Neighborliness works better than drawing up battle lines. It's not a question of pet owners vs. non-pet owners, hikers vs. walkers, or any other oversimplified interest group. Our shared space is exactly that-shared. There's room for everybody, within reason, and within balance.

Census data show that there are more dogs than children in San Francisco, but again, it's never either/or. This city has always recognized and embraced animal companionship. For many of our citizens, their pet companions are family.

The GGNRA Draft Dog Management Plan, released in January, is a major

departure from the established, balanced use of parklands that's prevailed here for forty years. Vastly reducing the off-leash areas in GGNRA would harm the quality of life of tens of thousands of dog guardians and, of course, the behavioral health of their dogs.

Dogs get the same benefits as people from playing outside. Companionship and exercise shape both dogs and owners into healthier, better urbanites. As a veterinarian, I know how vital it is that dogs have off-leash exercise and play time. You get a big payoff: the animals are happier, less anxious and more trainable. Ultimately it contributes to a safer city environment, which everyone wants.

The San Francisco Board of Supervisors understood the need for dog guardians to enjoy the outdoors with their companions when they made land available to GGNRA, and cited it specifically. So the Draft Plan's claim that "the quality of urban areas is not a significant factor in determining a dog management plan" violates the spirit under which GGNRA was created. I also fear that restricting dog-friendly spaces would discourage dog adoptions, not only subverting our animal-welfare goals but also threatening the ability of shelters such as the SF SPCA to continue rescuing dogs.

Responsible dog owners deserve continued access to GGNRA lands. And most owners are responsible: they scoop poop, control their dogs, keep them out of restricted or environmentally sensitive areas (the GGNRA draft environmental impact statement showed no direct link between dog walking and any environmental damage), and carry a leash for when others are uncomfortable with free-range dogs. They also take advantage of the many high-quality, low-cost training classes offered in their community.

Irresponsible dog owners-a small minority-can be dealt with under the law, without destroying access for the conscientious majority.

Urban recreation is a unique proposition, and those who manage a place like GGNRA have to mesh the diverse interests of a diverse clientele in a crowded world. People-all kinds of people-belong there. Thousands of your dog-owning neighbors have behaved themselves in GGNRA lands for decades, and I urge you to support the efforts to save this precious resource.

Correspondence ID: 1865 **Project:** 11759 **Document:** 38106
Received: Apr,05,2011 16:54:39
Correspondence Type: Web Form
Correspondence: I support the plan! I see that a couple of weeks ago, the "dog community" conducted an all out assault against the plan. I hope that the environmentalist/conservationist/wildlife community also has a say.

Correspondence ID: 1866 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 17:33:11

Correspondence Type: Web Form

Correspondence: To whom it may concern, Please keep our national parks open to all . Dogs need open space to exercise and socialize just like humans do, and it is unfair to restrict these areas from them and their owners.

Thank-you for your time and consideration ,

Best- Alison Lufkin

Correspondence ID: 1867 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 21:27:36

Correspondence Type: Web Form

Correspondence: The majority of the population either owns dogs or wishes they could own dogs.

Many dog lovers who don't currently have a dog even go to dog parks to get "dog fixes" or dog loving while they are in a place in their lives where they cannot commit to the dedication that being a responsible dog parent requires.

Dogs, like children, can't be left at home alone all the time. Dogs who are not exercised a lot get psychological problems and become "problem dogs", becoming a noise nuisance for their neighbors, frequently becoming neurotic, and even becoming aggressive. Dogs need large places where they can get out and really run, as well as places where they can be social with other dogs and with new people. If dogs don't constantly interact with new people and new dogs, they stop being social and friendly and can become unfriendly and aggressive. Responsible dog parents are constantly looking for opportunities to keep their dogs social and friendly, even by traveling to new parks in different cities, when they can, to keep their dogs from becoming problems. Currently, it is difficult enough being a responsible dog parent. There are very few places where we can legally go with our dogs. Please don't take away more parks. Parks shouldn't be an us or them situation. Parks are for sharing with everyone! Even if that does mean that we all have to put up with people who don't take good care of their children.

Making more parks off-limits just makes life harder for the majority of the population. If you do this, the number of complaints of problem dogs will go up all across the city because people will have even less opportunities to

be responsible dog owners. (Irresponsible dog owners don't pay that much attention to the laws, so removing more dog usable parks won't have that much effect on them...)

I visit San Francisco frequently. Since it is a long drive for me I always have to have my dog with me since I can't leave her at home alone for that long and I can't afford to hire a dogsitter all the time. It is difficult enough finding places where she can get some energy out in a city that I am visiting, please don't make it more difficult for us tourists to come for a visit! I would really hate not being able to visit my favorite stores and restaurants because it is too difficult to care for my dog between shopping!

Sincerely, Jessie's mom, Autumn

P.S. However, if you want to start requiring Canine Good Citizen Certificates (CGC Certificates) in order to use parks, that is reasonable. All good dog parents prefer their dogs to be interacting with other well mannered dogs (just as good parents want their children to be interacting with "good" kids). Also, dogs and their parents who have worked their way through the CGC testing know how to interact with other people and other dogs, and by getting the CGC Certificate they have shown an interest in making certain that their dog is well mannered and courteous to people and other dogs.

Correspondence ID: 1868 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 22:33:19

Correspondence Type: Web Form

Correspondence: My fiance and I have two dogs, one adopted from the SFSPCA and the other from the Marin Humane Society. My fiance and I met at Alta Plaza Park, after our dogs became best buddies upon first sight. We are both extremely responsible dog owners as well as tax-paying, law abiding citizens of this city (and the United States). I was thinking quite seriously about moving back to the East Coast (where I grew up) after living in the Bay Area for the majority of the last decade, but then I adopted my dog, and this city became a place I just couldn't leave. San Francisco has always been one of the most dog-friendly cities in this country, and after adopting my dog (Sarlat), I felt like a whole new world opened up to me. People smiled at me more and talked to me, I started meeting other people in my neighborhood and becoming good friends with them. I think that dogs make this city a friendlier place. Dogs foster a sense of community here, which is often a hard thing to find when dealing with some of the day-to-day urban struggles/hardships. We meet each other at the parks and beaches, and we make doggy play dates. I also became much healthier after adopting Sarlat, losing about 20 pounds due to walking her and going on jogs with her, as

well as just playing with her at the parks and beaches in the Bay Area. I think promoting dog-ownership is a great way to help San Franciscans improve their health. There are all of the technical problems with limiting dog access and off-leash activity--which is really the only way the dogs get proper exercise and thus are relaxed at home--that I know will be presented by the SPCA and other animal rights organizations, but I want to really impress upon you the detriment to humans living in San Francisco that this Proposal would result in if passed. I will seriously consider moving to a less expensive city/town, and perhaps this would be out of the State of California, if this Proposal were to pass, and I know I'm not alone in this thinking. There are always issues with dogs, there is no question in that, but I do not think these negative issues come anywhere near the magnitude of harm that will come to the vast majority of responsible and loving dog owners of this city, or the dog lovers who just enjoy their friends' dogs, should this Proposal pass. This proposal would transform San Francisco from one of the most dog-friendly and human-happy cities into one of the most unfriendly cities in this country, and maybe even the world. The negative impact on San Francisco, should it become hostile to dogs and their owners, has not been evaluated in any significant manner, and is not something that should be haphazardly tested, which is what I believe this proposal will beget if passed. Please help keep San Franciscans happy, healthy, neighborly, and in this city, and do not pass this proposal.

Correspondence ID: 1869 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 23:28:55

Correspondence Type: Web Form

Correspondence: It disheartens me that dog walkers cannot see the other side of the "leash" so it seems. As much as I love animals, like many things human, dog-ownership and the vocation of dog-walking has gotten out of control with an often total disregard to other people and environment. I think it wise that GGNRA put clear boundaries in terms of policy and park areas to restrict if not eventually to eliminate unleashed dog-walking in major GGNRA parklands. I love animals which includes wildlife and the sensitive habitat that wildlife lives in. Dogs can destroy habitat and disturb wildlife as well as people who don't want to be disturbed by the over-abundance of dogs and their walkers. The critical point I am making is to enforce a policy that protects the land and wildlife from exceeding the land's carrying capacity. Dog-walkers who profit from walking more than three dogs at a time make an example of this. Dog-walkers who walk more than three dogs at a time are a disservice to the dogs (point of diminishing returns), the land they ruin, and people who need to have peace and quiet away from barking or nosy dogs. It not only disrupts people who enjoy peace and quiet but more importantly it disrupts the peace and calm of the land and wildlife. Lastly, dog-walkers are not always thoughtful about cleaning up their dog's waste

or having the dogs alleviate themselves in more appropriate places like their back yards. No body appreciates stinky dog urine or manure all over the place, I certainly don't. Thank you GGNRA for not allowing the land to be over-run with dogs and their walkers. Perhaps GGNRA can find a happy resolution to the needs of dog-walkers by requiring on-leash only areas or an open field for dog running.

Correspondence ID: 1870 **Project:** 11759 **Document:** 38106

Received: Apr,06,2011 00:11:11

Correspondence Type: Web Form

Correspondence: As a veterinarian, I am well aware of the importance and benefits of exercise in animals. There is a clear relationship between exercise and maintaining a healthy weight; as well as good mental stability and much less of a tendency to bark excessively or be destructive. Dogs in general are able to interact with other dogs off leash in a non-protective and friendly manner. Dogs do not run and play on the end of a leash, in the same way that they are able to off leash. In addition, once you place them on a leash, dogs are more restrictive, and can often become protective.

The San Francisco area parks and beaches provide a wide variety of areas for canines to romp, play, and be themselves. To make these areas anything other than voice control, would ruin the atmosphere that has become known as a dog lovers haven. Most pet owners do not have enough property at their home to let their dogs freely frolic in the same way that they can in a park or on a beach. People rely on these traffic free areas to be able to let their dogs exercise, play, and socialize in a safe environment. The people also enjoy visiting with other pet lovers as well. Removing these off leash areas would greatly reduce the quality of life for both the canines and their human companions.

Correspondence ID: 1871 **Project:** 11759 **Document:** 38106

Received: Apr,06,2011 12:50:56

Correspondence Type: Web Form

Correspondence: Dogs deserve open space, too.

Please do not further restrict dog access to the GGNRA.

Thank you.

Teri Hu

Correspondence ID: 1872 **Project:** 11759 **Document:** 38106

Received: Apr,06,2011 12:58:41

Correspondence Web Form

Type:

Correspondence: I hike extensively in teh Tenisee Valley GGNRA. I hike the Miwok trail and also enter the park from the end of County View Drive.

Summary: There are many great Dog owners but there are many that 1) allow their dogs to run off leash in restricted areas and 2) Leave Dog poop on the trail. 3) bag the dog poop but do not pick up the bag.

At one point in January, there were around 10-15 bags of poo at teh end of County View Drive and many scattered throughout the trail.

I think that Dogs need to be banned from open areas and restricted to limited areas of the park.

Mike

Correspondence ID: 1873 **Project:** 11759 **Document:** 38106

Received: Apr,06,2011 13:10:48

Correspondence Type: Web Form

Correspondence: I am in support of curtailing dogs' off-leash access to GGNRA as outlined in the Management Plan. This is due to the multitude of problems that I have personally witnessed in the GGNRA while dogs have been off-leash, including destruction of wildlife habitat, hunting/killing wildlife, and menacing other visitors. The fact is that even in areas where dogs are currently mandated to be on-leash, many visitors believe it is their right to allow their dogs to run wherever off-leash. This must stop if we are to stop the further destruction of the wilderness in the GGNRA.

Correspondence ID: 1874 **Project:** 11759 **Document:** 38106

Received: Apr,06,2011 15:09:45

Correspondence Type: Web Form

Correspondence: . I support the highest level of restrictions for dog access to the crucial habitat of our national parks. Will posterity blame us for prioritizing the pleasures of pet-owners over the survival of more than a dozen endangered species in the GGNRA and related areas? Will snowy plovers go extinct so that pet owners can live out their fantasy of rights and liberties?

Dogs are not endangered, and putting them on leashes in some areas and preventing them from going into others altogether is not a problem. There are plenty of places, including the city parks, for dogs. Last time I went to Ocean Beach's restricted area, I saw about a dozen off-leash dogs and then

on my way back saw the sign saying all these dogs had to be on leash. I would support stiff fines and enforcement too. So would every environmentalist on earth who actually cares about the Mission Blue or the coho in Redwood Creek.

With the rise of dogwalkers taking large groups of dogs out at once, the ability to control the dogs and keep them from widening trails is reduced, so the problem has grown worse. I have nothing against dogs. But I have everything against extinctions.

sincerely,

Rebecca Solnit

Correspondence ID: 1875 **Project:** 11759 **Document:** 38106

Received: Apr,06,2011 16:34:40

Correspondence Type: Web Form

Correspondence: I strongly oppose the severe reduction in space allocated for recreation with dogs in the GGNRA. The land was given with the understanding that it would continue to be a recreation area. Dogs are only allowed on 1% of the land as it is. I am a responsible dog owner and do not allow my dogs into fenced off areas. I pick up after them and do not allow them to bother others. I support citing irresponsible dog owners. The other parks in the city would be overwhelmed by dogs if this plan passes. Most city dwellers do not have large yards and having this space for dogs to run off-leash is key to keeping them active and well socialized. I have written to my congressional representatives and also the SF City Council to express my views. I think the land should be given back to the city if the scope of use is changed in this way. I think that there can be balance where dog owners and non dog owners can all enjoy the GGNRA.

Correspondence ID: 1876 **Project:** 11759 **Document:** 38106

Received: Apr,06,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The foot races on Crissy Field and elsewhere in the GGNRA are not only high impact, they prevent people and dogs and bikers from having access, much less enjoying, the trails which are meant for multiple use. It seems that almost every Sunday morning, once the weather is nice, there is a foot race on Crissy Field. They must bring plenty of money to the park. My guess is that the Presidio Trust promotes the permits.

Correspondence ID: 1877 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,06,2011 18:49:19

Correspondence Web Form

Type:

Correspondence: I am writing to register my opposition to the proposed ordinance restricting off-leash dog activity in the Golden Gate National Recreation Area. I am a San Francisco resident and longstanding dog owner who understands both the responsibility that dog ownership carries and the value that dogs derive from the ability to run, play and interact freely with other dogs in segregated natural spaces within the city. The natural preservation objectives of the GGNRA are not mutually exclusive with the ability of dogs to roam freely in these areas under proper owner supervision. San Francisco's long tradition of allowing dog owners to responsibly let their dogs enjoy these areas without the restriction of a leash stands as a testament to the viability of this practice. Dog owners using GGNRA overwhelmingly respect the established natural preservation boundaries that do exist, and these areas can continue to thrive as they coexist with dog-roaming areas.

Please do not curtail this privilege through the proposed legislation. Thank you for your consideration.

Correspondence 1878 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,06,2011 19:09:39

Correspondence Web Form

Type:

Correspondence: I ride my bike with my dog from Ocean Beach to North Beach daily to work and stop Crissy field 5X a week.

I am very disappointed and angered to hear that the Golden Gate Park Recreation Area is attempting to eliminate so much off leash dog area in San Francisco. As a responsible dog owner this is an attack on my rights as a dog owner and San Franciscian for 25 years. Dogs and their owners are an integral part of San Francisco and further limiting our rights to walk freely in parks is a horrible idea. I can only imagine this attack on such a large community of responsible people is a knee-jerk reaction to an irresponsible few. Why not prosecute bad dog owners instead of punishing everyone?!!!

Open space to walk my dog is one of few remaining the reasons why I like living and working in San Francisco. As a business person who has actively contributed to San Francisco's economy, I deeply condemn this proposal.

Correspondence 1879 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,06,2011 00:00:00

Correspondence Web Form

Type:**Correspondence:** April 6, 2011

My name is Virginia Hoffmann. I am a Certified Pet Dog Trainer, certified by the Certification Council for Pet Dog Trainers (www.ccpdt.org), a Certified Dog Behavior Consultant and member of The International Association of Animal Behavior Consultants (www.iaabc.org), a former AKC Canine Good Citizen Evaluator (www.akc.org), a Professional Member of the Association of Pet Dog Trainers (www.apdt.com) and have served as a licensed pet therapy team evaluator for the Delta Society (www.deltasociety.org). I have been involved with dogs for more than 30 years and working professionally with people and their dogs in New York City for 15+ years. I have been a dog owner and off leash user of Central Park in New York City for 14 years. I am strongly in favor of off leash areas for dogs. In 2007 we almost lost off leash hours in Central Park but fortunately for the dogs and people who enjoyed them for years won the case and the ability to exercise dogs off leash in the park was maintained. I am also in favor of responsible dog ownership and the safety and education of the community as it relates to the behavior of people and their dogs. I am an educator of people and their dogs. My job is about keeping people and dogs safe and compatible. I believe we are throwing the baby out with the bath water. Rather than approaching this hysterically and emotionally the facts need to be assessed. We need to consider that education is the solution to any conflict regarding dogs recreating off leash in the parks. The dog owners and the general public would benefit from education regarding dog safety both on and off leash and understanding of the statistics with regard to same. I do not consider it acceptable for a dog to harass or bite a person or another dog. Nor is it acceptable for a person to be hit by a car, rollerblader, skateboarder, softball, soccer ball, running child, etc. I ask, however, because all of these things can and do occur should we ban all of them from our city parks? Should our parks be places that we admire passively from afar, from a bench or a sidewalk? Should the actions of an irresponsible few be the determining factor for removing the opportunities of the responsible majority? Those who are not responsible will not be hindered by the law and they are all that will be left in the parks. Let us consider the statistics. In 2007 dog bite incidents in the city parks represent slightly more than 2% of dog bites in New York City. I would urge the decision makers to avail themselves of a copy of the book *Dogs Bite: But Balloons and Slippers Are More Dangerous* by Janis Bradley so that statistics can be put into perspective. For example, according to statistics gathered by Ms. Bradley a person is 5xs more likely to be killed by a bolt of lightning than by a dog. It would also be of benefit, I believe, for all involved to better understand something of dog/human behavior. *The Other End of The Leash* by Patricia McConnell is an easy read on the topic.

If the issue here is public safety perhaps we need to provide opportunities

for education on dog bite safety. It is not, unfortunately, a priority in this country. However, when there is a media report of a dog attack it is a momentary, monumental outrage but still there are very few dog safety programs in schools or communities. According to an interview with Ken Phillips, the foremost dog bite attorney, most dog bite victims are children, because, he says, there is a lack of education on dog safety by parents and schools. He also states that there are 5 factors that contribute to dog bites: 1) Training, 2) Socialization, 3) Health of the dog, 4) Behavior of victim that prompts the bite, and 5) Breed and owner behavior in relation to understanding that breed.

Owning a dog requires responsibility and part of that responsibility is to become educated about dog behavior, training and appropriate conduct in public places. Allowing a dog off leash doubles that responsibility. My experience as a dog owner, trainer and behavior consultant is that the majority of the owners and dogs enjoying off leash exercise with their dogs are responsible. Those that are not need education and accountability. By defining off leash activity within the parks an opportunity for education and accountability will grow.

There is a serious oversight with regard to public education of dog bite safety in our communities across the country. There are strong community based organizations of dog owners putting their funds and energies into saving off leash privileges, these strong, devoted, responsible organizations could be freed of their current burden and be able to use their resources to promote community based activities and educational opportunities for public safety and awareness as it relates to dogs. I see boundless educational opportunities if dog owners and the parks could work together rather than continue to walk the tenuous tightrope that has previously existed.

Dogs are here to stay. In fact the relationship between dogs and mankind has existed for more than 10,000 years. If dogs were as dangerous as opponents of the off leash hours would have us believe, that relationship would have ended a very long time ago.

Let us look at that relationship over these last 10-14000+ years. Dogs serve mankind daily. In prehistory, as hunting assistants and sanitation workers. Today they are saving lives, guiding and aiding the handicapped, are prescribed by health professionals for emotional support, work in hospitals, nursing homes and other care facilities as therapy dogs to bring joy to the people there, they help children with difficulties improve their reading skills in the R.E.A.D. programs, and have served as search and rescue workers and emotional comfort in the aftermath of disasters. Most of these dogs are people's pets who in addition to their duties provide companionship and unconditional love to their guardians. Research has shown that petting an animal can reduce blood pressure and other ills. There are of course the

health benefits of exercise as well.

These are just some of the things we ask our dogs to do for us and the community in which we live. They ask very little in return. To have their basic needs met: to be sheltered, fed, and just to be allowed to be dogs for a small part of the day. What does it mean to allow a dog to be a dog? Not much really. Allow him or her to exercise freely, smell the ground, feel the grass under foot and socialize with his or her own kind in a natural way (not tied to a person with a cord or forevermore crowded together in overcrowded fenced areas).

Even when just being dogs they benefit man. They delight onlookers as well as their owners with the free abandon of their frolicking, their presence helps keep us safe in the dark of night or early hours of the morning, they improve our health as we walk briskly or run to keep pace with them for an oh so short hour or so.

Off leash activity benefits the human as well. The owners benefit greatly from the exercise as they move their dogs through the park, walking miles more than they ever would otherwise. Look at a dog run ? the people are sitting on benches! The people benefit from the social interaction with others. Dog people talk to each other, strangers talk to people with dogs. It is a social phenomenon. People benefit from the contact with the animal. I've seen those not accompanied by dogs linger and smile as they watch dogs play and run in the early morning hours in Central Park on their way to work. Moms with strollers cheer a crying child by pointing and saying, "Look at the doggies." I see seniors and handicapped owners walking briskly rather than sitting home alone. Research shows that petting an animal reduces blood pressure, owning a dog reduces cardiovascular problems, emotional imbalance and a number of other ills. This is a health benefit. People spend money on their dogs. This is an economic benefit. A well-trained and well-exercised dog is a good neighbor. These dogs aren't nuisance barkers or destructive. These dogs aren't relinquished for behavior problems into the city's already overburdened shelter system.

In the scheme of the long dog-human relationship leashes are a relatively new invention. They are most certainly necessary and appropriate in many situations. They are, however, unnatural. A dog's natural movement is primarily sprinting and trotting, they rarely walk in a slow plodding fashion. Can a dog receive maximum exercise, reach maximum training and socialization potential on a leash alone? I believe NOT. All dogs from tiny 4lbbers to majestic 120lbbers, purebreds and mixed breeds need this opportunity. The vast majorities of people, whose dogs exercise off leash lead their dogs well, teach their dogs and socialize their dogs. These are the dogs that fill dog events and pass canine good citizen tests. These are the behaviorally healthy dogs. Exercise, training and socialization produces a

behaviorally healthy dog who lives peaceably in society. The benefits to people and dogs of recreating off leash far outweigh the detriments.

As a trainer, I encourage owners of suitable dogs to train them to a level to be able to exercise off leash. The clients who want to exercise their dogs off leash are more motivated to train their dogs. These dogs train faster, to a higher level and at a younger age than those whose owners do not strive for this goal.

Is every dog capable of recreating off leash? NO. Should that prevent those, in the majority, that are from being able to enjoy the opportunity? Should their owners, who have worked diligently to raise and train a social, well-behaved dog from meeting the needs of that dog? I think not.

There are dogs of all ages, sizes, and types that can and should be off leash and those that should not. The majority of owners knows their dogs and act accordingly. There is a minority that does not. With a defined law regarding off leash access to the parks education and enforcement for those who need it will be more readily available and there are training and behavior elements that can be defined and evaluated accordingly. E.g.

| | | | |
|-------------------------------|------------------------------------|--|--------------------------|
| Should | Should not | Reliable voice control | Unreliable voice control |
| Socialized defense or offense | aggression | Comfortable with all people and | |
| dogs | High predatory drive toward | Mannerly in interactions with both other | |
| animals | Prone to chase fast moving objects | | |

Where will the thousands of owners and dogs who use the off leash hours in the parks go? Dog runs are already over-crowded, there is not enough open space in most cities to accommodate more appropriately sized runs. Dog runs are not the best option for many dogs but because all dogs need exercise and not all dogs are appropriate for unfenced areas dog runs are a necessity and we are grateful for them. As a trainer I do recommend dogs runs for young dogs still in training. However, they are not a realistic solution for exercising all of our dogs.

In my work I do everything from train young puppies to behavioral help for last chance aggression cases. Socialization and exercise are 2 crucial factors for a behaviorally healthy dog. Many dogs with problems are under-exercised and under-socialized to people and other dogs. There are other factors involved but these are important ones.

Despite media headlines, dogs rarely bite without provocation. The majority of dogs are not looking to attack people or other dogs. Biting is a last resort even for those who are abnormally reactive. They would prefer to remove themselves than fight or bite. Circumstances often prevent this first line of action. In relation to this leashes and dog park fences prevent desired escape

behavior, leashes and fences define territory and resources, which causes defensive biting. Most dogs just want to stay safe. My experience in my business is that the majority of the dogs I see for aggression problems with people or other dogs demonstrate this aggressive behavior on leash, often in small tight spaces or in the home. Dogs generally do much better off leash, as there is room to move, undefined space results in less guarding or territorial behavior. Resources are plentiful. A major cause of dog bites is a lack of education regarding dog safety. In my daily personal and professional experience it seems that the vast majority of New Yorkers LOVE dogs and sometimes too much. They are unknowingly inappropriate in their interactions with dogs. For example, most people are not educated in the appropriate way to greet a dog and, as such, many dogs are "attacked" daily by people. They are touched without introduction, approached and reached for from behind, pursued when they demur from interaction. Strange human faces coo in their faces, total strangers pick up puppies without permission. Dog owners don't consult each other before allowing leashed dogs to greet. These are the instances when most bites are likely to occur. All of these things occur most often when the dog is leashed. It happens in the elevator, the lobby, city street, etc. Looking at the statistics and the ratio of dog bites to dog population it is remarkable the tolerance of the canine species. That's why the relationship has lasted for thousands of years. Dog owners are being put in a position of us against them while the real issue is how can we, as a community, better the experience of the parks for all involved. To incorporate off leash use makes the most sense for the safety of all. I am a dog owner and a professional making my living working with dogs all day, yet I do not want myself or my dog, my clients or their dogs threatened or injured due to irresponsibility anymore than those who would ban off leash use of the park. But a leash law will not keep us safer. Education will keep us safer.

Educated people won't get bitten Educated dogs won't bite. Educated owners of potentially dangerous dogs won't be in public with their dogs off leash.

There is irresponsible behavior on bicycles, rollerblades, scooters, behind the wheel of a car, by people who disregard the designated areas for playing sports. These people should be guided by law enforcement. The alternative would be to ban all of these activities from the parks to prevent the occasional infraction or injury a few individuals may cause. I urge those in the decision making process to consider that an unacceptable solution.

In closing, I speak also as the person of a large mixed breed dog who lived to be 18yrs old and who until her last year ran in the park everyday. She was healthy, agile and mentally alert as a result. She never hurt a person or a dog. I would like to share with those who have never experienced the joy of hiking with a companion animal that no matter what side of the bed you get up on or how bad your day after a hike in the park with a free moving dog,

experiencing nature with a creature of nature, you leave the park a healthier, kinder person. To quote a client who has a lovely, sweet, well mannered dog: "I can't imagine not being able to do this everyday."

Thank you for the opportunity to express my views and share my experiences and information about dogs and their behavior.

Virginia Hoffmann CPDT, CDBC

Correspondence ID: 1880 **Project:** 11759 **Document:** 38106
Received: Apr,06,2011 21:28:48
Correspondence Type: Web Form
Correspondence: I am a dog owner who would be affected by the proposed policy, but I object not only because it will affect me, but because it will prevent people of all ages from enjoying beaches and trails with their dogs with no sound basis for doing so. The management plan provides no support for its conclusion that exclusion of users with dogs is the best solution to occasional user conflict. Moreover, the study specifically cites concerns about habitat, particularly birds, but cites no studies to support those concerns.

Dogs get people outside walking and hiking, enhancing peoples' lives by making them healthier and happier. Why would we want to erect barriers to enjoyment of the outdoors with loved pets? I understand the need for rules that allow multiple users of different comfort levels to enjoy the outdoors together. I am open to time constraints, limits on the number of dogs that can accompany a single person, limits and fines for aggressive dog incidents, and hefty fines for those who do not clean up after their dogs. These are all solutions that seem not to have been carefully considered, even if a problem has been adequately documented.

I am confident that the ggnra can find a way to allow all users, including those with dogs, to enjoy the open space of San Francisco and Marin while also preserving the natural habitat and surroundings for future users. Please reconsider this plan.

Correspondence ID: 1881 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 01:02:25
Correspondence Type: Web Form
Correspondence: Dogs are a threat to humans. Humans should be allowed to avoid this threat. In order to accomplish this, there should not be very much off leash space in the bay area and these spaces should be fenced off. Dogs are and owner's

friend and protection. Because they are for protection, they have a tendency to bite/be threatening. Walking a dog off leash is similar to carrying a gun fully loaded. Having a dog run up to you for some feels like having a gun held to your head. There are many events involving dogs that happen in the bay area each day, most of which are never reported. I believe that the NPS is vastly underestimating the effect of dogs of people and wildlife/the beauty of our park. There is a lot of evidence supporting more regulation in the parks. (while the regulations are not quite strict enough, no off leash dogs should be in an open area. all should be fenced off) Government regulations have shown to decrease hospitalizations due to dog bites in Spain and I believe it would be similar here. Most dog bites in public places are from off leash dogs so regulations that decreased off leash dogs and decreased people's interactions with off leash dogs would also decrease hospitalizations, health care costs, days lost at work etc.

References: "Decline in hospitalisations due to dog bite injuries in Catalonia, 1997-2008. An effect of government regulation?"
<http://injuryprevention.bmj.com/content/16/6/408.short?rss=1> This article shows that increased government regulation led to less dog bite hospitalizations.

"The problem of the danger of dogs; a study of incidents with dogs in a large city" <http://www.ncbi.nlm.nih.gov/pubmed/8261904> This article shows that the vast majority of dog bites in Germany were from off leash dogs (90%).

"The ecology of dog bite injury in St. Louis, Missouri."
<http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1435667/> This article explains that often the victims are blamed for dog bites but are rarely acting in way that would provoke a dog.

For these reasons, I believe that all off leash areas should be regulated and all rules should be enforced. The preferred alternative could be changed in that the amount of off leash areas should be decreased by about half of what is proposed. Also all areas that are left for off leash use, should be fenced off.

Correspondence ID: 1882 **Project:** 11759 **Document:** 38106

Received: Apr,07,2011 09:50:25

Correspondence Type: Web Form

Correspondence: I am deeply concerned about the proposed dog management plan. As one of thousands of responsible dog owners who choose to live in the Bay Area in part for its access to open space areas for my dog and annually contribute to the national parks, I am deeply dismayed by the short-sightedness of this proposal. One need only go to Fort Funston or Chrissy Field on a weekend

day to see that the vast majority of people using this space are responsible dog owners.

It's my understanding that the National Park Services is not the Nature Conservancy protecting areas against use, but rather promoting responsible use. Reducing off-leash areas is not responsible use it's mean-spirited and short-sighted. It will reduce the amount of people enjoying the parks, reduce revenues from contributing dog-owners, cause great animosity, and may reduce the tax base of people like me who feel that the expense of living in the Bay Area is outweighed by the natural resources available to us, as those resources will be reduced drastically.

Thank you,

Nada Djordjevich

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| Correspondence ID: | 1883 | Project: 11759 | Document: 38106 |
| Received: | Apr,07,2011 09:59:49 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Please protect the snowy plover and enforce on-leash policy for dogs at Ocean Beach; voice control is not sufficient. | | |

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|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 1884 | Project: 11759 | Document: 38106 |
| Received: | Apr,07,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | The Compliance-Based Management Strategy must go. This poison pill that will allow the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions will not work. The change would be permanent. A management plan should not come with a built-in nuclear option, which is what this is. It allows a relatively few bad players to undermine and destroy a traditional recreational use of the area. No number of responsible dog owners will stop what will become the inexorable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. Tens or hundreds of thousands of hours of incident-free dog walking will not matter. There should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status can be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined ? | | |

by volunteers biased against dogs? by surveillance cameras? ? is not included in the DEIS.

The Preferred Alternative is not acceptable. It is overly restrictive, and its restrictions are not justified by the totality of available data. It is based on separation and exclusion, a management philosophy that goes against the values of the Bay Area in which it is fully immersed. It violates the mandate for the " maintenance of needed recreational open space" contained in the legislation that created the GGNRA. The DEIS is full of negative things that "might" or "could" happen if dogs are allowed off-leash at various sites. But there is very little evidence presented that these hypothetical impacts actually happen. Given the intense scrutiny of dogs by the GGNRA over the past decade and more, the fact that there is not more persuasive real data about significant impacts of off-leash dogs means that there is no real justification for the proposed restrictions contained in the Preferred Alternative. The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with dogs, and could lead to an increase in conflict as more and more people are forced into smaller and smaller areas. The impacts of people moving from the GGNRA into city parks is not adequately addressed in the DEIS. Any alternative must address these impacts on city parks and ways to mitigate them.

The GGNRA should develop a new alternative, the A+ Alternative, that will better balance the recreational needs of the Bay Area with protection of natural resources. The DEIS calls the "No Change" Alternative "A". This is the 1979 Pet Policy with some restrictions, particularly restrictions on off-leash at Ocean Beach, Fort Funston, and Crissy Field because of the snowy plover and native plant restorations. More than one-third of Bay Area residents have dogs and we now know the importance of off-leash recreation for dog's physical and mental health, as well as the importance of the significant social communities that develop where people recreate with their dogs off-leash. This large segment of Bay Area residents should not be restricted to significantly less than 1% of GGNRA land (that is how much GGNRA land is available for off-leash recreation in Alternative A) to have a satisfactory park experience, especially since there is little scientific evidence supporting restrictions on off-leash. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the Bay Area. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and

education where problems arise. Enforcement of already existing regulations should target irresponsible dog owners who create the few problems documented by the GGNRA, while allowing responsible dog owners to continue their traditional off-leash recreation without harassment.

There are not enough trails available for off-leash recreation in the Preferred Alternative. We need more. Not everyone who goes to the GGNRA plays fetch with his or her dog. Many people enjoy hiking on trails with their dogs as their companions. There are not enough trails with off-leash access in the Preferred Alternative.

There must be off-leash access in San Mateo County and on new lands as they come into the GGNRA. The Preferred Alternative has no off-leash on any GGNRA land in San Mateo County, even though much of the land allowed off-leash access before it became part of the GGNRA. Off-leash recreation is a traditional use of those lands, and it must be respected and maintained. That is in keeping with the GGNRA's mandate for the "maintenance of needed recreational open space" contained in the legislation that created the GGNRA. The refusal to consider off-leash recreation for any new land that might come into the GGNRA in the future is an additional violation of the GGNRA's recreational open space mandate. There needs to be a mechanism for additional off-leash recreational open space when new land comes into the GGNRA

Correspondence ID: 1885 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 10:47:24
Correspondence Type: Web Form
Correspondence: We are highly opposed to having any of Crissy field closed to off-leash dogs. We have a new puppy who can be quite sluggish most of the time. The only time I can look at her and think she is truly happy is at Crissy field. She acts like it's the best day of her life every time we go. My fiance and I love going there with her together. It feels like a family event and it's something that we all really enjoy doing. It's our favorite outdoor event in San Francisco. It would be tragic to have this taken away from us.

Correspondence ID: 1886 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 10:57:48
Correspondence Type: Web Form
Correspondence: To Whom it May Concern, I am a senior at SFSU studying Natural Resource Management and Conservation. One of my favorite recreational activities is hiking. As far as the GGNRA parkland is concerned, I particularly enjoy walking at Land's End, and Mori Point. Prior to studying

Natural Resource Management and Conservation I was unaware of the serious damage that off-leash dogs create in parks, but I can tell you that I NEVER liked off-leash dogs. I always had dogs as a child, and while I am not a dog lover per se, I am not opposed to dogs. I just do not enjoy strange dogs running up to me when I am trying to enjoy myself in parks. I have also worked as a day camp counselor in Tilden park and I can tell you that off-leash dogs are very scary for some children. I know that San Francisco is full of highly passionate and entitled dog owners, but I believe that while they may have a lot of power, they are NOT the majority of the population. I do not even visit Fort Funston because I am aware that it has basically become a dog park. The GGNRA is home to many sensitive, endemic species that need to be protected from off-leash dogs. I also feel that off-leash dogs present a threat to the elderly, who are in danger of being knocked down by uncontrolled dogs. I do not care if the dog owner tells me that "my dog is friendly", I still want their dog to stay out of my personal space. I am sure the same dog owners that let their dogs run up to people would be troubled if I ran up to them and stuck my nose in their crotch. Why is it okay for their dog to run up to me and invade my privacy? There is also evidence in a report by Dr. Nina Roberts to suggest that minority ethnic groups are disproportionately impacted by off-leash dogs as they are afraid of the dogs. Many people, including myself dog feces in the parks to be off-putting. I have noticed that some dog owners place their used dog-feces bags along the side of the trail. I also find it upsetting that someone's dog that might have been running through poison oak is allowed to run up to me and rub themselves on me, possibly giving me poison oak. Many studies have been done showing that off-leash dogs are not only a problem for wildlife and sensitive plants, but that there is also increased risk to the actual dogs themselves.

I strongly urge you NOT to allow off-leash dogs in the GGNRA, accept perhaps in fenced-in designated "dog park" areas. Please do not cave-in to the demands of the powerful dog-owner minority. You are mandated by Congress to prevent impairment of the Parklands. Allowing off-leash dogs will directly conflict with the non-impairment mandate.

Thank you, Ms. Cory S. Singer

Correspondence ID: 1887 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 11:00:37
Correspondence Type: Web Form
Correspondence: I strongly support clear and strict rules restricting off-leash dog usage in Golden Gate Park. Protecting fragile ecosystems and creating an environment where children and those who do not own dogs can enjoy the park should be the number one priority in this planning process.

Correspondence ID: 1888 **Project:** 11759 **Document:** 38106

Received: Apr,07,2011 12:17:50

Correspondence Type: Web Form

Correspondence: I appreciate the efforts of the GGNRA to address growing community concern about dogs in parks, and I particularly appreciate that the preferred alternatives are those which are most protective of the natural environment. I am concerned, however, about the lack of discussion of and planning for dog waste in these parks.

On-leash, ROLA or off-leash, dogs accessing these parks will leave waste behind. The sheer volume of this waste, as well as the staying power of its odor, is a real problem. While many dog-owners will pick up after their pets, many still do not. Just this week, while walking at Crissy Field, I counted ten piles of dog waste on the promenade. And even conscientious dog-owners cannot remove every crumb of waste, especially in grassy areas. A visitor to Duboce or Dolores Park on a sunny day will be hard-pressed to find a spot to put a picnic blanket that doesn't smell of dog waste. The Airfield at Crissy Field is perhaps not in that category at this point, but as a mother of young children, I am dismayed that I cannot let my children run, play tag, fly kites, etc. on the Airfield without having them wander through dog waste. The beaches at Crissy Field, too - I struggle to avoid patches of sand that are soaked with and stinking of dog urine.

The last time I was at Crissy Field, I counted five commercial dog walkers in the space of an hour, each with at least ten dogs. All of these dogs will void their digestive systems into the park. Some of it winds up in garbage cans; much of it soaks into the pathways and beaches, and smells bad. The garbage cans, too, smell terrible. It's very sad to begin a walk at the Yacht Club, breathe in the smell of sage and lavender, and then have the fresh air carry the smell of dog waste, which intensifies at every garbage can, for the remainder of the walk.

The preferred alternatives will require dogs to be on-leash in more areas, and will require dog walkers to walk fewer dogs at a time. But they do not address the volume of dog waste being delivered to these parks on a daily basis, deposited indiscriminately onto pathways, fields and beaches. Particularly in a region where it doesn't rain for months at a time, we all have to live with the sight, smell and dirt of dog waste all summer and much of the fall.

I would think that Fort Funston would provide a cautionary tale - it is one of the most beautiful and scenic spots in this area, but it simply reeks of dog urine, especially on a warm day. I would not consider bringing visitors there

- despite the gorgeous views and historical significance, it would be like bringing guests to a bus station restroom. Please do not let Crissy Field go the same way.

Could there be a dog run area by the parking lot, where dogs are expected to deposit waste, and which is regularly sluiced off? Or some other solution? I think commercial dog-walkers should pay a fee for a permit to walk dogs at parks, to offset the cost of handling dog waste. And I would also be willing to pay a fee to use the park, to help offset that cost, so that my children and I could enjoy the area without stepping in and smelling dog waste during our visit.

Correspondence ID: 1889 **Project:** 11759 **Document:** 38106

Received: Apr,07,2011 12:43:12

Correspondence Type: Web Form

Correspondence: After having lived at the top of county view road for the last three years and hiking on trails leading down to Tennessee valley nearly every day, I can say that I have never seen any enforcing agent talk to dog owners that allow their pets to run wild on leash restricted trails. At the top of county view road there is a short stretch of fire road dog walkers use regularly. Leash restrictions apply to this area but the vast majority of dog owners do no leash their pets or clean up after them. I have taken to advising them that there is a ranger giving out tickets at the trail head, and this works most of the time.

I am an avid wildlife viewer, runner, and general outdoor enthusiast. Dog owners should understand that their domesticated animals are destructive to wild areas and throw a finely balanced ecosystem out of it's natural processes. They should also recognize that although, "my dog is friendly" it does not make it ok for a muddy pet to jump up on other trail users.

The point I would like to make is that no matter what plan you come up with there needs to be a better enforcement methodology. I am all for multi use land management and do not feel over rigorous restrictions are beneficial to our society. Leash laws serve a founded scientific purpose but without any enforcement they are pointless. You have put in all the effort for this assessment and impact report, now please follow through and hold dog owners accountable to your implementations. Please consider a more systematic enforcement policy that let's pet owners who are unwilling to adhere to leash laws know that there are consequences and the laws actually hold merit.

Thank you, Ben Snead

Correspondence ID: 1890 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mr. Frank Dean, Superintendent Golden Gate National Recreation Area 201 Fort Mason San Francisco, CA 94123

Dear Superintendent Dean:

Thank you for your work in preparing the Dog Management Plan/Draft Environmental Impact Statement (DEIS) which was released in January. National Park Service staff put a considerable amount of effort into preparing a thoughtful document that explores five options, with a preferred alternative that attempts to balance protections for the park's natural resources with the public's right for exercise and recreation.

As an urban area park/recreation area, GGNRA has a unique mandate. The final plan must include options for public use, both with and without dogs, as well as safeguards for environmentally sensitive areas.

Many constituents in Marin County, however, have contacted me with concerns that the preferred alternative severely reduces the areas open to people with dogs. As you know, residents value the opportunity for exercise on the trails of Southern Marin with their canine companions. It is my understanding that several groups have put forward additional alternatives that they believe will protect the environment while allowing for greater recreational use with dogs. One proposal, for example, suggests using mostly existing fire trails near parking areas as well as a timed approach to some of the higher use areas.

I urge you to consider all these proposals as you work to finalize the Dog Management Plan. I am sure a plan can be developed that acknowledges both recreational and environmental requirements.

Sincerely, Lynn Woolsey Member of Congress

Correspondence ID: 1891 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 13:45:59
Correspondence Type: Web Form
Correspondence: There are very few off leash areas left in GGNRA and in Marin county in general as it is. Very few parks allow dogs off leash as well. In many areas, like ours in central Marin, the vast majority of residents own and need to exercise dogs. It goes without saying that people need to train their dogs to

be on good voice command and also to clean up after their pets in public lands. Please do not create even fewer legitimate venues to walk and exercises our dogs. This would be a huge mistake for our county and would make it more difficult and community oriented to utilize and visit public lands.Thank you

Correspondence ID: 1892 **Project:** 11759 **Document:** 38106

Received: Apr,07,2011 14:16:21

Correspondence Type: Web Form

Correspondence: I have been a nature lover all my life and spends a great deal of my leisure time walking with my dog all over the GGNRA. My dog is under voice control and perfectly well trained not to chase wild animals. I take pride in always picking up after her even in remote areas. I have also observed over the years that dog owners are by far the most frequent users of parks and are generally very responsible. On the other hand, I do understand the need to regulate the wilderness and irresponsible behavior that can be highly destructive. So instead of virtually locking us out of the parks and pissing off a lot of law abiding tax paying residents of the bay area, why not establish a licensing system for dog owners. It would generate money for the parks, bring work for dog trainers and more importantly place the responsibility to abide by the law on us. And any dog owner caught in destructive behavior would be at risk of paying a hefty fine and eventually losing their license! So don't push us out, just legislate! ie Dog walkers would have to be in a whole different class; they are running a business and rarely have their animals under control!

Correspondence ID: 1893 **Project:** 11759 **Document:** 38106

Received: Apr,07,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing this letter as public commentary on the GGNRA Draft Dog Management Plan Environmental Impact Statement. I am homeowner who lives near Sweeney Ridge, and I often walk my dog there. Although I am writing this letter as a concerned citizen, professionally, I am a Professor of Environmental Sciences at the University of San Francisco. Due to the nature of my work, I have had ample opportunities to review various environmental policies and believe that experience gives me some insight into the evaluating the proposed changes here. Overall, I am concerned that the policy unfairly targets dogs and does not consider the consequences of restricting dogs to limited areas.

First, the justification for dog management plan is poorly thought out because impacts on the space and staffing are the result of multiple user

groups. The background of your executive summary notes that use of the GGNRA has increased, as the population of the San Francisco Bay Area has increased. The background then goes on to cite an increase in the staff time required to manage dog-related issues and use this as justification for the dog management plan. However, the problem with this argument is that if overall usage of the area has increased, you would expect a proportional increase in management of dogs, right along with a need for increased management of everything else- from parking to lost hikers. Why then is this proposal targeted at dogs, and not, say, bicyclists, whose use has presumably also increased? Or perhaps car-owners should be targeted, as parking can destroy habitat.

While I agree that an increased usage of an area can lead to environmental degradation, there is no reason to target dog owners as the specific cause. For example, the documentation of the preferred plan for Sweeney Ridge notes that "Alternative C protects the Mission Blue butterfly habitat and large area of undisturbed contiguous habitat that is rare and contains wildlife that could be disturbed by the presence of dogs." To point out the obvious, although protecting habitat is an important goal, my dog doesn't eat butterflies. Decisions should be based on carefully collected data, not just someone's feeling that a group "could" disturb the habitat. Walking beside me on the trail, my dog does not degrade the habitat any more than any other passerby. But who might really pose a risk to a butterfly? How about small children, trying to catch them? That could be a real threat, and surely the number of small children using the GGNRA has also increased, so perhaps the proposal should target them. Although I'm being a bit facetious, my point is that the impact statement needs to take into account the contribution of all of the different resource users, not just dog owners. If the habitat is so sensitive that someone walking through it might adversely impact it, then perhaps you need to consider closing it to everyone, not just targeting one user group.

Along these lines, I would also like to address the safety concerns that the report has brought up with regard to dogs. I would like to point out that owning a dog that bites people is illegal and addressed under other laws. It is not necessary to ban dogs to achieve the goal of having an area free of malicious dogs. This again bears on the idea of unfairly targeting dogs. To take this example of creating a safe environment by banning some groups to an extreme, you could argue that banning all men from the park could create a safer environment for children using the area, because the population contains some males that are criminals and may pose a particular danger to children. Luckily, our legal system protects all of us (say by criminalizing certain behaviors rather than discriminating against an entire group). I would also like to point out that I can walk my dog legally in my own neighborhood; why would the dog be more likely to bite when walking on Sweeney Ridge? Of course, it is possible that poor management could create

such a situation, by cramming all dogs into a single, overcrowded space.

Along those lines, these proposed changes may very well end up creating some of the very problems that the dog management plan is purportedly seeking to avoid. Again and again in the environmental field, we see this same story- that when spread over a large space, an impact can have very minimal effects, but when concentrated on a single area, the effects may overwhelm the local ecosystem. There are very few open spaces where dogs are allowed along the Peninsula. Sweeney Ridge is one of them. But the preferred plan concentrates dogs to a very small area of Cattle Hill. So if all of the dogs that are currently spread out over the entire area suddenly condense into a single spot, what will those impacts be? Certainly, for people who dislike dogs, the effect could be overwhelming. For instead of passing a dog once every five to ten minutes (current estimated rate for our usual walk from Sneath Lane/NPS easement to the Portola Discovery Site), these people now passed one dog every minute? Also, it is entirely possible that there would be conflicts between the dogs themselves in this new, overcrowded environment. Finally, from a broad environmental perspective, let me point out that if I drive elsewhere (say to the East Bay which has more dog-friendly parks), I will be increasing my global carbon footprint and thus degrading the environment in other ways. Think of the big picture before moving forward.

To conclude, I strongly oppose the preferred alternative for Sweeney Ridge. Enacting this plan means that I will no longer be able to go hiking along one of my favorite trails, which is in my community and readily accessible from my home. There is a severe shortage of open-space where I can walk with my dog in San Mateo County. Loss of this the Sweeney Ridge hiking trails would only exacerbate this problem, and would degrade the quality of life in this county. Needless to say, I prefer Alternative A or Alternative E, which would provide the most access. In moving this process forward, I would urge the decision makers to take a broader approach, which considers that any group of people using open space will leave some footprint. This problem is not unique to dogs. Removing any user group (say small children, who may have a tendency to catch insects) will obviously lighten the load on the environment, but may not be a fair or balanced approach to making good community decisions.

Correspondence ID: 1894 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 16:04:37
Correspondence Type: Web Form
Correspondence: Pleas keep Fort Funston an off leash dog park. I would like to see the hang gliding area and the fields behind the hang gliding area closed to dogs but please keep the rest of the park open to off leash dogs. THEY NEED A

PLACE TO RUN FREE.

Correspondence ID: 1895 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 16:29:17
Correspondence Type: Web Form
Correspondence: It's been reported that it would cost \$800,000 to implement and enforce the recommended new policies. I'm not sure why spending nearly a million dollars to fix something that's not broken is a good use of our limited resources? Why not charge more for dog-walkers with three or more dogs and charge for non-fixed dogs and those that don't clean up after their dogs?

Correspondence ID: 1896 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 16:44:15
Correspondence Type: Web Form
Correspondence: Dogs are members of families. If my dog is not allowed I will not go there. I hike with my dog and I avoid national parks because national parks are not pet friendly. LEASHED DOGS SHOULD BE ALLOWED ON TRAILS!

Correspondence ID: 1897 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 17:23:13
Correspondence Type: Web Form
Correspondence: Dear Park Service,

As an owner of a certified Service Dog, I am particularly upset at the prospect of having her off-leash running activity curtailed or eliminated. For her to run unbridled is her only opportunity to be "off work," and is essential for her well-being. Obviously, this leads to my own well-being, as she takes care of me all day, every day. I must suggest you take into consideration the impact this management plan will have on the many of us who rely on the assistance of their service animals.

Thank you for your time.

Respectfully, Todd Ahlberg

Correspondence ID: 1898 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 18:33:13
Correspondence Type: Web Form

Correspondence: This proposal will end virtually all off-leash dog recreation in San Francisco, meaning that no dogs will be able to go and run around on the beach.

Every day, hundreds if not thousands of San Francisco and Bay Area dog owners make use of the beaches and parks in this region to allow their dogs to exercise. Each and every one of us pay taxes and contribute to our national (public) parklands. Yet a large portion of us will be disenfranchised by this proposal. In addition, this will greatly decrease use of these parklands, which would affect future funding.

This proposal is extreme and it also purports to solve problems that do not exist. There is not a large issue with dog droppings. There are predators other than dogs that chase birds and dogs rarely catch birds. Nesting areas are no more threatened by dogs than they are by people.

Finally, it is cruel to the dogs. Dogs need space to run around and get exercise while off-leash. This proposal would relegate all dogs in the region to on-leash exercise only, which is simply not adequate. Tiny dog runs are not a valid alternative.

The parks belong to all of us, and the idea that some small minority of people want to ban an important source of recreation for the rest of us is offensive, draconian, and unnecessary. As a taxpayer and a San Francisco I object to this proposal in the strongest terms.

Correspondence ID: 1899 **Project:** 11759 **Document:** 38106

Received: Apr,07,2011 19:48:31

Correspondence Type: Web Form

Correspondence: Dear Sir or Ms, Thank you for the opportunity to comment on this policy and, in addition, thanks for the many hours of work that have gone in to developing it. My comments are going to be general in nature, as I do not have in-depth knowledge of each area and of the potential impacts of off-leash dog activity in those areas.

I will start by saying that I have fond memories from the 1970s of bringing my roommates' lab-setter out to Ocean Beach and letting her run free, jump for frisbees, run in the waves, chase gulls, etc. But that was long before I became conscious of the fragility of natural resources in the area and of the need to protect them.

In more recent years, I have indeed witnessed off-leash dogs chasing after birds -- including snowy plovers on one occasion -- at Ocean Beach and Crissy Field. In those cases, the owners were either blissfully unaware or

negligently uncaring about the impact their dogs were having. Or occasionally, the dogs did not initially respond to voice commands to return.

I understand, therefore, the almost-inevitable conflict between dog owners wanting to have their canine companions share their outdoor recreation and the responsibility of the Park Service to be a good steward of the threatened natural resources under its purview. There's no "evil" side here; it is a matter of priorities and which value(s) should take priority in which places.

And, of course, this is an especially delicate and difficult issue in a heavily urbanized metropolitan area such as the Bay Area. We are fortunate to have a national park in our back yard, but it brings with it these very real conflicts between users and mandates. Over the years, however, I have come to see and understand the importance and privilege of having healthy habitat where wildlife can survive and thrive in proximity to such a large human population. This "coexistence" brings numerous mutual benefits, not the least of which is simply the survival of species that inhabited this region and depended on the habitat here long before humans and their dogs arrived in large numbers. We have taken over much of their home territory and we have some moral responsibility to respect their rights to what little of it remains unoccupied by our human structures. The other benefits include opportunities for passive recreation (such as birdwatching and nature photography) and environmental educational opportunities (both for adults and for urban youth).

So it does disturb me that many dog owners (or maybe just those with the loudest voices) seem to view off-leash dog access on national park land -- and beaches in particular -- as a right and not a privilege. And given the difficulty of educating and training all dog owners to keep their dogs under voice command and to recognize rare and endangered wildlife, it seems to me that there is a reasonable basis for banning off-leash access in areas that are determined -- by scientific study -- to serve as habitat for wildlife that would be adversely affected by the presence of such domesticated predators... i.e. off-leash dogs. In other areas, where human presence has so degraded habitat that coexistence with sensitive wildlife species is no longer likely or possible, then it seems to me that off-leash dog recreation should be considered, as long as it does not conflict with more passive recreation by other humans.

Thanks again for the opportunity to comment on this sensitive issue.

Correspondence ID: 1900 **Project:** 11759 **Document:** 38106
Received: Apr,08,2011 10:48:28
Correspondence Type: Web Form

Correspondence: The Plan needs to be as restrictive with regard to dogs as possible in non-urban areas such as the Marin Headlands. I hike there often and see people with dogs either disregarding or not taking the trouble to find out about leash and trail restrictions. I have never in the past 10 years seen any enforcement of the leash and trail restriction rules. Dogs are wonderful animals and companions, but they do not belong in wildlife habitat areas.

Correspondence ID: 1901 **Project:** 11759 **Document:** 38106

Received: Apr,08,2011 11:35:33

Correspondence Type: Web Form

Correspondence: This report is another example of the national park service having an agenda and then developing a means to further it. The park service has lost the trust of The People in recent years because of their arrogant and bullying manner. The parks are for the People to use and enjoy and not the park service to police and control. There are too many rules and regulations already that inhibit the enjoyment and use of the parks. Please don't enact any more ways to stop People from the JOY of their rightful lands. We don't need any more cops in the parks creating revenue for the government. Is it no wonder that the park service is having trouble being funded by congress. When I was a kid, a ranger was a helpful person with useful information and advice to hand out , not one that hands out tickets. Walking a dog is a joyful experience. The park service personnel should try it sometime. The minimal impact that some dogs cause is no reason to ban all dogs and People from enjoying their parks.

Please don't enact any more rules that may ban dogs and People from enjoying the parks.

Correspondence ID: 1902 **Project:** 11759 **Document:** 38106

Received: Apr,08,2011 13:35:12

Correspondence Type: Web Form

Correspondence: I'm most concerned about Ocean Beach, Chrissy Field, and Fort Funston and the impact of dogs, both leashed and unleashed, on threatened Snowy Plovers and Bank Swallows.

I would like to see the requirement that dogs must be on leash all 12 months of the year in the Snowy Plover Protection Areas. This will avoid the current confusion. I have talked to many people who were confused as to what time of year there was a leash requirement on Ocean Beach and who did not leash their dogs because of the confusion. The leash requirements must also be enforced, as they are not currently enforced in any adequate manner.

Also, on Rodeo Beach, I have on several occasions watched unleashed dogs chasing nesting and resting waterfowl and charge up and down through the incredibly sensitive lagoon edge and wetland plants. This should not be allowed. Dogs should be required to be on leash at all times in this sensitive area. Also, patrols and enforcement should regularly check on the disturbance created here by unleashed dogs. Also, on Rodeo Beach last year, a very scary, unleashed pit bull came running full speed and straight at me scaring the beejeezuss out of me. This was an incredibly disturbing event at a place the National Park Service should make accessible and safe to me.

I also feel that National Park lands are a place for people and wildlife, and dogs should not be allowed as they greatly disturb wildlife and, at times, frighten people. There are other, more appropriate places for dogs to be than in the Golden Gate National Recreation Area.

Correspondence ID: 1903 **Project:** 11759 **Document:** 38106
Received: Apr,08,2011 21:19:54
Correspondence Type: Web Form
Correspondence: Dear commissioners,

Please keep all areas of the GGNRA accessible for dogs. As a third generation Californian, I grew up with our family taking dogs to the beach, be it city beaches like Baker and Ocean beaches, Fort Funston, and Muir Beach. I currently enjoy walking my chocolate lab Nessie at Crissy Field in San Francisco daily. Almost all the dog owners and dog walkers there are sensible to other recreational users during the peak hot days. Walkers and dog owners use the beach there rain or shine. The current plans for limited off-leash access at Fort Funston would cause even more crowding at the western beach, which can be quite narrow at high tide. The money used for all these hearings and reports would have been much better spent to repair the broken fences along the protected dune areas and educate dog owners and walkers about how best to share this wonderful resource.

A large dog like mine cannot get enough exercise by leash walking. She needs to run, chase other dogs, and swim. And she needs to do this every day. It would be shameful if the Park Service tried to impose a cookie-cutter approach to these unique urban parks, that always allowed dogs, on and off leash, when they were city and county property.

Sincerely,

Pia Hinckle San Francisco, CA

Correspondence 1904 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,09,2011 15:48:52

Correspondence Type: Web Form

Type:

Correspondence: I found no data in the EIS report by a Park Ranger that specifically describes the nature of a "pet" related disturbance to wildlife. What does this mean- a barking dog? Killing? What plants were impacted? How were they impacted? Did they survive? The GGNRA proposal to change the rules related to where pets can be off leash/walked is faulty. It lacks specific data that would show the harm, if any, caused by pets and their owners. Park Rangers are not animal control officers. They should be on patrol to stop speeders, thieves, and drunken visitors who have the greatest potential to harm the GGNRA and its visitors. I support law enforcement when its applied appropriately, and where its needed the most. Do the proper research and you will see that pets are not a threat compared to people who speed, steal, fight, and become a nuisance to others in the Park. I do not support the EIS statement and its faulty conclusions to include missing data.

Correspondence ID: 1905 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,09,2011 20:34:24

Correspondence Type: Web Form

Type:

Correspondence: I am a San Francisco resident who enjoys walking and playing with my dog in various areas of the GGNRA. I have met many friends this way and I fell in love with the Bay Area largely based on the dog friendly character. This is a huge piece of the open, accepting, welcoming, liberal, diverse, and friendly character that San Francisco is so well known for. This area allows for coexistence of so many things - species, personalities, income brackets, politics, ethnicities, sports teams, colleges, music genres - all of which have found a way to live together and some would say makes this area better for it. This is a rare area accepting of anyone who accepts in return. San Francisco is famous for this reason.

So it seems that this plan, and particularly the overly restrictive preferred alternative is completely unacceptable. The issues are spawned by a need to protect the natural resources of the GGNRA, resources that 'could be' unavailable to future generations. I understand that and am in full agreement that these areas should be protected. That said, the analysis is not complete in determining that dogs are the sole culprit. There are less than conscientious dog owners. There are also less than conscientious people in general, who are not considered in this plan. The complete restriction of off leash dog parks and open areas does not stop less considerate people from disrespecting the environment. The difference is that the natural, wonderful, organic character of happy people and their dogs will not be part of these areas. In fact, there will be a void of opportunities in the Bay Area. This is

not a Yosemite, but rather a city full of people with their dogs who enjoy being active, being outside, and enjoying our beautiful environment.

With regard to the EIS itself, the P&N, or specifically the Need Statement, is incomplete and does not include the detail and clarity that NEPA requires. Stating that there "could be" a problem and then describing an element of what may be the problem is all too theoretical. Other than a conceptually 'good idea', as defined by a likely non-dog owner at some point in time, there is no real Need that is clearly defined. The Purpose however states that a clear, enforceable policy is needed. Well that makes sense. I don't disagree that in fact there 'could be' a problem in the future and we should, as with many issues related to the environment, do everything we can to be good stewards. But it is just lazy to state that the appropriate 'clear, enforceable policy' is just to overly restrict use of these parks. The fact is that the EIS did not look at a reasonable range of alternatives. There is not enough consideration of limited restrictions or, perhaps better, new opportunities, trails, resources for the dogs and owners. There is not consideration of maintaining the GGNRA as they are today, perhaps some minor fixes on specific parks based on local problems, BUT with better enforcement of current laws. Enforcement is largely limited (and would be still if any of the action alternatives were chosen) because there are very limited Park rangers and enforcement officers. This is a problem, I agree. The cost of this EIS could have been better put to the hiring or better pay for Park rangers. Ultimately, if enforcement officers are included in the plan, add those to a new alternative looking at fewer restrictions allowing dog owners to use these resources in a positive way.

In summary, the main problems to the EIS are incomplete and inadequate Need statement and Range of Alternatives. One of the many problems with the overall project is that it completely negates the character of the Bay Area based on a very limited consideration of the problem of resource protection. Many dog owners, including myself, are very interested in resource protection, saving our Bay, and community development. Those of us who are in this group, I would guess, spend more time than most outside in these environments and are devoted to finding a good solution to the issue of preserving our environment for the future. This just isn't it and it misses the target.

Correspondence ID: 1906 **Project:** 11759 **Document:** 38106
Received: Apr,10,2011 00:38:33
Correspondence Type: Web Form
Correspondence: There are so few places left in the Bay Area that I can meet with other dog owners to take our dogs on off-leash walks. We pay taxes too, and I think many dog owners would agree that taking away off-leash sites would be a

real shame. I know my dog looks forward to her Sunday walks at Fort Funstun, and I'm able to get out and get some exercise as well. We live in an apartment and take our dog to the dog park daily- but it's small and basically a dirt field (mountain view shoreline park). Dogs need to be in an open, natural, off-leash environment. I find restricting owners and dog's access to these areas to be cruel, and since many people treat their dogs like members of the family- inhumane as well.

Correspondence ID: 1907 **Project:** 11759 **Document:** 38106

Received: Apr,10,2011 16:43:51

Correspondence Type: Web Form

Correspondence: The 60 miles of coastal land under the stewardship of the Golden Gate National Recreational Area (GGNRA) offer the SF Bay community thousands of acres for hiking, beaching, climbing, and exploring. However, those whose chosen form of recreation is dog walking have been banned from all but tiny, far-flung patches of GGNRA land. Now the agency proposes to reduce this pitiful amount by 90%. With no viable explanation for its necessity, this exclusionist measure smacks of baseless bigotry and blatantly violates GGNRA mandate to serve the needs of ALL members of the community, including the thousands of responsible citizens and dog lovers of the Bay Area

Correspondence ID: 1908 **Project:** 11759 **Document:** 38106

Received: Apr,10,2011 17:29:00

Correspondence Type: Web Form

Correspondence: I can only ask, "when did dogs get a bad rap?" In this world of economic depression, natural and manmade disasters, pathology of all kinds including rampant mental illness, when did dogs become the enemy? We need them so much. Why are they not nature? I don't understand the whys although I've been following this snowy plover argument for almost 20 years now. I have to believe it's about money and tourism, not snowy plovers. I have never seen a dog chase a snowy plover and I have gone daily to Crissy Field for almost 20 years. I could write about the overly restrictive proposed policies but I'd rather focus on what you are taking away from humanity. We need dogs to keep us healthy and sane. ON leash dogs are more aggressive because they are less socialized and certainly less fun. More aggressive dogs mean more murders of dogs, more gassing. I have asked this question over and over but, "do any of you human beings behind these proposals actually have dogs?" I cannot believe that you do. A Samoyed dog like mine, for example, cannot be constrained to a dog park or small area. They are designed by nature to pull sleds over vast terrain. They need broad access to many miles to be fulfilled as a living being and work to their potential.

Potential. That's what we all should be striving toward. NOT just dog lovers and animal lovers but you, too, policymakers who draft these proposals. The snowy plovers are beautiful and they're doing just fine. The inns being built in the Precidio for tourists who will soon be coming in droves...well, we don't want off leash dogs discouraging the tourists, do we?

Correspondence ID: 1909 **Project:** 11759 **Document:** 38106

Received: Apr,10,2011 18:56:47

Correspondence Type: Web Form

Correspondence: Below is the email I sent to all of San Francisco Supervisors concerning their hearing on "Off Leash Dogs in Federal Parks"

Dear Supervisors - I would like to comment on the scheduled upcoming hearing on "Off Leash Dogs in Federal Parks". I have been involved in this issue for many years now and have testified in front of other Supervisor hearings as they entertained the idea of reclaiming parts of the GGNRA so dog owners would be able to let their pets run free. I thought such efforts to degrade the GGNRA were misguided then as well as now. Supervisor Scott Wiener's expressed concerns that the GGNRA's proposed dog restrictions will lead to an increase in off-leash dogs in City-owned parks seems to recognize that San Francisco has an off-leash dog problem in dire need of correction. By any common measure, all parks in San Francisco are de facto off-leash parks, and the only people that don't think this is true are the dedicated off-leash activists in our city. Right now there are no parks in this city that a person can reasonably expect to be free from confrontations by off-leash dogs. Personally, I have had to deal with unpleasant off-leash dogs as I stood on a sidewalk stenciled signs imploring people to leash their dog. The fact that past San Francisco administrations have abdicated their responsibility to furnish all citizens with safe, clean parks free of unwanted assault by off-leash dogs is not a problem that should now be transferred to GGNRA management.

The task before the San Francisco Board of Supervisors is to take control of our city parks and address the rights of all of its citizens, not just the very vocal off-leash dog community. The second thing you can do is to allow GGNRA management to follow their mandate to "preserve and protect" park resources without encountering your interference.

Sincerely,

M. Bruce Grosjean San Francisco

Correspondence ID: 1910 **Project:** 11759 **Document:** 38106

Received: Apr,10,2011 22:43:29

Correspondence Web Form

Type:

Correspondence: Hello NPS I am writing to support the plan to protect wildlife by limiting dog access to parts of the parks. I am a dog owner and I think dogs and people have many places to visit but wildlife do not have many places to live, nest and thrive. I think the proposed plan is sound. Please protect wildlife habitat. Please continue to plan to keep some areas off limits to dogs. I have witnessed dog owner who do not control their dogs, and even if they are controlled, the presence of the dogs inhibits and hurts wildlife. Please protect our natural resources and wildlife. They are dwindling and precious. Thank you. Sue Ferrera

Correspondence ID: 1911 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Other

Type:

Correspondence: With all the access the Park Service has to information on the Park land they are getting they should develop +set aside time to come up with alternatives Portal prior to taking Possession: Don't make your problems ours (the neighboring residences)!

Alt. Portal suggestion: Dennison Creek crossing at Hwy 1 establish small parking area at Hwy. 1. Create entry trail along w side of creek North up to hiking trails.

This whole problem can be condensed to one point: too much "burocracy" + too much "management". As a 30 year resident, dog owners have managed ourselves quite well + I would like my "backyard" to remain open for free use. Owner accountability is the thing that will keep these areas un-managed by gov't.

Who will be responsible for continuing insect abatement in wetland areas adjacent to Clipper ridge.

New park pet policy should be on-leash unless SCIENCE says there needs to be a restriction.

Correspondence ID: 1912 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Other

Type:

Correspondence: New lands (pg 6) 3/9/11

Alternative A leave Mori Point Alone!

Establish buffer areas between park area + homes.

Portals should not be in housing + school areas.

Establish dog walking areas before establishing ownership.

Ban fire arms!! from Parklands next to housing. I generally oppose removing privileges. Therefore I support Alt. A in Mori Point, Milagra Ridge + Sweeney Ridge (these are dog-walking areas! In these economic times, when we are all being asked to "cut back", please allow us to continue the dog walking trails we currently enjoy. This is important for our physical + emotional well being. For the record, I can support "on-leash only" on GGNRA.

Correspondence ID: 1913 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

FoFu- Preferred alternative needs more ROLA area and clear division between ROLA and leashed or no dogs to provide more equitable division.

FoFu- Have hang-glider area be in the no dog zone for safety of dogs & people.

Educate stable owners of risk when it comes to riders in the areas where people walk their dogs @ ff - the less conflict between hang gliders, horseback riders, and dog walkers the better - more monitoring by park rangers.

Correspondence ID: 1914 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments??

There is no place for handicap people to take their dog at Ft. Fun in preferred alt.

Already fenced off most sensitive habitat at Ft Fun.

The GGNRA plan will completely destroy the dog walkers livelihood. This is how we all pay our bills! The limitations imposed will make our jobs impossible, and forcing us to keep all dogs on leash going down that steep hill is completely unsafe and impractical. Please don't do this to us!! Please dont do this to the dogs either. They need a place to play and learn how to be sociable by interacting with other dogs. Impossible on leash!!

Correspondence ID: 1915 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: The trickle down effect of the GGRNAs plan would result in more dogs being dropped off at shelters, as dogs desperately need to learn social skills from each other and they need an outlet for their energy. Dogs stuck at home all day are often destructive or bark excessively, creating PROBLEMS for their owners that wouldn't happen if they are allowed to get out and learn to be real dogs!

Parks should be for walking our dogs in, not for doing nothing in.

Dog walking should be on leash on public sidewalks, not in National Parks, unless a specific trail is rated for on leash dogs. Every town should have a few dog parks, where dogs may run free- but not in the national parks.

Correspondence ID: 1916 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

FoFu- Please include a ROLA path to the beach in the preferred alternative.

FoFu - Extend the Alt. E ROLA to the north, and include it in the Preferred Alternative. There is no reason why you can't just fence off an area for the snowy plovers while they are laying.

Correspondence ID: 1917 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

I should not be a criminal & subject to a fine just because my dog is off leash. Especially during the week in less frequented open space areas.

Fort Funston is not well maintained. Disabled persons cannot use the paths due to sand not being removed -- the dogs are the least harmful to the environment there.

Crissy Field - The beach ROLA in the Preferred alternative is the safest place for dogs to swim (compared to the beaches on the ocean).

Correspondence ID: 1918 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Sweeney Ridge + Pedro Point Headlands and Fort Funston are ideal for on leash + off leash dogs. Don't change the current land use plan.

Correspondence ID: 1919 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Please allow dogs on the Rancho lands. It's a very large area, enjoyed by people with and without dogs historically. Please find a balance between on-leash, no dog areas, and off-leash areas.

Off leash dog hiking is a long standing tradition in our community. I hope we will not be denied this form of recreation.

Historic use of newly acquired lands must be taken into consideration, including dog access.

Correspondence ID: 1920 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments new lands:

You shouldn't make it harder for us to exercise our dogs, you should make it harder for us to tie them up and never exercise them!

I recommend that new lands alternative "E" be used for Rancho Corral de Tierra. Off leash dog use has been the primary use of the land prior to

acquisition and the land is lightly used. Please don't fix what isn't broken.

Correspondence ID: 1921 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: San Mateo Comments SM 3/9

The land is for the people that use it. Park employees should not have the attitude that it is their park & they are protecting it for future generation. I need a few miles of trails for me & my dog to walk safely off-leash.

There is very little evidence that dogs actually disturb the wildlife. They don't. I am ten years old and think that is completely unfair that you think dogs are dangerous and you try to ban dogs from basically everywhere when cars are dangerous, and you can barely ban them from anywhere.

Correspondence ID: 1922 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: San Mateo

County Park=San Pedro Valley park missing from map (San Mateo)

Maybe time of day & what day of the week should be considered. Week-ends or heavy use days - more restrictions. I should not be fined if my dog is not creating any problems.

I can walk my dog on just about any sidewalk on-leash. I need places that the dog can be off leash & safe (cars).

Type of dog should be considered before saying all dogs.

GGNRA- The largest landowner in Pacifica, can't designate 1 acre for off-leash dogs?!

The science in the plan is based on shore bird data; GGNRA land in Pacifica does not have shore birds. There is no data for butterflies, snakes, & frogs that says on-leash dogs are an issue so why would we close these parks to dogs based on an opinion???

Correspondence ID: 1923 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: We lose open pet space, we lose pensions/more property taxes asked of us. This is one of the benefits. Don't take away more off leash area.

Pacifigans will do what they want to do. This will effect our property values, leave Mori Point alone Alt. A!

If you restrict us in Mori Point we will PROTEST!!

Let dogs have their exercise off leash. Stop giving dogs a bad Rep.

Correspondence ID: 1924 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: San Mateo pg. 1 3/9/11

Comments

Please leave Mori Point as it is (Alt. "A"). Many of the M.P. trails have already been closed, to protect wildlife. To restrict dogs on "Polliwog Path" in particular would negatively impact the property values of Fairway Park homeowners. The availability of GGNRA property with access AS IT IS NOW has long been a selling point of our community.

Handicap issues - not addressed!

No off-leash reasonable walking in San Mateo Count!

We are older people with dogs - we vote/pay taxes. Dog recreation important to Pacifica economy.

This whole study is a waste of tax payers \$. Put the same energy into doing more to fund schools!

Montara resdient who lives at edge of GGNRA space: I maintain a trail onto open space + built a bridge at my own expense to benefit community - 90% of users are dog owners not hikers, who typically park on Route 1. We dog owners are self-regulating and maintain clean up but only the few horse people have had representation. I will remove the bridge if the leash only rule is made.

Correspondence ID: 1925 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,11,2011 00:00:00

Correspondence Other

Type:

Correspondence: Comments!

As a professional dog walker...Avoidance is key for safety of the dogs and people - The more room a dog park has the less problems with other dog packs + owners.

Correspondence 1926 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,11,2011 00:00:00

Correspondence Other

Type:

Correspondence: When was the last time ice plant made you happy? When you watched your dog roll on it!

FoFu- As a senior with a young dog, having ROLA beach access is a safety issue. Make both beach access trails open to off-leash. STUDIES SHOW that the less exercise a dog gets, the fiercer he or she becomes. So let us exercise our dogs properly!

Correspondence 1927 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,11,2011 00:00:00

Correspondence Other

Type:

Correspondence: Comments

Dogs need areas to run and socialize. They don't have that many areas to do this. Keep GGNRA areas that are open to dogs off leash keep it the way it is.

A non-dog owner cannot imagine the joy of walking a dog off-leash. The dog's strut, gait, wiggle & sense of curiosity along a 40 minute walk makes the walk worthwhile.

If I had to stope everytime my dog wanted to sniff something stops my momentum & diminishes the value of walk. Walking the dog is not all about the dog. He/She's a companion.

PEOPLE need these spaces to walk w/their dogs. To create health in themselves + the community fostered in the care of dogs. Alt A - No Action is the way to go.

Correspondence ID: 1928 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

Dogs are only as good as the people who train them, well trained dog is a good dog. This is a people problem not a dog problem!

Do not diminish the joy we all enjoy watching dogs off leash & people running free in our recreation areas! All areas of park.

East beach -Crissy Field

East Beach @ Crissy Field is also much better for the mobility impaired (handicapped) people that want to use the beach, see dogs running.

Off leash needs to be more in the mix - not whittled down to nothing in the areas of Fort Funston & Crissy Field! Compromise means to allow the elderly ROLA access too!

Correspondence ID: 1929 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: OB/CF: Why wasn't the Warren study (2007) on WSP included in DEIS analysis?

Funston: Bank swallows burrows/nest cannot be accessed by dogs. They are in the cliff face behind the faux emergency closure.

Smaller access areas will exacerbate issues not alleviate.

On leash - off leash - on leash - off leash through the park is confusing and untenable.

Correspondence ID: 1929 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
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Smaller access areas will exacerbate issues not alleviate.

On leash - off leash - on leash - off leash through the park is confusing and untenable.

Correspondence ID: 1930 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Suggest re-evaluation of all proposed dog areas to have a loop trail. For instance, Pedro Point Headlands has one small strip near the highway - all Pedro Pt. residents (or most) would need to drive to walk their dogs on the legal area? Not good for the earth! Please expand on-leash trails in Pedro Point & elsewhere. Thx.

Expand dog walking areas on San Mateo County lands. There is not enough areas available.

Restrict dog walking in and around wildlife habitats. For San Mateo County, and cities - add dog parks that are owned and managed by municipalities where they are located.

Correspondence ID: 1931 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Ft Funston is one of the cleanest parks in SF because of the dog walkers. Also it is one of the only park in SF I feel safe in. The dog walker have a nice community out there.

If people are allowed to walk at Fort Funston, then why aren't their dogs? After all, humans cause more damage to the wildlife than our K-9 friends!

-I am unclear as to where stakeholders' input was included in the ROLA designation. -I would request an impact assessment beyond park boundaries, of implementation of these ROLA. -Society is also an evolving stakeholder in land use decisions. Urban areas have higher concentrations of park guardians & dog recreation is a significant part of the guardians socialization. For elders & the handicapped, such socialization lowers depression. Many working in therapy dogs use off leash recreation, as well.

These dogs are also stakeholders!

Correspondence ID: 1932 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 10:12:33

Correspondence Type: Web Form

Correspondence: I have a concern about enforcement of the proposed leash laws for areas of the GGNRA, based on my experience of a similar situation in local parks. Especially with respect to the possibility of increased restrictions if we don't have 75% compliance in the first year. With the current budget crisis, will there be enough money for rangers to be out doing outreach and education while enforcing the policy. General canvassing of people at Fort Funston, where I take my dogs, reveals that most people are either unaware of the draft EIS, or are poorly informed about its goals. If there are not ample signs and rangers out there to inform people about any new restrictions, we have no hope of getting the compliance numbers the GGNRA is asking for. Plus there is no incentive if we do better in compliance.

In Dolores Park, where I also take my dogs, there was a decision some years ago to restrict off leash activity to two areas of the park. But there has been no signage and the Park and Rec people who work there are very unclear about where those areas are supposed to be. I have even been told, by a Park and Rec ranger to take my dogs into an area that I know is NOT a sanctioned off leash area.

How can you expect 75% compliance when no one is aware there are rules or what they are?

That being said, I am opposed overall to the more restrictive off-leash policy being recommended.

thank you Judith

Correspondence ID: 1933 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 12:00:09

Correspondence Type: Web Form

Correspondence: Leashes should be required for all dogs in all areas of our National Park at all times.

To say that dogs should be under "voice command" is way too hazy, and it is my experience that dog owners have no idea what this means. Both myself and my young son have been jumped up on by dogs that were supposedly under voice command. I often hear: "Don't worry! He's

friendly!" but that's no consolation to someone like me, who is allergic to fur, or to my son, who is simply afraid of dogs.

One time while we were hiking with some other children on the trails in the Presidio, an off-leash dog froze and growled at us menacingly, essentially pinning us to the trail's fence. I politely asked the dog's owner to leash his dog, and he refused! He told us that we should move along! If we want to look at plants or bird watch, we shouldn't be at the mercy of a stranger's angry dog. The dog situation is so bad at Mountain Lake that, as a family, we don't even go there anymore. It's a dog free-for-all, ruining an otherwise beautiful spot.

Professional dog walkers are making money consuming National Park resources, and in my opinion should not be allowed to ply their trade in our park at all, any more than a logger should be allowed to cut down our trees. If a compromise must be reached with professional dog walkers, then the number of dogs per person should be capped at three. The average non-professional dog walker does not exceed this number.

Above all else, these conversations should revolve around preserving our National Park's very unique and precious natural resources. San Francisco Recreation and Parks manages 220 parks amounting to over 4,100 acres of recreational and open space. Let these spaces cater to the domestic pet crowd. Our National Park should be geared toward the protection of wild life, and the National Park Service is uniquely poised to protect and preserve our unique local fauna and flora. Fido and Lassie have a number of other places in San Francisco to run around, but the same is not true for the dozens of rare and endangered plants, bees, birds, butterflies and other wild life in this bio-region.

Please do not be afraid to acknowledge and limit the impact of dogs in our National Park. Dog interest groups may be vocal now, but there are many, many more of us in San Francisco that do not own dogs and will be negatively effected if dogs are not closely managed in our National Park.

Correspondence ID: 1934 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Park Form
Correspondence: If you ban dogs - how many people will you hire to patrol + clean. Because dog walkers provide security + clean up -- No one else does.

Fort Funston: - # of dogs - should be flexible - left up to dog walker to be in control. - Keep habitat areas (no dog) north of north beach access + corridor between horse trail + skyline - Sand ladder trail - on leash requirement is

safety issue for dog walkers - would be pulled off their feet. Also more dangerous for dogs. -Create a new trail starting behind ranger station to beach to avoid congestion on existing trail and hang gliding area & flight pattern. -Charge a nominal fee for parking + fund clean-up/maintenance costs - If dog walkers went away - it would be a ghost beach + transients would move-in

Correspondence ID: 1935 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: -New land acquisition should include historic recreational usage, biking, horseback riding, + dog walking.

-Milagra Ridge: Trails/pavement are wide enough to accommodate on-leash walking without trampling habitat. Why close road to top? There is sufficient passage area to avoid conflict.

- Consider electronic leash for on-leash areas.

-The same number of dogs in less space is a public danger. Shame on you.

Correspondence ID: 1936 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Fort Funston- dogs and humans should have access to all areas. Why do dogs always get treated as the enemy. Dogs need to exercise and socialize. GGNRA - should keep things the way they are.

None of the alternatives are acceptable. As a package, the impact on dog ownership will be high. Fort Funston on-leash areas will force dog fights due to leash management issues.

Correspondence ID: 1937 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Ocean Beach - I'd like to see more ROLA area. Maybe at the south end. Concerned about the effect on other areas in the city (ex: Stern Grove & Golden Gate Park) when dog owners take their dogs elsewhere.

I like the proposed limits on number of dogs per person & the permit

requirements.

In open space areas, what are the percentages of people using the land. Dog walkers in my areas are the main users by over 4 to 1. 100% All 80% Dogs 10% Bikes 10-5% Walkers

Correspondence ID: 1938 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Fort Funston: Please make a trail near the Olypica Club for us to go to the Beach. Off leash we cannot walk our dogs on leash to the beach. It is too exciting voice control is the way to go!

Correspondence ID: 1939 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: The nature of a dog's need to run in free space has not been addressed. This constricting of areas amounts to cruelty to animals.

John Muir favorite companion in the Sierras was his ___?___

Correspondence ID: 1940 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

Please don't diminish "the joy" we all share watching the interaction of dogs & people off leash playing in the recreation areas!

Make it the law that every dog walker has with them bags to pick up after their dog. Anyone caught not abiding by this law should be fined.

-Set aside a secure (fenced) area so that snakes/frogs are protected.

-When migratory birds are not present during migration allow off leash.

-Have time of day/day of week options that can be adjusted.

Correspondence ID: 1941 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

-Anywhere on GGNRA property, dogs on leash should be allowed on all trails. "Dog parks" should be responsibility of local agencies. These should be a "3 strikes" requirement for those that don't comply.

Correspondence ID: 1942 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 12:45:09
Correspondence Type: Web Form

Correspondence: Please keep San Francisco dog friendly - we moved here mainly b/c there is so many off leash areas - we came from Long Island City NY which is extremely not dog friendly - we were not able to enjoy much of the outdoor space there.....dogs make a much smaller impact on areas than humans - I have noticed much more human trash than dog poop - instead of punishing responsible dog owners please focus your efforts on policing irresponsible dog owners.

Thanks!!

Correspondence ID: 1943 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00
Correspondence Type: Other

Correspondence: Comments Background 3/9

I need 12 to 15 areas from HMB, up coast to GG Bridge & around to San Mateo Hotel Row to walk my dog off leash & not be a criminal. Trails should have a usage ratio i.e. 1 dog/ 1/4 mile, no restrictions. Also weekends should be shared - odd days from off-leash dogs, even all on leash.

Correspondence ID: 1944 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00
Correspondence Type: Other

Correspondence: There needs to be more of a mixed use approach to the NPS lands in Pacifica in consideration of the parks that already exist here; there is already a park where no dogs are allowed. We need ROLA areas.

The compliance mgt. is not a fair regulation; the fallback measure should be more education versus punishment.

The science NPS is using is flawed; Snowy plover science in Pacifica is not relevant.

Correspondence ID: 1945 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Can I buy or obtain a permit to walk my dog off leash. There should be an option for off-leash dog walkers.

Mori Point was purchased by Pacifica Land Trust by Pacifica residents wanting preserve open use. Now the Park Service is imposing restrictions to force most of us out of the trails we thought we were preserving.

I am ten years old and my mom told me that the guy who proposed this law was completely anti-dog and was worried about a snowy plover and some blue butterfly. There are no blue butterflies in Pacifica, and no snowy plovers in the hills. So why is Sweeney Ridge going to be off-limits?

Correspondence ID: 1946 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: I donated \$100 to the Pacifica Land Trust thinking I was donating for open space for all.

Then I got a ticket for walking my dog off leash at Mori Pt.

Needless to say, I don't go there anymore.

Correspondence ID: 1947 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

It seems your alternatives, including the preferred alternative over look the serious environmental impact of forcing people to drive greater distances in order to hike with their dog off leash.

Make 8 dogs the number for professional walkers.

Correspondence ID: 1948 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Every time I hike at Mori Point, many dogs off-leash are visible. Even though signs says dogs should be on leash, dogs are permitted to be off leash. This is a terrible disruption of wildlife - in an ever-shrinking habitat. The dog owners who let their dogs run off leash need to understand that the additional stress or outright killing of wildlife by us and our dogs results in death to, and an ever shrinking population in bird populations - from a variety of causes.

Please, keep your animals on leash, and in on-leash areas only.

-Beach at Ft. Funston is only available for off-leash when tide is out, which happens approximately every other week, assuming you walk the same time every day.

-Mori Pt. from March-August is not a good time to walk dogs because of prevalence of ticks.

Correspondence ID: 1949 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Dogs are not meant to be in national parks. I'd like to enjoy the park w/out barking dogs running up to me.

Alternative 'A'+ The entire "Coastal Trail" needs to be a regulated off leash area..particularly since the trail is sparsely populated much of the day + night....

Dogs are trained by responsible owners to come when called and to be social. Individual dog owners should not be penalized to leash their dogs in some areas where there is plenty of open space and where dogs can meet and play with other dogs. It is commercial dog walkers with too many dogs to supervise who gibve dog visitors a bad rap. My dog is a gentle large dog who needs to be off leash a little every day to run and meet other dogs and people. The opportunity to go on the Coastal Trail give me the opportunity to practice commands, meet other resposible dog owners, and allow my dog to run (under voice control). Not having a car, I cannot drive my dog to a dog park that would be large enough to allow him some freedom and not be

confronted by too many dogs in one small fenced-in area. Keep the Coastal Trail ROLA, please!

Thank you to the GGNRA for doing such a thorough and thoughtful job. I appreciate all your hard work. You are all not thanked enough.

Correspondence ID: 1950 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Please make the raw data for the preferred plan publicly available online & in print. Thank you.

Correspondence ID: 1951 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 13:16:29
Correspondence Type: Web Form
Correspondence: I am opposed to the proposed changes to the dog access to the Presidio and the Golden Gate National Recreation Area. One of the main purposes of the GGNRA is to provide recreational outlets to the urban residents of San Francisco and the Bay Area. The proposal would severely limit the ability of Bay Area residents to enjoy our public recreation area. Our national recreation area should be preserved for the use of the urban residents of San Francisco and the Bay Area. It is our backyard.

I have a dog and walk with her regularly in the parklands. During the course of our visits, I see many, many well-behaved dogs enjoying the outdoors with their owners. Some dogs are leashed and some are walking along with their owners unleashed. Every owner that I come across is courteous and cleans up after his or her dog. It is extremely rare to see dog feces in the parks.

Correspondence ID: 1952 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Other
Correspondence: Dogs are a single species. We look for protection of the many species of plants, insects, birds and mammals for our future. Yes, and the protection for people, firm or infirm.

Dogs are an important part of the Bay Area communities. It is essential to have off-leash areas in Marin, San Mateo, and San Francisco.

-Crissy Airfield- Entire area should be offleash. Preferred Alt w/ 1/2 on leash / 1/2 ROLA is arbitrary -

-Fort Funston: Cliff swallows are high enough that dog disturbance non-issue.

Correspondence ID: 1953 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Dogs are a single species. We look for protection of the many species of plants, insects, birds and mammals for our future. Yes, and the protection for people, firm or infirm.

Dogs are an important part of the Bay Area communities. It is essential to have off-leash areas in Marin, San Mateo, and San Francisco.

-Crissy Airfield- Entire area should be offleash. Preferred Alt w/ 1/2 on leash / 1/2 ROLA is arbitrary -

-Fort Funston: Cliff swallows are high enough that dog disturbance non-issue.

Correspondence ID: 1954 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: -There should be a clear way to protest citations

-Research does not support (1999 Hatch report) that dogs are chasing or impacting snowy plover.s But I favor less restrictive measures to protect the plover at ocean beach + such as fences

-Want more studies (in addition to Northern Arizona University study) SF state study about dogs & GGNRA user's coexistence

-Dog owners already have limited areas to take dogs in the park (1%) and you're restricting further.People who want a non-dog experience have the other 99% of park.

Correspondence ID: 1955 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Type:

Correspondence: The city should take back the GGNRA

Dogs without proper exercise are dramatically more likely to misbehave. These legislations will increase the chances of dogs getting into dangerous situations. They will also create overcrowding in the ROLA areas increasing the chances of problems in those areas.

People need to be able to exercise with their dog. This proposal does not provide ample recreation space for dogs + dog walkers.

Correspondence ID: 1956 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

Can you state the scientific studies that back up the supposed impact of dogs on land + plants? As opposed to the impact humans have on environment?

GGNRA should be more than a dog exercise area! I support the plan!!!
*esp. Crissy Field + Ocean Beach!!

Correspondence ID: 1957 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

"Protect cultural resources from the detrimental effects of dog use" - what does this mean? How many dogs "use" cultural resources? Aren't people more likely to commit "detrimental effects"?

Instead of further restricting dogs in the GGNRA, why isn't the Nat'l Park Service looking into what is right with the current GGNRA dog policy, and expanding these off leash areas throughout the rest of the Nat'l Parks?

Fort Funston, Chrissy Field, and the other off leash areas throughout the GGNRA should be reclassified as a new type of Nat'l park in which this pilot is a complete success!

Correspondence ID: 1958 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Other

Type:

Correspondence: Where is our public forum? Isn't this a mandate of democracy?

Concern: Impact on city parks when off-leash dog walking is severely restricted at Crissy Field.

Concern: Definition of "recreational use" does not fully take in the densely populated issues of San Francisco. Pets are a part of the city and need to have recreational opportunities, too.

Concern: Park service writes the plan, weighs public comment, and then makes the decision. Where is the oversight and transparency in the process?

Concern: How is the Park Service co-ordinating with/cooperating with SF City Government?

Correspondence ID: 1959 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,11,2011 00:00:00

Correspondence Other

Type:

Correspondence: Comments

-meeting format excellent. Feels safe and secure. Readily informed. Freely able to give extensive input.

-GGNRA is for people, a very important species. And we love our dogs. C. 60% of all SF homes have dogs (more than small children). We need to have a place to bond with our 4-footed family members.

If you don't like dogs, don't ever be buried in an avalanche, become blind or develop cancer. Dogs play a critical role. We need them.

a. They can run free at Muir Beach. It makes them happy. It makes me happy.

p.s. I'm a member of the Audobon Society.

Correspondence ID: 1960 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,11,2011 14:21:55

Correspondence Web Form

Type:

Correspondence: We are all getting along just fine, please do not impose laws that will not

help achieve what you are looking for. We can work out our own differences, and they are very few given the number of dogs and their loving owners in the bay area.

Correspondence ID: 1961 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 14:53:06

Correspondence Type: Web Form

Correspondence: I am against the new regulations being proposed.

There are as many human factors that have and do effect our environment negatively than there are animal factors.

I have lived in SF for 13 years and have been a dog owner for only the last 4 months. In my 13 years here, I have witnessed 95% positive interactions between dogs, dog-owners, children, and non dog-owners.

Correspondence ID: 1962 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 15:18:10

Correspondence Type: Web Form

Correspondence: I strongly support the Dog Management Plan to the extent that it further restricts off-leash dog use in San Francisco, specifically Ocean Beach, Crissy Field, and Fort Funston. I agree that the current situation is totally unsustainable, and more intensive and thoughtful management is necessary to preserve and maintain the endangered species and recreational benefits of these parks for all park users. As a non-dog owning San Francisco resident who uses these parks recreational and appreciates their ecology, I support any efforts to further restrain off-leash dog usage, including creating areas completely off-limits to dogs. In fact, most national parks and CA state parks that receive this level of visitation ban dogs completely in ecologically sensitive and heavily used trails.

Correspondence ID: 1963 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 16:40:50

Correspondence Type: Web Form

Correspondence: It would be heartbreaking for dogs and dog owners if dogs were prohibited from Bay Area beaches. Especially in an urban area such as San Francisco, where there aren't many places where dogs can run and mingle, it seems critically important that dogs be allowed on the beaches. In Sonoma County, many of the state- and county-run beaches allow dogs, and it seems to be working out just fine. Please reconsider making this policy changes, and

instead continue to allow dogs on the beach. Thank you!

Correspondence ID: 1964 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 17:18:19
Correspondence Type: Web Form
Correspondence: I wanted to send a letter of support for your decision to ban dogs off leash in GGNRA. I support this because it will allow me to once again enjoy the park without the harassment of dog mobs and dog owners. I have been provoked twice by dog walkers with dog packs who treated me as if they owned the park. Both times I simply made comments about keeping the dogs away from me (I have been bitten once by a unleashed dog and am not comfortable around them...not in SF). I do not need to or want to be intimidated by roaming dogs and dog owners which seems to be the case, esp. at Ft Funston. Do not let the Board of Supes intimidate the National Park into changing this decision either. The National Park is FOR ALL but the dogs and their owners (or dog walkers) make it an extremely unpleasant experience and they seem to rule the parks these days.

Thank you. You folks do an awesome job!

Sincerely, STEVYN POLK

Correspondence ID: 1965 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 17:37:55
Correspondence Type: Web Form
Correspondence: As a resident of the outer Sunset, a SanFranciscan for nearly 40years, I have had the utmost pleasure walking and running and surfing on Ocean Beach almost daily. For the past 15 years. I have been walking my retrievers here every day. There is no greater satisfaction than watching my dog run - it is the most natural and wonderful and organic activity- and it also enhances the beach experience for others. I have countlessly heard and watched others marvel at these incredible animals. Both my dogs have been very fast, and my current brown lab Carmen is an Olypian in spirt -and she exemplifies the freedom and wildness of this hallowed place. The bond bdetween dog and man is so full and wondrous - and your denial of a dog's most urgent need (to RUN) is indeed short sighted and just plain WRONG. When Ocean Beach was "created," it was meant to be a place where the free joys of nature could be experienced - and that intrinsically included the right to have a dog run free. You really need to be part of the solution to keeping Ocean Beach our national playground. You have to include off leash areas on this magnificent beach - please restore All of Ocean Beach to reponsible off leash use - and please remember that our dogs represent one the best

examples of coexistence between man and beast, and this bond needs your recognition and approval. Your philosophy and attitude concerning dogs is really not correct, and this document does us all a great disservice.

Correspondence ID: 1966 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 18:13:35
Correspondence Type: Web Form
Correspondence: Please think long and hard about taking away off leash dog use of national park land. The off leash dog parks in San Francisco are crowded already, and if you take away use of these lands they will be much harder and more expensive for city parks to maintain. Also the parks in the city are mostly unfenced and are in high traffic areas, potentially hazardous for the dogs and automobile traffic.

Please vote to keep these areas open for dogs and dog walkers.

Correspondence ID: 1967 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 19:08:53
Correspondence Type: Web Form
Correspondence: Dogs don't belong in flora or fauna habitat.

ALL dogs should be ON LEASH at all times on GGRNA land--and in all city parks and open spaces. Dog access should be limited.

People DO NOT train their dogs. In an urban environment, if people don't have room on their property for a pet to get exercise, they should leash their dog at all times, or not have a pet.

GGRNA land belong to the people, not to dogs.

Correspondence ID: 1968 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 19:15:45
Correspondence Type: Web Form
Correspondence: To whom it may concern,

For the benefits of ALL users, including responsible dog owners I fully support the plan. Out public places can not be allowed to be over runned by one group, namely off leashed dogs, especially at the expense of endanagerd wildlife.

Thank you-Bernie Corace

Correspondence ID: 1969 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 20:33:57

Correspondence Type: Web Form

Correspondence: There are so many wonder State and County parks in the Bay Area. Fort Funston is the ONLY ONE that allows dogs off leash over a large space. I feel like it is not too much to ask for those of us with dogs to be allowed on park out of the MANY on the Bay Area to let our dogs run free. I see that there are 38 park alone under the management of the Golden Gate National Parks Conservancy. It seems more that reasonable to allow dog owners ONE park they can use to let there dogs really run and stretch their legs and enjoy the ocean and sand off leash. Please DO NOT take away the one place in the Bay Area for us. People that want to walk, run or horseback ride can share the space with us or, if they prefer no dogs, have many many other choices. We do not. if you take this away from us we are back to only on leash park or much smaller "dog parks". That is just not fair.

Sincerely,

Leslie Leger Brunt

Correspondence ID: 1970 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 20:37:42

Correspondence Type: Web Form

Correspondence: I am asking you to allow Fort Funston to continue to allow off leash dogs as it it currently exists. This is the ONLY place like in in the whole Bay Area. There are so many wonderful parks but most do not allow dos at all or only on leash. Please don't take this one special place away from us. We have nowhere else like it to go. On the other hand, those the enjoy other types of recreation (hiking, biking, running, horseback riding)have MANY choices if they do not want to be around dogs...again we DO NOT. Please let us have this one special place for our dogs to really BE DOGS.

Correspondence ID: 1971 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 20:52:03

Correspondence Type: Web Form

Correspondence: I was born and raised in San Francisco, I am a forever dog owner/guardian, and I have been an associate veterinarian at the San Francisco SPCA for the past 16 years. I feel strongly that the GGNRA lands that currently allow

dogs should not be further restricted. The San Francisco community has been a leader in advocating animal welfare and the human-animal bond, and taking away access to these areas would certainly have a negative impact. Because this is an urban area, there are very limited recreational areas where we can actively enjoy the outdoors and get the physical exercise we need. Our dogs are our families and as taxpayers and members of the community, we deserve the right to share these public areas. There are too few parks in the city and local Bay Area and the dog accessible and off-leash open areas are even more restricted. Taking into consideration the relatively large percentage of residents with dogs in San Francisco, there are not enough city parks and dog runs for us to take our dogs out to exercise. How can we adequately exercise and keep our dogs healthy if we must keep them on a 6-foot leash at all times when we're outside of our apartments and condominiums. Even the private backyards that some single family homes are fortunate to have are often too confining to actively exercise our dogs. Without recreational activity, just like children, our dogs will be more prone to boredom, anxiety, obsessive-compulsive, and other inappropriate behavior. What San Francisco and the GGNRA should enforce is the responsible use of these public lands. People should not litter and dog owners should clean up their dogs' waste. Parents should supervise their children and dog owners/caretakers should control their pets in public areas whether on leash or by voice control.

Correspondence ID: 1972 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 21:13:07

Correspondence Type: Web Form

Correspondence: I THINK IT'S REALLY SAD. A 2,400 PAGE DOCUMENT! ISN'T OUR CITY IN DEBT ENOUGH. THE TIME AND SALARIES SPENT IN JUST CREATING THIS DOCUMENT AND HOLDING THESE MEETINGS IS LUDACRIS!

WHAT HAPPENED TO THE DAYS WHEN THE FAMILY COULD WALK IN THE PARK OR BEACH AND DIDN'T HAVE TO WORRY ABOUT ALL THIS BICKERING BY SNOBBY PEOPLE WHO ARE LAWSUIT HAPPY?

THAT'S WHAT THIS PROPOSAL WILL LEAD TO...LAWSUITS, CITATIONS AND/OR COMPLAINTS THAT HAPPEN TO BE INCOME/EXPENSES FOR OUR CITY.

THE ONLY THING THAT NEEDS TO BE IN WRITING IS OFFENSES LIKE: DOG BITES, ATTACKS, ETC. THINGS THAT ARE WORTH ENFORCING..

SAN FRANCISCO HAS GONE TO THE 'DOGS'...

Correspondence ID: 1973 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 21:49:29

Correspondence Type: Web Form

Correspondence: I beleive dogs sould be restricted from Muir Beach and Sweeney Ridge. Currently the leash rule is not being followed. In my opinion people bring their dogs to roam free and therefore are not in control of their dogs.

On Muir Beach, this winter, every visit I observed some dogs that were 50-100 yards away from there owners and thus were not in their control. This was on all 4 occasions that I visited. Even when it was raining. Some dogs also crossed into the protected area where people and pets were not allowed.

On Sweeney Ridge, last summer, I used the paved surface to train for a bicycle trip. What I observed was in the late evening, after 5 pm, those walking their dogs disregarded completely the leash rule and let their dogs free. During the morning and afternoon those with dogs free would put the leash on their dog or attempt to when they saw me. In my opinion the dog owners knew they would not get a ticket after 5 pm because the rules would only be inforced during the day, maybe. hence some owners during the day putting leashes on. I was there 20-25 times and this was the pattern I observed.

Correspondence ID: 1974 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 22:02:44

Correspondence Type: Web Form

Correspondence: I use the offleash area of Ocean Beach every day for my dog. I keep my dog leashed until I get there, I clean up after my dog, my dog is always controlled by voice command, and I am a very responsible pet owner. Me and my dog would be devastated to lose this access. IT IS ONE OF THE REASONS I GOT A DOG!!

Correspondence ID: 1975 **Project:** 11759 **Document:** 38106

Received: Apr,11,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I commend the NPS for taking on this important and difficult topic.

I personally love dogs, but am very frustrated by irresponsible dog owners that continually ignore lease laws. My young children have been scared and

almost knocked over by dogs that run, well like dogs!, on the beach.

It's not the dogs fault, that's what they do. Its the dog owners that give no consideration for the safety of others, for the simple expectation that a bounding canine is not going to come galloping through peoples blanket and picnic, and for the fate of the Snowy Plover on Crissy Beach.

Give the dogs an area of the beach to run on that is not traveled heavily by others and that does not harm the Snowy Plover or other protected species. Let them go nuts there, but equally give families and their children the safety of a beach free from dogs.

I also challenge the NPS to enforce whatever laws come out of this process. With no enforcement will come no adherence to the boundaries set.

Correspondence ID: 1976 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:06:34

Correspondence Type: Web Form

Type:

Correspondence: I am urging you not to stop our off lease rights in the San Francisco Area. I do believe that dog walkers should be licensed, and limited to the number of dogs they are allowed to have at one time. They are the biggest abusers of our parks. Due to the number of dogs they take out, they are not able to clean up all the waste the dogs leave behind as well as keep track of their dogs. I have rescued many a lost dog when at Fort Funston.

I also feel that many of the confrontations that happen within on many of our park are do to the increasing number of un-nutered dogs (primarily pit bulls) that are roaming the parks. One way to make money to continue to keep our parks maintained is to start ticketing these individuals as well as other responsible dog owners.

I walk my dog about 5 days a week at Fort Funston and all the people that I know are very good about policing other pet owners and dog walkers that do not monitor their dogs or pick up after themselves.

Correspondence ID: 1977 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Type:

Correspondence: Comments:

There are more dogs in SF than children. They need space to run & burn off energy -- proven to make them calmer and better behaved than walking on

leash alone. Please consider this statistic. The park is for all residents including dogs to enjoy.

Anectotal note: We go to Crissy field with our 2 dogs frequently and often interact w/th non-dog owners who enjoy the dogs that are there. We have never seen people upset by the dogs off leash and or seen a problem with "out of control" dogs.

It is a part of the unique S.F. culture that drew us in as visitors and made us want to move here.

PLease don't change the current rules! Please consider these comments together

Correspondence ID: 1978 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Letter
Correspondence: Comments? (San Francisco)

People in the Bay Area get dogs to motivate themselves to use the GGN Recreation A. If they can't use it and their dogs b/come a burden they will not get/rescue a dog in the next round (5-10 years). --> Less rescued dogs --> more euthenasia --> less need for vets/pet stores = bad for economy also = more obesity

Correspondence ID: 1979 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: San Francisco

Mill Valley + Sausalito have free dog runs

Mill valley--> poop scooping - County has paths - voice control

Sausalito --> fenced - seats for owners + poop scooping

Muir Beach a long time open ocean area - BUT so much time, energy + planning has gone into lagoon restoration & visitors are often folks who - not like most Marin residents - let dogs run free + they chase + destroy ground bird species.

Have a fenced beach area so dogs may run free. Plan a budget for "policing

of the very few who abuse all areas. It makes sense to have closures during Breeding season - nests disruption a real problem. But you will need education about ecosystem - fines not as effective as "perhaps" volunteer guardians or GGNRA personnel.

I think you have made an effort with selected preferred alternatives.

Dogs are many people's children - they are emotionally bound to their owners.

Correspondence ID: 1980 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

Why can no one tell me how much this study cost?

Why is there no public participation in the review of comments?

How can the public be sure that all legal procedural requirements have been followed?

Correspondence ID: 1981 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Why are the studies regarding dog behavior & impact in other areas of the country being used as a basis for this proposal?

Who has reviewed the validity & credibility of the research cited in this study. Is it really applicable to this urban recreation area?

Correspondence ID: 1982 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Letter
Correspondence: Comments

Where are the people in the inner Richmond area of S.F. going to walk their dogs? What is the reason for entirely shutting down Ft. Miley? This area is full of ruins including an old dilapidated army hospital

Correspondence ID: 1983 **Project:** 11759 **Document:** 38106

ID:**Received:** Apr,12,2011 00:00:00**Correspondence** Other**Type:****Correspondence:** San Francisco

Where is the yellow?

Regarding Ft. Funston there should be an off-leash route to the beach so people don't get their arms pulled out. And who cares? Ft. Funston is littered w/ old weaponry that is certainly toxic. Also the "outflow pipe" is raw sewage.

Correspondence 1984 **Project:** 11759 **Document:** 38106**ID:****Received:** Apr,12,2011 00:00:00**Correspondence** Other**Type:****Correspondence:** San Francisco Comments!

The GGNRA was formed to protect urban land from being further developed. Land was set aside to provide open lands for education, recreation + outdoor experiences. Its constituents include bikers + hikers + hikers with dogs. Over the years many areas have been closed to dogs. To restrict this even further will result in too many dogs in the few remaining areas. An urban population has dogs!

Dogs need time off- leash! People need time off-leash, too. Dogs, people & nature can co-exist peacefully. If you need rules to protect us from bad dogs & bad owners - so be it. But don't punish all dogs and all people with dogs for the actions of a few. Always on leash is not an alternative.

Correspondence 1985 **Project:** 11759 **Document:** 38106**ID:****Received:** Apr,12,2011 00:00:00**Correspondence** Other**Type:****Correspondence:** Comments San Francisco

We all pay taxes - dog owners, hikers, bikers, horse people - and we all deserve equal access to our parks.

Places like Muir Beach, Fort Funston have been open (totally open) to dogs for years. Its all citizens' responsibility to be safe - be environmentally friendly and enjoy these beautiful places in common.

The Ft. Funston map is deceiving - it gives the impression of lots of off leash possibilities without being clear of the very challenging trails to the beach which will discourage most from being able to get down + back. And the lg. yellow area has dunes which are also difficult to navigate. This plan will effectively take most peoples ability to enjoy off leash experience despite the way it looks.

Correspondence ID: 1986 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments?

The DEIS failed to support evidence that dogs off-leash provide destruction to the GGNRA more than any other user group.

The proposed plan is very well thought out - balancing the needs of all user groups as well as taking care of the natural habitats and wildlife. Thanks for your amazing efforts.

Dogs need to run as well as we do leash makes this impossible. These proposals read leash, leash, leash leash. Very unfriendly.

Correspondence ID: 1987 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments Background

In Rocky Mt. National Park, Volunteer Rangers are stationed near entrances to provide maps of dog-friendly areas. Those who ignore the rules are informed that a ranger will be called if rules are ignored...Marin enforcement #: 561-5505, Emergency 501-5656

It would make more sense for Park Rangers to police dog owners or walkers who allow their pets to soil trails and then not remove the waste. Citing dog owners sporadically for off leash dogs is not addressing the issue. If dogs stay on trails, no more impact will result than humans hiking.

Correspondence ID: 1988 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other

Correspondence: Comments

Most dog owners are sadly lacking in the impact their dogs have on wildlife. More education is needed. I hike the park areas north of Golden gate. Very few dog owners I speak with are aware that the wildlife are not making their presence known to the dog owner. Many dog breeds & cross breeds are very aware of the wildlife that are present. How can dog owners honor what is necessary for wildlife to remain not-harassed and continue their existence in the same manner we humans would like to be treated. Keep your dog on a leash if the dog travels beyond your immediate control. I always take my dog with me in all the parks north of gg Bridge for safety. Its a necessity especially on the Bolinas + Inverness Ridges.

Correspondence ID: 1989 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: San Mateo pg. 3 Comments

My dog does not impact the environment. She, like I, leaves only footprints. I'd like to see some scientific proof of their impact in each of the areas.

The document has so many pages that it is nearly impossible to learn what is the root problem and what are the proven causes of the problems. :(

Correspondence ID: 1990 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: How Frustrating! Some of the dog people know more about the plans & the current situation than the NPS people here!

The best part of my day is my walk with my well behaved dog. The proposed changes are awful. The "studies" are not based on science. Erosion + bulldozers affect bird nesting areas - not dogs. Dog owners pay taxes - we want to use the areas too. We can all COEXIST!!!

We paid for this study we pay your salaries we have dogs & we say no to your plans.

Removing off-leash dogs completely from Baker Beach is absurd & unnecessary. What harm is being done?

Correspondence ID: 1991 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Where is the science too many might's in your plan we need more off leash space not less.

The vast majority of citizens either have dogs or are dog tolerant - the minority shouldn't get the majority of recreation space.

Correspondence ID: 1992 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: New Lands pg. 5

On what basis has the Proposal and all various alternatives been created.

The validity of the research is questionable and does not pertain to the areas being restricted.

Correspondence ID: 1993 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments:

Good dogs in the City need off-leash exercise to stay well-behaved. Handicapped people with dogs need accessible off-leash areas. Like Fort Funston.

-Document fails to be specific about the environmental impacts. For example is there degradation to Crissy Field sand dunes? If yes, how much degradation? What are all the causes? Do specific birds no longer live at the parks? If yes, what are all the proven factors that have caused this?

-The preferred plan effectively bars use of Crissy Field for off leash dog use

Correspondence ID: 1994 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments?

Have you considered the impact on Crissy Field that will result from leash restrictions in other park areas as a result of this plan?

-Park should consider allowing off leash dogs at Crissy Field before 9am when there are very few users.

-Same comment as above but w/ additional periods such as before dusk for 2 hours or do alternativng weekdays so that dogs & owners can have more ROLA time rather than the drastic cut in time & space.

Correspondence ID: 1995 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments Background

-It seems to me you have spent a ton of money to solve problems that don't exist. Your own records show that dogs have created fewer problems than GGNRA management. You have so far exceeded your authority, that criminal charges should be drawn up for GGNRA managers.

I am not for this I am for the dog - dogs have the right to run free in a respectful way

-Crissy Field is a beautiful place that improves every year. It is already working to have dogs off leash. Keep it the way it is; it works!

-Do not punish the dogs! They need their place too! Responsible dogs & owners can work together to find a happy medium! DON'T HURT! HELP!!

Correspondence ID: 1996 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

Compliance basd management unfairly punishes many for the actions of a few - if a ROLA is changed to on leash wiht less than 75% compliance = simply unfair + possibly unconsitutional

It will be difficult to get non-biased park staff to do the monitoring

If compliance is excellent, rules should be loosened.

A huge staff would be required for enforcement round the clock

People with off leash dogs are park visitors.

Correspondence ID: 1997 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

Dogs are an integral part of the environment & need off leash areas

Correspondence ID: 1998 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Commercial-

Dog walkers should get permits for each dog they walk, regardless of less or more than 3 dogs. The money should be going to the maintnents of dog areas (clean-up - fences etc...)

Correspondence ID: 1999 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: It appears that the park intends to concentrate dog use in small areas so that in the future the park can say the impact in those areas is too intense and close those areas completely to dog use...which is, after all, the real "preferred alternative".

San Francisco

Correspondence ID: 2000 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: -Continue to add visual cues of boundaries to help people understand the rules like the big bird at O.B.!

-Create more off leash areas in Golden Gate Park

San Francisco

Correspondence ID: 2001 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: New Lands (3?) Comments

-Please consider all public comment given on this issue in the Fort Funston rulemaking, the 2001 public hearings the ANPR and the prior correspondence generally received on the issue of limitation of the 1979 pet policy.

-Please contact and reopen the 2001 hearing comment by person who attended the hearing but were not allowed to present their comments. The hearing was postponed/continued based on a vote to take no action and anticipated further hearing before any action was taken. The people who came to speak at that hearing should be given an opportunity to present their views as they left the hearing based on the assurance that they would have another opportunity if action was to be taken.

Correspondence ID: 2002 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 09:15:40

Correspondence Type: Web Form

Correspondence: I moved to San Francisco a year ago and I have been so impressed by how well the off-leash dog policy works. It's one of my favorite parts about this city. Please do not change this policy -- for the behalf of the dogs who need to run and stretch their legs and for the people who need to as well.

Correspondence ID: 2003 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

Why not consider more liberal off-leash by time of day- dawn- 9:30 am, 4:30-sunset

How do you plan to enforce this plan? -Have fines? -Hire more police?
Where does the \$\$ come from

Please leave Rodeo Beach as is. We love it! Support "C".

My dog likes the park plan for Crissy!

Page G-1 lists specific problems and # of occurrences. The numbers are extremely low compared to the number of visitors such as 15 wildlife disturbances. That is just a silly number.

Correspondence ID: 2004 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 09:18:19
Correspondence Type: Web Form
Correspondence: Hello,

I've been going to Fort Funston for almost 20 years with my dogs. While there are many parks in SF - Fort Funston has always been the "go to" place for people who want to take their dog to the beach given that Ocean Beach doesn't allow dogs off leash nor do most other beaches within the City proper and up and down the CA coast.

In my experience - all of the dog owners are respectful of the beauty of Ft. Funston and keep their dogs in control. In addition - poorly behaved dogs are not tolerated by anyone.

While I appreciate the desire to preserve this stretch of beach and cliffs and keep them pristine and suitable for all types of wildlife - the reality is that this land sits at the edge of a very crowded City. There are hundreds of miles of coastline all along California that restrict access and don't allow dogs. I love birds and wildlife but as far as I can tell allowing dogs at Ft. Funston does not prevent nesting birds, foxes, ravens, dolphins, whales, seals and other wildlife from also using Ft. Funston.

I have also rarely seen people at Ft. Funston without dogs. The terrain is difficult, the beach is a little wild and families tend to go to Ocean beach or other more easily accessible beaches.

If the laws were to be changed to restrict dogs to specific areas rather than the current and preferable situation in which dogs are allowed everywhere under voice control it would require the park ranger to issue many citations and ultimately not be enforceable given the budget and priorities of the National Park Service (just a guess).

I feel strongly that Alternative A is the way to go.

Best,

Andrew Goldfarb San Francisco, CA 94114

Correspondence ID: 2005 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Area available for off leash dogs at Ocean Beach should be more than just north of stairwell 21. This area is too small.

You can only stand with your dog off leash in the small yellow square - you can't walk with your dog off leash.

The NPS has confused the difficult application of its mandate in trying to increase usage of the park areas and then seeking restrictions of one user group based on the impact of the overall increase in human use. The NPS in its DEIS should consider whether it can possibly achieve attraction of the wildlife it is trying to encourage while at the same time increasing the confrontation of people. Assuming somewhere the NPS locates some competent evidence that dog walkers have greater impacts than others (which it has not to date) NPS should consider whether the marginal difference in impact is at all significant in comparison to the overall impact of the high user presence. (If for example we decide I have a bit more adverse impact when running rather than walking) should we preclude runners or simply conclude that the minor difference is not significant compared to allowing humans at all?).

Correspondence ID: 2006 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Its counter productive to stop people from enjoying urban park areas to preserve wildlife that wouldn't thrive well next to a large city anyway + has lots of other shoreline. It alienates urban people from nature.

If wildlife seen, e.g. coyotes or lynx, they get rid of them from urban areas so its not going to be truly wild anyways letting people enjoy parks opens their hearts to nature...overall conservation is better served by letting people use urban parks

Many people won't go out without their dogs - self conscious seeking human company when along- dogs bring people from all social strata together in nature

Correspondence ID: 2007 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

Why are the dogs being singled out? I am more inclined to see people trashing the parks, defecating, littering. What is the proof that dogs are so destructive? Come on!

No dogs on our public beaches. Unhealthy, unclean, and unwanted by children, swimmers, and those who lie down on the sand.

Chrissy Field is one of few places to walk + have a dog without a lead, I've one complaint one year from a park flat hat, she yelled at anyone to get dogs (12 # + 8 "high on lead)" I would say she overreacted. I've seen walking, bike riders, runners, baby strollers, never seen a dog fight. Some thoughtless people have left dropping but that doesn't speak to dogs off lead. Calm down no ones perfect, what improve with dogs off lead. -Kevin Howard

Dogs' mouths are cleaner than humans'. We clean up our poop. Small children dirty water + are often dirty, rude, + unsupervised my dog is under my control. Do you control your kids?

-I wish everyone would be more reasonable. We can't ruin nature so some dogs can get exercise. Dog owners need to show more appreciation for being allowed in a national park w/dogs.

Correspondence ID: 2008 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: Dog walkers typically charge between \$15-25 per dog perday. If dog walkers are limited to only "6" dogs, the price to have a dog walked will have to jump up to \$45-70/ dog-day. Is this fair for dog owners who pay to have their dogs walked while they are at work?

Common elements

Correspondence ID: 2009 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments (SF)

-It's a recreation area, not a wildlife preserve.

-Dogs + other recreational users can share.

-Dogs are not the problem, lack of training is.

All dog owners say "My dog is friendly"

-We need safe dog-free areas for humans to enjoy safely.

-You should stay home with the doors locked if you want to "feel" safe

Correspondence ID: 2010 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: The preferred alternative attributes far too much damage to dogs and their owners. If anything, more acces should be available for responsible off leash activity.

There is much attributed to dogs with NO documentation at all! Or such a tiny amount that does not represent the average experience of off leash dogs. The restrictions will congest the off leash areas & make them miserably overcrowded!

The "Compliance-based management strategy" casts a long shadow over the rest of the plan

Correspondence ID: 2011 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 09:51:49

Correspondence Type: Web Form

Correspondence: I am speaking for myself, not the Ocean Rider membership. We are located in Muir Beach, as you know, a popular local place for families to come with their pets. As a member and spokesperson for Ocean Riders, as well as my personal beliefs, I will say Natural Resources are the number one concern which must be protected. But my personal hope is there can be a compromise rather than an either/or decision for entirely restricting dogs at Muir Beach. I see the major issue is lack of funds and man power to enforce rules. It's easier to say no dogs and be done with it. Rather than start out with such severe restrictions I would love to see a trial where dog owners can police themselves to see if rules can be followed that will protect the natural resources yet keep the beach open to dogs. Many of us already

remind people to put their dogs on a leash when we are riding on the trails, saying privileges can be lost if the rules aren't respected. Some of our members spend time cleaning trash from Muir Beach while their dogs play. Promoting personal responsibility is key to success.

I would like to see the following: Dogs on leash in parking lot until they get to the open beach; barrier from bridge to the creek outlet along the sand dune protection area on beach side of the creek; doggy disposal baggies at the boardwalk crossing in parking lot; No dogs in creek (as is now the law); Possible limitations such as weekend exclusion or mornings only (no dogs); or alternate days for families who have children who fear dogs. If dog owners are given the opportunity to monitor and educate each other to keep the privilege of dogs on the beach some of the Park Service concerns might be addressed. If it doesn't work, then the natural consequences would be to move to the next step. At least you've given them an opportunity. Thank you for this opportunity to comment.

Correspondence ID: 2012
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

More rules and restrictions do not make a better society. Let those complainers go to a dedicated beach for dog-dislikers (and Audobon society too)

Rodeo Beach - It's too ambiguous "crest" of beach. Keep Alt. A as ROLA. Even without dogs on this beach stats show low shorebird use due to high #'s of people, kites, football games, etc. Beaches with more than 20 people/km and no dogs still have low shorebird use. DO ADD fence at lagoon keeps adults, children & dogs out of lagoon. Increase enforcement if necessary.

-Muir Beach -EIS doesn't substantiate recommended alternative environmental evidence should steer decision making.

-Homestead Valley trails have always been maintained by volunteers - not NPS - you ask the volunteers whether dogs are causing irreparable impacts.

Correspondence ID: 2013
Received: Apr,12,2011 09:58:16
Correspondence Type: Web Form

Correspondence: I strongly support the national Park Service's dog management plan for the Gloden Gate National Recreation Area. Protecting the Snowy Plover and other fragile natural resources should be the top priority of the plan. There are already existing plenty of options for dog owners who want their dogs to be able to go off leash. And owners who want to bring their dogs to the National Recreation Area can live within the leash rules proposed in the new plan. I hope you will stick to your guns. This is a good plan which will preserve the great and fragile natural beauty of the coast for everyone. I strongly support the plan.

Correspondence ID: 2014
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

Compliance--> How will this be documented? 70% figure- how calculated? What's to stop NPS from making up numbers of non-compliance infractions?

-With all dogs on leash & regulated to specific trails, there is going to be more congestion & traffic (both humans and dogs) --> this will inevitable create more dog on dog incidents, dog leash reactivity & problems with non dog park users. Recipe for disaster for all the 100,000's of SF bay dogs & their owners.

What is next? A ticket for not wearing sunscreen? First, the deer kill, then the oyster farm. Leave our beaches alone!

So there's 100,000's of Bay area dogs. That means most of them are being kept happy NOT ON THE BEACHES. Shore birds ARE negatively impacted. Dogs can go other places.

Common elements

Correspondence ID: 2015
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

If you plan to ban dogs from Baker Beach I wonder if you might also ban the naked people too!

KYE - I have a well trained 10-yr old lab + I walk her almost every day on Crissy Field. I pick up after her. She needs to run, so walking her on a leash wouldn't do it. I am a senior citizen + can't access (mobility issues) the proposed ROLA areas. Rental bikes on the Promenade are more of an issue + were not originally supposed to be there in the Crissy Field restoration plan.

KYE - I would like to see a certification program for having dogs on voice control, with tags + agreements signed by owners with hefty fines, to keep them responsible, out of WPAs + how about certain hours for off leash say 7-10 A.M.

Dog owners all say "my dog is friendly". Why did I get bitten by a "friendly" dog?

Incidents like you describe (being bitten) are a rare event. You can't punish 10,000 dogs for one unfortunate event. I got food poisoning from a takeout burrito place - I am not proposing all Mexican establishments are shuttered as a measure of safety.

One dog bite is too many.

Correspondence ID: 2016 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 10:05:21
Correspondence Type: Web Form
Correspondence: Even though I love dogs, I support the whole plan, our wildlife and flora is too precious. Please pass the whole plan as is and then enforce it.

Correspondence ID: 2017 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 10:10:01
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean

I am writing to take issue not only with the proposed "preferred alternatives" in the DEIS, but to challenge comments of yours I read in SF Gate this morning, April 12th. You state that there is some sort of "untenable" problem that exists with off leash dog walking in the GGNRA. I have not seen evidence of that. You say that a bird is in peril, but I've seen no science on that in any of your supporting documentation for the DEIS plan. Where is the evidence for your claims??? There are more incident reports about people causing problems in the GGNRA than dogs. There is no science to support the draconian changes the park is proposing. None. This attempt to

take the GGNRA away from dog owners is reminiscent of the attempt to end oyster farming in Tomales Bay. The federal government is selectively using bogus science to support a desired end.

I live in Muir Beach, smack dab in the middle of the GGNRA. I interact with people in it every single day. I walk my dog off leash on the one single trail that still allows it, and I use the beach daily. I have never, not once ever had a problem with a person who was bothered. I've never seen or been involved in any conflict arising from dog lovers and non dog lovers using the GGNRA at the same time. I see how dogs and humans are getting along. There are never any problems, save maybe the person here and there who doesn't like dogs and has a difficult time being around them. There are plenty of places (99%) in the GGNRA that don't allow dogs for these people who don't like them. People who want a dog-free experience have 99% of the GGNRA at their disposal. Dog owners only have a measly 1% of the park!! The GGNRA needs to serve the recreational needs of a very densely packed urban area. It is not fair or sane or reasonable to take away the tiny 1% that dog owners are able to use for their enjoyment and the enjoyment of their families and pets.

I see the REAL impacts to my little corner of the GGNRA, and they are not from dogs. Those impacts are from HUMANS.

Every time I go to the beach, I witness people jumping the fences with their bags and backpacks and traipsing through the newly restored lagoon. They ignore signs. They set up camp within a seemingly closed area in the dunes. They take their children in to the bushes that surround the wetlands to urinate because there is not proper signage to keep them out and they are too lazy to walk back to the lot. There is NO ONE on the beach now enforcing existing laws that keep people and animals out of closed habitat. How can the GGNRA say that there is a failure of existing rules, when they don't enforce them in the first place??? People are dragging their kids on boogie boards in to the lagoon. It's people, not dogs, who are cutting limbs off of trees in the lagoon area to use for firewood. I watch kids kicking away at the hillsides and parents dragging their kids down eroding areas of dune and dirt just for fun. No one stops this activity. I have pictures of ALL OF IT, but this form doesn't allow for attachments. I suspect a court case would. My best friend's three year old got third degree burns on his feet from a fire that was left to smolder outside of the designated rings and buried in the sand. This poor little boy was just playing in the sand and walking and because of unregulated HUMAN activity, was severely burned. And it is naked men who are exposing themselves to young children on Muir Beach and making a big portion of the beach unusable for families. As someone who lives in Muir Beach, the biggest bummer here is BY FAR the naked people. Oh man.....

Any notion that dogs are causing problems that are bringing us to some sort of "untenable" crisis point, at least in Muir Beach, is absurd. It is abundantly clear to anyone paying attention that it is human activity that causes the problems of degraded environment and it's human activity that threatens wildlife and diminishes the natural beauty of the park. All it takes is a stroll from one end of the beach to the other on a busy weekend. Dogs-zero problems, Humans-multiple.

Your plan to send people to Little Beach is absurd as well, and I've seen no EIS for that plan. You cannot suggest as part of your DEIS that Little Beach is a reasonable alternative destination. It's only accessible by walking across Big Beach, or driving on private roads to an access that has NO PARKING, no facilities, no garbage cans and most of the time no sand. This alternative that is cited in your DEIS is completely unacceptable and needs an EIS of its own. It will be fought vigorously by the community of Muir Beach. Most of the beach is private property, up to the mean high tide.

I want to see SCIENCE. If the NPS is wanting to eliminate dogs from the picture, I want to see hard science that proves that there is a valid reason for this. And I want to add that the GGNRA was established and is supported by tax dollars to provide recreational activities to a very densely packed urban area. We all pay taxes to support this park system. This isn't a wildlife preserve or a pristine wilderness. It's an urban park. It is supported by all of our tax dollars. It's even supported by generous donations to the National Park by people like me and my husband. Those donations would stop altogether if the park makes these changes, because we will no longer feel like we have a responsibility to care for and provide for the park. The GGNRA established dog rules at the inception of the park that work beautifully. Just enforce the existing laws instead of spending a fortune to create new ones. What a waste of money!!!

Ok, that's enough for now. I'll probably have to write again.....

thanks for your time,

Laura Pandapas Muir Beach.

Correspondence ID: 2018
Received: Apr,12,2011 10:22:46
Correspondence Type: Web Form
Project: 11759
Document: 38106
Correspondence: Please do not limit the off-leash areas. It would be a disaster. I have always been so proud of the city and how dog-friendly it is. Dogs do not cause problems. Irresponsible owners cause problems. All the owners that I have met at the dog beaches and off-leash areas are very friendly and responsible.

The dogs are under control and there are very few incidents. It would be horrible for the responsible dog owners and blameless dogs to be penalized for the actions of few.

Correspondence ID: 2019 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: I have walked my dogs with other dog owners at Crissy + Ocean Beach over 3 years. Dog walking builds community. I have never seen a negative incident. Dog owners pick up other dog's poop, garbage + call about stranded seals.

Dont punish the many for the few. There are responsible people in every group- bikers, walkers, picnichers, families, joggers.

This is a recreation area, Dog walking is MY recreation. -Taxpayer, SF Resident, proud dog owner

Please keep our dogs off-leash!!!

-Let's spend a little more time dealing with trash and the people effect on these areas.

Correspondence ID: 2020 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Letter
Correspondence: New Lands Pg. 2 Comments

I support the prefered alternatives. When 12 dogs are running off leash it becomes a problem.

-Please do not allow Mori Point to become another "Ft. Funston"

-Dogs love and NEED to run. Keeping them on-leash is cruel and unusual punishment

-If dog guardians can maintain the current level of off-leash aresa, new lands are not necessary.

Correspondence ID: 2021 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00

Correspondence Type: Other
Correspondence: Comments

(1) The massive destruction is caused by the very limited space for dogs, we need our whole beach back and Landsend.

(2) GGNRA is not just a local recreation resource - it is a regional resource. I come from Palo Alto (35 min) to give myself the opportunity to hike while my dog gets exercise that she can only get off-leash.

(3) We need campgrounds for owners of dogs (families need for dogs) background

Correspondence ID: 2022
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: San Francisco

How many people use Ft. Funston w/out dogs? Will the use drop to 1% of what it is now? This is a park not a museum!!! I need this as much as my dog!

-I recommend leaving Ocean Beach south of Sloat to Ft. Funston off leash. There are very few people using the beach there except for people walking their dogs & there is no nesting/vegetation to disrupt; only manmade rip-rap (concrete, etc) & cliffs. The cliff swallows are in the cliffs, not on the beach.

Ditto to above.

I enjoy walking with my dog at F.F. Its much more fun than standing around in a dog enclosure.

Please leave Fort Funston exactly as it is. It's heaven for people and their dogs. Thank you.

Single people won't go without their dogs to connect with other dog people - especially elders.

Ocean Beach should have some sign or marker along beach (not just at stairwell) indicating boundary between on-leash & off-leash areas

Correspondence 2023 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,12,2011 00:00:00

Correspondence Other

Type:

Correspondence: -Need to document - number of instances of current off-leash dog walking damaging environment, wildlife, restrictions of other recreational users.

-What are the problems the document is trying to address? What is causing the urgency - specific issues.

-The coastal trail adjacent to Ft. Miley + the Legion of Honor needs to be a regulated offleash area.....

-Please preserve our parks and wildlife for many generations to come. It's not worth being able to walk a dog off leash for a while.

Common elements

Correspondence 2024 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,12,2011 00:00:00

Correspondence Other

Type:

Correspondence: Comments San Francisco 3/7

Why not have TIMED sessions for dogs to be off leash at Baker Beach - say 7-10 A.M. only? Then maybe no dogs. That would give dog owners a chance to exercise their dogs, and then the beach is free of dogs the entire rest of the day. China Beach, next door, allows no dogs at all, so birds can go there. Better screens could easily be installed to keep dogs out of the vegetation next to parking lots

Thank you for holding these sessions. The "preferred alternative" is very limited. -Are there any dog avocates on the GGNRA board? -Human usage or monitoring i.e. garbage has substantial impact. Who monitors that? - Snowy plovers in Pt. Reyes didn't succeed due to mercury not dogs. -This is a recreation aras for humans + dogs

A recreation area for humans must include safety, especially for the disabled. Keep parks dog free.

Correspondence 2025 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,12,2011 00:00:00

Correspondence Other

Type:

Correspondence: Comments

-Instead of no dogs on east beach please allow dogs on leash - this will not disturb people on the sand + extend dog walks + joy!

-Why? What is the problem with the current program at Crissy Field -We agree - keep the status quo

-Such a special dog culture in SF - dogs are happy + so are their owners. Most are responsible and support the parks. Limited activity is NOT good for dogs.

-Most people who walk dogs off lead pick up trash as well as feces - we are helpful!

-Walking my dog for many years and I don't see dogs hurting the environment

-Protect public health @ bathing beaches from fecal parasites + other.

-Dogs should be allowed on East Beach - Those that swim can then shower.

-Current rules are not working. I routinely see them ignored, either thru inattention or disregard.

Correspondence ID: 2026 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: San Mateo (I) Comments

So much land. It would be wonderful to have at least one large area where dogs + their humans can play- off leash.

My interest is in the entire GGNRA where less than 1% is currently open to dogs. As part of an urban area, dog walking areas, including off leash, are important for recreational benefits of people and their canines. Leave the current spaces available and clarify their use to reduce conflict. With over 18 years of recreating with my dog(s) under voice control, on a daily basis in the GGNRA, I don't believe that the conflicts are as egregious as reported by the GGNRA and that they can be remedied without leashing dogs.

NO DOGS and NO SMOKING as well on our Public beaches. Unhealthy

and unsanitary as well!

-Please create more dog free areas . (Enforced dog free areas) Much needed.

Please create/designate some area for ROLA rules, so dogs may have the access to RUN, EXERCISE, PLAY.

Correspondence ID: 2027 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments Background

Improve barriers to protected areas. People have these impacts (noted) along with dogs. Focusing on banning dogs or reducing their areas to roam is missing the point. Yes. It's important to protect + maintain wild areas - natural plants, birds, however there must be a better solution than diminishing space. Dog-owners + dogs need these areas (together) to maintain health bodies + minds. There are many dog owners in this area. Would we ban families + children?

-Educate those afraid of dogs - they are missing out on the value + benefit of dog companionship.

As a nature lover- Audobon society person I support Plan A.

This plan is one-sided AGAINST dog owners. There should be beaches for both parties in this discussion! (or just drop this ill-advised plan).

Correspondence ID: 2028 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: S.F.

GGNRA has not taken care of the land. They have - poor signage - bad fencing. Insufficient trash cans. So how much more will it cost Bay area taxpayers to care (properly) for this increased area to tend.

Please create a way to separate dogs from human that don't want to encounter dogs. Please also make it clear which areas are off leash w/signs + fences. Thanks :)

2 weeks ago. I went for a walk South of Sloat for 1 mile or more. Upon

return decided to count dogs last 1/4 mile. 54 dogs w/owners, no (rare) leasher and NO dog commercial walkers. It was too many dogs & not enough OCEAN.

If more of Ocean Beach & Fort Funston Beach was open to off-leash dogs, the density of dogs in any given area would be much less. Restricting off-leash dogs to small areza is not practical and will cause problems.

Beaches are, quite simply, no place for dogs. +

Beaches aer a classic place for dogs and people.

Correspondence ID: 2029 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: SF 3/2

In Santa Barbara beaches "NO DOGS" allowed. Why not here !?! -"Go back to Santa Barbara"

We need a public hearing - there is not enough time to be heard.

Public hearings- we need more time -

Alt. "A" no action 1979 Pet Policy has served us well for decades -"No it has served 30% of humans badly"

Why can't dogs share PART of the space? Considering the amount of dogs in the Bay Area is undeniably large isn't there a way to SHARE RESPECTFULLY?

Correspondence ID: 2030 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Background

Baker Beach: No dogs Really? I am there with my dog at least 4x's a week and we and the other dog people are picking up the trash (esp. Mon. mornings) of the people who used it on the sunny weekend day. Leave things as they are please: Families w/kids with and without dogs are there too - enjoying their own and other dogs - everyone socializing nicely for the most part. It is great open space for all! Dogs, people, kids, birds....We are

all loving it. Why change something not broke???

Correspondence ID: 2031 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

I support the proposal. I would like to add that I do not go to the beaches anymore because of Dog poops everywhere. -"I agree" -"Good stay home!!"

I don't like seeing off-leash dogs going off-trail and trampling plants. Often I've observed the dogs defecating, unbeknownst to their owner.

Why not ban all life from our parks? Squirrels Rabbits birds and deer poop too. Why not ban them too?

And why not ban people why you are at it? People are plant trampers!

Where does the dog shit go when placed into a plastic? Who is responsible for the unhealthy handling of this shit?

The city should take back the GGNRA

Correspondence ID: 2032 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Letter
Correspondence: San Francisco Comments

(1) How will you enforce?

(2) We need more off-lease options but with time limits - sunrise - 9:30 AM for example. Few kids, elderly around then.

(3) less of lease options = more density & problems

(4) Do away with "Compliance based management" - how is this monitored? Very \$\$

-Support the preferred alternative for Crissy. It maintained large areas for off-leash dog walking while maintaining adequate leashed areas + non dog areas. It is a fair balance + compromise.

Correspondence ID: 2033 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: New Lands Pg. 4

How is this plan consistent or inconsistent with the granting of lands to the NPS?

What is the definition of "recreation" as it was intended in the land grants to the NPS?

Where is the research that was undertaken on the foregoing in creating the Alternatives?

Correspondence ID: 2034 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: I love dogs, but they need to be on leash in our parks. Dog walkers with 12 dogs off leash - as I have seen numerous times - cannot manage their dogs, the feces, or their behavior.

Professional dog walkers should be limited in number/maximum of 4 dogs - and should pay a fee as other vendors do. Uncontrolled dogs are a threat to native plants as well as children who use the parks. -I agree

Dogs belong off leash at Crissy Beach. If you don't like, go to any other beach - there are plenty!

Correspondence ID: 2035 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 11:40:48

Correspondence Type: Web Form

Correspondence: I fully support the proposed restrictions on off leash dogs in the GGNRA. It has been a long time coming.

I have 2 small children and I feel like I can't use the Chrissy field beach due to off leash and aggressive dogs. Dogs often bark and target small children--making the beach unusable. And, dog themselves get into brawls off leash and it is dangerous for nearby children and people.

Voice control is a joke. I have witnessed many incidents of people being

threatened and scared by off leash dogs. There is currently no place on Chrissy Field for people to go who do not wish to interact with off leash dogs. I have tried to go to the nature preserve area during certain times of the year where dogs are supposedly not allowed off leash and even there dogs are off leash.

How many people with feel scared and threatened and possibly bitten before this policy changes?

I currently live near a SF park with a fenced in dog area--this is the only way that this park is usable for people with small kids. Without a fenced in off leash dog area--most other parks in SF are unusable because people take their dogs off leash --whether it is permitted or not.

I would like to stress that the new policies must actually be enforced for people to feel safe from aggressive dogs.

I keep reading complaints from dog owners about the proposed changes--but they have no argument for why people who do not wish to interact with their off leash dogs should feel excluded from the GGNA. Every dog owner says--don't worry my dog won't bite you! I don't feel like that is a good answer when my children are being barked at and feel threatened. And, why should I have to take that risk?

Correspondence ID: 2036 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

Making East Beach totally barred to dogs is impractical & inappropriate. Go there early in the morning, 7 days a week, & 95%+ of the people using it have dogs!

-The beach at Crissy is presently not acceptable for enjoyment by non-dog walkers. ITS A TOILET!! -"This is a gross exaggeration!! and YOU know it!" -"Not true"

The East Beach is disgusting. Unusable for anything but dog walking. 3/4 mile long section right nearby!

Correspondence ID: 2037 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence: Other

Type:**Correspondence:** New lands 1 Comments

-Even if "ideal alternatives" are adopted then dogs off leash have been given a bad alternative. More dogs in smaller areas will create more problems - not solve them. Eventually we will not be allowed to have our dogs off leash - ever- anywhere.

-Assume that off leash dog walking currently exists on all "new lands" because it does.

-I'd like to visit a park/beach and know that I would not encounter dogs or their urine + feces.

Correspondence ID: 2038 **Project:** 11759 **Document:** 38106**Received:** Apr,12,2011 00:00:00**Correspondence Type:** Other**Correspondence:** Comments

Please preserve our parks. If this means less dogs off leash, then that should happen. It seems unreasonable to destroy (possibly permanently) nature for off leash dog walking.

Marin County is 2/3 open space. I believe the birds are well represented. Dog owners, unfortunately, are not. This plan is unfair. -Every open space area isn't the same habitat, niche, or equally used.

It would appear that all alternatives were NOT considered. There are areas which would qualify as appropriate ROLA areas (ie no endangered species present) which have not been marked as ROLAs. For example, the mowed lawn on the Parade Ground of Fort Baker (which is entirely encircled by roadway. Why NOT add a ROLA here to preserve balance between dog-owners + non-dog owners in the GGNRA?

Correspondence ID: 2039 **Project:** 11759 **Document:** 38106**Received:** Apr,12,2011 00:00:00**Correspondence Type:** Other**Correspondence:** Comments San Francisco

I don't even own a dog but I truly enjoy seeing dogs run off-leash at Fort Funston. It's a great place for them to socialize. I've gone daily for 5 years and never been attacked, even though I am a little afraid of dogs. Please

keep this great space open and don't waste our tax money on policing this silly new policy.

I have not seen any references (in th report) that GGRNA have for people (w/dogs) who have limited mobility (ADA). The map indicates the walkways are further away on the new plan.

WRT People of limited mobility: I recently had a stroke. It was very difficult to find a park free of dogs off leash where I could walk (unsteadily) with safety. Park are for people first (well or sick).

Financial impact: What does the report offer as documentation? 0

Those who fear dogs can have some beaches, but not every beach. This plan is WAY too extreme!

Correspondence ID: 2040 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 12:05:43
Correspondence Type: Web Form
Correspondence: The GGNRA Draft Dog Management Plan / Environmental Impact Statement is an 1800 page, in depth review of the environment that makes up areas of the GGNRA.

It is NOT an indictment of the current dog walking situation or any type of meaningful support for changing the status quo.

For example on Page 230 of the Impact Statement is a chart showing RECORDED INCIDENTS INVOLVING DOGS IN 2007 AND 2008. For 12 different park sites over 2 years they show a total of 563 incidents. That is an average of 2 per month per site. If you remove Stinson Beach (338 incidents) and Tennessee Valley (109 incidents) from the total, there were on 116 incidents for the 10 remaining park sites over the 2 year period. That is an average of .5 incidents per month.

If the GGNRA want to preserve the pristine environment of these park sites, they should close them entirely. People do far more damage then dogs.

I strongly oppose the proposed GGNRA Draft Dog Management Plan.

Correspondence ID: 2041 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other

Correspondence: Comments

Well-behaved dogs need off-leash areas to be well-behaved dogs!! I am a handicapped person and cannot walk my dog on a leash. I need places like Fort Funston to get my exercise. My dog is company and protection.

Correspondence ID: 2042 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 12:16:37

Correspondence Type: Web Form

Correspondence: I am a San Francisco resident, dog owner, and parent of two young children. We love to go to the beach with our dog. Crissy Field is one of our favorites because of the great views, relatively gentle waves, and lagoon for splashing around.

As a longtime dog owner, and someone who was actually among the crowd at the infamous meeting in the Presidio years ago, I appreciate the deliberation that went into your pet policy. That said, I'm still not happy with the options you've created for dog-owning families in the city. They're not realistic, you don't have the staff available to enforce them, and they just won't work for our city.

At Crissy Field, please don't ban dogs from East Beach, where we like to picnic with our kids. 10E seems more reasonable -- I hardly ever see humans or other wildlife using the vast, grassy former air strip. A version of 10E where dogs are allowed to swim along the shoreline of East Beach, but are on leash above the water line seems even better. Or, follow New York City's lead and have certain hours when dogs are restricted to leashed status, and others when they can frolic in the water.

At Fort Funston, where I'd estimate that 99% of the weekend visitors have either a dog or a glider in hand, you've barred off-leash dogs from the land surrounding the trails down to the beach. I would recommend a merger of 16E+C to more reasonably reflect the use of this park, and still enable a dog-free zone to protect wildlife and the occasional horse rider.

At Ocean Beach, I think your preferred option is reasonable, and balances wildlife protection with recreational opportunities.

Thank you for your consideration, Amanda Kahn-Kirby San Francisco

Correspondence ID: 2043 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Type:

Correspondence: Comments San Mateo pg. 2

-Try one entire park with no dogs allowed. Simple + easy to understand.

Question? Where does dog shit go? Is this a public health issue? Follow the trash cans...is this going into land fill? Are fellow humans separating this dog shit? What is the solution? Charge people that own dogs that leave behind this shit? Why are our tax dollars paying for this health hazard? Signed by a surfer from the 60's! We love surf, sand, and sun when it is clean to touch! Peace.

Human beings leave trash, cigarette butts, beer bottles, plastic, fishing line (that ensnares the birds) & grafitti - My dog does non of that!

"Surfers Piss in the ocean!"

Correspondence ID: 2044 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: SF 3/2

For the nondog people there could be small areas like the ones proposed for off leash - it would be more in keeping with population demographics to give them the small areas without dogs instead of the huge percentage with dogs along with dog tolerant people.

I agree that commercial dog walkers have a permit to walk their dogs, and use the money to maintain the parks.

Dogs do not interfere with the bank swallows they are up to high and do not use the beach. They (the birds) get their water and bugs at the lake. Why are you using this bullshit again?

Correspondence ID: 2045 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

Handicapped people need off-leash areas for their dogs. We need more areas not fewer!!!

Oakwood Valley To better accommodate more users and a longer walk, why not connect "Alta" and "Oakwood" Fire road?

Baker Beach Morning & evening weekday only off-leash would not conflict the visitor experience (busiest tourist time)

Crissy Field: (except promenade) Weekday only, 9:30 -11:30, 2-4 are least busy time with other users, therefore should be off-leash both on east central beaches and airfield.

Correspondence ID: 2046 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: -70% compliance is not very compliant. I would expect more restrictions if the compliance were to dip below 95%.

Most of the people complaining about off leash dogs have an irrational fear. Maybe the solution is to have dog education classe where people learn to hang out with friendly dogs. It seems this "fear" is the real problem. - Extremely true with last statement - the dog is not the problem.

-Your proposal fails to identify all things that impact the land such as very strong winds that blow away sand, rip out plants, and wash garbage ashore. Add a comparison of the other factors, not just dog impact.

Correspondence ID: 2047 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: The meeting format is excellent, letting the public feel safe and free to express all their opinions. Excellent orientation, wonderful personal attention, and many ways to give input. Thank you. "I so agree"

Suzie was informative + patient + understanding of the emotional nature of this debate. I only wish the rest of the GGNRA was as sensitive to the needs of dog guardians in the bay area.

Dogs should be allowed in campgrounds on leash!

Elements common to all action alternatives is a trap door in alternative E. For those of you dog-friendly decision makers- don't be fooled! No action!

Correspondence 2048 **Project:** 11759 **Document:** 38106

ID:
Received: Apr,12,2011 00:00:00
Correspondence Other
Type:
Correspondence: Comments

-The dogs & people experience a lot of joy while appreciating the land. People are off-leash too - a greater sense of how beautiful it is happens then.

Birds also feel. When trying to get nourishment for long migrations and potential predators (dogs) chase them, they get scared, have to move, and living gets so much more difficult. Their numbers are declining.

People also feel. Let us all enjoy the parks without fear of dog attacks. People need to exercise somewhere safe and dog free.

Birds have much more freedom than dogs & their owners. People scared of dogs have plenty of places to go. What next? Tickets for not wearing sunscreen?

Comment on above: Dog owners routinely have dogs off lease in on-leash areas. Where are the "Plenty of places" we can go?

Correspondence 2049 **Project:** 11759 **Document:** 38106
ID:

Received: Apr,12,2011 12:54:36

Correspondence Web Form

Type:

Correspondence: As much of a dog lover as I am, I strongly believe that our domestic companion animals should never trample on the habitat of wildlife, particularly endangered and threatened wildlife. There are many other places in the area where we can walk our dogs off-leash. I strongly support the preferred alternative and the restriction of off-leash areas in the GGNRA. Thank you for your service.

Correspondence 2050 **Project:** 11759 **Document:** 38106
ID:

Received: Apr,12,2011 00:00:00

Correspondence Other

Type:

Correspondence: Comments San Francisco

Former City gardener (14 years) says City should take back Fort Funston. I never had trouble with my sheltie - plants, birds, etc. even though he was off leash. Go after the trouble-makers and punish them. "Don't use a cannon on

a gnat."

Walking down the cliffs to the beach with a dog on leash would be dangerous to people.

How about parallel paths or dog paths & people paths -Build a new path for dogs)

I'd like to keep Ft. Funston as a recreation area with historic use, as legislation intended it to be.

I live on Great Hwy. + would like to at a minimum have NO ACTION.

Why do you have to punish the dogs + dog owners/walkers? The vast majority of dogs at these parks are under control and do not destroy the environment. Visitors already have plenty of places to visit where dogs aren't allowed. Can you just leave the dogs the little off-leash areas that they have left? If not properly exercised they become destructive : (

Correspondence ID: 2051 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 12:55:24

Correspondence Type: Web Form

Correspondence: I like dogs, but as a parent of a young child in San Francisco I'm tired of not having anywhere to go and enjoy parks and beaches without a dog terrifying my child, stepping in feces, or having dogs pee all over our sand castles (happened 5 times in 15 minutes last week on east beach in crissy field). The message our children are getting is that dogs are more important than children, and that is unhealthy. Our local park (ESprit) is unusable by anyone by dogs, and that is unhealthy. I support a compromise that allows people and families (and poeple with allergies) to have certain areas off-limits to dogs and many more off-limits to off-leash dogs. My daughter just turned four and has been knocked down or chased in scary ways by untrained off-leash dogs a half dozen times.

Just because they are more vocal doesn't mean they carry the majority sentiment. If that were the case we would all be Tea-Partiers, wouldn't we?

Thank you!

Correspondence ID: 2052 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

-Walking on Beach is a recreational activity -- with the dog it's an aerobic activity - healthy person = healthy dog = healthy community

-Crissy Field needs better fence repair and signage to keep restricted areas clearly marked!

-We are told we don't own our dogs we are their guardians! We are told that they need exercise but now were told there is no place for them to safely run without dangers of cars! Thanks for the catch 22, GGNRA

Correspondence ID: 2053 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: San Francisco

I have been walking @ Ft. Funston & Ocean Beach for over 10 yrs. and have never seen a bank swallow or a snowy plover and I have been looking! My dog has certainly never disturbed those birds. I'd love to see them

After a lot of consideration we got a dog. Why? Because San Francisco is dog friendly. Because we live in the city & can go to the beach off leash. Our dog is 7. What do we do with her, now that we have her, if the off leash areas go away? If any changes occur, they should not be implemented for 15 yrs. (average dog life span) so that those of us who bought dogs under the current circumstances can let our urban dogs run.

Ocean Beach comments: re protecting snowy plovers: what keeps feral cats from colonizing near important ground-nesting habitat? Could dogs off-leash help discourage feral cat colonization? The issues for protecting snowy plovers must include the impact of dog management on unintended consequences, such as a potential rise in feral cat colonies. Recommend baseline studies now so future management is evidence-based.

Ft. Funston - what is being protected by closing paths to off leash?

How many of our tax dollars is being used since the 1970's to regulate these areas + get rid of off leash dog walking? Couldn't they be put to a better use?

Will you provide an accounting of the money spent???

Correspondence 2054 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,12,2011 13:17:57

Correspondence Web Form

Type:

Correspondence: I thoroughly enjoy walking my dog at Crissy Field, Ocean Beach, and Fort Funston. There is so little of GGNRA land devoted to dogs for off-leash walking, that this proposal is too restrictive. It seems like only 1% of GGNRA land is for off-leash walking. I am a 37 year lesbian with a 9 year old dog. My dog, Pele, who is 70 lb. lab mix has arthritis. What I love about these 3 places is the accessibility. I can drive up to the parking lot at any of the three locations I listed above to walk her, she can go swimming, and run through the meadows. Because of her arthritis, my dog cannot walk so many miles to enjoy GGNRA public land. Whereas people can drive and hike much farther than my dog to access 99% of hiking trails belonging to GGNRA in San Francisco and San Mateo counties.

I suffer from anxiety and depression and I am a graduate student studying Counseling specifically Gerontology at SFSU. I cannot afford to join a gym. I don't have kids. My dog is like my son and at the same time a dependable partner who offers me unconditional positive regard. She helps me with my depression issues and I offer her exercise and happiness in return.

She loves to swim more than anything in the world and grassy meadows at Crissy Field which is like dog heaven. She is a happy dog, well-socialized, and friendly to people and other dogs because of all three of these locations.

Fort Funston is like Disneyland for dogs. She can go swimming, wander around the dunes and I don't have to worry there will be scraps of food (like there are in gritty city parks) for her eat unless I watch her like a hawk. If she eats food scraps she finds on the ground, she will get diarrhea and throw up for days. She has a sensitive stomach, but loves to eat food scraps because she is a hunting dog by nature. Fort Funston is like her backyard. It is big enough for us to go on a 30 minute walk, run or hike.

I live 3 blocks from Ocean Beach and I can tell you the severe restrictions are not needed to protect the snowy plover. My dog does not chase birds. She chases balls and frisbees. I have seen so many joggers run right up to the plovers and then the plovers fly away, yet there is no attempt to restrict their access in the plover areas.

In the near future, 1 in 5 people in this country will be over 65 years old. Old people need touch. Studies show nursing home residents who received visits from pets were less depressed, anxious, and confused than those with no pets. (Pipher, M. Another Country, p.254).

Please don't not go through with these restrictions. It will not be good for the

mental health of many people.

Correspondence ID: 2055 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 13:23:37

Correspondence Type: Web Form

Correspondence: I really appreciate that your concern is the environment-not the dogs! Seems like most dog owners do not appreciate it, as you can tell by their outcry! There are plenty of parks in SF and lots of sidewalks of which ALOT of dog owners take full advantage of-inc, NOT cleaning up after them!! After managing apt. buildings for years, I can see just how much respect dog owners have for the public. I constantly have to clean up their messes and I'm sure the same is true in the parks. The parks are supposed to be for plants and native animals-first-and people and dogs second. If dogs and their owners show such little respect for the city sidewalks, I'm sure that they feel even less in the parks. PLEASE do NOT let them ruin what few natural areas we have left. The city could appease them, if they really wanted to, by setting off leash dog areas in its' parks. For toooooo long, humans (and their animals) have abused the environment. As caretakers, I feel you need to do whatever is necessary to protect our parks and their resources (plants/animals)from human (and dog)destruction. Being born and raised in the wild in Montana, I know what value they hold. I do NOT think that dogs(or humans!) should be allowed to trample, terrorize or threaten the well being of the precious and few park areas left. PLEASE, please PROTECT our parks!! They were here first!

Correspondence ID: 2056 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

Muir Beach - Keep Alt. A on beaches with greater than 20 people/km and no dogs there is still low shorebird use of the beach. Do add the fence to keep people & dogs out.

This is an all or nothing plan. Why not just dedicate 1/2 the beaches to those scared of dogs and 1/2 the beaches to dog lovers? - or drop this plan all together -

How about considering dogs "free" on beaches before 9 + after 5 or 4:30 - It works in other areas - before 12:00.

Please, no dogs or smoking on our public beaches!

How about limited dogs on beach during summer weekends only?!
Otherwise - let the doggies run free!!

The beaches are for all of us - I choose to walk and enjoy my walks with my McNab/Greyhound Roxy Boots!

No dogs no money "Return to Sender"

Why don't you focus on plastic & cigarettes in park areas instead of attacking the innocent dogs?

Correspondence ID: 2057 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 13:32:18

Correspondence Type: Web Form

Correspondence: I fully support the Nps preferred alternative in this eis. There are plenty of places for dogs, but only a few for rare wildlife. Also, dogs detract from experiences in nature as their owners don't always pick up their waste and when they are off leash, they could be especially disruptive. Park services lands are the prize of the public lands system and the highest priority should be given to preserving wildlife and their habitats and conserving the natural elements that make experiences in the national parks so special for all.

Thank you,

Yinlan Zhang

Correspondence ID: 2058 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am a regular volunteer at the Presidio Park and am concerned about the Dog Management Plan for our National Parks. I strongly believe that all dogs should be on a leash and all times while in our National Parks.

As a volunteer, I help plant native plants in the park. Numerous times I have seen dogs disobey their owners while off-leash. For example: One day- a woman walking her dog off leash near our work site lost control of her dog. The dog ran into the sensitive planting area and began growling and barking at the volunteers. The woman was unable to capture her dog when she called for it. The dog ran away from her and then both she and the dog were trampling through the planting area. This wastes the National Park's money

and time. And several of the volunteers were upset by the dog's erratic behavior.

Not all dog owners are responsible dog owners. I strongly urge the National Park Service to enforce a leash law in our nation's parks.

Thank you.

Correspondence ID: 2059 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: B Comments

Non-listed species of special concern should be identified and explained in the DEIS.

I go to Ocean Beach a lot and everytime I go I see dogs chasing shorebirds. -"People scare shorebirds. Good thing they can fly."

I was bitten by a pitbull when I was 9 and support restricting off-leash areas.

98% of the Nat Rec. lands are no dogs allowed. Leave us 2%. If you hate dogs, go there.

At Fort Funston dogs and people get along well with the prsened distribution of space for both. The dogs need this space to exercise healthily +safely.

Correspondence ID: 2060 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: B Comments

Thanks for the process - will you pay attention to us?

Correspondence ID: 2061 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

-Crissy Field FONSI needs to be reconciled with inconsistent process used

in DEIS for environmental impact analysis.

-Crissy Field FONSI promises that no derivation from the 1979 policy will be made without a public hearing.

Correspondence ID: 2062 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments

There is a dearth of actual damage data by dogs. You are simply re-defining our parks.

Amen. People seem to do the most damage.

ROLA- needs to be defined in Exec. Summary.

Too many dogs in a small area leads to more, not less, destruction + conflict.

Park contractors bringing their dogs to work - For Baker - Cavallo Lodge

Correspondence ID: 2063 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 13:49:05
Correspondence Type: Web Form
Correspondence: I support a leash law for the GGNRA.

I frequent the parks of the GGNRA with my 7 year old son. Numerous times we have been confronted by off-leash dogs while enjoying the park. It is not comforting for a dog owner to say, "she won't bite" or "he's harmless" because even the most well behaved dogs can be unpredictable. I want to enjoy my time in the park, not worry about dogs.

The National Parks are for all to enjoy and are not for dogs to run free. There are dog parks or other open areas for dogs. The National Parks are delicate lands that we should protect. The human impact is already causing enough damage to these natural areas. We don't need off-leash dogs tramping through protected lands.

Please keep dogs on leashes in our parks!

Correspondence ID: 2064 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00
Correspondence Other
Type:
Correspondence: Comments

If an area needs to be protected, fences could be actual fences that would keep dogs out of areas instead of the current low cable line they hop over without knowing they should not go there.

-How about working w/dog walkers & allowing them to form a coalition/committee w/ the NPS to oversee & regulate other dog owners & park users... -educational out reach by monthly volunteer open houses - better signage regarding park etiquette -volunteer monthly walk/foot patrol to enforce new off leash rules.

-Annual permit fee for all dog owners to use SF GGNRA lands \$50 a year x 150,000 dogs =7.5 million annually (similar to a fishing license) -Annual permit fee for commercial dog walkers

-What % of total GGNRA is now rola? What % is recommended by new proposal?

-Reducing the area dogs are allowed off-leash would likely result in highly impacted and overfilled areas where dogs would be allowed. There would likely be more incidents (dog-related) and the negative impact on that land would be exponentially worse.

-The # of dogs in the bay area (who utilize GGNRA land) will not change - overcrowding will become a problem not only in GGNRA parks, but also parks in the surrounding cities.

Correspondence ID: 2065 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 13:57:25
Correspondence Web Form
Type:

Correspondence: It seems like the plan doesn't really consider current public use for specific parks, but rather an overall desire to restrict/ban dogs in the name of wildlife conservation. Furthermore, there doesn't appear to be any scientific evidence that dogs are directly affecting the wildlife population. If it's the mere presence of dogs that disturbs the habitat then I would think that people and horses being there would cause the same disruption, but there has been no effort to try that approach. I visit the Fort Funston every week, I find that it contributes to the health and well being of dogs, as well as creates a sense of community in this more and more isolative society we live in. Dog owners are respectful and clean up after their dogs. Our visits to Fort Funston are

personally helpful because my dog is so happy when he runs on the beach and there really isn't a space where he can just have that opportunity outside of the park. Bc of the density of the neighborhood that I live in, it's difficult to do anything with the dog beyond leash walking. Finally, it is great exercise in a beautiful place, something the government should be promoting more of, instead of restricting access to. Please assess each park separately, and consider the limited open space we have in San Francisco to play and be in nature. Respectfully, Kat Ongbongan

Correspondence ID: 2066 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Park Form
Correspondence: As a dog bite victim, I support the preferred alternative.

I support having dog-free areas of the park - like 100% of other national parks. I support the compliance mechanisms in the draft and want to see more enforcement (fines) for existing and future regulations.

Compliance mec. - worst part of plan. Once dog areas are agreed don't change w/o futher consultation. Current "downgrade only" plan is unfair and at whimsy of NPS.

Correspondence ID: 2067 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: At Ft. Funston the Alternative plan would crowd dogs so much as to create tension and unruly behavior. It is the open space for people and dogs that allows for safe and enjoyable intermingling. Dogs need space.

Correspondence ID: 2068 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Letter
Correspondence: Comments San Mateo

Golden Gate Nat'l Recreation Area is: an urban park in a city where dogs out number kids! And it is mandated that it be available for the use of people & families (including families like mine that include dogs!)

Dogs don't leave trash. People do. Dogwalkers pick up trash & poop from other people's dogs. -"That is not my experience. Dog poop everywhere." -

"Nor Mine"

GGNRA land should be preserved as habitat for native species.

Dogs have been scapegoated for human slopiness.

Humans are also native species.

Correspondence ID: 2069 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments for New Lands

Default position regarding new park land should be the same as it is for 100% of national parks in the U.S. - no new dog areas.

We need parks for use, not museums. If the enviros don't want land used, they can buy it and take control themselves. Public land should be for the PUBLIC.

(1) Dog owners VOTE - in high number (2) There are more dogs than kids in SF- by far -and how many migrating birds? (3) Public rec areas should serve VOTERS/taxpayers (4) Dogs have plenty of alternatives - shorebirds don't.

This land was intended for the primary "use + enjoyment" for S.F. citizens and has always been dog + people friendly! Habitat etc is 2nd to people + the people of S.F. are dog friendly

Correspondence ID: 2070 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 00:00:00
Correspondence Type: Other
Correspondence: San Francisco

-Suggest an off-leash loop that includes the Sunset Trail through Batt Davis, then south back to the currently proposed ROLA near the parking lot. Loops are always preferred as a dog walking route. -"Good suggestion"

-NPS needs to repair existing fences - put energy into upgrading the fences.

-Dogs are more sociable when off leash -"Soooo true"

Correspondence ID: 2071 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: San Francisco

-Middle aged women often have shoulder problems that make it hard to walk dogs on leash.

-NPS has not presented data on the number of dogs that use Ft. Funston

-Fort Funston is safer than Ocean Beach; doesn't have the juvenile delinquents or homeless. This makes Ft. Funston feel like a safe area.

-If you close Funston to those who currently use it, who will come?

-Offended at the amount of \$\$ spent on this plan when there are so many other problems.

Correspondence ID: 2072 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: San Francisco

Crissy Marsh is dead- need more water flow + plant life to encourage bird life - this is not a dog issue. If want more shorebirds need more decaying vegetation.

Why not convert Funston Horse trail to a ROLA? Majorit of Funston visitor walk dogs - they do not ride horses!

Why don't you protect the existing 12-acre wilderness area instead of taking away the other areas - which has NO federally endangered or threatened species?

Correspondence ID: 2073 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Other

Correspondence: San Francisco

Fort Funston is a prime gem of a location in SF that should be able to be

enjoyed by people who don't like/are afraid of dogs. The current plan has the prime beach front as off leash - reduce or move the off leash to different location.

Ft. Funston is cold, fogg, & windy. I don't believe it would be utilized by many people other than dogs & their owners. I've been going there since the '60s to walk my dog. I've met many older people who walk there because they feel safe with all the dogs & their owners. I do agree that limits on the # of dogs one person is walking is a good idea, however, to restrict the areas available for off-leash walks so drastically will only increase the possibility of dogs fighting & will greatly impact the parks within SF. This is an urban national park & there will always be a lot of dogs in SF. I don't want to feel like a criminal for letting my dog run & play.

Correspondence ID: 2074 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 15:20:31

Correspondence Type: Web Form

Type:

Correspondence: I strongly support the dog plan. I have nothing against dogs, and I feel that they should have the opportunity to get unfettered exercise, but not at the expense of the rest of the world. At Crissy Field, even leashed dogs can be a major nuisance, or rather their owners can, when the owner walks down one side the walkway and his or her leashed pet prowls the other side. The limitations you plan to place on free running dogs are very reasonable, and only a dog nut can object to them Unhappily, we have a myriad of dog nuts in this city. Please, don't let yourselves be governed by a hysterical minority.

Correspondence ID: 2075 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 16:03:19

Correspondence Type: Web Form

Type:

Correspondence: I understand peoples' desire to let their dogs exercise off-leash, but this is a safety issue. Both of my dogs have been attacked by dogs that their owners claimed were "harmless" in dog parks and I no longer go to places where dogs are allowed off-leash because the don't feel safe. These parks are meant for people to enjoy and they should be able to do so without feeling threatened.

Correspondence ID: 2076 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 16:12:44

Correspondence Type: Web Form

Type:

Correspondence: I endorse Alternative D, the most protective option identified in the process.

I respect the pragmatic compromises that are being suggested by the GGNRA in their preferred option recommendations, but I know that I, and many people that I know (not to mention the multitude of other impacted species, and the generations of the future) would be happiest with the most stringent protection of the remaining natural and public access areas around us.

As a parent of a young child I am frequently upset that the freedom of myself and my child to enjoy the recreation areas is marred by my child's natural fear of unknown dogs that are often larger than he is. Dogs on leash are intimidating enough when their human companions may not be fully attentive to the dogs' reach at all times, and can not stop the growling and barking which is inevitably a part of the nature of many dogs, but dogs off leash are a great concern to me in terms of worrying about my child's safety, and force me to have to regularly actively and defensively manage the distance between us, be on constant watch for approaching dogs, and to insert myself physically between dogs and my child.

I am also an advocate of the protection of natural areas and threatened species. These areas and species should be preserved as best we can: for the generations of the future; to maintain a balance of our environment as best we can; to serve as essential sites and features of education, spiritual and mental health connection with nature; and to be safeguarded as potential genetic and informaiotn for future needs. To the extent that dog access to the areas of the Golden Gate National Recreation Areas threatens and undermines the safety, enjoyment and protection of these important places - as I understand/experience to be significant - I fervently support restrictions which promote continued access of the many species who have these areas as their home, and the safety and enjoyment of the many people who wish to have their appreciation unmarred.

Thank you for your consideration, and I have my fingers crossed the rights and concerns of the rest of us, now and into the future, are not overrun by the selfish, narrow, and vocal interest of people whose love for animals and the rights of others to access public natural areas other ends with themselves and the single species that they choose to keep as companions.

(P.S. I heard about the EIS and the dog management plan from signs at Ocean Beach).

| | | | |
|-----------------------------|----------------------|-----------------------|------------------------|
| Correspondence ID: | 2077 | Project: 11759 | Document: 38106 |
| Received: | Apr,12,2011 16:41:48 | | |
| Correspondence Type: | Web Form | | |

Correspondence: Baker Beach needs to maintain an area for off leash dog walking.

Option A is the most agreeable plan but if dogs must be limited option E would be second choice.

I don't see any difference between options B & C.

Correspondence ID: 2078 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 16:47:20

Correspondence Type: Web Form

Correspondence: I am an environmental documentary filmmaker with extensive outdoor filming experience on public lands in the Bay Area. Although I love dogs, grew up with dogs, and am not anti-dog, I do feel that other species deserve respect and protection as well, especially smaller, more vulnerable species that do not have an enormous human lobby such as dog owners. Endangered species like snowy plovers, endangered plant life, even common plants and animals -- all can be harassed, damaged, and/or destroyed by dogs running wild in our public spaces. As a nature photographer, I've seen this happen too often. Please choose alternatives in each case that provide maximum protection for wildlife and plant life.

Judy Irving Executive Director, Pelican Media

Producer/Director "The Wild Parrots of Telegraph Hill" "Pelican Dreams" (in progress) "Treasures of the Greenbelt" "Secrets of the Bay" "Partners on the Land" "Kids by the Bay" "Heron Island" "San Pablo Baylands"

Correspondence ID: 2079 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am a San Francisco resident and a senior. As an urban dweller, there are few places to adequately walk your dog with out disturbing residents. The few "off leash" areas are about to be done away with with your dog management plan. The inconvenience is not only to the humans bit to the dogs. Have you ever gone to Fort Funston and witnessed the play and freedom of both dogs and humans? I have never seen an inappropriate interaction in all the time I have been walking dogs there. There are a lot of areas where dogs are not allowed and that is okay, as long as there is space for dogs in other areas. If this action is carried out, it will severely impact all other parks and areas. I think we need a balance and a place of all of us. Thank you.

"The Preferred Alternative is not "balanced."The 1979 Pet Policy allowed dogs off-leash on less than 1% of GGNRA land. Given recent additions of large tracts in San Mateo County to the GGNRA, this number is now significantly less than 1%. Off-leash dog walking started from a position of great imbalance. One-third of San Francisco households have dogs, yet they can currently recreate with their dogs on less than 1% of GGNRA land. The Preferred Alternative allows off-leash on even less, including no off-leash anywhere on GGNRA land in San Mateo County. How is that balanced? By denying the possibility of off-leash on any new lands that come into the GGNRA in the future, the Preferred Alternative will ensure there is no balance between recreation and protection of natural resources in the future. We need more off-leash recreational open space, not less."

Correspondence ID: 2080 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 17:20:17
Correspondence Type: Web Form
Correspondence: We highly approve of the Dog Management Plan. Dr. & Mrs. L. Feigenbaum

Correspondence ID: 2081 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 17:55:39
Correspondence Type: Web Form
Correspondence: Please require that dogs be on leashes throughout the GGNRA. Voice control does not work adequately.

Please require that dog owners provide evidence that each dog is licensed and up to date on shots

Please keep dogs out of environmentally sensitive habitat areas and trails.

Please prohibit commercial dog walkers from the GGNRA.

Please provide a mechanism to evaluate the impacts of dogs on the GGNRA and compliance with regulations on a regular basis with the ability to tighten restrictions if necessary.

Please enforce the new rules vigorously.

Thank you.

Correspondence ID: 2082 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 18:36:39
Correspondence Type: Web Form
Correspondence: I support Alternative D; the most protective plan. I have been in many GGNRA areas and have been boethered by unleashed and out of control dogs. I know also that they are bad for wildlife.

Correspondence ID: 2083 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 18:46:00

Correspondence Type: Web Form

Correspondence: I live in downtown San Francisco in a condo w/ my partner & a rat terrier named Felix. It's not easy for a little dog w/ lots of energy in an urban city. We don't have a back yard to let him run around. Sometimes I let him run down the hallway just to release some of that energy. I live 2 blocks from Huntington Park & try to take him there so that he can sniff & scratch in the grass but I can't let him off the leash. That's what's great about places like Fort Funston & Crissy Field. He can run freely & he's so happy. Please don't take that away from us. Besides it's great exercise for us too.

Correspondence ID: 2084 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 18:50:12

Correspondence Type: Web Form

Correspondence: I strongly support the NPS preferred alternative for all park areas with regard to the dog leash law.

Correspondence ID: 2085 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 20:47:51

Correspondence Type: Web Form

Correspondence: Dogs exist. They are a fact and a part of society. Until dogs are outlawed, they need to be taken care of. In a large city such as this, some dogs only alternatives to exercise and socialization is the public parks and spaces. If you minimize these, our dog friends will suffer. My dog is cleaner, more polite and quieter than most children, yet she is penalized because she has four legs. I am a long time visitor of public dog spaces, and I can say that 99% of dog owners are responsible, law abiding citizens where their dogs are concerned. Please don't penalize the dogs who have no voice! Save San Francisco's off leash areas! Thank you.

Correspondence ID: 2086 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 20:47:53

Correspondence Web Form

Type:

Correspondence: A trained dog (a dog that actually obeys) or a dog on a leash, is not much of a problem. I have a 3 year old daughter and I can not tell you how many times a strangers' "friendly" dog has knocked her down in their excitedness to jump on her and be friendly. She has been scared and hurt, and the owners think it is OK because their dog meant no harm (even though they caused harm/fear).

Imagine a 40 or 60 pound dog running towards you . . . or you and your 2 year old or 3 year old, and you hope it is friendly, but it is impossible to know the dog's history or intentions, right?

And then I know people who have told me their dog is trained, yet it does not obey them, so I wonder how loosely the word trained is interpreted by many dog owners.

Correspondence ID: 2087 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,12,2011 22:07:57

Correspondence Web Form

Type:

Correspondence: I urge you to require all dogs on Ocean Beach be kept on leash at all times. Voice control has proven not to be effective.

I have run and walked on Ocean Beach for over 40 years. In recent years there have been an increased number of unleashed dogs on the beach. I have been bitten by an unleashed dog while running on Ocean Beach. When running with friends who have a dog on leash, their dogs have been attacked by unleashed dogs. Each of these behaviors is natural of dogs. By their very nature and breeding, they attack running prey, in this case me. A leashed dog appears to be in a weakened position and is fair game for an unrestrained dog.

Often the owners of unleashed dogs are hostile when I ask them to control their dog. When I ask them to restrain their dog, they are often openly hostile. I have been called crazy, cursed at, and given the "finger".

I should not have to take a subservient position to dogs. They should all be required to be on leash, not just voice control, while on Ocean Beach

Correspondence ID: 2088 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,12,2011 22:20:17

Correspondence Web Form

Type:

Correspondence: I am a runner and cyclist who uses the Crissy Field promenade, East Beach, and Fort Mason areas several times per week. I have had several "near miss" encounters with both aggressive dogs and small yappy dogs off leash running at me, darting in front of me, and otherwise coming very close to injuring me both at Fort Mason and Crissy Field.

I also frequently launch my kayak off of East Beach, and have had negative and frightening labrador encounters. One time, a large dog swam up to my boat near shore and nearly capsized me, as the owner seemed unconcerned. I also regularly collect 3-4 gross abandoned dog-chewed tennis balls from the water when i'm out off east beach. This is yet another negative environmental impact that dogs are having. I 100% believe that the current situation is unsafe and inappropriate, and i fully support the Park Service's proposal to bring dogs under better management, while still allowing some areas for off-leash use.

Correspondence ID: 2089 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 22:51:13

Correspondence Type: Web Form

Correspondence: Thank you very much for allowing the public to comment. I know how hard you all have worked to navigate a comprise and to weaving a way that allows very diverse groups to enjoy the all the beauty and splendor that is the GGNRA.

I strongly encourage you to restrict the access of dogs. I want to share a couple of stories that I hope will help you articulate why these measures are important.

I am a 50 year old 5'4" woman. One day a year or so ago, my husband and I were walking along Chrissy Field enjoying the sunshine. As we walked along, we came upon a 6' tall late 20 something male making like a litter box cat, flicking the beach sand with his shoe over his dog's warm turd. As my husband kept on walking, pretending not to know me, I went into Mom Mode and proceeded to discipline Mr. 20 Something Dog Turd Man. The crowd backed away and Mr. 20 Something Dog Turd Man stood stoically while I turned into a peri-menipausal maniac hell bent on publicly humiliating him. Fortunately, concealed weapons are not part of the culture for San Francisco-- he let me live--and I suspect that I humiliated him enough that he will forever carry a doggy bag. My point in telling this story is that there will always be a Mr. 20 Something Dog Turd Man, there may not always be 50 Something Peri-menipausal Maniac there to discipline him. More stringent rules restricting the access to dog owners need to be put

in place.

Another story did not occur in a GGNRA but it highlights a common problem. One day, as I rode my bike down the paved bike path I encountered a couple with a young pup. Thinking that they were doing their young dog a favor, they allowed the dog off the leash. He scampered to and fro and, in the process, the poor little thing dashed directly across my path. I slammed on my brakes, crashed to the ground, and injured my shoulder. Sadly, the owners, through their negligence, allowed the little 10-20 lb pup to be transformed into a speed bump for a 130 lb woman. If the poor little thing been on a leash, the owners could have ensured he stayed out of the path of my bike and both of us would have been able to enjoy the sun. Sometimes strict rules need to be enacted to protect the pets we love.

Sincerely, Kathy Schaefer

Correspondence ID: 2090 **Project:** 11759 **Document:** 38106
Received: Apr,12,2011 23:15:09
Correspondence Type: Web Form
Correspondence: I agree wholeheartedly with the position of Golden Gate Audubon Society:
1. Off-leash areas should be fenced or well-marked to provide a clear boundary for off-leash activities. If installing a fence in an area would have an undue biological or aesthetic impact, then there should not be an off-leash area in that location. 2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance or should initiate measures to improve compliance. If one quarter noncompliance is tolerated, it will engender further noncompliance (noncompliance breeds more noncompliance). 3. Commercial dog-walking should not be permitted in the GGNRA. The Park Service is supposed to allow only commercial activities in the parks that further park visitors' experiences. Commercial dog walking does not enhance any person's experience of the parks. 4. At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs. 5. While they are important parts of our families and communities, dogs are just one species that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.

Correspondence ID: 2091 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 23:33:50

Correspondence Web Form

Type:

Correspondence: I have always been a dog lover. I volunteered for a while as a dog walker at the San Francisco SPCA so that I could be close to dogs.

However, I am also a bird spotter and enjoy seeing the many beautiful and unfortunately sometimes threatened species. These wild animals need secure places where they can feed and breed unmolested or they may not survive. Dogs are not threatened and live in comfort and security with humans. We need to keep wild areas that are free from domestic animals so that the birds may thrive and not be harassed.

Most of the GGNRA should be off limits to dogs, even supposedly leashed ones. I often visit Heron's Head Park where there are many very visible signs requesting that dogs be kept on leashes, yet every time I go there I see dogs running free, sometimes in the direction of nesting birds. Many dog owners are respectful of the ordinances about leash requirements, but many are not. Let there be areas in the GGNRA where leashed dogs are allowed, fenced areas where they may run free, but please keep most of the GGNRA free of pets.

Correspondence ID: 2092 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,12,2011 23:48:53

Correspondence Web Form

Type:

Correspondence: I am in full agreement with the policies outlined in the draft environmental statement. Dogs need to be on-leash everywhere in National Park areas, if allowed at all. I have seen over the years substantial degradation by dogs running off-leash and out of sight of owners on many trails in the GGNRA, not to mention the nuisance to other users of these trails who are being molested or threatened by dogs running out of control. Fort Funston is a depressing sight since dogs were allowed to free there. I hardly go there any more because the land has been so devastated. The same goes for Ocean Beach.

The preservation of natural features and wild life in the GGNRA should be the overriding principle by which any other uses are being considered. Dogs do have a largely negative impact on these, and therefore their access needs to be strictly regulated.

Considering the fact that most dog owners I have met on trails are rudely disregarding the need to keep their dogs under control, and the park does not seem to have the resources to enforce adherence to their regulations on the trails, it is absolutely necessary to keep dogs out of all sensitive areas, and

where they are allowed, they need to be kept on a leash at all times. This is the only sensible solution.

Correspondence ID: 2093 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 01:25:24
Correspondence Type: Web Form
Correspondence: Off leash recreation for dogs is critical at Fort Funston and elsewhere.

These are URBAN parks that are being administered by the National Park Service. Instead of trying to repeatedly overstep your mandate and ban dogs every few years, spend the money on trail and fencing improvements to keep dogs on the trails more effectively.

Thanks, David

Correspondence ID: 2094 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The San Francisco city supervisors have made it clear that they will not enforce the leash laws in San Francisco. They do recognize that dogs are off leash everywhere but again intend to do nothing. This means off leash dogs will continue to be in on leash city parks and on the city streets. There is an off leash problem in city parks that has already made it so that I do not go to a single city park. I also have not been able to enjoy the ggnra due to the off leash dogs. I have hope that space in San Francisco and the greater bay area will be created by setting leash laws and dog free areas that will enforced by the ggnra. While the ggnra is not a lot of space compared to the rest of the bay area, I would be happy to have this little space to enjoy.

Correspondence ID: 2095 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Here is video evidence of the damage dogs are doing in the ggnra and also the lack of respect dog owners tend to have for the law, other people and nature. http://www.youtube.com/watch?v=y0o_zv9MDQw
<http://www.youtube.com/watch?v=LfIp7SF9W9Y>

Dogs also do the same thing in city parks. While you can't do anything about city parks, please do something about dogs in the ggnra. Here are some videos of dogs in san francisco city parks:

<http://www.youtube.com/watch?v=5IFV7f1ja5k>
<http://www.youtube.com/user/TVman1981#p/u/187/1d6j3zMq70U>

I also agree with this video that professional dog walkers are a problem. We need to have tighter regulations on professional dog walkers. They should be limited to three and professional dog walkers should always have to have the dogs on leash. <http://www.youtube.com/watch?v=oc-DJmjR8S0>

I suggest that dogs be on leash everywhere that dogs are allowed. I also suggest heavy fines for breaking the law.

Correspondence ID: 2096 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: San Francisco

(1) Dog "Poops" in compostable bags

(2) Dispose in containers which will convert to methane = energy for power - i.e. -light posts, etc. (as done in dog park in Boston!) *See Internet*

Having one of the off-leash areas RIGHT NEXT to the parking lot is dangerous! We need appropriate and safe areas to let our dogs off-leash.

To protect threatened plants & animals, please provide an effective barrier! Current fencing is inadequate and ineffective.

Correspondence ID: 2097 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Crows are a bigger problem than dogs - non native: need my dogs to protect me from crows.

-If pollution from dog poop is an issue, what about residue hydrolic fluid from the Nike era. NPS doesn't even know where this waste is.

-NPS is taking away the most important thing in my life.

-This is not an area for children and never will be.

-Where will people with disabilities go? Plan hasn't accounted for people

w/disabilities

Correspondence ID: 2098 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: San Francisco

The proposed plan crosses a line that will bring action. 2% is all dog owners have. There will be negative action (i.e. violation of leash-regulation in all areas) and positive actions (i.e. lawsuits to challenge the entire authority of the GGRA) that no one wants to pay for

Correspondence ID: 2099 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: San Francisco

Funston

Consider limiting/confining dog walkers with more than 3 dogs to the non-paved areas rather than banning or charging them. That would leave the paved areas for people who are afraid of dogs, have small children, etc.

Please don't scapegoat the dogs.

Sand ladder access, and other access , for disabled people with dogs is not adequate.

Don't ban dogs from the horse trail at Fort Funston (or other areas) - but rather have rules to leash dogs when encountering horses (other users)

Correspondence ID: 2100 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: San Francisco

There is no way to get down to the beach @ Fort Funston unless a person can handl their anxious dog(s) (heading to the beach!) on leash down hill in sand or stairs - NOT ALL PEOPLE CAN DO THIS - old folks, disabled,

etc.

-More education/information w/clear signage for the public

-Restricting walking = to ignoring the environment, why? Because people (dog walkers) pick up tras at the beach....

Create more accessible ways to get to beach/shoreline. Hard-packed pathway for wheelchairs, etc etc.

Correspondence ID: 2101 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: San Francisco

Provide public compostable poop bags in Park Areas.

License fees for unlimited/wider access for off leash experience? - w/hardship exceptions for low income dog owners (sliding-scale)

-Enforce present regulations instead of creating new ones!

-Alternative "A" works fine right now, instead focus on enforcing current laws.

-Children chase birds and run the dunes. Why not leash them?

-Parks should be for enjoying and preserving nature. Dogs should not be valued more than wild animals and not more than people. I'd like to enjoy dog free areas of the park.

Correspondence ID: 2102 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: San Francisco

I have witnessed dogs chasing birds and other native species too many times to count. We need to save and preserve our natural resources which have been degraded for years by dogs.

Change Funston beach access to gradual sloping incline. This increases visitor access and minimizes erosive effects.

Correspondence ID: 2103 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Sf 3/5 Comments?

Ft. Fun - if the proposed off-leash area is limited to the sand dunes I am denied access to walking with my dog (I walk, haltingly, with a cane + I do not have good footing).

Q. How many dogs are there on a "no" dog beach? A. Too many!

Why is the dog area in the worst area near car traffic?

This is the most egregious restriction! Perhaps a day/time restriction is in order. Weekday walking here is superb. It is quiet and easy to keep dogs away from wildlife.

The new rock revetment has displaced more bank swallows than ALL dogs running between Sloat & Fort Funston.

Make it clear where NPS jurisdiction ends + other agencies take charge...

Correspondence ID: 2104 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: SF 3/5

The KEY to appropriate CONTROL...is ADEQUATE, Communicative SIGNAGE! Like: "Entering Off-leash dog play area" Like: "Parking fo access to beach dog-play areas" Also: signs do not have to be made to last a century! Change signs to improve message every 5 yrs. Print on composition materials - not metal.

If you are going to enforce leash laws why not just enforce the more narrow laws we have now. Increase fines for not picking up after dog. Enforce walker license laws & restrictions on # of dogs they can take.

Correspondence ID: 2105 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Type:

Correspondence: SF 3/15

I am not comfortable with dogs (bitten twice, once in the GGNRA) and would like to see less off leash areas. In particular, I would like to enjoy the Fort Point area, lands end, and crissy field. At the moment, I feel like I can't go to these areas or really the majority of the GGNRA. Thank you.

Lands End should be closed to dogs and restored to its natural state -as a nesting area for migratory birds. -Same could be said for all of San Francisco! We live in 2011 - Adjustments must be made. Signed: The Adjustment Bureau

My dogs don't go in designated areas for birds

Correspondence ID: 2106 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Type:

Correspondence: SF 3/5

I work hard to train my dog. She is not aggressive (to people or other animals), she is properly trained to follow me on- or off-leash. Please do not punish me or her by taking away our limited recreation areas.

-Off leash access to the disabled access trails is critical to dog owning persons with some key access difficulties, where the individual has a well trained dogs that is necessary for enjoyment of the person on the walks and for safety reasons.

-Please do not limited off leash dog walking area. There is not enough off-leash dog walking area in San Francisco especially, but in all areas of the park.

Correspondence ID: 2107 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Type:

Correspondence: SF 3/5

Why can't we find a solution that allows everyone access to GGNRA lands, including having sufficient off-leash areas that are actually large enough that dogs can actually be exercised? Alternative C @ Ft. Funston is not large

enough ot actually exercise a dog.

The people that go to Ft. Funston every day are a community. For many of us, our whole social network is made up of people we see and know from Ft. Funston. We will lose our community if you restrict off-leash dog walking. I am losing my human friends if you restrict off-leash dog walking. I am crying for myself even more than my dog!

Anything that says dogs "are allowed" (on or off) will mean "dogs allowed however (the owner) pleases" = off-leashes + to do as they please.

"Voice control" is non-existent + very, very, very few owners can master the techniques.

Dog areas where allowed loose + uncontrolled (meaing "off leash") must be clearing defined, no ambiguity, + enforced.

Dogs are not human, children, or wildlife + owners must be held responsible for the impacts (negative) they can cause to all other users + wildlife.

Correspondence ID: 2108 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

Rules + regulations that are already in place should be enforced (as a helpful solution) instead of curtailing use to all- mostly responsible - people. I am a dogwalker + I am for requiring permits, requiring picking up poop & dog behavior management.

Guarantee access for handicapped walkers effective signage- no dogs, no poop etc.

We support the preferred alternative as being well-researched, thorough, and fair.

Timed use would be better than no dog use of the area

Correspondence ID: 2109 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments

Many dog owners use Fort Funston because they are disabled and can walk only on paved paths. The new plan is discriminatory towards the disabled. You need to make sure there is sufficient access for the disabled and their dogs.

Please keep Coastal--> Wolf --> Miwok Loop open in Marin - It's the only long loop for dogs. Make section on-leash if needed to preserve habitat.

Fire roads are already intruding on wild space. Allowing rola is consistent with that.

Correspondence ID: 2110 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: San Mateo Comments

More areas for off-leash walking are needed.

More enforcement of leash laws + protection of sensitive habitat is needed.

Correspondence ID: 2111 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: New Lands Comments (1)

Overall, the presentations are confusing. A better presentation at these 'open houses' would have been helpful. The NPS could have don a better job + the public deserves better than this. A video would have been nice.

The whole DEIS is convaluted and difficult to understand the real impact dogs on the GGGNRA.

Correspondence ID: 2112 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: New Lands: Comments

New lands should be protected from pets unless it can be shown there

would be NO negative impact.

-"Whoever wrote this shouldn't go there b/c human walking has impact"

Correspondence ID: 2113 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Marin

Electronic leashes work

Muir Beach is one of the few places, humans, dogs, environment cohabitate. The beach has become more enjoyable bc of dog owners and the work they have done.

Correspondence ID: 2114 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Marin

Protect the natural environment by building a structure on it? (Fence on Oakwood Trail))

I spread my dogs ashes @ Muir Beach so he could forever run w/ his pals --
> F-you for even thinking about banning this sacred historically dog friendly area to dogs.

Correspondence ID: 2115 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Marin

If you really cared about the environment @ Muir Beach why did you re-create the parking lot 10"ft from the salmon run? Why are the trash-cans ALWAYS over-flowing, why aren't the signs posted in more than one language...why don't you just ban people and see how that goes over?

Correspondence ID: 2116 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00

Correspondence Type: Other
Correspondence: Marin Comments

Need better signage in Sausalito trail entrances.

Oakwood Trail - Muir Beach have always been dog-friendly - now you want to restrict access or deny access to areas we have taken our dogs to for 40+ years.

I walk my dogs on Oakwood Trail daily. Most of the people on this trail have dogs and most unleashed. There are very few no leash trails, pls do not take this away from all of us responsible dog owners. Dogs need off leash exercise and so do their owners!

Correspondence ID: 2117 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Marin Comments

Oakwood Valley - Fencing along ROLA will impeded wildlife movement

Old Bunker Fireroad, currently dogs under voice contril should remain dogs under voice control. It is a perfect spot for a morning dog run and there is usually almost no one on the road except for the occasional dogwalker.

Open areas need to be provded for off-leash running - like chasing tennis balls- that many dogs need just to be healthy, stornng and not overweight. At Baker used to be good for that.

As a runner the Marin Headlands preferred alternative is fine.

Documented problems/complaints at Muir Beach are very minimal + do not warrant the drastic changes being considered

Correspondence ID: 2118 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments Marin

Describe the impact on existing wildlife (coyotes, turkeys, rabbits, etc) of the continuous fencing and double-gates proposed for the oakwood valley

trail.

Continuous fencing on Oakwood Valley trail will significantly diminish enjoyment of the natural environment for all users including non-dog accompanied humans and horse back riders using this trail. Huge negative aesthetic impact.

Leave Oakwood Valley as it is- it isn't broken, so don't fix it. We don't need to spend money on this.

Alta Trail (ROLA) 15 dogs is too many Have ROLA from ~50' from trail head (Donahue)

Correspondence ID: 2119 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Marin

Re: dogs - please pick up frisbees + tennis balls

Rodeo Beach - -Off leash 6am-10am Rodeo + S. Rodeo then S. Rodeo no dogs the rest of the day + Rodeo beach on-leash/off-leash split the rest of the day. Absence of people + presence of dog early in the day = heaven. 50 years of visiting Rodeo Beach

Oakwood Valley loop needs to remain the way it is - free for dogs to run off-leash. Very few non-dog people use it. If others don't want to be around dogs & their responsible owners - they can go to the other 99% of National Park land!! "Sorry birders use it as well...need to ober the rules!"

Please include an on- or off-leash loop around Rodeo Lagoon

Rodeo Beach is where my dad served in WWII. This very land is part of everyone's recreation area. NPS has no right to limit dog owners; we have the same rights as every other user group.

Correspondence ID: 2120 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments Marin

-On many trails to Muir Beach, I have only met friendly dogs and have

thoroughly enjoyed their company. If it ain't broke, why fix it?

-We need a LONG WALK for dogs between the ridge (Miwok trail) to Muir and Rodeo Beach for dogs ON LEASH! This gives an outlet for dogs & dog people & takes pressure off existing short walk areas.

-Clear signage as to prohibited areas at Muir Beach, Redwood Creek and the Lagoon. A ticket or two to dog owners and families playing, swimming, and damming the creek!

-Muir Beach is what I refer to as "Beau's Beach" (my dog). This is one small beach that is perfect for dogs to run. The weather at Muir Beach is not typically conducive to folks laying out + enjoying the sun, nor is there a major need for habitat protection, except for the estuary. The proposed "Pacific Way Trail" has not yet been built, won't be for a few years, & doesn't even go to the beach. Dogs need to have a place to run & there are so few beaches where this is allowed. Please don't take Muir Beach away from Beau!

Correspondence ID: 2121 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Marin Comments

MuBe- Better fencing and better signage to protect salmon habitat -Ranger + volunteer monitoring on weekends -garbage can for feces on beach

Oakwood Valley - dogs on compact trails have minimum impact but GGNRA built a compacted trail so minimum impact! Mission blue habitat does not exist on O.V. trail- there is no lupine --> so no dog impact

Walking a dog on leash on the beach is inhumane! My dog would not understand this and would think he was being punished!

Correspondence ID: 2122 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Marin

1% of GGNRA lands are available to off-leash dog walking, yet 60% of the population is obese. Dogs that are not adequately exercised can develop behavior problems - one of the primary reasons people abandon/surrender

dogs at over-crowded shelters. Thus there is more demand for recreation - not less in GGNRA.

Guns are ok in the National Parks, but not dogs? If the NRA wanted gos, I'm sure they'd be free to do what they want...it's politics. How about the styrofoam & plastics that irresponsible picnickers leave? Why target responsible dogs & their owners?

Muir Beach - where we walked our dogs + puppies off leash daily for 4+ years. We were the guardians of the beach - picking up litter + reporting injured animals whenever we saw them. Having dogs allowed only in the parking lot on leash??? Might as well shoot your dog or have it stay home. No sense whatsoever in bringing dogs to a beach PARKING LOT! Crissy Field has always been very amenable.

Correspondence ID: 2123 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Marin

-Please allow our well behaved dogs to continue to enjoy Marin County trails + beaches. We are responsible dog owners!!!!

I see far more private dog owners not picking up dog debris than dogs with walkers. Dog walkers as a whole, understand dog behavior better than private dog owners and tend to have better control over their dogs.

Protect the estuary, leave the beach for dogs, families, and enjoyment!

-Many people do not/can not have children - their pets (dogs) ARE their children. Restricted areas would affect their happiness, emotional health + well-being as well as physical health + social/life experiences!!!

Correspondence ID: 2124 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Marin

I have no prob. w/requiring on-leash on the ft. bridge to Rodeo Beach, but please don't limit off-leash enjoyment of the Beach! It's one of the only places our dogs can romp off-leash. We have dogs who do not do do well in

enclosed spaces. They need the freedom to run.

As environmentalists + dog owners, we do want to protect our resources but do not think dogs are inherently "bad" for the enviro. Beaches appear to be among the best places for dogs to be off leash as they can run and easily be kept tract off of + cleaned up after. Whether "pro" dog or "anti" dog, dogs are a real part of many families in our community and we need to provide space for them to be healthy.

Re: Marin Headlands. For years we have walked our dogs on leash up wolf ridge to hill 88. We love to share these beautiful views and spaces w/our dogs. Please don't limit us to the lower reaches of the headlands. It seems that existing trails are able to accomodate dogs w/o a negative impact on the flora and fauna.

Correspondence ID: 2125 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Tonight, I met a lovely elderly gentleman, his hand was not steady enough, so I write this comment for him. He takes his dog every morning to Muir Beach where he meets his other (elderly) friends for socialization. This is his recreation. His dog + the dogs of his friends provide the motivation to get their exercise, the reason for socializing, safety and company on the walk to the beach.

Correspondence ID: 2126 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Marin

Muir beach has been a haven for dogs + owners forever. It is also the one beach most accessible from south Marin. Leave it as is.

Regulate polution before the dogs. Ppl. in the creek are more harmful to the area. The leash to beach is a good idea - off leash @ the beach.

Why not make Alta Trail off-leash. It seems appropriate.

Alta --> make commercial dog walkers permitted to 6 dogs off-leash. Otherwise the proposed regulation will push this to another area (of the county, etc).

MuBe- Off leash ROLA hours- example: Before 11:00 AM and/or weekends.

-Crazy!! Dogs should be allowed on our beaches!!!

Correspondence ID: 2127 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Marin

Animal behaviorists and Members of the Marin SPCA & the San Francisco SPCA advocate off leash areas for the socialization and exercise of dogs (not to mention their owners). GGNRA provides a place where this can happen fulfilling its mandate to provide recreation to it neighboring urban center.

Correspondence ID: 2128 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Marin

Oakwood Valley - Gate area takes away from the sense of a park. Should remain an area with dogs under voice control.

Homestead Valley - This is a neighborhood trail with hardly any people on it - I live here a run this trail dailey with my dogs - Ridiculous to have a leash law especially when dogs are under voice control. I rarely see anyone else on this trail - at the same time.

Oakwood Valley - alway experience good dog owners + again this is such a wide fire road for 1/2 of it, I believe it should stay open to no leash w/ dogs under voice control.

MuBe - Support Alt. #A- There is NO possibility for uniform enforcement of the no-dog on the beach unless there is a permanent presence of L.E. rangers to fairly close the area.

What is the specific evidence to support a change in Muir Beach from ROLA to alt D? (I'll take my answer on your website please)

Outrageous! No dogs at Muir Beach?

Muir Beach - what will be the unattended consequences of dogs going to Stinson beach from Muir Beach - too many overflow onto Upton beach.

Where is the \$ coming from to enforce these ridiculous rules + regs...our tax \$?

Correspondence ID: 2129 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 08:54:39

Correspondence Type: Web Form

Correspondence: Hello, I am expressing my strong support for restricting dogs, especially off-leash dogs, in the GGNRA. Many of our beautiful parks have been literally overrun by off-leash dogs. I am have seen many instances of wildlife being chased and injured by dogs and as a person who appreciates nature and enjoys bird watching, it is very upsetting and discouraging to go to protected areas and see the signage being ignored.

Thank you for your consideration, Jeanine Strobel

Correspondence ID: 2130 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Bldg 3/2

-Please address how dogs, unleashed or otherwise, are more harmful to our environment than humans or wild animals.

-Why can't people who prefer not to be around dogs go to any of the 99% of the areas that either don't allow dogs or require them on leash?

-Why govern every aspect of our lives.

-Senior + women use dogs for safety while hiking the headlands please consider the safety issue.

Correspondence ID: 2131 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: BG/3/2

-If the park service needs revenue - how about a licensing fee for dog

owners accompanied by a weekend course educating dog owners on what to prevent their dogs from doing. Or ticketing people who have no control/don't carry bags/leashes.

ROLA - RE: 4 month old dog --> it is impossible to properly train a dog for recall. Bad idea.

Is this America? Family camping but the family dog can't go? Why came up with that?

Baker Beach is very quiet during periods of the day. Please put up good signage for off-leash times. Not weekends or holidays of course.

Correspondence ID: 2132 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: BG 3/2 Comments

-Is this what all you park rangers went to school for? To take peoples rights away?

-Bicycles cause more environmental damage than dogs. Where is the plan to move them out of the parks?

Correspondence ID: 2133 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 09:07:23
Correspondence Type: Web Form
Correspondence: I think it is unfair to everyone (except the dog people) to allow dogs everywhere. Since the dogs have taken over Ft. Funston, why not give it to them and not let dogs at Chrissy Field, Ocean Beach, and other places so that people can enjoy the experience and birds and landscape are not destroyed.

The dog people have never tried to comply with simple requests to control thier dogs, pick up after them, and stay out of sensitive habitat areas. I own a dog and it is the least one can do in a PUBLIC place. It is much more than a few bad owners.

I strongly encourage you to improve the plan by implementing the following steps:

1. All "Regulated Off-leash Areas" should be fenced, at least in areas where

fences do not pose risks to wildlife and habitats. Fences provide more security for all park users and create clearer boundaries so that dog owners are aware of how to comply with park rules. 2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance. 3. Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it. 4. At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs. 5. While dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.

Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measures to protect the National Park's valuable resources for everyone and for future generations.

Thank you,

llr

Correspondence ID: 2134 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: BG 3/2 Comments

Dog owners are environmentalists too. With a friend, I remove half a ton of trash from Rodeo Beach every year. Putting half the beach off limits to dogs would deter me from going there - meaning a much more trashy beach! Besides, it's mainly dog owners who visit the south beach in the morning- and it accumulates a lot of trash, too!

Dogs being allowed off-leash are better behaved, socialized, and there are less behavioral problems at home and in public. I don't see any evidence in the DEIS that supports that dogs are more destructive than people to the GGNRA.

The issue shouldn't be dogs, but responsible behavior. Why not restrict

irresponsible picnickers who leave more waste than dogs and their owners?

A "Punishment-Oriented" approach. How many people enjoy the parks with dogs vs. the number who stay away because of dogs?

Correspondence ID: 2135 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: BG 3/2 Comments

Please apply compliance-based management on existing dog rules to give them a fair chance of success before imposing increased restrictions.

Where is the alternative that states "leave as is"? Why isn't that an option? Why have you already picked a 'preferred alternative'-'?

The Rodeo Beach "Alternative" is the most dangerous beach for children - you are forcing families w/dogs to choose a dangerous beach.

Correspondence ID: 2136 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: BG 3/2 Comments

-Don't forget dog owners and their pets need off leash exercise.

-Any Natural Resource Area where the potential for significant impacts from allowing dogs off-leash exists should be excluded from dog use, period. Allowing on-leash dog use in these areas requires constant monitoring to ensure that dogs are not released off-leash. Such oversight and enforcement is unlikely without an increase of ranger patrols which, in the past have been practically non-existent.

As a professional dog walker, I am personally invested in dogs having off leash access to these areas, with smaller groups, and well behaved dogs. There can be a middle ground reached which respects the habitat, visitors and the parks so all can enjoy & cooperate within reasonable guidelines. Walkers with 10-15 dogs should not be permitted in these areas. 6 dogs max, dogs under voice control!

Re: On-leash & dog aggression: dogs off leash are usually far less defensive or aggressive than when on leash, so the visitor experience could be argued

to be just as compromised if not more w/ dogs stuck on leash.

Correspondence ID: 2137 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments BG3/2

How about certain trails being off leash + certain trails - no dogs?

How about times of use for commercial walkers rather than no useage?

I think that dogs are being discriminated against!

Please make clear on maps that trails without color desigation will be closed to dogs completely. This is not transparent due to the way the maps are currently identified. I only by chance discovered that a Alta/Oakwood Valley fire road I currently walk daily with my dog will become inaccessible--even if on leash. Thank you.

Correspondence ID: 2138 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: BG 3/2 Comments

Pick up dog's toys, i.e. frisbies, tennis balls, etc.

Limiting/drastically reducing voice control areas for dogs will make the new off leash areasa incredibly overcrowded & miserable. We can all co-exist. There is no hard evidence of damages to the environment directly from off leash dog recreation - mostly from human use. Bird habitats are more affected by erosion or bulldosers trying to control erosion. Dog owners pay equal taxes & deserve recreation on park lands as well. Keep the voice control as it currently is. Thank you.

Humans - not dogs - create the greatest environmental damage & ecological concern.

The "official presentation" of the "dog problem" is greatly over-stated.

Correspondence ID: 2139 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00

Correspondence Type: Letter
Correspondence: Comments BG 3/2

Were all encumbrances and covenants on land donated/transferred to the Park evaluated prior to the publication of the proposal?

Correspondence ID: 2140 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 09:45:22

Correspondence Type: Web Form

Correspondence: To the National Park Service: If the NPS decides against implementing the proposed restrictions on off-leash dogs, the NPS is essentially turning over the entire GGNRA to off-leash dog enthusiasts. On my twice weekly hikes in Land's End and the Marin Headlands, I see off-leash dogs running ahead of their owners by 20-30 feet, chasing birds, spooking marine mammals from their haul outs, and digging up vegetation. When a dog jumps on me, the owner (when s/he finally comes into view) thinks that calling out "he's friendly" negates the fear of a large dog leaping on me. A senior or guardian of a small child may refuse to return to the hiking trails after experiencing a number of such incidents. Birds seeking to court and nest in the urban oasis of the GGNRA may avoid it entirely after dogs repeatedly spook them out of cover. If the nestlings have fledged, curious dogs will cause the parents to abandon their young. Marine mammals may avoid preferred haul outs if canines continue to molest them. Native vegetation can disappear under the continued assault of dogs' paws. All users of the GGNRA, including other species who make it their home, will end up poorer due to the ignorance of off-leash dog enthusiasts and the refusal of the NPS to insist on proper stewardship of this unique, precious area. As reported in the San Francisco Chronicle, a small woman spoke up at a public meeting on the proposed dog plan, lamenting that her two dogs were so large and strong that she could not control them on a leash. This indicates that her dogs are not trained in obedience; they are certainly not "under voice control". This dog owner should not take her canines anywhere without further training, least of all off leash in the GGNRA. As the NPS arrives at a decision regarding the proposed dog plan, I beg you to consider the needs of seniors, children, hikers, birdwatchers, mountain bikers, equestrians, birds, marine mammals, vegetation, and urban dwellers seeking the peace of the outdoors. Please restrict off-leash dogs in the GGNRA. Sincerely, Wonder Gustafson

Correspondence ID: 2141 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: BG 3/2

Was a study conducted to determine whether the "impact" on the environment would be reduced by allocating a set of hours per day during which dogs would be allowed off-leash or in "restricted areas"?

Correspondence ID: 2142 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Letter

Correspondence: Comments 3/2

Please keep the Oakwood Valley F.R. and Oakwood Valley Trail/Alta Fire Road/loop open to dog walking - off- leash. But use a plan similar to the East Bay Parks which allows dogs off-leash under voice control. Also, consider electronic leashes as an alternative to physical leashes. E-leashes are an excellent control and help train dogs to behave properly off-leash. We have such limited access to off-leash areas in Southern Marin, don't take more away. Please consider adding more off-leash areasa, where appropriate.

Correspondence ID: 2143 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments Common Elements

How will GGNRA enforce or even know how to evaluate if a bitch is in heat? This is beyond the realm of expertise (+ should be) and knowledge of much of the employee base.

An in-heat dog can not be responsible for any more impact than a neutered or spayed dog. Do not incorporate no confuse in-tact or not intact dogs with leash laws!

Correspondence ID: 2144 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments BG 3/2

Measures of impact of these alternatives on specise abundance + diversity should be made on test sites. Published data (ie biology letters - 1977)

document 47% reduction in bird diversity along trails used by dogs.

I want to be able to take my dog on hikes in my neighborhood. Please don't take the trails away from my dog!!!

Visitors can currently visit Mt. Tam trails and other areas for "a non-dog experience" Far few people want a 'non-dog experience' therefore, they should have fewer 'non-dog experience' trail options

Correspondence ID: 2145 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: There's no doubt that dogs are an "impact" to the "wild" environment. However, are they more substantial than people (building, poluting, walking, riding)? The benefits of responsible dog owners enjoying our parks while making sure that others can enjoy them far outweighs the drawbacks. Personally, I enjoyed the Presidio/Chrissy for many years before it became a Natl Park & subject to these new rules. The park was a far wilder & more natural habitat (albeit non-native) than it is today.

Please stop your heavy-handed management of our natural resources & leave room for all responsible dog owners to use the park. If you need money to fund education/enforcement you could consider licensing fees or fines. However, you need to develop reasonable rules (voice control) for dogs. Perhaps some areas need to be reserved for no entry by humans & dogs such as nesting areas, or feeding areas. However, dogs should be allowed to go wherever people can go.

Correspondence ID: 2146 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Comments BG 3/2

-dog ownership and respect for the environment are not mutually exclusive

-dog walkers are not, and should not be considered criminals. Well exercised dogs are better behaved.

-I can't run as fast as my weimeraner

-Has anyone thought to find out more about dogs that are not socialized and the effect it has on families with dogs? Why we mess up & dogs hve to pay

for it. Alternative: create addequet dog parks in every block.

Correspondence ID: 2147 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments BG 3/2

Please be specific + substantive

Marin County has one of the highest adoption rates - For this reason, the shelters are able to rescue many dogs from all over California + even Mexico that would otherwise be euthanised! One of the main reasons that enables this invaluable service to continue is the Bay Area's love + compassion for dogs (animals). Many people are motivated to adopt (save) shelter dogs fro the animal's benefit + quality of life AS WELL AS their own - i.e. outdoor activities, social networking, fresh air on beautiful Marin County trails!! Dog-walking has become an important facet of managing depression, personal isolation + lack of social resources available. Being restricted from having a dog in some areas entirely as well as off-leash enforcement will, undoubtedly, affect that social bond + freedom we feel we must maintain at all costs. It is FAR MORE than a wildlife issue. We need these rights. Focus all this energy on the rainforests that are actually dying + disappearing as a result of human greed. Dog owners and dogs in Marin would suffer a lesser quality of LIFE!!

Correspondence ID: 2148 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments Bkgd 3/2

Having dogs on trails, especially off leash provides a strong social network of responsible owners. This is a necessary part of the social fabric of the entire Bay Area. As a new-comer to SF area, one reason I chose the area is due to dog friendly policys. It has been the best way for me to meet others and to participate in the social fabric of the area. Without these rights + privlages, there will be a decline of the social fabric of the entire Bay Area.

I have a dog to get outside, and to get exercise. I use the parks to enjoy this relationship. If dogs are banned from the parks, I would never use the park, is this what you are after?

The federal government will be funding a large initiative to bring people to

parks. This is a salient point. You are barring a primary population.

Correspondence ID: 2149 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments Bkgd 3/2 Please be specific & substantive

-NPS is taking info specific to one of the 21 areas + applying it to all of the areas. Aggregating + therefore fabricating evidence to support their closures.

-It is important that there be consistency between and amongst all the several agencies on road and trail use policies and standards because of the existence of a network of inter-connected roads + trails that are used by all sorts of users.

-Responsible dog owners spend more time, are more attentive, & are more aware of the riches of our natural resources. Please don't restrict their access because of a small minority of less responsible owners. (There are irresponsible campers, bikers, etc. in even larger numbers).

Correspondence ID: 2150 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other
Correspondence: Comments Please be Specific and substantive! Bkgd 3/2

Crissy Field is located in a metropolitan area, unlike Yosemite, it is an urban park.

Dog owners pay federal taxes, too. Where will we go after you exclude us "dog parks" are nothing more than canine concentration camps, and are inhumane, cruel, & filthy. Dogs need fresh air & recreation, and their owners deserve a place in our federal lands.

-I like to hike in less traveled areas. Having my dog makes me feel safer, especially in an urban area. Please don't ban dogs from all the trails.

Correspondence ID: 2151 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Other

Correspondence: Comments Bkgd 3/2

-Please substantiate claims of detriments of dog use with hard data + the results of monitoring/studies. "I strongly endorse this comment" and "here,here!"

-Concern about actual enforcement on the ground. "This Concern is very pertinent"

-Dogs need open land off-leash areas too! Dog owners pay federal taxes too! These taxes are being used to exclude a major user group.

At Crissy Field I strongly recommend 'time of use' - hardly anyone is there from say 10-12 am 2-4pm. Obviously, not weekends & holidays.

Correspondence ID: 2152 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Type:

Correspondence: Comments Bkgd 3/2

You (NPS) can manage bad dog behaviour without kicking all dogs (and owners) out of federal park land. Why punish all for the actions of a few?

-The NPS needs to recognize that the dog owning community is a major user group and work to seek out and expand opportunities for such use rather than restrict them. This should be an ongoing purpose of the NPS. There is a perception that the NPS does not view this user group as important or significant.

Unintended consequences: dog shelters without exercise misbehaving dogs + owners Casar Millan say the most important thing for a dog is exercise. A lot of dogs can not be properly exercised on a leash.

Correspondence ID: 2153 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Type:

Correspondence: Comments Bkgd 3/2

...Conversely, visitors to Marin County enjoy our beautiful trails with their dogs. Marin County is known for its dog-friendly trails. Far fewer visitors will help our community thrive, if they can not bring their dogs when they

vacation.

Look to Upton (County mngd) beach as possible model. Dog side/no dogs. Seems like we need to open more trails for dogs not less, I only hike where I can go with my dog. Don't exclude me!

Correspondence ID: 2154 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Other

Correspondence: Commetns Bkgd 3/2

Hikers are the #1 users of the trails. Dogs provide safety to women + children on the trails. Please address the safety hazards + negative environmental + displacement of users due to bike use of trails before you go after "Mans best friend"!

Correspondence ID: 2155 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 10:57:17

Correspondence Type: Web Form

Correspondence: I like dogs, but do not want them roaming free in the National Parks. All dogs should be on a leash at all times while in the park! I've been approached by off-leash dogs numerous times in the park and have been growled at and barked at. It's not fair that I should be afraid of someone's pet while I'm enjoying a National Park. There are plenty of Dog Parks here in San Francisco - let's not turn our National Parks into National Dog Parks.

Correspondence ID: 2156 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 10:58:44

Correspondence Type: Web Form

Correspondence: I think that the City of San Francisco maintains a number of places that cater to dogs, but precious, precious few that protect native plants and animals. Really the National Park Service is the only organization in the City with the resources, expertise, and express mission to even consider ecology in its work. Much of the City's parks are more or less big lawns with little or no native ecology of which to speak.

Dog owners, in general, have no idea what areas in the park are ecologically sensitive (even when signs are posted, these are either overlooked or ignored). Dog owners, by and large, stay on trail like they should, but when dog owners see an open space, they let their dogs run through it. I've seen

dogs tear through sensitive plant communities (with federally listed native plants!) -- they're covered in weed seeds, they chase wild life, and they poop all over the place. It's a joke to say they're under voice command, especially considering that the owners are mostly clueless and have no idea that what the dogs are doing is ecologically devastating.

One of my buddies told me that he asked a dog owner the other day to leash his dog because it was chasing after and harassing a Great Blue Heron (a huge bird --- 65+ inch wingspan -- that hunts by standing still for long periods of time), and the dog owner refused, saying: "It's natural. Birds get chased. It's natural." This is not an uncommon scene. Without a clear policy that states that dogs in the park must be leashed, there is nothing to stop irresponsible dog walkers from disturbing wild life.

Dog owners do not understand that their domesticated animal is not a part of the local ecology, any more than a pig or a cow would be, and their dog is, in fact, a particularly disruptive kind of visitor to the landscape.

Correspondence ID: 2157 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 11:04:40
Correspondence Type: Web Form
Correspondence: I support the proposed plan, as documented, to balance off-leash dog walking with protection of native flora and fauna.

Correspondence ID: 2158 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 11:08:41
Correspondence Type: Web Form
Correspondence: I know many areas are included in this plan, but I will speak specifically about Fort Funston, since that is the space I am most familiar with and can envision in this battle for off leash rules for dogs.

I understand that many species use this area as their habitat. But dogs are not the only culprits here. Climate, other creatures and humans also take their toll on these sanctuaries. Even if dogs are restricted to leash laws, these areas will not be left undisturbed. So now you will still have species that have a hard time surviving in the environment AND unexercised dogs. A dog that hasn't been properly allowed to run free is a frustrated nuisance. Is that what we want?

What about the humans need to connect with nature? You take away that stroll with your "best friend" and now we've gone against what Teddy Roosevelt said about keeping open space "as a beautiful natural

playground...for all those who have the love of adventure." Is the intent to keep our open space empty of humans too?

I know at Funston some of these areas have been loosely fenced off. It doesn't keep everydog out of there, but rarely do I see a violation. Please keep Funston as an area free for dogs to run. The number of places for dogs to release energy has already been confined too much. Dogs deserve protection too. Don't forget if dogs were not domesticated that these open spaces would be their natural habitat and it is not fair to take that away from them!

Correspondence ID: 2159 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 11:14:21
Correspondence Type: Web Form
Correspondence: I feel the document you have proposed is too stringent. I submit that it is wise to protect the snowy plover where it is found, but to have leash laws in areas that once allowed dogs off leash is unnecessary. Jeanne Emmons

Correspondence ID: 2160 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 11:28:16
Correspondence Type: Web Form
Correspondence: I'm a long-time San Francisco resident and I cherish the GGNRA. It's critical in a city to balance the use of public lands for citizens and for protection of our wildlife. As a frequent walker on Ocean Beach, I'm dismayed to see the number of off-leash dogs every time I walk in the Plover Protection area. Although it's quite well-signed there, I've never seen any citation or consequences for dog owners who ignore the regulations. If dog owners complied with the regulations or if there was active enforcement, some kind of consequence for their actions, I would feel better about them being there. But I would rather see dogs entirely excluded from Ocean Beach if their owners can't act in balance with the needs of the natural environment, and give the plovers and other shore creatures a safe place to live. Obviously, most dog owners are currently feeling quite comfortable ignoring the needs of the wildlife. I live along Glen Canyon and own three cats. I have had to make substantial accommodation for them to enjoy the outdoors, building an enclosure for them that lets them have a bit of sunshine without them being preyed upon by the coyotes in our canyon or themselves preying upon birds. To me, this is part of responsible urban pet ownership. I understand the frustration of dog owners at the limitations imposed on them by city life, but that's the point: we choose to live in a city and that choice limits our pet ownership options. It's not the responsibility of the city or GGNRA to provide enough parks so every city resident can have

a large dog and have a natural place to walk the dog where the dog can experience the excitement of chasing birds. There are limits. We MUST preserve the slim margins of natural habitats that contribute so much to the livability of our city.

Correspondence ID: 2161 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 11:28:52

Correspondence Type: Web Form

Correspondence: I strongly oppose any dogs in the GGNRA. In this, I am supported by many others; seniors like myself, disabled people, blind people, many of whom have refrained from using the GGNRA where irresponsible dog owners refuse (and most often are not able) to control their dogs. Dogs are a huge liability. You cannot share spaces with them; they run all over everything -- including you -- they bark, whine, yap, thus destroying the beautiful sounds of nature with their angry, hostile noise. They urinate and defecate everywhere. Some of them are vicious, and attack people and other animals at will. Even the leashed ones befoul any area they are in.

Not only are dogs a huge headache for everyone and everything except their doting owners, they are lethal to wildlife, which the GGNRA is mandated to protect. Here is a link to a recent study that gives evidence for this:

<http://www.care2.com/causes/animal-welfare/blog/mans-best-friend-is-wildlifes-worst-enemy/>

Thank you for your attention

Correspondence ID: 2162 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Thanks for allowing me to comment.

San Francisco is not the Marin Headland, nor is it Yosemite. Though parts of SF are under the GGNRA, the needs of SF citizens and their pets are much different than other locations.

Please do not create a policy or impose policy that is suitable for rural Marin Headlands or Yosemite on the very urban SF.

SF needs to continue having places to allow their dogs to run off-leash.

Correspondence ID: 2163 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,13,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: To whom it may concern, I am writing my express my concern and opinion about the ban of dogs on Muir Beach and the coastal trail, because this is the area I am familiar with and will impact my daily life. I have grown up in Muir Beach since 1963 and I live there now. Muir beach has historically always been a "dog friendly" area and should remain that way. The current dog management rules from the GGNRA have been and are working fine. Reading the report the impact of dogs on the area is inconclusive, but the impact of people is not, people have a large impact on the area, from childhood till now I can testify from my own observations people have a larger impact on the area then do dogs. Dogs are not the reason for the dwindling population of the Coho Salmon in redwood creek, it has been and continues to be the humans, I have seen this historically and continue to see it daily. My parents fought hard to help create the GGNRA, please remember this was intended to be a National Recreational Area not a National Park. Because of the residential area connected to Muir Beach it is unfair for the National Park service to impose a complete dog ban from the historically "dog friendly" beach. Making Muir Beach the "gateway" to the GGNRA, as I was told by one of the park rangers, will increase the human visitors to the area thus increasing a much greater environmental impact to the area. Building a visitors center at Muir Beach is a bad idea. I recommend better education of the pubic. Visitors should understand were the "dog friendly" area are (less then 2% of the coastal areas) and we need better signage and enforcement at the sensitive area. Please do not change the existing dog rules for this area.

Thank You, Aran Moore Muir Beach CA 94965

Correspondence ID: 2164 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,13,2011 12:52:09

Correspondence Type: Web Form

Type:

Correspondence: I fully support the plan developed by the National Park Service for the GGNRA. Dog management is crucial to protecting the environment and creating a situation where all people can enjoy these resources.

Candace Crockett

Correspondence ID: 2165 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,13,2011 13:35:26

Correspondence Type: Web Form

Type:

Correspondence: Dear GGNRA:

Being a surfer, hiker, and avid outdoorsman, I'd like to be able to take my dog to places I enjoy doing these activities, whether it be Santa Cruz, San Mateo, Marin, or my home in San Francisco; therefore, I'd like to see current GGNRA parks kept open to dogs under voice command.

I've spent \$800 on my dog's continued obedience classes, and I feel that he is well-behaved dog on- and off-leash. However, like all dogs, he needs exercise and time and space to run. And let's face it-dogs need space to run.

I live nearby Ocean Beach, and it seems clear to me that the larger issues are natural erosion, pollution/trash, vandalism (by people), and urban sprawl. These are the greater threats, not dogs. I can't believe that any assessment would demonstrate that dogs pose a greater threat than the pollution from the ocean-going freighters, runoff from the Bay Area, or the constant onslaught of plastics and trash that wash up everywhere, not to mention the trash left behind by beachgoers.

Last weekend, I spent Sunday afternoon at Muir beach. I didn't observe any off-leash dogs being a nuisance or contributing to erosion; rather, it was children climbing the hillsides and youth and adults rearranging stones in the creek outlet to the ocean (which appears to change with tidal flow); if there was any threat to the natural environment, it was man-made, including trash on the beach and in the creek. I also noticed that the area appears to be undergoing renovations by the park service; I did not see any signs of dog disturbances to wildlife or local flora or fauna.

I understand the need to protect endangered species, but mankind is the bigger threat here. As a species, we encroach on native lands. I don't understand what feels like a witch hunt against dogs. John Muir, John Steinbeck, and Jack London traveled with their dogs. They are all local heroes who supported the natural environment, its preservation, and its enjoyment for all. We already have too many limitations on pet-accessible areas. We don't need more. I find it unfair that the GGNRA proposes to eliminate 90% of off-leash areas, areas that have been legally used for 40 years.

The following represent my recommendations for the GGNRA regarding dogs:

San Francisco: Ocean Beach: Alternative A; no action. (Stairwell 21 to Sloat is too limiting.) Lands End: Alternative A; no action. Fort Miley: Alternative A; no action. Baker Beach: Alternative A; no action. Fort Point: Alternative A; no action. Fort Mason: Alternative A; no action. Sutro

Heights: Alternative A; no action. Fort Funton: Alternative A; no action. However, I can see the need to protect the beach north of Ft. Funton for habitat protection, but that area appears to be extremely prone to erosion from wind and sea-as is the entire bluff area south to Daly City. Chrissy Field: Alternative A; no action. I understand that dog owners should exercise common sense on days when the eastern beach area is occupied by beachgoers; however, there are many times (as on the evening of March 7) that there is no one on the beach. It doesn't make sense to close a beach to dogs when no one is using it.

Marin: Stinson Beach: Alternative A; no action. Rodeo Beach: Alternative A; no action. I would very much like to see this kept as an off-leash area. Muir Beach: Alternative A; no action. I can't image dogs not being allowed off-leash here. I'm not sure that dogs do more habitat damage than the children and young adults who run through and over the brush, contributing to erosion. There are so few beaches on the rocky coastline north of San Francisco. We should NOT take away or change access for dogs or dog owners. Homestead Valley: Alternative A; no action. Oakwood Valley: Alternative A; no action. Alta Trail, Orchard, and Pacheco Fire Roads: Alternative A; no action. Voice command. Fort Baker: Allow dogs; Alternative A; no action. Kirby Cove: Allow dogs (I believe this site is currently off-limits to dogs).

San Mateo: Pedro Point Headlands: Please institute dog access. Mori Point: Alternative A to allow on-leash access. No action. Sweeney Ridge: Alternative A; no action. Sharp Park Beach: Allow dogs.

New Lands: Alternative A; no action. Allow dog walking on new lands under title 36 Code of Federal Regulations 2.15.

If I may make several suggestions: 1) A special GGNRA tag for dogs to utilize park areas to help offset costs (make this \$12 or \$15) 2) Fine owners whose dogs are aggressive, chase birds, and are seen destroying protected habitat areas-as well as those owners that don't pick up after their pets. 3) Provide more gated/fenced areas in the city and at these GGNRA locations for pet owners to exercise dogs that may not be under voice command. Perhaps even have pet owners apply for a voice command permit/certification. 4) We already have too many rules, regulations, and laws. We don't need more.

Lastly, I don't understand the GGNRA's policy on "no dogs in campgrounds." What are families to do when they travel with their dogs for a day's outing? Leave the dogs at home? In the car? Since the GGNRA is trying to limit the number of dogs (3) that dog walkers can bring to areas, it doesn't seem feasible to put them in the care of dogwalkers.

I understand that Congress could resolve this conflict by codifying the GGNRA's 1979 Pet Policy as a Section Seven Special Regulation, and mandate that all properties added to the GGNRA after 1979 maintain historical recreational access. If the proposed policy is an attempt to "return to nature," then we'd better start by handing back all the land to the Native American peoples and their tribes, not enforcing trite codes.

If severe dog limitations go into effect, I am going to be sure to contact my congressional representatives and local politicians, as well as find out who the policymakers are so that these individuals can be voted out of office.

Sincerely,

Bill R. San Francisco

Correspondence ID: 2166 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 13:35:40

Correspondence Type: Web Form

Type:

Correspondence: Last week, while walking Ocean Beach, I noticed three young people, in their 20's or 30's, standing next to the shore, watching their three dogs, off leash, chasing the protected Snowy Plover flock some distance down the beach. The three young people felt this was good fun for their dogs and kept yelling encouragement, like, "get them". This was in a area very well marked.

The National Parks aren't for dogs, they are for people. I believe the National Park policy is no dogs allowed in National Parks.

Mr. O'Neill made a mistake years ago in allowing these morons on the Parks with their dogs. He shouldn't have done it, it is completely out of control, and now he has to correct his mistake. Relying on the dog owners is out of the questions. Just look at their letters to the Chronicle. If they bought a dog and the dog isn't happy in the city, why should the National Parks provide for them. I don't get it.

Also, why are dog walkers allowed on the Parks at all? This is a commercial endeavour. If I wanted to open a hot dog stand on Ocean Beach I would need a license and be subjected to regulations. Why would some idiot with a group of dogs not be required to obtain a license? After all, he's walking these beasts because their owners are too lazy to care for the dogs. So they hire a walker and tell him to take them onto a National Park and let them run free. The poor beasts have been cooped up all week.

Frankly, I don't like your plan at all. Dogs, and similar animals should be

banned in total from the Park property. Will the National Park accept responsibility when a person is bitten?

It's time for you to accept your responsibility to manage the Parks in the best interest of the people.

Thank you for your attention.

Timothy D. Cashman

Correspondence ID: 2167 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 13:38:16

Correspondence Type: Web Form

Correspondence: I would like to speak in favor of the GGNRA's preferred alternative in its draft DMP.

I and the members of my family are frequent visitors to and users of GGNRA owned and managed public lands. However, we are not able to use or enjoy, and are in fact completely excluded from, lands such as Muir Beach, Ft. Funston, and Crissy Field where unleashed dog use is currently allowed. The reason for this circumstance is that my 17-year-old son is afflicted with a childhood neurodevelopmental disability that has been variously diagnosed as either autism or Pervasive Developmental Disorder - Not Otherwise Specified (PDD-NOS). One of the most prominent and therapy-resistant symptoms or manifestations of my son's disorder is a fear of dogs. We believe this fear has its roots in a couple of regrettable incidents in early childhood when he was assaulted by aggressive dogs. (Fortunately the dogs involved in these assaults were on leash so they did not result in physical contact or injury.) Through work with therapy dogs and careful management of incidental dog contact in daily life my son has largely overcome this fear with respect to dogs on leash. However, his phobia remains undiminished with respect to off leash dogs, regardless of the degree of control of such dogs by their owners or companions .

The preferred alternative will make it possible for my son to visit portions of GGNRA lands where off leash dog use is currently allowed that we have never been able to visit. Such a change in land use management is fully consistent with and in fact mandated by federal law including but not limited to the Americans with Disabilities Act (ADA).

I would like to invite one or more GGNRA rangers or other personnel to accompany me and my son on a visit to one of the above-identified GGNRA sites where off leash dog use is currently allowed so that you can observe first hand how he reacts to off leash dogs. This first hand observation will

assist the GGNRA in understanding how off leash dog use effectively excludes a not insignificant portion of the disabled population from lands where such use is allowed.

Correspondence ID: 2168 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 13:48:04
Correspondence Type: Web Form
Correspondence: Enforce the policies you have now instead of adding new ones that we don't need and can't afford. Let dogs run leash-free where they now do and police parts of the recreational areas where they are supposed to be on leash or not at all. Enough tickets given out in the forbidden areas will convince the dog people to stick to the legal areas for leash-free dog fun. Clear signs designating the leash-free areas will also keep non-dog people from venturing into these areas. Do this and everyone can enjoy the magnificent GGNRA lands equally.

Correspondence ID: 2169 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 13:49:18
Correspondence Type: Web Form
Correspondence: Dogs were in Japan to help with rescuing victims, Dogs saved lives at 911, dogs help disabled, blind and other people who need a service dog. The amount of parks for off leash is small at best, responsible dog owners who have voice controlled dogs need a place for a healthy dog to run, play and get exercise. It has been working out for quite a few years. This is an urban environment, not a pristine wilderness. Our dogs need a place to play and be walked...please let our dogs play!

Correspondence ID: 2170 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am a dog owner and a dog lover. I completely understand the need for some regulation of dogs in the GGNRA and also the need to clarify the rules and regulations.

My comment is addressed specifically to Fort Mason. On sunny weekends the Great Meadow fills up with people. At many other times, however, the field is essentially empty, except for people with dogs. This is especially true during the week and on those days that are too cool or windy for people to enjoy sitting outside. I understand that people would like to come to Fort Mason to enjoy picnics, games, etc. without worrying about dogs. But the

number of days that the weather allows picnics, games, etc. are relatively few. The people who use the field most consistently are those who come to exercise their dogs.

I would propose a compromise. Fort Mason would have limited ROLA hours to allow dog owners to have use of the Great Meadow but also allow other people the opportunity to enjoy the field without dogs. Sat/Sun/Holidays would be on-leash only times. During the week there could be ROLA hours of approximately 3 - 6 or 7pm (depending on time of year). If a warm, sunny day fell during the week and there were a significant number of people without dogs using the field, rangers could suspend ROLA for that day. This compromise would require less enforcement work for rangers, would allow non-dog people to take advantage of the park when weather permitted, and, would give dog owners the chance to let their dogs run at the Great Meadow at those times when few other people are using the meadow.

Correspondence ID: 2171 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 14:35:54

Correspondence Type: Web Form

Correspondence: I stongly disagree with the Dog management plan in the GGNRA. I live in the outer sunset district and frequent Ocean Beach and Fort Funston a lot. I go with my Labrador dogs or to go surfing. OB and Ft Funston, for that matter, is rugged and cold. People don't frequent the beaches here nor swim in the 49 degree water and treacherous surf! I don't see the problem here. OB is not Malibu, crowded beaches in and out of the water. I think GGNRA should worry more about the beach erosion problem than wether a dog is on or off leash. It would sadden me and my family greatly if we couldn't enjoy our dogs at the beach off leash playing fetch in the water! I have never had an incident with my dogs and those of the dog walkers/owners in the GGNRA. Everyone seems to be careful and mindful to keep GGNRA open to dogs off leash. I can't say the same for the small neighborhood parks: (Stern Grove & Parkside Park)

Sincerely, Randy Reed

Correspondence ID: 2172 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 14:39:48

Correspondence Type: Web Form

Correspondence: I agree that dog control policy is essential to protect wildlife and non-dog visitor experience. I applaud and thank GGNRA for tackling this difficult issue, applying national park standards to urban and close-by lands not

traditionally regulated according to such standards.

I don't use the whole GGNRA; will limit comments to areas I know and use.

1. Chrissy Field. I support the alternative selected.
2. Marin Headlands. I support the alternative selected. I am esp. glad for no dogs on the Bobcat and upper Miwok trails.
3. Rodeo Beach. I support the alternative selected.

I am not clear about Tenn. Valley and its tributary trails to the north (e.g. Foxx). Per Map 7, none of these permit dogs. If that is the case, I support this! Tenn Valley has become an off-leash dog walk, with signs prohibiting routinely ignored. Dogs run over the trail shoulders and on the beach, chasing birds. Let me urge a separate map for Tenn Valley to make this absolutely clear. Tenn Valley is popular with visitors from afar (judging from license plates and car stickers); maybe less so for local residents?; I'm speculating a lot of dogs in Tenn Valley come with occasional visitors who don't think rules apply to them.

Good signage will be critical. Let me urge that one big dog (Dane? Shepard?) and one small dog (those tiny ones popular with city dwellers, who may carry them or put them in baby carriages - have seen this!) be illustrated in whatever design states "not allowed." People with little dogs seem esp. impervious to the notion that they have a dog, not a child.

Thanks for listening and good luck with this! GGNRA should be a world heritage site, it's so unusual and so precious as example of total country experience within such short distance from total city.

PS: Concerning ? on this page for hearing about NPS in the future: add "postings at trailheads." I think that's where I learned of this proposed rule, or maybe a ranger told me.

Correspondence ID: 2173 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Thanks to the GGNRA for waking up to the serious threat that dogs and irresponsible dog-owners pose to the fragile habitats found in your jurisdiction.

I grew up with dogs and considered them benign or neutral until I came to study the natural world. I now recognize that land stewardship cannot

simply be left to the discretion of dog-owners! You are doing a superb job -- even leaning over backwards to give dog-owners options.

PLEASE STAND FIRM BEFORE THEIR AGGRESSIVE TACTICS

Thank you for championing the wilds

JFGarcma, Berkeley

Correspondence ID: 2174 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 15:13:46

Correspondence Type: Web Form

Correspondence: Please continue to permit off leash enjoyment of a feature of life that is so important to us, so healing, so releasing from the day to day miseries of confinement to our Owners' very brutal world. As you might think considering my address, the dogs take me to walk daily at the Albany dump, a glorious remnant of untouched-ish civility. Thank you. Norma

you sent me paper mail , which I was glad to receive. Also, I heard about the recent meeting - a few days ago - from the radio.

Correspondence ID: 2175 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Our National Parks are our treasures. We were the first country in the world to have the foresight to set aside natural places for future generations. I am so grateful for that.

My understanding is that the GGNRA is the only National Park that allows off-leash dogs at all. Back when the GGNRA was first established, I'm sure that there were far fewer dogs in the area served by the GGNRA than there are now. I would also guess that the profession of dog-walking was not as extensive as it seems to be now. That combination of circumstances puts severe pressure on the environment of any park.

When I visit any of our National Parks, I want to be in the park, with nature, enjoying what is there. I prefer not to hear anything other than the sounds of nature and those of my fellow park visitors. That includes the barking and play-noises of dogs greeting other dogs.

I would also prefer that the natural environment of the park not be torn up

by the rough-housing of dogs.

When dogs are allowed to run free, they understandably get excited. If I were a dog, I probably would too. I am 76, not really frail, but no match for an excited dog much larger than a chihuahua. Dogs are also territorial and, when I am in the same space with them, as far as they are concerned I am in their territory. Not all dogs react in the same way to that situation.

I know that dogs need a place to be dogs outside of the confines of their owner's homes. The solution to the dilemma seems to be to set aside specific places where dogs can be dogs and people can have the rest of the space to themselves, without interference or possible physical inconvenience of an unwanted interaction with an excited dog.

As for the professionals who want to use the GGNRA in their business of walking dogs. I think that there should be a specific fee for that privilege, to help defray the cost of the inevitable wear and tear on the natural environment due to their activities.

Correspondence ID: 2176 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 15:48:59
Correspondence Type: Web Form
Correspondence: The preferred Alternative C balances the greater interests and ought to be adopted. No one can reasonably claim to be harmed by its provisions if they value the health of the parklands.

Correspondence ID: 2177 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 16:02:50
Correspondence Type: Web Form
Correspondence: I looked over the GGNRA Draft Dog Management Plan / Environmental Impact Statement As a horseback rider, I was satisfied with the sections that included continued use of horseback riding in the GGNRA park system.

Thank you for including the equestrians!

Correspondence ID: 2178 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 16:28:17
Correspondence Type: Web Form
Correspondence: Dear National Park Service - I am in the process of putting my thoughts together on the dog issue at Ocean Beach. You will be getting many more of

my letters before the deadline. It is a very complicated and complex issue in itself - but I am starting to understand where this tempest in a teapot, this total overreaction, has come from. Three letters today in the SF Chronicle were screeds against dogs and their pitiful owners - and you have pretty much fallen for this attitude hook, line, and sinker. You have abandoned all pretense of objectivity and farsightedness in your document, and need to balance your own very antidog stance. I have been walking my dog at Ocean Beach nearly every day for the past 15 years - there is no huge problem that can't be worked out - but you have to have a stronger belief in the basic right to have unleashed dogs for portions of the beach. The anti-dog mentality is way too strongly addressed in your study - and you have given very short shrift to the totally civilized concept of the sacred bond between dogs/owners and their needs (yes, most dogs benefit greatly from being able to exercise and run unleashed). Please, open your eyes and mind to a more equitable balance - our beloved dogs deserve your understanding. Sincerely, Peter Munks

Correspondence ID: 2179 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 16:54:03
Correspondence Type: Web Form
Correspondence: Hi,

My name is Antoinette Mogannam and I have boarded my horse at Mar Vista Stables in Daly City for 16 years.

My horse and I have been attacked by off leash dogs numerous times down on the beach below Fort Funston, once the police were involved as well as Chris Powell/GGNRA. One of the incidents, left my horse with numerous bites from an unleashed pit-bull, and a dog with a broken jaw - not the ending any animal owner wants. There have been other incidents such as these involving other equestrians, too many to count anymore.

My efforts in the way of phone calls to the rangers and letters to the GGNRA to do something about the growing off leash dog situation never seems to make a difference as enforcement stays minimal, phone calls to rangers ignored, and people and animals are still getting hurt.

I often feel a tragedy will have to occur before this problem gets resolved and the simple solution to keep dogs on leash finally gets implemented.

Thank you! Antoinette

Correspondence ID: 2180 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 17:16:18

Correspondence Web Form

Type:

Correspondence: PS: Should have noted I received word of extension of comment period by post card to above address. This contained info about email comment. When I checked how to comment over a month ago, I didn't see (or couldn't find) how to comment by email. If this is added, thank you!! Trouble to write a real letter, so I never got to it. Here: easy! LJ

Correspondence ID: 2181 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,13,2011 17:19:10

Correspondence Web Form

Type:

Correspondence: I am in support of Alternative A for Ocean Beach and Fort Funston. I feel that the National Park Service has imposed ever increasing regulatory oversight of the area. I have been at Ocean Beach longer than the National Park Service, and I have seen your agency impose stricter regulations over time, while apparently unable to enforce the regulations most of the time. The area south of Sloat is probably not attractive to Snowy Plovers as there is no suitable nesting area around the concrete rip rap, dirt cliff and scoured beach area. I have accepted the fact that I am not allowed to walk, run, and exercise my dog as I did in the past north of Sloat, off leash. I also have seen many more Plovers in the last week than the report shows. I try to walk and exercise my labrador retriever every day in this area. She is a retriever, not a Plover enemy. She wants nothing to do with shorebirds.

I find it amazing that so much effort is wasted by your agency to impose these ridiculous laws in this heavy urban area. Here we are in the most populated area of Central California, and you choose to exclude varied use of this area based on Snowy Plovers, just like what happened in Oregon at the dunes north of Coos Bay, after the ship the New Carissa ran aground and it was then declared off limits to humans by the USF&WS. I see that you are trying to do the same here. I assume you will probably try to ban humans from the same area, because you think it is easier to impose more restrictions than managing the existing regulations.

Alternative A is my choice, because I assume you will not remove the current regulations.

Correspondence ID: 2182 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,13,2011 18:52:04

Correspondence Web Form

Type:

Correspondence: I have owned 3 dogs, representing about 1/2 of my 64 years of life. I used to

run my dogs on beaches and in the street.

Now I see that dogs in parks are a big problem. Not just for wildlife, but also for children and adults. Just last weekend, I witnessed dogs overrunning an area of Crissy Field beach. Even though owners were picking up after their dogs, the area looked and felt unattractive to parents with children, not to mention wildlife. And on the Crissy Field grass, a blue heron stood at alert and quite concerned about the dogs off leash nearby.

I have reviewed the alternatives and the preferred plan, and basically agree with most of the preferred plan, although I would lobby for even more restrictive regulations at most locations. Actually, I prefer the most restrictive.

Correspondence ID: 2183 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 19:41:55

Correspondence Type: Web Form

Correspondence: Please keep spaces open for dogs off leash. With so many other choices available for people with out dogs, seems only fair the government designates areas for off leash dog use. Post signs notifying the public and give them the choice to interact with dogs on designated trails or opting to hike elsewhere where dogs are not permitted.

National Recreation Areas are for everyone, not just people without dogs.

Let's be fair, not biased.

Correspondence ID: 2184 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 20:14:24

Correspondence Type: Web Form

Correspondence: I support strong controls on dogs as a dog owner.

Correspondence ID: 2185 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 20:23:30

Correspondence Type: Web Form

Correspondence: It is most important to preserve and protect the natural environment, which does not include dogs. I would urge you to implement restrictions on allowing dogs in vulnerable habitats. Please hold firm. Thank you.

Correspondence ID: 2186 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: For me the GGNRA is an escape from the urban dog hassles of stepping over canine feces and barking, threatening dogs. Dogs have threatened me several times, only to have the owner/minder tell me not to worry because the dog doesn't bite. Dogs are best exercised in fenced "dog parks" where they are not a nuisance to those of us who do not want to be confronted by dogs and their owners.

Correspondence 2187 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,13,2011 21:19:10

Correspondence Web Form

Type:

Correspondence: Thank you for addressing this issue.

On many hikes and visits to GGNRA parks, I and my two young children, have been approached by unleashed dogs. Both of my children are now terrified of dogs and the owners have little remorse or concern for the safety or well being of my children. I often ask owners to leash their dogs when my children are around. I receive rude comments and many times people ignore my requests and do not leash their dogs. As a parent and visitor to the GGNRA I need authority and enforcement to ensure that people keep their dogs on leashes to keep the rest of us safe and free to enjoy the parks.

These are animals, they are unpredictable and are not valued above humans.

Pamela Taylor

Correspondence 2188 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,13,2011 21:58:11

Correspondence Web Form

Type:

Correspondence: Dogs are antithetical to preservation of natural and cultural resources which is the National Park's stated mission. So this plan is a failure to fulfill that mission in any meaningful way. No dogs should be allowed on national park lands except picnic areas and paved roads. To allow otherwise undermines the federal regulations on these lands and other national park lands.

Furthermore, even if it could somehow be justified to allow dogs on GGNRA land, this plan will be a complete failure without strict enforcement which is why this whole thing came about in the first place. With the federal government broke I can't see it dumping money on enforcing this complex dog rule proposal. So let's be realistic this plan is a loser. Who is going to pay for the hundreds of enforcers it would take to implement and enforce

this complex rule? Nobody that's who.

Correspondence ID: 2189 **Project:** 11759 **Document:** 38106

Received: Apr,13,2011 23:41:20

Correspondence Type: Web Form

Correspondence: Dear NPS:

I live in Berkeley and cycle through Area A of the Presidio and Marin Headlands regularly with my 6-year son. It is vital to preserve and protect sensitive natural resources, particularly endangered bird species like the Snowy Plover and other animals. The proposed NPS plan for limiting dog walking within GGNRA should be adopted without change.

This plan offers a good balance of access to dog owners while protecting wildlife and the quality of park experience. I am disappointed that many dog owners opposed to the plan cannot recognize the importance of protecting all animals in the park.

Correspondence ID: 2190 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 01:20:46

Correspondence Type: Web Form

Correspondence: Please do not allow any dogs off leash anywhere in the park. Please impose severe fines and punishments for those who allow their dogs to be off leash. I would very much like going to this space but feel threatened by dogs and aggressive dog owners. I enjoy the wildlife and have witnessed on more than one occasion dogs chasing and killing birds. Please take the rest of us into consideration. I love dogs and have one myself, but this is not an appropriate place to take a dog off leash. Thank you Gary Boren

Correspondence ID: 2191 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 10:05:06

Correspondence Type: Web Form

Correspondence: Area: Black Sands Beach in the Marin Headlands...AKA Upper Fisherman's Beach

Greetings: AS a long time beach-goer and user of this beach, it has been GGNRA's Policy that this beach is OFF LIMITS for Pets and Dogs..I wish to go on record that this beach and trail leading down to the beach CONTINUE to be OFF LIMITS to pets and dogs and or horses that would tear the trail apart....I personally feel ALL beaches within GGNRA should

be dog and pet free...Please keep my personal above information confidential please.

Correspondence ID: 2192 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 10:20:08

Correspondence Type: Web Form

Correspondence: I am the mother of a 13-year old daughter with serious learning disabilities. Like many children in her situation, she has a very difficult time socially. After receiving some good advice from my daughter's doctor, we brought a retriever into our family. The benefits to our daughter have been tremendous, as you might imagine. Of key importance is that our daughter routinely excercises our dog in the area bordering our home in Mill Valley, the Marin Headlands, and Muir Beach. This has been an incredible bonding experience for the two of them and a wonderful way for my daughter to safely hike on her own or with her other learning disabled friends. If the dog were not permitted to go with them, they would not be allowed to go for safety reasons. Getting learning disabled kids to feel motivated to venture into the world, let alone exercise independently, is a huge task which would be impossible without dog access to the GGNRA in our area.

It is my understanding that the GGNRA was established by Congress for use by urban residents for daily recreation, not as a protected wilderness. By eliminating dog access, you will be eliminating a HUGE part of the Mill Valley community's recreational opportunities. Our family, like countless others, moved to this area to take advantage of these opportunities. PLEASE don't take them away from us!!!

Correspondence ID: 2193 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 10:25:15

Correspondence Type: Web Form

Correspondence: I wish to object to the new regulations proposed to restrict off-leash dogs in the parks of the Golden Gate National Recreation Area (GGNRA). Public parks are meant to be a shared resource for the community. Dogs are only allowed off-leash in a small portion of parkland, it seems fair and reasonable to allow this part of the community a chance to use the parks.

Dog owners are probably one of the heavier users of public parks where dogs are allowed. The vast majority of dog owners are highly responsible about supervising and cleaning up after their dogs. That there is an occasional miscreant is to be expected and should not reflect badly on the 99% of dog owners that are being good stewards. I think it is discriminatory to focus on dogs. I find cyclists do much more damage to trails in muddy

weather leaving large gouges and tracks. Horses leave big piles of horse poop (which unlike dog poop is not picked up). However this is the price we pay for a large, heavily used park in an urban area. We have to share and be tolerant to the varied needs of our community members.

There are already restrictions in place to protect wildlife. People who wish to avoid dogs can easily do so since most parkland is already closed to dogs. I think local parks could be overwhelmed by dogs if the GGNRA land is made unavailable.

I think it is cruel to always keep a well behaved dog on a leash. I think it is unfair to take away the small portion of parkland currently open to off-leashed dogs. I think in an urban area, with a lack of open areas for dogs, this lack must also be taken into consideration. I would expect that if off-leash dogs are banned from the GGNRA that horses and cyclists will be as well for the very same reasons. Please don't deprive your biggest supporters of access to parks. I have come to a new appreciation of nature through my walks with my dog and I walk in a off-leash dog park daily. Isn't this the point of a park?

Correspondence ID: 2194 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 10:29:58

Correspondence Type: Web Form

Correspondence: As a frequent visitor to San Francisco, I have long enjoyed mine and my family's visits to the Presidio while we are in town. Recently, however, one such visit was severely disrupted when my 5 year old boy was terrorized by two dogs that had wandered out of sight of their owner. While we were cornered by the beasts, the only response of the owner was, "Oh, don't worry, they're friendly." Little consolation to a terrified little boy about to wet himself. I later witnessed other dogs rooting around, and defecating in one of the precious few areas that have undergone some native plant restoration work. Despite the presence of obvious signage illustrating the work that had taken place there, and several informative brochures noting just how rare of a micro-climate that portion of the S.F. peninsula provides, it almost seemed like the dogs were there specifically to undermine every attempt to give the part back to it's natural state. There are hundreds of acres available throughout the S.F. city park system available for dogs to play in, but only the National Parks have the purview of restoring native flora and fauna. Please limit the destructive potential of visiting dogs, by requiring dog owners to be just as responsible as they claim to be. Modern leashes still provide plenty of mobility, and it's not worth sacrificing the park's biodiversity, nor the hard work of the park employees and volunteers.

Correspondence 2195 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,14,2011 10:30:35

Correspondence Web Form

Type:

Correspondence: I would request that you insist that all areas on the listed parks be areas where leashes for dogs are required, and that you ban people with more than two dogs from the listed parks entirely. We have so few spaces in this city for wild animals, while this city has an abundance of homes, hotels, stores, restaurants, and more urbanized parks where dogs are welcome. Choosing the privilege of letting a dog off-leash in a particular area (when there are so many other environments for off-leash dogs) over the survival and well-being of a ground-nesting bird like the snowy plover strikes me as the worst kind of selfishness and entitlement, and not in keeping with the character of this city.

Correspondence 2196 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,14,2011 10:57:20

Correspondence Web Form

Type:

Correspondence: I have reviewed the GGNRA Draft Dog management plan and I am VERY CONCERNED about much of the plan particularly as it relates to Fort Funston. This park in particular (over Crissy Field and others) is particularly suited to off-leash dog walking. When the City of San Francisco turned the property over to the GGNRA I understand that it was with the plan to maintain it as a dog friendly park. You know the statistics of dogs per people in San Francisco and creating such SEVERE limits to the off-leash dog areas at Fort Funston is a very poor idea which will flood city parks. You are not balancing the best use and need for such a facility here in San Francisco. I believe that the native plant and bird advocates have overstepped reasonable bounds here as there are very few birds and plants native to this specific area (sand dunes next to the ocean) and the population of birds co-exists just fine with the dogs. I walk around the area on a regular basis. The people that both walk with dogs and by themselves currently co-exist very well and your recommendation DOES NOT address what the city wants and needs. To appeal to a small minority and reject the majority is in my opinion inappropriate and as such you have created a very flawed plan here. Poll the majority of San Francisco residents and voters and I believe that your proposal would be soundly rejected. Since we live in a democracy, I hope your final plan represents the wishes of the majority of San Francisco residents which is to leave off-leash dog walking as it has been in the past at Fort Funston.

Correspondence 2197 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,14,2011 11:40:05

Correspondence Web Form
Type:
Correspondence: GGNRA,

I wanted to take a moment to voice my support for the recommended changes to the current dog walking rules at Crissy field. I love Crissy field, but I don't like the dog owners and their dogs for turning into one big off-leash extravaganza. Instead of smelling like ocean air, the place smells of dog urine. My son has been scared multiple times by a wandering off-leash dog, with a surprised owner saying he won't bite, he's friendly. Not every body wants to know or be bothered by their animal. If dogs can come to Crissy field without rules, why can't horse owners do the same. Make rules and enforce them without hesitation.

Please don't be afraid of the canine bullies and their typical tactic of being loud and ready to speak into a television camera. The majority of people who enjoy the GGNRA, appreciate the natural setting and don't want to be bothered by this irritating and potentially deadly nuisance. Do we have to wait until one of these so-called friendly dogs attacks someone before action is taken.

Stand your ground, set policies for the majority, and continue to be a trend-setter instead of door mats for the canine collective. There are plenty of people like myself who support your efforts. If you made a request for the supporters of your efforts to hold a gathering to show their support, I would be there.

Vincent

Correspondence ID: 2198 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 12:50:41

Correspondence Type: Web Form

Correspondence: I have read your documents regarding the access by dogs for the Rodeo Beach and surrounding trails. I support plan 6A for the beach and 7A for the surrounding trails. Although I have never seen a dog near the lagoon area, I also support the proposed fence along the lagoon. I have hiked for 50 years in these areas, the most recent 15 years with my dogs. I have never had a negative incident regarding dogs in all that time. Rodeo Beach is the most accessible beach for me as I have a disability which limits my driving to West Marin. It is such a treat to take the dogs to Rodeo Beach. There are relatively few people on this beach and the gravel beach provides good footing for me. The dogs can run and play in the surf safely, chasing balls and sticks. The surrounding trails provide lovely views. No dog, mine or others, on or off leash, has ever been a problem for me in this area. In this

day of obese sedentary children and adults I would think you would have a mandate to encourage all forms of outdoor activity, including running with dogs in an open area. Many people will not take long walks if the dogs can not run free and will curtail their activity if they have to hold the dog on a leash. With my disability, it is difficult to go out walking with my dog on her leash. I have watched as year by year dogs are more and more restricted, more and more confined to sedate walks in limited areas. I hope you do not close off yet one more wonderful place to be free.

Correspondence ID: 2199 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 13:07:54

Correspondence Type: Web Form

Correspondence: I am an environmental activist and believe in preserving the integrity of our national parks. However, after living in SF with a dog for the last 4 years, I also believe in protecting off-leash areas for city residents and their animals. The amount of space dogs have to run off-leash is limited in the parks. Please consider the unique SF history of off-leash space for dogs if a change is made in the management of our beloved places: Crissy Field, Fort Funston, and Baker Beach in particular. It is a "green" city, partly because of how dog-friendly these places are. Thank you.

Correspondence ID: 2200 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 13:09:47

Correspondence Type: Web Form

Correspondence: HI strongly encourage the Park Service to protect natural areas as well as protect it's visitors in the park by having strict on leash dog policies.and minimal off-leash dog areas.

In most every park in the US that I have been in dogs are kept on leash and people abide by these rules. Here in the Presidio dog walkers feel it is their right to let their dogs run anywhere.

As a mother of two children it is important to make sure the park is safe and stress free for little hikers.

Thank you.

Correspondence ID: 2201 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 00:00:00

Correspondence Type: Web Form

Correspondence: To Whom It May Concern

I am very sorry to see the plans the NPS has come up with to change the way dog owners can use the GGNRA. The plan is called "Dog Management Plan/Environmental Impact Statement". The purpose of the plan/DEIS are described in the following 4 points. 1. provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park; 2. promote the preservation and protection of natural and cultural resources and natural processes; 3. provide a variety of visitor experiences, improve visitor and employee safety, and reduce user conflicts; and 4. maintain park resources and values for future generations.

To organize my comments I will base my feedback on those four points.

My name is Jerry van de Beek. I have lived on the edge (WUI) of the GGNRA National Park at the trailhead of the Miwok Trail for the past 11 years. I walk with my dog on the Headlands on a daily basis and on weekends at Muir Beach. We share the trail with other hikers, mountain bikers and people on horses. This diversity is interesting and mostly fun. I can't see a reason why we need a specific dog management plan and the reasons as given by the NPS for this plan are not based on accurate research or fact.

1. I don't feel we need to add restrictions to the usage of the GGNRA, which we then have to spend money on to enforce, especially as the reasons for these restrictions are based on false facts and a specific skewing of the NPS's own scientific research. (See below for reference). Policing the GGNRA would create a very negative atmosphere. However, educating people and make them feel a part of and responsible for the well being of the GGNRA is I think a much better policy.

2. Dogs do not have a negative impact on the environment. I feel strongly that the singling out of dogs as the perpetrators of soil erosion and damage on NPS land is absurdly overstated. They no more erode the land and arguably do less damage than the daily sightings of hikers, casual walkers, horses, mountain bikers or fishermen. I think everyone using the GGNRA can do better, like encouraging families to pick up trash when leaving the beach, not throwing empty water bottles in the bushes and discouraging after sunset drinking on the beach but I cannot see that, specifically, people walking dogs are causing such excessive harm to our environment that there is need for this over-inflated and amazingly expensive draft. I would also like to add that I noticed the NPS always use pictures of people walking more than one dog. In fact you mostly show dog walkers with 4 or 5 dogs. This is an enormous misrepresentation of the vast majority of dog owners that use the GGNRA as a whole.

Repeated claims are put forward by the NPS that dogs, and especially off-leash dogs, pose a significant danger to plants, birds and other wildlife. These claims are stated as fact and are being used to justify the need for significant restrictions on access to beaches and other areas in the GGNRA by off-leash dogs. In fact the reverse is true. Assumptions about the effects of "disturbances" on Snowy Plovers and other shorebirds by off-leash dogs have also been disproved by many studies like the 2007 study by Megan Warren at Crissy Fields and two other sites at Point Reyes ? all NPS land. More excerpts of these studies are attached at the end of this letter.

3. A well-exercised dog is a well-behaved dog. Dog owners carry the responsibility for the actions of their dog. There is no evidence that allowing dogs to go off-leash, for play opportunities and socialization experiences, increases the incidence of aggression toward a person. Every reputable expert working in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access decreases the likelihood of aggression. Again I have been on these very trails for the past 11 years, twice a day, and have never been attacked by a dog. Portraying dogs as aggressive and something to fear is just a tool to push the agenda of this extreme plan. Specific studies disproving that off-leash dogs are dangerous to visitors are attached at the end of this letter.

4. We all have to help maintain the parks for future generations. I can appreciate that especially as I use the GGNRA every day. Again, I see no reason to impose restrictions on people who want to walk their dog on the trails and beaches of the GGNRA as these restrictions do nothing to help to maintain the park. Moreover they are singling out one part of the urban population that uses the park for daily recreation as mandated by Congress when the GGNRA was established. NPS would do well to note that the GGNRA was specifically established by Congress as an area of urban recreation, for mixed use, and not as a protected wilderness.

I hope I will be able to continue to hike on the GGNRA and enjoy our beautiful landscape with my dog and all my neighbors and their dogs. Therefore I urge the NPS to reconsider their plan and I request that the current rules relating to dogs - those of limited areas of leash control but mostly dogs under voice control - be upheld and left unchanged as we, after all, talking about less than 1% of all the total acreage of the GGNRA.

Please see the research excerpts at the bottom of this letter.

Thank you for your attention,

Jerry van de Beek Mill Valley CA 94941 Research Addressing Point 2

The November 15, 1996 report "Western Snowy Plover (a Federally

Threatened Species) Wintering Population and Interaction with Human Activity on Ocean Beach, San Francisco, GGNRA, 1988 through 1996" by Daphne Hatch found that there was an increase of more than 100% in the number of snowy plovers in the years after the 1979 Pet Policy went into effect (allowing dogs off-leash on Ocean Beach and elsewhere). Hatch could not find any negative relationship between the number of dogs on the beach at a given time and the number of plovers on the beach at the same time.

A follow-up 2006 Hatch Report considers effects on the numbers of plovers after two Federal Court rulings reinstated the 1979 Pet Policy, allowing off-leash dogs back on Ocean Beach. The maximum number of plovers ever recorded was in 1994, a time there were no restrictions on off-leash dogs on Ocean Beach. Numbers have varied since then (from a low of 14 in 2000 to 35 in 2005), but there is no correlation between when numbers were low and when dogs were allowed off-leash. For comparison, there has been a similar change in plover populations at a no-dog beach at Half Moon Bay State Park (designated as Critical Habitat for the birds) (personal communication from plover monitoring group). At that beach, there was once a maximum of 60 plovers, but currently only 25-30 are present. This decrease cannot be blamed on dogs (since they're not there), and appears to mirror what Hatch reported at Ocean Beach. Therefore, it's possible that some larger issues are responsible for plover numbers, not the local conditions (dog or no dog) at each beach.

"Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover", Megan Warren, UC Berkeley Environmental Sciences 196, Senior Research Seminar, May 7, 2007. Before beginning the study, the researchers "hypothesized that designated off-leash areas would represent comparatively poor habitat and would negatively influence diversity and/or abundance of birds and small mammals relative to nearby habitat where dogs were required to be leashed within the same urban park system? [On-leash sites] were believed by city officials to have high public compliance with leash laws. Off-leash sites were either in officially designated off-leash areas or, in two cases, in areas that were designated as on-leash but were known to experience frequent use by off-leash dogs and their owners." Researchers conducted bird surveys in all 56 sites (half off-leash, half on-leash) a total of three times between May and July 2002. Each survey involved a 5-minute, 100 m, fixed radius point count, followed by a 5-minute playback of a black-capped chickadee mobbing call (known to attract several bird species and used to increase detection of less vocal species). A 5-minute post-playback point count concluded the survey. Researchers recorded all birds that were seen or heard during the 15-minute period. They only counted birds if they interacted with the environment (that is, they did not count birds flying over the survey site). Small mammals were live-trapped at a randomly selected subset of 32 of the original 56

sites.

They found that "Designation of sites for dogs to be on- or off-leash had no measurable effect on the diversity or abundance of birds and small mammals within the sites that we surveyed in the Edmonton River valley. There was a similar lack of difference in bird abundance when we restricted analyses to only those species that appeared to be breeding, only those species that nest on the ground or in low shrubs, and only the most abundant

Research Addressing Point 3

During the course of Negotiated Rulemaking, claims have been made that "literally hundreds of off-leash dogs have been lost, injured, or killed while roaming the [GGNRA] off-leash." (Emergency Petition to the GGNRA, p.20) These claims have been used to justify restricting off-leash access ? it is necessary for the protection of the dogs. Is this accurate? Analysis of incident reports from 2001 to 2006 provided by the GGNRA yield the following information: There were a total of 62 incidents involving dogs over the course of the six years from 2001 to 2006. The claim of "hundreds" of incidents involving dogs in the GGNRA is, quite simply, false. When you consider that tens of thousands of dogs visit the GGNRA each day, the total number of incidents reported is miniscule. The incident report 4161 incidents involving people. The GGNRA is not an unsafe place for off-leash dogs. Interestingly, comparing the numbers in the table between dogs and people indicates that the GGNRA is significantly more unsafe for people than for dogs.

At the February 8, 2007 meeting of the San Francisco Animal Control and Welfare Commission, Jean Donaldson, the founder and director of the SF/SPCA Dog Training Academy, testified on this issue. Donaldson has over 30 years experience in dog behavior and training, and is the author of several books, including *The Culture Clash*, which was voted the Best Behavior Book of 1997 from the Dog Writers Association of America and is the #1 book recommendation for dog owners from the Association of Pet Dog Trainers. At the Commission meeting, Donaldson said (a complete transcript of her statement is at the end of this issue summary):

There is not only no evidence that allowing dogs off-leash for play opportunities increases the incidence of aggression, to a person every reputable expert in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access decreases the likelihood of aggression. There is no research demonstrating that dog parks or off-leash play contributes to any kind of aggression, including dog-dog aggression. It was brought to my attention a couple of months ago, that claims were being made that such research existed. And so I did an exhaustive literature search as well as consulting at length numerous colleagues in dog behavior in the

United States. All were amazed at the suggestion in view of no such research. Trish King, my counterpart at the Marin Humane Society, has been publicly quoted several times as having authored research concluding off-leash play contributes to aggression. I spoke to her at length about this and we corresponded in the last couple of weeks. She has not performed or published such research. She is furthermore, and I quote, "mortified", unquote, that anyone would suggest or imply that. She believes off-leash access, if anything, prevents aggression. Priscilla Feral, the president of Friends of Animals, often has also been quoted as opposing off-leash access. I spoke to her this past Monday regarding Friends of Animals' position, and she was adamant that statements suggesting that Friends of Animals oppose off-leash access are false. The same holds true for Kathy Santo, a nationally recognized colleague of mine. I also spoke to her this week. She followed up the conversation with me with an email, which I will now quote: "Hi Jean. I wanted to email you and clarify my stance on dogs engaging in off-leash play. I strongly believe that it is good, or more accurately necessary for healthy dogs to play off-leash in safe areas while supervised by their owners. An exercised, socialized dog is a happy and well-adjusted dog." Clearly, there is no compelling reason concerning the safety of dogs themselves to restrict off-leash recreation in the GGNRA.

There is no public safety crisis involving dogs in San Francisco. According to SF Animal Care and Control, about one-quarter to one-third of all households in San Francisco have at least one dog. Therefore, ACC estimates the total number of dogs in the City to be about 120,000 to 140,000. The total number of dog bites reported in San Francisco in 2004 was 384, down 20% from the number in 2003 (SFPD testimony before SF Police Commission, and private communication; this is the last year for which I have information). But ? and this is a big "but" ? San Francisco does not separate incidents where dogs bite other dogs from incidents where dogs bite people when it reports the total number of dog bites. Since the vast majority of dog bites involve one dog biting another, the number of people bitten by dogs is actually significantly lower than the total number suggests. Considering the number of dogs in San Francisco, the number of bites is extremely small. Do the math: 120,000 dogs times 365 days a year equals the potential for a minimum of 44 million bites each year. The actual number is 384 (a significant number of which are dog-dog, not dog-people bites). Reports of serious dog bites and fatal dog attacks make the news precisely because they are unusual and rare. In one of the most comprehensive analyses of injuries due to dog bites, Canadian researchers searched a national database of all reports of injuries throughout Canada in 1996 (Canadian Hospitals Injury Reporting and Prevention Program, or CHIRPP; the study can be found at: http://www.phac-aspc.gc.ca/injury-bles/chirpp/injrep-rapbles/dogbit_e.html) Dog bites represented 1% of all injuries in the CHIRPP database. The CHIRPP analysis found that children between 2 and 14 years of age sustained over 70% of all bites. Most of the

dogs involved in bite incidents (65.2%) were either part of the family, part of the extended family, or part of a friend or neighbor's family. Only 12.2% were stray or unfamiliar dogs. The majority of the dog bites (64.5%) happened in someone's home (either the victim's or another person's home). Only 3.1% of dog bites (38 total) occurred in a public park. In other words, bites occurring in locations similar to the GGNRA accounted for a miniscule 0.02% (2/100th of one percent) of the total number of 188,717 injuries in the database that year. A majority (50.3%) of victims had been interacting with the dog before the bite: 19.3% were petting, handling, feeding, or walking with the dog; 17.5% were playing with the dog; 7.8% had hurt or provoked the dog; and 5.7% were disciplining the dog. The Canadian results are similar to those reported in the US. The Centers for Disease Control's MMWR weekly from July 4, 2003 says that 42% of all dog bites occurred among children under 14 years of age, and cites research that indicated that in children under 18 years old, 80% of bites were inflicted by the family's (30%) or a neighbor's (50%) dog. Children are primarily bitten by dogs they know, not unfamiliar or stray dogs that run up to them in a park.

In testimony before the San Francisco Animal Control and Welfare Commission on February 8, 2007, Jean Donaldson, the founder and director of the SF/SPCA Dog Training Academy said:

Off-leash play has not proven to be a factor in dog bites. According to both the Centers for Disease Control and Prevention and the American Veterinarian Medical Association, the majority of bites take place on the guardians' property. The remaining incidents involve dogs that are either restrained, i.e., leashed, or dogs that are "at large", [that is,] unsupervised dogs that have escaped confinement. Consider for example, the three highest profile serious dog attacks in the history of San Francisco. Those are Diane Whipple in 2001, Sean Jones in 2001, and Nicholas Faibish in 2005. In the first, the dogs were on-leash. In the second, the dogs had escaped confinement in the backyard and were at large. And in the third, the dog was confined in the guardian's home. I would add that in all these instances, the dogs were un-neutered. Interestingly, it could very well be that the safest dogs are those that attend off-leash dog parks. Shyan and cohorts published a research paper in 2003 in the Journal of Applied Animal Welfare Science, which looked at the prevalence of interdog aggression in dog parks. Dog-dog problems turned out to be minimal and of a non-serious nature. While the paper did not consider the question of dog-to-human aggression, the obvious interpretation of this low incidence of aggression was interesting and I think very relevant. They suggested that self-selection operates strongly, i.e., people who take their time to get into their car or walk to a designated off-leash area to exercise their dog tend to not to be the type who are derelict in other areas of dog guardianship, such as training, socialization

or appropriate containment.

As is clear from all of this, the chance of being bitten in a park by a strange dog that you have not interacted with is pretty slim.

Consider where dog bites rank in the context of accidental injuries for people in general. According to the Centers for Disease Control's WISQAR (Web-based Injury Statistics Query and Reporting System, accessible at: <http://www.cdc.gov/ncipc/wisqars>; this site tracks injuries treated in hospital emergency rooms) site. Dog bites represent 1.1% of all accidental injuries. At least four of the injuries on the list are not only more common than dog bites, but could easily happen to visitors in the GGNRA ? fall, overexertion, motor vehicles, and cyclist. If off-leash access is restricted in the GGNRA to "protect" the public, then walking, hiking, all motor vehicles, hang gliding, rock climbing, and bicycling should similarly be banned. These activities combined account for 52.8% of all accidental injuries. Once again, the low frequency of dog bites, especially when compared to other more common causes of injury, indicates that bites cannot be used to justify restricting off-leash access.

Correspondence ID: 2202 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 16:15:42

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I would like to express my very strong support for the NPS preferred alternative for dog management on the parklands of the GGNRA. Although I realize that dog owners are a very vocal segment of the park users, they are only one of many users and need to be more sensitive to the needs of the others -- in particular the native plant and animal species that are highly impacted and in some cases even endangered. The parks are one of the few refuges left for these species, and we cannot allow continuing disturbance of their habitats because of one vocal group's insistence on access.

Unfortunately dogs aren't really part of the natural ecosystem, and their presence is generally disruptive at best and quite destructive at worst when, for example, dogs go into fish bearing creeks with spawning redds, etc. As a hiker and park user, I would prefer to enjoy nature without dogs on the trails, but do not object to on-leash dogs in appropriate areas i.e., those without sensitive species and habitats. However, few owners comply with leash laws and, in my experience, "under voice command" is generally ineffective, with consequent concerns both for people (esp. children) and other dogs.

I believe the Park Service has done an excellent job of weighing data,

developing a sound plan, and providing opportunities for public comment. I hope you will consider the majority of us park users who are not dog owners, as well as holding to your mandate to protect the resources of the parklands for all and for future generations and will implement your plan as proposed.

Thank you for the opportunity to comment.

Correspondence ID: 2203 **Project:** 11759 **Document:** 38106
Received: Apr,14,2011 16:51:20
Correspondence Type: Web Form
Correspondence: Enough is enough! It is tiresome to reopen this battle every few years. Please leave the access to this recreational land as it is currently. there is really no need to change the policy. In San Francisco, where we have more dogs than kids (and I have both) it is absurd to act like the needs of dogs and dog owners can be ignored. One of the great treasures of my life is walking with my dog at Fort Funston. As proposed, the rules would allow me to walk down to the beach on one of the parking lot, but if i came up the southern stairs to the parking lot i would get a ticket. This is insane. Please use your limited resources more efficiently and do not revisit this issue time and time again. How many times must we fight this proposal? I would much rather use my advocacy in other arenas, like fighting the lack of resources for the EPA or for education or health services.

Correspondence ID: 2204 **Project:** 11759 **Document:** 38106
Received: Apr,14,2011 16:57:18
Correspondence Type: Web Form
Correspondence: I am saddened by the changes proposed for Crissy Field. I can live with most of them but the worst one is no dogs in the INLET between CENTRAL BEACH and EAST BEACH.

On any day whether high or low tide that is the dogs and owners favorite place. Dogs LOVE running through the water to retrieve balls or chase each other. That area is always different and creates a shallow area for running.

I feel that dog owners would be happy to follow the new rules were that area included for dogs under voice control. As things stand now, dogs will still want to claim that area which will lead to problems that could be avoided.

Children picnicking and boaters are never in that area. That beach has always been a haven for dogs ALL YEAR ROUND, if we are to lose it at

least don't take their favorite part. We are true lovers of the beach not just seasonal ones.

Thank you, Elizabeth Martin

Correspondence ID: 2205 **Project:** 11759 **Document:** 38106
Received: Apr,14,2011 17:30:12
Correspondence Type: Web Form
Correspondence: What percentage of grassy park area in SF can an inner city kid sit down on with a low-probability of sitting on or smelling dog shit?

Where can a poor yard-less little kid experience nature without a shit-smelling dog jumping on him/her?

Correspondence ID: 2206 **Project:** 11759 **Document:** 38106
Received: Apr,14,2011 17:56:00
Correspondence Type: Web Form
Correspondence: I want alternative A - no change.

Correspondence ID: 2207 **Project:** 11759 **Document:** 38106
Received: Apr,14,2011 18:09:50
Correspondence Type: Web Form
Correspondence: After visiting Fort Funston, I came face to face with the enormous dog population there. If i saw 200 animals in 2 hours, only about 30 were humans! At the meetings we held, I repeatedly heard that reducing the off leash space at Fort Funston would cause an undue hardship on those owners who have bad knees, walk with canes or are otherwise debilitated in some fashion or another. The vast majority of those that I held long conversations with were adamant that access to the lower beach was prohibitive and unsafe for some and dangerous for others. So, I went there and walked down to the shoreline and I agree with their assessment. Some kind of new access should be formed there, a walkway, steps, sandladders or something. Making the beach unrestricted and accessible will take away the argument that "there is no other place for us to take our dogs to the water." It will also keep good faith between the Park Service and all those dog owners who want to be "cooperative". [and more obvious signage that spells-out the new rulings will eliminate guessing and confusion and make for easier 'compliance']

Correspondence ID: 2208 **Project:** 11759 **Document:** 38106
Received: Apr,14,2011 19:58:24

Correspondence Web Form

Type:

Correspondence: In the late 60's when I was a college student at the University of San Francisco I worked to establish the GGNRA. The vision to create an expansive wild space near such a dense urban environment that would provide a "lung" for urbanites and their families was realized in 1972.

The GGNRA has for decades provided open space for all to enjoy. And the "all" includes dogs because they are a part of families.

The small percentage of open space that allows dogs should be left unchanged because it provides for those of us who may not be able to otherwise use the area.

One of our sons and his family live in San Francisco. As families we frequent Crissy Field with our dogs. Those who are critics need only to observe the joy and happiness that prevails there. There have been several times when I have encountered dog-less families who go there to play with dogs or others there to scout out a particular breed. It has always been a civil and neighborly experience.

To remove these dog friendly areas as you propose is to deny the purpose for which the GGNRA was established and for which I so diligently volunteered.

Sincerely,

Barbara K. Westover, Architect

Correspondence ID: 2209 **Project:** 11759 **Document:** 38106

Received: Apr,15,2011 08:34:01

Correspondence Type: Web Form

Correspondence: As a professional landscaper and gardener I feel very strongly that dogs should be kept on leashes to minimize their negative impacts in delicate areas. Even the most responsible of dog owners cannot prevent their dogs doing damage if they do not have constant control of the animal's whereabouts. The only way to achieve such control is by requiring that the animal be kept on a short leash. Many people may feel that their dog can't possibly do any damage but those people are wrong. All it takes to kill a small, delicate plant is the urine, feces, or trampling of one dog. When that is multiplied by hundreds or thousands of visitors per week then it comes as some surprise to me that dogs are allowed in areas such as the Presidio at all! Responsible dog owners already know all of this and they act accordingly. The employees of the Presidio should be empowered to prevent

the carelessness of the irresponsible owners. If left up to me, dog enthusiasts would be required to go to a different park altogether. There is really no place for pets in an area being so painstakingly restored!

Correspondence ID: 2210 **Project:** 11759 **Document:** 38106
Received: Apr,15,2011 09:26:36
Correspondence Type: Web Form
Correspondence: please ban dogs in as much of the ggnra space as you can. corral them into a few of the least sensitive areas. they should not be allowed to roam as much as they currently are in so many semi-pristine areas. keep them concentrated where they will do the least damage and away from non dog owners.

Correspondence ID: 2211 **Project:** 11759 **Document:** 38106
Received: Apr,15,2011 10:34:26
Correspondence Type: Web Form
Correspondence: The purchase of the Mori Point property by the GGNRA a few years ago and the consequent work done by the park employees and volunteers is an amazing improvement and a work of art. Unfortunately there are still many who walk their dogs off leash and allow them to root around the newly planted areas. Off leash pets should not be allowed on any GGNRA property where the tax payers money and the park service efforts are compromised by thoughtless dog owners.

Correspondence ID: 2212 **Project:** 11759 **Document:** 38106
Received: Apr,15,2011 12:54:11
Correspondence Type: Web Form
Correspondence: Please allow the dogs to run free or under voice control on the beaches. For me I'm a user of Rodeo Beach and Crissy Field. This document is much too confusing for the average individual.It should be much simpler. Let the dogs off lease or not..where etc.That is probably why the signs are disappearing. You are getting a biased view from those that are computer literate. You should have a telephone number and have extensions to register comments. Sincerely, Jennie Wasser

Correspondence ID: 2213 **Project:** 11759 **Document:** 38106
Received: Apr,15,2011 14:37:14
Correspondence Type: Web Form
Correspondence: I am a resident of San Francisco, and I have walked my dogs in the GGNRA

since 1991. I completely opposed to the GGNRA's attempt to restrict current off-leash areas. I have 3 well socialized and well behaved dogs (2 small, one medium sized) that have been rescued from SF Animal Care and Control and local rescue groups.

I currently live in the Mission district, and at least five times a week I visit either Ft. Funston or Crissy Field. Occasionally I visit Lands End. I also frequent Pacifica's Mori Point area and Montara's Sweeney Ridge as well. Previously, I lived in the Sunset district, where I walked daily my dogs daily at Fort Funston.

One of the most important reasons I continue to live in San Francisco is the off-leash walks I can take with my dogs in various GGNRA locations. These walks provided fresh air, exercise, and opportunities for both human and canine socialization.

Currently less than 1% of the GGNRA allows off-leash recreation, and now the GGNRA wants to reduce that even further. Is it too much to ask that we retain the usage of this small amount of space as it has been for many, many years? I propose the GGNRA should develop a NEW alternative, that would not only KEEP the current areas off-leash, but also lead to development of ADDITIONAL off-leash areas in new land obtained by the GGNRA. The GGNRA should be expanding not reducing off-leash locations.

GGNRA is a RECREATION area. Off-leash areas provide much needed recreation to both dogs and humans living in the urban environment of San Francisco. When GGNRA was created in 1972, it was established with the intent to continue to provide needed recreational open space. Off-leash dog walking was acknowledged as one of the traditional recreational uses taking place in the GGNRA when it was created. By proposing to drastically diminish off-leash areas, GGNRA is not honoring the agreement by which it was handed over by the city. These off-leash areas are a part of the tradition of the Bay Area, they have been around for a very long time with support of the community.

There is a definite need and desire for off-leash space in the GGNRA. A visit to Fort Funston or Crissy Field on any weekend is proof of just how utilized these off-leash spaces are by the community. Has GGNRA done a study to see exactly how many people utilize these spaces for off-leash activity? I know the results of such a study would show A LOT of people and dogs. So many times I have been to Fort Funston on a weekend and the parking lot is packed. The majority of the people are there with a dog. If these spaces are taken away or even reduced, there really is no comparable alternative for people to turn to.

I attended a recent open house hosted by GGNRA, and was told by one of

the rangers that dog 'incidents' were one reason why they wanted to take away off-leash areas. However, this is not backed up by GGNRA's own statistics. Incidents involving dogs is extremely low, whereas incidents involving people (and no dogs) make up the majority of reports. Using the GGNRA's reasoning we should also ban people from these areas.

During the approximately 20 years that I have frequented the GGNRA with my off-leash dogs I have observed the following:

1. The majority of dogs are well behaved and enjoy interacting with one another.
2. Dog guardians tend to be responsible and pick up after their dogs.
3. Dog groups organize ongoing clean-ups to assist in the park upkeep.
4. Dog guardians often pick up trash left by people, in order to help maintain the parks.
3. Dog guardians care a lot about animals, nature, and conservation.
3. People use these areas to both walk dogs and socialize with friends and relatives.
5. Dogs that are well exercised are better behaved.
6. Dogs are social animals, and off-leash areas provide a way to dogs to socialize in a way that is natural to them.
7. City parks offer significantly smaller off-leash spaces. If GGNRA reduces the current off-leash space, off-leash city parks will be much, much too crowded.

Finally, I would like to say that the preferred proposal for Fort Funston is extremely drastic, especially considering this seems to be one of the most frequented locations of all. It would be completely unfeasible for many people who are elderly, disabled, or not physically fit enough to descend either of the extremely steep trails down to the beach to reach the off-leash areas. (Besides the fact that at high tide there can be little beach to even walk on.)

I see many disabled and elderly people at Fort Funston with their dogs. The GGNRA's proposal to take away the majority of off-leash areas on the upper cliff tops would in essence make Fort Funston inaccessible to many populations. I myself have a permanent disability that makes reaching the beach very difficult, so I walk on the upper cliff areas. My elderly father, who has undergone quadruple bypass surgery and also suffered a stroke, still walks his two small dogs in the upper areas at Fort Funston. Yet, if GGNRA's proposal is passed, this would be an nonviable location for many people that currently go there.

The GGNRA tried to take off-leash areas away from the citizens of San Francisco once before and lost, and now they are trying to do it again. Enough is enough. We live in a highly populated urban area, and GGNRA is a recreation area, not a National Park. We need more recreational space, not less. Retaining < 1% of GGNRA for off-leash dog walking is not too much to ask for the citizens of the Bay Area.

Sincerely, Leigh Moyer

Correspondence ID: 2214 **Project:** 11759 **Document:** 38106

Received: Apr,15,2011 17:21:25

Correspondence Type: Web Form

Correspondence: The proposed restrictions on off-leash and expanded leash required areas in the remaining one percent of the parks is an onerous burden to one of the largest historical and traditional users of the parks: Dogs and their owners.

By specifically targeting dogs and their owners/walkers, it violates the traditional use condition of the bequest of the land from the city to the park system.

The proposal also does not take into account the parks character as an urban recreation area that must reflect the existing users of the parks.

Further, the assumptions underlying the proposed restriction mis-characterize the facts and create the false finding that the existence dog walking within the parks is somehow in opposition to environmental goals. To the contrary, dog walkers are important eyes on the park and are vested in its protection as a natural resource.

Finally, the effect of restricting the 110,000 dogs from these areas will create an unsustainable burden on the city parks and lead to an exacerbation of behavioral problems for dogs within the city.

Thank you,

Jamie White

Correspondence ID: 2215 **Project:** 11759 **Document:** 38106

Received: Apr,15,2011 17:24:26

Correspondence Type: Web Form

Correspondence: The GGNRA Dog Management Proposal is restricting access to taxpaying citizens who own dogs for political reasons. Dogs are not destroying the natural environment - people are - people who ride horses, ride bikes, hike etc.

It is a crime that the GGNRA is using my dog owners' tax paying dollars to fund the resources who have put together the 2500 page plan. The leaders within the GGNRA should be elected by the people - today they are clearly in the back pockets of some wealthy citizens who ride horses and just do not

want dogs in their way

Dogs and Dogs Owners deserve equal access to the the trails and beaches in the Bay Area

Furthermore the only official who bothered to contact us was Jared Huffman - the others sent back "canned" letters and Nancy Pelosi's web site would not even let us contact her so she is clearly behind the Dog Management Plan.

The GGNRA should revise their plan - dog owners deserve the same access as all other citizens

Donna Bailey Mill Valley

Correspondence ID: 2216 **Project:** 11759 **Document:** 38106

Received: Apr,15,2011 23:07:53

Correspondence Type: Web Form

Correspondence: I believe the new rules the Park service is trying to implement are an attack on one demographic of individuals (dog owners), this attack is disguised behind the need to protect the environment of the parks and remove danger from dog bites/attacks.

If we were to look around at what causes natural degradation I would speculate as to say 99.99 percent is from humans, for example: Eucalyptus trees, roads (where animals are killed every day) going through the park, horses trampling endangered garter snakes (I have seen numerous trampled snakes), horses tearing up the landscape and leaving copious piles of dung, bikes tearing up trails and roads.

The danger from dog attacks/bites is certainly a possibility?never heard of anyone being killed by a dog in GGNRA. Anyway, if danger is an issue we need to eliminate everyone from going to GGNRA areas. Murders might be among park goers, bikes might hit and kill people, horses could trample someone, cars could and have killed people within park boundaries.

Why is this focus mostly on dog owners? I don't think blaming a few dogs for damages is a fair assessment of the problem and it looks more like an excuse to go after one type of park user in favor of another (horseback riders).

Thank you

William Bailey

Correspondence ID: 2217 **Project:** 11759 **Document:** 38106

Received: Apr,16,2011 09:31:09

Correspondence Type: Web Form

Correspondence: I think dogs should always be on a leash. I have had a St. Bernards run up to a group of children I was taking to have a picnic with one of the children being fearful of dogs after having been beaten. It was difficult for me to stop the dog and I picked the child up (with a bad back) to calm the child. I experienced a dog knocking my child off his swing in a public park and the dog owner yelling at me about the her dog getting hit with the swing. I have witness a dog standing on its back legs leaning on a young child with its front legs on the child's chest barking into the child's face. I have had large dogs jump on me and I have a bad back. I find that everyone in the public is considered a toy for the dog's entertainment without permission from ourselves to be that toy. Owners always say their dog is friendly, but do I need to be the object of their personal habits (the pet) fun time? I have seen children slide through dog poop in public parks and walk through poop on school grounds. A dog is a choice of one persons habit/hobby, and like smoking, why should others have to suffer second hand hassles? I have had dogs growing up, I have adopted stray dogs and found homes for them, and I baby sit friends dogs. But dog needs should not equal the needs of humans. They should be respected but not treated as equals. I just for once would like to walk on the beach and not have a wet sandy dog run up and jump on me or run across my blanket while I am eating. Please help!

Correspondence ID: 2218 **Project:** 11759 **Document:** 38106

Received: Apr,16,2011 12:16:38

Correspondence Type: Web Form

Correspondence: I live near ocean beach in San Francisco and would like to see dogs on leash so that the birds are not chased. Fort Funston is already a leash free area. I don't see why Ocean Beach should be leash free. Thank you.

Correspondence ID: 2219 **Project:** 11759 **Document:** 38106

Received: Apr,16,2011 12:59:48

Correspondence Type: Web Form

Correspondence: The proposal suggests that Crissy Field separate the family area and dog area by banning dogs from the beach located in front of the parking lot. When you visit Crissy Field today, the beach front at the parking lot is full of families and their dogs. Banning dogs from the area will also bann families from the area. This is unfair to our families who will be pushed

away from the bathrooms and be forced to lugg our family picnic supplies and strollers to a greater distance away from the parking lot. Banning dogs from the fore-beach area takes away from the purpose of the park as a city recreational space. This is unproductive and unfair.

Correspondence ID: 2220 **Project:** 11759 **Document:** 38106

Received: Apr,16,2011 14:56:10

Correspondence Type: Web Form

Correspondence: I will start my comment off by first declaring that I have not read the document and that whom ever is reading this will most likely realize that I work for GOGA. That being said I am obviously not commenting as a government employee.

I would like to make a suggestion as a previous dog owner and who happens to love dogs. I can understand the issues on both sides realizing that dog owners want an area where Fido can run without a leash. On the other hand I also understand that others who don't care for dogs don't want to have a dog running up to them for either affection or growling at them.

This suggestion may be in the plan but if not perhaps it will have an impact on a solution to keep all happy. Currently there is an area down in San Mateo off of Third Avenue that has a large fenced area for dogs. In this area, there are a couple of places that are shaded where owners can sit while there dogs run to their hearts content. Since this area is not territorial to any specific dog, I have never seen dogs fighting for "thier space". The place is fenced and dirt so there is no grass to tend. Since the area is agacent to a public trail that goes from SFO down to Redwood City, there are garbage cans available for owners to deposit their dogs droppings. "Fire Hydrents" are available for well doing what male dogs do. The place always seems to have a substantial amount of happy dogs running "free". I have even had people tell me that they drive quiet a distance just to go to this dog park.

I also remember seeing something similar while visiting the Seattle area. A parking area was established and from that point, you entered a paved "trail" that was fenced on both sides. It went quite a distance with portable "doggie stations" where their were bags, trash, and water for the dogs. At the end of the trail was a small beach that lead down to the water that had bouyes (sp?) floating to mark off the area from boats. I can't begin to tell you the amount of happy dogs that were enjoying the water as they swam out to fetch tennis balls. It was actually kind of a family get together of the whole area as the dogs played.

So just a couple of suggestions that may or may not be feasible. It seems with the amount of land that GOGA has perhaps something could be done to

appease dog owners without endangering current habitat or species but I'll leave that one to those who are more knowledgeable regarding the terrain of the park.

If you are interested and since I go to my mothers every weekend and go walk there, I would be more than happy to take pictures of the dog area if you'd like. You can email at the above address or well...you know where to find me at the office!

Correspondence ID: 2221 **Project:** 11759 **Document:** 38106
Received: Apr,16,2011 16:13:20
Correspondence Type: Web Form
Correspondence: This document proposes a way to protect native vegetation in national parks located in the SF area. For that reason, it should be supported.

Correspondence ID: 2222 **Project:** 11759 **Document:** 38106
Received: Apr,16,2011 18:10:49
Correspondence Type: Web Form
Correspondence: Dear Sirs and Madams,

Thank you for allowing public comment on the GGNRA dog plan. Since 1991 I have been living a few blocks from Ocean Beach (at Riviera) in San Francisco and have been walking the beach -- both long distances north and south several times each and every week. Having that recreational place to escape the busyness of the city is most welcoming to me as a human being.

Over those many years, I have seen the difficulties that the snowy plover have had to endure with each passing year, as well as the almost unbearable changes that the shore line has gone through during that period. Like you, I wish the snow plover would never be too tired to mate and that the shoreline never be dug up and never change. I think we as a society need to protect these treasures.

Yet, focusing on eliminating the canine population is nothing but a red herring. Yes, I have seen the occasional hound chasing shore birds from their standing positions, but that pales in comparison of the constant racing east and west that the birds endure from the incessant crashing of the waves. Similarly, time and again I have seen Rover dig holes in the sand and toss piles of sand to one side or the other. Yet, that disruption of the shoreline is but a speck of sand on the beach compared to the vicious and violent pounding that winter storm tides have done to the shoreline. Many times the shoreline is unrecognizable from one day to the next after a particularly

cruel tide.

Therefore, I suggest that we as a people and you as the guardians toss aside the red herring of Fido and stand up with some backbone and determination to finally ban the waves and the tides. That kind of moxie will really bring the change we desire for the snowy plover and the shore line -- and that of course is no change at all.

Now, some of you may say, "but Mr. Perry, the waves and the tides are natural". To that I say, "as natural as people and dogs".

Thank you.

Correspondence ID: 2223 **Project:** 11759 **Document:** 38106
Received: Apr,16,2011 18:25:04
Correspondence Type: Web Form
Correspondence: I support the preferred alternative recommended by NPS. I also support strictly enforcing the rules once they are adopted. I am not opposed to dogs but I don't like off leash dogs near me and my children and I don't feel I should have to accept it. Dogs should always be on leashes and not under voice control and they should have their own areas.

Correspondence ID: 2224 **Project:** 11759 **Document:** 38106
Received: Apr,16,2011 20:09:25
Correspondence Type: Web Form
Correspondence: I favorably endorse alternative 9C for Ft.Mason park. This presents a moderate alternative to the current fully restricted plan. It also reserves specific areas for on-leash only, preserving these areas for those individuals that prefer a controlled environment.

Dog owners that disregard dog cleanup rules (waste pickup) should be subject to citation.

I read the notice posted in the park to find this website.

Correspondence ID: 2225 **Project:** 11759 **Document:** 38106
Received: Apr,17,2011 07:32:59
Correspondence Type: Web Form
Correspondence: Plan C provides the best protection for all users in the park. It resolves the legal contradictions for private and commercial dog walkers. It creates areas

for the wildlife and people who are overwhelmed by dogs. It is cost-effective in terms of enforcement and site preservation.

Correspondence ID: 2226 **Project:** 11759 **Document:** 38106
Received: Apr,17,2011 09:48:34
Correspondence Type: Web Form
Correspondence: A dog in the GGNRA should be on a leash. especially because this National Park is in such an urban area.

Every dog walker says: "Oh, don't worry. My dog never bites," but every year there are dozens of reported dog bites in the Park. I don't want to have to trust that a stranger's dog is friendly! And forget getting bitten, I don't even want a stranger's dog even jumping up on me! I don't want a stranger's dog barreling at me at full speed!

And when I have my kids with me in the park, it's always a scary moment when I see a stranger's dog run at them. I really don't get the issue here. Putting a leash on a dog in the park is not too much to ask!

Correspondence ID: 2227 **Project:** 11759 **Document:** 38106
Received: Apr,17,2011 10:21:47
Correspondence Type: Web Form
Correspondence: I want to start by saying that I believe in responsible dog ownership, and hope that a few people who aren't following the rules aren't going to mean that leash areas for those who are responsible are restricted.

I have owned a Beagle, Nora, for 5 years, and live in Pacifica. Since San Mateo County parks prohibit dogs, we go to Fort Funston frequently. I tend to use this time as my exercise time as well, and often hike for 2+ hours.

The time Nora has there is the high point of our week. She is able to run freely and play unrestricted -- something that gives us both great joy. Limiting the off leash areas at Ft Funston as radically as is proposed seems draconian and unnecessary. I would like to see Mori Point stay available for on leash walking as well.

Please don't take these recreational outlets away. I'm in an office all week and these outlets are good for our mental and physical health.

thank you.

Correspondence ID: 2228 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,17,2011 12:58:21

Correspondence Type: Web Form

Type:

Correspondence: I certainly hope that the GGNRA keeps open the only few beaches that currently exist for dogs and their walkers/families. IF a dog is aggressive, then I hope the owner has the common sense and sense of responsibility to put their dog on a leash. If a dog is gentle and not aggressive - and can obey under voice command (such as mine and many others I know) - then they should be allowed to walk off-leash....and, AT THE VERY LEAST, walk with a leash. PLEASE, PLEASE CONSIDER NOT BEING SO BLACK AND WHITE!!

Correspondence ID: 2229 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,17,2011 13:23:36

Correspondence Type: Web Form

Type:

Correspondence: As a native San Franciscan (50 years), I feel that this "debate" has gone on far too long. Animals and humans must share the limited space and resources available to us in this community.

Most people consider their "pets" family members, as much as their human family members. Most people are responsible parents for both their children and animals. Unfortunately, there are still many, many dog guardians who are not as responsible as they should be -picking up their poop, and managing their dogs in a respectful way when it comes to others who do not share the same adoration for canines. I would suggest these same people are irresponsible in other areas of their lives as well.

Rather than spend so much \$ to enforce and create the amended off leash areas, why not educate and ensure that people have well trained dogs? For dogs to be off leash anywhere at any time, they should have a rocket recall. If you call them, they will come away or off of something ie. people, picnics, flora and fauna and back to you.

In addition to a dog license, dogs can be issued a tag which indicates that have passed a Canine Good Citizen test, which means the dog/human have been trained/passed a number of tests to ensure appropriate behavior in public. This would make for better managed, happier dogs and a happier community.

Most young and adult dogs need off leash play with each other to burn off there excessive energy, and maintain overall well-being, which will be a preventative for more serious behavior problems. Sadly our city parks located in such densely populated areas with merchants and traffic, do not

allow for safe off leash activity.

Why can't we all just get along?

Correspondence ID: 2230 **Project:** 11759 **Document:** 38106
Received: Apr,17,2011 15:17:58
Correspondence Type: Web Form
Correspondence: Frank Dean General Superintendent GGNRA Fort Mason, Bldg 201 San Francisco CA 94123

Re: GGNRA DEIS Dog Plan

Dear Superintendent, I am requesting that the GGNRA adopt the 1979 Pet Policy to control off-leash dog walking on Ocean Beach, Fort Funston, and Crissy Field because it is more balanced, longstanding, supports recreation, collaboration and shared use.

I started walking my first dog on Crissy Field in 1974 as a boy. During those days the beach from the St. Francis Yacht club to the bridge was a very different place and rarely visited. It is a valuable open place where local citizens go to walk, meet each other, exercise and play with their pets. Over the years and with the investment of private citizens and the takeover by the US Park Service, the Crissy Field beach area has improved. These improvements including better parking, restroom facilities, pathways, etc. attract a wide range of visitors on nice weekends. We all share this place today in a peaceful manner. The GGNRA's proposed dog plan targets citizens of San Francisco and dog owners to give up their long standing rights and those of future young boys and girls unfairly while doing nothing to restrict the potential damage caused by the increase in visitors i.e. runners, walkers, kite flyers, surfers, and bikers.

Today I walk my current dogs on the same beach every morning and often in the afternoon as well. During the week few visitors walk the beach. I don't understand why the GGNRA is considering such a blanket proposal to eliminate off-leash dog walking, especially during these times. The DEIS indicates the policy is needed because dogs might or could cause a negative impact to the areas they currently visit. There is no scientific fact to these claims. As a daily visitor to the park I see far more egregious acts against the environment performed by humans that negatively impact the enjoyment these areas seek to provide us all.

I also oppose the GGNRA's proposed Compliance-Based Management Strategy which will change the status of off-leash areas to on-leash or no dogs without a chance for me to comment. This is unprecedented and just

un-American. A sneaky trick that indicates GGNRA policy is being driven by an unfair, no dog agenda. It makes me concerned that my voice and this comment letter will be tossed aside and not fairly considered by your office.

The GGNRA policy needs to be very clear, fair and balanced between dog owners, runners, walkers, kite flyers, surfers, and bikers who have peacefully coexisted for many years before the GGNRA and your office existed. Please reconsider your preferred alternative and adopt the 1979 Pet Policy.

Thank you for your prompt attention to this matter. Please contact me for further questions.

Sincerely,

Curtice Smith

Correspondence ID: 2231 **Project:** 11759 **Document:** 38106

Received: Apr,17,2011 15:33:10

Correspondence Type: Web Form

Correspondence: I would like to disagree with the proposed restrictions on dogs in GGNRA's Crissy Field. We humans are very good at advocating for our human species while consistently giving the short stick to the animals who don't have a voice. We need to take into account that animals, unlike plants, have feelings, emotions and highly intelligent thoughts just like humans do. In the case of San Francisco dwelling dogs their time spent on walks like at Crissy Field are typically the highlights of their short lives. Animals are also voiceless and don't get a vote at the ballot box or a chance to express their comments on the Internet. Therefore, it is the duty of us humans to act as impartial advocates for all animals on the planet and to put ourselves in their shoes, not to just serve the interests of humans.

Dogs are meant to run and love to do so, like fetching a ball. Our San Francisco dogs are on a leash or left couped up indoors within the vast majority of the city's houses and streets that are dedicated for the benefit of humans. The infrequent times dogs get to run around are when they get taken to a park such as Crissy Field. It is a really special time for them and you can see it from their faces.

The argument is made that dogs violate the areas which are dedicated to endangered plants. However, those plant areas are fenced off and in my years of visiting Crissy Field I don't recall seeing dogs violating the fenced areas. If this is a problem then can't we solve it by reinforcing the fences?

In summary, the benefit for dogs is so great and given we should advocate for the voiceless, in this case I feel we shouldn't further restrict dogs movement and instead reinforce the fences protecting the native plant areas.

I believe I am an impartial voice as I don't have a dog and neither do my friends and family. I don't belong to or participate with any dog or pet organization.

Correspondence ID: 2232 **Project:** 11759 **Document:** 38106

Received: Apr,17,2011 15:47:55

Correspondence Type: Web Form

Correspondence: I am totally opposed to the restrictions on dogs outlined in this plan and strongly believe that the status quo should be maintained. There are plenty of places that the minority of people who do not like dogs can go. Options for dogs to run off-leash are limited as it is. Virtually all dogs that frequent these areas are well-behaved and their enjoyment should not be curtailed or eliminated just because of a few poorly behaved dogs.

If the Park Service feels that something must be done to address the problem of the few poorly behaved dogs in these parks, instead of closing these areas to dogs, a better approach would be more enforcement to minimize the occurrence of inappropriate behavior. Perhaps volunteers from area dog groups could be trained to help patrol areas to deal with the infrequent irresponsible dog owners.

Requiring dogs be on leash in the areas where they currently can run free is just not acceptable. Consider for a moment what life is like on the other end of the leash -- not many folks would enjoy the pull of a collar around their neck and neither do our canine companions. Dogs bring such joy to so many people -- and their therapeutic value is well documented -- and deserve a place to run free. Personally, I would be most affected by the closure of the off-leash areas in the Marin Headlands, Fort Funston, and Crissy Field, but think all off-leash areas should remain so. Crissy Field already has a large area where dogs are prohibited most of the year. If a compromise is necessary, perhaps extend that restriction year-round, but continue to allow dogs in the existing dog-friendly areas.

The dog-friendly nature of these parks is a huge part of the attraction of this area to me and so many other dog-owners. Please do not deprive us of the simple pleasure of walking with our dogs off-leash in these beautiful parks.

Thank you for considering these comments.

Gail Arnold

Correspondence ID: 2233 **Project:** 11759 **Document:** 38106

Received: Apr,17,2011 21:08:36

Correspondence Type: Web Form

Correspondence: Dogs are an exotic species and are harmful to wildlife. Whenever two parties are in conflict, we need to support the weaker party. In this case, that is the wildlife. The wildlife MUST be given top priority, because they can't protect themselves from us (or from our pets). Dogs and other exotic species do not belong in our parks and other wildlife habitat. At a minimum, they should always be on a short 6 foot leash. But it is preferable to ban them from our national parks.

Correspondence ID: 2234 **Project:** 11759 **Document:** 38106

Received: Apr,18,2011 14:43:29

Correspondence Type: Web Form

Correspondence: Dog ownership is an important facet to many Californian's lives, and has been shown to benefit health and happiness in dog owners. As residents of San Mateo County, we have enjoyed Fort Funston with our dog for many years.

I support continuance of the current conditions at Fort Funston. I think it is hard to argue that dogs have a more negative impact on the environment than do hanggliders, people drinking at the park after hours (as evidenced by broken bottles in and around the parking lot) and horses. Specific to the last point, the amount of visible dog feces on the beach pales in comparison to the amount of horse feces on any given weekend. I would also imagine that Horse trails in an among the bluffs contribute far more to shoreline erosion than any combined dog use.

I am supportive of encouraging more responsible dog ownership. I think that warnings/fines for not picking up after one's dog would achieve this purpose. I am also supportive of licensing professional dog walkers (but I think that limiting the number of dogs they are able to bring into the park is unnecessary).

Thank you for hearing my feedback.

Correspondence ID: 2235 **Project:** 11759 **Document:** 38106

Received: Apr,18,2011 18:44:24

Correspondence Type: Web Form

Correspondence: Re: Map 10-Crissy Field. It is my fervent wish to support Alternative A - that map which continues to allow maximum access to beachfront off-leash activity, especially continued use of East Beach. We have attended GGNRA meetings and this plan - alternative A - seems the most widely accepted. We venture at least twice a week from Oakland to Crissy Field to enjoy the time with our golden retriever - nowhere in the Bay Area does she have the safe opportunity to run free on the beach, swim in clean, well-managed safe water, while we further enjoy our national park, regularly frequenting the Warming Hut, and Beach Hut. The exercise is superb for the three of us; we thoroughly enjoy spending our time (and money) in our national park. We joined Crissy Field Dog Group in order to support our favorite area. Our dog even has 8 pages in the recent publication, "San Francisco Dogs" submitted because of our love for Crissy Field.

Curtailing access in any other fashion would severely impact not only our health and well-being, but it would force more dogs to smaller, more confined places, hence posing serious dog health risks.

I implore you to maintain as much off-leash, beach access open space in all relevant GGNR areas. Thank you.

Correspondence ID: 2236 **Project:** 11759 **Document:** 38106

Received: Apr,18,2011 20:55:35

Correspondence Type: Web Form

Correspondence: As I understand that compromise is always important, there are parts where compromise to the extent being requested by dog lovers is not an option. Every park needs to have areas where dogs can run free, but certain landscapes and their native animals and flora cannot withstand animals - 2-legged or 4-legged to run wild. This is why in countless parks like Muir Woods Nat'l Monument boardwalks have been constructed to limit our footprint. These extremely sensitive areas need to be identified and protected. And the more used and less sensitive areas can remain open to dogs. Respect for those who are afraid of dogs or who enjoy the peace of our parks without dogs is also essential. Thank you Gary Weiss

Correspondence ID: 2237 **Project:** 11759 **Document:** 38106

Received: Apr,18,2011 21:29:13

Correspondence Type: Web Form

Correspondence: I am a dog owner and believe the park service's number one priority is to protect the habitat of the parks for the wildlife. As such, I think dog's should be on leash in these areas. The few times I have brought my dog to Fort Funston, I witnessed off leash dogs out of control. Many of them ran out of

sight of their owners and were destructive to the habitat and wildlife. Few owners picked up their dogs poop and there was dog shit everywhere. With so many off leash dogs, aggression among dogs occurred frequently and owners became argumentative and hostile too. I've always kept my dog on leash each time I've visited but after two visits I stopped the visitations. The wildlife in these areas have no chance against so many dogs. I think this initiative is long overdue. Dogs should be on leash and any off leash area should be severely restricted and fenced to minimize habitat destruction.

Correspondence ID: 2238 **Project:** 11759 **Document:** 38106

Received: Apr,18,2011 22:51:26

Correspondence Type: Web Form

Correspondence: Professional dog walking in the GGNRA should be either banned or drastically limited.

---- You Should Not Be Able To Make Money Consuming National Park Resources ----

...and if you're bringing a pack of dogs into the park to root around, poop, and tear the place up then you are consuming park resources, plain and simple. I see it all the time: Professional dog walkers bring in these huge packs of dogs, sometimes 10 or more dogs running around, and dogs in general have a huge impact on the parklands, but magnify that impact by 10x, only with 1/10th of the supervision per dog and you get an idea of how much those professional dog walking services tear things apart.

Correspondence ID: 2239 **Project:** 11759 **Document:** 38106

Received: Apr,18,2011 23:03:06

Correspondence Type: Web Form

Correspondence: This is to request that you please consider expanding the areas in the proposed plan where dogs are allowed off leash under voice control. In particular Muir Beach, Oakwood Valley and Cronkite Beach.

For many years I have enjoyed these areas (and others included in your plan) without a dog...and once or twice in all those years of hiking and beach going I was annoyed by an inconsiderate owner who allowed his/her dogs to bark continuously or more often who failed to clean up after his/her pet.

From what I have been able to observe - for the most part - the dog owners take care that their dog does not bother others - also for the most part, the dogs are not interested in other people - more interested in other dogs or

their balls or just the joy of running.

What having all dogs leashed does is takes away the joyfulness in bringing one's pet to a beach or a natural area (where endangering wild life is not an issue)

This joyful abandon is the reason you see so many pictures of dogs running free - the sight of a dog racing along freely resonates with us in some way that is hard to explain - but there is no denying it does.

Where there is an environmental issue (eg the breeding site of snowy plovers) - of course a leash law needs to be enforced during the nesting season

But where the issue is something else - perhaps the solutions can be less restrictive - eg required dog etiquette classes for owners against whom there is a complaint and a simple dog obedience test with the licencing process, and/or certain days of the week or hours of the day when dogs can be allowed to run free (under voice control)

I thank you in advance for your consideration.

Linda

Correspondence ID: 2240 **Project:** 11759 **Document:** 38106
Received: Apr,18,2011 00:00:00
Correspondence Type: Web Form
Correspondence: To whom it may concern:

I am writing to urge necessarily strict dog control rules and enforcement. Although I admire and appreciate dogs as pets, I believe most people who seriously consider the issue would agree that dogs do not belong everywhere. Of course dogs enjoy running, but in the GGNRA unsupervised dogs take a toll on native bird, wildlife, and plant populations through harassment, flushing, and soil disturbances as well as direct killing. I'm reminded of the saying, "Your right to swing your fist ends where my chin begins." In this case the chin belongs to the sensitive native ecosystems of these parklands, and it's a part of the GGNRA's mission to protect them.

While native habitat and population decline is felt in the medium- or long-term, off-leash dogs create other problems which are felt immediately. Dogs under voice command spend much of their time out of direct site from their owners, creating an uncomfortable or even frightening experience for the park user who happens upon a dog that appears to be--and may actually be--

uncontrolled. Also as a result of poorer supervision, when leashless dogs leave droppings they are less likely to be removed. When people visit the GGNRA, that's not the kind of nature they're looking for.

Furthermore, dogs and their owners have abundant access to designated dog parks, where dogs can run free off-leash without causing these negative externalities.

For the sake of vulnerable native wildlife, birds, and plants, I urge the GGNRA to, at minimum, require and enforce on-leash rules for some sites and exclude non-service dogs from the more sensitive areas.

Sincerely,

Naomi Sorbet

Correspondence ID: 2241 **Project:** 11759 **Document:** 38106
Received: Apr,19,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Park Service,

As the GGNRA new dog policy plan gets more widely publicized, there are several things that I am concerned about.

1. people who are against off leash dog access often suggest that we keep our dogs in our backyards. But a huge issue here is that the GGNRA lands ARE the back yard for many of us who live in apartments or houses with yards the size of a suburban bedroom. Sure, if I had lots of land, I would happily exercise my dog there, but I don't. And my dog would not be well socialized if she never met another dog.

2. I am self employed, so my primary socialization happens at the dog park, where I have met some of my best friends and even made some business connections. I don't belong to a church or go to bars to try to meet people, so this is it for me. My social life will be curtailed if my dog can only be on leash, since it will largely eliminate those social circles that form around happy playing dogs. You just don't strike up a conversation of any length if your dog is on leash because you are having to focus on keeping moving. I feel that my life beyond my dog is going to be penalized if this policy passes.

Correspondence ID: 2242 **Project:** 11759 **Document:** 38106
Received: Apr,19,2011 09:48:34

Correspondence Web Form

Type:

Correspondence: I am very concerned about the punitive measures proposed for non-compliance if the GGNRA dog policy passes. Canvassing people at Fort Funston and Crissy Field, it appears that 60 to 70% have either never heard about the proposed policy or have only a vague idea what it is about. The Park Service would need to do a huge outreach and education process and post many many signs in GGNRA lands to ensure that everyone is aware of the new rules. Otherwise it would appear that the GGNRA has set everyone up for failure. If the 25% of us who are aware of the new rules are the only ones who know the punishment for non-compliance, then punitive measures will assuredly be leveled against us anyway. This is grossly unfair and undemocratic.

thank you Judith

Correspondence ID: 2243 **Project:** 11759 **Document:** 38106

Received: Apr,19,2011 10:31:39

Correspondence Type: Web Form

Correspondence: I support the Dog Management Plan. The natural and scenic resources of the GGNRA should be maintained for all visitors; dog owners should not be given more than their fair share.

Correspondence ID: 2244 **Project:** 11759 **Document:** 38106

Received: Apr,19,2011 13:36:55

Correspondence Type: Web Form

Correspondence: I object to all currently proposed (new) restrictions prohibiting off-leash dog running at Fort Funston and all GGNRA properties within the Pacifica city limits. There are already too few areas in the San Francisco Peninsula where off-leash dog use is allowed, and the new restrictions under consideration are far too excessive.

At Fort Funston, the largest area proposed for off-leash use is on the beach, which is simply the least accessible area to use given high tides and poor weather conditions.

Correspondence ID: 2245 **Project:** 11759 **Document:** 38106

Received: Apr,19,2011 14:00:51

Correspondence Type: Web Form

Correspondence: Dear Sir or Madam,

The proposal to restrict dogs from running free (under voice command only) is outrageous! There are only a small number of open space areas where dogs are able to run free as it is. Dogs need to be socialized. Dogs need to be in a safe environment with their guardians. Dogs are restricted from almost every aspect of public life in the United States and this proposal would restrict them further. It has been proven that living with animals improves physical, mental and emotional health. Why must we punish them by not allowing them the space they require for their own mental, physical and emotional health?

Restricting dogs at Fort Funston into an unreasonably small area will create social tensions, not only among dogs, but among their guardians. Visiting Fort Funston, and watching as well as experiencing free roaming dogs adds to the education of children and anyone afraid of animals.

If this proposal passes, San Francisco would lose yet another claim to "progressive" thinking and living. LEAVE FORT FUNSTON FOR HUMAN RUNNERS AS WELL AS DOG RUNNERS! NO LEASH!

Correspondence ID: 2246 **Project:** 11759 **Document:** 38106

Received: Apr,19,2011 15:24:04

Correspondence Type: Web Form

Correspondence: The GGNRA's proposal is a step backwards for animal welfare in the Bay Area. The Draft Dog Management Plan are overly-restrictive and represent a major departure from the current, balanced use of the park.

Currently, off-lead activity is restricted to less than 1% of the park's land. This proposal would drastically reduce the land available for off-lead recreation. The plan is difficult enough in San Francisco and Marin counties, where beloved areas like Fort Funston and Muir Beach will be restricted or off-limits to off-lead dogs. Worse, the plan leaves San Mateo with no GGNRA land that permits off-leash use.

Please revise your proposal as the current draft does not benefit the community.

Correspondence ID: 2247 **Project:** 11759 **Document:** 38106

Received: Apr,19,2011 17:15:02

Correspondence Type: Web Form

Correspondence: I applaud the National Park Service for coming up with a reasonable plan that will provide dog owners some access to the GGNRA while at the same

time providing a sensible level of protection for the flora, the fauna, and persons without dogs.

You have my full support.

Correspondence ID: 2248 **Project:** 11759 **Document:** 38106
Received: Apr,19,2011 19:10:42
Correspondence Type: Web Form
Correspondence: Dear Park, I need to express my deep belief that you must provide off leash space on Ocean Beach for our wonderful canines. I actually moved into a house expressly so that my new dog could enjoy your lovely beach - then, it was all still city land - and the stipulation was that this land was for the recreation of all citizens. I have been to Ocean Beach nearly every day for the past 20 years. I did not own a dog then, but one of my early joys was watching these magnificent beasts romp and run to their heart's content. I have had two retrievers since, and both have loved their beach experience. These dogs need running areas - and as an owner, I am responsible for their "wild" life. Just as you are of yours - I too love the birds, the seals, and other marine life - all sacred and needing protection. I do believe that your singling out and making the western snowy plover the game changer was a grave error. This Park is not a traditional Park - we are an urban entity, and the rules have to be interpreted differently. Drawing the line with the snowy plover does not make sense - in addition, Ocean Beach is a notoriously harsh environment, especially for this endangered species. High winds, racoons, feral cats, raptors, and even horses make this area inappropriate for these birds - they can better thrive elsewhere. I was told the last count of snowy plovers was 16 - this number tells the story: you need to turn your resources and protective directives to better targets. Turning to another perspective, I have seen only a handful of dog "problems" in all my 20 years on the beach. There just are not that many people on the beach - it is vitrually empty most nights (I walk at around sunset), and there are not that many dogs. We do not have a problem as the great majority of dog owners are caring and responsible - we take our beach seriously, and that goes for the dogs too. The magnifent wildness of our dogs needs to be honored and treated as a natural resource - for all our enhancement. Peter Munks

Correspondence ID: 2249 **Project:** 11759 **Document:** 38106
Received: Apr,19,2011 19:39:29
Correspondence Type: Web Form
Correspondence: As the NPS has extended the comment period, I wanted to express my enthusiastic support of the plan to restrict off-leash dogs in the GGNRA. Many Bay Area dog organizations have "fact and fiction" lists on their

websites, presenting the proposed Dog Management Plan as "fiction" and their views as "fact". One example from a Marin dog blog stated that dogs flushing birds from cover is harmless. During the breeding season, flighted adult birds may indeed flee a pursuing canine, leaving their eggs, nestlings, or fledgling young to die. The dog may emerge from cover quickly, leaving no obvious feathers behind, however, this "harmless romp", this beautiful "expression of instincts" can cause serious damage to the avian population. Fewer young will survive to reproductive age. Loss of the coastal avian population is a far greater wrong than the sensible request that people leash their dogs

To reach the off-leash enthusiasts, the NPS may wish to emphasize the potential harm that off-leash dogs can cause to other dogs, both running free and responsibly restrained. In a dog park, a dog owner (and small, shy, or submissive dogs) can easily see which dogs are in the area and new dogs as they enter. In the vastness of the GGNRA, an aggressive, off-leash dog can easily surprise (or be surprised by) another off-leash dog or a human and leashed dog team. A leashed dog (and the accompanying human) is at a terrible disadvantage in this situation, as are small or very submissive off-leash dogs. I've personally observed many off-leash dogs running 20 feet in front of their owners (or behind, or off in the bushes). An aggressive off-leash dog, running out of sight of his owner, can also seriously injure a person. The GGNRA is home to the tricky creature that should strike fear in every off-leash enthusiasts' heart: the wily, and wild, coyote.

As a great appreciator of our urban treasure, the GGNRA, I beg the NPS to implement this very sensible Dog Management Plan. The health and safety of Bay Area dogs depends upon it. Do it for the dogs! (And for the birds, small mammals, coyotes, marine mammals, flowers, vegetation, and, lest we forget, the people who visit the GGNRA to experience its precious splendor -- which will disappear without proper management. We're counting on you!)

Correspondence ID: 2250 **Project:** 11759 **Document:** 38106

Received: Apr,20,2011 01:18:54

Correspondence Type: Web Form

Correspondence: I think the idea of holding dog owners accountable for their actions is a good one. We all know that dog owners have not been following the rules (they even boast about it) and have been making non-dog owners suffer for decades for their selfish actions. If they do not abide by the leash rules, it is reasonable to not allow dogs. However, the percent compliance is way too low. It should be 95% compliance. There should also be a mechanism for lay people to report dogs off leash as there are not always rangers around. In fact, I was surprised when I described a particular area that has a lot of dog

incidents and fights between humans over dogs that the rangers were not aware of how severe the problem is and even more surprised that the stats did not reflect the problems.

Correspondence ID: 2251 **Project:** 11759 **Document:** 38106

Received:

Apr,20,2011 04:27:32

Correspondence Type:

Web Form

Correspondence:

In order to share space with other visitors, dog owners need to put their dogs on leash at all times in all places that allow dogs. When dogs are off leash, the space becomes a "special use area." Therefore, there should be no off leash dog areas. If the GGNRA wishes to have some space for off leash recreation, then there should be other special use areas also created to be fair. For example, there should be a handglider area designated with signs. I have heard from handgliders that they need an area for take-offs that is free from dog poo and also from dogs. After talking with them it is only dogs that cause problems for their activity so making this area dog free will allow for their recreation. Runners also need special trails designated for running or walking. After talking to runners, dogs also pose a problem in their recreation. Off leash dogs or dogs on long leashes often get in their way while running and cause them to stop or slow down to avoid the dogs. Others have reported bites and/or nips. There is no comparable problem other than dogs for runners. Keeping dogs on short leashes in runner and walker areas should be sufficient. However, no dogs would be ideal. Bird watchers also need designated bird watching areas. Dogs are again the biggest problem as their barking gets in the way of bird watching. Banning dogs from designated bird watching areas would be ideal. This area could also be a quiet zone. (i.e. no loud talking). This area could be combined with a yoga area or other recreations that require a peaceful surrounding. This would mean that this special use area could not have dogs in order to maintain the peace of the area. Bikers have a similar problem to runners in that dogs run in front of them. The bikers I have talked are road bikers so this is not as big of an issue. However, I imagine mountain bikers in marin and other places have issues with dogs. There should be mountain biking trails. Others enjoy skateboarding. This activity could happen in a limited area of the GGNRA that is dog free. Park preservation and planting native species is another popular activity. This activity should definitely be in a dog free area or at least dog on leash area as dogs tend to dig up and trample plants. It doesn't seem fair for someone's work to be ruined by another's recreation preference. Painting/drawing is another recreation. As long as dogs do not approach the painter/artist, this activity could occur with dogs off leash. Any sports that occur in the GGNRA should also have a designated area that is dog free. For example a space for soccer, volleyball etc could be designated by the beach or bay. Dogs get excited by people running around and try to place with people thus disrupting people and

driving them away from the park. These areas should be dog on leash. Surfing is another popular activity that is disrupted by dogs in the water. In surfing areas, no dogs off leash in the water should be allowed. Horseback riding is another recreation that occurs in certain areas of the GGNRA. Dogs often approach and agitate horses which is a safety problem. Again dogs are the major reported problem by horseback riders. These areas also require dog free or on leash dogs. I'm sure there are many other forms of recreation that take place in the GGNRA that I am not aware of and anything that I have missed should also be considered.

I think it is ok to share the space and not create various special use areas, but this would require dogs to be on leash and no dogs off leash anywhere. If special use areas are created/continued, it would not be fair to just create a special use dog area. Furthermore, all special use areas should be regulated. One idea is to have permits to use any of these special use areas. They could be very very low cost (so as to not exclude people based on finances) either yearly, monthly or day permits. I would suggest 20 dollar yearly, 10 dollar monthly and 5 dollar daily permits. You could also be eligible for a free yearly pass if you are over the age of 65, under age 13, disabled or earn below the poverty line. These special use areas should be not affect recreation in the surrounding areas. These should of course be rules for each special use area and fines for breaking the rules in a particular area.

Correspondence ID: 2252 **Project:** 11759 **Document:** 38106

Received: Apr,20,2011 12:06:36

Correspondence Type: Web Form

Correspondence: I am happy the park service wants to regulate the activity of dogs in our parks. Dogs are a joy, and deserve exercise outdoors. However, the proposed plan does not yet strike a sustainable balance between dog's activities and the needs of wildlife, habitat, and other people.

1. Walking through parks in the Bay Area, I find there is almost nowhere to go that is not open to dogs. There ought to be at least a few places where people and other animals can enjoy the parks without dogs.

2. The tolerance for non-compliance of off-leash activities is FAR too low. Every single time I go out in our parks, I see them overrun with off-leash dogs, running directly under signs that say dogs should be on-leash. In general, I think the signage is good. It's just that no one enforces it. When one person lets his dog off-leash, other people want to, also. It's a spiral. The plan should strive for 95% compliance. There should be friendly tickets, and perhaps even warnings, or people around to verbally re-inforce the signage.

3. Off-leash areas should be well-marked to separate them from other areas.

People can be directed toward them when they're found running their dogs off-leash in on-leash areas. Fences around off-leash areas are desirable when they make ecological sense.

4. Commercial dog-walkers should not be allowed in the GGNRA. If they are, they should have a one-strike rule: if they're found letting their dogs off-leash in on-leash areas, they should be banned from the park.

Dogs have plenty of places where they can happily play outdoors in San Francisco. To let them run off-leash in sensitive areas does no one any good. It harms threatened species and native wildlife and plants.

I would hate, for example, to see the Snowy Plover go extinct because dog owners were simply not guided to play with their dogs in safer areas. And yet, this is the direction we are going.

Please consider adjusting your plan in such a way as to keep all the creatures who flourish in our parks content. We don't want to ruin some species forever, just for an extra-fun game of fetch.

Thank you.

Correspondence ID: 2253 **Project:** 11759 **Document:** 38106
Received: Apr,20,2011 12:38:25
Correspondence Type: Web Form
Correspondence: We need more off leash territories in the city of San Francisco. Eliminating natural space for dogs to run around grass and sand, beach and trees will only lead to more dogs being off-leash in areas that concerned parties feel are safe as they are legally only on-leash. It is unreasonable to assume owners will drive 30-40 minutes to areas outside the city for dogs to roam daily, and it is also inhumane to expect dogs to be onleash at all times outside the home, excepting within muddy, sandy small dogpark enclosures. Rather chase dogowners who have untrained dogs, or don't clean up after them with hefty fines. But locking up dogs is not the answer.

Correspondence ID: 2254 **Project:** 11759 **Document:** 38106
Received: Apr,20,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Mr. Frank Dean General Superintendent, GGNRA, Blg 201 Fort Mason, SF CA 94123-0022

Dear Mr. Dean,

I am commenting today on the Dog Management in GGNRA as a member of the Conservation Committee of the 807 member Napa-Solano Audubon Society.

In general we agree with the National Park Service Preferred Alternatives, but we feel that there should be NO area in the National Park that dogs should be allowed to go off leash to protect wildlife, people, and the dogs themselves. We are sorry to take such a tough stance on this, but wildlife, especially those rare and endangered species are in your charter to protect. Dogs and cats have an excellent sense of smell and can find and disturb nesting birds and loafing animals. It is very unfortunate that these pets have been surrogate children for a lot of adults. They care more about them than anyone (wildlife, other people and other dogs). It is very understandable why they want their dog (who can do no harm) to go unleashed. But a responsible dog owner should take their dogs to a place where they are allowed to roam unleashed, not a National Park where they are not allowed Nationwide.

Perhaps an analogy might work in this case. How many humans would feel comfortable with a lion and/or tiger walking around unleashed? Probably NOT. Well, wildlife, certain visitors to the GGNRA, and certain dogs would most likely not feel comfortable with dogs roaming unleashed.

How your preferred alternative will be administered and enforced is another matter.

Sincerely,

Robin L. C. Leong Member of the Napa-Solano Audubon Society
Conservation Committee.

Correspondence ID: 2255 **Project:** 11759 **Document:** 38106

Received: Apr,20,2011 18:08:23

Correspondence Type: Web Form

Correspondence: I have read the entire document as provided in the S.F. Chronicle and find it a fair approach to the problem. It should be noted that the ON leash areas (specifically Golden Gate Park) are usually ignored, so it is not entirely true that OFF leash areas are going to be so limited with the new plan. There are so many more natural areas that include plants, wildlife/birds than there are dogs to have recreation. I totally understand the point of view of dog owners who want as much freedom for them as we have, but it is not reasonable

considering all that we need to put in the mix.

A good comparison is the part of the plan that keeps dogs off of Ocean Beach when birds need it for nesting and not the rest of the year---sharing fairly.

Correspondence ID: 2256 **Project:** 11759 **Document:** 38106

Received: Apr,21,2011 01:37:33

Correspondence Type: Web Form

Correspondence: At best, this dog management plan is a bad solution looking for a non-existent problem. At worst it is a blatant, illegal power/land grab (pronounced "Compliance-Based Management") based on weak, shoddy science and the hope that no one will notice until it's too late.

As a Bay Area parent I first brought our son to Fort Funston when he was four years old, to meet and play with off-leash dogs belonging to the nicest, most diverse and conscientious group of people you could ever meet.

We have since joined one-third or so of San Francisco residents in adopting a dog of our own, and walk him there regularly, off-leash, without incident. It provides much needed exercise for the dog, a chance for us to do something as a family, and a great opportunity to meet and interact with a wonderfully varied community of both dog-owners AND non-dog-owners, who coexist and thrive there in peace.

Suddenly, along comes this plan, complete with a 2300+ page impact study (which has already been publicly ripped to shreds--fortunately you can't throw a stick in the Bay Area without hitting a scientist). Forgive my German, but the whole thing smells like dogsh#. And I should know, I responsibly pick it up every day.

Bottom line, restricting recreational access for people with dogs is a fundamental violation of the reason the GGNRA was created in the first place: "the maintenance of needed recreational open space." Off-leash dog walking has long been on the activity list in these areas, and pre-dates the GGNRA. Let's not forget this is "recreational area," not a national park. This would seriously hurt over 1/3 of our population, even more if you count all the non-dog folks who would be negatively affected.

And let's just call the "Compliance-Based Management" strategy what it really is: a sneaky, subversive poison pill that would allow off-leash shutdowns without further public process, dressed up in formal-sounding jargon. Lipstick on a Basset Hound.

In summary, Bad Plan + Bad Science = Bad for San Francisco. If anything, we need MORE off-leash areas, not fewer. Plan "A+" for me, thanks.

Correspondence ID: 2257 **Project:** 11759 **Document:** 38106
Received: Apr,21,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I was knocked down in a park limiting dog use to "on lease". I was clipped from the back and knocked down by 2 dogs running off lease. This broke my knee. My doctor said this was a common injury from "herding dogs behavior". I do not know if any doctors have submitted evidence but any orthopedic doctor is familiar with this break and it's causes. I was defenseless as they came from behind.

Correspondence ID: 2258 **Project:** 11759 **Document:** 38106
Received: Apr,21,2011 10:18:22
Correspondence Type: Web Form
Correspondence: We're dog owners who support the plan. While we love our dog we also love the wild animals and having areas kept clean and safe for children and picnics. Off leash dogs are impossible to keep from interfering with the wild animals' breeding and living space. Additionally, it is problematic to clean up pet waste when they are able to roam at will, far from the owners control. Even on leash in areas where children play or families picnic dogs will soil the area.

We also wish that existing leash laws were enforced.

Thank you,

Ann and Glen

Correspondence ID: 2259 **Project:** 11759 **Document:** 38106
Received: Apr,21,2011 10:49:28
Correspondence Type: Web Form
Correspondence: To: Frank Dean General Superintendent, GGNRA

Mr. Dean,

As a senior and somewhat disabled citizen of San Francisco, I am deeply concerned about the proposed new Dog Management Plan for the GGNRA. I've taken my dogs to Ft. Funston and Crissy Field for the last 20 years.

When I was younger it gave me the opportunity to run with my dogs. Now that I can no longer do that I still go to the GGNRA at least once a day to walk my dogs off leash. I get my exercise and they get theirs. I'm sure you've heard all the arguments against the proposal so I won't bother to repeat them. I will say, however, that with the vast land area the GGNRA covers, it seems only fair that the less than 1% that is now off leash for dogs continues to be so.

How about making some money for the GGNRA by setting up a snack and coffee bar along with a small dog supply store and dog bath as they have at Pt. Isabel in Richmond as part of the East Bay Park system? It's a win win situation for them.

Joanne McGrail

Correspondence ID: 2260 **Project:** 11759 **Document:** 38106

Received: Apr,21,2011 13:20:58

Correspondence Type: Web Form

Correspondence: I am writing to strongly oppose GGNRA's plan to sharply reduce off-leash areas in San Francisco. I have a 3-year-old yellow lab and, like a lot of other dogs in San Francisco, he (and I) depends on off-leash areas to get his our exercise and stay fit. There are very few spaces where we can do that now, but if these new regulations pass, there will be virtually NO space left to run free. This would have a terrible effect on my dog and me and thousands of other dogs and their owners. I was under the impression that GGNRA was established to provide urban recreation areas. This rule would have the exact opposite effect. There is plenty of room at Fort Funston and other off-leash areas for people and dogs to peacefully coexist. Please don't take these last remaining off-leash areas away from us!

Thank you,

Peter Kupfer

Correspondence ID: 2261 **Project:** 11759 **Document:** 38106

Received: Apr,21,2011 15:13:00

Correspondence Type: Web Form

Correspondence: I am OPPOSED to to the plan restricting the dogs. The dogs should be able to run off leash in these areas and exercise. They have been playing there for years and no problems.

Correspondence 2262 **Project:** 11759 **Document:** 38106

ID:**Received:** Apr,21,2011 18:46:05**Correspondence** Web Form**Type:****Correspondence:** I am supportive of the dog plan; I find there are too many times especially at Crissy Field where, because of the dogs off leash, I am too fearful of walking. That becomes worse when I'm there with children.

I also think the negative impact of dogs to our environment is not limited to damage they may cause to the plants and animals living in the area but because of the vast amounts of waste they produce regardless of whether the owners pick it up or not.

Correspondence 2263 **Project:** 11759 **Document:** 38106**ID:****Received:** Apr,21,2011 19:33:16**Correspondence** Web Form**Type:****Correspondence:** We have long (more than 20 years) owned a house on the water at Stinson Beach, and we have always had a dog. We have never had a problem from dogs on the beach, and we are always happy to observe the happiness of the dogs in that environment and their owners. 90 percent of all owners seem to be aware of their dogs manners, clean up after them, and are cognizant of not letting them chase people, birds, or other wildlife. This is part of the unique pleasure of this area and should remain, as it seems to be doing no harm, for the many years we have participated in it and observed the freedom of dogs and owners at Stinson Beach.

Correspondence 2264 **Project:** 11759 **Document:** 38106**ID:****Received:** Apr,22,2011 11:46:45**Correspondence** Web Form**Type:****Correspondence:** While I'm a dog lover, I'm also a wildlife lover.

It disturbs me to go to wildlife-sensitive areas and see off-leash dogs running around, which happens in San Francisco on a regular basis. Whether in Golden Gate Park or marshland areas like Pier 94 or Heron's Head Park, more often than not I see at least one dog-owner violating leash regulations. It's nesting season now, and in the last month I've seen dogs romping through marshland and lakeside areas, potentially disrupting the breeding cycle. At Heron's Head, a great blue heron was recently killed, probably by a dog.

Dog owners have a choice as to whether to own a dog, and where to walk it. Birds and other wildlife do not have that choice. While dog owners are

emotional about their pets, a reasonable balance must be struck. Please restrict off-leash areas where wildlife and other park-users may be negatively impacted.

Correspondence ID: 2265 **Project:** 11759 **Document:** 38106
Received: Apr,22,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please keep these areas open to dogs off leash. A dog under voice control will cause no more environmental harm than a child under voice control, i.e. none if the child's parents or the dog's owners are doing their job. I am a Sierra Club member of many years -- as well as a Sierra Club employee of more than 20 years -- and I disagree vehemently with the stand of the Sierra Club's Bay chapter.

Correspondence ID: 2266 **Project:** 11759 **Document:** 38106
Received: Apr,22,2011 13:52:15
Correspondence Type: Web Form
Correspondence: How much area in total does the GGNRA currently manage? To drastically limit the areas where people can bring their dogs less than the current 1 percent of the park that now available for off-lead activity, seems excessive. The GGNRA manages an urban recreational area - it is not a Yellowstone or a Yosemite. What are the populations of the surrounding areas of Yellowstone and Yosemite? What is it here in the Bay Area? They do not compare. Again we are an URBAN population, we, the population are a MUCH bigger factor than anything else. We are not asking for MORE land for off leash use.... we are just asking that it remain as is and not LESSEN.

Based on the census, there are more dogs than children in San Francisco. This city has always recognized and embraced animal companionship. For many of our citizens, their pet companions are family.

I can count the number of times I have been to a GGNRA park/area before my dog came into my life. She gets me out. She helps me enjoy recreation, and the GGNRA. I can count the number of people at Funston that I see without a dog on any given trip. It is not many. Where it is conversely in the midst of the Presido and a very nice mix at Chrissy Field.

To limit the off leash areas as the plan suggest is to drastically change my life, and my dog's life - both to our detriment.

Correspondence ID: 2267 **Project:** 11759 **Document:** 38106

Received: Apr,22,2011 18:16:24

Correspondence Web Form

Type:

Correspondence: Please do keep as much space as possible free of un-leashed dogs. I walk regularly in many of the GGNRA places, and strongly dislike being accosted by dogs, and having to make my way among them running free. I think it is terrible that dogs disturb the wildlife that was there long before there were dogs in the areas. I have seen dogs running under the bridge that goes across the lagoon outlet at Crissy Field, and up into the supposedly protected lagoon area! These were dogs that were being "controlled" by a dog-walker, but were obviously not under her control; she called after them but that did not work.

Thank you for your consideration. Joyce Lehmann

Correspondence ID: 2268 **Project:** 11759 **Document:** 38106

Received: Apr,22,2011 19:04:37

Correspondence Web Form

Type:

Correspondence: I am delighted that you are considering more restrictive dog rules as I am a frequent hiker who find dogs sniffing at me, barking at me, licking me all extremely noxious. I do not believe voice control is adequate in any event- it is not a reasonable alternative to dogs being on leash. If a spot is okay for off leash dogs, such as Crissy field, I will avoid that place. I hope you will make the requirement for dogs to either be outlawed or on leash as broad as possible so that people like me will not be imposed upon by the dogs of others. When I ask people to take charge of their dogs, the usual response is "he's friendly." I should not be required to make friends with other people's dogs against my wishes. Thank you for your assistance with this most unpleasant issue.

Correspondence ID: 2269 **Project:** 11759 **Document:** 38106

Received: Apr,22,2011 22:10:58

Correspondence Web Form

Type:

Correspondence: My wife and I have been living in Marin county for over 30 years.

We now have a new 6 month old rescue puppy.

Part of the reason we have this dog is that my wife is retired and loves to hike alone but is sometimes uneasy as a woman walking alone. We want the dog to be able to accompany her on all of her hikes to provide her with peace of mind.

It is more enjoyable for her and for the dog if the dog can be off the leash on under voice control - while my wife is a runner, there is no way she can run as hard and fast as a dog. The dog comes back on command, stays in sight and has been trained not to chase anything and not to jump up when she is greeting people, she does not bark.

My wife has let me know that she has met a number of women walking with dogs who say that they would not feel as comfortable and in some cases would curtail their walks if their dog companions could not be with them.

Older people owning dogs is a growing population in Marin - and these owners are becoming more and more responsible - not less. Everywhere you go you see people cleaning up after their dogs - something that was unheard of even in recent memory - and the dog owning community provides its own culture and standards of what is not acceptable in other dog owners - no chasing birds, barking is discouraged, ill-manner animals are not readily tolerated -- peer pressure is continuing to wake all of us to being responsible to the community for the impact of our dogs.

Please consider expanding rather than restricting the trails and beaches where dog can be taken and please expand, rather than decrease the places where dogs can be allowed off leash under voice control.

(cracking down on offenders rather than penalizing all dog owners would likely make a more positive difference for everyone)

Correspondence ID: 2270 **Project:** 11759 **Document:** 38106

Received: Apr,23,2011 12:02:46

Correspondence Type: Web Form

Correspondence: I strongly support Alternative D, Most Protective Based on Resource Protection and Visitor Safety.

I feel that it is important to provide the maximum amount of protection for plant and animal species, including and especially endangered species, found in wildlife sites managed by GGNRA. Therefore, I feel that dogs should be excluded from these sites or, if permitted, always be on leash at all times. I feel that Alternative D is also important for protecting visitors, including myself, who frequent these wildlife sites and for reducing the cost to GGNRA for maintaining, restoring, and cleaning up these wildlife sites from the impacts caused by dogs. Although a "dog-lover" and former owner of dogs over many years, I realize the problems that dogs can create and I also feel that even well-behaved and well-trained dogs can behave unpredictably at times, even to the surprise of their owners. Therefore, every effort should be made to protect wildlife habitat and visitors to GGNRA

sites as outlined for Alternative D in the Executive Summary for the GGNRA Draft Dog Management Plan/Environmental Impact Statement.

Correspondence ID: 2271 **Project:** 11759 **Document:** 38106
Received: Apr,23,2011 12:42:27
Correspondence Type: Web Form
Correspondence: Dear GGNRA Management: I hope you reconsider your ban on dogs in certain areas of your parklands especially Sweeney Ridge and Mori Point in Pacifica. I fail to see how well behaved dogs on or off leash make such a negative impact when I see the mess humans can make; for example, a soiled baby diaper in some bushes on Sweeney Ridge. The East Bay Regional Parks have no such restrictions and they continue to be lovely places to hike for everyone. Please don't make me drive one hour each to enjoy a day's hike with my dog, just think of the added congestion and pollution! Debora A Kane

Correspondence ID: 2272 **Project:** 11759 **Document:** 38106
Received: Apr,23,2011 15:22:48
Correspondence Type: Web Form
Correspondence: Saturday, April 23, 2011

Dear National Park Service and GGNRA near San Francisco, I am strongly in favor of the maximum restrictions on dogs being considered in the GGNRA.

I am a practicing MD and have lived in the Bay Area off and on since the mid-seventies. In my comments, please forgive me for not remembering exact dates, but my impressions are very strong nevertheless.

For 20-25 years I went to Rodeo Beach and it was my favorite place in the world. I moved away for a time, and after my return (maybe 10 years ago), something there changed - there were enormous numbers of dogs running around. The air actually smelled like dog feces. I sat on the beach with my wife, as I had done dozens of times in the past, and dozens of dogs were running all over. At one point a large golden retriever, apparently misidentifying us as its owners, ran to us and jumped on my wife, happily sinking its claw into her leg, which began oozing a trickle of blood. The owner ran over and apologized.

The experience was very disturbing and dramatically different from my earlier experiences there. We went to the security station and complained - the security officer agreed that the whole place had begun to have the odor

of feces, but said there was nothing they could do about it because of the rules allowing dogs.

I have not returned to Rodeo Beach since.

I realize that prohibiting dogs at Rodeo Beach specifically is not an option which is being proposed, but - extrapolating to all the other areas in question - the presence of large numbers of dogs in a concentrated area is a disaster for visitors - the dogs cannot be controlled - this is an undeniable fact, despite the often delusional claims of dog owners - and the owners do not clean after the animals, despite the owners claims.

Again, I am strongly in favor of the maximum restrictions on dogs being considered in the GGNRA. The smell of feces and experience of being physically injured are not the reasons I go to beautiful recreation areas.

Correspondence ID: 2273 **Project:** 11759 **Document:** 38106
Received: Apr,23,2011 16:01:56
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean and GGNRA,

I am writing regarding the Dog Management Plan/DEIS for the GGNRA. I am concerned about the impact of off-leash dog activities on the habitat and wildlife of the GGNRA. I believe that all off-leash areas should be fenced. By fencing all areas where dogs run off-leash, plant life and wild life will be protected. In addition, fences provide security for all park users.

I support some trails being entirely closed to dogs. Other trails may be open to dogs on leash. And I believe that there should be areas, fenced in, for dog walkers and all others who desire to let their dogs run off-leash.

Thank you.

Sincerely,

Sandy Turk

Correspondence ID: 2274 **Project:** 11759 **Document:** 38106
Received: Apr,23,2011 19:16:48
Correspondence Type: Web Form
Correspondence: To Whom It May Concern, I am a native San Franciscan. I currently reside in the Outer Sunset, a block away from Ocean Beach. I have been recreating

on GGNRA land since the late 1970's. I grew up enjoying all of the places that have been the topic of recent discussion. GGNRA land has always been an integral part of my life. I now have a small dog walking business because of which, I frequent Fort Funston ten times per week. I think it is one of the most beautiful places on earth, I cherish this land and pick up litter daily to help in its preservation (an overwhelming amount of trash exists due to humans, not dogs) ?being able to enjoy this land greatly enhances my life and those of my canine companions. As a result, the lives of my human clients are enhanced as they are the proud owners of exceptionally well exercised, socialized and well behaved dogs. Dogs that are not adequately exercised can develop behavioral problems such as barking, destroying property in the home, etc. This obviously creates a ripple effect, extending into the neighborhoods and communities throughout our fine city. If the few existing off leash areas were further prohibited as proposed by the GGNRA, the result would be devastating for all. All of the parks in San Francisco that are not part of GGNRA land, will be overrun by dogs. The DEIS does not adequately address dispersion issues. The DEIS does not adequately address the environmental and social impact of forcing large numbers of people and dogs into much smaller areas. Reducing the amount of area available for off-leash will significantly degrade the park experience for people with dogs. It will increase conflicts. Even more importantly, the DEIS does not address the environmental and social impact on small, neighborhood parks in cities like San Francisco next to the GGNRA. Because the GGNRA is located immediately adjacent to one of the most densely populated areas in the United States (San Francisco), it provides much needed recreational open space for Bay Area residents. If that open space is lost to recreational access, people and their dogs will move to the much smaller city parks and they will not be able to absorb the hundreds or thousands of people with dogs each day that will be kicked out of the GGNRA. As further proof that the GGNRA did not consider impacts on city parks in San Francisco, the Preferred Alternative suggests the nearest legal off-leash area in San Francisco to Fort Funston is Lake Merced. That off-leash area has been closed to off-leash for years and has been turned into a native plant restoration area and habitat for the endangered red-legged frog among other animals. Yet this is where the DEIS suggests people with dogs go. This exemplifies the lack of common sense and awareness present in these overly restrictive plans. For the sake of all San Franciscans, a better alternative must be reached. Furthermore, as an environmentalist, I believe there should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status can be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined ? by volunteers biased against dogs? by surveillance cameras? ? is not included in the DEIS.

This "Dog Plan" is an attempt to move green spaces away from recreational use and towards preservation, which reduces uses for people too. This is blatantly inappropriate, as these "recreational areas" were designed specifically for urban dwellers such as myself to enjoy. The GGNRA should develop a new alternative, the A+ Option that will better balance the recreational needs of the Bay Area with protection of natural resources. If this more fair and well balanced agreement cannot be reached, please choose Alternative A (no action). This meager 1% of GGNRA land available for off leash dog recreation is really important to those of us that cherish it. I pay taxes as both a resident and business of San Francisco and count on taking the dogs I care for off leash at Fort Funston. I am just one of many professional dog guardians, who act mindfully and responsibly while sharing the land. Conducting my business as well as recreating on this land means everything to me. I do not deserve to have it taken away. Thank you for considering my comments.

Sincerely, Rasan Lowell SF CA 94122

Correspondence ID: 2275 **Project:** 11759 **Document:** 38106

Received: Apr,23,2011 19:32:02

Correspondence Type: Web Form

Correspondence: I am opposed to further restrictions on unleashed dogs at the various san francisco beaches including ocean beach. Dog owners are taxpayers who fund the ggnra. responsible dog owners are also citizens of this area and are already hugely restricted as to where their dogs may run freely. The eco systems of our city beaches are essentially a redundancy and the wear and tear they are subjected to by dogs is not much different than the wear and tear by the weather, children and many adults. It is unrealistic to preserve these areas as museums. They are natural beaches closely connected to a crowded city and as residents of this area, people should be able to enjoy them as such either with or without their canines. To the best of my knowlege there is no special nesting ground on the beaches included in this proposal. There are no rare plants that must be protected. The fact is the plants are common and they regrow quickly and birds can fly away if annoyed. San Franciscans need open space for their dogs.

Correspondence ID: 2276 **Project:** 11759 **Document:** 38106

Received: Apr,23,2011 22:34:27

Correspondence Type: Web Form

Correspondence: I am shocked and disappointed that my tax dollars have been used to prepare a study that focuses on how to "protect" the parks from dogs. I find this to be hypocritical. The parks should be protected from humans, not from dogs.

I visit Crissy field almost every day, and almost every day I see humans littering there, making noise, and generally making a mess a hundred times greater than the dogs do. The author of this study should be deeply ashamed that they are going after the dogs instead of the true villains despoiling nature: humans.

I strongly oppose any changes in policy that make it harder for dogs to be off leash. I plan to do some research to find out which organization is best positioned to make a strong legal challenge to this evil plan, and to contribute generously to them. I will also vote against any officials who fail to oppose it and I will write my elected representatives asking they do everything in their power to get the people responsible for this horrible abortion fired. How do you guys sleep at night?

Correspondence ID: 2277 **Project:** 11759 **Document:** 38106

Received: Apr,24,2011 10:41:56

Correspondence Type: Web Form

Type:

Correspondence: I have lived in Northern California for 37 years and became an active hiker in 2005 when a beautiful, active Vizsla named Bella came in to our lives. We became acquainted lots of hiking areas and particularly with the Fort Funston. My husband and I make the journey from Martinez to San Francisco to hike with Bella at the beach almost every weekend. We have commented often how lucky we are that "California" has been such avid protectors of all of this open space for ALL to enjoy. I have siblings and in-laws who live in other parts of the country who hike with us when they are visiting are in awe of the privilege as well. Please protect this for ALL. It is necessary for dogs to have a place to socialize with other people and their own kind and run FREE!! It is large part of what makes living in the Bay Area such a fantastic place to live.

In particular, Vizsla's are a breed that need to run big; perhaps not everyone with a dog has the same NEED but basic socialization is an important reality of our four legged friends.

If you are among the people making this decision, please make your way to Fort Funston on any Saturday or Sunday to see the pure joy of dogs and their families. We have met wonderful people, great dogs and enjoy beautiful hiking. This is a quality of life decision you are making for a lot of people in the Bay Area.

Please, please, please make this decision carefully.

Correspondence ID: 2278 **Project:** 11759 **Document:** 38106

Received: Apr,24,2011 12:43:17
Correspondence Type: Web Form
Correspondence: To whom it may concern:

I live in Cow Hollow and I walk on Crissy Field at least 5 times a week. I am 69 years old. The dog problem there is not going to be solved by the recommended Alternative. Dogs and their owners will still make it unpleasant, unsafe, and unhealthy for adults and especially for children.

The beaches where dogs are allowed are awful. They are basically dog bathrooms. I am sure they are a public health hazard. Innocent children wander into these areas to play. They dig in the sand and put the sand in their mouths. I am horrified. I will not take my grand children anywhere near these places.

The leashes people use for their dogs are often 20 feet long. Virtually every time I walk there I have a dog run into me, wrap a leash around me, or accost me. I have grandchildren and I fear for their safety. Dogs bite children, even when they are on leashes.

These comments apply to all dog owners. Even the ones that comply with the law. Many, if not most, dog owners do not comply with the law.

If the NPS buckles to the interests of dog owners then the Park Service must enforce the laws strictly. This will cost money. My money. I do not want to pay for this.

I suggest that if you are going to allow dogs then dog owners should be licensed and there should be a large enough license fee to cover maintenance of the areas and enforcement. The fee should be of the order of \$500.00 annually with a discount for elderly and handicapped. Dog walkers should display the license prominently so the law is easily enforced. Dog access to Crissy Field is not a right, it is a privilege.

Thank you for seriously considering my comments and recommendations.

Correspondence ID: 2279 **Project:** 11759 **Document:** 38106

Received: Apr,24,2011 12:48:23
Correspondence Type: Web Form

Correspondence: This is a terrible plan and it should be withdrawn. This plan will materially adversely impact our parks, our dogs, and our community as a whole. The benefits of the plan are far outweighed by the negative impacts it will cause.

Correspondence ID: 2280 **Project:** 11759 **Document:** 38106

Received: Apr,24,2011 13:07:15

Correspondence Type: Web Form

Correspondence: I have been going to Rodeo/Chronkite Beach for over 20 years. It's a great beach, and the closest and easiest to get to from Central Marin. Because of it's proximity to population centers it gets a lot of use from a wide variety of people.

I don't have a dog currently, but grew up with dogs and enjoy them. However, I agree with the plan to exclude dogs from Rodeo Beach, whether off or on leash. Dogs and their owners have reduced my activities and visits to this beach. After my youngest son was bitten by a dog (not at Rodeo) he was afraid of dogs for a few years and we stayed away from beaches that permitted dogs off leash. But my main objective is dog owners not cleaning up dog poop. By fall the beach sand at Rodeo is full of dog crap. There are also the wildlife protection issues, but others have addressed those.

On the days that are warm enough to lay down on a towel on Rodeo beach, you better check your area for dog feces first. I also body board but wouldn't want to swim here. Some years this beach is reported as having a high fecal count, possibly from dog activity. When dogs are off leash, many pet owners won't see their dogs poop and don't have an opportunity to pick it up. But even if they do or their dogs are on a leash, most pet owners won't pick up after their dogs. It is so much easier to kick some sand over the poop than carry a bag full of poop around.

It really is a shame that poor behavior by dogs and their owners ruins a good thing for other dog's and owners. If I had a dog, I would want a place to throw a ball into the water so my dog could chase it. But because of it's high use and National Park Status, I don't think Rodeo Beach is this place.

As the population of people and dogs increase, our parks get more use and the incompatibilities and conflicts between users become an issue. As dogs are excluded from some areas, other parks see an increase in dogs. Because of inconsiderate dog owners, heavy dog use and people use of parks are essentially incompatible. Ideally dogs will have a designated area to recreate with their owners. More dog parks are needed, but I don't think it is the National Park's duty to provide them.

Correspondence ID: 2281 **Project:** 11759 **Document:** 38106

Received: Apr,24,2011 13:42:22

Correspondence Type: Web Form

Correspondence: The documents associated with the proposed plan are inaccessible for many people and what is being proposed is not at all clear.

I do NOT support any plan that changes how or where I can walk my dog. The San Francisco Bay Area has been the most dog-friendly place I have ever lived and it is this culture of acceptance of the rights of dog owners that makes living here so enjoyable.

Correspondence ID: 2282 **Project:** 11759 **Document:** 38106

Received: Apr,24,2011 13:45:32

Correspondence Type: Web Form

Correspondence: There is no need to change the way dogs are managed in the GGNRA. I do not support any plan that changes how or where I can walk with my dog. He is my best friend.

Correspondence ID: 2283 **Project:** 11759 **Document:** 38106

Received: Apr,24,2011 16:11:52

Correspondence Type: Web Form

Correspondence: Please tighten the controls on walking dogs in the GGNRA beyond those in the current draft plan. The population of dogs is too great for the area to bear without significant degradation of the environment and wildlife even if all dog walkers are responsible community members. Unfortunately, not all dog walkers are responsible in walking their dogs, making strict rules even more necessary.

Off-leash areas should be fenced; dogs and their owners will tend to overlook the boundaries otherwise. Scofflaws should face a realistic prospect of ticketing when they allow their dogs off-leash outside the permitted areas. The target should be nearly complete compliance with the rules, not merely 75%. Commercial dog walkers should be prohibited. Some trails should be closed to dogs, even on-leash. Dogs make some people anxious. Dogs whose owners do not properly clean up after their dogs foul the trail. People who do not care to have to deal with these problems should have some refuge.

Thank you for your consideration.

Correspondence ID: 2284 **Project:** 11759 **Document:** 38106

Received: Apr,24,2011 00:00:00

Correspondence Type: Web Form

Correspondence: My recreation involves spending a lot of time in parks enjoying the wildlife, especially birds. In my experience, the negative impact of off-leash and even-on leash dogs is being vastly underestimated. No matter what the leash laws are, it seems people won't obey them. So, at a minimum any off-leash areas need to be fenced, to clearly demarcate the approved off-leash areas. There must be no confusion.

Second, there has to be HUGE FINES FOR BREAKING THE LEASH LAWS. THE LEASH LAWS HAVE TO BE 100% enforced, or people won't discontinue their old habits.

Third, commercial dog walkers should absolutely NOT be allowed in the GGNRA. Not only do they fail to control their pack of dogs adequately, but I do not think that the park should be for the recreation of the dogs. It should be for the conservation of the birds, plants and wildlife and those people (not dogs) who enjoy such natural resources. I pay taxes to support the parks, not to support other people's dog recreation areas as they are walked by professional dog walkers, who should be providing their own dog runs on their own property, not at my expense as a tax payer.

Sensitive areas should not permit any dogs, because the dogs even on a leash disturb nesting birds and quite frankly I am also tired of being harassed, sniffed, slobbered on, or growled at by dogs everywhere I go. Can't I go anywhere away from dogs and just enjoy the birds?

The preservation and conservation of the natural wildlife in our parks is far more important than the recreational life of our country's dogs. They don't belong in our national parks, at all. But, since I'm not going to win that battle, let's at least arrive at some decent enforcement and preservation of my right to enjoy our birds in our parks without disturbance and harassment from dogs.

A tax paying citizen,

Johanna van de Woestijne

Correspondence ID: 2285 **Project:** 11759 **Document:** 38106
Received: Apr,24,2011 18:00:27
Correspondence Type: Web Form
Correspondence: Please keep the dog access to the parks as they are currently.

Correspondence ID: 2286 **Project:** 11759 **Document:** 38106
Received: Apr,24,2011 18:49:16
Correspondence Type: Web Form

Correspondence: Several comments: 1. Fort Funston. Much too small an off leash area in a park that has traditionally been off leash for the entire area except for areas that are under renovation. Fort Funston is a dog park. Keep it that way.

2. Sweeney Ridge: You need some off leash trails here. Of the alternatives offered, Alternative A is the best of a poor lot.

3. Pedro Point. Should be off leash. Great trail for dogs - you don't even have a trail for leashed dogs in your proposal.

4. Ocean Beach: Alternative A is the best option.

Basically, your plan looks like it was drawn up by people who hate dogs and dog owners.

Tom Whitaker Pacifica, CA

Correspondence ID: 2287 **Project:** 11759 **Document:** 38106

Received: Apr,24,2011 19:39:10

Correspondence Type: Web Form

Correspondence: I am opposed to dogs being off leash in the GGRNA because of the environmental damage they will cause, as well as areas being monopolized by dogs who may or may not be friendly. Thank you, Charlotte Levin

Correspondence ID: 2288 **Project:** 11759 **Document:** 38106

Received: Apr,25,2011 11:06:20

Correspondence Type: Web Form

Correspondence: I wish to ask that all dogs be kept on leash at all times. Everyone says their dog is friendly and they are friendly. But I have a bad back and ankles. I can't handle a dog running up to me rushing around and jumping up. I am on my own with the owner some what far away and not able to assist me from a jumping dog. Most dogs do not respond on the first or second command to go back to the owner. As the majority of the citizens age, there are more people now who would be stressed just thinking if a dog running up to them will jump on them. I had a large over weight dog running around me and keeping me from getting back to my car when I had a small emergency. How can we afford law enforcement in the parks to make sure owners of dogs are keeping their animals under voice control, at least if they are required to be on a leash, other owners will remind those breaking the law to do the right thing. In the IJ today, a gentleman had to climb down a hill to help an injured lady. His dog(on a leash) kept other dogs off leash from hassling the injured woman laying on the ground. The population of dog

owners is growing and a dog is an individuals choice of life style. It is not the duty of the general public to be on call to entertain other peoples life styles by being objects of their dog's fun time. It is bad enough dealing with second hand smoke, but I don't like being a dog's toy or stepping in their poop.

Correspondence ID: 2289 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 13:15:24
Correspondence Type: Web Form
Correspondence: Please keep off leash dog access. It is so important for keeping adults,children and canines happy. It is such a wonderful gift to everyone to have this off leash access.

In a world that keeps getting harder and meaner, this is one of the few things that brings much happiness. It is greatly appreciated.

Please consider using this as an opportunity to raise funds for the park service. I believe that many users would gladly pay for an annual off leash permit.

My family thanks you for your considration in this matter.

Correspondence ID: 2290 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 17:15:28
Correspondence Type: Web Form
Correspondence: NO PERMITS TO WALK A DOG BY ANYBODY SHOULD EVER BE NEEDED AS LONG AS THEY ARE NOT WALKING MORE THAN 3 DOGS. IF YOU WALK OVER 3 DOGS, YOU NEED A PERMIT. ALL DOGS MUST BE ON A LEASH. NO DOGS SHOULD BE LEASH FREE IN ANY AREA OF THE PARK AT ANY TIME. I DOUBT THAT THERE IS ANY WILDLIFE LIFE IN THE PARK. THE PARK SERVICE IS EXTREMELY AGILE AT KILLING ALL WILDLIFE AND CONSTANTLY IS ON GUARD TO DO SO. WILDIFE ARE THE FIRST LIFE SACRIFICED BY ALL OUR FEDERAL GOVT AGENCIES, NPS AMONG THEM.

Correspondence ID: 2291 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 17:44:01
Correspondence Type: Web Form
Correspondence: To Whom it May Concern:

I believe that dogs off-leash are inappropriate for a park. They are a nuisance and a danger as well as being bad for the environment. There are plenty of designated dog runs where people can exercise their dogs and if they want to visit a park they should have their dogs on leashes.

I support your efforts to reduce the negative impact of off-leash dogs in GGNRA.

David Riedel

Correspondence ID: 2292 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Do not close our parks to dogs. Having a dog along on a hike in areas known to have Mountain Lions is a plus as well as many other reasons. Dogs serve as protection on the mountain.

Correspondence ID: 2293 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 21:42:16
Correspondence Type: Web Form
Correspondence: Dear Park managers,

I am writing to voice my support for dog management at Chrissy field. I write a a dog-owner and lover; however, Golden Gate National Recreation area is adversely impacted by large numbers of dog running off-leash. Visitors are often accosted by dogs. I have also witness many incidents of dogs chasing other wildlife and plants. Unfortunately, dogs are also allowed to foul the area without owners being responsible.

Visitors to this extraordinarily beautiful and singular place should be able to experience it without the environment being damaged and without other species being threatened.

I do not think off leash dogs belong in this area but please at least fence the off leash areas so people, wildlife and plants are protected. I also do not see any reason why commercial dog walkers should be allowed to come to this area. This had too much adverse impact. I would also like to see enforcement of these rules so that incidents other species are protected. Birds and other wildlife that is impacted cannot protect themselves.

Thanks you for your consideration.

Sincerely, Mary Krentz

Correspondence ID: 2294 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 06:56:28
Correspondence Type: Web Form
Correspondence: I think that the impact of so many dogs and dog walkers could be nicely minimized by simply charging for parking. Most of the dog walkers seem to drive, which has an additional environmental impact (carbon pawprint?) beyond that of the dog and nature. If we charge to park a car maybe we can reduce the numbers of dogs and raise some money for upkeep.

Correspondence ID: 2295 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 11:08:13
Correspondence Type: Web Form
Correspondence: Brett Becker, AICP Pacifica, CA 94044

April 26, 2011

Frank Dean General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Subject: Public Comments on the GGNRA Draft Dog Management
Plan/EIS

Dear Mr. Dean:

I hereby submit the following concerns and comments on the GGNRA Draft Dog Management Plan/EIS regarding the proposed Preferred Alternative for the Sweeney Ridge Trail System located in San Mateo County:

1) I am a Pacifica resident who has been using the Sweeney Ridge Trail System for over 3 years. I typically hike and run the trails 4 days a week with my dog on-leash (6 feet in length) between the Mori Ridge trailhead and Portola Discovery Site or SFPUC Portola Gate. I have also used the trail system for regular hiking with my family without dogs as well as mountain biking. I am fully in support of continued multi use of the Sweeney Ridge Trail System for all uses including dog walking (leash only), hiking, trail running, mountain biking, horseback riding, wildlife watching, etc. I am opposed to GGNRA Draft Dog Management Plan's Preferred Alternative, which would ban on-leash dog walking on the Sweeney Ridge Trail System.

My preference would be for Plan adoption of Alternative A (Map 19-A), which would allow continued multi use (including on-leash dog walking) throughout the Sweeney Ridge Trail System with the exception of the Notch Trail, which would allow hiking only. I would also support Plan adoption of Alternative A with Modification by also limiting use of the Meadow Loop Trail to hiking only. By providing two trails for hiking only, this would help reduce potential user conflicts while protecting the most sensitive habitats within the Sweeney Ridge Trail System. The Notch Trail is a narrow single track trail located within an identified sensitive Mission blue butterfly corridor. The Meadow Loop Trail is also a narrow single track trail located next to a sensitive fresh water wetland that likely supports California red-legged frog and potentially San Francisco garter snake. The rest of the trails within the Sweeney Ridge Trail System are wide enough (8-12+ feet) to allow continued multi use while avoiding user conflicts. Further, these trails are heavily degraded from a habitat standpoint since they are old ranch roads or paved roads that were used to access the old Nike Missile Site. Can you explain why Alternative A or Alternative A with Modification as described above would not be suitable to avoid use conflicts and protect sensitive habitat from trail user degradation? Please explain.

2) Please address the following observations that I've made based on my long term use of the Sweeney Ridge Trail System:

a) The trail system is made up of mostly wide dirt ranch roads and paved roads (8-12+ feet wide) that can easily accommodate multi use and allow for safe passing by users. These roads are wide enough to allow park ranger and CDF fire truck use. Please explain the reasons why this was not considered when deciding to ban dogs on-leash from the Sweeney Ridge Trail System.

b) Much of the trail system and surrounding area is degraded with abandoned and graffitied buildings, paved roads and ranch roads. These disturbed areas are not pristine in terms of sensitive habitat with the exception of the butterfly corridor at the Notch Trail and the freshwater wetland next to the Meadow Loop Trail. Please explain how banning dogs on-leash from the Sweeney Ridge Trail System would help reverse this existing degradation. There was no mention in the Dog Management Plan that the abandoned buildings would be removed and those areas restored with native vegetation. Wouldn't this be more effective in improving the trail user experience? Please explain.

c) The existing ranch and paved trails are surrounded by thick coastal scrub/chaparral vegetation (4-6 feet high in most places) with poison oak. It is highly unlikely that trail users with dogs on-leash would desire to go off trail or let their dogs off-leash so that the dogs could go off trail. Please explain why this was not considered in the Dog Management Plan.

- d) Most of the small offroad trails appear to be caused by wildlife (deer, coyote, etc.). Please explain why this was not considered in the Dog Management Plan.
- e) The Sweeney Ridge Trail System's topography is steep and rugged and is not suitable for beginner trail users, small children, or people with physical disabilities. This limits the number and diversity of users on the trail system and overall user conflicts. Please explain why this was not considered in the Dog Management Plan.
- f) In my experience, I have never had a conflict with another user while walking my dog on-leash and typically see between 0-20 people during my hikes on average. Considering this low number of user traffic, how can there be a case for significant user conflict to justify banning dogs on-leash from the Sweeney Ridge Trail System? Please explain.
- g) I have never observed professional dog walkers with multiple dogs (3 or more dogs) on the Sweeney Ridge Trail System. Please explain if this was a consideration in proposing to ban dogs on-leash from the Sweeney Ridge Trail System.
- h) The Sweeney Ridge Trail System is a multi-use trail system typically used by hikers, hikers with dogs on-leash, horseback riders, and mountain bikers. How can the EIS analyze the environmental impacts from hikers with dogs on-leash in isolation from the rest of the users? Please explain.
- i) The Dog Management Plan and EIS make the assumption that most hikers with dogs don't have dogs on-leash while on the Sweeney Ridge Trail System. However, in my observations, most hikers with dogs have their dogs on a 6 foot leash as required by GGNRA regulations. Please provide additional factual support for these assumptions.
- j) During my 3 years of use of the Sweeney Ridge Trail System and being on the trails approximately 4 days a week, I have observed park rangers only a handful of times. I think that additional ranger presence would help provide incentive for all users to follow the GGNRA regulations, including having dogs on a 6 foot leash. Please explain why this wasn't considered in the Dog Management Plan.
- k) There is limited signage at most of the trail heads. For example, there is not much signage at the Mori Ridge Trail entrance and the Portola Discovery Site area (intersection of Sweeney Ridge Trail, Baquiano Trail, and Sneath Lane Trail). There should be additional signage that explains the important rules and regulations applicable to all users similar to the signage installed at the Notch Trail entrance within Skyline College and the Milagra Ridge Trail System entrance. This would significantly help in reducing

potential user conflicts by educating trail users and reinforcing the regulations. Please explain why this wasn't considered in the Dog Management Plan for reducing user conflicts.

l) In order to protect the surrounding habitat and make sure trail users stay on the designated trails, there should be additional signage installed at the trail heads explaining w/illustrations the local habitat and wildlife. This signage should be similar to the signage installed at the Notch Trail entrance within Skyline College and the Milagra Ridge Trail System entrance. This would also help educate and reinforce GGNRA regulations. Please explain why this wasn't considered in the Dog Management Plan for reducing potential user conflicts within the Sweeney Ridge Trail System. m) Banning hikers with dogs on-leash would remove a significant user group from the Sweeney Ridge Trail System. Most of the hikers with dogs are local community residents and hike the trail often. Considering that the trails are steep and rugged and fairly remote, hikers with dogs serve as important eyes and ears on the trail system, especially since there is limited ranger presence. Please explain why this was not considered in the Dog Management Plan.

n) The Sweeny Ridge Trail System is one of the few trail systems left in the Bay Area to allow hiking with dogs on-leash. The trail system offers long and steep hikes that are great exercise for both the dog and dog owner. The Dog Management Plan does not provide an "apples to apples" analysis when describing alternative nearby locations to the Sweeney Ridge Trail System for hiking with dogs on-leash. Please explain this discrepancy.

3) Please address the following specific comments regarding sections of the Dog Management Plan/EIS:

a) Page 108, Chapter 2, the National Park Service Preferred Alternative section, Sweeney Ridge / Cattle Hill subsection ?

i) Please elaborate on how not allowing dog walking within the Sweeney Ridge area would protect Mission blue butterfly habitat? Dogs are required to be on a 6 foot leash per the regulations and most dog walkers using these trails have their dogs on a leash. Also, there are other users on the trail system, including hikers without dogs, mountain bikers and horseback riders. How is it that dog walking can cause impacts to Mission blue butterfly habitat but hiking without dogs, mountain biking and horseback riding doesn't? Please explain.

ii) Considering that the Sweeney Ridge Trail System is made up of wide dirt ranch roads and paved roads and includes numerous abandoned structures and debris, how is it that this portion can be considered undisturbed contiguous habitat that is rare and contains wildlife that could be disturbed

by the presence of dogs? Other areas outside of the designated trail system are inaccessible to hiker and dog alike due to the rugged topography and dense chaparral and poison oak vegetation. These are the areas that should be considered undisturbed contiguous habitat and by its very nature is already protected from degradation by humans and dogs. Please explain.

iii) The Sweeney Ridge / Cattle Hill subsection states that "this site is contiguous with the San Francisco watershed, which also does not allow dogs." This statement is misleading and incorrect. In fact, the Sweeney Ridge / Cattle Hill Trail System is contiguous to the San Francisco Public Utilities Commission Watershed Lands, which is predominantly off limits to the public, not just dogs, since these are pristine lands that provide the Bay Area with 15% of its drinking water source. Please explain why this incorrect comparative statement was made to support the Preferred Alternative?

iv) This subsection states that "Alternative C would be clear to the public and would be easily enforceable by park law enforcement staff." This statement is incorrect since it's not clear how the GGNRA will notify the public that dog walking is not allowed within the Sweeney Ridge area. Not to mention, other nearby San Mateo County and San Francisco County GGNRA sites are proposing their own site-specific areas where dog walking will be allowed, including such nearby sites as Mori Point and Milagra Ridge. Please consider that the public can access the Sweeney Ridge Trail System from multiple access points, and that there currently is limited signage to help educate the public to the GGNRA rules and regulations at the major trail heads within the Sweeney Ridge Trail System. This all seems like it will be a nightmare to effectively make clear to the public where dog walking is allowed/not allowed and to enforce. Wouldn't it be more effective to educate the public with appropriate signage and ranger presence while still allowing dog walking within the designated trails as is currently allowed? Please explain.

v) This subsection states that "Alternative C would allow multiple user groups to experience the trail and provide balance." This statement is incorrect. By not allowing hikers to walk with their dogs on-leash on most of the trail system, you are not allowing a significantly large user group from experiencing the trail. Please consider that many of the users of the Sweeney Ridge Trail System live locally and access the trail system from 3 very different geographical trail access points. These include the Mori Ridge Trailhead at Shelldance Nursery in North Pacifica, the Sneath Lane Trailhead in San Bruno, and the Baquiano Trail in South Pacifica. Please explain how this will allow multiple user groups to experience the trail system and provide balance?

b) P. 203-207, Chapter 2, Sweeney Ridge and Cattle Hill section of Table 5

?

i) There is a consistent argument made in this portion of Table 5 that Alternative C, the Preferred Alternative, which would not allow dog walking within the Sweeney Ridge Trail System, would have a negligible impact on most of the environmental resources because of the physical restraint of dogs via leash and dog walking only occurring on previously disturbed/designated trails. Why isn't this same argument made for Alternative A, the No Action Alternative? Under the No Action Alternative, dog walking with a leash would continue to be allowed throughout most of the Sweeney Ridge Trail System. The current GGNRA regulations require that dogs must be on a leash (6 feet in length) at all times and dog walking shall only occur on the previously disturbed/designated trails within the Sweeney Ridge Trail System. Per the GGNRA regulations for the Sweeney Ridge Trail System, off-leash dogs are prohibited. Therefore, wouldn't Alternative A have similar negligible impacts on most of the environmental resources because of the mandatory physical restraint of dogs via leash and dog walking only occurring on previously disturbed/designated trails? Please explain.

c) P. 273, Chapter 3, Table 9 ?

i) For the Sweeney Ridge / Cattle Hill site, the percentage of visitors walking dogs is described as Low to Moderate. However, it has been my experience (using the trail system approximately 4 days a week for at least 3 years) that the percentage of visitors walking dogs out of the total visitors (hikers, dog walkers, horseback riders, mountain bikers, etc.) is Moderate (10-30 percent) to High (> 30 percent). This means that visitors walking dogs represent a significantly large proportion of total visitors using the Sweeney Ridge Trail System. Please elaborate on how this visitor data was collected and why there seems to be a discrepancy in the proportion of visitors walking dogs?

d) P. 278, Chapter 3, Sweeney Ridge / Cattle Hill subsection ?

i) This subsection states that "Sweeney Ridge has low visitor use, consisting mostly of bikers and hikers, and low to moderate use by dog walkers (table 9)." Based on my experience using the Sweeney Ridge Trail System, I agree that Sweeney Ridge has low visitor use compared to other GGNRA sites. I disagree that visitor use is mostly bikers and hikers. In my experience, visitor use is mostly hikers and dog walkers. Please explain how this information was assessed and why it was assumed that bikers make up a large proportion of users on Sweeney Ridge? I also disagree that the proportion of dog walkers is low to moderate. Based on my experience, the proportion of dog walkers is moderate to high. Please explain this discrepancy. ii) This subsection states that "the closest off-leash dog

walking areas outside park property are Esplanade Beach in Pacifica and the San Bruno Dog Park." First, why are off-leash dog walking areas provided as examples when the Sweeney Ridge Trail System only allows on-leash dog walking? Other nearby examples should include on-leash dog walking areas. Second, even though the City of Pacifica allows dog walking on Esplanade Beach, for several years, Esplanade Beach has been completely inaccessible to the public, especially for dog walking, due to significant coastal erosion and storm destruction of coastal access points to this beach. Please explain these discrepancies.

e) P. 279-282, Chapter 3, Visitor Experience ?

i) This section provides a description and analysis of the visitor experience to the GGNRA sites relative to off-leash dogs. Please explain why this section does not also provide a description and analysis of the visitor experience relative to on-leash dogs? This would be especially applicable to the Sweeney Ridge Trail System (which currently allows dog walking on-leash only) since none of the Alternatives proposed for the Sweeney Ridge Trail System would allow off-leash dog walking. Please explain.

f) P. C-10, Paragraph 2, Appendix C, Potential Impacts to Vegetation from Dog Walking ?

i) This paragraph discusses that to minimize impacts to coastal scrub, chaparral, and grassland plant communities that are found at the GGNRA sites (including Sweeney Ridge / Cattle Hill), on-leash dog walking would be required at all sites except Oakwood Valley. It further discusses that by restricting dog walking to a 6-foot leash, the impacts would be limited to a 6-foot corridor immediately adjacent to the trails. This paragraph concludes by stating that "overall, impacts would be limited to the trail and the 6-foot corridor, which is a relatively small impacted area when compared to the size of each site." Based on my observations using the Sweeney Ridge trails, the trails are located predominantly within coastal scrub, chaparral, and grassland habitat. These trails consist of dirt ranch roads or paved roads that are approximately 8-12+ feet in width. Using the same logic and analysis described in Paragraph 2, one should conclude that since the Sweeney Ridge Trail System already requires dogs to be on-leash (6 feet in length), and since trails are 8-12+ feet in width, the impacts to the predominant habitat surrounding these trails would be negligible. Therefore, why does the Dog Management Plan's Preferred Alternative propose to not allow dog walking on-leash within the Sweeney Ridge Trail System? As described throughout the Dog Management Plan, physically restraining dogs on-leash would protect habitat and wildlife off trail and would eliminate chasing after wildlife. Please explain.

g) P. 293, Paragraph 4, Chapter 4, Potential Soil Impacts Common to all

Alternatives ? i) This paragraph states that "on-leash dog walking is based on an allowed 6-foot dog leash. In general, and assuming compliance, impacts as a result of the action alternatives (B?E) would be limited to the existing trails/roads and the 6-foot corridors of land adjacent to both sides of the trail ("limit of disturbance," or LOD; LOD = width of trail plus 12 feet). Restricting dogs to trails would concentrate impacts on the already compacted soils of trails/roads, whereas dog walking off-leash may cause more dispersed impacts over a wider area." Based on my observations using the Sweeney Ridge trails, the trails consist of already compacted dirt ranch roads or paved roads that are approximately 8-12+ feet in width. Using the same logic and analysis described in Paragraph 4, one should conclude that since the Sweeney Ridge Trail System already requires dogs to be on-leash (6 feet in length), and since trails are 8-12+ feet in width, the impacts to soils and erosion would be negligible. Therefore, why does the Dog Management Plan's Preferred Alternative propose to not allow dog walking on-leash within the Sweeney Ridge Trail System? Please explain.

h) P. 438-439, Chapter 4, Sweeney Ridge / Cattle Hill Alternative A: No Action ?

i) It is stated that "this site has documented high visitor use by dog walkers and 55 leash law violations were recorded in 2007/2008 (table 9); therefore, off-leash dog walking is currently occurring along the trails of Sweeney Ridge." I agree that there is high visitor use by dog walkers. Please make this correction in table 9 since it currently says low to moderate. I disagree with the assumption that because there were leash law violations over a two year period, that most dog walkers using the Sweeney Ridge Trail System have their dogs off-leash. Based on my experience of using the Sweeney Ridge Trail System (approximately 4 days a week for the past 3 years), I have observed that most dog walkers have their dogs on-leash. Rather than proposing to ban on-leash dog walking within the Sweeney Ridge area, wouldn't it be more effective to increase ranger presence (especially during busier times such as on weekends) and educate users of the GGNRA's on-leash rules in order to deter this behavior? Wouldn't it be more effective to provide better signage at the trail heads to explain the rules and regulations and why it's important to keep dogs on-leash and on trails in order to deter this behavior? Please explain. ii) What is the total number of dog walkers that visited the Sweeney Ridge Trail System during 2007/2008? Without knowing this number, it is impossible to know what percentage of total dog walkers were not obeying leash laws. This makes the 55 leash law violations meaningless without a total number of dog walkers to base it on. Please explain this discrepancy.

iii) Is there more comprehensive data over a longer time frame (10 years) that can be evaluated to determine dog walking trends within the Sweeney Ridge Trail System? Making off-leash dog walking assumptions based on

two years worth of incomplete data does not follow appropriate statistical methodology. Please explain. i) P. 440, Chapter 4, Sweeney Ridge / Cattle Hill Alternative C: Emphasis on Multiple Use, Balanced by County ?

i) It is stated that "under Alternative C, no dog walking would be allowed at Sweeney Ridge. Therefore, no impacts on soils from dogs would occur at this site, because dog use would be eliminated. Soil disturbance and compaction would no longer occur." I disagree with the statement that soil disturbance and compaction would no longer occur. Other users that would be allowed within Sweeney Ridge include hikers, mountain bikers, and horseback riders. These uses would surely cause further soil disturbance and compaction. Please explain this discrepancy.

j) P. 440, Chapter 4, Sweeney Ridge / Cattle Hill Alternative C: Emphasis on Multiple Use, Balanced by County ?

i) It is stated that "on-leash dog walking is based on an allowed 6-foot dog leash. Since dog walkers may walk along the edges of the trails, dogs would then have access to the adjacent land 6 feet in both directions, resulting in an LOD area for soils that would extend 6 feet out from both edges of the trails. In general, impacts on soils would be limited to the existing trails and the 6-foot corridors immediately adjacent to the trails." I disagree with the statement that there would be an LOD area for soils that would extend 6 feet out from both edges of the trails. The Sweeney Ridge Trail System consists of 8-12+ feet wide dirt ranch roads and paved roads surrounded predominantly by extremely dense chaparral and coastal scrub (poison oak) vegetation. In most places the chaparral and coastal scrub vegetation is at least 6 feet in height. This makes the side of these trails inaccessible to both humans and dogs. Please explain how there can be impacts within these 6-foot corridors immediately adjacent to the trails due to this natural vegetative obstacle?

k) P. 677, Chapter 4, Sweeney Ridge / Cattle Hill Alternative A: No Action ?

i) It is stated that "under Alternative A, dogs would continue to contribute to physical disturbance at both sites through trampling, digging, and dog waste. In addition, since off-leash dog walking currently occurs at the sites, it is likely that dogs would continue to walk or run through other undisturbed areas. Therefore, impacts on coastal scrub/chaparral/grassland vegetation as a result of Alternative A would continue to be long term, minor, and adverse at these sites because effects would be measurable and perceptible, but would be localized in a relatively small area." I disagree with this assessment. The Sweeney Ridge Trail System consists of 8-12+ feet wide dirt ranch roads and paved roads surrounded predominantly by extremely dense chaparral and coastal scrub (poison oak) vegetation. In

most places the chaparral and coastal scrub vegetation is at least 6 feet in height. This makes the side of these trails inaccessible to both humans and dogs. Further, on P. 540 of the Dog Management Plan, a study by Andrusiak (2003, 3.2) is cited that suggests that dogs traveling quietly along a trail with screening vegetation on both sides are unlikely to disturb or even encounter wildlife. This study along with other studies were summarized in this section to provide a basis for discussing impacts on vegetation. Since the dense and tall chaparral and coastal scrub vegetation within the Sweeney Ridge Trail System acts as barrier and screening vegetation, how can it be concluded that dogs would cause continued measureable and perceptible impacts to coastal scrub/chaparral/grassland vegetation if it's unlikely for dogs to trample through it or be triggered to trample through it by wildlife? Please explain.

l) P. 681, Chapter 4, Sweeney Ridge / Cattle Hill Alternative E ?

i) It is stated that "physically restraining dogs on-leash would protect vegetation off trail. Therefore, assuming compliance, the overall impacts on coastal scrub/chaparral/grassland vegetation from on-leash dog walking at Sweeney Ridge and Cattle Hill would be negligible because impacts would result in no measurable or perceptible changes in these plant communities." Why wasn't this same assessment made for Alternative A: No Action? Alternative A would continue to allow dog walking on-leash and similarly should assume compliance. Further, why isn't this 'physical restraint with a leash' argument not applied for all environmental resources under Alternative A with a conclusion that there would be negligible impacts on resources? Please explain.

m) P. 698, Chapter 4, Wetlands and Aquatic Habitats ?

i) Within the Sweeney Ridge Trail System, there is a freshwater wetland located adjacent to the Meadow Loop Trail. This section did not include an analysis for Sweeney Ridge and this freshwater wetland. Please address.

n) P. 1158-1159, Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative A ?

i) This section states that "Alternative A would continue to result in long-term minor adverse impacts on the Mission blue butterfly at Sweeney Ridge through damage to host plants and habitat in the trail beds and adjacent areas as a result of dogs." Please explain whether there is a high occurrence of lupine host plants and habitat within the trails beds. In my experience, the Sweeney Ridge Trail System is made up of wide dirt and paved roads/trails. The only vegetation observed within the dirt roads are invasive weedy species. Paved roads do not contain vegetation. Further, these roads/trails are used by park ranger vehicles, horseback riders, mountain bike riders, and

hikers without dogs. Wouldn't these other uses also have a damaging effect on host plants and habitat in the trails beds? Please explain.

o) P. 1162, Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative E ?

i) This section states "the long-term minor adverse impacts from dogs in the LOD would occur in a relatively small area when compared to the site as a whole; therefore, the overall impact on the Mission blue butterfly from on-leash dog walking at Sweeney Ridge would be negligible, assuming compliance." Why wasn't this assessment also applied to Alternative A? Please explain.

p) P. 1210-1211, 1213, Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative C / Preferred Alternative ?

i) This section states "at Cattle Hill, dogs would be allowed on-leash on the Baquiano Trail from Fassler Avenue up to and including the Farallons View Trail. Physically restraining dogs on-leash would not allow dog access to any water bodies that support the frogs or nonbreeding or critical habitat. Therefore, assuming compliance, Alternative C would result in negligible impacts on the frog at Cattle Hill because no measurable or perceptible changes in frogs or critical habitat or nonbreeding habitat would occur." Since Alternative A would also require all dogs to be on-leash, physically restraining dogs on-leash would also not allow dog access to any water bodies that support the frogs or nonbreeding or critical habitat located within the Sweeney Ridge Trail System and would therefore result in negligible impacts. Why wasn't this assessment made for Alternative A? Please explain.

q) P. 1231-1232, 1234 Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative C / Preferred Alternative ?

i) This section states that "although dogs would be allowed on the Cattle Hill trails, dogs would be physically restrained on-leash and the leash policy would be enforced. If dogs are physically restrained on-leash at this site, they should not gain access to dispersal habitat and should not affect the snake. Therefore, assuming compliance, alternative C would result in negligible impacts on the snake at Cattle Hill; no measurable or perceptible changes to individual snakes, the population, or designated critical habitat would occur." Since Alternative A would also require all dogs to be on-leash, physically restraining dogs on-leash would also not allow dog access to dispersal habitat located within the Sweeney Ridge Trail System and would therefore result in negligible impacts. Why wasn't this assessment made for Alternative A? Please explain.

r) P. 1545, 1548 Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative

C / Preferred Alternative ?

i) This section states that "impacts on visitors who would prefer to walk dogs at the park would be long term, minor, and adverse. Adverse impacts would occur since dog walkers would no longer be allowed in the Sweeney Ridge site. Visitors would no longer be able to enjoy exercising, socializing, and playing with their dogs at Sweeney Ridge. Impacts would be minor since this is a low to moderate use site for dog walkers. Some visitors in this user group may find a different area in GGNRA or a local city or county park to walk their dogs. As a result, visitation by local residents may decrease slightly in this area." Based on my experience using the Sweeney Ridge Trail System (approximately 4 days a week for the past 3 years), the proportion of dog walkers out of the total number of users is moderate to high and therefore adverse impacts should be moderate, not minor. Considering that most Bay Area state, county and local city parks do not allow dogs on-leash, there are not many options for dog walkers to choose from when they wish to hike with their dog on-leash. Dog parks are very limiting since they don't allow the owner to exercise with their dog. Other GGNRA sites are also limiting since they do not offer similar long and steep trails to hike that the Sweeney Ridge Trail System has to offer. Further, most dog walkers I've observed using the Sweeney Ridge Trail System are regular local community users. Therefore, visitation to Sweeney Ridge by local residents who wish to hike with their dogs on-leash would significantly decrease. Please explain how this information and analysis was derived since it conflicts with my experience and observations at Sweeney Ridge.

Please feel free to contact me via email at [redacted] if you have any questions regarding my concerns and comments. I would also like to request that you place me on your mailing list so that I may receive notifications of future public hearings and updates regarding the GGNRA Dog Management Plan/EIS.

Sincerely,

Brett Becker, AICP Sweeney Ridge Trail User

Correspondence ID: 2296 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 13:45:25
Correspondence Type: Web Form
Correspondence: The Golden Gate National Recreation Area's Draft Dog Management Plan should be completely rejected because provides no objective or factual rationale for making any changes now (on this point alone, the entire plan should be rejected). Common sense will tell you that reducing off-leash dog

rights on 1% of GGNRA land that currently allows dogs off-leash cannot have much benefit (if any) compared to the negative impacts to 1 in 3 SF households with dogs, SF city dog parks and local dog shelters. This issue is not about dog rights vs. bird rights. This issue is about discrimination against dog owners. Limiting my dog's access limits my access because I do not leave my family member locked up at home while I go walk alone in GGNRA lands.

Correspondence ID: 2297 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 17:05:54
Correspondence Type: Web Form
Correspondence: please allow dogs to be walked on these public lands. both on-leash and off leash under voice command.

thank you katrina charmatz

Correspondence ID: 2298 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 18:23:03
Correspondence Type: Web Form
Correspondence: I support the preferred alternative. Today, the supervisors passed the weiner resolution which puts them on records as opposing this plan. However, I believe that they are not fully informed and have clearly not thought about any groups except dog walkers. The state of dog management in the city parks and public lands is that there is none, which is something the city needs to address rather than expecting other lands to be used for dogs. There are many off leash legal areas in san francisco and even more illegal off leash areas. This areas are currently not overcrowded with dogs, however they are already unpleasant areas for people like myself who do not want to encounter off leash dogs. If having less off leash dogs in areas of sf ggnra increases the number of dogs in city parks this would likely not affect city parks negatively or drastically. In fact, it would create a space for socialization of dogs, which is apparently an important part of dog walking for dog owners. Furthermore, the preferred alternative would create space in the ggnra for people who currently can't enjoy any parks due to off leash dogs. If the city can't provide this space, it would be nice to have someone provide it.

Correspondence ID: 2299 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 18:28:48
Correspondence Type: Web Form

Correspondence: I have been walking at Fort Funston since I was a student at San Francisco State. I found this beautiful open space when I was walking around Lake Merced. Not knowing what it was I ventured across the street to discover this awesome piece of land full of happy people and happy off leash dogs! Little did I know that 4 years later I would make Fort Funston my home away from home. For the last 10 years I have been walking my packs of dogs twice a day on this awesome space. I have never worked in such a loving and supportive enviroment as I have these last 10 years. Not just with my colleagues but with private dog owners and even those that do not own dogs. There are many folks that come to the Fort that are elderly or have kids that do not own dogs but sure get their fill of tail wagging and licks by the time they leave. Knowing how much land the GGNRA has and that off leash dog recreation only encompasses 1% percent of that and now it is at risk saddens me. If the proposed plan passes, the inadequate small parcel of land allotted for "off leash" dog activity will create a dangerous and cramped atmosphere. The boundaries of bluffs, highway, and parking lot, will create a safety issue for dogs who need space to exercise and explore. This will adversely affect the quality of life at the surrounding local parks which can t provide the adequate space necessary for the hundreds of dogs banned fro Fort Funston. The ripple effect will be devastating on the local community, as well as the physical and mental health of our beloved canine family members. Fort Funston has been a dog friendly park even before it was ceded to the GGNRA, under certain conditions and requisites, back in 1979. The dogs are an intregral make up of the spirit, character, and landscape at Fort Funston.

Please leave us this 1% to have and enjoy with our canine kids.

Correspondence ID: 2300 **Project:** 11759 **Document:** 38106

Received: Apr,26,2011 19:32:29

Correspondence Type: Web Form

Correspondence: I support the efforts to enforce dog owners having to walk their dogs on a leash while dogs still being allowed in the park. Unfortunately there have been too many times I have seen other dog owners allowing their dogs to roam off leash and out of sight or voice command range. I enjoy walking in the park with my small dog, but do not enjoy having someone else large dog jump on me or my dog. I've had other dogs jump on me and threaten my dog and it takes away from my experience in the park always having to watch out for someone else's dog who's owner is no where to be found. Plus, there are plenty of other dog owners who do not clean up after their dog making it less pleasant for all of us. By making other dog owners have to walk their dog on a leash and clean up after their dog, the park will be more enjoyable for me and my dog.

Making rules like this also only work if they are enforced and I've been to other parks where dogs are supposed to be on a leash, only to see plenty of dog owners ignoring the rules and walking with their dog off leash. So if the Park Service is not planning to enforce these rules, they may as well not bother because there will be plenty of people who will choose to ignore them.

Correspondence ID: 2301 **Project:** 11759 **Document:** 38106

Received: Apr,26,2011 20:32:53

Correspondence Type: Web Form

Correspondence: I saw the sign posted at the Baker Beach picnic area, San Francisco, referring me to this forum. I have reviewed your plan for restricting dogs in currently allowed areas governed by NPS. I have, also, noted the vehement uproar of dog owners and dog owner associations. Some points that are noteworthy:

1) That there are dog owner associations at all. This city has more dogs than children. That these people feel that they need political representation for their animals is indicative of their underlying mental states. If they were talking about small breeds, more suited for dense urban environments, there wouldn't be much of an argument. But most contention involves those owners who have CHOSEN to get the biggest breeds their three-room apartments can hold. That, to me is a form of animal cruelty unto itself. That these owners then cry that their big dogs need "room to stretch their legs" and "calm down and be better behaved" reveals their non-savvy approach to dog ownership. Most vocal dog owners, also, do not raise children. This sad replacement therapy that they have chosen for themselves is reflected in their insistence that their animals be treated with the same respect as if the animals were actually human children.

2) These owners are predominantly upper social strata, living in the regal areas of the city most unprepared for dog ownership, mostly in the " _____ Heights" neighborhoods, where there is hardly room for the buildings, much less running spaces for dogs. The Dog Plan notes that there are many suitable alternate areas within 5 miles of the downtown area, easily accessed with a short car ride. Well, these people didn't buy that mansion on the hill to have to go to some NON-exclusive area to run their over-sized dogs.

3) These vocal owners are entrenched with the business and political power structure of San Francisco, and are used to doing as they please. The city of San Francisco has many beautiful parks, but only about 20 sanctioned areas (in a 49 square mile city) in which to run dogs off-leash. A lot of these areas are in obscure locations, unto themselves or in less than prime areas of the

parks that contain them. These owners flagrantly ignore all rules regarding Dog Play Areas (DPA's) as stated in The Recreation And Parks Department guidelines (Final Dog Policy 2002). Most illegal is these owners' use of dog-walking services. The guidelines clearly state no more than three dogs per person. "Professional" dog-walkers always have five or more. These dog owners, by the nature of their social status, do not feel at all bound by laws governing the "common" man.

4) The child-like spiteful nature of idle threats of the dog owner associations. One association has threatened to "take back" Ocean Beach from NPS regulation if the current Dog Plan is implemented. Ocean Beach is a protected habitat for sea-fowl. These owners have absolutely no regard for preserving the environments of threatened species. The ONLY feel that their privileged world's are threatened with what they see as undue regulation of the activities of the animals that they CHOSE to purchase and have in their lives. They do not appreciate, AT ALL, the penultimate threat to the very existence itself of these threatened species. These people are the Easter Islanders of our modern society here in San Francisco. They will not stop until it is too late for these poor creatures affected by our urban sprawl.

The NPS is tasked with the unpleasant duty of regulating people's otherwise random and usually destructive tendencies to conquer, utilize, and move on to other areas in the never ending "pursuit of happiness." But as We The People exhaust the areas of suitability for our homes and business ventures, we begin to encroach on wilderness areas which are essential havens for remaining wildlife, much of which is absolutely unique to the San Francisco peninsula, and cannot be found elsewhere. As the NPS Park Rangers and staff well know, ecological niches are not replaceable or relocatable. Birds have always been able to fly elsewhere, but some species only survive in singular locations. Dog owners, it seems, cannot see beyond their own selfish needs to share this world with other beings. And the dogs themselves CANNOT be blamed, for they are animals and are intrinsically selfish. We humans, with our amazing powers of forethought and reflection, MUST be the ones to stand up and protect dwindling habitats for lesser creatures from the factions of our society that pursue selfish aims for selfish goals. Big dogs belong on big properties, not perpetually on public property. Your Dog Plan certainly curtails usage throughout the Golden Gate NRA. And this will certainly "force" dog owners to misuse local parks, probably to the detriment of those city parks. But your domain at the NPS is to ensure the perpetuity of the National Park System. Please don't let the local bourgeois caste of the over-entitled bully you into non-sustainable policies. We have lost enough species on earth since the invention of the boat. Let's not lose anymore so that some rich people can fulfill their inner parent by supplanting a child with a dog. Let's reserve places for CHILDREN to run off leash; children can be taught not to harangue wildlife, and dogs can never be.

Correspondence ID: 2302 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 20:38:23
Correspondence Type: Web Form
Correspondence: I strongly support this project.

Correspondence ID: 2303 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 20:41:16
Correspondence Type: Web Form
Correspondence: This is solid and reasonable plan. Stick to it.

Correspondence ID: 2304 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 22:16:46
Correspondence Type: Web Form
Correspondence: My comments are from my personal experience only. This last weekend, we were walking with our granddaughters, ages 7 and 9, where there were several dogs off leash. Although I have no doubt that the dogs were friendly enough, their enthusiasm scared both our girls, to the point of their wanting us to pick them up.

Additionally, I stepped in what should have been collected and thrown in the trash.

I also have significant allergies, that I can manage with daily medication. One close encounter with fur can set me back the rest of the day. I would like to have enjoyed our day without all the drama.

Correspondence ID: 2305 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 23:02:39
Correspondence Type: Web Form
Correspondence: I love to let my dog run off leash along the more remote parts of the beach and she is very obedient when called or told to stop. But dogs have destroyed Fort Funston's highlands in the last 15 years, and I have seen numerous people and animals terrorized by badly behaved off-leash dogs. Irresponsible dog owners are ruining the parks and city for everyone and reasonable limits need to be enforced. The GGNRA is right and the Supes, as usual, are just pandering.

Correspondence ID: 2306 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 23:15:27
Correspondence Type: Web Form
Correspondence: Dogs have been free at Fort Funston for a long time

They are largely well controlled & abide by the rules

Do not change what we've got

Correspondence ID: 2307 **Project:** 11759 **Document:** 38106

Received: Apr,27,2011 00:08:55

Correspondence Type: Web Form

Correspondence: Dear Sirs,

I'm writing to commend you for your considered and fair-minded efforts at devising guidelines for dog owners on GGNRA which seek to balance the legitimate concerns of responsible dog enthusiasts with protection of this splendid place and the rights of human visitors not to be victimized by out-of-control canines rampaging its beaches, hills, meadows, brush, forests and the many other precious and fragile ecosystems that make out the GGNRA.

As a frequent user of the GGNRA, I can personally attest to packs of unleashed dogs harassing all manner of waterfowl at Ocean Beach (often under the amused eye of their owners); I've frequently witnessed large numbers of unleashed, uncontrolled dogs at OB and Fort Mason degrading the environment(i.e., crapping, digging, disturbing the underbrush, trampling sensitive areas, etc.) and generally making a nuisance of themselves (I'll note in passing that these often are brought there by professional dog walkers, who seem to mistake the GGNRA for their personal workplace).

I've been threatened by aggressive, unleashed dogs at Rodeo Beach, Tennessee Valley, and other locations. When asked to control their dogs, the owners often respond as aggressively as their pets.

I've seen dogs urinate in public playgrounds intended for children, while their owners looked on with amusement. Evidently, they thought it was funny. I think this is quite symptomatic of these people's mindset and attitude to others.

I've never seen a ranger, or any other authority figure, call these scofflaws to task. As long as there is little or no enforcement, they will continue to impudently flaunt the rules.

Please don't cave in to these fanatics who give responsible dog owners a bad name and to the SF supervisors who pander to them. They've turned just about every San Francisco park into a feces-strewn public toilet for the rest

of us; now, they want to do the same to the GGNRA! They respect nothing; they place their four-legged friends above the rights of their fellow citizens, including children, to clean, healthy, pristine outdoor recreational facilities. They claim to be animal lovers, but their behavior proves that they have neither understanding nor sympathy for the wild creatures, the fragile ecosystems their dogs destroy (let's face it: we all know dogs, especially unleashed, are deadly to these). Indeed, they are completely lacking in the crucial qualities needed to preserve this splendid environment: love of and respect for nature.

It is my fervent hope that because the GGNRA is under federal jurisdiction, the people who ultimately make the important decisions here will resist the pressure of parochial constituencies who seek to bend the rules to suit their narrow, ultimately destructive, interests, and instead take these above all on the basis of what's good for the health of the GGNRA as whole, for the preservation of this breathtaking, unique place for future generations and its enjoyment by all.

Best Regards,

Nicholas Marder

Correspondence ID: 2308 **Project:** 11759 **Document:** 38106

Received: Apr,27,2011 01:35:46

Correspondence Type: Web Form

Correspondence: I am commenting on the GGNRA Draft Dog Management Plan/EIR. I cannot comment on all the parks in the plan, but in general I believe the stricter the regulations on dog walking on public land the better. It is an unfortunate fact that no matter what regulations you impose, there will be people who disregard them. Every time I go to the park I see dogs off leash where they are supposed to be leashed.

I frequently go to Ocean Beach and Fort Funston. Many times I have been harassed by unleashed large dogs that run up to me ferociously barking as if they are going to attack me, while the dog owner is unable to get the dog to back off. I have been scared so many times that my boyfriend thinks I should carry a weapon to the beach with me.

At Fort Funston and lower Ocean Beach I have seen solitary (professional, I presume) dog-walkers with 14-15 dogs off-leash. Usually the number is over ten dogs per dog-walker. They cannot control all those dogs and they don't watch them closely enough to pick up their feces. Many dog owners feel their dog's poop is "part of nature" so it's okay to leave it on the beach.

On at least two occasions I have also seen packs of big dogs running around in the cliffs in the succulents while I was walking down to the beach from the Fort Funston hang-glider launch, with no owner in sight. Also, people walk their dogs through the areas that are supposed to be protected, preferring to walk on the succulents than get their shoes sandy on the walking path.

I feel that I have a right, as a taxpayer, to access public beaches and parks without harassment from vicious barking dogs or even friendly/curious wet dogs splashing me. Furthermore, the dogs run after the birds in the surf. For these reasons I support the required leashing of dogs in all public parks and beaches.

You will certainly need more staff to catch violators; there will be many people who ignore whatever plan is chosen (I have never once seen a ranger on the beach or in the park - do you have them?)

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| Correspondence ID: | 2309 | Project: 11759 | Document: 38106 |
| Received: | Apr,27,2011 09:55:47 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I interact with tourists and I often get the complaint that there are too many dogs that approach them. This makes the parks less attractive to the tourists and makes the bay area, less attractive as a vacation spot, which hurts our economy. We need areas without dogs and less areas with dogs on leash for tourists. | | |

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| Correspondence ID: | 2310 | Project: 11759 | Document: 38106 |
| Received: | Apr,27,2011 11:01:55 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | When I think of the GGNRA, I think of how lucky we are to have beautiful natural open space next to a metropolitan area. My vision does not include off leash dogs. I am a dog owner. I walk my dogs in my neighborhood and take them to designated off leash areas within the city. The GGNRA should not be an escape valve for a dog population that is needlessly exploding. We are saving dogs by adopting them from the Central Valley, other states, Taiwan, etc... San Francisco is a city of 49 square miles and under one million people. It is not a big city. It is a small city with a big reputation. Maybe we should be limiting the dog population instead of having an over population of dogs impacting nature and natural open spaces. I support GGNRA's proposed dog management plan. | | |

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| Correspondence ID: | 2311 | Project: 11759 | Document: 38106 |
|---------------------------|------|-----------------------|------------------------|

ID:**Received:** Apr,27,2011 12:15:44**Correspondence** Web Form**Type:****Correspondence:** I support the leash plan for Dog Management in GGNRA. Shoreline wildlife needs to be protected from offleash dogs.

Correspondence 2312 **Project:** 11759 **Document:** 38106**ID:****Received:** Apr,27,2011 13:23:54**Correspondence** Web Form**Type:****Correspondence:** My wife and I are dog lovers. We have a dog. We keep our dog on a leash. We wish other dog owners ("guardians") would do so as well. We are tired of continually having to protect our dog from off leash dogs that are allegedly under voice control but are completely out of control. We are in favor of strong leash laws in local, state and Federal parklands. Thank you.

Richard and Patricia Locke

Correspondence 2313 **Project:** 11759 **Document:** 38106**ID:****Received:** Apr,27,2011 15:14:27**Correspondence** Web Form**Type:****Correspondence:** I wholeheartedly support Michael Lynes, conversation director for the Golden Gate Audobon Society when he says that the proposed rules don't go far enough. AND I sincerely hope that the NPS doesn't give in to the all too powerful dog lobby of San Francisco. Quite frankly I think the recent SF Board of Supervisors decision is very misguided.Hold your ground and protect our wildlife, environment and public spaces.
(Note: public NOT animal/dog spaces)

Correspondence 2314 **Project:** 11759 **Document:** 38106**ID:****Received:** Apr,27,2011 18:31:29**Correspondence** Web Form**Type:****Correspondence:** As a dog lover myself, I nevertheless recognize many good reasons why dogs do NOT need free access to all parts of the GGNRA: 1. Dogs, especially unleashed dogs, can have a serious negative impact on other species in the parks, such as endangered birds (e.g., the Snowy Plover and other shorebirds). 2. Humans also have a right to enjoy at least some parts of the parks without having to interact with dogs. Not everyone enjoys dogs, or enjoys having dogs as part of their outdoor experience. 3. The existing leash

laws are widely ignored by dog owners, who seem to feel that their pets' need for off-leash time trumps any possible human wish or need not to have them around. 4. Professional dog walkers, with their large packs of dogs, are something of a plague already in parts of GGNRA. They dominate certain trails in the Presidio, for example, which is not necessarily a bad thing for people who like dogs, but can be unpleasant and even intimidating for non-dog people, or even those who do enjoy dogs in small numbers. The large packs of dogs also have a particularly strong negative impact on wildlife. 5. The fact that off-leash dogs have "traditionally" occupied many areas of GGNRA (Ocean Beach, Chrissy Field) does not imply that this tradition must continue. Such customs have to be constantly reevaluated in the light of new information about dog impacts on people and wildlife. The increasing numbers of dogs using these areas, for example, is in itself enough reason to reevaluate such practices.

Let's make sure that the needs and rights of both human beings and wildlife are considered on AT LEAST equal terms with those of dogs.

Correspondence ID: 2315 **Project:** 11759 **Document:** 38106
Received: Apr,27,2011 23:20:00
Correspondence Type: Web Form
Correspondence: No dogs off leash please. We no longer donate to Crissy Field or GGNR because of the dogs having ruined the beach for anyone else. It is not safe for children, the elderly, or anyone for that matter. Please do not allow dogs off leash. It is not fair. It is not safe.

Correspondence ID: 2316 **Project:** 11759 **Document:** 38106
Received: Apr,28,2011 10:58:17
Correspondence Type: Web Form
Correspondence: I support tight leash laws in the GGNRA and think that the preferred alternative creates too much off leash space in prime land. I think that other's comments on the recent article in the sfgate: "Supervisors growl at GGNRA dog proposal" shows that people feel the similar to the way I do. The vast majority of comments were for more leash laws and more enforcement. Therefore, it appears that the majority of people in SF want tighter leash laws and support the proposed dog management plan.

Here are some of the comments (not all consistent with my own opinion, but interesting and valid points.): 1. "Being that the City does NOT enforce the leash law in its own parks, having some dog-free federal property to go to will be a real relief." - Voice_of_reason

2. "That beach at Crissy is impossible to enjoy if you're not into masses of loose dogs. Most of the dog owners there do pick up the dog poo but what about all that dog pee? It is a lovely area that should be pleasant for all-not just dog owners." - Jarana

3. "As a dog owner who picks up after my dog, I blame a lot of this on irresponsible owners and dog walkers who don't bother picking up the poo, on sidewalks or in parks and open areas. It is just as disgusting to me as it is to non dog owners. Dog walkers should be licensed, as they are earning a good living, tax free, and a lot of them use our parks as public toilets and just walk away, leaving their mess behind." - Canthespam

4. "as a jogger for years, i have started carrying pepper spray after a couple bad incidents where dogs have run up to me growling and barking loudly. the owners in both cases basically told me to shove it when i complained to them. if your dog runs up to people without a leash, don't be surprised if they get a pepper blast to the face." - hela113

5. "I love to let my dog run off leash along the more remote parts of the beach and she is very obedient when called or told to stop. But dogs have destroyed Fort Funston's highlands in the last 15 years, and I have seen numerous people and animals terrorized by badly behaved off-leash dogs. Irresponsible dog owners are ruining the parks and city for everyone and reasonable limits need to be enforced. The GGNRA is right and the Supes, as usual, are just pandering." - citytrucker

6. "As a responsible dog owner, I applaud the GGNRA, Has anyone been to Ft. Funston of late? The place is overrun with dog poop! The flora and fauna are being trampled on incessantly. I cringe, every time I see a tourist go barefootin' on the beach. (Ocean Beach) All those dog owners (irresponsible) allowing their pets to major in Liberal Arts. Oy--the park rangers need to put up a sign. "Dog Poop Ahead." Can you say E.coli? Harvey Milk is rolling in his grave." - sabiane1776

7. "All you have to do is read recent stories about a woman killed by pit bulls or the article today concerning a dog attack in LA. How many people have to be killed or injured before we put muzzles on these dangerous animals. Put a leash on them at the very least. I know you owners thing they are people but they are not. They are barking, biting, peeing, pooping animals." - rnews

8. "i'm a dog lover... but if its not an approved dog park..dogs then need to be leashed or restricted. many dog owners just let their pets roam, dont pick up after them, do not have full control of their animal and not being very responsible." - SFGAL59

There were many more comments like this. On the other side the argument that was repeated over and over was that only 1% of the GGNRA is off-leash. In my opinion, 0% should be off leash in the GGNRA. So if it truly is 1%, I'd like to see it reduced by 1%. Secondly, this is inconsistent with my experience. If this is true that than 1% must be in SF and must be the most desirable land. This is not fair and it must change. I also wonder what percent is on leash. This should be no more than 3% and ideally also 0%.

Correspondence ID: 2317 **Project:** 11759 **Document:** 38106

Received: Apr,28,2011 14:46:31

Correspondence Type: Web Form

Correspondence: Please do not allow unleashed dogs on GGNRA property. I used to love to hike all over the GGNRA but have stopped because of the irresponsibility of too many dog owners. I've had huge, unleashed dogs run up to me and the owners threaten me when I yell, "Control your dog!". A friend was bitten while riding her bike.(The owner put the dog on leash briefly and then released it again) Another friend was bitten while hiking. Three people I know have had their small dogs bitten by other dogs (one of the dogs died and another almost did). Once, when visiting the Pacifica Pier, I had to cross the street to avoid a man who was allowing his dog to lunge and bark at people. Voice control is a joke. It doesn't work unless a dog is well-trained. Drivers have to have a license as do gun owners. Why do I have to accept the actions of an irresponsible dog owner with a dangerous dog who doesn't really care what happens to anyone else? The problem is that you have to make the same laws for poodles as for pitbulls trained to fight and kill.People don't get that. They think they should just do what ever they want, no matter the consequences on others. You have to think of everyone and everything, including children, the elderly and handicapped people for whom unleashed dogs can be deadly. You have to think of sea birds and other life too. I don't envy you this decision. Dog owners are often selfish and very vocal. They think of their own and their dogs' pleasure and don't really care what happens to other people, other dogs or wildlife. You have to think of these things. Please don't allow unleashed doge in the GGNRA.

Correspondence ID: 2318 **Project:** 11759 **Document:** 38106

Received: Apr,28,2011 15:45:49

Correspondence Type: Web Form

Correspondence: As a responsible dog owner and avid outdoors enthusiast, I understand the need to conserve our resources for future generations and to ensure our current actions do not adversely impact the environment. That said, certain alternatives presented here are somewhat drastic in their restrictions of voice control options. In a heavily urban area such as San Francisco and its bay,

where climate change, oil spills, supertankers and trash continue to take their toll on wildlife, it's hard to imagine an extremely adverse impact from canine companions if the current regulations continue. Again, while I certainly understand the sentiment of the plan, it seems to go too far in some of its formulations while not doing enough to address other environmental issues. That is, it singles out one group of NPS users who love the parks and want only the best for them while preserving a preservation/use balance.

If current regulations continue, the NPS could consider a day-use payment system to offset maintenance fees, if necessary, such as what's in place at Muir Woods. I would certainly pay a \$5 fee every time I used Crissy Field; professional dog walkers could be required to purchase permits as well, as one of the alternatives suggests.

If anything, I'd like to see a better balance. If some areas of GGNRA have to be closed to dogs/voice control, so be it. But for heavily urban areas like Ocean Beach and Crissy Field, I don't think the effects of shutting them down completely would be dramatic.

Thank you for considering my comments.

Aaron Ilika, Ph.D. San Francisco

Correspondence ID: 2319 **Project:** 11759 **Document:** 38106
Received: Apr,28,2011 16:04:11
Correspondence Type: Web Form
Correspondence: I am an active user of Crissy Field - I walk there, watch sailing & kiting, and drive thru pretty often. I ask you to keep it open to dogs, and let them run! Granted, there are some dog owners who need more training on how to control their pets while at the beach, but overall, everyone seems to be able to share the space & enjoy the great outdoors! We are an urban area, and the GGNRA is an amazing urban oasis - the priority really should be people, their kids, pets & desire to recreate! There are some beautiful restored areas, and spaces off limits to dogs/ etc for birds, let the rest of Crissy & the beach stay open to all. I don't have a dog, but have friends that do, so often walk with them. Overall, I've really very rarely seen badly behaved dogs. More often, I see a badly behaving child, or out of control tourist on a rental bike!

Thank you,

Correspondence ID: 2320 **Project:** 11759 **Document:** 38106
Received: Apr,28,2011 21:21:08
Correspondence Web Form

Type:

Correspondence: 1. Off-leash areas should be fenced. 2, 95% compliance should be required
3. Commercial dog-walking should not be permitted in GGNRA 4, At least some trails in SF should be entirely closed off to dogs.

Correspondence ID: 2321 **Project:** 11759 **Document:** 38106

Received: Apr,29,2011 01:52:03

Correspondence Type: Web Form

Correspondence: I would like to see data supporting the claim that there are increased problems with dogs in these areas.

Banning dogs or allowing on-leash dogs only in these wonderful parks punishes the majority of dogs and their owners because of the irresponsibility of a few owners. It would be like banning all cars because some drivers drive recklessly. Or banning all nightclubs because some people get drunk and violent. Fine the irresponsible people, not those who have well-behaved dogs and are doing nothing wrong. I hear the argument that there isn't the manpower to enforce the rules - well, the rangers are doing a pretty good job right now of enforcing the on-leash rules, and are very busy fining good people who are just minding their own business and taking their dog for a walk.

What alternatives are you offering to dog-walkers? Throwing a ball in a tiny dogpark? What is wrong with giving our dogs real exercise? Dogs who lack exercise are going to be less-well behaved, so any problems are going to get worse. I have been walking my dog at Fort Funston, and in various areas in Pacifica for the last 6 years. I have yet to witness a dog bite or attack anyone, or any serious misbehavior. I'm sure that problems occasionally happen, but is there real evidence of a major increase in the number of problems? Many dogs actually become more defensive - and therefore more aggressive - when they are on leash.

Make dog-walking more difficult, and fewer people will own dogs - leading to more strays and more dogs in shelters. There will be more unhealthy people who get less exercise. Responsible dog-owners will break the rules - it's just too important for them to be able to exercise their dogs properly. So the rangers will be fining these folks, when they could be taking care of other business, and just responding to occasional problems with irresponsible dog-owners.

These proposed restrictions just don't make sense. We live in one of the most beautiful areas in the world. Why should responsible dog-owners not be allowed to enjoy this with their pets?

Correspondence ID: 2322 **Project:** 11759 **Document:** 38106

Received: Apr,29,2011 10:20:21

Correspondence Type: Web Form

Correspondence: I oppose the GGNRA draft management plan and all DEIS alternatives. The revised dog management plan needs to address:

?the erroneously stated justifications for the need for action with unsubstantiated claims when the main justification for this plan is a NPS regulation that discriminates against all people with dogs and minimizes the urban "recreation" mandate of the GGNRA

?the use of "hypothetical" adverse impacts instead of actual dog impacts on the specific GGNRA park units when justifying eliminating most off-leash dog recreation and banning dogs on most of the trails designated for dog walking in the 1979 compromise

?the inadequate evaluation of GGNRA dog recreation on the health and well-being of people and on adjacent areas

?the dismissal of suggested alternatives based on unsubstantiated adverse impacts from dog recreation

?the misrepresentations of the legality of dog recreation in the GGNRA and the failure to formally recognize dog recreation as a valued, safe, and healthy recreation enjoyed by many people in America and the Bay Area

?the unfairness of a 75% compliance rule of banning all people with dogs based on violations by a few and banning all people with dogs with no evidence of significant impacts on the park or other park users

?the failure to maintain any of the traditional off-leash dog hiking trails in San Mateo County despite the long history of off-leash dog walking and the high recreation demand which is indicated by the lack of other alternatives in San Mateo County, the high rate of leash law violations, the high concentration of San Mateo County residents in San Francisco off-leash parks, etc.

Correspondence ID: 2323 **Project:** 11759 **Document:** 38106

Received: Apr,29,2011 12:52:37

Correspondence Type: Web Form

Correspondence: I am a dog owner myself, but I feel that dogs should be on leash at all times when on Park property. It is owners, not dogs, who are the problem. I have

witnessed many times dogs pooping on the beaches without their owners cleaning up after them, and chasing wildlife on paths. I realize that this penalizes the well behaved dogs, but it is a necessary price to pay.

Correspondence ID: 2324 **Project:** 11759 **Document:** 38106
Received: Apr,29,2011 16:47:25
Correspondence Type: Web Form
Correspondence: I agree with the thrust of the management plan to control dogs in the GGNRA. Many people do not want to interact with dogs and there should be many areas off-limits to dogs entirely. Please limit off-leash areas and provide clear boundaries for them. Compliance levels should be set very high, e.g. 90% or more. Do not submit to the militant dog owners who want no controls on their charges.

Correspondence ID: 2325 **Project:** 11759 **Document:** 38106
Received: Apr,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I agree with the thrust of the management plan to control dogs in the GGNRA. Many people do not want to interact with dogs and there should be many areas off-limits to dogs entirely. Please limit off-leash areas and provide clear boundaries for them. Compliance levels should be set very high, e.g. 90% or more. Do not submit to the militant dog owners who want no controls on their charges.

Correspondence ID: 2326 **Project:** 11759 **Document:** 38106
Received: Apr,29,2011 17:12:29
Correspondence Type: Web Form
Correspondence: Fort Funston Specifically

Families + dogs + kids + education (and clear instructions on how to take care of nature) = the next generation of caretakers of GGNRA.

Use the existing community to help implement your goals of caretaking

By spending the budget on clear boundaries and education in the long run you will reach your goal of land and wildlife protection now and for generations to come at minimal expense. Use the existing community to implement these goals. Who I am - We are a family with children and 2 dogs. My kids have grown up hiking Fort Funston several times a week since they were infants - 1 week of age. We love the fact that we can be

close to "real nature" - versus a manmade park.

It is my premise that children who grow up with dogs have learned to think about and love another species. Those who are lucky enough to have the opportunity to hike in nature with them learn to love nature and care for it starting with picking up poop and garbage, etc. As it is now ? There are very few places in all of America where our families (which include dogs) can be together in nature.

At Fort Funston there is a small amount of visible signage to explain the wildlife situation. There are a few old, broken, and sand covered fences to delineate protected wildlife boundaries. The lack of clarity has led to a disregard. However, I have seen this disregard extend to all people not just people with dogs. I don't think dogs are really the problem - it is people. I am convinced that most people don't intend to be malicious or malfeasant they just don't understand how their behaviors effect the big picture. They see acres of sandy open space with military remains and can't understand how someone thinks they are doing damage. So what if my dog and my kid dig in the sand?

There are very few programs for adults, families and children to educate them regarding protecting the native flora and fauna, - so tell them.

History, Residue, & Considerations ? Fort Funston lands were ravaged for national security and never fully restored. It would take a very large budget to do real native restoration. Various groups have subsequently claimed the land, which all make their mark and leave their residue. Horses leave poop and are hard on trails; hang-gliders erode the cliffs and may compete for airspace with certain birds; remote aircraft flyers traumatize birds, people and dogs with the loud noise and flight patterns; fisherman leave hooks, line and nets that are dangerous to sea creatures and birds; hikers often leave garbage; bicyclists erode trails; beach goers leave garbage, dig in the sand and cart off buckets of shells; joggers frighten feeding seabirds; dogs leave poop and pee, bark, dig in the sand, and chase feeding sea birds and ravens. Storms and tides leave tons of unnatural waste (ocean garbage dumping? Cruise ship dumping?) which are damaging to wildlife. (Waste water disposal is near the protected cliffs and in the allowable off-leash area of beach.) There have been homeless indigent camps which make lots of garbage leave poop and pee and have threatened the safety of park goers. (this population has almost disappeared with the rise of the dog walking public.) A Valuable Resource - The dog walking public is the largest and most consistent group that uses this space. Conversations between strangers happen because of their dogs. This is grass roots community building. Currently there is a fairly cohesive core group of frequent dog walking park users who see this area as their home and /or workspace and are socially responsible caretakers of the land. (Picking up garbage, poop, rescuing dogs,

and informing officials of wildlife in trouble, keeping out the riff raff and taking care of each other.) The GGNRA proposal for land management has made them more cohesive. Your extreme proposal stands to pit this group against your goals instead of for them. Use this valuable resource ? don't disregard it. If we can work together for the land we love this resource of community could ultimately manifest the vision you have for this land.

Education - Increase Signage and boundary delineations for protected areas

1. Explain what nature is vulnerable and needs our protection ? help us be even prouder of our coast than we already are! 2. Expect - People behaviors and actions? specific guidelines ie: pack it in pack it out, keep out of certain areas 3. Expect - Canine behaviors and actions? specifics ie: pack it out ? the poop, keep out of certain areas, no digging in certain spots 4. Expect - Other park users behaviors and actions with specific guidelines ? bicycle, horse, hang gliding, picnickers, dune surfers, fisherman, joggers, remote flyers, etc 5. Community Service Projects so the youth can have education credits for helping snowy plover, native plant restoration or other wildlife. 6. Self Monitoring ? each one teach one - self policing of expectations

There are very few programs for adults, families and children to educate them regarding protecting the native flora and fauna, - so tell them.

Keep non critical areas open to off leash, then use boundaries, education and community to protect the rest.

Thank you,

Diane Neighbor

PS - Why did you allow bulldozers on the cliffs during the spring nesting season of the snowy plover? They had all winter to do their structural repairs. That probably did more damage than a year's worth of dog traffic.

Correspondence ID: 2327 **Project:** 11759 **Document:** 38106
Received: Apr,29,2011 20:47:49
Correspondence Type: Web Form
Correspondence: April 28, 2011

TO: GGNRA

Re: Draft Dog Management Plan / Environmental Impact Statement
Compliance-Based Management Strategy

To whom it May Concern:

RE: Compliance Based Management Strategy:

I am a senior and I have been using the beaches at Crissy Field, Baker Beach, Muir Beach, Ocean Beach, and the Marin Headlands for recreation with my dogs for over 25 years. For much of this time, plenty of off-leash and on-leash opportunities have existed for us.

I currently have a labradoodle named Izzy who is in training to be a Animal Assisted Therapy dog. She and I spend countless hours walking along the beaches and trails. We recognize that there are more dogs and more people in the Bay Area these days and can even understand that it is important to designate specific lands for off-leash and on-leash recreation. We are closely following the GGNRA process for hearing input about the possible new dog management plan.

What concerns us is that after these hearings are over and agreements have been made about leash laws and areas, the proposed option gives the GGNRA the opportunity to change these agreements without a further hearing. How is this fair? If this is the case, what is the purpose of the comment period? This Compliance-Based Management Strategy makes the whole process seem like a mere formality to keep us dog people in line and to gain the control that will eventually mean more and more restrictions. How can we enter into this process in good faith with this kind of strategy in place?

We believe this strategy should be removed from any option that is finally adopted.

Sincerely,

JoAnne Tybinka Blasko Izzy Blasko

Correspondence ID: 2328 **Project:** 11759 **Document:** 38106
Received: Apr,29,2011 20:52:18
Correspondence Type: Web Form
Correspondence: April 29, 2011

To: GGNRA GGNRA Dog Management Plan Environmental Impact Statement

RE: Encouraging Cooperation; Developing an Alternative that Actually

Works

To Whom it May Concern:

I am a senior who finds great enjoyment recreating at Crissy Field, Baker Beach, Fort Mason, Ocean Beach, and the Marin Headlands with my dog,

I have spent time reading the GGNRA DOG DEIS and I am concerned about the tone of the report. It's not really a process for finding a way to provide a variety of high-quality visitor uses including areas where dogs are allowed or a way to discuss how to offer national park experiences to a large urban population.

Instead, the report seems to discourage cooperation between different park users and it fails to imagine that park user groups can work together to resolve problems when they come up. Instead, it could actually increase conflict between park users as more and more people and dogs are crammed into smaller and smaller spaces.

The report seems to be a way to circumvent the 1979 dog use policies or the 2005 ruling while bringing the dog people in line and eventually gaining full jurisdiction without the need for public input as to the way our Urban Park is used.

I believe the GGNRA should start all over and develop a new alternative, call it the A+ Alternative. This would be an alternative that will better serve the needs of the Bay Area. Instead of finding ways to restrict use, find ways to serve the population of the area.

You're right when you state that these parklands are our backyards (page 20). We do expect that public lands will be available for dog walking and other recreational activities because this has been the case over the years. Use by dog owners has not been "pushed" onto NPS lands. NPS has taken over management of lands that were already used for recreation by dog owners. Why not recognize this fact instead of fighting it? Why not try to find a way to actually serve this very urban population instead of a way to bring it in line with other national parks?

Sincerely,

Peter P. Blasko San Francisco resident for over 50 years

Correspondence ID: 2329 **Project:** 11759 **Document:** 38106
Received: Apr,29,2011 21:01:28
Correspondence Web Form

Type:

Correspondence: I believe the natural and scenic resources of the GGNRA should be preserved and maintained for all the people, not just for dog owners.

Correspondence ID: 2330 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,29,2011 21:39:18

Correspondence Type: Web Form

Type:

Correspondence: I have read the alternatives and think that your preferred alternative should be considered the most liberal, in terms of letting dogs run free in certain areas. I am in favor of leash control for all dogs, except in specific fenced areas. I think that we need to protect the wildlife, and pet dogs must be kept in control. "Voice control" is mostly a joke. When I visit parks, I often see owners calling to their dogs and the dogs ignore them. I -- and my children - - have been jumped on by dogs running around parks. We do not go to the parks to be jumped on by other people's dogs. I agree that commercial dog walkers should not be allowed in the parks. These businesses should manage the dogs in their own proprietary fenced areas, or they can walk them on the city streets.

Thank you for proposing that dogs will mostly be kept on leash. That is important for all the human visitors to the parks, and also for the wildlife.

Correspondence ID: 2331 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,29,2011 22:26:39

Correspondence Type: Web Form

Type:

Correspondence: I am very happy to see that the issue of dogs in the GG park is finally being addressed. I recently moved to Ocean Beach and was quite surprised to see the large number of dogs running free on the beach. I am a dog lover and have owned many dogs in the past but took the responsibility of ownership seriously which means following existing laws and making sure my pet does not disrupt others enjoyment or chase endangered wildlife. Unfortunately I have seen both infractions occur on almost a daily basis during my walks on the beach. It is too bad that a few repeat offenders are ruining a great resource for those law-abiding dog owners. I wholly endorse your plan to strictly limit off-leash dogs as this seems to be the only viable means to protect the Snowy Plover and other birds, meet the needs of many beachwalkers who do not appreciate a dog knocking them over, and still provide a large area for off leash use. I appreciate yo for taking this controversial issue on - especially in San Francisco!

Sincerely,

Kurt Kristensen

Correspondence ID: 2332 **Project:** 11759 **Document:** 38106

Received: Apr,29,2011 22:29:05

Correspondence Type: Web Form

Correspondence: Please don't give into the dog fascists. I don't use this word lightly. I own a dog myself, and I am shocked by the privileges that people think should accrue to their dogs. They don't seem to realize that many birds lead very difficult lives and that their continued existence is fragile in a world such as ours. They seem to resent that their dogs may be restricted in the least bit. I have had experiences with many dog owners who really don't think about the larger picture, about protecting wildlife and having a great variety of wildlife here for our grandchildren to enjoy.

Are there any snowy plovers in the animal shelters? No, I don't think so. Yet there are many, many dogs. We have a huge overpopulation of dogs on this planet, and we shouldn't be thinking in terms of making more room for them. My dog gets to run free only when I take her to Point Isabel, a few times a year. Yet I don't think she leads a miserable existence. She leads a fine existence with many pleasant walks in our neighborhood.

So please stand your ground and don't give into these unreasonable dog owners. There are many of us who want to protect wildlife at all costs. I think walking my dog on a leash is a small price to pay for the right of future generations to enjoy the birds that I enjoy today.

Thank you.

Correspondence ID: 2333 **Project:** 11759 **Document:** 38106

Received: Apr,29,2011 23:30:48

Correspondence Type: Web Form

Correspondence: I am afraid of all dogs, because all of them can potentially bite people. Dog owners are mostly of the belief that their dogs are tame. However, I was bitten by the dog of such an owner. Diane Whipple was killed by a dog whose owners did not understand they could not control their dogs off leash.

Dog walkers do what is forbidden by law. The way it is now, even in City parks where dogs must be kept on leash, the rule is not enforced, and dog walkers break the rule everyday. Yes, signs are clearly posted.

Dog walkers can be terribly rude. Upwards of 90% of dog owners I encounter tell me there's nothing to be afraid of, because their dogs are

gentle. (Less than 10% will actually hold their dogs.) Since I do not appreciate dogs running toward me, I always ask dog walkers to hold their unleashed dogs until I pass. When the dog walkers refuse to hold their dogs, the dogs may even charge at me; then, I would tell the approaching dog, "Sit" or "No," but sometimes I would have to run. One time, I told a passing dog walker (with her dog off leash) I had been bitten by a dog. In a rude tone, she said, "Oh. Get over it."

Dog walkers behave as though signs designating habitat restoration or other such sensitive areas do not apply to their dogs. This demonstrates a disregard for what nature existed here before hordes of humans and their pets came and a haughtiness than nature exists for their pleasure.

Because dog walkers are disobedient of laws and inconsiderate of people who do not like dogs, dog walking should be limited or forbidden. National parks should be welcoming places for everyone. Dog walkers have abused the law, individuals like me, and sensitive public spaces--enough already.

I will appreciate any rule that keeps commercial or other dog walking out of national parks--and enforcement of same. Thank you.

Correspondence ID: 2334 **Project:** 11759 **Document:** 38106

Received: Apr,30,2011 09:52:25

Correspondence Type: Web Form

Correspondence: Regarding the proposed Dog Management Plan in the Golden Gate National Recreation Area:

-At least some if not all areas and trails of the GGNRA should be off-limits to dogs, whether leashed or not. There is far too much sensitive wildlife and habitat in many regions of the Area which are already too heavily impacted by human activity (and the introduction of dogs IS a human activity.)

-The Area should be COMPLETELY closed to commercial dog-walking. Taxpayer support of the GGNRA should NOT subsidize any commercial activity, not even with the mitigation of licensing and fee payments.

-The recent resolution of the SF Board of Supervisors expressing opposition to dog regulation or prohibition in the GGNRA merely represents an effort by the City & County of SF to shove their own dog-generated problems in City parks and other City properties onto the shoulders of the NPS. As such, the Board resolution lacks merit and is an unconvincing argument. It is the City's responsibility to solve its own dog problems.

-75% compliance is FAR too low a goal. NPS should set a benchmark of at

least 95% compliance. I don't know what the current level of compliance is, but i am willing to guess it is well below 50%. It might be an interesting experiment to just start *ENFORCING* the regs currently in effect, and then re-examine the results to determine whether in fact we really need any additional strictures.

thank you

chris witt

Correspondence ID: 2335 **Project:** 11759 **Document:** 38106

Received: Apr,30,2011 10:34:46

Correspondence Type: Web Form

Correspondence: I'm shocked at the idea of using the GGNRA as a dog's toilet! Commercial dog walkers are often the worse offenders of the pick up rule. Having so many dogs to manage, the ones off leash get away and poop without them even knowing. Also, having the pack mentality, dogs are more inclined to harrass the birds if one starts chasing. There are so many of the herding dogs, and dog owners act like its not thier fault, it's the dogs breeding!.

I resent that dogs bound up to me, sometimes almost bowling me over because their owner throws a ball in my direction.I have a small dog, and the large dogs often surround and intimidate her. Who knows if these dogs are friendly? Dogs can get out of hand if there is a ball or treat at stake.

Ironically, when the city is trying to increase revenues, there is no proposal for a dog walker's license, and a limit of how many dogs per person. Why isn't dog licenses required anyway? All owners should be required to pay a decent yearly fee-the vet should collect it before giving them the yearly shots. At least \$25 per dog per year, a dog does a lot of damage enviromentally. A city that requires fresh water and food daily certainly should demand owners keep current on the dog's shots.

Since Ft. Funston is already a pit, how about dogs there, only? Or, some parks are rarely used, like Juniper Sero, Sweeney Ridge. Why do the dogs get the nicest places? People can't enjoy Ocean Beach or Chrissy field in peace, not to mention the birds. BTW, I have never seen any dog owner make sure thier dog did not go thru the protected areas, and they are rude and don't care if you let them know.

Dog owners have shown great ability to curry favor with elected officials, but do they ever have a code of ethics for themselves or show up for clean up or restore days?*

I am a dog owner, a bird watcher, an environmentalist. I vote, and I am fed up with the GGNRA going to the dogs!

Correspondence ID: 2336 **Project:** 11759 **Document:** 38106

Received: Apr,30,2011 17:53:39

Correspondence Type: Web Form

Correspondence: I am writing to support all regulations that dogs be restricted from sensitive wildlife areas at GGNRA. As a dog owner, I am not against dogs. But the natural wildlife needs protection from these dogs which frighten birds and compromise the ecosystem. Off-leash areas should be fenced. Commercial dog-walking should not be permitted. Some trails should be entirely closed to dogs. There should be 95 percent compliance with National Parks proposed requirements. Dogs should be heavily restricted and only allowed in determined areas.

In short the parks should be maintained as safe and accessible so that precious species can survive. Thank you.

Correspondence ID: 2337 **Project:** 11759 **Document:** 38106

Received: Apr,30,2011 21:05:24

Correspondence Type: Web Form

Correspondence: I agree that we need to revisit the dog management rules within GGNRA.

At this moment, there are virtually no parks in San Francisco that I've been in that don't have dogs running off-leash. I see off-leash dogs everywhere, and that includes the Wildlife Protection Area at Crissy Field, where the endangered Snowy Plover is trying to hang on. It includes places where children are playing--some of whom may be afraid of dogs--or people are trying to eat. It includes "protected" natural habitats, breeding ground for rare birds, and many other areas that might quite reasonably be better off with no off-leash dogs.

I think the GGNRA isn't going far enough. We have a terrific number of excellent places to walk and run dogs in this city. And we have almost no places where endangered wildlife can have a good chance at life.

I hope that we could see:

1. 100% compliance with signage and regulations.
2. Licenses for professional dog walkers.
3. Increased ticketing for noncompliance with regulations.
4. More signage that explains the restrictions and points dog

owners to the dog areas.

Thank you for your efforts.

Kimberly Jannarone

Correspondence ID: 2338 **Project:** 11759 **Document:** 38106

Received: May,01,2011 00:57:08

Correspondence Type: Web Form

Correspondence: Although your mission seems to be preserve native flora and fauna, this proposal goes into quite a bit of detail about canine incidents and behaviors. This is what I choose to comment on. Fort Funston -

I have been a 5 times a week visitor to Fort Funston off leash areas for over 7 years. In that time I have only witnessed 2 dog fights in which skin was broken. This is so amazing because we are talking about hundreds of dogs daily that are getting along amicably. Fort Funston dog community could be called the United Nations of people and dogs. I see people of many ethnicities and language with dogs of many sizes and breeds not only avoiding conflict but having a good time and visiting building friendships!

During one visit about 3 years ago I ran into some students from Japan that were filming and doing an article on the place because it is unique in its people dog diversity and it wild space beauty. We could have a national treasure in the way the land is being used - not just the beauty of the land.

Please find a way to continue off leash open space. Part of the reason it works is because the space is so large. Dogs of different temprements or sizes can find their own place to be. Most socialological studies show that crowding causes conflict in most any species. Your extreme proposal will cause crowding in the small remaining area. I am fearful that conflict will arise where nearly none existed before.

This park is very heavily used by the San Francisco and Peninsula population as well as outlying Bay Area regions. On good weather weekends parking lots are full to capacity and if you speak with people they have come from as far south as Santa Cruz and San Jose, as far North as Santa Rosa and as far east as Livermore. Most have come just to walk their dogs in a safe place where dogs have lots of room to run. We need this place. Please find a way to let us stay.

Davo Leeds

Correspondence 2339 **Project:** 11759 **Document:** 38106

ID:

Received: May,01,2011 10:57:52

Correspondence Type: Web Form

Type:

Correspondence: There are just too many dogs in urban areas, and too many irresponsible dog owners everywhere. Please do what you can to prevent dogs from our parks and public areas for those of us who pay taxes and fees to have a nice walk in the park, not stepping in smelly dog poop, nor being hassled by rowdy, mean dogs that run into and bump up against us on the trails. Thank you very much, C. Heimstadt

Correspondence ID: 2340 **Project:** 11759 **Document:** 38106

ID:

Received: May,01,2011 11:07:08

Correspondence Type: Web Form

Type:

Correspondence: Thank you for understanding the needs of our community. My daughter is 5 years old and I began taking her to Crissy Field at the age of 1. I stopped at the age of 2. The first problem with Crissy Field is that the overwhelming smell of dog urine is nauseating and disgusting. Why would we want our children digging in this sand? The next issue is that the dogs were constantly running through my picnic blanket and sniffing my daughter. With the issues we've had in this town, we all know how scary and dangerous it can be when a big dog gets exciting around a small child.

Will the new regulations be enforced? Last summer we tried to go to the 'no dog' area near the Warming Hut. Well, I was not surprised to find dogs there! Dog owners have no respect for rules. When I told an owner that dogs were not allowed, he said that he couldn't control the dog and it will run where it will run.

Also, contrary to what dog owners are saying about children and bikers ruining endangered species areas, the truth is that I've seen many dogs inside the fenced areas.

Please go forward with your plan! Thank you for letting me comment.

Susan Stone

Correspondence ID: 2341 **Project:** 11759 **Document:** 38106

ID:

Received: May,01,2011 13:08:18

Correspondence Type: Web Form

Type:

Correspondence: If our dogs aren't able to have areas where they can run freely and swim, they won't be able to burn off the energy they need to be well mannered

animals. Due to injuries, I can't go run my dog to tire her out, but I can take her to the beach at Crissy Field and let her run up and down the beach playing with other dogs. We go to that beach at least once a week with our dog, year round. It's a meet up place for people with dogs. We can enjoy the beautiful scenery while our dogs get a chance to run and be free. We go there rain or shine, fog or sun, to let our dogs run. 95% of the year the only people at the beach are people with dogs. It's not fair that the few days of warmth and sun when people without dogs go to the beach would ruin the rest of the year for the many dog owners in the bay area. People come from all over the bay area to bring their dogs to the beach to play with other dogs.

Correspondence ID: 2342 **Project:** 11759 **Document:** 38106
Received: May,01,2011 14:07:51
Correspondence Type: Web Form
Correspondence: I have read the Golden Gate Recreation Area Plan/DEIS Executive Summary and Chapter 2 which details all of the management options for GGNRA. In regards to the Crissy Field site I respectfully submit that Alternative E is the best compromise solution for this site. The open grassy area of air field should remain available to dogs under voice control. I do not see where restricting this area is justified.

Correspondence ID: 2343 **Project:** 11759 **Document:** 38106
Received: May,01,2011 15:25:51
Correspondence Type: Web Form
Correspondence: Please keep the GGNRA open to off-leash dogs!! As a 12-year resident of San Francisco, I can honestly say that going to Fort Funston and Crissy Field with my dog is one of my favorite things to do here in my city. It's safe to say that they are also my dog's favorite places too! This issue is not just about dogs, but about the quality of life for the pet owners that get so much enjoyment out of visiting the GGNRA. Please consider alternatives to banning off-leash dogs.

Correspondence ID: 2344 **Project:** 11759 **Document:** 38106
Received: May,01,2011 15:59:29
Correspondence Type: Web Form
Correspondence: I have been walking my dog, both on-leash and off-leash on the Rancho Corral de Tierra lands for 7 years (I am a relative new-comer to walking there). I have friends that have successfully walked their dogs there for 10+ years. We encounter many dogs while walking, some on-leash and some off-leash but we have some 'rules of road' when walking our dogs making it

a safe place for all that go there. Not allowing dogs in this area will greatly impact my life and my dog's life as we walk there almost every day of the week, sometimes twice a day. We both love being able exercise freely.

I support Alternative E where "new lands with existing off leash use before acquisition may also be considered for voice and sight control in the future.."

Correspondence ID: 2345 **Project:** 11759 **Document:** 38106

Received: May,01,2011 17:35:47

Correspondence Type: Web Form

Correspondence: To the National Park Service,

Dogs are a threat to the natural resources of the Golden Gate National Recreation Area. Ocean Beach is one of many areas in our park system that is spoiled by so many dogs. The beaches in Southern California are clean, comfortable and safe. Our family with young children can play on sand that is not contaminated by dog waste. They are safe from dogs. No dogs are permitted. It is lovely. Why are dogs permitted when they clearly harm the

Ocean Beach always has off leash dogs. Crissy Field always has off leash dogs, Golden Gate Park always has off leash dogs, Fort Funston, more off leash dogs. The last two times I attempted bird watching at Fort Funston I watched as one woman got out of her mini-van with 12 dogs - all off leash. While 12 is probably not typical, most dog walkers adhere to the rules, it happens. And there are other violations. I long ago gave up walking at Crissy Field. We no longer take visiting friends and family to most parts of the GGNRA. Last time I walked on JFK and throughout several trails for an hour and a half I counted 57 dogs. The time before that around Chain of Lakes I counted 63 in a two hour period. Now I don't go.

Urine drenched sand, fecal debris is not how the GGNRA can protect the environmental integrity and beauty of our shoreline. It is harmful to wildlife and people. The Dog Management Draft Plan does not propose enough protection.

Please, expand the vision. Dogs OFF the beach, better enforcement of leash laws, MORE NO DOGS PERMITTED places for people to walk, relax, bird, play and enjoy our natural resource. No dogs in the National Parks. Enforce it and make it happen. Thank you, Janet Harrison

Correspondence ID: 2346 **Project:** 11759 **Document:** 38106

Received: May,01,2011 00:00:00

Correspondence Type: Web Form
Correspondence: Comment ID: 484302-38106/2345

Sorry that part of one sentence in this comment got deleted. It should say:
harm the environment.

Janet Harrison

Correspondence ID: 2347 **Project:** 11759 **Document:** 38106

Received: May,01,2011 21:19:53

Correspondence Type: Web Form

Correspondence: Please keep Crissy Field as open as it is now for dogs. I've written before and nothing I've read or seen has caused me to change my view that dogs should be welcome there. I remember taking my grandchildren (2 boys who were skittish around dogs, perhaps even scared) there some years ago. They watched as the dogs played with each other, played in the water, romped on the shore with their human and dog friends, and then the children settled comfortably into their child activities. Neither were detrimental to people, animals, birds, the environment. One might as well keep children out of the same areas you suggest keeping dogs out of.

Correspondence ID: 2348 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I strongly support the Dog Management Draft Plan. Our national parks' foremost mission is conservation and there are endangered species at risk in San Francisco if we do not act.

I believe:

- All off-leash dog areas should be fenced for the protection of other park visitors and dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.

- There should be a limit of 3 dogs per person. It is not appropriate for the Park Service to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time.

- Leash and voice control requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules.

- The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The Park Service should not be creating a system that expects and tolerates failure by 25% of the dog walkers. Golden Gate Audubon recommends a goal of 95% compliance with leash and voice control requirements.

Correspondence ID: 2349 **Project:** 11759 **Document:** 38106
Received: May,02,2011 08:26:37
Correspondence Type: Web Form
Correspondence: One of the reasons I love living in San Francisco is the availability of parks where my dogs can run free without a leash. Please don not change that.

Correspondence ID: 2350 **Project:** 11759 **Document:** 38106
Received: May,02,2011 10:16:43
Correspondence Type: Web Form
Correspondence: I am a home owner in Pacific Heights and we walk our dog in the parks daily! On the weekends, we love to take Biscuit to GGP and to the beach and other parks so that he can play off leash with other dogs. Not only is this good for making our little guy less aggressive, but any dog book that you read says that this is a vital part of the socialization process for the animals. In San Francisco, people, like us, consider their dogs to be their children and family memebers. This is one of the reasons that we decided to buy in San Francisco 5 years ago, because the city is so accepting of dogs and open to them being everywhere. Very European! Now, that seems to be changing into a political, closed minded agenda to end the freedom and charm that has brought so many people, like us to the city. Imagine not allowing your kindergartner to run and play on a playground unless they were on a leash. Do you think that would help them to grow up socially adjusted? Of course not! But,this is is what the city is proposing to our furry children! I feel very strongly that the city should reconsider their position on these leash laws...or else they may lose valuable tax dollars from people like us, who are less likely to stay in the city if there is no place for our 'kids' to roam free. We might as well move to the East Bay and buy a house with a yard.

Correspondence ID: 2351 **Project:** 11759 **Document:** 38106
Received: May,02,2011 11:20:39
Correspondence Type: Web Form

Type:

Correspondence: you're org is the equivalent of being dog nazi's. don't you have better things to do than this. with all the bums and crystal meth addicts poisoning our park and you are doing this. your org is pathetic and endemic of the crisis facing our city. the most enjoyable sight @ crissy are the wonderful dogs running on the beach and playing in the water. you should all be ashamed of yourselves and we will do everything within our legal system to see that you who are responsible for this are removed from your jobs. max

Correspondence ID: 2352 **Project:** 11759 **Document:** 38106

Received: May,02,2011 13:11:30

Correspondence Type: Web Form

Correspondence: It is a relatively inexpensive pleasure we seek, to play ball with our dogs at Crissy Field. Kevin Brown

Correspondence ID: 2353 **Project:** 11759 **Document:** 38106

Received: May,02,2011 13:46:03

Correspondence Type: Web Form

Correspondence: I appreciate the enormous amount of work that the GGRNA staff and volunteers have done to create this draft dog management plan and to communicate with and educate dog owners and other members of the public.

I strongly urge that the NPS adopt option D for all new lands which may be acquired or managed by GGNRA, as recommended in the preferred alternative.

I would like to see the NPS adopt the preferred alternative for all others areas under consideration as well, with one exception: there should be no exceptions to the three dogs per person limit, for either commercial or individual dog walkers, in the ROLAs. One person cannot reasonably be expected to keep more than three dogs under sight and voice control; allowing this even by permit is likely to cause the ROLAs to be revoked under the compliance procedures outlined in the draft document. It would probably be simpler to maintain the three-dog limit throughout the dog-walking areas, rather than allowing six dogs in the on-leash areas and only three in the ROLAs, but staff knows much better than I whether that is the case.

Thank you.

Martha Benioff

Correspondence ID: 2354 **Project:** 11759 **Document:** 38106

Received: May,02,2011 14:20:43

Correspondence Type: Web Form

Correspondence: Dear NPS, I'm a 3-year resident of the Presidio, a 14-year resident of San Francisco and a lifelong resident of the Bay Area. I've used GGNRA areas to walk and run with my dog for 4 years, and we visit GGNRA areas every single day, given that we basically live in them. But we visit not only the GGNRA lands in our neighborhood, but also Fort Funston, Ocean Beach, Rodeo Beach, Muir Beach and many of the trails in the bluffs and hills above those places. I can't begin to imagine the huge negative impact the Preferred Alternative will have on my enjoyment of these areas. My dog is very active and requires at least some off-leash running to enjoy life. To keep him on-leash *all* the time, or to be forced to drive to small, crowded, enclosed off-leash areas in the SF city parks would seriously curtail my enjoyment of the GGNRA recreation areas as well as my dog's health and well-being. I believe that restricting and prohibiting off-leash dogs in so many GGRNA lands is not the solution to the perceived problem--rather, if there are issues with dogs on these lands (which I don't agree is the case), then the solution is better enforcement of current rules. My experience is that the vast majority of dog owners are responsible people who pick up after their pets and follow the rules. I have never witnessed anyone's dog chasing snowy plovers or harassing wildlife in any of the GGNRA lands that I have visited. The density of people in the surrounding cities have a far larger impact on wildlife in the GGNRA than does the occasional off-leash dog. Please count this letter as a vote against the Preferred Alternative.

Correspondence ID: 2355 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: 2 general comments. Many people come to the parks to exercise and recreate with their dogs. If you curtail spaces for such recreation, you will be denying citizens their choice to freely enjoy the park as they want. My husband and I walk Chrissy Field at least once every week and part of our enjoyment is being around and observing the dogs and their owners. 2nd comment: just because other national parks have a particular set of rules re dogs is no reason to force the same rules on an area which has a long history of dog-citizen usage. In fact, many of the people who count on the open space for themselves and their dogs to run freely, esp.the beaches, have been going to those places since before many of the staff of the GGNRA were born. There is a long tradition of this usage. None of the proposed plans is necessary to continue dog/citizens enjoyment of the national park. Please do

not adopt any of the plans.

Correspondence ID: 2356 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you!

Correspondence ID: 2357 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Ladies and Gentlemen,

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and

other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you,

Alice Neuhauser

Correspondence ID: 2358 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: please protect endangered species.

Correspondence ID: 2359 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:07:34
Correspondence Type: Web Form
Correspondence: Please take all measures to protect wildlife in the park because the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Correspondence ID: 2360 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:08:04
Correspondence Type: Web Form
Correspondence: Dear NPS,

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts

on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Jonathan Berke

Correspondence ID: 2361 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2362 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

We need to make adjustments such as:

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for listening, Kenna S.

Correspondence ID: 2363 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:10:24

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2364 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:11:18

Correspondence Type: Web Form

Correspondence: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you.

Correspondence ID: 2365 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:11:39
Correspondence Type: Web Form
Correspondence: all creatures should be protected

Correspondence ID: 2366 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: -- The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2367 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife,

and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2368 **Project:** 11759 **Document:** 38106

Received:

May,02,2011 18:12:47

Correspondence Type:

Web Form

Correspondence:

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Correspondence ID: 2369 **Project:** 11759 **Document:** 38106

Received:

May,02,2011 00:00:00

Correspondence Type:

Web Form

Correspondence:

As a California resident, I appreciate that the park's mission is to protect the natural and cultural resources, not allow recreational activities to undermine it.

Part of the reason I appreciate the park service is the preservation of endangered species native to California. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the

compliance rate should be 95%, not 75% as outlined.

As someone without a dog, I sometimes find the presence of dogs somewhat threatening. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

It would help with my issues if the park service were to require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs and limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2370 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:16:51

Correspondence Type: Web Form

Correspondence: There were clear signs right now in the various beaches that are being violated. I would like stricter measures to be taken to enforce the new regulations. I am all for certain areas for pet recreation. But please enforce the rules, appearing lax only makes things worse.

Correspondence ID: 2371 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As a frequent Bay Area visitor and past resident, I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2372 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:17:32
Correspondence Type: Web Form
Correspondence: PROTECTING ANY AND ALL WILDLIFE IN THE US PARKS AND AREAS IS MOST IMPORTANT

Correspondence ID: 2373 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: We need to achieve a balance between protecting endangered species and allowing for recreational uses. I have included the talking points below, because I support them. At the same time, my hope is that, if possible, designated, appropriate and pleasant off-leash areas can be provided for dogs.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2374 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

There is an urgent need for dog-free areas on the beach. I urge you to consider the greater priority of protecting wild species from domestic pets off leash.

Thanks for your attention.

Correspondence ID: 2375 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2376 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:19:43
Correspondence Type: Web Form
Correspondence: I think that dogs ought to continue to be allowed in the GGNRA. I have never experienced problems with dogs there, and I think that responsible dog ownership ought to be rewarded, not punished.

Correspondence ID: 2377 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2378 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Our national parks were established to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

The park should require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

-The park should limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you

Mr and Mrs James Denison

Correspondence ID: 2379 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

--There are several beaches in Santa Cruz County, CA that almost lost their ability to function as Snowy Plover nesting habitats. Restricting beach access, including off-leash dogs, resulted in the restoration of the Snowy Plover habitat and a resurgence of their numbers.

Correspondence ID: 2380 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection

from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2381 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2382 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Some thoughts on the proposed dog management plan:

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection

from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation

I believe the plan should require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

I support limiting off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2383 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:24:54

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Our family has enjoyed the park on frequent occasions, and public use of our natural and cultural resources is always important. However, the preservation of those resources and their wildlife should be the most important consideration.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to have large enclosed areas to protect park users, wildlife, and other dogs. I am a big fan of off-leash recreation for my dogs. However, I believe that the times and areas should be regulated for the protection of all users. We need to limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Sharron Thomas

Correspondence ID: 2384 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, recreation is secondary, and should not undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2385 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:25:35
Correspondence Type: Web Form
Correspondence: I'm very concerned and confused at the outlined protection level of 75% in the plan. I believe a level of 95% would already be rather lax. My understanding is that the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--The park has a diverse user community and they should be better accommodated, by offering more than one trail and more beach areas free from dog recreation.

I believe that all off-leash areas should be enclosed to protect park users, wildlife, and other dogs and that off-leash recreation should be limited to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2386 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00

Correspondence Type: Web Form
Correspondence: Help protect our parks, to make it safe for the endangered and threatened species in the continental U.S

Correspondence ID: 2387 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined! The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Although some efforts have been made to help protect these species and other protected wildlife, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. Additionally, the National Park Service should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by:

--Offering more than one trail and more beach areas free from dog recreation. --Requiring all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. --Limiting off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Please regulate recreation in the Golden Gate National Recreation Area, creating a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive. Thank you.

Correspondence ID: 2388 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park

experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Correspondence ID: 2389 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2390 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:27:36
Correspondence Type: Web Form
Correspondence: A number of organizations are advocating great restrictions to off-leash dog walking. They forget, it seems to me, that the GGNRA was created with a MANDATE and a CONTRACT, to preserve traditional uses. Off-leash dog walking is one of them.

It is a special park, with unusual origins and unusual requirements.

For me, as a senior, my only access to this traditional use is at GGNRA. Please help the people who want to take away this traditional use to realize that they must balance their ideologies with human uses.

They will tell you it is not possible. In the great tradition of Prohibition, they want to improve us by controlling us. Please, just gently fan them and send them home, lest they make adversaries of those who now wish the GGNRA well.

Thank you

Birrell Walsh

Correspondence ID: 2391 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:27:42
Correspondence Type: Web Form
Correspondence: Please protect the animals of the park, even if that means regulating dog walkers. We all love dogs but they can be destructive, too.

Correspondence ID: 2392 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear NPS--

I realize it is very difficult to balance the oft-time conflicting missions of recreation and conservation. However, more and more I see the louder voices of those desiring more and more recreation opportunities in habitats that are crucial to sensitive and endangered species.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. IN ADDITION TO THE MEASURES LISTED BELOW, THIS COULD BE OFFSET BY DEVELOPMENT OF SPECIFIC RECREATION AREAS THAT ARE LOCATED IN LESS SENSITIVE HABITATS.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Paul Brust

Correspondence ID: 2393 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:28:35
Correspondence Type: Web Form
Correspondence: Why even have a park if you're not allowing it to fulfill its mission of protecting our natural resources? The idea of protecting wildlife habitat only 75% of the time is like the city ordaining that wild dogs should be able to run through your home, eat, destroy things and defecate wherever they please 25% of the time.

Please require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Please limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2394 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:29:18
Correspondence Type: Web Form
Correspondence: I am both a strong supporter of the Golden Gate National Parks Conservancy and a dog owner who enjoys some of the designated off-leash areas of the GGNRA with my dogs. While I do not believe that we should put endangered species at risk, I do believe that there is a way to regulate

recreational use that would provide designated off-leash areas that do not threaten wildlife habitat and that a flat ban is an overreaction to the issue.

Currently, there is some regulation in the GGNRA that does prohibit dogs entirely or dogs off leash in specified areas. This is a perfectly appropriate regulation for sensitive habitat area, but I don't find it necessary to ban dogs in every place in the park, particularly in areas where there is urban infrastructure already in place that would theoretically not threaten wildlife either, otherwise it would not be there (e.g. parking lots, picnic areas, bathroom facilities, build structures, walking paths, etc.).

GGNRA is an urbanized park that is both an anomaly of other national parks as well as a pioneer in many regards. I would hope that innovative thinking on how to reconcile different uses of the urban recreation area should be an objective of the GGNRA in the same way it has made financial sustainability an objective, as an example. It has heavily used roadways that run through the territory, millions of human users, a variety of uses within the park, and I have the utmost confidence that the GGNRA staff can resolve the dog issues without banning dogs altogether, whether it be through creating additional funding streams that would help mitigate the impact by fencing off fragile areas, issuing tickets to dog owners who do not follow the rules, or to alternate days of use of specific areas to decrease overall use and impact.

In my experience as a dog owner, I find many people who walk their dogs in the GGNRA on a regular basis are often the people who tend to pick up human garbage on the ground and maintain dog congregating areas (e.g. water bowl areas).

While I certainly do not seek to negatively impact the natural environment and habitat of any species, the mere existence of dogs and humans absolutely has an impact so that impact should be regulated in some sensible way. I have been pleased to watch the numerous restoration projects in the GGNRA over the years and feel as though there has been quite a bit of thought and planning that has gone into making it more sustainable both financially and environmentally, but as highly varied asset in the area, I hope that a reasonable compromised solution can be found.

| | | | |
|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 2395 | Project: 11759 | Document: 38106 |
| Received: | May,02,2011 18:29:21 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I would appreciate anything you could do to protect the little wildlife we have left in and around our cities. | | |

Correspondence ID: 2396 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:29:47
Correspondence Type: Web Form
Correspondence: Please protect the unique and vulnerable species of animals and plants in Golden Gate Park. This is a unique oasis in the midst of the urban madness; exactly what John Muir, and Theodore Roosevelt planned the National Park System for!

Michael Goode

Correspondence ID: 2397 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:30:17
Correspondence Type: Web Form
Correspondence: Protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2398 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:30:21
Correspondence Type: Web Form
Correspondence: No offense to doggies, but they are plentiful (in fact overpopulated) and thier recreation does not take precedence to the welfare of endangered species.

One would think that dog owners, presumably animal lovers, would be

more responsible and sensitive to wildlife.

I would think that there are other leash free parks that do not imperil endangered species.

At the very least an area should be fence off, and within this area only, would dogs be able to go leash free. In addition this would make a contained area for dog waste, thus making it easier for clean-up.

Correspondence ID: 2399 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: to whom this may concern,

i believe NPS and GGPark's mission is to protect the natural and cultural resources, not allow recreation to undermine it. please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. i suggest all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. definitely limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

thank you for your attention.

sincerely, -kevin tsui

Correspondence ID: 2400 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:31:21

Correspondence Type: Web Form

Correspondence: The Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. The park is home to endangered and threatened species!

The park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--Limit recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Please help to give imperiled species a chance to survive in Golden Gate National Recreation Area.

"The assumption that animals are without rights, and the illusion that our treatment of them has no moral significance, is a positively outrageous example of Western crudity and barbarity. Universal compassion is the only guarantee of morality." --Arthur Shopenhauer

Correspondence ID: 2401 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:31:33

Correspondence Type: Web Form

Correspondence: While the comments below are copy-pasted, I have seen the harm done by off-leash dogs in sensitive coastal and/or bird habitats within protected zones in Hawai'i and New Zealand, and it is imperative that Golden Gate, one of my most cherished places, is protected as much as possible. We have already lost so much biodiversity- let's not let laziness compromise what's left any further.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2402 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:32:32

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Correspondence ID: 2403 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:32:53

Correspondence Type: Web Form

Correspondence: Please care for our planet by assuring that all species have a place that is safe and supportive.

Correspondence ID: 2404 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:33:05

Correspondence Type: Web Form

Correspondence: Please use common sense and great consideration before upsetting the habitats, which are becoming fewer and fewer, of our country's dwindling wildlife .

Thank you... Terrell Rodefer

Correspondence ID: 2405 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2406 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:34:22
Correspondence Type: Web Form
Correspondence: The Golden Gate Recreation area must be kept sacred as wildlife habitat. Your job is to protect wildlife, not open up critical habitat to human destruction. Please immediately keep this area off-limits to any development, and pristine as a habitat. Thank you for doing the right thing.

Correspondence ID: 2407 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:34:26
Correspondence Type: Web Form
Correspondence: PLEASE===PLEASE===PLEASE DO THE RIGHT THING AND PROTECT THESE SPECIAL SPECIES.

Correspondence ID: 2408 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:35:09
Correspondence Type: Web Form

Correspondence: I believe that dogs contribute to one's overall health. When one lives with a dog, regular exercise is required which benefits the human as well. For dogs to stay healthy, they need to run. When I lived in SF, I frequently visited Fort Funston with my dog and it benefited both of us, mentally and physically.

It sounds like the controversy has stemmed from some irresponsible dog owners who don't follow the basic rules of keeping one's dog under voice control, picking up after them and respecting the multi use aspect of our park system. I don't think that restricting dog access answers that problem. If someone is not going to pick up after their dog, requiring that dog to be on leash won't change that. And yet, keeping that dog on leash will lead other negative behaviors. A common problem with on leash dogs is leash aggression - this is a problem that disappears when dogs are off leash. I don't think the answer is to require leashes or ban dogs completely.

As a taxpayer and a supporter of our park system, I would like to see park police go after abusers of the public parks, whether it be a pet owner who does not control or pick up after the pet or a teenage vandal who is defacing park property. Those two examples fall into the same category in my opinion. Would you ban all teenagers from public parks because most of the vandals are teenagers? Of course not. So why would you impose restrictions on dogs when most of them are under control and their owners are following the rules?

Correspondence ID: 2409 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:35:28

Correspondence Type: Web Form

Correspondence: -The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts

on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2410 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:37:22
Correspondence Type: Web Form
Correspondence: Unleashed dogs should not be allowed in our national parks. Please protect our precious wildlife from the impact of human and pet activities.

Correspondence ID: 2411 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park should require a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. Since protection is agreed to be necessary, complete compliance is too! The park's mission is to protect the natural and cultural resources, not allow recreation to undermine any of it.

Better accommodation should be created for diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Off-leash recreation should be limited to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2412 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:40:37
Correspondence Type: Web Form
Correspondence: Protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Correspondence ID: 2413 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:40:59
Correspondence Type: Web Form
Correspondence: Please take action.

Correspondence ID: 2414 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:42:06

Correspondence Web Form

Type:

Correspondence: We have enough dogs in the world, and they have entire dog parks, and dog runs dedicated to them. I was born and raised in San Francisco and I believe in my heart Golden Gate Park must be kept sacred for wildlife. Wildlife habitats are shrinking due to human invasion. I am someone who NEEDS nature and wildlife to be happy, healthy and vital. Dogs don't fill that need.

Correspondence ID: 2415 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2416 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 18:44:42

Correspondence Web Form

Type:

Correspondence: I am writing as a biologist, an environmental attorney, and a long-time dog owner to comment on the proposed dog management plan for the Golden Gate NRA. As a dog owner, I am sympathetic to the need of pet owners for places where they can run leash-free. On the other hand, as a biologist and an environmental attorney, I am keenly aware of the limited remaining space available for natural habitat, especially in the highly-urbanized S.F. Bay Area. Given that a certain amount of balancing may be needed, it seems far easier to find alternative sites for off-leash dog play areas than it is to find alternative habitat, especially for rare, endangered, threatened, and other federally-protected species. These species have highly-specific habitat

needs, while dogs and their owners can use a variety of open space options.

Given this disparity, it seems obvious to me that the needs of the natural environment, and especially of species and ecosystems with limited available habitat, must come first.

While I appreciate that the NPS is developing rules for dogs and other pets in the GGNRA, it is crucial that these rules be enforceable and enforced. From that standpoint, the NPS' proposed 75% compliance rate is unacceptably low. A species such as the Western Snowy Plover, that may migrate thousands of miles, cannot afford to be chased by a dog even once. While there may be ecologically less-sensitive parts of GGNRA where less stringent enforcement standards may be acceptable, important habitat areas need to have strong rules and stringent enforcement, including fines that are stiff enough to act as deterrents to violation, and the potential for criminal prosecution for flagrant and/or repeated violators. As the saying goes, "extinction is forever." In particular, areas identified as habitat for federally protected species such as the Western Snowy Plover need to be kept stringently dog-free. Anything less than that would invite abuse as well as damage to the protected species, something prohibited under the Endangered Species Act.

In addition, designation of dog use areas, and especially leash-free areas, should take into account not only the needs of wildlife habitat, but also those of non-dog owners. Hikers, horseback riders, birders, runners, and picnickers need to have areas where they can, if they choose, be dog-free, as well as areas where dogs are allowed.

Correspondence ID: 2417 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:45:15
Correspondence Type: Web Form
Correspondence: THE wildlife of the Golden Gate Recreational area are diverse and important to protect. I have lived in the bay area my whole life and know that this place is a wonderful climate for many animals to thrive considering we have such mild winters. The main issue I believe that needs to be addressed when working to protect wildlife is recreational vehicles. In my opinion people who love to use off road motorized vehicles with huge tires and loud engines are the ones who pose the biggest threat to the lives of animals. There are also issues with dogs harassing birds, but I believe that people are the ones who do the most damage. There are many dog owners, myself included, who are responsible and aware of how their dogs behave when they come upon wildlife. there should be designated areas that are for leashed dogs and some so dogs can run off leash like there are at Fort Funston. Trails should be well marked and there needs to be places where

birds and other wildlife are protected so no humans, dogs or off road vehicles are allowed. With these suggestions in mind I believe that we can protect wildlife in the Golden Gate recreational area safely and humanely and not have our beaches and tranquil places for reflection blasted with the sound of engines or backfire from vehicles so everyone feels safe and secure.

Correspondence ID: 2418 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:46:52

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Mark McKee Jr.

Correspondence ID: 2419 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As an animal lover and dog owner, having a clean and safe place to have fun with my companions off leash is a wonderful treat.

The park's mission is to protect natural and cultural resources, at the same time allowing for recreational use that won't destroy it.

As much as I would love having more off leash spaces state-wide I also understand and feel that in a case like this that endangered species wildlife habitat deserves a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Also, some people don't like to encounter free roaming pets and dogs can create a lot of stress for other wild animals, even though what are doing is all in good fun.

Because of this, off lease areas should be enclosed or separate in order to protect other visitors, wildlife, the terrain and other dogs. These areas should be placed where than will not have a negative impact on sensitive wildlife and habitats. This includes noise disturbance.

Thank you for considering these comments.

Correspondence ID: 2420 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:47:12
Correspondence Type: Web Form
Correspondence: Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2421 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not to allow recreation to undermine it. Endangered species wildlife habitat deserves a higher level of protection from human disturbance. The compliance rate should be 95%, not 75%, as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation, requiring all off-leash areas to be enclosed to protect park users, wildlife, and other dogs, and limiting off-leash recreation to areas in which it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area and for giving imperiled species a chance to survive, assuming that you do so.

Correspondence ID: 2422 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95% not 75% as outlined. As well as, the Parks Mission is to protect the natural and cultural resources, not allow recreation to undermine it. With these points in mind we must use all of our engery and resources to protect these Grand Areas of these United States of America!

Correspondence ID: 2423 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:48:19

Correspondence Type: Web Form

Correspondence: I HAVE LIVED IN SAN FRANCISCO SINCE 1973 AND I DO NOT WANT ANY OF OUR BEAUTIFUL WILDLIFE TO BE GONE.....WE MUST PROTECT IT. THANKS LYNN

Correspondence ID: 2424 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I appreciate your time in considering our comments.

-The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2425 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:50:06

Correspondence Web Form

Type:

Correspondence: I live across the street from Ocean Beach, between Kirkham and Lawton. Somehow a bunch of dog owners decided that this National Park is their own private dog run, that the birds are there for their dogs' amusement, and that anyone who doesn't want to step in dog poop at the beach, or be hassled by or barked at or threatened by dogs while out walking is a Nazi.

Not only do birds get chased constantly, continuously, not only do the dog owners not pick up after their animals, not only do the dogs threaten people and each other, but dogs die out here. The owners for some reason think that fast currents, undertows and rip tides have no effect on dogs.

Please, this is a national park. I know there's no money for patrols, I know there's no money for anything, but couldn't you make some money off enforcement, enough to pay for the enforcement, at least for a while, at least until the dog owners get the hint and take their activities where they belong? Please.

Correspondence ID: 2426 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:51:59

Correspondence Type: Web Form

Correspondence: Please do not permit public access to this area. It can only harm wildlife that uses it. There are other places people can take their dogs to run free.

Correspondence ID: 2427 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:52:15

Correspondence Type: Web Form

Correspondence: ** Discontinue permitting of unregulated activities that disturb wildlife and marine mammals. ** Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. ** Halt allowing unleashed dogs. Free-roaming dogs represent the most significant recreational threat to wintering western snowy plovers.

Correspondence ID: 2428 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:54:35

Correspondence Type: Web Form

Correspondence: The poor dogs need somewhere to run free too- maybe set aside an area

where they can do that- I am for protecting all other wildlife- but I think we need to give dogs something as well, better than a dirt pile of dog doo

Correspondence ID: 2429 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:55:25
Correspondence Type: Web Form
Correspondence: Please help protect the wildlife of Golden Gate.

Correspondence ID: 2430 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:55:38
Correspondence Type: Web Form
Correspondence: I've followed this matter closely as I have lived in San Francisco over 40 years. I have owned dogs and understand it is necessary to give them places to roam freely. But I strongly support restricting dog activities in the GGNRA because of its unique place in our urban environment. The very beauty and rarity of some of the locations in the area puts them under increased pressure from the adjacent human population.

Humans are restricted to trails to protect plant and animal life and dogs must be similarly restricted. The only way to practically do that is with leashes and I support those restrictions. There is genuine wild life in the recreation area and it deserves to be protected and preserved.

Correspondence ID: 2431 **Project:** 11759 **Document:** 38106
Received: May,02,2011 18:55:53
Correspondence Type: Web Form
Correspondence: Our beautiful natural environment is disappearing at too rapid of a rate. We need to do all that we can to preserve as much of our natural environment as it is essential for all creatures survival and well-being. Thank you.

Correspondence ID: 2432 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please refer to the following remarks regarding protection of our natural resources. There are too many areas to effectively police, so it becomes more urgent to be specific about the activities allowed. Dogs do not need to enter these protected environments.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. --Endangered species wildlife habitat deserve a

higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you for your attention to this important issue.

Correspondence ID: 2433 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:57:09

Correspondence Type: Web Form

Correspondence: It is a testament to our collective interest in preserving natural areas to enjoy that this park is even in existence. We need to carry forward with the necessary regulations for the protection of the animals and plants in the park to make it a worthwhile endeavor. Most parks have leash regulations. I can't imagine why this place that is so full of important species would ignore the need for some kind of rules for the dogs that visit the area. Maybe there should be a designated dog park in an area that doesn't impact the nesting areas. Any nature areas in urban settings are a precious resource for the calming effects and stress reduction of the population of that area. There are always ways to meet the needs of the people and preserve the natural resources. Some give and take and consideration of the most important needs on both sides seems like a simple enough problem to solve.

Correspondence ID: 2434 **Project:** 11759 **Document:** 38106

Received: May,02,2011 18:58:03

Correspondence Type: Web Form

Correspondence: Why do humans think that they and their unleashed animals are entitled to trample every last shred of beautiful habitat left in this country? The NPS needs to exercise some policy changes quickly and protect these last sanctuaries from human impacts. In most cases, I am not a proponent of fines for minor infractions but pet owners need to be fined heavily for the damage their animals cause. It's bad enough that when I go hiking I have to be harrassed by dogs but it goes way beyond sanity when every other creature has to endure their ignorant curiosity. Leave your dogs at home, people! Let's have some peace and quiet in our natural places so we can

listen to the sounds of nature.

Correspondence ID: 2435 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:00:02
Correspondence Type: Web Form
Correspondence: Please ...for the safety and enjoymnet of "all" dogs must be kept on a leash at all times as they must be in all the parks...GGNRA should not be any different...as a 40 year resident of the city I am more than aware of how much worse it has gotten...and I belive I speak for the majority of the residents and the supervisors are"not" speaking for us and are afraid to stand up for the safety of us all.

Correspondence ID: 2436 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:00:05
Correspondence Type: Web Form
Correspondence: I know this is a problem and I stand right in the middle as both a nature lover and conservationist and a dog owner. I think that with education and compromise we can come to a solution that will work for both. The plovers and other wild creatures need our protection and our once wild now domesticated dogs need places to run off-leash. Isn't there enough space in the large system for both?

Correspondence ID: 2437 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:00:21
Correspondence Type: Web Form
Correspondence: Please develop a management plan for GGNRA that requires dogs to be kept on leashes. Dogs are great pets, but dog owners must understand that their unconstrained presence in a wild area disturbs and endangers wildlife there. Thank you.

Correspondence ID: 2438 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harrassment by unregulated recreation.The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.The

park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2439 **Project:** 11759 **Document:** 38106

Received: May,02,2011 19:01:59

Correspondence Type: Web Form

Correspondence: I am very familiar with Stinson Beach -- only slightly with one or two others. It is one of my greatest pleasures to allow my dog to run free on the sand and in the surf, and I see others doing likewise.

However, to my great regret, I believe that dogs should NOT be allowed off leash in any area where wildlife can be impacted -- and this seems to be the case in most areas of Golden Gate Park. If there is any way you can barricade off a few acres to make, as it were, a marine dog park, possibly where human recreational activity has already displaced the wildlife, I would be grateful. However, this would require policing, and I sincerely believe that any enforcement funds will have to be used to police areas where you allow ON-leash activities, since violations of this are already prevalent.

Correspondence ID: 2440 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts

on sensitive wildlife and habitats.

Correspondence ID: 2441 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. What were you thinking?

The park should better accommodate diverse park user groups, such as runners, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Correspondence ID: 2442 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:11:49
Correspondence Type: Web Form
Correspondence: Please protect the beautiful and endangered wildlife and habitat in the Golden Gate Recreation Area. Both are far too valuable to ignore or desecrate.

Correspondence ID: 2443 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

The delicate balance of nature as it occurs without man's interference should be preserved. We have a genuine responsibility to preserve these creatures for the generations who come after us to learn from and enjoy the peacefulness of their presence. The world is filled with ATVs, motorcycles, boom boxes, SUVs and trash. The National Park is not an amusement park; nor is it an arena for human beings to indulge their selfish desires and not take responsibility for the impact their dogs may have on vulnerable other animal species.

Correspondence ID: 2444 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:19:08
Correspondence Type: Web Form
Correspondence: I urge you to protect Golden Gate's wildlife from harassment by limiting off-leash recreation to areas where it won't have negative impacts on wildlife and habitats.

Correspondence ID: 2445 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:19:40
Correspondence Type: Web Form
Correspondence: Please Please enforce the leash law in GGP. I have a dog and I never take him off the least except in an off leash dog park. I am an amateur bird photographer and bird watcher and I respect both areas of being a responsible dog owner and wildlife lover.

Correspondence ID: 2446 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:21:41
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2447 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Eden Kennan

Correspondence ID: 2448 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:24:56
Correspondence Type: Web Form
Correspondence: dogs & birds don't mix

Correspondence ID: 2449 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:25:53
Correspondence Type: Web Form
Correspondence: I am a dog owner and a dog lover. It is absolutely inappropriate to have dogs off leash on the beach. There are other places designated for that(Dog beach Dog park etc). Not in the crucial wildlife habitat like this one!! There should be a fine imposed on off leashed dogs in that area.

Correspondence ID: 2450 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area is one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. The park is home to more endangered and threatened species than any other park in the continental U.S

Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, to help protect these species and other protected

wildlife, inappropriate activities such as motor vehicle use on beaches are banned. However, unregulated activities that disturb wildlife like western snowy plovers and marine mammals are permitted, unregulated off-leash dog recreation in these areas have resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

| | | | |
|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 2451 | Project: 11759 | Document: 38106 |
| Received: | May,02,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. | | |
| | --Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. | | |
| | --The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. | | |
| | --Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. | | |
| | --Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. | | |

Correspondence ID: 2452 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: We must protect these lands from any and all sources of harassment. These include recreations. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Let's face it, natural resources and recreation just don't go together.

Correspondence ID: 2453 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2454 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: As I understand it, the park's mission is to protect natural and cultural resources, and therefore, recreation should not be permitted to undermine that mission. In that regard, an endangered species wildlife habitat deserves a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

To make that goal a reality, the park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with

service animals, by offering more than one trail and more beach areas free from dog recreation. Moreover, all off-leash areas should be enclosed to protect park users, wildlife, and other dogs, and these off-leash areas should be located so as to not have a negative impact on sensitive wildlife and habitats.

John Stallone

Correspondence ID: 2455 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Correspondence ID: 2456 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:32:59
Correspondence Type: Web Form
Correspondence: I love offleash dogparks and beaches, however, wildlife protection takes precedence over recreation in my book. Please continue to fulfill the National Park mandate to protect the land and inhabitant species for the benefit of future generations.

Correspondence ID: 2457 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: How is this park's mission any differnt than the Ano Nuevo reserve? What the wildlife don't present the same threat to humans & dogs that elephant seals present? How is this truly different? Humans and pets are not allowed near the elephant seals, why should they at any other natural reserve?

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2458 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's primary mission is to protect the natural and cultural resources.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as mountain bikers, runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Correspondence ID: 2459 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2460 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2461 **Project:** 11759 **Document:** 38106

Received: May,02,2011 19:37:42
Correspondence Type: Web Form

Correspondence: Please protect and preserve Golden Gate Park's wildlife!!! Do not allow recreation to undermine it. This is an endangered species wildlife habitat and as such it deserves a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Wild life is and wonderful and educational thing that must be protected for our future!

Correspondence ID: 2462 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:40:30
Correspondence Type: Web Form

Correspondence: permanent protections for the animals of golden gate.

Correspondence ID: 2463 **Project:** 11759 **Document:** 38106

Received: May,02,2011 19:40:39

Correspondence Type: Web Form

Correspondence: PLEASE KEEP OUR ENVIRONMENT & ESPECIALLY THE ANIMALS HEALTHY AND ALWAYS HERE FOR US

Correspondence ID: 2464 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Sir

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you.

Correspondence ID: 2465 **Project:** 11759 **Document:** 38106

Received: May,02,2011 19:42:31

Correspondence Type: Web Form

Correspondence: I feel it is very important to keep a large area free from dogs. I know for the community they need an area that is designated leash free.

Correspondence ID: 2466 **Project:** 11759 **Document:** 38106

Received: May,02,2011 19:43:25

Correspondence Type: Web Form
Correspondence: i support this

Correspondence ID: 2467 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2468 **Project:** 11759 **Document:** 38106

Received: May,02,2011 19:48:44

Correspondence Type: Web Form

Correspondence: Although I realize that dog-owners and dog-exercisers need a place where dogs can run free, it should not be a place where an endangered species is known to nest (or attempt to nest.) Also, though no-one talks about this very much, there are human beings who would just as soon be able to enjoy the out of doors without being annoyed or menaced by unleashed dogs. Please, don't allow dogs to run free on Ocean Beach!

Correspondence ID: 2469 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: We often enjoy the beach areas of the GGNRA and are upset when we see dogs running free in areas where we notice that flocks of beach birds must flee their approach.

I believe there should be areas where dogs may be allowed, similar to dogparks but larger, so that they may run free, but that dogs should be prohibited from other areas. They leave their scent behind and can cause disruption to native wildlife -- even if they don't chase it.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Fences should restrict all off-leash dogs from encroaching on other areas and attacking properly restrained dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2470 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:50:48
Correspondence Type: Web Form
Correspondence: I too am a pet owner of both the four and two-legged variety. Also, I am a caretaker of not just my pets, but of the world in which we live. Alas, too many self-indulgent, and, I'm sorry to use this adjective, ignorant individuals really believe that it's part of the natural order to have their animals running rampant through critical habitat that is local and unique, unlike their beloved quadrupeds! Please, people, get a grip of what is best for all of the natural world in the long term.

Correspondence ID: 2471 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:51:14
Correspondence Type: Web Form
Correspondence: Because The Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S., we must keep it safe and love it as we would our children. Because in a sense, every animal is our child.

Correspondence ID: 2472 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:51:58
Correspondence Type: Web Form
Correspondence: It's up to you to save the Golden Gate's Wildlife - you need to be able to live with your vote....

Correspondence ID: 2473 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:52:36
Correspondence Type: Web Form
Correspondence: Please help the snowy Plover to survive. These species have a tough time against the encroachment of humans and their dogs. Please note it is our responsibility as stewards of this planet to make it a safe habit for all living creatures.

Correspondence ID: 2474 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please limit dogs in Golden Gate National Recreation Area. I am tired of the trend in recent years for dog owners to successfully demand public places for their pets recreation. This has been detrimental to all the creatures that live in or visit the parks, including humans. I don't see that the public has any responsibility to provide this opportunity for pets.

I have owned dogs, and I have never expected anyone else to take any responsibility for their care. They should be greatly restricted in GGNRA, for the sake of the wildlife and of the area experience for humans.

Endangered species wildlife habitat deserves a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as proposed.

Thank you for your consideration.

Sheila Lodge

Correspondence ID: 2475 **Project:** 11759 **Document:** 38106
Received: May,02,2011 19:55:31
Correspondence Type: Web Form

Correspondence: We must remember that extinction is forever! We must remember to save something of wildlife for our grandchildren to enjoy. We must be stewards of the earth!

Correspondence ID: 2476 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: First, let me say that I am a dog-lover. But, having said that, dogs are not an endangered species - far from it. So, in the case of Golden Gate's beaches, I feel that the birds and other species should have their habitat protected from dogs.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2477 **Project:** 11759 **Document:** 38106

Received: May,02,2011 20:00:11

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Red Taylor

Correspondence ID: 2478 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to urge you to take more steps to protect wildlife in the Golden Gate Recreation area in the draft dog management plan. The Park's mission is protect natural resoucess. It is not to enhance recreation at the cost of harming the natural wildlife in the area.

There are endangered species wildlife habitat in the Golden Gate Recreation area and unregulated recreation activies are endangering them. Unleashed dogs and cats are great dangers to the Snowy Plover and marine mammals.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The Park should Require all off-leash areas to be enclosed to protect park users. The plans should restrict dogs. off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Thanks for your work to improve the experience for visitors to the area. I have been there a number of times and it is a very special area.

Correspondence 2479 **Project:** 11759 **Document:** 38106

ID:**Received:** May,02,2011 20:04:45**Correspondence Type:** Web Form**Type:****Correspondence:** Dear Sir or Madam;

Please enclose areas for off-leash recreation for dogs in the National Park and place them well away from sensitive wildlife habitat. The park should place the needs of native wildlife over recreation for dogs. I love dogs as much as the next person, but it is not appropriate for them to be running unrestrained in our few remaining treasured wild places.

Thank you for your consideration.

Sincerely;

Lori Albee

Correspondence ID: 2480 **Project:** 11759 **Document:** 38106**ID:****Received:** May,02,2011 20:06:38**Correspondence Type:** Web Form**Type:****Correspondence:** Without doubt Golden Gate Park is a national treasure not to be found anywhere else in the United States.

The land forms and their interaction with unique waters of the San Francisco Bay on the one hand and the Pacific Ocean on the other make this place special. The predictable fogging of the area makes for the survival of unique plants and their supportive role for endangered birds.

Please do all you can to preserve this place. Please.

Correspondence ID: 2481 **Project:** 11759 **Document:** 38106**Received:** May,02,2011 20:06:45**Correspondence Type:** Web Form**Correspondence:** Please ensure dogs are kept leashed in public park lands.

Correspondence ID: 2482 **Project:** 11759 **Document:** 38106**Received:** May,02,2011 20:08:14**Correspondence Type:** Web Form**Correspondence:** Please protect our public spaces.

Correspondence ID: 2483 **Project:** 11759 **Document:** 38106**ID:****Received:** May,02,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats

Correspondence ID: 2484 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 20:10:25

Correspondence Web Form

Type:

Correspondence: Feral cats must also be removed from the Golden Gate Recreation Area. It must be illegal to establish and feed free roaming cat colonies in parks. Feral cat colonies are fed by caretakers and the feral cats stay in one area because of the food supply. They have decimated quails in the area and are the threat to future generations of birds since they kill fledglings that are still unable to fly.

Wildlife in parks must be protected from *domestic animals* such as cats and dogs. Thank you Elaine Charkowski

Correspondence ID: 2485 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 20:10:56

Correspondence Web Form

Type:

Correspondence: I am writing to urge the National Park Service to protect the last few habitats for wildlife, including the western snowy plover, from human and domesticated animal disturbance.

As a frequent wildlife observer, jogger, and mother who takes her son out for walks in wilderness, I witness first hand the detriment dogs and their owners wreak on very sensitive areas. Besides failing to clean after their dog (or even another person's dog), I have witnessed dogs chasing wildlife, including shorebirds and foxes, because some dog owners have no control over their animals whatsoever. I have seen fences erected by park services torn down by dog owners. Worse, I have felt that my son was threatened by a dog, when an owner had let his dog off-leash and was out of proximity to

where his dog had wandered off to.

I like dogs, even love some of them, but I beseech the National Park Service to heed the substantial amount of research that shows the negative impact dogs have on wildlife habitat and insist on upholding the parks as somewhere where people are safe from harassment of unruly dogs, free from encountering dog feces -- and most of all a place to enjoy wilderness and wild animals without the intrusion of dogs, who are not part of the natural ecology.

Correspondence ID: 2486 **Project:** 11759 **Document:** 38106

Received: May,02,2011 20:11:43

Correspondence Type: Web Form

Correspondence: There should be question about this and what it means to our wild and us. This is a paradise of wild life in an urban area a brief esprit for humanity. Please do your job and protect us and future generations for what is a spiritual and placid space. With good planning most can be accommodated but not at the expense of our natural resources. Protect protect protect.

Correspondence ID: 2487 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please help protect Golden Gate National Recreation Area. This park is one of our country's most meaningful endeavors to offer protection to endangered wildlife and increase appreciation of nature in a highly urbanized region. The park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance and activities.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have

negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2488 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Thank you for accepting comment on the GGNRA plan.

We need to keep in mind the overall goal, and not allow recreation to undermine it.

I suggest the endangered species protection compliance rate be 95%, not 75% as outlined.

I'd like to see the park better serve runners, horseback riders, families, and those with service animals. Would you please add in offering more than one trail and more beach areas free from dog recreation?

It seems very important that off-leash areas to be fully separate by physical barriers, such as fences, to protect park users, wildlife, and other dogs.

Would you please make sure to limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats?

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2489 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as

runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2490 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: you for accepting comment on the GGNRA plan.

We need to keep in mind the overall goal, and not allow recreation to undermine it.

I suggest the endangered species protection compliance rate be 95%, not 75% as outlined.

I'd like to see the park better serve runners, horseback riders, families, and those with service animals. Would you please add in offering more than one trail and more beach areas free from dog recreation?

It seems very important that off-leash areas to be fully separate by physical barriers, such as fences, to protect park users, wildlife, and other dogs.

Would you please make sure to limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats?

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2491 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. --Here in Santa Cruz, off-leash dog recreation is well-regulated. And we don't have snow plovers. Golden Gate National Recreation does, and has the most threatened and endangered species of any national park. So much more should you protect that wildlife.

Correspondence ID: 2492 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2493 **Project:** 11759 **Document:** 38106

Received: May,02,2011 20:22:21

Correspondence Type: Web Form

Correspondence: There needs to be a place for dogs to run and be dogs. I fear that the regulations in the national seashore are going to kill the spirit in which the park was created. Leave the beaches alone. Mark

Correspondence ID: 2494 **Project:** 11759 **Document:** 38106
Received: May,02,2011 20:25:52
Correspondence Type: Web Form
Correspondence: RE: Dog Management in Golden Gate National Recreation Area

Dogs don't mix well with wildlife, especially in small areas and among small animals. No one would tolerate humans gratuitously disrupting the lives and life cycles of wildlife in a park or reserve, so why do we permit irresponsible individuals to do so through the pets they bring with them into such places? Dogs should be on leash to keep them away from vulnerable wildlife. If specific zones where off-leash activities would not imperil wildlife can be identified, then they should be so designated to accommodate dog owners.

Correspondence ID: 2495 **Project:** 11759 **Document:** 38106
Received: May,02,2011 20:26:33
Correspondence Type: Web Form
Correspondence: Dear Sirs,

I urge you to keep in mind your duty to protect the wildlife in your care in the Golden Gate Recreation Area, in particular the endangered bird species that nest on the beach. The number one danger to these birds is unleashed dogs. This is natural - dogs by nature will chase birds. Their owners, even if aware of the presence of these endangered birds by reading signs, will not be able to keep their dogs away if the dogs are off leash. And many members of the public just refuse to leash their dogs anyway, feeling somehow that they have a right to use the beach as they please, uncaring of the consequences to wildlife. You probably know people with that mindset. But, YOU are in the position of being able to enforce a separation of endangered birds and dogs, whereas the rest of us can only fume in frustration. PLEASE, institute and enforce rules to keep dogs away from the beach nest sites of these endangered birds.

Correspondence ID: 2496 **Project:** 11759 **Document:** 38106
Received: May,02,2011 20:27:02
Correspondence Type: Web Form
Correspondence: Greetings, I have hopes that this area could be managed to be an area where migratory birds are protected. I think that limiting the "off leash" activities of canines is imperative. I do not wish to ban dogs but I believe that area of impact should be limited by boundaries that should be enforced. (I don't

wish to see fences, but acceptable alternatives can be found.) For those of us that wish to walk on the beach and observe birds or other native wildlife undisturbed by boisterous or aggressive animals, having a feeling of being "safe" would be welcome.

Thank you

Correspondence ID: 2497 **Project:** 11759 **Document:** 38106
Received: May,02,2011 20:29:16
Correspondence Type: Web Form
Correspondence: There surely are more appropriate areas in the San Francisco area where we can permit unleashed dogs to run free. Just because an area has "recreation" in its title does not mean that that recreation cannot be restricted to permit enjoyment of the area by all who go there, not just (or primarily) by one particular type of visitor. We do, after all, all pay taxes and vote.

Correspondence ID: 2498 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2499 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not

allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2500 **Project:** 11759 **Document:** 38106
Received: May,02,2011 20:35:43
Correspondence Type: Web Form
Correspondence: Stop bad planning!

Correspondence ID: 2501 **Project:** 11759 **Document:** 38106
Received: May,02,2011 20:36:21
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2502 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2503 **Project:** 11759 **Document:** 38106

Received: May,02,2011 20:40:19

Correspondence Type: Web Form

Correspondence: To whom it may concern:

We all have to obey the laws of the land, and in this case the Endangered Species Act applies to the situation of the beaches in the San Francisco Bay Area that are home to the Plover. Dog walkers are subject to the same laws as the rest of us, and they shouldn't be able to overturn these because of some imagined entitlement to do as they please. Thank you for your time,
Fred Rinne

Correspondence ID: 2504 **Project:** 11759 **Document:** 38106

Received: May,02,2011 20:41:11

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

The park should better accommodate diverse park user groups, such as

runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

All off-leash areas should be enclosed to protect park users, wildlife, and other natural areas. Also off-leash areas should be located and limited in scope to not have negative impact on sensitive wildlife habitats.

Thank you creating a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2505 **Project:** 11759 **Document:** 38106
Received: May,02,2011 20:41:27
Correspondence Type: Web Form
Correspondence: WHILE I ENJOY ALLOWING MY DOGS TO GO OFF LEASH, I DON'T BELIEVE THAT ALL AREAS ARE APPROPRIATE FOR THAT ACTIVITY. IF WILDLIFE IS AT RISK THEN DOGS AND PEOPLE MUST FIND OTHER AREAS TO ROAM FREELY

Correspondence ID: 2506 **Project:** 11759 **Document:** 38106
Received: May,02,2011 20:43:08
Correspondence Type: Web Form
Correspondence: As a resident of the Bay Area, I would like to let you know the importance of keeping the Golden Gate Reserve as pristine as possible because it is a National Icon as well as a place for recreation, breathing fresh air, and gives nature lovers a place to go without driving out of the City. It is a unique mix of ocean and woods, all in a relatively urban area.

I have taken my family many times during our lives on family outings and it is surprising to see how the area is used by families. Today the options for working people are few and with the new generations that like to stay indoors, this is a place to keep as an option for the public and future generations, as previous generations did for us. We now have to think beyond the immediate future and keep areas the cement the nuclear family unit.

Thanks for taking the time to read what I have to say. Peter Montana

Correspondence ID: 2507 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form

Correspondence: Golden Gate Park is a wonderful area, one I visit every time I'm in San Francisco. It's home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. Recreation and wildlife can co-exist with more freedoms for both if a few simple changes are made. For example, the park could better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers. Some simple solutions: 1) Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. 2) Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Please protect a wonderful resource and make it available to both humans and wildlife to enjoy. Thank you for your consideration.

Correspondence ID: 2508 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Protect the specialness of California's nature

Correspondence ID: 2509 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2510 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserves a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Please require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thanks for your consideration.

Correspondence ID: 2511 **Project:** 11759 **Document:** 38106
Received: May,02,2011 21:04:26
Correspondence Type: Web Form
Correspondence: I don't believe that dogs should be allowed off leash in a national recreation area. I do believe that preservation of wildlife should be a priority.

Correspondence ID: 2512 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I'm too tired to comment here!

Correspondence ID: 2513 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please make efforts to protect the sensitive wildlife in the Golden Gate National Recreation area. Any reasonable compromise accommodating dog owners should be considered. I live in an urban area where dog owners are provided off-leash fenced parks in the communities. Our national parks and the natural resources within them should be safeguarded for generations to

come. It would be arrogant as humans to ignore our obligations to protect those resources that are vulnerable to the decisions of satisfying the interests of a few. We as citizens of the USA should not feel entitled or possessive towards Federally owned parks. NPS should act as stewards to preserve and protect our parks. I think this can be achieved without austere governing.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2514 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Correspondence ID: 2515 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Our wildlife and wild habitat are already under severe threat because of population, construction, pollution and many other problems. we need to do what we can to protect the wildlife in our parks. --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2516 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: Golden Gate NRA is a fabulous resource. It is incredible lovely and has so much history. I enjoy visiting and enjoying its various aspects. However, I fully believe the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Large dogs suddenly coming at you can be very alarming, and little ankle-biters are almost worse than the large ones. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Loose dogs and sensitive habitats are NOT compatible - regardless of what my dog-crazy friends say.

Correspondence ID: 2517 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please protect wildlife.

Correspondence ID: 2518 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: It really is upsetting to hear people like Sarah Palin talk about not perserving wild life. It galls me that people who claim to be Christian only think of man never of animals who's life is also very precious. Who is to say, that it is okay for an entire species can be wiped out. People come here from other counties and destroy our fishing. They destroy our banks with shitty diapers, crap buckets, throw trash in the waters. We have that problem here where, 20 yrs ago the fishing was great, now it is a disaster. Although we have some home grown people doing it also. If it wasn't for the Forest Rangers there would be no wildlife. Oh, and people like Sarah Palin.

Correspondence ID: 2519 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Protect the wildlife.

Correspondence ID: 2520 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 21:33:34

Correspondence Type: Web Form

Type:

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2521 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation!! I am making this request for the following reasons:

- The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.
- Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.
- The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.
- Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.
- Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

We need to create a better park experience at Golden Gate National Recreation Area and give imperiled species a better chance to survive.

Correspondence ID: 2522 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

- Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.
- The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.
- Require all off-leash areas to be enclosed to protect park users, wildlife,

and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2523 **Project:** 11759 **Document:** 38106

Received: May,02,2011 21:36:06

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

Lets limit Human impact and creat alternative areas for activities that disrupt our few remaining ecological treasures. Thanks, Michael

Correspondence ID: 2524 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I feel it is the mission of the Park to protect natural and other resources. You should not allow recreation to undermine it.

Endangered species habitat must have a higher level of protection from humans and all that goes with us. Your compliance rate should be 95%, not 75% as outlined.

The park should offer more than one trail in order to accommodate many different park users. There are runners, horseback riders, families, and those with service animals who all use the park.

All off-leash areas should be closed to protect park users, wildlife, and other dogs.

Off-leash recreation areas should be placed where they will not harm or interfere with sensitive wildlife and habitat.

Thank you for your time and attention to this matter.

Correspondence ID: 2525 **Project:** 11759 **Document:** 38106

Received: May,02,2011 21:37:09
Correspondence Type: Web Form
Correspondence: I'm glad this issue is being debated. I think a modest fee for walking dogs in public facilities is ok.

Correspondence ID: 2526 **Project:** 11759 **Document:** 38106
Received: May,02,2011 21:38:44
Correspondence Type: Web Form
Correspondence: Please keep you policy regarding dogs strict and punitive. Dog owners must be responsible in protecting endangered species. Dog owners cannot have their way all over San Francisco. There must be RULE they have to abide with. Save the Snowy Plovers!

Correspondence ID: 2527 **Project:** 11759 **Document:** 38106
Received: May,02,2011 21:41:49
Correspondence Type: Web Form
Correspondence: Dogs should not be permitted to run free in the GGNRA except in areas in which wildlife cannot be threatened or injured. Reasonable efforts should be made by staff to find or establish such areas if practical. Providing for or allowing for the exercising dogs is not an appropriate, primary, or vital function for such a precious place as the GGNRA. It is a place for human recreation and enjoyment to the extent that preservation and guarding of the environment is not impaired.

Correspondence ID: 2528 **Project:** 11759 **Document:** 38106
Received: May,02,2011 21:41:58
Correspondence Type: Web Form
Correspondence: Protect the GGNRA, do not allow dogs at all.

Correspondence ID: 2529 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please -- no dogs! If they're allowed, old people, blind people, and disabled people are as good as banned. I've been attacked so often in my city parks in San Francisco by dogs whose owners are nowhere to be seen that I've given up going to parks I used to frequent. Don't let that happen in the GGNRA.

Also, it's been proved by study that dogs have an even worse impact on wildlife than previous thought, by the University of Utah. Here's a link to a

Daily Mail piece about a study in the "Bioscience" journal:

<http://www.dailymail.co.uk/sciencetech/article-1354546/Dogs-wreak-havoc-habitats-threaten-endangered-species.html>

I release that dog owners and groups like SFDOG are formidable, but you are mandated to protect what should live longer than these people and their pets.

Thank you.

Correspondence ID: 2530 **Project:** 11759 **Document:** 38106

Received:

May,02,2011 21:50:32

Correspondence Type:

Web Form

Correspondence:

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

P.S. I Love Wildlife love Brandon M Bean. AND FOR OUR KIDS LIVE & THEY FUTURE TO.

"In this great future, you can't forget your past?" Bob Marley

P.S. I Love Wildlife love Brandon M Bean.

Thank you for helping to save these executives why saving the Western Gray Whale important.

Thank you for considering my comments. I look forward to your swift action to ensure a complete ban on whaling in Iceland.

Sincerely,

Thank you for your consideration of this issue.

Thank you for considering my views on this issue. I look forward to your reply.

Sincerely, Thank you for considering my views on this issue. I look forward to your reply.

Yours truly, Thank you for considering my comments. Thank you for taking my concerns into consideration. Sincerely, Thank you for considering my comments. P.S. I Love Wildlife love Brandon M Bean. Thank you for receiving my comments. Sincerely, Brandon M Bean Thousand Oaks CA 91362-3030 I love 8stops7 They Rock. <http://www.8stops7.com> ?Thank you for considering and conveying my message to your government. Sincerely, Brandon M Bean

I love 8stops7 They Rock. <http://www.8stops7.com>

Sincerely,

Brandon M BEAN

Correspondence ID: 2531 **Project:** 11759 **Document:** 38106
Received: May,02,2011 21:52:00
Correspondence Type: Web Form
Correspondence: In every other National Park I've ever visited (and that is quite a few of them), dogs are never allowed off of a leash. I was quite surprised to discover that they are allowed off of a leash in the GGNRA.

The point of course, is to protect the natural environment, wildlife, visitors, and the dogs themselves. So I don't understand why unleashed dogs are permitted in this particular park.

I don't want it to sound as if I don't like dogs. On the contrary... we are a dog owning family. And we take good care of our dog, and always work to keep her safe.

I would urge the NPS to keep the rules consistent across all parks, and require dogs to be leashed at all times. It's the safest thing for all involved.

thank you.

Correspondence ID: 2532 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Since the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined, it needs protection from unregulated off-leash dog recreation and other activities that disturb wildlife living there.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2533 **Project:** 11759 **Document:** 38106
Received: May,02,2011 21:56:20
Correspondence Type: Web Form
Correspondence: The Golden Gate Park system was not created to protect or provide recreation for dogs, as much as I like dogs. It was created, in part, to protect species such as the Snowy Plover and their nesting grounds. Dog owners yet louder than Snowy Plovers but the obligation is to the later. The two don't mix near the nesting grounds. Therefore, it is imperative for the park service to stand their ground on this issue as I don't believe there is any realistic "cutting the cake down the middle" option. It never works out that way anyway. Many dog owners think they had 'rights' and will expand on any liberties given to them in the national park. They often don't think their dogs should have to stay on leash and so decide which laws they will obey, as an example. Unless the park service has unlimited funding for enforcement and the guts to do so, dog rules need to be very clear, areas for the free running of dogs need to be very limited, and any rules established need to be enforceable with the manpower to do so.

Correspondence ID: 2534 **Project:** 11759 **Document:** 38106
Received: May,02,2011 21:56:32
Correspondence Type: Web Form
Correspondence: Please keep this land pristine so that it may thrive for future generations. It is less important than many other works, but much larger in the grand scheme of things. Our children need to grow up and continue to see whatever wilderness and grand beauty of nature that is afforded to them so

they can appreciate and pass this on to their children.

Correspondence ID: 2535 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. We have lost too many animal species due to indifference and that needs to change. The park should also require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. And limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2536 **Project:** 11759 **Document:** 38106
Received: May,02,2011 22:00:46
Correspondence Type: Web Form
Correspondence: Our parks deserve our help - they bring beauty and nature into lives. Please save them.

Correspondence ID: 2537 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S., more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, but unregulated off-leash dog recreation resulted in habitat encroachment and wildlife harassment by dogs. The park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

1. Endangered species wildlife habitat deserve a 95% level of protection

from human disturbance, not 75% as outlined.

2. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

3. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

4. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Lori Kegler

Correspondence ID: 2538 **Project:** 11759 **Document:** 38106
Received: May,02,2011 22:03:05
Correspondence Type: Web Form
Correspondence: I am speaking as a person who loves dogs and understands that they need areas in which to run off-leash, but who also believes that such areas must be created far away from wildlife, especially endangered species. Allowing dogs to disturb wildlife and harm or destroy such wildlife's natural habitat is unacceptable. I support banning off-leash dogs, and even on-leash dogs, in habitats where their presence is a danger to native and/or endangered animals and plant life.

Correspondence ID: 2539 **Project:** 11759 **Document:** 38106
Received: May,02,2011 22:03:51
Correspondence Type: Web Form
Correspondence: As a former dog guardian, I really appreciated the use of GGNRA property, Fort Funston. Our well behaved dog never destroyed habitat and remained under voice control. Nonetheless, the native species deserve protection especially if endangered. Pleas make provision for that.

Correspondence ID: 2540 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S., more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, but unregulated off-leash dog recreation resulted in habitat encroachment and wildlife harassment by dogs. The park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

1. Endangered species wildlife habitat deserve a 95% level of protection from human disturbance, not 75% as outlined.
2. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.
3. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.
4. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Robin Kegler

Correspondence ID: 2541 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Sir/Madam,

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Please ensure the Park continues in its mission to protect all the flora and fauna within its borders and serve as a valuable asset to people of San Francisco, our state and our country.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Thank you.

Correspondence ID: 2542 **Project:** 11759 **Document:** 38106
Received: May,02,2011 22:12:11
Correspondence Type: Web Form
Correspondence: Please limit off-leash areas to sections of the park where dogs will not disturb sensitive wildlife and habitats. And please require all off-leash areas to be enclosed.

Correspondence ID: 2543 **Project:** 11759 **Document:** 38106
Received: May,02,2011 22:12:47
Correspondence Type: Web Form
Correspondence: The habitat around the Golden Gate needs to be protected or many wonderful species will be danger of disappearing. Many tourist and residents visit San Francisco's Golden Gate Park to enjoy the beautiful view as well as the animals that visit this area.

Correspondence ID: 2544 **Project:** 11759 **Document:** 38106
Received: May,02,2011 22:14:44
Correspondence Type: Web Form

Correspondence: I urge you to limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you, Leslie MacKay

Correspondence ID: 2545 **Project:** 11759 **Document:** 38106

Received: May,02,2011 22:14:51

Correspondence Type: Web Form

Correspondence: My husband and I are against any UNLEASHED DOGS in GGNERA. We have had HORRIBLE experiences with unleashed dogs and their owners. We have owned beloved dogs.but can not today due to living in a small condo,which we feel to be unsuitable for dogs. At this point, I who have a bad back and orthotics in my shoes,am TERRIFIED to walk alone ...the last time we went to Chrissy Field,uncontrolled dogs were leaping all over the walking trail. This has also happened on the green in front of the old Officers' Club in the Presidio. There is NO SUCH THING as 'voice control",we have seen this over and over,people call to their dogs,nothing happens. Many ignore what they are doing,or laugh as their dogs threaten others. Someday,there will be a tragedy. I pay taxes. I am a FOURTH generation San Franciscan,who was brought up with manners and courtesy in the old refined days. Now I feel forgotten due to a group of loud mouthed selfish illogical dog owners. We have happily donated money to the Park-BUT --We will NOT donate another cent if this ridiculous loose dog situation continues. I feel threatened, stressed and frightened going there--and in what was once my city--feel afraid to go alone! Plus I do not want my tax dollars going to clean up after destruction caused by dogs, This is a NATIONAL PARK--our taxes pay for this. NO other park allows these pets! I can no longer even safely enjoy the places I loved as a child. This is immensely depressing to me. I know friends who would love to walk there - -some whose only joy is walking ---while recovering from chemotherapy--but they are afraid of loose dogs,it only takes one fall to ruin a senior citizen's life forever. I fear for the plants and wildlife. DO NOT listen to these screamers,and remember that I --and the many people I talk to --have financially supported you but will never again do so if these dog owners win. I fear THEY will not financially support you,but will simply ruin and take over the park. We thank you. Please consider seriously what we have said-for the safety of all-- and our beloved environment. Gerald and Nancy Wright

Correspondence ID: 2546 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I urge the National Park Service to protect Golden Gate's imperiled wildlife

from harassment by unregulated recreation.

The park's mission is to protect the natural and cultural resources. Recreation, and especially the accommodation of pets, should not take precedence over the protection of these resources. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. All off-leash areas should be enclosed to protect park users, wildlife, and other dogs. Any off-leash recreation should be restricted to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for considering my comments.

Correspondence ID: 2547 **Project:** 11759 **Document:** 38106
Received: May,02,2011 22:15:32
Correspondence Type: Web Form
Correspondence: As a concerned citizen, I urge Urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2548 **Project:** 11759 **Document:** 38106
Received: May,02,2011 22:16:07
Correspondence Type: Web Form
Correspondence: Please ensure that dogs be kept on leashes at all times in areas that are

important habitat for wildlife like the snowy plover. People will let their dogs chase these little birds without realizing that the birds have nowhere safe to get respite from the harassment, and thus are using precious energy in constant flying. Off leash dogs often defecate on the beach or bother people taking walks on the beach- to allow everyone to have a peaceful beach experience, it is imperative that off-leash sites for dogs be fenced in or kept separate from wildlife habitat, so that dogs are not allowed to menace animals or people who do not enjoy the company of dogs.

Correspondence ID: 2549 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Superintendent, Thank you for the opportunity to provide comments on the National Park Service's management at Golden Gate National Recreation Area. I think it is important that you consider short-term and long-term impacts in your decision making, and think about how to prevent impairment of your resources, which you are mandated to preserve. Allowing pet dogs to run amok-- and shirking your duty in an irresponsible public relations move-- is clearly not looking at the issue from a long-term perspective. Please consider the following points as you weigh your decision, and do the right thing: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

In conclusion, I have faith that you will consider all of the park's resources over one narrow user group... and their dogs.

Thanks for your consideration, Mike Cipra

Correspondence ID: 2550 **Project:** 11759 **Document:** 38106

Received: May,02,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Please limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence 2551 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 22:21:13

Correspondence Web Form

Type:

Correspondence: Please take the following points into account:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

I hope you will take my recommendations into account before taking any future action.

Correspondence 2552 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 22:24:40

Correspondence Web Form

Type:

Correspondence: Everyone deserves the chance to experience nature in their everyday lives. Having this type of "open space" in urban areas is going to be what saves our sanity in the highly charged and ever-quickening pace of humanity. Preserving the flora and fauna in oases such as this should be a high priority if we are to exist in more than just a barren world in the future.

Correspondence 2553 **Project:** 11759 **Document:** 38106

ID:**Received:** May,02,2011 22:25:20**Correspondence Type:** Web Form**Type:**

Correspondence: As the mother of a small child, my family often uses the West beach area near the Warming Hut. During the times of year when it is not snowy plover season, and thus leashes required, we often have dogs running around the beach without their owners closeby. The dogs frequently come right up to the small children and sometimes scare them, and their parents. I have even seen dogs fighting with one another around small children. Thankfully I have never seen anyone hurt, but it is very disconcerting and frightening for children. There is also the problem of dog poop on the family beach. Due to these reasons, I would support the separation of dogs and the requirement for leashes in most areas. There should be dog-free areas for those people, and of course for the endangered species, who do not enjoy being around dogs that are not on leash. San Francisco has plenty of dog-friendly parks. Thank you.

Correspondence ID: 2554 **Project:** 11759 **Document:** 38106**ID:****Received:** May,02,2011 00:00:00**Correspondence Type:** Web Form**Type:**

Correspondence: I used to live in San Francisco. And whether there or any other beach, wild or park I've been to when dogs are allowed to run freely and do what they want, dogs rule the day. I've never seen a bird nor any other creature but humans in a dog park. They're great companion animals, however endangered species and wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

I believe the park should require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs just like in any dog park you visit.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2555 **Project:** 11759 **Document:** 38106**ID:****Received:** May,02,2011 22:31:46

Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area should protect wildlife by regulating domestic dogs in this park. Thank You. T.K. Wang

Correspondence ID: 2556 **Project:** 11759 **Document:** 38106

Received: May,02,2011 22:33:44

Correspondence Type: Web Form

Correspondence: I am in favor of your proposal.

I live directly across the street from an open space district which hosts dogs and walkers of all shapes and sizes. I put out a water dish and keep it filled, in an attempt to be friendly and neighborly to both dogs and walkers.

There is no such thing as voice control. Our weekends are punctuated by untrained dog walkers yelling for their dogs. Dogs routinely crash through the underbrush chasing deer and squirrels. We once had a dog chase our cat into our house through the front door.

At your beaches we have experienced, in addition to the above, untrained dog walkers watching their dog urinate on our family's toys spread on the sand. How do you explain that to a child?

You are wise to allocate a budget for enforcing your plan.

Please keep up the good work and implement your plan.

Correspondence ID: 2557 **Project:** 11759 **Document:** 38106

Received: May,02,2011 22:35:56

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife,

and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2558 **Project:** 11759 **Document:** 38106

Received: May,02,2011 22:42:30

Correspondence Type: Web Form

Correspondence: I am writing to help protect wildlife from inappropriate activities such as that represented by off-leash dogs. These activities have resulted in habitat encroachment and wildlife harassment by dogs. It has been reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival. Please give them a chance to thrive.

Correspondence ID: 2559 **Project:** 11759 **Document:** 38106

Received: May,02,2011 22:57:43

Correspondence Type: Web Form

Correspondence: I wish to urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts

on sensitive wildlife and habitats.

Thank you for your attention!

Sincerely, Kristin Womack

Correspondence ID: 2560 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2561 **Project:** 11759 **Document:** 38106
Received: May,02,2011 23:12:14
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2562 **Project:** 11759 **Document:** 38106
Received: May,02,2011 23:25:39

Correspondence Web Form

Type:

Correspondence: Please consider the following regarding environmental impact of this park:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you.

Correspondence 2563 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 23:31:36

Correspondence Web Form

Type:

Correspondence: We need to do all we can to protect what little pristine natural environment we have left and also to protect the wildlife that lives in these areas.

Correspondence 2564 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2565 **Project:** 11759 **Document:** 38106

Received: May,02,2011 23:34:11

Correspondence Type: Web Form

Correspondence: I believe the park's primary mission is to protect natural and cultural resources, recreation uses should not be allowed to compromise that mission. Allowing unleashed dogs within the park runs contrary to the parks mission and is inconsistent with the notion of making the park a place for wildlife. And it is not just about wildlife: Unleashed dogs are also sometimes a threat to people and other dogs, and they interfere with many visitors' enjoyment of the shoreline.

I have witnessed firsthand the damage that unleashed dogs can do at the Pillar Point Shoreline and Marsh in Half Moon Bay, CA. While there is a leash law in effect for this area, it is widely ignored by dog owners. Dogs are constantly running up and down the beach chasing shorebirds, and dogs routinely wander into the marsh damaging water bird habitat.

Therefore, I urge you to require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs and to limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for considering my views.

Correspondence ID: 2566 **Project:** 11759 **Document:** 38106

Received: May,02,2011 23:38:41

Correspondence Type: Web Form

Correspondence: I have frequented the GGNRA for over 40 years. It is a great place to go to be in contact with nature and to observe the abundance of plant and animal life. I can appreciate that dog lovers might want their animals to run free BUT many do not and will not control their animals. There are many urban areas for these pets. I do not want to be bothered by other peoples pets and I do not want to see wildlife harassed by them. There is absolutely no reason for dogs to go free in these wildlife rich areas. Therefore I support:

--Requiring all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. AND --Limiting off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2567 **Project:** 11759 **Document:** 38106
Received: May,02,2011 23:38:59
Correspondence Type: Web Form
Correspondence: I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. Unleashed dogs represent the most significant recreational threat to wintering western snowy plovers. Please patrol the area and enforce leash laws vigorously.

Correspondence ID: 2568 **Project:** 11759 **Document:** 38106
Received: May,02,2011 23:39:10
Correspondence Type: Web Form
Correspondence: we need to preserve spaces for our animals whose homes we have taken thaks you

Correspondence ID: 2569 **Project:** 11759 **Document:** 38106
Received: May,02,2011 23:43:45
Correspondence Type: Web Form
Correspondence: Please do not permit dogs throughout the park, or restrict them to very small areas where one does not have to encounter them. In addition to their negative impacts on sensitive wildlife and habitats, they have extreme negative impacts on me. I am severely allergic to dogs AND their flees. There are very few areas I can go in the Bay Area for a wilderness walk (or any walk) without encountering not just dogs and their flees, but off leash dogs that bound straight for me. If I get within 6 feet of a dog, I end up with huge, painful welts from these dog-flee encounters that take over six months to heal.??? I have been disabled for 20 years with allergies. This proposal would accommodate my disability.

When I saw your proposal to limit dogs I felt like a miracle had happened. I could really, maybe, be able to take wilderness type walks again.

Thank you SO much for having the courage to deal with this issue.

Correspondence ID: 2570 **Project:** 11759 **Document:** 38106
Received: May,02,2011 23:48:20

Correspondence Web Form

Type:

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive. Our wildlife will thank you for your concern.

Correspondence 2571 **Project:** 11759 **Document:** 38106

ID:

Received: May,02,2011 23:51:48

Correspondence Web Form

Type:

Correspondence: Dear Lawmakers and Stewards of the National Parks: Recreational areas are ubiquitous, accessible and convenient to the freeways of this glorious land. A National Park is a bequest to the future, to our grandchildren and the non-human inhabitants of our land, in a gesture much more far sighted than our popular culture allows. You have a unique responsibility: preserving places of peace and quiet for the future, for our children. Allowing recreation is to allow exploitation by commercial and exclusive entities whose values are not in the long term interests of the environment that you have the responsibility to protect.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. All off-leash dog areas should be enclosed to protect park users, wildlife, and other dogs.

Please, as custodians of our heritage, limit off-leash recreation to areas

where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2572 **Project:** 11759 **Document:** 38106

Received: May,02,2011 23:54:48

Correspondence Type: Web Form

Correspondence: Thank you for the opportunity to present comments related to the future uses of the Golden Gate National Recreation Area as it relates to the Dog Management Plan. This land is one of our nation's treasures and a place to be enjoyed by those privileged enough to live near it or visit it. However, with privilege comes the responsibility to respect the land and its natural and cultural resources so that those resources are protected and remain for future generations to come. It is the role of the National Park Service to protect the wildlife of the Golden Gate National Recreation Area as well as the habitat of that wildlife.

As is too often the case, those who seek to visit and "use" our parks, are not always sensitive to the fragility of the environment. They may never have been taught or have never stopped to think what kind of "footprint" they might be leaving behind as a result of their visit. While Smokey the Bear has taught most of us about the dangers of forest fires, how might we have learned about the need to protect the unique nesting places needed to sustain an endangered bird like the western snowy plover. The National Recreation Area is more than and deserves greater protections than does a local park where grasslands might be trampled in the pursuit of a soccer championship.

I would like to see a higher level of protection from human disturbance when it comes to protection of sensitive and endangered species wildlife habitat up from the outlined 75 percent to 95 percent.

While many urban residents have dogs and desire to share recreational opportunities with them, it is very important that the interests and desires of dog owners not overshadow environmental concerns and/or the recreational needs of other types of park users. The desires of any set of users should not be allowed to weigh heavily on the health of the endangered species in the park. The needs of dog users' should not overshadow the needs of other types of park users, including runners, bicyclists, walkers, etc. Unfortunately, members of my own family have been attacked by dogs off of leash while they (the family members) were running and biking. This is an unacceptable situation and speaks to limiting the amount of parkland where dogs can be allowed to be "off leash." Safety of park users must be a

primary concern of park officials when establishing new user policies. This is especially important knowing that small children will be frequenting the park and dogs may be in close proximity to them. Having dogs on leash on trails and roads is important but it is still not without danger. It will not stop the diggers from halting their digging. It will not ensure that the owners clean up after them, etc. There must be very clear policies and rules given to those who bring dogs into the parks. And it must be understood that all visitors, with canines or not, must not engage in any recreational activity that undermines the park's natural and cultural resources and has negative impacts on sensitive wildlife and habitats.

Because dogs tend to follow a scent (and cannot read signs designating off-leash areas), the off-leash areas should be enclosed. (This is also for the dogs' protection from animals that might otherwise harm them.) In addition, the off-leash areas should be limited to areas where they will not have negative impacts on sensitive habitats. Additional areas free from dog recreation should be provided in the park plan for the many different types of park users. In some parks, it may not be possible to provide a path where even dogs on leash can be walked. This is especially true where there are no alternate paths available.

Thank you for your consideration.

Correspondence ID: 2573 **Project:** 11759 **Document:** 38106
Received: May,02,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence 2574 **Project:** 11759 **Document:** 38106

ID:**Received:** May,02,2011 00:00:00**Correspondence** Web Form**Type:****Correspondence:** I fully support the position of the National Parks Conservation Association, as follows:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence 2575 **Project:** 11759 **Document:** 38106**ID:****Received:** May,03,2011 00:00:00**Correspondence** Web Form**Type:****Correspondence:** Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals.

Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild

energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Strict enforcement of the existing laws that are designed to protect this resource, must be a priority. Please place Golden Gate National Recreation Area as a high level resource to be protected son that it serves it's purpose...the survival of a dynamic and unique ecological resource that can be enjoyed by the rsidents of California, and the rest of the country.

Sincerely, Ralph Sanchez

Correspondence ID: 2576 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:01:00
Correspondence Type: Web Form
Correspondence: I. Am sure we all want to save all the living species. For ourselves and future generations. We must ensure our parks and especially endangered species.

Correspondence ID: 2577 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:02:05
Correspondence Type: Web Form
Correspondence: I am writing to request that you please protect Golden Gate's wildlife, from harassment by unregulated recreation. Endangered species wildlife habitat deserve a higher level of protection from human disturbance.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. All off-leash areas should be required to be enclosed to protect park users, wildlife, and other dogs. And off-leash recreation should be limited to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your time and attention to this matter.

Correspondence ID: 2578 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:05:49
Correspondence Type: Web Form
Correspondence: I am a dog lover and dog sitter. I especially appreciate the few areas where

dogs are permitted to be off leash on the beach. Dogs provide companionship to humans and exercise is an important part of that relationship. On leash areas provide little exercise for dogs and people in comparison. Have you ever watched the dog to person interaction or dog to dog interaction that happens on the beaches where dogs are off leash? It is quite a wonderful sight.

I am also a lover of wildlife and do many many things to protect it. Being a member of the Nat'l Parks Conservation Association I respect and understand the concern of protecting the wildlife from the dangers that dogs can pose. My recommendation is to limit off leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your consideration, Cynthia Carley

Correspondence ID: 2579 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: DO THE RIGHT THING !!!

Correspondence ID: 2580 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Correspondence ID: 2581 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:18:31
Correspondence: Web Form

Type:

Correspondence: Please keep the GGNRA a safe habitat for the endangered species that make their homes there. For now, and for the future. Thank you.

Correspondence ID: 2582 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: .

Correspondence ID: 2583 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:26:00

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

And the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

I would like the park to better accommodate diverse park user groups (such as runners, horseback riders, families, and those with service animals) by offering more than one trail, by having more beach areas free from dog recreation, by requiring that all off-leash areas be enclosed to protect park users, wildlife, and other dogs. by limiting off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2584 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Hello People: As an operator of a public transport fixed route bus in Marin County I ask only that you take a good look at the traffic patterns, especially on weekends and especially during the summer months going to and from Stinson Beach. The number of people visiting the beach is increasing and the large free parking lot next to the beach is sometimes full, leaving many visitors to park where else they can, including but not limited to areas

designated "no parking"; because the cost of a ticket is worth the parking place. Better public transportation can make a difference. Marin County Transportation District's West Marin Stage Coach operates two buses on weekends and holidays, and I heard that this past weekend there were more passengers hoping to board than could be accommodated and were asked to wait for the next bus. I could spend pages describing the many facets of transportation to and from this increasingly more popular area, but you could see it for yourself and if you made a few sketches of the details involved I'm sure that better solutions would become clear to you. It's not complicated. Few would argue that fewer cars on the roads of the GGNRA would be a worthy goal. [Look at what has been happening in Yosemite these past years}. In closing let me tell you what I experienced a couple of years ago when I was driving one of the two weekend Stage Coaches during the summer: I was heading east toward Mill Valley and stopping in Stinson Beach to pick up visitors desiring to return to their homes after a day of the beach and the trails and Muir Woods sight-seeing. Among the crowd was an elderly woman traveling alone. When it became evident that many of the people would not be able to get on bus, for there were far too many, despite the good size of the bus [capable of holding 35 passengers more or less] a young man already on board graciously relinquished his seat that the older woman might ride. Since she was sitting near the front she was able to talk to me. We climbed the few miles out of Stinson Beach village up Panoramic Highway to the first stop at Pantoll Ranger Station and Camp area. About two-thirds of the bus-load got off. This is normal pattern. The woman said to me, in effect, "well, now we'll continue on all the way to Marin City with the bus only a third full and those twenty people we couldn't pick up are still standing at the bus stop four miles down the mountain!" She wasn't scornful; she was employing a little irony. The transportation scheme needs some attention from those concerned and capable of instating some systems. Thanks for all you do, George

Correspondence ID: 2585 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:52:18
Correspondence Type: Web Form
Correspondence: WE NEED TO KEEP THIS WONDERFUL PARK OPENED AND TO HELP ALL THE ENDANGERED SPECIES AND THREATENED SPECIES AT GOLDEN GATE NATIONAL RECREATION AREAS AND PARK

Correspondence ID: 2586 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:54:16
Correspondence Type: Web Form

Correspondence: Please keep GGNRA open to dogs and off-leash walking. GGNRA is one of the few areas with enough open space for people and their dogs to get out and jog or play frisbee.

The current proposal is extreme and not in the best interests of GGNRA wildlife or the citizens of California. A small percentage of people may allow their dogs to chase wildlife. These same people allow their children to chase the snowy plovers and other wildlife as well. However, it doesn't make sense to punish the majority of GGNRA users and their dogs with this extreme proposal. A much better solution would be to better educate people about the wildlife at GGNRA and create stiffer penalties for the people who allow their dogs or children to harass the wildlife in any way. Rather than leashing dogs and discouraging people from using the GGNRA let's educate people and ensure that the people causing the problems are held responsible

Correspondence ID: 2587 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

thank you for your time and consideration.

sincerely, judy m.

Correspondence ID: 2588 **Project:** 11759 **Document:** 38106

Received: May,03,2011 01:12:41

Correspondence Type: Web Form

Correspondence: Dogs should be on leases where wildlife is threatened.

Correspondence ID: 2589 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2590 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to urge you to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. The Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. I understand that the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

These are my thought about the best uses for the park:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Bill Nolan

Correspondence ID: 2591 **Project:** 11759 **Document:** 38106

Received: May,03,2011 02:09:32

Correspondence Type: Web Form

Correspondence: The mission of the park is to protect its natural and cultural resources. Recreation should not be allowed to undermine this.

Endangered species wildlife habitat deserves the highest level of protection from human disturbance. The compliance rate should be 95%, not 75% as outlined.

To accommodate the park's diverse user groups, such as runners, horseback riders, families, and those with service animals, more than one trail and more beach areas free from dog recreation should be provided.

All off-leash areas should be located where they will not negatively impact sensitive wildlife and habitats. These off-leash areas should be fully enclosed to protect park users, wildlife, and other dogs.

Correspondence ID: 2592 **Project:** 11759 **Document:** 38106

Received: May,03,2011 04:44:26

Correspondence Type: Web Form

Correspondence: To Whom It May Concern:

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Sincerely, Syreeta Batiste

Correspondence ID: 2593 **Project:** 11759 **Document:** 38106

Received: May,03,2011 05:43:33

Correspondence Type: Web Form

Correspondence: I am in favor of having leashed and unleashed areas set aside in National Parks for people to take their dogs. In general, dogs are much less of an issue than humans in parks.

I also believe that areas should be protected for endangered species. I urge you to do this while still allowing people to take their dogs with them where humans are allowed.

The vast majority of people in the US are dog owners and we are being excluded from our Parks. Closing all trails and the like to even dogs on leash puts dogs in danger if their owners what to even drive through a park. (How would you like to sit in a parked car on a sunny day or be chained to a picnic bench so your owners could view a site?)

Correspondence ID: 2594 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Park Service,

I am a resident of the Bay area, and visit & support the Golden Gate Recreation Area frequently. Although it is extremely important that people enjoy themselves in the park, especially in its most urban sites, the park's mission is to protect the natural and cultural resources, not allow recreation

to undermine it.

As a birder & wildlife enthusiast, one of the primary benefits I receive from the park is its function as a wildlife refuge. Endangered species wildlife habitat deserve a high level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined in current plans.

As much as I like dogs, I recognize that they can be dangerous to wildlife, small children, and each other. Also, many people are afraid of dogs, having been bitten or attacked at some time. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Certainly, all off-leash areas should be enclosed to protect park users, wildlife, and other dogs. These off-leash recreation areas should be sited so as to not have negative impacts on sensitive wildlife and habitats.

Thank you for listening.

Andrea Kean

Correspondence ID: 2595 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank You Vincent Weis

Correspondence 2596 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 07:37:18

Correspondence Web Form

Type:

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Correspondence 2597 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 07:42:52

Correspondence Web Form

Type:

Correspondence: What we have on this earth now, is all we will ever be able to share, enjoy and pass on to the next generation. It is responsibility of the National Parks to help us preserve our parks, that is what you were instituted for to begin with. Do not fall back on your mission!

Correspondence 2598 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 07:47:43

Correspondence Web Form

Type:

Correspondence: The Golden Gate National Recreation Area is an amazing resource that I use and treasure. As vast as it is, it doesn't seem very difficult to provide free range to dogs and protection for other park users, from wildlife to people. I would like to see off-leash dogs restricted to certain areas. Thank you for

your consideration.

Correspondence ID: 2599 **Project:** 11759 **Document:** 38106

Received: May,03,2011 07:48:20

Correspondence Type: Web Form

Correspondence: As a previous resident of Arcata, I understand the trials and efforts behind protections for Snowy Plover populations. It is critical to keep disturbances low during nesting season. Please help to increase Snowy Plover populations by limiting OHV use as well as off-leashed dog disturbances on your beach areas.

Correspondence ID: 2600 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As a long-time resident of the Bay Area, I had the opportunity to enjoy the true beauty of the Golden Gate National Recreation Area's natural and cultural resources. I am hopeful that you will not allow unfettered recreation to undermine the original mission of the park.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Laura G. Jones-Bedel

Correspondence ID: 2601 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 07:58:58

Correspondence Type: Web Form

Type:

Correspondence: I rescue dogs and enjoy a beech run with my pups as much as anyone. However, on a recent visit, I was stunned that several owners disregarded their dogs chasing after birds in the area. 'Self-policing', as practiced in other dog parks, did not seem to apply here. Gentle words were responded with threatening behavior. In speaking with other dog owners there, I became informed the practice of letting dogs chase birds was common. As a hunter, trainer, scientist, I can't abide by that practice.

Please follow steps of other parks nearby where posting requires dogs stay on leash, an ENFORCE! That would be a help to all dog owners. If this step cannot preclude the damage; you should close off the area.

Sincerely

Kelly Burch

Correspondence ID: 2602 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 08:17:06

Correspondence Type: Web Form

Type:

Correspondence: Please take action to ban any activities that threaten the wildlife that exists in this habitat. Whether it be unleashed dogs or irresponsible human activity, our wildlife needs the protection from you if it is to flourish, thank you.

Correspondence ID: 2603 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 08:20:19

Correspondence Type: Web Form

Type:

Correspondence: There are more than enough places for people to go to enjoy the outdoors. There are also plenty of places for people to allow their dogs to run around. Let's face it, dogs aren't endangered and probably never will be, do they really NEED to be able to run around in a protected wildlife area? NO. This is ridiculous. This place has been set aside for wildlife, ONLY wildlife. We have taken over 95% of what used to be "wild", can't we let the animals have their small chunk of space and leave it at that?

Correspondence ID: 2604 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 08:21:06

Correspondence Type: Web Form
Correspondence: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Correspondence ID: 2605 **Project:** 11759 **Document:** 38106
Received: May,03,2011 08:26:29
Correspondence Type: Web Form
Correspondence: As a frequent visitor and birder, I am writing you to encourage restraint of animals within these fragile environments. Allowing off-leash dogs to engage in hunting behaviors with wildlife is a undue stressor for wildlife. Imagine it's as if a pack of several hundred foxes were let loose. They may not successfully hunt, but they flush and pursue birds, tiring them and wasting the resources they need to breed, rear and reproduce. When off-leash domestic animals are allowed to pursue wildlife, everyone loses.

Correspondence ID: 2606 **Project:** 11759 **Document:** 38106
Received: May,03,2011 08:33:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect natural and cultural resources, not allow recreation to undermine it. Please ensure that this policy is continued.

Correspondence ID: 2607 **Project:** 11759 **Document:** 38106
Received: May,03,2011 08:38:59
Correspondence Type: Web Form
Correspondence: The National Park Service has a responsibility, and actual mission, to protect natural and cultural resources, not allow recreation to undermine it. When considering that, one would want endangered species habitat to have a high level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

With any area where pets are allowed off-leash, you must be able to separate the general public from the pets and pet owners. I have seen many occasions where pets are truly not trained and become a threat to those around them. Even little dogs can bite! Off-leash areas should be enclosed to protect park users, wildlife, and other dogs.

The park should accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more

than one trail and more beach areas free from dog recreation.

Please limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2608 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2609 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:00:02
Correspondence Type: Web Form
Correspondence: --The park should be off limits to motor vehicles. Not only is the noise a nuisance, but the emissions are bad for people and animals and the water as well.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you, Dianna

Correspondence ID: 2610 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:03:09
Correspondence Type: Web Form
Correspondence: We have visited this are with our dogs. It is nice to have some areas that are dog friendly, off-leash, but we have no problem with these areas being restricted to certain parts of the coast in order to protect the wild-life.

mkj

Correspondence ID: 2611 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:06:34
Correspondence Type: Web Form
Correspondence: How can we NOT do everything possible to support what wildlife remains? Life on earth without wildlife would be desolate. Nothing exists in isolation, and people are no exception - we are all interdependent. The presence of wildlife is a huge source of pleasure for millions of people, to say nothing of what it means to the creatures themselves. I urge you to please do whatever possible to maintain the environment needed for the animals and plants remaining!

Correspondence ID: 2612 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:09:40
Correspondence Type: Web Form
Correspondence: Dogs should be allowed, but not running wild. Under control, fine.

Correspondence ID: 2613 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The time is now....

Correspondence ID: 2614 **Project:** 11759 **Document:** 38106

Received: May,03,2011 09:27:35
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your time.

Correspondence ID: 2615 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00
Correspondence Type: Web Form

Correspondence: This country needs to do every single thing it can to protect and preserve our wildlife. It is a symbol of a nations respect for it's heritage.

Correspondence ID: 2616 **Project:** 11759 **Document:** 38106

Received: May,03,2011 09:28:32
Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as

runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Cesar

Correspondence ID: 2617 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:33:03
Correspondence Type: Web Form
Correspondence: limit off lease areas for dogs where it will not impact sensitive creatures.

Correspondence ID: 2618 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:33:41
Correspondence Type: Web Form
Correspondence: Thank you for reviewing my comments. As a long time hiker in wilderness areas I greatly appreciate the opportunities we Americans have to enjoy the natural world. I have seen the impact of dogs on wildlife. Whether leashed or not, their presence affects all the other animals present. I have witnessed off-leash dogs turn quiet, pristine woods and beaches into chaos, including habitat destruction. Clearly our burgeoning population wants and needs recreational opportunities, but that need cannot trump the parks main mission: to protect the natural and cultural resources. I believe that the park could and should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation and require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Given the very large number of endangered species in the GGNRA and the parks proximity to major population centers, wildlife, especially endangered species and their habitats must be accorded the maximum protection.

Correspondence ID: 2619 **Project:** 11759 **Document:** 38106

Received: May,03,2011 09:36:19

Correspondence Type: Web Form

Correspondence: Please protect Golden State Park and the creatures who live there. Stop the motor vehicles that disrupt the nature of the Park. Also the dog problem needs to stop, as they harass the creatures that live there.

Correspondence ID: 2620 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2621 **Project:** 11759 **Document:** 38106

Received: May,03,2011 09:44:38

Correspondence Type: Web Form

Correspondence: San Francisco, and in fact most of the North and South Bay areas, have some of the most liberal dog-friendly facilities in the country. This means, in short, that there are plenty of places for dogs to run off leash dog parks to

play in and areas to hike and walk on leash. Sensitive areas like the Bay Beaches should be off limits to off leash dogs because they harrass, interrupt breeding cycles and even kill, wildlife. Historically, Northern California residents are very firm in in their stance on protecting wildlife and enhancing the health of the Bay. There is no need for more "playgrounds" for dog, but there is a need to protect the birds and animals we love.

Please declare the Bays beaches off limits to dogs. If this is done it will also aid in educating the public about conservation and resource protection.

Correspondence ID: 2622 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:46:15
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Endangered species wildlife habitat deserve a higher level of protection from human disturbanc. The compliance rate should be 95%, (not 75% as outlined). I consider this matter urgent and I greatly appreciate your help!

Correspondence ID: 2623 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:46:28
Correspondence Type: Web Form
Correspondence: There are plenty of other places people can take their dogs, ATV, cars, horses, ect.... Let this be what it is, a "safe zone" for native plants and animals.

Correspondence ID: 2624 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:49:32
Correspondence Type: Web Form
Correspondence: The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Correspondence ID: 2625 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not

allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2626 **Project:** 11759 **Document:** 38106
Received: May,03,2011 09:54:08
Correspondence Type: Web Form
Correspondence: Please require leashes on dogs in the park to protect other species. A national park should take all possible precautions to ensure the survival of native plants and animals.

Correspondence ID: 2627 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2628 **Project:** 11759 **Document:** 38106

Received: May,03,2011 09:58:38

Correspondence Type: Web Form

Correspondence: To prevent the destruction of species, and the consequent destruction of ecological systems, I ask you to prevent the entry into all national parks of invasive species, including those domesticated by humans; to prevent industrialization and exploitation of every kind; to prevent litter; to reduce pollution in all areas of life; and to take no aid from the industrial sector.

Correspondence ID: 2629 **Project:** 11759 **Document:** 38106

Received: May,03,2011 09:59:31

Correspondence Type: Web Form

Correspondence: -The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2630 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more

endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2631 **Project:** 11759 **Document:** 38106

Received: May,03,2011 10:05:54

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2632 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:08:47
Correspondence Type: Web Form
Correspondence: I do believe that most dog owners are responsible and serious about the environment and will help to keep the area clean, tidy and their animals under control. All creatures great and small deserve a good life. Most dogs love to run free and especially in CA, it seems a place to run free is difficult to find. Please help our animals. DOG is GOD spelled backwards.

Correspondence ID: 2633 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:09:32
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area

Correspondence ID: 2634 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:14:38
Correspondence Type: Web Form
Correspondence: Wildlife throughout the whole country is facing degradation and elimination of there environments. San Francisco has been very progressive with many other movements and I believe this is another important one to stand behind.

Correspondence ID: 2635 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

For a better park experience and for giving imperiled species a chance to survive:

* Natural and cultural resources must be protected. Recreation should not undermine these main goals.

* Endangered species wildlife habitat need a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

* The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

* All off-leash areas should be enclosed to protect park users, wildlife, and other dogs. (A friend's dog, who was ON leash, was badly bitten by an off-leash dog and my friend was also bitten when he tried to save his dog. This occurred at the GGNRA beach.)

* Limit off-leash recreation to areas where it will not have negative impacts

on sensitive wildlife and habitats.

Thank you.

Correspondence ID: 2636 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:17:50
Correspondence Type: Web Form
Correspondence: I love dogs and and I love wildlife but, in the end, dogs have many more options for recreation than do wild species for survival. Please preserve this bit of land for the plovers and their wild friends to do what they've been doing since the beginning of time, living. Once lost, they will not be found again.

Correspondence ID: 2637 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear National Park Service Staff -

I have recently become aware from the NPCA that there are problems in the Golden Gate National Recreation Area with endangered and threatened species. I am very concerned about the way human activities are impacting wildlife, and I feel we need to work more to protect threatened species than we have been doing.

I support the NPCA's position on the following points:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts

on sensitive wildlife and habitats.

Please do all you can to make sure that people who are enjoying nature are not also damaging threatened species at the same time. I would like the future to include a rich diversity of wildlife for a healthy planet and for the enjoyment of future generations.

Thank you!

Diana Gillis

Correspondence ID: 2638 **Project:** 11759 **Document:** 38106

Received: May,03,2011 10:23:05

Correspondence Type: Web Form

Correspondence: Although I am a hiker and wildlife watcher who is a member of several local environmental organizations, I am speaking only for myself and not representing any group with which I am affiliated. I do not have a dog, but I sympathize to a certain extent with dog "guardians" who seek a place to exercise their dogs and enjoy the outdoors with other dog owners. Yet I do not think that the national park lands in the Bay Area are the places to do that without restriction. After all, it is not the mission of national parks to provide dog-exercise areas.

Many residents of the Bay Area like myself want to visit the local national park lands to appreciate the natural resources--to botanize throughout the seasons, to observe the birds (especially the migratory shorebirds that rely on the coastal areas for refuge), and to be in the park environment as a counterpoint to the hectic quality of city life. As the population of residents and dogs has increased in the Bay Area, certain GGNRA areas have become much less enjoyable to visit. I live in the East Bay but like to come to San Francisco and Marin, as the GGNRA offers special places unequalled on my side of the bay.

The GGNRA made a serious mistake by seeming to "grandfather" the practice of allowing dogs off leash in areas like Crissy Field and Fort Funston. I'm well aware of the pressure put on the GGNRA by groups of dog walkers, but I feel that it's time to set restrictions. Therefore, I am completely in favor of the proposed plan. It is important to act now in order to protect park resources for everyone.

Furthermore, in my opinion, some off-leash areas should have fences or barriers of some type, a practice followed in some Bay Area cities. As a hiker, I'd like to see designated trails where dogs are not permitted, in the same way that some parks have hiker-only trails where bikes and horses are

prohibited.

I realize that the GGNRA is facing an enormous challenge here, but I urge the GGNRA to look to the future. Something needs to be done so that ten, twenty years from now the GGNRA lands are still a quality national park for people and wildlife, and even dog owners who adhere to the rules and understand why they are in place.

When I read an article on the policy changes in a recent SF Chronicle, I saw a quote that caught my eye and to me summed up the issue. In effect, the speaker said that we are all the guardians of the natural environment. That stayed with me. I hope that the GGNRA crafts a dog policy that puts the natural environment, not one constituency, first.

Thank you for reading this.

Correspondence ID: 2639 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:24:40
Correspondence Type: Web Form
Correspondence: Threatened and endangered species should have a compliance rate of 95%.

Limit off-leash dogs to enclosed/fenced areas.

Thank you for the opportunity to comment.

Sincerely,

Bonnie Schwartz

Correspondence ID: 2640 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:27:34
Correspondence Type: Web Form
Correspondence: My sister lives in the Bay Area & whenever I visit I make sure to get some time in the beautiful space of the GGNRA. I am a walker & I enjoy the peace & the creatures & birds who live in the area. I am a dog owner & when I have him with me he is always on leash where he is supposed to be on leash. As one who follows the regulations it distresses me that other less respectful dog owners are ruining the area for the snowy plovers & for people (even those with dogs) like me. I have also been bitten by a dog so I don't feel comfortable in places where dogs are running free & without proper control from their owners. I know times are hard & there's not a lot of money to go toward protecting wildlife, but we need to do it for ourselves

too. Thank you for preserving such a gorgeous stretch of land!

Correspondence ID: 2641 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:28:12
Correspondence Type: Web Form
Correspondence: Natural and cultural resources should be the focus of future policies for GGNRA. This is a priceless asset and it should be carefully and responsibly cared for. Thank you for your efforts.

Correspondence ID: 2642 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:30:10
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

This park needs to protect wildlife and human use for generations to come. Not just for the short term vision.

Correspondence ID: 2643 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:41:04
Correspondence Type: Web Form
Correspondence: I feel strongly that unleashed dogs should not be allowed in environmentally sensitive areas.

Correspondence ID: 2644 **Project:** 11759 **Document:** 38106
Received: May,03,2011 10:42:21

Correspondence Web Form

Type:

Correspondence: I have been solicited to write and ask you to ban off leash dogs from areas where the snowy plover and other wildlife are found. BUT I prefer to ask you to look into the matter. I use our beaches quite a lot; I love California, I love our Coast, and I love all wildlife. I used to take my dogs to one beach in particular, several times a week. Then dogs were banned from that beach (and many others) due to the snowy plover. I miss that beach deeply; I knew every rock, cliff, spring and tidepool. But: the plovers were there first, so it's the way it has to be, and it is right. But then I read that it's NOT actually the dogs who disturb the birds, it's the humans. "Of course" they weren't going to prohibit humans using the beach, so I felt that dogs were scapegoated. I now must drive much farther to go to a beach where I can walk while my dogs run. There is a section of that beach posted as habitat for the plovers, and a request to keep dogs out. I never see any dogs in that area; but I see tons of humans there!!! So, in conclusion, I agree that the wildlife was here first, and has first rights for the necessary areas. But before banning dogs, please look into the real cause of disturbance, and address that. Thanks!

Correspondence ID: 2645 **Project:** 11759 **Document:** 38106

Received: May,03,2011 10:48:24

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for reading this and yes I am a dog owner and I enjoy off-leash areas but I follow the law and respect our parks

Correspondence ID: 2646 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: We need to stop this incessant greed. We need to preserve our wildlife and their habitats for our future generations to enjoy. We do not need to keep building for the sake of greed and not need.

Correspondence ID: 2647 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As a former resident of San Francisco, a dog lover and a national park supporter I urge you to protect Golden Gate's plants and animals from unleashed dogs and irresponsible dog owners.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Respectfully, Sherry Pennell

Correspondence ID: 2648 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please protect these birds.

Correspondence ID: 2649 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Every species that loses its habitat is a personal loss to every human. We need every species to have a balanced planet. Destroying nature impacts the quality of our lives. WE MUST PROTECT EVERY SPECIES if we do we save ourselves.

Correspondence ID: 2650 **Project:** 11759 **Document:** 38106
Received: May,03,2011 11:06:59
Correspondence Type: Web Form
Correspondence: Please make every effort to protect native species from domestic predators.

Correspondence ID: 2651 **Project:** 11759 **Document:** 38106
Received: May,03,2011 11:08:22
Correspondence Type: Web Form
Correspondence: The National Park Service number one priority should be to the wildlife in the area. Please restrict off leash areas. Irresponsible dog owners have riddled the area with dog poop and made the area unpleasant for people who do not have dogs to visit. The few times I have visited Fort Funston I have been disgusted by the amount of dog poop on the grounds. I have not returned in over a year. It is too bad that a handful of irresponsible and unpleasant dog owners can ruin the area for everyone. I know a number of dog owner groups will fight these new restrictions but I hope the NPS prevails and make this area not only safe for the wildlife that calls this place home but for ALL visitors not just those with four legged companions.

Correspondence ID: 2652 **Project:** 11759 **Document:** 38106
Received: May,03,2011 11:09:54
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

As the Golden Gate National Recreation Area is home to more endangered and threatened species than any other national park in the continental United States, these species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park must better accommodate diverse park user groups, such as

runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Regulations must require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Regulations must limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Protection of wildlife and habitats must have priority over dogs.

Correspondence ID: 2653 **Project:** 11759 **Document:** 38106
Received: May,03,2011 11:10:50
Correspondence Type: Web Form
Correspondence: I urge you to allow off-leash dogs in many areas of the GGNRA in order to provide the public with the recreation space they desire. While it may be appropriate to ban dogs from very sensitive areas to protect endangered species, dogs should not be subjected to blanket provisions that categorize them as destructive. For many thousands of years, wild coyotes and wolves were part of healthy California ecosystems. To single out canine impacts now as problematic is short-sighted and unfair; it is the irresponsible dog owners that need additional restraint and boundaries. Do not punish the masses for the mistakes of a few, we deserve the right to share public open space with our canine companions in a responsible manner.

Correspondence ID: 2654 **Project:** 11759 **Document:** 38106
Received: May,03,2011 11:11:37
Correspondence Type: Web Form
Correspondence: I have been a San Franciscan resident since 1996 and am sincerely concerned about the proposed dog management plan. In addition, I am an Ecology Master's student at SFSU and feel I am uniquely qualified to comment on the state of dogs, people, and native species within GGNRA habitat. I have , botanized, bird watched, hiked, surfed, windsurfed, biked, and walked with dogs within GGNRA for the last 15 years. I currently visit Crissy Field around 3 times per week to walk with my dog. I also often visit Fort Funston and Muir Beach. I have witnessed a lot of the restoration work that has taken place at all these sites and am thrilled with a lot of the work that has been done but am also concerned with how some of these areas have been managed. Dog walking at Crissy Field and other GGNRA sites is an extremely important part of my life and I feel that the current proposed dog management plan would severely curtail my recreation options. I feel that the proposed plan is overly restrictive and is a draconian response to

problems that could be alleviated with small amounts of additional management effort. In addition, limiting the off leash options within the GGNRA will have a negative cascade for off leash dog walking within san francisco, as the limited space that already exists shrinks and becomes overcrowded. I'm concerned that the proposal bans off-leash dog walking in existing places while simpler solutions that would allow dogs and humans to continue to recreate have not been attempted. I have witnessed the non-existent maintenance of fence lines and signage that should protect restored and sensitive habitat. How are people to know which areas to avoid if there is no guidance? Many fences signs are currently deteriorating or covered up by sand dunes or non-existent. This leads to what I see as one of the biggest problems with the destruction of restored habitat, which is mostly people entering existing restored areas where they should not be. I see families set up with on restored dunes and watch as two and four-legged creatures dig into the dunes or trample over the native plants. People would be less apt to do this if there were signs letting them know the work that has been done to such areas and how sensitive the landscape is. The current signage and fences are insufficient. I think the destruction of this type of habitat, in turn, makes a lot of the native plant and bird fans over react and want to curtail dog activities at existing habitat that is optimal for dogs and people to recreate. Yes there should be dunes set aside for birds like the snowy plover but taking away the main beach at crissy field to off leash dog activities and shoreline at ocean beach seems to overreach in protecting habitat. I would like to see the existing space for off-leash dog activities maintained with the addition of better maintenance of signage and fence lines and better enforcement of the unofficial "dogs must be under voice command" policy. I also think, there needs to be people out there giving warnings to people who violate existing dog walking etiquette/policies before they start issuing citations. A lot of people are just not aware that they are not following guidelines and just need to be told how to act responsibly. With the amount of usage the beach areas get at crissy field, resources should be set aside to have a park ranger available at those locations during peak times such as weekends. Rangers could help with not only natural history interpretations, but also give guidance to park visitors as to park activities, and inform and reguide people, and people with dogs, who are acting in ways that is harmful to the habitat. The few times I see rangers at crissy field, they are usually just with groups of kids. There should be more of a ranger presence out there to help visitors actually identify snowy plovers and native plants. Why can there not be one ranger dedicated to beach patrol duty during the summer weekends? More needs to be done but the proposed plan is just not acceptable. It unfairly punishes many people who utilize park habitat responsibly. Don't let the negative actions of a few irresponsible people drastically affect those of us who rely on GGNRA habitat for our recreation.

Sincerely,

Stephen Ingalls

Correspondence ID: 2655 **Project:** 11759 **Document:** 38106

Received: May,03,2011 11:21:30

Correspondence Type: Web Form

Correspondence: I am a dog owner and I do like to go to off-leash places where my small dogs can run free. BUT, just as I believe it is my responsibility to clean up after them, I also believe that there should be serious and effective protection of wildlife. So I think that Golden Gate Park should have off-leash areas, but fenced in such a way that the dogs, wildlife, and everyone else is protected.

The off-leash area should be in one that is not environmentally sensitive. And it should be large enough that it will accomodate the needs of pet owners. The rest of the park should be protected from off leash dogs.

The complilance rate as to the protection of wildlife should be approaching 100%, not a dismal 75%. This can happen with a proper set-up at the park.

Correspondence ID: 2656 **Project:** 11759 **Document:** 38106

Received: May,03,2011 11:23:03

Correspondence Type: Web Form

Correspondence: As I understand it, the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. As such, endangered species wildlife habitats deserve a higher level of protection from human disturbance; the compliance rate should be 95% (not 75% as outlined).

In addition to the wild residents of the park, there are many different users who enjoy the resource. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

I am not a dog owner, and I don't like to visit off-leash parks where lots of dogs roam free (like Fort Funston). I would love it if the Park Service were to require all off-leash areas to be enclosed to protect park users and wildlife. It also would be great if off-leash recreation were limited to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for considering our comments on this important issue.

Correspondence ID: 2657 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 11:24:32

Correspondence Type: Web Form

Type:

Correspondence: Preserving wild habitat as much as possible, where it is still possible, should be the top priority in these areas, especially if they are home to endangered species. There are other areas where people can bring their dogs off leash- this shouldn't be one of those areas.

Correspondence ID: 2658 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 11:24:33

Correspondence Type: Web Form

Type:

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

I have dogs and it is great to be able to let them run free but not at the expense of wildlife and the environment. You should require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs and limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Lastly the park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Thank you for considering these ideas.

Correspondence ID: 2659 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 11:25:31

Correspondence Type: Web Form

Type:

Correspondence: As a former resident of the Bay area and a frequent visitor to California, I care deeply about the preservation of wildlife. Please enact dog leashing regulations and a Dog Management Plan that protect the wildlife in the Golden Gate Park and beaches of that area. We need to protect precious wildlife and dog owners can let their dogs enjoy the beach while leashed, so that all can coexist peacefully there.

Correspondence ID: 2660 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: Given that the park's mission is to protect the natural and cultural resources, it is not acceptable to allow any form of recreation to undermine that mission. However much some people may enjoy spending time with their dogs in the park, there has to be a balance of competing interests.

It is wholly unreasonable for the park to continue to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival; yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. As a telling example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

In my view, the following conditions/limitations should be placed in any GGNRA dog management plan:

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for this opportunity to comment.

Correspondence ID: 2661 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2662 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please do not give in to make the parks private.... They will be ruined forever.

Correspondence ID: 2663 **Project:** 11759 **Document:** 38106
Received: May,03,2011 11:27:48
Correspondence Type: Web Form
Correspondence: I am writing to express my opinion that all off-leash areas should be enclosed to protect park users, wildlife, and other dogs. Simply, limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2664 **Project:** 11759 **Document:** 38106
Received: May,03,2011 11:28:59
Correspondence Type: Web Form
Correspondence: I am writing to urge you to restrict off-leash dog activities in the Golden Gate Park National Recreation Area. The park exists to protect natural and cultural resources -- not to provide recreational activities that will harm them.

As you know, the Golden Gate is home to more endangered species than any other park in the continental United States. Their habitat requires the highest level of protection from human disturbance -- a compliance rate of 95%.

And among recreational uses, free running for pet dogs is a low priority. It should not be allowed to interfere -- as it now does -- with walkers and hikers, runners, horseback riders, families on outings, and handicapped individuals with service animals. Instead, current park management allows

only one trail and a few beach areas free from free-running dogs.

I request that all off-leash areas for dogs be enclosed to protect the park's wildlife, the vast majority of its human users -- and even other dogs.

Correspondence ID: 2665 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2666 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect all wildlife at Golden Gate Park! Thank you.

Correspondence ID: 2667 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Save the wildlife

Correspondence ID: 2668 **Project:** 11759 **Document:** 38106
Received: May,03,2011 11:35:56
Correspondence Type: Web Form
Correspondence: The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. I had dogs and it is nice to let them run free so there should be areas where they can do that and as a dog owner you feel safer to let them run free in an enclosed area where they can't run away.

Correspondence ID: 2669 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Some good reasons are: ? The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. ? Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. ? The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. ? Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. ? Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2670 **Project:** 11759 **Document:** 38106
Received: May,03,2011 11:47:42
Correspondence Type: Web Form
Correspondence: To protect endangered and threatened species within the GGNRA, please establish and enforce protected areas where unleashed dogs are forbidden. This is hard on dog owners and their pets, but San Francisco is a city, and dogs are not ideal big-city pets. The birds were living here long before people with their dogs arrived, and their survival is very important.

Correspondence ID: 2671 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form

Type:

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2672 **Project:** 11759 **Document:** 38106

Received: May,03,2011 12:10:42

Correspondence Type: Web Form

Correspondence: I wholeheartedly support the GGNRA Draft Dog Management Plan. All dogs should be on-leash or in enclosed areas for their own safety and that of wildlife. Wildlife and their habitats, especially threatened and endangered species, in the GGNRA and greater area is under constant threat and protecting that wildlife must be a high Park Service priority and given sufficient funding. Thank you for the opportunity to comment.

Correspondence ID: 2673 **Project:** 11759 **Document:** 38106

Received: May,03,2011 12:21:51

Correspondence Type: Web Form

Correspondence: I am a citizen of San Francisco and supporter of the National Parks. Unregulated, unleashed dogs in GGNRA is destructive to the environment and endangered species. It also creates problems for other users of the park, like me, who prefer peaceful enjoyment more than tripping over (and being bitten by) unleashed dogs.

The GGNRA should restrict unleashed dog areas in the parks. There is a

space for all sorts of activity in the park, and dog owners also need to respect use limits. I encourage you to designate limited and specific areas for unleashed dogs.

Thanks!

Correspondence ID: 2674 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate Park and the wildlife within. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Wildlife habitats must be protected from human activity. Disturbances from human interference with unleashed dogs should not be permitted,

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. These species must be protected, and can be with proper enforcement of park regulations.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Dogs must be leashed as they can pose a danger to runners, horseback riders, and families with other animals. There should be specified off-leash areas which are enclosed to protect park users, wildlife, other families and animals. Off-leash recreation must be confined to these protected areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2675 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2676 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Sir/Madam, I am writing to urge the National Park Service to protect Golden Gate National Recreation Area's imperiled wildlife from harassment by unregulated recreation. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

The Park should also require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs and limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for considering my comments, Saskia Baur

Correspondence ID: 2677 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. For many people, the national parks are a place to escape everyday life and be with nature.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2678 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Please require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Additionally, please limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for giving imperiled species a chance to survive, while helping to create a better park experience at Golden Gate National Recreation Area.

Sincerely, Diana Schmidt

Correspondence ID: 2679 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I believe the park's mission is to protect the natural and cultural resources, not allow uncontrolled recreation to undermine it.

** Endangered species wildlife habitat deserve the highest level of protection possible from human disturbance; the compliance rate should be 95%, not 75% as outlined.

** The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

** Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

** Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2680 **Project:** 11759 **Document:** 38106

Received: May,03,2011 12:59:05

Correspondence Type: Web Form

Type:

Correspondence: Hello,

I am a long time natural resources volunteer in the Presidio and especially at Crissy Field. I also am a Snowy Plover docent at Crissy Field. I speak with dog owners frequently in both these capacities.

I support the park's preferred alternative for Crissy Field with the following comments:

1. compliance requirements should be higher than 75 percent. Something more in line with 90 to 95 percent would make a better visitor experience and encourage less cheating. I appreciate that it may take some time to get to that compliance level, but it would help people like me work with the dog folks if it is that high.

2. commercial dog walking activity should not be allowed. While I appreciate that these folks are small businesses trying to make a living, the dogs beat up the environment, spook wildlife, and don't contribute to the visitor experience. At the very least, they should be licensed like any other business in the park and there should be a limited number of licenses.

3. WPA -- both the east and the west perimeters of the Crissy WPA should be fenced.

Thanks for your consideration.

Correspondence ID: 2681 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Ever so slowly we are being raped of our wildlife, State, local & Federal parks. We must put a stop to this while we still can? This we need for future generations so they may learn, enjoy and have places to see the U.S.A. as it was. Thank You

Correspondence ID: 2682 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection

from human disturbance; the compliance rate should be 95%, not 75% as outlined. 75% is simply too low a percentage of protection.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Dogs are great pets but dog owners have a responsibility to others that their pets don't impede others enjoyment of the park.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Actually, "off leach" should be against the law both for people's protection and the animals protection.

Correspondence ID: 2683 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: In my opinion the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. For endangered species wildlife habitat to receive higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. I feel the park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Also, it should be required that all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Finally, the park should limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2684 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: -The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as

runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2685 **Project:** 11759 **Document:** 38106

Received: May,03,2011 13:35:51

Correspondence Type: Web Form

Correspondence: Hi, my name is Wally - I'm a neighbor in Cow Hollow and strongly favor Alternative A (no change), especially for Crissy Field's East Beach.

Before explaining, I'd like to get something off my chest: On your (GGNRA's) website, the landing page for the Dog Management process (<http://parkplanning.nps.gov/projectHome.cfm?projectId=11759>) has a photo of two happy, off leash dogs romping on what is easily identified as the Crissy Field East Beach. The National Park Service and GGNRA are being a bit misleading on this, because under your preferred alternative, that beach would be off limits to unleashed dogs. Shame on the GGNRA for such duplicity! (If you were to put a big red "X" on that photo, it would be more truthful.)

As mentioned, I'm a neighbor and am fortunate to visit Crissy Field several times a week. Although I normally hike on the main path, I always see off-leash dogs on East Beach with their hosts and everyone is having a great time. On the East Beach, there is very little vegetation and, to my knowledge, no endangered wildlife, so I don't understand why you want to make East Beach off limits to unleashed dogs.

In my rather extensive experience at Crissy Field on a year-around basis, dogs and their hosts are easily the most frequent and enthusiastic users of East Beach. On windy days, windsurfers put time in down there, but they seem to be pleased with the company of other beach enthusiasts, including off-leash dogs.

I understand there are a few relatively warm, relatively windless days each year when sunbathers (not many swimmers!) like to use East Beach ? and yes, I appreciate that a sunbather may occasionally be slightly inconvenienced by a discourteous dog and/or host. For these rare days (in my experience, only 4-5/year), the GGNRA could easily implement a temporary restriction on off-leash dogs on East Beach and redirect their

hosts to the beach west of the lagoon's outlet.

If you at GGNRA make unleashed dogs at East Beach unlawful, who will use that beach? Hardly anybody. And you'll be making many of your neighbors very angry every time they see the beach they formerly enjoyed so much devoid of visitors. And what a waste of a nice, convenient beach that would be!

In summary, at East Beach there is no good reason to change things. Leave things the way they are ? the no change Alternative A. My peer group and I, along with our hosts, will be thankful.

Wally

Correspondence ID: 2686 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I have visited and enjoyed Golden Gate National Recreation Area immensely. And my understanding is the park is home to more endangered and threatened species than any other park in the continental US.

Please protect the park's natural and cultural resources. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; please set a compliance rate of 95% vs the 75% outlined.

The park could better accommodate diverse park user groups (e.g., runners, horseback riders, families, and those with service animals) by offering more than one trail and more beach areas free from dog recreation.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats, and please require all off-leash areas to be enclosed.

Thank you.

Correspondence ID: 2687 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental

U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Correspondence ID: 2688 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2689 **Project:** 11759 **Document:** 38106
Received: May,03,2011 14:24:57
Correspondence Type: Web Form
Correspondence: Please protect our parks and wildlife. I love pets, but we should not allow our pets to destroy the other wildlife at the park. Please limit off-leash areas.

Correspondence ID: 2690 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2691 **Project:** 11759 **Document:** 38106

Received: May,03,2011 14:45:25

Correspondence Type: Web Form

Correspondence: I strongly support the leash requirement for nearly all locations since off-leash dogs that owners "claim" to be voice-controlled can overcome this control and easily get away or be out of hearing distance. Also, the use of long, extendable leashes often results in uncontrolled dog behavior or they wrap around their owner (one recently died as a consequence of this) or other walkers and other dogs. I should not have to feel as if every time I walk that I have to plan for self-defense from the dogs, their long leashes if they have one, and in a number of cases, self-righteous dog-owners who view their "babies" as having more rights than any human, both adults and children.

In some areas of the GGNRA such as Fort Funston, it is now dangerous to bring young children given the large number of large dogs that are not sufficiently controlled. There are too many recent news items of unleashed dogs attacking adults, children and other dogs - with tragic consequences. Some dog owners respect other walkers and subordinate their dog's wants to be considerate to others. However, other dog owners feel that their dog's needs, and by extension their own, supersede and are more important than others. As a consequence, I feel like these owners are bullies and I have stopped going to some areas where I know dog owners fail to control their dogs for fear of being obliged to allow a dog to jump on me and slobber on me. In some cases, I feel the need to have pepper spray with me since the dog owner is obviously recalcitrant and I am afraid he will "sick" the dog on me. I am not even mentioning the lack of concern and the distribution of

dog feces on the beach, on lawns, fields, etc - these feces can easily carry a whole host of parasites and other infectious organisms that can be transmitted to children.

Correspondence ID: 2692 **Project:** 11759 **Document:** 38106
Received: May,03,2011 14:51:39
Correspondence Type: Web Form
Correspondence: Unleashed dogs do not belong anywhere where many people congregate. Some people are afraid of dogs, and not every dog owner picks up the poop that they leave behind. Walking on a beach should not be a time of dodging animals and their leavings.

Correspondence ID: 2693 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please do everything possible to protect the Golden Gate National Recreation Area. We are stewards of the environment, and need to stop causing irreparable damage to the living things around us.

Thank you in advance proving that our trust is not misplaced: do the right thing.

Correspondence ID: 2694 **Project:** 11759 **Document:** 38106
Received: May,03,2011 15:22:22
Correspondence Type: Web Form
Correspondence: As someone who has had a dog for fifteen years, and who loves to be with my canine companion outdoors as possible, I am writing to express deep disapproval of any measures to encourage or enable commercial dog walking in any national parks, and especially in the GGNRA. There was a time when I felt my dog and I had carte blanche "rights" to be outdoors together on hiking trails and public beaches -- I have learned much during the last fifteen years which have enabled me to embrace new understandings of wildlife, ecology, and public use of open space. I encourage the Park Service not to enable commercial dog walking on our public beaches and public lands.

Correspondence ID: 2695 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form

Type:

Correspondence: Owing to the diversity of species that find sanctuary there, San Francisco's Golden Gate Park is unique among urban parks and should be protected.

Correspondence ID: 2696 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 15:36:27

Correspondence Type: Web Form

Type:

Correspondence: A dog is a pet, not wildlife. There are certain very important differences.

A pet must be fed and housed. It focuses on its "owner" to decide its mental health.

A member of wildlife does not need humans. It feeds and houses itself.

However, wildlife can have it's food and/or housing stolen or put in what amounts to a zoo.

Now: When the two meet, without humans, the pet is most likely to lose the interaction. I lived for 14 years in a place called Wildcat Canyon, in the hills behind Richmond. There were cougars and bobcats and coyotes there. I watched a cougar eat a deer. I watched the heads of cats in the gutters along the road.

So, to protect pets from wildlife, if possible, humans take over the territory, one way or another. Wildlife loses.

The GGNRA must remain firm in it's decision to keep unleashed dogs outside. Absolutely.

Correspondence ID: 2697 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 15:48:24

Correspondence Type: Web Form

Type:

Correspondence: Although I'm a dog lover, keeping dogs out of sensitive environmental areas is important to me for the sake of the food chain, and so that future generations can see a wide variety of bird species, and not just read about them. I want my kids to be able to go to parks and see them populated with all kinds of birds and small animals. A dog management program in parks is critical for this to happen.

Correspondence ID: 2698 **Project:** 11759 **Document:** 38106

Received: May,03,2011 15:58:36

Correspondence Type: Web Form

Type:

Correspondence: Unleashed dogs are an invasive species and have no place on sensitive public land

Correspondence ID: 2699 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2700 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 16:02:29

Correspondence Type: Web Form

Type:

Correspondence: In general I agree with what you are trying to do in restricting dog owners with their dogs from areas managed by the NPS. I don't agree with allowing commercial dog walking operations from NPS area. I think that commercial walkers need to be restricted more than the other dog walkers. Currently I'm not a dog owner but may be in the near future and I believe there will be enough places to take my dog with the implementation of your plan. Thanks for your dedication to the PARKS. We need them, we want them, we need to care for them. Thank You

Ron Dutra

Correspondence ID: 2701 **Project:** 11759 **Document:** 38106

ID:

Received: May,03,2011 16:22:01

Correspondence Type: Web Form

Type:

Correspondence: I write in general support of your proposals. I believe they strike a fair balance among the competing needs of dog owners, non-dog owning visitors, and the environment. Since I live in the City and primarily use those parts of the park in the City, my focus has been on them and I think they are fair and reasonable. Fort Funston is a good example; the current situation has made it so that I do not much enjoy visiting it anymore, since I am routinely being run down by off leash dogs, being hit by tennis balls thrown by owners, stepping on dog waste, and so forth. By combining an off leash area with on-leash and prohibited areas, there is room for all to enjoy.

In any event, I would strongly urge you to implement the compliance program you propose. The advocates for off-leash repeatedly make statements that suggest only a tiny minority of owners don't comply with relevant rules, but my experience at parks and other locations where dogs are prohibited or are required to be on-leash is that a large number of owners do not obey the rules. I think the advocates should encourage the responsible owners to self-police the less responsible, and this is a good way to do it.

Correspondence ID: 2702 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: National Park Service,

The Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S. including Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

Unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment, for example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

The Park Service must require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs, and limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Please follow through on the National Park Service's mission to protect natural and cultural resources and not allow recreation to undermine it.

Thank You.

Sincerely, Jon Spitz Laytonville, CA 95454

Correspondence ID: 2703 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2704 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not to allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate

National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Barry R. Kaufman

Correspondence ID: 2705 **Project:** 11759 **Document:** 38106
Received: May,03,2011 17:06:50
Correspondence Type: Web Form
Correspondence: Golden Gate Park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers and more endangered species, so, why are dogs allowed to run loose, in this fragile area? Simple solution, is to restrict dogs to a leash. Also, stop letting children chase the birds, as well!

Correspondence ID: 2706 **Project:** 11759 **Document:** 38106
Received: May,03,2011 17:11:48
Correspondence Type: Web Form
Correspondence: My husband and I are third generation Californians born in the Bay Area. We love San Francisco, the East Bay, the Peninsula and South Bay. We have spent many hours in and around Golden Gate Park. Although we do not currently own dogs, we believe in the lease laws in place where we live. Please protect the species trying to survive in this lovely location.

Sincerely,

Mr. and Mrs. S.L. Mc Donald

Correspondence ID: 2707 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as

runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2708 **Project:** 11759 **Document:** 38106
Received: May,03,2011 17:50:42
Correspondence Type: Web Form
Correspondence: Frank Dean General Superintendent, GGNRA Building 201, Fort Mason San Francisco, CA 94123-0022

RE: Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean:

I am writing regarding the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area. I am a dog owner and a bird lover, and I also use and enjoy the GGNRA lands. Having worked in the animal care industry at a no-kill animal shelter, I am as pro-dog as they come. Above all, though, I advocate for responsible pet ownership, and much of the rhetoric I hear from dog-owners opposed to the proposed rules is extremely emotional, short-sighted, and irresponsible.

I am deeply concerned about impacts from dog-related recreation on the wildlife, habitats and other park users at the park. I strongly encourage you to adopt the proposed new rules. I even more strongly urge you to improve the plan by implementing the following steps:

1. All "Regulated Off-leash Areas" should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. Fences provide more security for all park users and create clearer boundaries so that dog owners are aware of how to comply with park rules.
2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance.
3. Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it.
4. At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs.
- 5.

While dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.

Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measures to protect the National Park's valuable resources for everyone and for future generations.

Thank you,

Stephanie Strait Berkeley, CA 94702

Correspondence ID: 2709 **Project:** 11759 **Document:** 38106

Received: May,03,2011 17:56:19

Correspondence Type: Web Form

Correspondence: I used to "guard" the seals at Jenner 's (Sonoma county) Goat Rock Beach birthing area. Every year the seals haul out to bear their young at the mouth of the Russian River. Common sense tells you that you must have either volunteers or park personnel on duty at this kind of sensitive area to enforce the leashing of dogs, and more important, clamp down on the often nasty cruel torment of the human (children specifically) element. I always had my own dog with me while on duty, and kept him on leash while there.

BUT there is a limit to how much dogs should be "punished" by not being allowed to dive into the waves to fetch sticks, for example (my guy was a Labrador Retriever, and it made our day to play in the sea, as he was made for). We went to a distant (from the seal nursery), inaccessible area of the coast for his (and my) pleasure and exercise. In my extensive experience with dogs, I can state, unequivocally, that they do not seek out birds' nests, nor other flying critters. And what other critter besides the birthing seals are there on our beaches? In all my years with dogs on beaches, none has ever gone after any animal. Nor, frankly, have I seen any animal other than beached seals and birds.

So think twice before you disallow off-leash areas for dogs. They are wonderful animals--protective and concerned. They are the companions made by the gods. They deserve the bit of pleasure and freedom a romp on a beach and into the waves gives them.

Thank you..... from someone who believes in the protection of all wildlife, but who also believes in the elimination of scape-goating the innocent -- the

dog.

Correspondence ID: 2710 **Project:** 11759 **Document:** 38106

Received: May,03,2011 18:12:52

Correspondence Type: Web Form

Correspondence: Being a Travel Facilitator-Interpreter in the Southwest of the US and bringing in hundreds of foreign tourists and much needed tourist dollars, I believe it is of utmost importance to take care of our Parks and Wild life. It is a win win situation for everyone and all wildlife in the Parks which attract the tourists in the first place. I am amazed at the shortsightedness of our officials who are ultimately on our payroll but do not serve us.

Correspondence ID: 2711 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area is one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined.

However, human activity and recreation is causing much damage to the park and the animals that inhabit it. To remedy this problem I urge that the following reforms be undertaken:

--Wildlife habitat deserves a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

These reforms will better protect the park and its natural beauty. Please enact them now.

Correspondence ID: 2712 **Project:** 11759 **Document:** 38106

Received: May,03,2011 18:47:14

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area is one of the most important conservation areas in the United States. It possesses more endangered species than possibly any other single conservation area. yet as an urban retreat it is threatened.

Encroaching development needs to be addressed, as well as contained and restricted to peripheral areas of the park. There is also a need to control congestion and one way to resolve this issue is to build more paths and other facilities so that horse riders, et al would have their own facilities and there would thus be less congestion on the paths that support most of the visitor use.

Off-leash pets, especially dogs need to be controlled and restricted to designated areas, this would ease pressures on endangered species inhabiting the park, and which face declining populations (domestic pets sometimes prey on park wildlife).

Overall conservation measures need to be improved so that recreation does not undermine the park's ecological integrity and so that visitors will be assured of the same remarkable experience that has long been the hallmark of this gem of our park system.

Correspondence ID: 2713 **Project:** 11759 **Document:** 38106

Received: May,03,2011 18:53:18

Correspondence Type: Web Form

Correspondence: While the public at large may prefer unfettered access to all areas of the park, prudence dictates that some areas or activities will be restricted or limited. This is the only way to protect the park for all of its users i.e. the public and its more or less full time residents.

Correspondence ID: 2714 **Project:** 11759 **Document:** 38106

Received: May,03,2011 19:02:32

Correspondence Type: Web Form

Correspondence: Your draft document is excellent.

Correspondence ID: 2715 **Project:** 11759 **Document:** 38106

Received: May,03,2011 19:34:05

Correspondence Type: Web Form

Type:

Correspondence: As a frequent visitor to the Golden Gate National Recreation area I am very concerned about impacts to wildlife from human activity and from dogs. The park's mission is to protect natural resources of the park, not allow recreation to undermine them.

Specifically, I am writing to urge that unregulated off-leash dog recreation be banned on more beaches and trails in the park, in order to protect species like the western snowy plover. Since the park is home to more endangered and threatened species than any other park in the continental U.S. I would like to see wildlife habitat receive a higher level of protection from human disturbance. The compliance rate should be 95%, not 75% as outlined.

The park service should require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

I would also like to off-leash recreation limited to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your consideration of my comments.

Correspondence ID: 2716 **Project:** 11759 **Document:** 38106
Received: May,03,2011 19:36:50
Correspondence Type: Web Form
Correspondence: enhance this gem of an urban park and its inhabitants.

Correspondence ID: 2717 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Hello, I am writing regarding the Golden Gate National Recreation Area. As a former Bay Area resident and bird lover, I hope that this wonderful area is protected! As I understand it, the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Please keep unleashed dogs out of the park!!!

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Mary Beth DeHamer

Correspondence ID: 2718 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Please protect wildlife on beaches in the GGNRA.

Correspondence ID: 2719 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: Please take appropriate action to protect Snowy Plover at Golden Gate Recreation Area

Correspondence ID: 2720 **Project:** 11759 **Document:** 38106

Received: May,03,2011 21:39:45

Correspondence Web Form

Type:

Correspondence: I am a resident of San Francisco and I love the GGNRA. It is a very special place and a valuable natural resource for all Americans. I also am a dog lover and although I do not presently own a dog, I have had dogs all my life. I grew up in San Francisco and as a child I enjoyed walking Ocean Beach every weekend with my Cocker Spaniel.

I know full well how much dogs enjoy running on the beach. I also know, now that I am grown, that dogs are not loved by all. They can harm natural places and wildlife. They can scare children and older citizens. Most dog owners are responsible pet owners, but not all dog owners are. Those owners cause most of the problems that occur with dogs. Sadly the dogs have no say in who owns them. In an area as congested as SF, there are too many dogs and this also causes problems.

I do believe that dogs need places to run and play. I am not so sure that this should be unregulated and within one of our National Parks. We must do everything we can to protect the natural environment of the GGNRA. Areas like this are rare and need our protection. Dog owners must be helped to

understand that the GGNRA is not their personal playground.

I do not support off leash areas within the GGNRA.

Correspondence ID: 2721 **Project:** 11759 **Document:** 38106
Received: May,03,2011 21:58:51
Correspondence Type: Web Form
Correspondence: Please consider limiting the areas in which dogs can be walked or unleashed to those that hold no attraction for nesting Snowy Plovers.

Correspondence ID: 2722 **Project:** 11759 **Document:** 38106
Received: May,03,2011 22:19:51
Correspondence Type: Web Form
Correspondence: To Whom It May Concern,

Golden Gate National Recreation Area needs to be protected. How much is it to ask that people keep their dogs on leashes, if that's all it takes to preserve this area. I believe that we need to do everything we can to protect the species that make their homes here.

Correspondence ID: 2723 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's are public wealth. They have an important purpose and mission is to protect the natural and cultural resources. Recreation must not be allow undermine it.

Animal and plant life are public treasures representing gene pools and genomes humans can never recreate. Endangered species wildlife habitat deserve a higher level of protection from human activities; the compliance rate should be 98%, not 75% as outlined. PLants are a source of many pharmaceuticals and they and animals feed eco systems upon which people depend. We cannot afford to loose life forms and species.

The park must accommodate diverse park user groups, runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Dog owners are notorious for off leasing their dogs. The Department does not have the funds to supervise leash laws, so banning dogs on most trails makes good business

sense and protects seniors and children.

All off-leash areas should be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thanks! lm

Correspondence ID: 2724 **Project:** 11759 **Document:** 38106

Received:

May,03,2011 00:00:00

Correspondence Type:

Web Form

Correspondence:

Please strengthen your efforts to protect the biodiversity of Golden Gate National Recreation Area. For example:

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for listening to these thoughts. Oliver Medzihradsky

Correspondence ID: 2725 **Project:** 11759 **Document:** 38106

Received:

May,03,2011 00:00:00

Correspondence Type:

Web Form

Correspondence:

The Golden Gate National Recreation Area is a wonderful place. I've been there several times and have happy memories. It should be kept and expanded for the betterment of the natural and cultural resources, and recreation should not be allowed to undermine the other uses for conservation, protection of endangered species, etc.

Since the park was created, there have been many diverse park user groups, such as runners, horseback riders, families, and those with service animals, plus many dog owners bring their pets for recreation. Sometimes the groups do not mix well and several alternate trails should be considered for the comfort and safety of the different groups (such as seniors and handicapped,

people with young children or service animals might prefer a slow moving easy walking path. Horseback riders, runners (with or without dogs) and young people would prefer the fast track. Also more beach areas should be free from dog recreation since dogs can be quite disturbing to others on the beach.

All off-leash areas should be enclosed to protect park users, wildlife, and other dogs. Some dogs are not disciplined enough to be off a leash anywhere but their own homes and there might be warnings and fines for those whose dogs injure or seriously disturb others. These paths should be where they will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2726 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Correspondence ID: 2727 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:01:57
Correspondence Type: Web Form
Correspondence: I live on Ocean Beach and visit the beach on a daily basis. I am not a dog owner, but I genuinely love and respect all animals. The issue involves, of course, the owner and not the owned.

Right now the vast majority of dogs run free on all sections of the beach. Dogs are not under control by their owners either by voice or leash. I've seen the signs posted to protect endangered species of birds on the beach, and the big metal bird, but these prohibitions are ignored by most owners. Further, I have never seen any attempt by a GGNRA officer to enforce the existing codes. Indeed, how can anyone stop a running dog not on a leash from violating the protected space in season? Or attacking another animal? Or worse, attacking children and others who want to enjoy the beach?

I have seen wildlife mutilated and killed by unleashed dogs. Not a day goes by when there is not conflict between unleashed dogs. On sunny, busy weekends the situation is anarchic. Now, dogs like me and I like them. But if I were someone who feared animals, taking a stroll on Ocean Beach surrounded by uncontrolled hounds the size of ponies would be daunting indeed. There are often very small children playing on the beach. Kids are in constant danger of being harmed either intentionally or unintentionally by uncontrolled animals.

I don't care how well trained a dog is, voice control is ineffective on crowded beaches with hundreds of other unleashed animals.

I think all dogs should be on leash in all areas of the beach. Uncomplicated. Clear to all concerned.

Those who do not own dogs, however, do not have attorneys or lobby to further their interests. I only found out about this comment period via a sign posted on a trail I use to walk to the beach. So all of the beaches, parks and other recreational areas now truly "belong to the dogs."

Correspondence ID: 2728 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:10:51

Correspondence Type: Web Form

Correspondence: I'm a San Francisco resident IN FAVOR of GGNRA's proposed changes. My wife and I volunteer every month at GGNRA sites for trash and invasive plant species removal. We often see how off-leash dogs disturb the wildlife. In some areas, such as Fort Funston, off-leash dogs dominate the landscape and cause anxiety. Thank you for your intelligent proposal.

Correspondence ID: 2729 **Project:** 11759 **Document:** 38106

Received: May,04,2011 02:28:50

Correspondence Type: Web Form

Correspondence: Please help protect our parks & all the animals in them.

Correspondence ID: 2730 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear National Park Service staff:

I write to urge the NPS to protect the Golden Gate National Recreation Area's imperiled wildlife from harassment by unregulated recreation. Please consider the following points and recommendations:

--NPS's mission is to protect natural and cultural resources in the National Parks and National Recreation Areas, not allow recreation to undermine these resources.

--Habitats for endangered species of wildlife deserve a higher level of protection from human disturbance, say a compliance rate of 95% or higher, not 75% as proposed.

--The plan for the Golden Gate National Recreation Area should better accommodate diverse user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. --Limit off-leash dog recreation to areas where there will not be negative impacts on sensitive wildlife and habitats. Such off-leash areas should be enclosed to protect park users, wildlife, and other dogs.

Thank you for be open to input from the public.

Sincerely,

Douglas Daetz Sunnyvale, CA 94087

Correspondence ID: 2731 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: please protect the wildlife.

Correspondence ID: 2732 **Project:** 11759 **Document:** 38106
Received: May,04,2011 05:45:35
Correspondence Type: Web Form
Correspondence: Dogs should NOT be allowed to run lose to torment ground birds as well as any other small animals. Please stop this cruelty to our native wildlife now,

Thank you!

Janet E Geren

Correspondence ID: 2733 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: We urge you to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as

runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for the opportunity to provide input.

Correspondence ID: 2734 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: n/a

Correspondence ID: 2735 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect the snowy plover from recreation. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Please require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs, and limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Thank you.

Correspondence ID: 2736 **Project:** 11759 **Document:** 38106
Received: May,04,2011 07:43:22
Correspondence Type: Web Form
Correspondence: Please do all that is necessary to protect Golden Gate's wildlife from human intrusion. There is no reason for us to tramples on every part of our natrual resources. Those of us who care about the wilidlife and plants have rights, also, and most certinally do those who were here first and are dependent on us to protect them.

Correspondence ID: 2737 **Project:** 11759 **Document:** 38106

Received: May,04,2011 08:55:40

Correspondence Type: Web Form

Correspondence: Please help protect the wildlife in Golden Gate Park by requiring dog owners to keep their dog(s) on a leash when in the park. Such a requirement would not only protect the park's wildlife but would make visiting the park more enjoyable to other patrons as well, because encountering a dog off-leash is not only disturbing to wildlife but can also be frightening to humans.

Correspondence ID: 2738 **Project:** 11759 **Document:** 38106

Received: May,04,2011 09:03:09

Correspondence Type: Web Form

Correspondence: Please help protect one of the few remaining natural areas in the bay area.

Correspondence ID: 2739 **Project:** 11759 **Document:** 38106

Received: May,04,2011 09:06:45

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area land provides a unique and special national park experience near a heavily urbanized area. The park is home and habitat to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned.

However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

I have a dog and have had dogs during many periods of my life - my family as well - however, our recognition and respect for the other areas of Nature require us as owners and thinking, cognizant human beings to control our pets for the protection of those in Nature that cannot protect themselves.

That is our duty as aware and compassionate human beings with respect for what Nature has provided.

I Urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation and development activities. We need to upgrade our compliance rate to 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. This solution is perfectly all right for most if not all dog owners. They are grateful that their dogs are enclosed and protected as well. By Limiting off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats, this will allow delicate wildlife (hatchlings etc) to be protected during the time when they are small and vulnerable.

Thank you for giving imperiled species a chance to survive.

Sincerely, Portland H. Coates San Francisco, CA

ps My family first arrived in the Bay Area in 1840. We have always been here and always respected it. All through the Gold Rush and the Great Quake and Fire - and we have loved and protected the wildlife and natural areas of this State. We continue to do so. Thank you. phc

_____ This message was sent to
by the National Parks Conservation Association. E-mail us at
TakeAction@npca.org, write to us at 1300 19th Street, NW, Suite 300,
Washington, DC 20036, or call us at 800.NAT.PARK (800.628.7275).

Can't see this message? View it on the NPCA Website.

Correspondence ID: 2740 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine them.

--Endangered species wildlife habitat deserves a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Correspondence ID: 2741 **Project:** 11759 **Document:** 38106

Received: May,04,2011 10:10:43

Correspondence Type: Web Form

Correspondence: As a member of the Pacifica Shorebird Alliance I have tried to lend my support to the group in various ways including activities to monitor and protect the roosting colony of a federally listed threatened species of Snowy Plovers at Pacifica State Beach. This has involved periodic observations that included sending counts and related data to rangers at Half Moon Bay State Park. However our most extensive effort has been to try to convince the City of Pacifica to establish an effective protection program including dog restrictions near the roosting area, leash law enforcement, informational signs/kiosks, symbolic fencing, new permanent fencing to dissuade trespassing on the SP zone, etc. It has been an uphill battle as this is a popular beach with dog walkers, surfers, fisherman and the general public, and the city is reluctant to stir up public ire with any significant restrictions.

A reasonable, publicly accepted and scientifically defensible program re: dog management in GGNRA would certainly help us in our struggles with the powers that be.

Correspondence ID: 2742 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Melinda Burgess

Correspondence ID: 2743 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2744 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you

Correspondence 2745 **Project:** 11759 **Document:** 38106

ID:

Received: May,04,2011 11:02:41

Correspondence Web Form

Type:

Correspondence: Having off leash dog walking areas in San Francisco is imperative for dog owners, especially for those of us who live in apartments or flats without outdoor space. I think that Crissy Field, Baker Beach, Ocean Beach, Fort Funston and the trail between Ocean beach and the Golden Gate bridge should continue to be off leash areas.

The sensitive habitats should be clearly marked as the plover area is at Ocean Beach and areas along the beach at Crissy field. On the walking path above Sutro baths, dogs should be controlled so that they stay on the trail. Where sensitive habitats are concerned people should be cited if they are out of compliance.

My dog is about 10 pounds. I clean up after her 100% of the time and she is so small that her environmental footprint is close to negligible. We used to run around the dirt track at the polo field in GG Park (not an environmentally sensitive area), but recently rangers have begun giving warnings about off leash dogs. So I have now chosen to take her to the above mentioned areas where dogs can run off leash. I would hate to see our range of places limited even further.

Also, because my dog is so small, she needs to exercise in a large area where she can find space a good distance from big dogs who could injure her with their rouch play. Most dog parks do not have enough space to accomadate both large and small dog areas. The above mentioed sites are the only place that I know of with enough space for all to enjoy.

Correspondence ID: 2746 **Project:** 11759 **Document:** 38106

Received: May,04,2011 11:19:51

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean, I am writing as a resident of San Francisco, someone who works in the GGNRA (in the Presidio), a member of the GGNPC and an animal lover.

I agree with you that it is possible to strike a balance between protection of native species such as the Snowy Plover and dog and dog owners. However, I feel that stronger measures can be taken to protect the park and its habitat.

Specifically, I believe that: 1) Off-leash areas should be fenced or at least well-marked and boundaried. 2) The proposed compliance level should be set at 95%, and measures to improve compliance should be instituted. 3) Commercial dog walking in the GGNRA should not be permitted. 4) At least some trails should be closed entirely to dogs, i.e. reserved for walkers. 5) It is important to take into consideration adults and small children who may not want to interact with dogs at every place in the GGNRA. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.

Thank you very much for taking community input into consideration.

Sincerely yours, Tomi Nagai-Rothe

Correspondence ID: 2747 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as

runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. My 2 small kids are not comfortable with dogs, and the presence of unleashed dogs remove from enjoying the peacefulness of a park.

I would like to require to completely forbid off-leash dogs within the park boundaries.

Sincerely,

Remi Zajac

Correspondence ID: 2748 **Project:** 11759 **Document:** 38106

Received: May,04,2011 11:26:41

Correspondence Type: Web Form

Correspondence: A lot of careful and responsible work has gone into this document and it shows. The preferred alternative appears to me to be the best choice in about every case, not surprisingly, considering the professional perspective and preparation of those developing the report. Thank you.

Particularly, the recommendation to limit off-leash dog walking is welcome.

Sadly, "voice-control" and "sight-control" turn out, in practice, to be overly-optimistic euphemisms for only slightly bridled off-leash activity. Anyone who is paying attention knows this results in routine violation of the environment and park visitors, despite the very best intentions of responsible dog owners. Also sadly, not all visiting dog owners are responsible, patently obvious to even the casual observer. The leash (with an owner on one end) is the only possible route to reasonable management of our canine friends in the GGNRA.

My only serious doubt about the preferred alternative is the permission of commercial dog-walking in the National Park period. Why on earth should commercial ventures be subsidized in this manner? Periodic field trips for students or a tour group of some type, or "Doggy Day at the Beach" I understand. . . whatever. But this kind of routine, daily wear and tear on the resource and its guardians? Commercial dog walking is too big of an impact on the GGNRA.

Thank you for your attention and efforts.

J.Malcolm Hillan Instructor Environmental Horticulture City College San Francisco

Correspondence ID: 2749 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I greatly appreciate our national parks. I was a seasonal park ranger for 6 seasons, and I have come to understand the uniquely beneficent mission of the USNPS. Dogs have always been a problem with wildlife and habitat disturbance. There is no place for dogs in sensitive areas. Dogs are a threat to vegetation and wildlife. If dogs are allowed in recreation areas, they should be leashed or in controlled areas only, where risk to natural and cultural resources of our parks is not possible. Note that I am aware that dogs serving the blind are in an excluded category.

Protecting endangered species wildlife habitat should be a high priority for the management plan. Therefore, endangered species wildlife habitat deserves a higher level of protection from human disturbance. The compliance rate should be at least 95% or more, not 75% as outlined.

I also am not a big fan of horses in our parks, but that is another issue. Horses destroy the land and make a mess for hikers. They should be banned from National Parks, just like mountain bikes should be banned.

But back to the issue at hand, national parks and recreation areas are unique. They have a higher standard of protection than other managed resources in the US. It is important that the public understand such issues. Therefore, all the trails and beaches should be free from dog recreation. Do you remember the outrage when smoking was banned? Do you now appreciate the outrage expressed when people light up in public places? We must institute regulations so that people understand that dogs should be, like OHV's, restricted to sacrifice areas.

Therefore, it is imperative that all off-leash areas be enclosed to protect park users, wildlife, and other dogs. Additionally, off-leash recreation areas should be in areas where there is no risk of negative impacts to sensitive wildlife and habitats.

Golden Gate National Recreation Area serves millions of people, and management of the human users and natural resources is challenging. It is important to protect imperiled species, and it is important that the plan emphasize such protection as a priority.

I thank you for your dedication to the parks and to the protection of the biodiversity in the bay area.

Sincerely, John N. Nishio

Correspondence ID: 2750 **Project:** 11759 **Document:** 38106

Received: May,04,2011 11:29:50

Correspondence Type: Web Form

Correspondence: The idea of placing limitations to beach areas for dogs bothers me greatly. I take my dog to Fort Funston from time to time, as it was one of the attracting reasons to move to the Bay Area in the first place. I am really disappointed in the city's consideration of disallowing canine exercise on these beaches. Being a conscientious dog owner, I always clean up after my dog and do not allow him to dig or carry out other destructive behaviors. I think regulations to limit access at certain times of the year for nesting birds is acceptable. But I really hope that Fort Funston can remain a wonderful visiting spot for my dog and I, even if it is at certain times of the year. Perhaps the city can increase ticketing on the beaches to non-compliant citizens in order to increase revenue. Our dogs are part of the natural environment too!

Correspondence ID: 2751 **Project:** 11759 **Document:** 38106

Received: May,04,2011 11:38:30

Correspondence Type: Web Form

Correspondence: Nature, love, and the phenomenology of dog walking

It's hard to describe the feeling of freedom and joy I have when I'm out walking with Shadow off leash in the beautiful locations within the GGNRA. It's like we are two adventurers exploring our environment. Off leash, Shadow can trot a few feet ahead and sniff out seemingly unremarkable spots in the grass. Or he will follow a scent along the path, his nose guiding him in circles and curving patterns, until he comes to the spot he was looking for. I glance down - nothing is there. But I'm wrong, because Shadow, with his enhanced senses, told me that something was there , revealing an invisible world I never knew existed. The adventures I have with Shadow remind me, even if symbolically, that there is more to life than what we can see.

These nature walks with Shadow connect me to the natural world in a way I've never known. Before Shadow came into my life, I would never consider walking on the beach in the cold fog, yet the beauty of the fog, in its many forms, is awe-inspiring. Nor would I be out in extreme wind conditions, with sand racing across the beach, yet the intricate patterns formed in the sand are magnificent. Nor in the rain, walking among the dunes of Fort Funston, marveling at the mushrooms that exploded overnight - all the different shapes and colors. I had no idea there was such beauty! But

Shadow, my nature guide, got me out in this weather, and made me fall in love with these places and their magical hidden treasures. And the routine of going there regularly, day after day, instead of the occasional sunny day like I did before Shadow (that part of my life I now refer to as "BS" (before Shadow)), is that you can see the subtle beauty and changes, like getting to know its different moods.

And the happenings that can occur strike deep to the heart, like that time in an extreme wind at Fort Funston - one so strong that no reasonable person would be there. Except Shadow, my nature guide, insisted, so there we were. Bracing myself against its force, I ducked into the grove of trees on the horse trail and stood silently in refuge. Then in an instant, a great horned owl flew in and landed on a branch not 10 feet from me. It was incredible, its wing span at such close range, and the grace of its landing. It was also escaping the wind. Then he turned his head, his wild stunning face catching a glimpse of me, and flew off again. It was just a brief moment in time, but was timeless. We had an intimate shared experience; a magical interaction that left a permanent impression.

It's these moments that connect us to the beauty and profundity of nature - something we are losing in our increasingly digitized virtual worlds. They make us stop and catch our breath, and remember what it feels like to be alive. They are deeply meaningful. Yet I fear they are not captured in the NPS's current Environmental Impact Statement for its Dog Management Plan. My owl experience would probably be characterized as harassing wildlife, because my presence, even in my stillness, caused the owl to fly off. But we must remember that environmental stewardship depends on these experiences. For it is people who will save the earth. And like someone once said, you can't save what you don't love. Shielding us from these experiences, even in the name of protection, makes nature something of an abstraction. And I don't think people will be motivated to save an abstraction. So I want the NPS to know the good service my dog Shadow is providing as my nature guide, getting me off the couch and out into our parks, whether rain, wind or fog, and keeping me in love with our natural world.

Correspondence ID: 2752 **Project:** 11759 **Document:** 38106
Received: May,04,2011 11:46:42
Correspondence Type: Web Form
Correspondence: I want to go on record that I am opposed to the new proposed plan which will restrict activities for dogs on some of the areas which fall under your jurisdiction.

I use these areas and very much appreciate the dog walking and off-leash

areas provided. From my personal experience people do clean up after their dogs and this is true even in very heavily used areas such as Fort Mason, Crissy field, etc.

I believe there may be more dogs than kids in San Francisco. The dogs should at least have the opportunity to run free in enough areas to keep them and their owners happy.

Keep the status quo!

Steven Gunders

Correspondence ID: 2753 **Project:** 11759 **Document:** 38106

Received: May,04,2011 11:57:22

Correspondence Type: Web Form

Correspondence: Please retain these provisions in the plan:

7 limit off-leash recreation to areas where it will have no negative impacts on sensitive wildlife and habitats;

7 provide more trails that are free of dogs (currently, only 1 trail in San Francisco will be available for those who do not wish to interact with dogs);

7 limit dog walkers in the park to 3 dogs and do not permit commercial dog walking;

7 implement compliance-based adaptive management that requires at least 95% of dog walkers to comply with the new regulations.

While the voice of local dog owners has been loud and sometimes hysterical in influencing decisions about how open space is used in the SF Bay Area, it has never been clearly determined that they are the majority view. The guidelines above would accommodate the vast majority of those of us who wish to continue to enjoy the GGNRA as a natural area, not a wildlife-free dog park. If critical ecological damage is done to habitats or species from the excessive presence of dogs, the Park Service simply opens itself to hugely expensive remediation efforts and possibly even lawsuits as a result.

Correspondence ID: 2754 **Project:** 11759 **Document:** 38106

Received: May,04,2011 12:07:55

Correspondence Type: Web Form

Correspondence: Please do not make it more difficult for dog lovers to utilize these areas. If

for no other reason evaluate the potential resources that you will lose. Despite the difficult economy that we have been struggling through, the pet industry has continued to grow! It is estimated that the Pet Industry will be a \$50 Billion Dollar industry this year. This means that even in economic down turns people continue to spend money on pets. People just simply love their pets. Therefore, if you make it difficult for people with dogs to visit your area you will be likely making it less desirable to travel to the Golden Gate Recreational Area, and therefore losing the revenue that they would spend. Our state has enough financial problems right now. Don't increase these problems by keeping the huge community of dog lovers away!

To get facts about the pet industry and its size and revenue please visit the American Pet Products Association's website at www.americanpetproducts.org.

Thank you, Lauren Bellew

Correspondence ID: 2755 **Project:** 11759 **Document:** 38106
Received: May,04,2011 13:44:58
Correspondence Type: Web Form
Correspondence: Golden Gate Park is a treasure! Care should be taken to protect ALL wildlife species, trees, plants, and ecosystems. We are the caretakers!!! It is our duty to preserve and protect in every way possible. Please take action to fulfill this critical role, before it is too late!

Thank you.

Sincerely, a bay area resident.

Correspondence ID: 2756 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not to allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. Compliance with the Endangered Species Act and the Migratory Bird Protection Act require that activities which harass and put these birds and other endangered species at risk must be stopped. It is not optional. No matter how much dog owners protest, off-leash recreation must be limited to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you for helping to create a better park experience at Golden Gate National Recreation Area,

and for giving imperiled species a chance to survive.

Correspondence ID: 2757 **Project:** 11759 **Document:** 38106
Received: May,04,2011 14:09:26
Correspondence Type: Web Form
Correspondence: Please protect one of your greatest assets!

Correspondence ID: 2758 **Project:** 11759 **Document:** 38106
Received: May,04,2011 14:12:07
Correspondence Type: Web Form
Correspondence: May 4, 2001

To: GGNRA RE: GGNRA Dog Management Plan Environmental Impact Statement

RE: Dog Feces and Smells as mentioned in the report

To Whom It May Concern:

My name is JoAnne Tybinka Blasko. I am a senior living in San Francisco and I walk daily on Crissy Field with my dog, Izzy. We also spend time at Ocean Beach, Baker Beach, Fort Mason, and the Marin Headlands. We love the freedom that the Bay area offers us for both on-leash and off-leash recreation.

Now that freedom is in jeopardy and we are greatly worried. We have spent hours reading the GGNRA DEIS and believe that the Preferred Alternative is overly restrictive and that the restrictions are not justified by the available data. The report is full of negative things that might or could happen; yet there is little data over the past ten years to indicate that they have happened. I believe that the lack of data indicates that they do not occur. (For example, on pages 20 and 29, the report mentions that disease "could" be transmitted to people from unpicked-up dog feces. However, there has not been a single case of dog-feces caused human illness reported by the SF Department of Health for over 50 years.

I believe that the dog owners in the bay area are exemplary in taking care to be sure that dog feces are picked up and that the areas where we have the privilege of on-leash and off-leash recreation are kept very clean. There are the occasional slips and many of these are not from dog owners who visit the parks on a daily basis but are from visitors to the park from out of the area who care less about keeping the place clean and sanitary. We have more and more visitors as the park is advertised and used by large groups.

Nowhere is it mentioned that the owners of off-leash dogs on the SF beaches provide an important service to the daily users of the beach; we clean the beach of debris each morning. One doesn't see the runners cleaning the beach or the many hikers who are marching for the cure cleaning the beach or the people who attend the many large functions that are promoted by the GGNRA as money-makers. Yet the report states that the presence of dogs negatively impacts the visitors' experience because of smells etc. (Pg. 30) The visitors would be negatively impacted if the debris that is removed daily were still there when they arrive for their picnics and play.

I believe the GGNRA DEIS should provide a more balanced look at the real situation on San Francisco beaches. I wonder if it is written by people who actually spend time there.

Sincerely,

JoAnne Tybinka Blasko

Correspondence ID: 2759 **Project:** 11759 **Document:** 38106
Received: May,04,2011 14:16:21
Correspondence Type: Web Form
Correspondence: May 2, 2011

TO: GGNRA

Re: Draft Dog Management Plan / Environmental Impact Statement Dog Owners held to Higher Standards than other User Groups

To Whom it May Concern:

I am Peter P. Blasko. I am a senior, resident of San Francisco for over 50 years, and I have a dog.

I believe that dog owners are being held to significantly higher standards than other GGNRA users. I see children running all over the plover restricted areas at Crissy Field but one dog running off-leash through that area is cause for great alarm. Another example: tourists renting bicycles zoom down the hills of Ft. Mason with no safety restrictions and no bike lanes and an accident is waiting to happen; yet dogs are assumed to be the big safety hazard.

The Preferred Alternative condemns every dog owner for the actions of a few irresponsible owners. For example, 94% of dogs do not chase birds (and

those that do mostly chase seagulls) yet all dogs are excluded from a majority of Ocean Beach to protect birds. I believe the GGNRA should focus on those dogs that do chase birds rather than all dogs. I also note that the 1999 Hatch Report observed 5,692 dogs at Ocean Beach and only 19 were observed to chase snowy plovers and that is one-third of 1%. Pg. 28.

San Francisco dog owners are responsible. Why not treat them that way and let us continue to have the privileges that we have had in the past and assume we will self-monitor? We've been doing this successfully for years. We do not have to be brought into line with other National Parks. We live in an urban area that must serve everyone and dog owners represent a large share of the park's constituency.

Sincerelly,

Peter P. Blasko San Francisco resident

Correspondence ID: 2760 **Project:** 11759 **Document:** 38106
Received: May,04,2011 15:11:51
Correspondence Type: Web Form
Correspondence: To whom it may concern,

I would like to offer the following comments on Dogs in the National Parks and National Recreation Areas

First of all, I would like to state for the record that I am not an Anti-Dog person. I grew up with dogs, and although I don't presently have any, I have had for most of my life.

I do however think that Canine use of NPS areas should be heavily restricted or controlled.

A few observations:

Dogs are by nature, invasive. When Dogs are off leash, they will and do chase and disturb wildlife.

In many areas there are signs and fencing to restrict Human beings from going off trail so as not to disturb various nesting / resting/ breeding wildlife, et. al.

Yet easily 96% of the time I am in an area, I see dogs off leash, running through the "protected" areas. Whether it is forest, dunes, lava beds, etc,

chasing each other or wildlife.

Dogs destroy the landscape:

It's illegal to remove materials from NPS's and NRA's: Yet dogs are allowed to root, dig, and defecate freely. This is damaging to the areas flora and fauna.

Despite clearly posted signage stating that Dog owners must pick up after their dogs, I continually observe this being ignored.

As a point in fact, there are parts of Ft. Funston (GGNRA) in which smell of dog excrement is absolutely vile.

How can one enjoy the fresh salt air, and clean ocean breezes when one is trying not to retch?

We no longer allow smoking in Public areas. What's the difference? (I think I'd take being around cigarette smoke over this?and I don't smoke!)

Lastly, and I am quite upset about this: I am tired of being assaulted by dogs.

I like to run on average of 5 times a week. On average of about 1.5 times per week, when running, I get jumped on by one or more dogs. So far none have been overly aggressive. But I don't like it! (Usually this happens at Ft. Funston, GGNRA)

Professional dog walkers show up with literally a entire pack of dogs, I routinely see 5, 6, 7 at a time. Usually some are on leash and some are off leash, but even when they are all on-leash, it's still a mob. An obstacle that is difficult to avoid.

I don't want my tax dollars used to support private enterprise, that then however unintentionally, restricts the use of those areas which I am fully supportive of. Make the professional dog walkers go elsewhere. They are running a business. It's their problem. Again, there are Dog parks around. Go There.

Furthermore, if you have ever owned a dog or even two: That's easy. But after three, they develop the pack mentality. The dogs are in control at that point! I have yet to see a dog walker in complete control of their 5+ dogs.

Dogs are noisy. The "Quiet Enjoyment" of an area is essentially nonexistent when a great many dogs are about.

I realize that dog owners in the City want to take their dogs somewhere, other than around the block, But there are Dog Parks specifically for this. I think that is part of the responsibility of owning a dog in a big city.

Of course, I am from Eastern Washington State & Montana, so I don't think its very humane to even own a dog in a city. Which is precisely why I don't have a dog at the present time.

In any event irresponsible dog owners should not have the right to ruin those areas that are for all of us. The National Parks and national Recreation areas are for everyone, not just Dog owners.

In summation, I feel the following points would be fair to all:

1. Restrict the areas dogs are allowed. 2. Dogs should be on leash at all time in the NPS's & NRA's. 3. Toughen the fines and enforce the pickup of excrement. 4. Set the maximum number of dogs in an area or per person/group. (2?) Ban folks who show up with 4, 5, 6, + dogs. I love the National Parks System and while I understand that Dog owners want to enjoy these areas as well, they should not deter others the right to enjoy these areas as well.

Thank you for your time in reading this.

I am certainly happy to discuss this further if anyone should desire,

Sincerely,

Jeffrey L. Power

Novato, CA 94945

Correspondence ID: 2761 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2762 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

-Shawnee McLemore

Correspondence ID: 2763 **Project:** 11759 **Document:** 38106

Received: May,04,2011 15:48:35

Correspondence Type: Web Form

Correspondence: Dear GGNRA,

Dogs are a critical component to keeping our community vibrant and encouraging exercise and appreciation in the great outdoors. I urge you to continue to allow dogs in all current areas of the GGNRA jurisdiction and to

reject any additional restrictions.

Sincerely, Dana Gunders San Francisco, CA

Correspondence ID: 2764 **Project:** 11759 **Document:** 38106

Received: May,04,2011 16:00:05

Correspondence Type: Web Form

Correspondence: I would like to see dogs to continue to be allowed in the parks. Our national parks are a treasure that should be able to be shared with all visitors including dogs. Dogs and people should be able to equally enjoy our national beach treasures.

I visit Muir Beach weekly with my dog and have been doing so for about 7 years. I pick up trash as well on this day. I've had many people thank me when I am picking up trash. I feel it's a priviledge to live in this community and to be able to walk my dog at the beach. This is my way of contributing to the beauty of the beach for us all.

I believe the beach belongs to all of us who wish to mindfully visit.

Correspondence ID: 2765 **Project:** 11759 **Document:** 38106

Received: May,04,2011 16:23:59

Correspondence Type: Web Form

Correspondence: Please save the birds

Correspondence ID: 2766 **Project:** 11759 **Document:** 38106

Received: May,04,2011 17:15:35

Correspondence Type: Web Form

Correspondence: I support the Sierra Club's approach focusing on the most protective use of the land and natural environment. I believe that decisions on recreational use of the land should reflect a primary commitment to the flora and fauna of the natural habitat, and secondarily the convenience and desires of dog owners, or for that matter, cyclists, equestrians and hikers. With these principles in mind, I think we can manage to provide some degree of recreational use to all types of users.

"I support the National Park Service's Dog Management Plan, but hope the proposal would also require all off-leash areas be enclosed to protect park users, wildlife, and other dogs; limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats; provide more trails that are free of dogs; limit dog walkers in the park to three dogs;

and implement compliance-based management."

Thank you for your consideration of my opinion. Bob Kopelman

Correspondence ID: 2767 **Project:** 11759 **Document:** 38106
Received: May,04,2011 17:26:20
Correspondence Type: Web Form
Correspondence: Please help the imperiled wildlife in the Golden Gate National Park.

Correspondence ID: 2768 **Project:** 11759 **Document:** 38106
Received: May,04,2011 17:26:46
Correspondence Type: Web Form
Correspondence: We don't need to turn our National Parks into Dog Parks.

Leash laws need to be strictly enforced.

Correspondence ID: 2769 **Project:** 11759 **Document:** 38106
Received: May,04,2011 17:44:28
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean:

I'm writing to support the preferred alternative or stronger. Since the area I am the most familiar with is Ocean Beach, that's the area I'll speak about specifically but I support strong regulations in all areas..

I was at the SF Board of Supervisors meeting where we gave our comments and it didn't escape me that most of the speakers supported weaker regulations. I have to give it to the dog groups, they are very organized. They have the advantage of being single-issue focused. While it's good to listen to all sides, please don't give in too much to those who speak the loudest.

The dog groups claim that only a small minority are causing the problem, but they complain that 75% compliance is too high a bar. Every time I go to Ocean Beach, if shorebirds are there at least one dog is chasing them, usually more. There are so many dogs at the beach that a minority of those dogs are still enough to unnecessarily impact the birds. Even if they're not immediately dropping dead. As you know. Meanwhile the dogs go home and eat undisturbed.

A couple weeks ago I saw a dog owner deliberately throw a ball at a flock of shorebirds. Twice. .

Other cities in California and across the country have restrictions on dogs.

In most places there are no beaches for dogs to go to, and it doesn't seem to be an issue.

Thank you for reading this. I'm writing because the birds can't. Please keep the preferred alternative, or strengthen it.

Sincerely,

lyn

Correspondence ID: 2770 **Project:** 11759 **Document:** 38106

Received: May,04,2011 18:05:15

Correspondence Type: Web Form

Correspondence: I own a dog and even I am appalled at the lack of concern that some dog owners have for the surrounding environment. I am a full supporter of dogs being on leashes. I also think that all dog owners should have to carry waste bags when they are with their dogs in public places. Maybe it's a good idea to register DNA of all dogs in the Bay Area and if dog poop is left behind, it can be tested and the owners can be fined. My dog is always on a leash and I ALWAYS pick up after her. If I can do it, so can every other dog owner.

Correspondence ID: 2771 **Project:** 11759 **Document:** 38106

Received: May,04,2011 19:08:08

Correspondence Type: Web Form

Correspondence: I support Alternative A and E for the GGNRA Draft Dog Management Plan/EIS. As a former NPS employee (SER0), conservationist, and dog-owner, the alternative I absolutely oppose is Alternative D.

NPS policy on dogs in parks is discriminatory to tax-paying citizens who own dogs and based upon outdated and rigid management ideas geared toward the fact that the agency is historically poorly resourced. Thus, it is easier to ban troublesome practices than to manage for the benefit of the people. If usage of the park has increased, so should staffing. I certainly support increasing taxes or park fees to support adequate management, but not blanketly discriminating against an entire group of people (dog-owners) because that would reduce management's headaches.

Historically, people in SF walked their dogs in many areas before they came under NPS control and NPS made an agreement 20 years ago with those people to allow dog-walking and to back out of that agreement now for legalistic reasons or to suit management's interests is dishonorable. It is the reason many people have grown a negative view of GGNRA because of its

"BIG PARK" mentality. If you impose drastic restrictions on dog-owners you will be alienating many members of the public who would otherwise support increasing your resources. GGNRA is an URBAN park. Applying the same dog-policy as at Yosemite is ludicrous.

Correspondence ID: 2772 **Project:** 11759 **Document:** 38106
Received: May,04,2011 19:19:46
Correspondence Type: Web Form
Correspondence: Very good proposal fair and balanced. The national parks cannot be considered as private dog runs. Very damaging to wildlife, the environment, and other users.

Thank you for all your efforts

Correspondence ID: 2773 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Sir or Madam:

Golden Gate National Recreation Area park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2774 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. --

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2775 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2776 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Correspondence ID: 2777 **Project:** 11759 **Document:** 38106

Received: May,04,2011 21:36:47

Correspondence Type: Web Form

Correspondence: My vote is for Option A. It works if you have a friendly dog under voice

control. The key to making all of this work is moderation. If you have an aggressive dog or one you cannot call back to you, then use common sense and keep your dog on a leash. If you don't, you only give the non-dog folks plenty of reason to persist in restricting dogs in public places and prohibiting their freedom to run.

Correspondence ID: 2778 **Project:** 11759 **Document:** 38106

Received: May,04,2011 22:23:47

Correspondence Type: Web Form

Correspondence: I'm a dog lover who understands that endangered wildlife needs protection from human activity. That includes keeping dogs away from snowy plovers and other endangered plants and animals. We have plenty of places to take our pets off leash and dogs are certainly not endangered. PLEASE, PLEASE make the leash laws strong enough to protect wildlife!

Correspondence ID: 2779 **Project:** 11759 **Document:** 38106

Received: May,04,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Thank you for the opportunity to submit my comments. Here are my thoughts on protecting wildlife at this wonderful park:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Providing these paths could solve much of these dilemma.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. These should be large enough areas to allow pet owners and their animals wide enjoyment of the park as well.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Please enact these sensible guidelines. Thank you!

Correspondence ID: 2780 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please require all off-leash areas be enclosed to protect park users, wildlife and other dogs.

Please limit off-leash recreation to areas where it will have no negative impacts on sensitive wildlife and habitats.

Please provide more trails that are free of dogs (currently, only 1 trail in San Francisco will be available for those who do not wish to interact with dogs).

Please limit dog walkers in the park to 3 dogs and do not permit commercial dog walking.

Please implement compliance-based adaptive management that requires at least 95% of dog walkers to comply with the new regulations.

Thank you very much!

Correspondence ID: 2781 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

thanks for considering this. Best, Peter Kaplan

Correspondence ID: 2782 **Project:** 11759 **Document:** 38106

Received: May,05,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I support the National Park Service's Dog Management Plan. The mandate of our national parks is to preserve our national heritage for the benefit of all. Dog owners have had a disproportionate impact on public areas. The proposal should require all off-leash areas be enclosed to protect park users, wildlife, and other dogs; limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats; provide more trails that are free of dogs; limit dog walkers in the park to three dogs; and implement compliance-based management.

Correspondence ID: 2783 **Project:** 11759 **Document:** 38106

Received: May,05,2011 00:11:05

Correspondence Type: Web Form

Correspondence: I fully support GGNRA 's current proposal to regulate dogs on GGNRA property. I am the Volunteer Steward for the Oak Woodlands Natural Area in GG Park and a member of Sutro Stewards. Our family has always owned a dog. However , the dog lives with my sister in rural New Mexico. In our urban environment the remnants of fragile green space are at a premium and our native habitats and animal species are under pressure from all sorts of human activity. We think it is very appropriate to leash dogs when in these areas. Dogs are bred to be dependent on humans. It is a choice and a privilege to have a dog in an urban area. It is not a ' right ' . Therefore , we fully support GGNRA's proposals for dog management and urge you to resist the unreasonable demands of the hard core dog lobby. ROB
BAKEWELL

Correspondence ID: 2784 **Project:** 11759 **Document:** 38106

Received: May,05,2011 00:43:08

Correspondence Type: Web Form

Correspondence: Hello,

Points I want to make in regards to Sweeney Ridge. 1. The trails leading up to the nike site from Sneath at Sweeney ridge are paved and have daily truck traffic to service the water towers and antenna. I would imagine the environmental impact of the trucks would severely outweigh the small amount of k9 traffic. 2. The trails are very steep and there is no way for dogs to go off of the pavement. 3. The Sneath side of the park is very low foot

traffic which is mostly locals, many of which use the park to walk their dogs. 4. The majority of the paved lands at Sweeney ridge are owned by the water company, and are excluded from the GGNRA boundary map. What effect will this have on leash requirements.

What I want. Ideally for the current leash required laws at Sweeney Ridge to remain unchanged. Failing that, at least allow leashed dogs on the portion of the park that is paved.

Correspondence ID: 2785 **Project:** 11759 **Document:** 38106
Received: Mar,22,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent, Golden Gate National Recreation Area, Building 201. Fort Mason San Francisco, CA 94123-0022.

RE: Comments on Dog Management Plan

I am responding to the dog management draft plan as an individual user of park areas.

I have read the plan carefully and am very disappointed in how far the plan accommodates dogs and their owners and walkers as against the interests of human beings without dogs. It is clear that the dog owners and walkers have prevailed.

I want to mention two particular recommendations concerning Crissy Field that I find really awful. One proposal is to continue to allow dogs off leash on Crissy Field Beach. The dogs have owned the beach for years. And that means that the rest of us cannot use the beach with any comfort. The dogs are aggressive, jumping, barking, running, making the beach unsafe. There is dog poop on the beach. Children use the beach. And this is the only beach in San Francisco that is closest to the largest urban concentration of people. How much more sensible it would be to ask that dogs not be allowed on this beach and that other beaches in less urban areas be designated for their use.

Secondly, the walking path that connects one end of Crissy Field to the warming but is infiltrated with large numbers of dogs. Even on leashes, they fight, bark, and are aggressive. This path should be for people. It is an insult to the plaque that reads "a place to dream" to allow dogs to own this path. I have seen children picking up poop, accidents between bikers and dogs, and elderly people scared. I find it very unpleasant when the dogs are aggressive. Again, this is an urban walk, extremely close to very large numbers of people, and it should be for people not dogs. Many other places can accommodate dogs without such infringement on people. In addition, it

is highly unlikely that dogs off leash on the airfield will suddenly be on leash on the path. Now, they run back and forth between the airfield and the path. It is a terrible recommendation to allow dogs to continue on the path.

Of all the areas included in the proposed plan, the Crissy Field path and the beach are urban and closest to tremendous numbers of people. Their interests and safety should be paramount not the interests of dogs and their walkers. There are so many other places where the dogs can roam in the plan.

The recommendations concerning these two places are very, very wrong. I hope that your group will carefully consider these comments. Thank you.

Sincerely, John Sampson, San Francisco March 19, 2011

Correspondence ID: 2786 **Project:** 11759 **Document:** 38106
Received: May,05,2011 09:48:47
Correspondence Type: Web Form
Correspondence: Off-leash dogs should have a fenced in designated area away from scenic beaches and critical wildlife habitat.

I resent being out doors and having dogs out of control running past me, barking at me or sniffing. Most dog owners don't have them under voice control as they are supposed to be. The Snowy Plovers and other wildlife at Crissy Field beach need to be prote4cted by having dogs eliminated from that area. At the very least, the NPS should enforce the dog regulations they already have.

Ralph Pericoli

Correspondence ID: 2787 **Project:** 11759 **Document:** 38106
Received: May,05,2011 09:55:06
Correspondence Type: Web Form
Correspondence: What about a Mountain Bike EIR / plan? Have you seen the destruction that mountain bikes cause in the parks, especially in wet weather!?!? It is likely 100 time more environmental impact / destruction than any number of dogs!

Having a ridiculously restrictive dog proposal is highly hypocritical and pointless unless a equally restrictive bike plan is also implemented.

Why not just charge for dogs and bikes as a way to generate revenue and cut down on the impact while still allowing reasonable access? To burden of

enforcement will be no greater than it will be for the dog plans.

Correspondence ID: 2788 **Project:** 11759 **Document:** 38106
Received: May,05,2011 10:13:30
Correspondence Type: Web Form
Correspondence: Please take action to safeguard the wildlife at the Golden Gate National Park, under the GGNRA Draft Dog Management Plan / Environmental Impact Statement

Correspondence ID: 2789 **Project:** 11759 **Document:** 38106
Received: Mar,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 21, 2011 Frank Dean, General Superintendent, Golden Gate NRA Fort Mason, Bldg. 201 San Francisco, CA 94123

Congress created the GGNRA in the 1970's as the first urban recreation area, that hiking with our off-leash dogs is OUR form of recreation, and that severe restrictions are not justified by the Draft Environmental Impact Statement (DEIS). Please help us keep our parks - Help

Argument in favor of the status quo with room for compromise. Please read on:

I believe that the GGNRA thought they did their best to try to meet the guidelines set forth to examine the environmental impact on these National Park Areas but I am not sure they considered the other possible problems that would occur if they go with their recommended options...outcomes that would likely have a more extensive negative impact. Please read on:

1. I have been visiting Fort Funston for 17 years, 10 without a dog and 7 with one. During that time, I have brought my children there to get exposed to dogs and develop affection for them as opposed to fear. The dogs there are so friendly and non aggressive that this was the perfect place. I have brought out of town guests and they have stood in awe and envy of this wonderful place to enjoy, nature, California vistas and dogs and people... in a City to boot. Cities tend to isolate people from one another and here is one of those rare, and special places where you almost feel like you live in a small town with a sense of community...everyone running free and getting along. I get to know people who live in completely different parts of the City and we get to greet one another like neighbors when we do our ritual dog walks. Do you really want to destroy a San Francisco icon? When is the

last time you visited?

2. One argument I have heard concerns the dangers of dog bites and dog fights. I am skeptical that the instances of dog bites are greater or worse than those in the community at large. Of course they are greater than in places where there are no dogs....but this is not grounds for eliminating off leash dogs. I mean do we restrict teenager; from parks because they create a risk of broken glass?, or men from the parks because they increase the chance of rapes occurring?, or restrict children because they chase birds (and they do) or because of the litter they leave behind? In fact I would argue that dogs who are socialized at places like Fort Funston...socialized off leash being key here...this opportunity for dogs to socialize with humans and other dogs makes them better canine citizens and reduces any potential dangers they might pose in the community. I feel pretty safe in saying that the "vicious dogs" are not dogs that are socialized at Fort Funston. It keeps our City safer and our people safer and healthier by providing a place for dogs and people to run free and get exercise. Dogs as pets improve the health of the people who own them...and it is the obligation of the community to provide a place for those dogs and people to exercise together. On leash exercise is often insufficient and holding a leash can cause elbow and shoulder problems for owners.

3. What will happen to Fort Funston if you put these restrictions in place...even the shared plan? Because of the wonderful opportunity it provides, Fort Funston is heavily utilized by people and their dogs. Given the numbers that enjoy this wonderful place, it is always relatively spotless, free of litter and safe. This is because canine owners are some of the most civic minded, environmentally aware, concerned, involved and caring citizens. They do their best to take care of the place that they use so that it will continue to be there, they take responsibility for their animals and they pick up the feces, they do

Thank you for your assistance.

Sincerely, Glenn Visgitus

Correspondence ID: 2790 **Project:** 11759 **Document:** 38106
Received: Mar,22,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 20, 2011 Frank. Dean, General Superintendent GGNRA Fort Mason, Building 201 San Francisco, Ca 941.23-0022

Re: Rancho Coral de Tierra dog policy

Dear Mr Dean:

I am a resident of Montara who lives on the North end near the Rancho Coral de Tierra (RCT) open space adjacent to Montara. I walk the trails on a regular basis and have personal experiences that are prompting me to express this opinion on the dog policy.

First and foremost the area is teeming with wildlife. The area near Highway One has a newly restored wetlands. I see Blue Herons and other large birds in the open space on a regular basis. Off leash dogs are not compatible with the wildlife. Two days ago I came upon a Great Blue Heron on the trail and had about 5 minutes to quietly observe before off-leash dog walkers came along and spooked it. They made no attempt to leash their dogs when they saw the Heron. I have also observed dogs chasing terrified deer with no responsible humans in sight.

I have been threatened by growling off-leash dogs numerous times on the trails. The owners seem to think THEIR dog is not frightening to others. "He doesn't mean anything by it" is a common response to my concern. Voice/sight control is a joke.

We already have many local dog owners who do not obey the existing leash laws. They are vocal and seem to think their rights supersede the wildlife and other residents. This is wrong. To lessen the restrictions would be a big mistake and invite other park users to join those already threatening wildlife and humans.

Please establish the "Environmentally Preferred" Policy that is most protective of the resources, neighbors and visitors safety in RCT lands. At minimum dogs should NOT be allowed off-leash in Rancho Coral de Tierra at any time.

Thank you for protecting our Parklands.

Sincerely, Deborah Lardie

Correspondence ID: 2791 **Project:** 11759 **Document:** 38106
Received: Mar,22,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 20,2011 Frank Dean General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Re: Comments on Dog Management Draft Plan/DEIS

Dear Superintendent Dean:

I am writing to support the new policy to restrict off-leash dog walking. The behavior of dogs at GGNRA beaches is not only disruptive to the enjoyment of the area but is also threatening and potentially hazardous to people, especially children.

I have visited GGNRA beaches regularly for the past thirty-two years. Since the birth of my children, I have been particularly aware of the problems dogs pose to other beach users. When my children were infants, they were routinely bothered, terrorized, or knocked down by dogs chasing a ball thrown by its master or by a pack of out-of-control, "happy" dogs playing. If, after such incidents, I had a dollar for every time an oblivious dog owner said that their dog was friendly and loved children, I would be a very rich man. I grew tired of having to console my crying daughter after she was chased and/or knocked over by a dog at the beach. This was especially problematic at Crissy Field, so much so that we had to stop using the park entirely. This is not a live and let live situation - there are victims here.

I think that dogs should be banned from the GGNRA beach areas or be required to be on a leash. There are hundreds of acres in the nearby parklands for clogs to run free. Unrestricted off-leash clog access to the beaches is unacceptable due to the disruption and hazard it poses to individual users (especially children) of these natural areas.

Sincerely,

Harold A. Ball

Correspondence ID: 2792 **Project:** 11759 **Document:** 38106
Received: Mar,22,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 17th, 2010 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building #201 San Francisco, CA 94123

Re: Dogs

Dear Sir:

I find that the proposed "no dog" in portions of Pacifica to be stupid. I have a dog and walk him all the time. I also do beach cleanup three times a year.

Banning dogs from this area is really limiting to people with handicaps,

including my husband. Most of the areas are not very easy for handicapped people (parking or flat trails for walking).

You should leave things alone in Pacifica. They are fine the way they are. We don't need some government agency to tell us how to take care of our town. We do the cleanup, and are responsible dog owners.

Patti Kunakov Pacifica CA 94044

Correspondence ID: 2793 **Project:** 11759 **Document:** 38106
Received: May,05,2011 00:00:00
Correspondence Type: Web Form
Correspondence: As a dog owner and person who enjoys hiking I support the National Park Service's Dog Management Plan, but hope the proposal would also require all off-leash areas be enclosed to protect park users, wildlife, and other dogs; limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats; provide more trails that are free of dogs; limit dog walkers in the park to three dogs; and implement compliance-based management. I believe we must maintain the health of the these sensitive areas when it comes to our impact.

Correspondence ID: 2794 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 28, 2011 Frank Dean General Superintendent, GGNRA Building 201, Fort Mason San Francisco, CA 94123-0022

Dear Mr. Dean:

We are a dog-loving family who live in Cupertino, and often set Fort Funston and Crissy Field as heavenly destinations for our energetic and friendly little cockapoo. The parks afford good exercise for us all and soul-refreshment for the humans.

In all the years we have been driving up to San Francisco to enjoy Fort Funston and Crissy Field, we have been impressed by the conscientiousness of the dog owners and the admirable behavior of their pets. The grounds are amazingly clean of doggy-doo, the dogs are encouraged to be friendly and obedient, and human conversations around the watering holes have been congenial.

To be frank, we do not understand why, after all these years of thoughtfully

sharing these resources, there is a movement to restrict these parks against dog owners and their pets.

We wish to register our strongest opposition to the proposed changes in access to and use of Fort Funston and Crissy Field and to add our voices to the hundreds of others who also value these resources for healthy and positive canine/ human interaction.

Cordially, Eleanor W. Dickman

Correspondence ID: 2795 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 24, 2011 Frank Dean, General Superintendent Golden Gate National recreation Area, Building 201 Fort Mason, San Francisco, CA 94123-0022

Subject: Dog Management Plan

Mr. Dean,

As a very active 80 year old, I have been hiking in the Golden Gate National Recreation Areas for many years. However, over the past 10 years, I have given up walking in certain dog free areas for fear of being bumped or challenged by an off-leash animal. I just love the Crissy Field area but I must be realistic about these things and I now consider it off- limits for me.

I encourage you to return to the NPS guidelines. We don't allow dogs to run off-leash in our neighborhoods so why would we allow them to do so in these wonderful public areas?

Thank You,

Waldo Griffin

Correspondence ID: 2796 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean General Superintendent, Golden Gate NRA Fort Mason, Bldg. 201 San Francisco, CA 94123

Dear Mr. Dean,

We are writing to oppose the proposed Dog Management Plan for the Golden Gate National Recreation Area. We are long-time residents of San Francisco. We have been responsibly walking our dogs at Fort Funston, Crissy Field, Marin Headlands and other locations in the GGNRA for many years. Our current dog has recently earned his Canine Good Citizen certification from the AKC. Our dog are always either on-lead or under voice control.

We are long-time environmentalists and strongly support laws and regulations that protect the environment, but not this one.

Daily walks with our family, friends and our dogs in the GGNRA is an important part of our social life. It also plays a major role in our exercise program for keeping healthy.

Wildlife in the GGNRA needs protection but the proposed GGNRA plan is too extreme. The San Francisco Bay Area is a heavily populated urban area where multiple needs have to be balanced. The proposed GGNRA plan does not sufficiently protect the needs of people compared to the needs of a relatively small number of birds.

In addition, prohibiting dogs in the GGNRA will force dog owners to use other dog parks in the city causing overcrowding in the dog parks and parking problems in surrounding neighborhoods.

We respectfully urge you to actively oppose this extreme and counterproductive proposal.

Sincerely,

Kevin and Beth Shannon

Correspondence ID: 2797 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing you to urge you not to implement any additional restrictions for dog walking in the new GGNRA dog management plan. My family frequently goes to Fort Funston, Ocean Beach and Crissy Field to walk our dogs. Being able to walk our dogs off leash makes the walk more enjoyable for both people and dogs. Doing this is important to our quality of life. If this opportunity is taken away from us it would have a big negative impact on our lives. When I go to the GGNRA I always see other people benefitting

from being able to walk dogs off leash as well. So I implore you to preserve the current off leash areas in the new management plan so I and many others will continue to benefit from them.

Sincerely,

Kenji Okamoto

Correspondence ID: 2798 **Project:** 11759 **Document:** 38106

Received: Apr,05,2011 00:00:00

Correspondence Type: Letter

Correspondence: April 1, 2011 Frank Dean General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123

Dear People:

This is regarding the Draft Dog Management Plan/DEIS

Dogs running around without a leash are a major problem in the Golden Gate National Recreation Area. Too often the dogs get too close to people who are afraid of them, barking wildly. I see them on trails, such as the Battery to Bluffs Trail, where they are not allowed. I would also like them to be required to be leashed in areas like Baker Beach where they share space with pedestrians enjoying the Coastal Trail. There are enough dog running areas where dogs may run unleashed in San Francisco that there is no reason they should be terrorizing pedestrians and wildlife in the Golden Gate National Recreation Area.

Please adopt a plan that regulates dogs more strictly and enforce it.

Sincerely, David Zebker

Correspondence ID: 2799 **Project:** 11759 **Document:** 38106

Received: Apr,12,2011 00:00:00

Correspondence Type: Letter

Correspondence: Re: GGNRA Dog Management Plan/Draft Environmental Impact Statement

Dear Mr. Dean;

As a resident and dog owner in the City of San Francisco, I have enjoyed hundreds of Saturday mornings walking my dog at Crissy Field. Crissy Field is one of the few clean, safe and open areas where dogs can run and

play off leash in the City. Being able to run and play off leash is essential to a dogs well being.

Over the years I have observed that most dog owners are responsible, maintain control of their dogs and clean up after them. Thus I believe the current arrangement works fairly well, and I prefer alternative A of the Draft Environmental Impact Statement. However I understand the desire for a better defined policy and greater restrictions and thus alternative E is my second choice. Given how muddy the Crissy Field air field is in the winter and how many burs and foxtails it has in the spring, a beach off leash option is important for dogs and central beach makes the most sense since east beach and the promenade are used by most other park visitors.

Sincerely, Laura Blake

Correspondence ID: 2800 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Letter
Correspondence: By First Class Mail Mr. Frank Dean Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, California 94123-0022

Re: Dog Management Plan and Draft Environmental Impact Statement comments

Dear Mr. Dean:

I urge you to make no further restrictions on off-leash dog walking in the Golden Gate National Recreation Area. The opportunity to walk dogs off-leash provides a unique recreational opportunity for Bay Area residents such as me to exercise not only our dogs but also ourselves. In the process, we are able to meet and interact with diverse people from the community with whom we would not otherwise interact in our daily lives, such as at work or in our own neighborhoods.

Sincerely,

Robert J. Durham, Jr.

Correspondence ID: 2801 **Project:** 11759 **Document:** 38106
Received: May,05,2011 11:43:21
Correspondence Type: Web Form
Correspondence: Dear National Park Service Administration, I am a Marin City homeowner

who lives just one block from the Pacheco fire road that connects to the Alta Trail and the GGNRA. I oppose the draft plan submitted by the Park Service that will change dog access to this trail and the the Oakwood Valley/Tennessee Valley areas. I am a former NPS employee and a current Sierra Club member. I have two border collies that I take up on Alta Trail nearly every day, under my strict voice control. In my experience, the dog owners and walkers who use the trail are very responsible and respectful of both the environment and the wildlife in this habitat. The erosion on Alta Trail is not due to dogs, or any animals for that matter, but hard rains combined with vehicular and bike traffic . The draft map makes a hodgepodge of local trails- Oakwood Valley is off leash and fenced, while Alta is not. This makes no sense at all. I believe that Alta Trail should remain off leash as it stands now on existing maps. Furthermore, the Park Service is incorrectly marking the stretch of trail from the Donahue parking lot to the GGNRA border as federal property. This is private property with a county and NPS easement- NPS will not be able to enforce any dog code on this stretch, and the draft maps should be corrected accordingly to show the proper boundaries. The proposed fence along Oakwood Valley will limit access of native wildlife to their main water source- the creek that runs the length of the valley (and trail). The EFFECTS OF PROPOSED FENCING WILL BE FAR MORE DAMAGING TO WILDFIRE THAN DOG USE. I cannot believe that this made it into a draft proposal that should have contained an EIA that looked at this potential impact, as well as the parallel impacts of mountain bikers and hikers on this same area.

To restate, I am opposed to the NPS draft plan, and would like dog access to remain unchanged from the current conditions.

Sincerely,

Laura Godwin

Correspondence ID: 2802 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Letter
Correspondence: Sir:

Dogs at Crissy Field are a health and safety hazard as well as a threat to wildlife. They foul the sand and grass where children play, and run-off goes into the bay. Joggers get tripped as I once was, injuring my shoulder. I've stopped jogging there and long ago stopped bringing my granddaughter.

Som cities have dog parks (e.g., Laguna Beach) where dogs may freely run and relieve themselves. Not great for groundwater but still a better

alternative.

Thank you for your attention to this matter.

Sincerely,

Rocco R. Fazio

Correspondence ID: 2803 **Project:** 11759 **Document:** 38106
Received: May,05,2011 12:34:31
Correspondence Type: Web Form
Correspondence: Dear Park Service,

I have put off writing for way too long, trying to organize cohesively my thoughts. Good thing the final deadline is approaching so I can be counted, so to speak. I am a 66 year old woman with 3 Westies whom I am afraid to walk in any of GGNRA areas because of out-of-control off-leash dogs. Two of my dogs have Obedience titles but still do not take kindly to a (usually) big dog running toward them. They feel threatened and so do I. I do not want to fall down and I definitely do not want them injured.

I can only imagine how the tiny birds might feel in this situation; they do not deserve to be harrassed, they are owed a calm and peaceful home.

I do not believe these dogs and their owners, or the dog walkers (and that is another whole topic that gets my Irish up) have any rights to run free in this special, lovely area that is the GGNRA.

Thank you for your time.

Correspondence ID: 2804 **Project:** 11759 **Document:** 38106
Received: May,05,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Keep all parks as close to nature as possible!

Correspondence ID: 2805 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Letter
Correspondence: I wish to submit my comments regarding the GGNRA's draft dog management plan.

As a native San Franciscan and a resident of the Western part of the City, I

voted in the 1970's to deed some of our precious open spaces to the Federal Government with the hope that the lands would be protected from development. My goal was to ensure that these recreation areas would remain wild and free and available to San Francisco's residents and our neighboring communities for recreational use. At no time did I imagine that the Federal government's plan would evolve into one that would deny the citizens the freedoms they enjoyed when the City managed the land.

I am a single, middle-aged and physically disabled woman who walks at Fort Funston every morning before I go to work and several times each weekend. I feel safe walking there because of the presence of my own dog and the other dogs and their people. The dog management proposal suggests that many disabled people feel vulnerable around dogs. I do not; I feel protected. I believe that if someone disabled did feel at jeopardy in the presence of dogs, s/he should go to one of the many places in and around San Francisco where dog access is already limited rather than seeking to change the use of a recreation area to accommodate their fears.

Never have I seen at Fort Funston some of the intimidating people who frequent Golden Gate Park in the early morning and I believe that is a function of the area being frequented by the "dog community". My footsteps and those of the rest of the Fort Funston regulars are not creating the erosion that makes the cliffs topple; the forces of nature take care of that. I have never seen anyone there act irresponsibly about honoring the environment. Indeed; I've seen many people come up from the beach carrying bags of debris that they had voluntarily collected while they were down walking their dogs. I've also witnessed "dog people" making calls on the behalf of injured marine mammals and birds stranded on the beach.

Fort Funston serves as a great example of San Francisco values; everyone there coexists beautifully. Every age and race is represented. People far more disabled than I travel along on their scooters alongside their family members, human and canine alike.

My first degree was in Marine Biology and I am a strong supporter of environmental protection efforts. However; your agenda of moving toward the creation of some sort of Biosphere at the edge of a major metropolitan area is misguided. Those of us who live in urban centers, where stress and anxiety run high, value our connection to nature. Its impact on mental and physical health is crucial.

I am focusing on Fort Funston because that's the area I use most. But my concerns also apply to the extreme restrictions proposed for all the lands entrusted to the GGNRA. I am appalled that my tax dollars are funding an effort that attacks my fundamental rights to freedom and the pursuit of happiness. This effort to strip us of access to our own "backyard" is an

example of gross mismanagement. All stakeholders must be involved in decisions regarding the use of these well- loved areas. If the Federal government is incapable of that, I'd vote that the control be returned to the local governments. So Very Sincerely, Lauris Jensen San Francisco, CA 94116

Correspondence ID: 2806 **Project:** 11759 **Document:** 38106
Received: May,05,2011 13:28:55
Correspondence Type: Web Form
Correspondence: Dog owners keep on citing the pet policy of 1979, a time when there were less people, less dogs and thus less conflicts. Times have changed and so must policies. It does not work to have off leash dogs in a dense urban setting and I feel that off leash recreation should be limited to private property. Meaning that the GGNRA should not allow any off leash dog areas. Many people including myself avoid areas with dogs but would enjoy them if there were no dogs.

Correspondence ID: 2807 **Project:** 11759 **Document:** 38106
Received: Mar,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Memorandum To: General Superintendent, National Park Service. Golden Gate National Recreation Area, Fort Mason San. Francisco, California

From: Assistant Field Supervisor. Sacramento Fish and Wildlife Office, Sacramento, California

Subject: Comments on the Draft Dog Management Plan and Environmental Impact Statement, Golden Gate National Recreation Area, California

The U.S. Fish and Wildlife Service's (Service), Sacramento Fish and Wildlife Office, is providing comments on the Draft Dog Management Plan / Environmental Impact Statement (Draft Plan/EIS) for Golden Gate National Recreation Area (GGNRA) under the authority of the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.) (Act). At issue are the potential effects of the project on the federally threatened California red-legged frog (*Rana draytonii*), western snowy plover (*Charadrius alexandrinus nivosus*), northern spotted owl (*Strix occidentalis caurina*), and Marin dwarf-flax (*Hesperolinon congestum*); as well as the federally endangered San Bruno elfin butterfly (*Callophrys mossii hayensis*), mission blue butterfly (*Icaricia icarioides missionensis*), tidewater goby (*Eucyclogobius newherryi*), San Francisco garter snake (*Thamnophis sirtalis tetractenia*), Presidio manzanita (*Arctostaphylos hookeri ravenii*), San

Francisco lessingia (*lessingia germanorum*), California seablite (*Suaeda californica*), and Hickman's potentilla (*Potentilla hickmanii*).

This letter is based on: (1) A letter dated December 28, 2010 from the GGNRA to the Service requesting comments on their Draft Plan/EIS; (2) Draft Dog Management Plan / Environmental Impact Statement; and, (3) other information available to the Service.

The purpose of the Draft Plan/EIS is "to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park". Objectives of the Dog Management Plan are: to preserve and protect natural and cultural resources and natural processes; provide a variety of visitor experiences; improve visitor and employee safety; reduce user conflicts; and to maintain park resources and values for future generations. The Draft Plan/EIS addresses dog management alternatives for 21 locations within GGNRA. One of the 21 locations is "new lands-. New lands are defined as "any land acquired by the park during the dog management planning process or after the plan/EIS and rule are finalized, unless specifically addressed by the plan." The 21 locations are within Marin, San Francisco and San Mateo Counties. The Draft Plan/EIS proposes 6 alternatives, with one being preferred and one being no-action, for each of the 21 locations. Each of the 21 locations within the Draft Plan/EIS was assigned a preferred alternative using a "modified Choosing by Advantages process". As part of their analysis, GGNRA identified the environmentally preferable alternative for all 21 sites. This alternative was identified as the one which would "cause the least damage to the biological and physical environment" and best promote the National Environmental Policy Act. The environmentally preferable alternative corresponded with the National Park Service preferred alternative at only 4 of the 21 locations. While not meeting the criteria for being the environmentally preferable alternative, the preferable alternative chosen for the other 17 locations adequately addresses the Service's concerns for threatened and endangered species and critical habitat.

The Service believes that the Draft Plan/EIS, as proposed, meets the goals and objectives of the project and adequately addresses federally threatened and endangered species and habitat within the project area so as to not jeopardize listed species or destroy or adversely modify critical habitat. In contrast to the current "dog policy" within GGNRA, the Draft Plan/EIS appears to promote a beneficial effect to listed species and critical habitat. The adoption of a compliance- based management strategy is viewed as an important component of the Draft Plan/EIS and instills confidence that GGNRA will continue to manage their lands with an emphasis on managing sensitive resources responsibly. Additionally, the proposed measures for increasing public awareness through education and standardized management is viewed as a key factor in the successful implementation of

this Draft Plan/EIS

The Service would like to thank GGNRA for the opportunity to comment on this Draft Plan/EIS Please contact Dan Cordova, Endangered Species Biologist, or Ryan Olah, Coast Bay Branch Chief, at the letter head address, via electronic mail (Dan_Cordova@fws.gov; Ryan Olah@fws.gov), or at telephone (916) 414-6600 if you have any questions.

Correspondence ID: 2808 **Project:** 11759 **Document:** 38106
Received: Mar,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Bldg. 201 San Francisco, CA 94123-0022 Attn: Dog Management Plan/DEIS March 21, 2011

Dear Mr. Dean,

I am strongly in favor of keeping the GGNRA open to dogs and off-leash dog walking. I implore the GGNRA to stop pushing its extreme proposal that will negatively impact tens of thousands of tax-paying and voting residents living in San Francisco and Marin. I understand that Congress could resolve this conflict by codifying the GGNRA's 1979 Pet Policy as a Section Seven Special Regulation, and mandating that all properties added to the GGNRA after 1979 maintain historical recreational access. Please do NOT eliminate or restrict dogs or off-leash dog walking in San Francisco or Marin.

I lived on Chestnut Street in the Marina in San Francisco for 9 years and recently moved to Mill Valley in Marin County. I am the owner of two 13-year old, female Vizslas. I walk my dogs three times a day and send them out with a dog walker once a day while I am at work. Every day after work I take my dogs to Chrissy Field or the Oakwood Valley trail for a 30 minute off leash walk. On Saturday and Sunday I walk them at Chrissy Field in the morning and in the Presidio or the Oakwood Valley Trail in Marin in the afternoon.

I am from the East Coast and have lived in the Bay area for over 11 years. I consider myself fortunate to live in such a beautiful and historical city. Three of the areas I treasure are Chrissy Field, the Oakwood Valley Trail and the Presidio. There are few cities anywhere in the world where one can walk with their dog in a National Park or along a beach. Chrissy Field and the Presidio are two special places in that they are bursting with natural, beauty and yet are also grounded in rich history. The same holds true for the

Oakwood Valley trail, Baker Beach and Fort Funston.

Chrissy Field, the Oakwood Valley Trail, Fort Funston and the Presidio are perfect places to walk dogs off leash. At Chrissy Field the dogs can run on the beach and romp in the field. Few other places provide such diverse terrain and excellent play areas. The Oakwood Valley Trail is also an excellent place for dogs to walk off-leash as there are few people, no cars and ample trails. Other excellent off-leash dog walking areas are the Marin Headlands, Fort Funston and Baker Beach.

As I am sure you are aware, it is very important for a dog's mental and physical health that they get plenty of exercise. Some dog breeds require more exercise than others and it would be difficult for those breeds, such as the Vizsla, to get the proper exercise they require if they can not run and play off leash. My dogs are very high energy and need to exercise at least two hours a day. Exercise and socializing is critical to a dog's health and well-being. I make taking my dogs out for exercise my number one priority.

I am strongly in favor of allowing dogs off-leash in as many GGNRA areas as possible. The more places that one can walk their dog(s) off-leash, the better. I hope you will consider the impact on San Francisco if off leash dog walking is restricted or banned in the GGNRA. Banning or further limiting off leash dogs will have a significant negative impact on San Francisco and Marin county parks. At least 10,000 dogs visit the GGNRA every day. San Francisco city parks are much, much smaller than the GGNRA and will be unable to absorb the impact of all those dogs if they are forced out of the GGNRA. The negative impact on city parks far outweighs any potential negative impacts in the GGNRA.

Given that I walk my dogs several times a day, I am able to get out and meet many local friends and neighbors as well as tourists on my daily walks. Given my passion for the city and Marin, one of the things I am able to do is share stories and history with people who are visiting from out of town. One of the things that makes it easy for them to approach me is my dogs as they form a common bond between people. Every day I am out with my dogs I meet and socialize with people young and old; people gay and straight, people from the city and those visiting.

One of the nice things about Chrissy Field, The Oakwood Valley Trail and the Presidio is that they are multi-use areas. So on any given day one is apt to encounter joggers, walkers, cyclists, people flying kites, windsurfers, people picnicking, etc. One of the charms of the area is that they attract and support such a diverse group of people and wide range of activities. The community of people recreating with off leash dogs represents a tremendous cultural resource in San Francisco and the GGNRA. Where else can you see people from nearly every ethnic background and race, all socio-economic

levels, seniors, families with kids, etc. all getting together every day and every week to socialize together while their dogs play off leash. Walking and playing with off leash dogs brings together people who otherwise would rarely see or interact with one another.

Whenever I am out in Marin on the Oakwood Valley Trail or in San Francisco in the Presidio or Chrissy Field, safety is of utmost importance to me. I believe that banning or further limiting off leash dogs will have a negative impact on park safety. A well- used park is a safe park. Seniors and women, in particular, are often reluctant to walk alone in parks because of fears of muggings or rapes. The presence of people with well-behaved dogs off leash discourages rapists, muggers, homeless people and drug dealers from hanging out in parks. Many people, especially women like myself and elder folks, walk in the GGNRA precisely because there are so many people with off leash dogs there. The dogs provide a valuable sense of safety and security.

San Francisco and Marin residents have been walking dogs off leash in the GGNRA for decades and this is yet another valid consideration for maintaining off leash areas. Off leash dog walking is the status quo. Banning or further limiting where off leash dogs are allowed constitutes a change to the current and historical use of the park. Continuing to allow significant off leash recreation opportunities constitutes a "continuity of use" of park land. I implore you to maintain continuity of use. I am strongly in favor of allowing dogs off-leash in as many GGNRA areas as possible. The more places that one can walk their dog(s) off-leash, the better.

Please do NOT eliminate or restrict dogs of off-leash dog walking in San Francisco or Marin.

Thank you for your time.

Sincerely, Emily Church

Correspondence ID: 2809 **Project:** 11759 **Document:** 38106
Received: Mar,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Diane Kraft Ward San Francisco, CA 94115

March 24, 2011

Frank Dean General Superintendent Golden Gate National Recreation Area
Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean:

When work first began to reclaim and recover Crissy Field, there were park rangers stationed at the path leading off from the parking lot. They were giving out dog biscuits and assurances that nothing would change in the way dogs would be treated after the renovation. However, after reading your GGNRA Draft Dog Management Plan, those assurances could not be further from the truth.

I am very opposed to the GGNRA adopting management plans that are intended to maintain uniformity among the diverse national parks operated by the National Park Service. The Crissy Field area is an urban park that bears no resemblance to Yellowstone, Yosemite or Death Valley. Nor does Crissy Field serve the same populations as other discrete (and relatively isolated) national park areas.

In a City in which one out of eight residents has a dog, it is short-sighted and cruel to limit the areas where dogs are allowed, either on or off leash. Where do you expect people to recreate with their dogs in a city as compact and densely populated as San Francisco if not in its limited open areas, which includes its beaches?

The San Francisco Supervisors, among others, consented to and supported the creation of the GGNRA with the understanding that the areas it ceded to the federal government would be primarily used for the recreational needs of City residents. Now, you propose to limit significantly the recreational options of those same residents, many of whom own dogs, forcing them to travel outside the city and county if they want to give their pets the daily exercise they require.

While San Francisco has always welcomed tourists from around the world, we (and that includes the GGNRA) need to make sure we give the citizens of San Francisco reasonable use of the limited park assets available to them. At both Crissy Field and Fort Funston, there have been understandings in place for the past twenty years giving dogs off-leash access. If there are so many people using these areas that you worry about accommodating them all, may I suggest that you grant dog owners off-leash access to beach and bluff areas in the early morning hours, perhaps from 5 am. to 10 am., when few other people are around, and again in the late afternoon and early evening, from 4:30 p.m. to 8:00 p.m., another time period when clashes between different user groups would not be expected.

The foregoing alternatives to what amounts to an outright ban on off-leash access for dogs in the GGNRA are just one possible way of making sure that all people have equal access to their national parks.

Sincerely,

Diane Kraft Ward

Correspondence ID: 2810 **Project:** 11759 **Document:** 38106
Received: Mar,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 23, 2011

Mr. Frank Dean General Superintendent, Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022.

RE: Dog Management GGNRA

Dear Mr. Dean:

I have read the Executive Summary of the proposed new plan and am sorry to say that I feel the purpose of the study has been totally missed. Instead of looking for ways to include dog people in the safe and sustainable use of GGNRA, you have chosen, through this draft report, to do nothing substantive to protect our natural and cultural resources but instead, recommend a decreased opportunity for visitor experiences for a major portion of the population that currently utilizes the GGNRA; and it most certainly WILL NOT reduce user conflicts, in fact, I am sure it will increase them. Finally, I see nothing in the new plan that insures park resources and values for future generations that has anything much to do with dogs and the urban, multi use park and recreation activity that have been going on in most of the referenced dog sites for the past 40 years (I moved here from LA in 1966 for school so I have been around).

Where in the report are people and their dogs invited to more fully use the parks? Which sections have you intentionally made dog friendly to encourage more people to come to certain park areas? Where are you installing more poop bag containers and developing special play areas for dogs and people. The opportunities are limitless and what do we get?, more restrictions and an escalated war on dogs. You treat us like interlopers and criminals rather than the cultural mix of citizens who happen to like dogs. Honestly, the lack of any kind of creative thought in dealing with this difficult issue is astounding. All that can be said is go back to the drawing board and invite and welcome dog people into GGNRA (including off-leash) in a way that truly values the urban park resource in a way that will last for generations. Please keep in mind that these are urban parks, surrounded by millions of people, not wilderness (where you can apparently shoot anything

that moves outside of the Bay Area).

Let me know if we can help. Sincerely, Stephen S. Martin Douglas W.
Schmidt San Francisco, CA 94114

Stinson Beach CA 94970

Congresswoman Nancy Pelosi Senator Diane Feinstein John U Jarvis,
National Park Service Christine Lehnertz, National Park Service Scott
Weiner SF Supervisor District R Step Kinsey, Marin Co Supervisor District
4

Correspondence ID: 2811 **Project:** 11759 **Document:** 38106
Received: Apr,06,2011 00:00:00
Correspondence Type: Letter
Correspondence: April 4, 2011 Ms. Susan Langbehn Ott Daly City, CA 94015

Senator Dianne Feinstein One Post Street, Ste. 2450 San Francisco, CA
94104

Senator Feinstein:

The purpose of this letter is to express my grave concerns regarding the proposed plan by the Golden Gate National Recreation Area (GGNRA) to severely restrict off-leash dog walking. Currently GGNRA allows for less than 1% of its land to be used for off-leash dog recreation. They now want to greatly limit that tiny fraction and also ban off-leash dog recreation for all future GGNRA lands. The Bay Area needs your help to stop this extreme proposal, which has been given no public vote.

One of my concerns lies in the fact that I am physically challenged with arthritis, and need a paved path to walk with a surrounding area which also allows my dog to run ' such as Fort Funston. I cannot make it down to the beach, which is one of the two small areas that the GGNRA is proposing to leave open to off-leash dog walking within Funston. The proposed restrictions will not only affect handicapped people, but senior citizens and families with strollers. Their proposal is just not fair or sustainable.

The legislation that initially created GGNRA allowed for the "maintenance of needed recreational open space", specifically including off-leash dog walking. This has been favorable to property values in that the Bay Area is known for a dog-friendly atmosphere which attracts Homeowners like me as well as renters, because we are assured ample space to exercise our dogs. I am a fourth generation San Franciscan and my family has always had dogs,

enjoying areas that the GGNRA now has under attack throughout SF, Marin and San Mateo counties. I can't imagine how crowded the remaining open dog areas will be if this bogus plan is allowed to go into effect. This fact was proven out during the recent tsunami warning when Ocean Beach and Funston were closed ' areas in SF such as Stern Grove that typically have 20 dogs had almost 200. That will be the norm if the GGNRA is allowed to proceed.

I understand the need to raise maintenance funds for the GGNRA and am not opposed to paying annual permit fees for dog usage as well as parking fees. I agree with GGNRA's proposal requiring professional dog walkers to have permits and capping the number of dogs they can walk at one time. All of the local dog groups are willing to work with the GGNRA to protect environmental areas. But instead of working with the community the GGNRA wants to push through their plan to our detriment. Fort Funston and other sites within GGNRA are places where the community comes together old and young, gay and straight, singles and families, rich and poor of all ethnicities - united in their common love for dogs. Congress can help resolve this conflict by codifying the GGNRA's 1979 Pet Policy as a Section 7 Special Regulation, mandating all property added to GGNRA after 1979 maintain historical recreational access.

The GGNRA Dog Plan can be viewed at tinyurl.com/GGNRAplan. The deadline for comments has been extended to 05/29/11, but time is of the essence. It is my understanding that the SF Board of Supervisors plans to discuss this critical topic during their meeting on 4/11/11.

Please help to stop this extreme plan. I am copying your fellow CA law makers in the hopes you can work together to bring some fairness to this process. Thank you in advance for your consideration in helping to maintain this important quality of life for the people of the Bay Area.

Sincerely, Susan Langbehn Ott

cc: U.S. Minority Leader Nancy Pelosi, 90 ' 7th St., Ste. 2-800, SF, CA 94103 U.S. Representative Jackie Speier, 400 So. El Camino Real, Ste. 750, San Mateo, CA 94402 Senator Barbara Boxer, 1700 Montgomery St., Ste. 240, SF, CA 94111 San Francisco Board of Supervisors Say,-cancisco Chronicle Frank Dean, General Superintendent, GGNRA, Building 201, Fort Mason, SF, CA 94123

Correspondence ID: 2812 **Project:** 11759 **Document:** 38106
Received: Apr,07,2011 00:00:00
Correspondence Type: Letter

Correspondence: March 17, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201 Fort Mason San Francisco, CA 94123-0022

Dear Superintendent Dean:

I am a parent, writing to tell you how important it is to both my family and me to preserve off-leash dog walking in its current form at Ft. Funston. In fact, with friends who drive up to Funston from towns as far away as Palo Alto and Portola Valley for their dogs to play, one of the best things the GGNRA can do to protect Funston's environment is to open space for off-leash recreation in San Mateo county.

Funston represents more than just dog exercise to us. It is family recreation. My kids love their computers, my husband his TV. But, early every weekend morning-8 to 10 times monthly my husband and I go hike around Funston with our athletic Australian Shepherd. These mornings have become the only peaceful time we have to touch base on the status of our family, to plan for the upcoming week, to think about the direction we must take for the health and well being of our children. Without our dog's need for exercise and the beauty of Funston to do it, I would sleep in.

On many weekends, say three monthly, we make a second trip with our kids and with friends. I believe I can accurately say that Funston is the only place where our entire household routinely has fun. We all love going out there and our beloved dog is the center of that. We play with her. We play with each other. We love the beauty of the beach, the dunes, and the trails. And we love being with each other there.

I understand that having so many dogs there creates a special kind of work for the park service. Our family is willing to help offset that in many ways: ? We would happily purchase a special off-leash license to allow our dog to run free in the park. This would help offset the costs of having dogs like her there.

? We would eagerly go through an authorized training program'say, with the SPCA'in appropriate manners in dealing with humans, other dogs, and even horses. And successful completion of this program (with appropriate tests) could be a requirement for the off-leash license. Our family is lucky enough to have sufficient free income to donate to charities. Were there a charitable fund to help offset costs for off-leash dogs at the GGNRA, we would happily make annual contributions to it.

? We have already participated in Funston clean-up days and expect to continue doing so. And we pick up on our own. We love the park, its beauty, and all it gives us. We want to help preserve it.

Unfortunately, we do not see the preferred option for Funston as way to help preserve all it gives us. With such a smaller space available to off-leash dogs, I feel that the consequent crowding ' were all of the current loyal vistors to squeeze into that space ' would chase us and many others away from using GGRNRA lands.

I'm sorry to say this, but I Have to wonder if that is the real objective of these proposals. By the Park Service's own statistics, dogs create a small disruption in operations. In all of 2007 and 2008, only 59 citations were issued for dog related incidents in Funston. That's a small percentage of dogs visiting the park in a single weekend, forget about two years. With dogs createing few seri,ous problems, I have to wonder if the the Park Service really wants fewer people there. For it is the people who trample and compact and create many of the environmental concerns in the report.

I wish that the Park Service appreciated the success that Funston represents. Many happy visitors, sharing the beauty, community, and exercise at the park. People so committed to the park that they clean up after others in an organized way every month and ad hoc every day. Funston is a wonderfully successful urban park, bringing great joy to many city residents.

I urge you to preserve that joy and community. I support. option A in your report. Please reconsider your preference and join me.

Thank you for your listening to me.

Best wishes,

Laurie Frankel

Correspondence ID: 2813 **Project:** 11759 **Document:** 38106
Received: Mar,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 30, 2011

Sally Cancelmo San Francisco CA 94115

Frank Dean General Superintendent GGNRA Fort Mason, Bldg 201 San Francisco CA 94123

RE: Dog Management Plan

Dear Superintendent Dean,

I am a San Francisco resident who has been walking dogs in the GGNRA for 21 years primarily at Crissy Field and Baker Beach. I believe that the Preferred Alternatives cited in the DEIS are too restrictive, will result by design in an overflow into restricted areas and will not accomplish the goal of providing both protection of resources and recreation for all user groups.

Crowding will create problems The Preferred Alternative at Crissy Field, by eliminating dogs from the East Beach particularly during weekday hours, and the airfield also largely empty during the week, will force greater interaction between a greater number of dogs and their owners (especially during high tides) in a much smaller area. One reason that there are relatively few problems with dog aggression is that there is enough space at Crissy for everyone to interact when they wish to and not because density has been forced on them. Solution: Make the East Beach and parts of the Airfield off limits between 10 to 4 on weekends. Allow full use during the week.

The Preferred Alternative does not address needs of two user groups: seniors and families with children and dogs. Elderly people with dogs, and families with both children and dogs do not have a viable alternative in this plan. The distance to the Central Beach makes it difficult for frail seniors and impossible for families with kids and dogs to manage to move themselves and their gear (strollers, beach stuff) from the parking lot over the bridge to the beach. Solution: same as above: full weekday use and timed use on the weekends. Rotting Fences Allow Dogs to Enter Restricted Areas (see pp 569- 573) It is unfair to accuse dogs of entering the dune areas at Crissy Field when the existing fences are rusted, broken or down in many areas. The original design at Crissy Field of fencing at the dunes and double fencing on the path does work when they are properly maintained. The post and cable fence at the beginning of the Wildlife Protection area is a true success. The majority of owners and their dogs honor the fence line. Solution: Don't blame the dogs for park maintenance failures.

Why forbid dogs on the West Beach when the Snowy Plovers are not there for almost half the year! Last year the six Snowy Plovers on the West Beach departed in March and did not return until November. I am perfectly happy, as are most dog owners, to protect the birds WHEN THEY ARE THERE. I look forward to their return each winter. The post and cable fence at the beginning of the Wildlife Protection area is a true success. Ticket the dogs and their owners and other users who plant themselves in the middle of the plover area.

Solution: Ticket the dogs and their owners and other users and school groups who plant themselves in the middle of the plover area each winter. Provide volunteers on the weekends who can explain about the plovers to uneducated users. The only volunteer I ever see on the West Beach is there

during the week when the beach is walked on-leash by regulars who know and honor the WPA.

Prohibit dogs on the West Beach when the Snowy Plovers are actually there, then allow dogs the rest of the time. This beach is completely underused during the plover off-season and would provide an outlet for the overcrowding on the Central Beach. Also, at the Wildlife Protection area another sign should be placed on the last post before the Bay so that everyone can be alerted to the restrictions at low tide.

Do Not Move Post and Cable Fence East Show me the justification, scientific or otherwise, that the existing and successful fencing needs to be moved again! The plovers rest a third of a beach away from this fencing. Why increase crowding on an already overcrowded beach (by your design) by altering the size of the WPA.

Solution: Leave the post and cable fence where it is. Ticket the scofflaws.

No Dogs on Baker Beach is inconsistent with traditional use and there are no dune resources west of Lobos Creek The western end of Baker Beach has been an off leash area since the 1979 Pet Policy. There are no dunes or vegetation here. Very few picnickers use this end of the beach so there are no problems with conflict west of Lobos Creek. This beach is empty empty during the week. Solution: Allow off leash west of Lobos Creek on weekdays; perhaps timed use on weekends.

The Poison Pill is an end around the Public Process

I am appalled at this provision. Is it legal? It certainly isn't transparent. The GGNRA has been woefully inadequate through the years in providing education, materials and proper signage to users about rules, etiquette, etc.

How is this 75% to be measured and by whom? A ranger told me that it will be assessed not by number of citations, but by "observation". Forgive, me but this seems to be a sneaky, and not very transparent way of undercutting the process and eliminating off-leash. Without stipulating how this measurement is to be taken, there will be no trust in the numbers and an justified outcry, if off-leash is rescinded.

Solution: Don't rule by poison pill. Put rangers on the ground to educate the public, particularly on weekends. Provide good signage. Work with the public instead of threatening them.

I know that a management plan is necessary. I would like to see one that honors the longstanding off-leash recreational use of our coast and beaches as mandated in the turnover of this land to the GGNRA. If the plan is to

succeed, without the need for a poison pill and constant surveillance, it must be fair and provide adequate space for dog owners. Thank you for your attention to my response. Sincerely,

Sally Cancelmo

Correspondence ID: 2814 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Letter
Correspondence: March 25, 2011 Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201 Fort Mason San Francisco, CA 94123-0022

Dear Mr. Dean,

I urge you to reconsider the current proposal to significantly limit dog walking areas in the Golden Gate National Recreation Area within San Francisco, particularly within Fort Funston.

I have worked downtown, in San Francisco's Financial District, for over thirty years. In all that time I have merely walked past the other pedestrians on the street. There is no reason to speak to them, no common interest to bring us together. In contrast, one of the wonderful things about Fort Funston is the feeling of community that exists. Everyone can enjoy the presence of the great number of dogs enjoying the ability to walk freely. Everyone has a reason to reach out other to other folks enjoying the park with a welcome and shared conversation; made possible by the common interest in and enjoyment of dogs.

In its current structure Fort Funston loosens the constraints of loneliness for many and, thus, Fort Funston improves the quality of life for dog owners and non dog owners alike. The new structure with its greatly reduced on and off leash dog walking areas would separate us yet again and thus weaken the quality of life for San Franciscans and others who visit this area.

Please reconsider and keep Fort Funston available as an off leash walking area in its current formation.

Sincerely, Lorraine R. Fleming San Francisco, CA 94134-1805

Correspondence ID: 2815 **Project:** 11759 **Document:** 38106
Received: Apr,05,2011 00:00:00
Correspondence Type: Letter

Type:

Correspondence: Dear Superintendent Dean,

My husband, Jerome Solari and I have resided in the Cow Hollow district for over fifty years. Our sons used the Marina Greens for various practices from St. Vincent De Paul School. My husband and I skated at the Greens on a daily basis until Crissy Field was redeveloped. At that time we skated to Fort Point and then walk our dog afterwards.

Due to a serious accident I can no longer skate or engage in strenuous activities and therefore the ambiance of Crissy Field has become even more important to our family. Our sons often bring our grandchildren to enjoy the space.

We walk our new dog, Chispa, there on a daily basis and enjoy watching her interact with friends, strangers and other dogs. We are members of the Crissy Field Dog Group and applaud the fact that a great deal of money is expended to provide plastic bags for users, as well as volunteers who daily provide additional bags.

In addition I have been a long time member of a local hiking group, we have supported the SPCA for more than 20 years, and are members of the Cow Hollow Home Owners Group. We also belong to the PRBO organization, and the Marine Mammal Center.

Over this period of years we have gained friends who also use a concerted effort to maintain a pristine beach. We all call attention to dog "poops" if someone else doesn't see or care to pick them up. Many of us do pick up and at the same time pick up harmful trash dropped by humans who use the beach plus objects which come ashore and are harmful to wild life. We see many people doing this on a daily basis even though we realize that there are thoughtless owners.

Dogs do not leave wrappers, bottles, oil cans, kites, but humans who share this space do!

We do feel that dogs are no longer bothering the restricted area where the Snowy Plover may come to rest. However, because the original signs were not placed correctly and inadequate from all directions it took two years before the area was properly delineated.

The recent distraction there was by humans flying kites. It truly is not always the dog or dog owner!

Perhaps an alternative way to command attention might be to have larger signs just before crossing the bridge near the Bag container. We know it is a

large job for park staff to clean up and we understand that staff is stretched at this time with limited budget. Perhaps this would remind the guilty. We are concerned that we are placed into the "bad dog owners" category and find no alternative to support our efforts and care.

We have never seen the horse droppings cleaned up when equestrian rangers appear.

It is vital that consideration be given to the amount and damaging use of all the many organizations using the area at Crissy. When the 3 day cancer walk event happens the tents are pitched on the grass for two nights which is hard on the grass area and expensive to restore. We dog owners would be asked to share that same space with our dogs leaving the rest of the vast area untouched. How can the dogs and large groups share this space?

There are thousands of people who would be asked to use this cramped area!

It is possible that Community organizations could be used to educate all of those concerned in use of the GGNRA areas. The possibility of combining could add needed funding. Many of these organizations are in a position to advise and help, the SPCA is one we could suggest.

Because of constant attendance we find little evidence of incidences where natural resources are being affected. Bird life seems unimpaired. Dogs cannot catch birds in the water!

One of the objections in the study is the noise level created by dogs. We would point out that bull-horns at running events, shouting or rooting, sirens, bird's sounds, construction, exercise commands are far more disturbing than the dogs.

Dogs need to run, and the Island/peninsula effect of San Francisco limits dog owners. Leashing of dogs should be mandatory the animal is not under voice control of it's owner.

As the proposed areas of elimination at Crissy field appear it would be almost impossible for a handicapped person with family and dog to get onto the beach. This has not been thought through. At the meeting at Fort Mason on 7 March 2011, the first display was of new lands hoped to be included in the GGNRA. There is already in place a no dog restriction. Granted, that could be changed, but is it fair to establish this without any actual alternative?

We support Alternative A, but suggesting leashing be required in the parking area which would be advantageous for visitors, other users, safety of

children and dogs as well.

Thank you for your consideration, Nancy and Jerome Solari San Francisco, CA 94123

Correspondence ID: 2816 **Project:** 11759 **Document:** 38106
Received: May,05,2011 17:10:36
Correspondence Type: Web Form
Correspondence: As an environmentalist and a dog owner I find the new regulations on local parks to be over bearings. Living in San Francisco, often times in small apartments, makes it difficult to get proper exercise for our dogs. It is important that we be able to enjoy the great outdoors while sharing it with the pets in our lives. People will be less inclined to support outdoor areas if they are kept from enjoying it. As people become more disconnected from the world, it is important that love for the outdoors lives on.

Correspondence ID: 2817 **Project:** 11759 **Document:** 38106
Received: May,05,2011 17:36:09
Correspondence Type: Web Form
Correspondence: As a member of more than one protected class in San Francisco and service dog owner, I'm writing against the proposed GGNRA Draft Dog Management Plan. I've been walking my dogs in GGNRA's off-leash dog areas for over 10 years (mostly Ft. Funston and Chrissy Field's off-leash area) multiple times a week. The Preferred Alternative is overly restrictive. The science and data do not support the level of restrictions on people with dogs included in the Preferred Alternative. When dogs are walked in a responsible way (as most are), there is no conflict with the environment or with other park users. Target people not walking their dogs responsibly, but leave the vast majority of us alone. I have yet to see park rangers ticketing people who are not in voice control of their dogs. A ban on off-leash dogs punishes the vast majority of citizens whose dogs and service animals are within voice control, stay within posted areas and are great citizens. Many of us participate in regular clean ups at Ft. Funston and clean up on regular days we're using the parks. Please do not pass this plan.

Jennifer Burton Licensed owner of a service dog in the city of San Francisco San Francisco, CA 94110

Correspondence ID: 2818 **Project:** 11759 **Document:** 38106
Received: May,05,2011 21:12:34
Correspondence Type: Web Form

Type:

Correspondence: The GGNRA's "Dog Management Plan" that is proposed, and that is attempting to ban dogs from 90% of all parks, causes me to no longer want to be involved with your organization.

This issue is important to me as a dog "parent" in the SF Bay Area. I will not support/donate to an organization that bans dogs from 90% of the local parks/rec areas.

Therefore, I am canceling my membership to the Park's Conservancy and will NEVER donate a dime to them/you, again.

Correspondence ID: 2819 **Project:** 11759 **Document:** 38106

Received: May,05,2011 21:23:46

Correspondence Type: Web Form

Correspondence: Thank you to the National Park Service for working to implement a Dog Management Plan. Please go further with this plan by ensuring the protection of wildlife in the area. This can be done by ensuring that all off-leash areas are enclosed. Such areas should also be limited to areas without sensitive wildlife. The Park Service should also ensure that rules of the park, particularly those that protect wildlife and people are enforce. Alternative D is the best one, and should be adopted.

Thank you.

Correspondence ID: 2820 **Project:** 11759 **Document:** 38106

Received: May,06,2011 01:48:05

Correspondence Type: Web Form

Correspondence: It is part of responsible dog ownership to give one's dog adequate exercise every day. For dogs any bigger than pint size, this means they must be allowed to run off leash for part of that time. This is a simple need of the animals. Anything short of this is not humane. It must be our job to assure that there are places convenient to where people live where dogs can be exercised off leash. Dog parks are not the answer.

Just as parks and recreation authorities need to be sensitive to the needs of the dogs, so owners need to take responsibility for their dog's behavior. They must watch that their dog doesn't get into an altercation with another dog, clean up after it, leash it when near wildlife, and otherwise keep it on voice command when it is not on the leash.

All of this is common sense and should not require expensive studies.

Correspondence ID: 2821 **Project:** 11759 **Document:** 38106

Received: May,06,2011 03:04:41

Correspondence Type: Web Form

Correspondence: To whom it may concern:

As a former resident of San Francisco & regular visitor to the Golden Gate National Recreation area, I would like to respectfully urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Thank you for your consideration.

Sincerely, Ms. Juneko J. Robinson

Correspondence ID: 2822 **Project:** 11759 **Document:** 38106

Received: May,06,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Judith Anderson

Correspondence ID: 2823 **Project:** 11759 **Document:** 38106
Received: May,06,2011 00:00:00
Correspondence Type: Web Form
Correspondence: We should coexist and foster the protection of the other species that rely on this environment for survival!

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2824 **Project:** 11759 **Document:** 38106
Received: May,06,2011 12:04:27
Correspondence Type: Web Form
Correspondence: I urge you to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. San Francisco was the city of my mother's birth, my own birth, and the birth of my daughter. As I can no longer afford to live there, my visits to this area are precious. Every Sunday during the decades living there, I rode my bicycle through Golden Gate Park. This park is precious to me: please do all you can to protect it as a spot for wildlife as well as us humans!

Correspondence ID: 2825 **Project:** 11759 **Document:** 38106
Received: May,06,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2826 **Project:** 11759 **Document:** 38106

Received: May,06,2011 12:13:58

Correspondence Type: Web Form

Correspondence: Removing off-leash access from these is a horrible solution. I enjoy going to many of these places with my family (including my dog) because they are places we've come to know and enjoy spending time. Forcing people to keep their dogs on leash or not allowed at all takes away one's ability to even go to these locations to enjoy. There has got to be other alternatives like offering annual permits to allow responsible dog owners to take their dogs to these places UNLEASHED or restricted hours. Completely removing these as options and going for the ALL OR NONE approach is short sighted at best.

I am writing to say I whole heartedly disagree with the currently proposed changes. Keep these areas open to all to enjoy especially dogs who need to run free to stay healthy, social, and safe.

Correspondence ID: 2827 **Project:** 11759 **Document:** 38106

Received: May,06,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection

from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2828 **Project:** 11759 **Document:** 38106

Received: May,06,2011 14:34:20

Correspondence Type: Web Form

Correspondence: I am an environmentalist and a dog owner, and as someone who enjoys GGNRA on a daily basis, I think it is important to recognize the need to balance environmental protection with recreation in the park. Although GGNRA is a national park, it is also the main large park area for the whole city of San Francisco, which has quite a large number of dogs who need large, open, off leash areas. If I recall correctly, San Francisco has more dogs than children.

I disagree with attempts to require off leash dog areas to be fenced in. I think its unfeasible and really does not take into account the needs of dogs and dog owners in the Bay Area.

I also disagree with requiring dogs to be on leash at Ocean Beach, Crissy Field, Fort Funston, etc.

Yes, we should protect the GGNRA, but we also need to protect the ability of San Francisco dog owners to have ample open spaces to let our dogs exercise off leash.

Thanks for your consideration.

Correspondence ID: 2829 **Project:** 11759 **Document:** 38106

Received: May,06,2011 15:24:26

Correspondence Type: Web Form

Correspondence: DOGS ARE PETS AND DESERVE LOVE AND CARE BUT ALSO DISCIPLINE HARASSING WILDLIFE IS WRONG AND THE

OWNERS SHOULD BE HELD ACCOUNTABLE WITH FINES OR BANISHMENT.

Correspondence ID: 2830 **Project:** 11759 **Document:** 38106
Received: May,06,2011 15:37:14
Correspondence Type: Web Form
Correspondence: I am a frequent visitor to Chrissy field and I see no reason to change the existing dog walking rules. On most days 80% of the beach goers are walking/playing with their dogs and everyone has got along just fine with that for years. Why change something that is working so well?

Correspondence ID: 2831 **Project:** 11759 **Document:** 38106
Received: May,06,2011 16:51:32
Correspondence Type: Web Form
Correspondence: Mr. Frank Dean, We're writing to you about saving dog access and about maintaining the existing access rules in the GGNRA and hope that you can help us keep these areas open for that purpose. The GGNRA already has rules to govern dog use in their parks. All it needs to do is enforce the existing rules to manage this situation with just a few minor adjustments (e.g. setting maximum number of dogs for dog-walkers, addressing the paraglider/dog overlap at Fort Funston, etc.). The few "bad apples" that own dogs and don't obey the rules can be readily addressed without adding yet another raft of draconian restrictions. We oppose treating these urban recreation areas as if they were wilderness, as that is not what these areas are or were intended to be. You cite protection of the snowy plover, but humans infringe on their habitat and disturb these birds 1000x more than the few dogs on the few remaining beaches that even allow dogs. If protection of the bird is imperative, then human access to all beaches in California (including the GGNRA) should be eliminated. Of course that proposal isn't on the table for obvious reasons. We fully believe that these areas can and should be preserved for responsible recreation from all perspectives.

Lets call this plan exactly what it is; an assault on the few remaining urban recreation areas in the Bay Area by person(s)/organization(s) that frankly just don't want dog access period! Whether that be personal bias guised under the cover of "habitat protection" or whatever, the result is thinly veiled.

Please vote to keep these wonderful few remaining areas open to responsible dog owners. Vote to keep the existing dog use rules intact and enforce these rules to address the few bad apples. We are responsible dog owners who want to keep these areas available for dogs. There are so few areas that even

allow leashed or off-leash access that it is important that we preserve them. We regularly take our dog to Milagra Ridge, Sweeney Ridge, Mori Point and Fort Funston, so we are personally vested in this decision. We're also ardent environmentalists with the belief that responsible use can be accomplished without draconian restrictions. We appreciate you working with the local communities that want these treasures available for all to enjoy.

Correspondence ID: 2832 **Project:** 11759 **Document:** 38106

Received: May,06,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I know this is a tough decision..but I am sure that it is quite clear how hard wildlife has to work to stay alive. There are no Vons or Albertson's for species...they must work hard day and night to eat and then to procreate. I watch how Los Angeles does not protect its wildlife. Certainly all off leash areas must be separate from wildlife areas. Dogs must be enclosed because they are predators, and people who have dogs forget that 'Fifi' is a killer. Dogs are fed from Vons and from Albertsons.

Also, endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Please pay close attention to your wildlife and its protection.

Correspondence ID: 2833 **Project:** 11759 **Document:** 38106

Received: May,06,2011 00:00:00

Correspondence Type: Web Form

Correspondence: If the mission of the Golden Gate Recreation Area is to protect its' natural and cultural resources, then off-leash dog recreation should be properly enclosed. "This will protect endangered species and protect the integrity of the park itself. Thank you, Michael Eichenholtz

Correspondence ID: 2834 **Project:** 11759 **Document:** 38106

Received: May,06,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate national Recreation Area needs to follow its' mission: to

protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Please follow through on the commitment to protect these resources and animals - it is far more important to do so than it is to cater to the whims of random humans.

Thank you, Amy Pierre

Correspondence ID: 2835 **Project:** 11759 **Document:** 38106
Received: May,06,2011 18:31:44
Correspondence Type: Web Form
Correspondence: Dear Sir or Madam:

I and others value a place, especially near an urban area, where dogs are free to be dogs, and that there are less restrictive ways to achieve better control over the situation.

We only use less than 1% of GGNRA's park system and the charter supports our position.

Respectfully,

Jill Knapp and Samson

Correspondence ID: 2836 **Project:** 11759 **Document:** 38106
Received: May,06,2011 21:21:56
Correspondence Type: Web Form

Correspondence: I believe in year 2012 We will have drastic changes in our planet and already is happening. Animals are God's Divine Creation and God put his animals way before Adam and Eve. What is wrong with people that all they want is to destroy animals. How selfish people become and people are like cancer killing our nature, animals and our planet, building and building and taking animals habitat. Animals have all the right to live with us and We need to protect them. They are healers in our Planet. We will be so sorry!!!! when We don't heard birds singing, our squirrels and deers walking by our gardens, opossums and other wild life hanging in our backyards ext... Soon We will not have that anymore Why? because our planet is ill from too much sick, greedy and disgusting people. God had it! and it's time to clean up his planet earth again. We will have a world cataclysm and We will not have nothing, neither the richest men in the world will have nothing. people do not appreciate nothing anymore, everything is me, myself and I. If We have this cataclysm. This will be the biggest lesson ever. Wee need to protect our wildlife and mammals. If you see dogs unleashed, please call 911, Animal Humane so. or Animal Control. People has to be responsible with their dogs. Speak to the Mayor of this City and tell him to protect our wildlife, bring a law to this place. We need to protect what We have left. thank you.

Correspondence ID: 2837 **Project:** 11759 **Document:** 38106

Received: May,06,2011 22:49:05

Correspondence Type: Web Form

Correspondence: I am a biologist by training and profession, work and live in Marin and have been living in the Bay Area for nearly 20 years.

I am distressed by what I perceive as an increase in off-leash dog use in many of the open space areas of the SF Bay Area, and particularly in the GGNRA. It is rare that I am in an area clearly marked 'dogs must be on leash' where I don't see violations of this rule. I have recently witnessed dogs chasing shorebirds along the western shore of Rodeo Beach lagoon, and have repeatedly seen dogs running free on Ocean Beach south of the Plover signs. I am concerned the what I perceive as an attitude of promoting dog access rights over the safety of native wildlife.

I grew up with dogs, and have no problem with them personally, as long as they are kept close to their owners--on leash--in National Park lands. But my wish is that you prioritize the health and safety of the plants and wildlife you are entrusted with stewarding for us. If that also means closing areas to human traffic, then I am very happy to defer to your judgement.

Please put the health of our parks first, human access second and keep dogs on leash in most areas of the park. If I understand the plan correctly, I would

choose Option D in most areas under consideration.

Yours truly,

Mr. Kerry Wilcox

Correspondence ID: 2838 **Project:** 11759 **Document:** 38106
Received: May,06,2011 00:00:00
Correspondence Type: Web Form
Correspondence: the Bible. God made animals first. He also collected animals in Noah's Ark after the big flooding and then Animals and humans will live together. The Lion would live next to the sheep. Why people can't get this message? Why people don't have any respect to animals, nature and our planet? What is wrong with people that can't leave alone other animals in the wild? if God created animals . Why people are so stupid and don't get the message? God loves his animals. We are not going to live on Earth forever. what ever you have here, you will leave it here. Nobody owns nothing, nobody will keep a piece of land and will take it when it dies, no cars, no homes, no money. So why these discusting people is so attached to everything. It's mine mine and only mine. Nobody knows if We will end in hell or in Heaven, so Why so much attitud, arrogance ext. Only God has the power of his planet. It's God's planet, his animals and his nature. Japan and Sri lanka had a Tsunami. Did you see how everything was taking by the sea and Earthquake? The same thing will happen with tornados, floods, fires, earthquakes, ext...it can happen anywhere. Love God's creation, share your life with other, help animals in need. They will appreciate you kindness more than a friend. God will reward you. Life is too short and is becoming very short for all of us. Everytime someone hurts, abuse and do bad things to animals. bad karma will come back. What it goes around comes around and I have seen it.

Correspondence ID: 2839 **Project:** 11759 **Document:** 38106
Received: May,06,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I value the National Parks even though I do not visit them. The Golden Gate parks are of special interest because they are relatively close to home and would not require a large cash or time outlay to visit. We need all the beauty and nature we can get near our highly urban areas. Please keep them safe and free from damaging activities.

Correspondence ID: 2840 **Project:** 11759 **Document:** 38106
Received: May,07,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive

Correspondence 2841 **Project:** 11759 **Document:** 38106

ID:

Received: May,07,2011 09:15:19

Correspondence Web Form

Type:

Correspondence: I believe that it is important to restrict loose dogs from areas where they endanger wildlife. It would be good to have enclosed areas dedicated to loose dogs.

Correspondence 2842 **Project:** 11759 **Document:** 38106

ID:

Received: May,07,2011 10:21:14

Correspondence Web Form

Type:

Correspondence: Dear National Park Service,

As a dog owner and I speak in favor of protecting the snowy plover habitat. My dogs can be walked in a number of places and are. I would have deep remorse if my dogs disturbed endangered animal habitat.

Although I see many postings of material on the shoreline where I walk my dogs, I keep mine on leash and try to calm down those that have their dogs off leash. Just because something has been done for a long time doesn't

mean it is the right thing to do. Just witness the world prior to the Clean Air Act.

I support the National Parks in many ways, not the least of which is paying taxes to keep them open, attending them and paying fees, and renting campsites that permit animals (and paying extra for the privilege). Please on behalf of my children and their children, do the right thing even if it isn't popular.

Thank you,

Julie A. Dull

Correspondence ID: 2843 **Project:** 11759 **Document:** 38106

Received: May,07,2011 00:00:00

Correspondence Type: Web Form

Correspondence: This park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and especially more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your concern in creating a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 2844 **Project:** 11759 **Document:** 38106

Received: May,07,2011 13:23:05

Correspondence Type: Web Form

Correspondence: You have succeeded in creating a huge kerfuffel that divides friends and

neighbors. An extensive education program with good signage alerting dog owners to some problems their animals might cause in a particular area should be enough. It's obvious that dogs are an important part of the urban scene and many people rely on their companionship in their lives. Please don't go forward with your existing plan.

Correspondence ID: 2845 **Project:** 11759 **Document:** 38106

Received: May,07,2011 13:45:41

Correspondence Type: Web Form

Correspondence: I have lived in the Marina neighborhood for almost 20 years, most of those years without a dog, and in the last 5 years with a dog. In all those years when I was not a dog owner, I was completely fine with people who had brought their dogs off leash and had not a single unpleasant incident on Crissy Field or a lot of the trails in Marin mentioned in this document. I have found almost universally that people have well behaved pets, and pick up after their dogs. I do not understand why there is any change in policy being contemplated - it seems that the various users of the park have co-existed quite harmoniously for all these years and this whole process of changing the policy is a waste of taxpayer time and money and should not be pursued.

I have several comments:

1. Changing the existing policy is not reasonable in an urban park in the middle of the city -- I am quite respectful of not taking my dog along or having him on a leash when I go to parks that are not city parks -- Yosemite, etc.
2. Today, as a dog owner I am aware of only a handful of places nearby where I can take my dog off leash to walk, hike, or play, and your change in policy would make such nearby options non-existent and significantly reduce the joy of many, many dogs and their owners
3. I read recently that there are more dogs than children in the city of SF -- so you should consider that many SF residents view their dogs as their children -- and I have to say that most dogs I have met are better behaved than some human children -- you don't dare make humans put rambunctious human children on a leash
4. Given the windy, and often cold nature of SF weather, in fact the most frequent use of many of these areas is humans walking their dogs, or walking by themselves and not picnickers or little children
5. It sounds like a few bad incidents are driving this change in policy - you

must keep in mind that whatever rule you implement, there are always going to be a few bad apples that spoil the lot -- I do not think that is valid reason to change an existing policy that has functioned without significant conflict for so many years

Correspondence ID: 2846 **Project:** 11759 **Document:** 38106

Received: May,07,2011 15:42:07

Correspondence Type: Web Form

Correspondence: While the Golden Gate National Recreational Area is not a national park one of its missions is none the less to protect natural and cultural resources. Recreational activities must be compatible with this requirement not to negate it.

Endangered species should have a significant level of protection from human activities/disturbances. This degree of protection should be in the range of 90+%

It should be the goal of the recreational area to appropriate uses for all groups of users. Perhaps even separate trails for different uses, including dogs while also having some dog free beach areas.

Off-leash dog use areas should be fenced off for protection of the public and especially wildlife, so as not to have an adverse impact on sensitive habitat.

Correspondence ID: 2847 **Project:** 11759 **Document:** 38106

Received: May,07,2011 16:16:12

Correspondence Type: Web Form

Correspondence: I am the owner of three scent hounds which love to be allowed to search and chase and I would love to allow them to do so, but I do not do so anywhere, as I value the sake of wildlife, far more than the pleasure of my hounds.

I visit GGNRA frequently, even though I live over an hour away; I make the effort to visit, because GGNRA is such a unique and special environment, but for years I have been distressed by the number of dogs which visitors/owners allow to either run about free or, are on long reel leashes and, therefore, have a wide enough radius to disturb wildlife.

Much as I'd like to bring my hounds with me on my visits to GGNRA, I never do so, simply because I believe that dogs are inappropriate anywhere within GGNRA; yet, on my visits, I witness everywhere I go, the seeming lack of restrictions (or the enforcement if such exist) on the presence of dogs and almost invariably, those dogs are making the lives of wildlife,

miserable!

This is not, of course, the fault of the dogs, but rather, that of insensitive and/or uncaring, owners who, may proclaim their devotion the cause of wildlife habitation, but when it comes to actually sacrificing a bit by curbing their dogs, selfishly do otherwise.

I urge NPS to restrict the presence of dogs within GGNRA, to the maximum extent possible, as the needs of wildlife, should predominate over the desires of humans and our dogs.

Correspondence ID: 2848 **Project:** 11759 **Document:** 38106

Received: May,07,2011 16:55:45

Correspondence Type: Web Form

Correspondence: Please keep voice-control areas and off-leash dog areas as available as possible. As a dog owner, I always want to bring my dog with me when we go out on the weekends to the beautiful parks and fields that San Francisco has to offer. It is cruel and unfair to have to leave my dog in a small apartment on a beautiful weekend day if we decide to enjoy the weather. As a dog who loves to run and play fetch, it is almost as cruel to have him on a leash at all times and prohibit him from doing what he loves the most. From my experience at off-leash dog and voice control dog areas, dogs who consistently go to those areas and learn how to socialize with other dogs and different people grow up to balanced and stable dogs. There is nothing more enjoyable as hiking on a beautiful day with my dog or playing fetch at the beach. While I understand that the national parks must accomodate all types of people, it would be negligent to ignore the 60% of Americans who own dogs.

After a review of some of the proposed zoning areas, I would like to voice my support for plans with voice-control or designed off-leash areas. I would like to make a special plea for the Marin Headlands Trail proposed on Map 7-A that has voice-control and on-leash trails. The Marin headlands is an amazing place to hike in an astonishingly close proximity to the city - a combination that is rare in this country. Being able to hike there with my dog is sheer bliss. Additionally, please keep the Crissy Field zoning to the designation on Map 10-A. This public space is again unparalleled in this country in terms of dog friendliness. Even without my dog, the sight of dogs happily running and playing the grass and on the field never ceased to put a huge smile on my face. The field is the perfect place to play fetch my dog, and it is near impossible to get him out of the water to go home.

I used to live in Boston, MA, where dog friendly spaces are few and far between. We were limited to a small grassy field in the mornings, and

would often be kicked off the field for softball games. Since there was no where else to go in the area without a car, I would have to take my confused, energetic dog back home. The steps San Francisco and the National Park Service has put in place to open outdoor spaces to dogs and humans alike is amazing, and it would be a shame to take that away.

Correspondence ID: 2849 **Project:** 11759 **Document:** 38106

Received: May,07,2011 17:01:58

Correspondence Type: Web Form

Correspondence: I want to comment about the DEIR on the issue of personal safety. I walk my dog about once a week on the Los Altos Trail and Oak Valley Trail. My wife and I are senior citizens and we gain benefit, both mentally and psychologically from these dog walks.

We would take these walks without our dog but we feel safer having her along. I think that our personal safety must be a real issue with the Park Service since you now allow people to carry concealed weapons for their personal safety, so I am appalled that there is no discussion in the Law Enforcement Appendix J detailing any law enforcement issues besides those associated with dogs. Should even untrained citizens carry weapons for personal safety?

In our area of walking I notice that Oak Valley Trail has no instances of citations or conflicts, yet the preferred alternative eliminates the possibility of walking in at the top of Donahue and exiting via Tennessee Valley. This is over reacting to an area that your own data shows not problems in the current usage pattern.

Finally in the appendix G showing other dog walking areas, there is a serious error concerning Ring Mountain, where dogs are only permissible on leash. This area is both an on leash area and carefully patrolled.

I am not familiar with the other areas in your DEIR but based on this review of the areas I know well, I believe you are becoming over restrictive and your policies will create law enforcement attention where no resources are needed. Please focus attention where there are real problems and conflicts, and please make an effort to remove concealed weapons from our parks and natural areas. Handguns are the real danger.

Thank you for your consideration,

Michael Sheats

Correspondence 2850 **Project:** 11759 **Document:** 38106

ID:**Received:** May,07,2011 21:26:37**Correspondence** Web Form**Type:**

Correspondence: I am concerned about the continuing negative impacts of allowing dogs full access to the entire area without designated no-dog areas and an enforced leash law. In the GGNRA we have already lost one species on the endangered species list, with other species threatened by dogs. Dogs are not a natural predator in the area, but rather a man-made one. Thus, it is imperative that the National Park keep its rules in place at ALL its sites in the country, including San Francisco. There are now more dogs than children in the city - with dog owners demonstrating a complete inability to provide balance and compromise to the dialogue on this issue. Since the public has demonstrated that they are incapable of policing themselves and their animals, it is up to the National Park Service and the City of San Francisco to enact and enforce these protections for whatever wildlife remains within the city. There seems to be no danger of the extinction of dogs, thus it is and will continue to be an issue that must remain high on the priority list for enforcement.

Correspondence ID: 2851 **Project:** 11759 **Document:** 38106**ID:****Received:** May,08,2011 07:43:08**Correspondence** Web Form**Type:**

Correspondence: I'm a volunteer at the Lindsay Wildlife Museum and strongly feel that our wildlife needs to be protected from dogs (and cats). Many of the animals we treat are victims of dog bites. We need to protect the remaining habitat of our native wildlife. Dogs off leash are dangerous to wildlife and to humans.

Correspondence ID: 2852 **Project:** 11759 **Document:** 38106**ID:****Received:** May,08,2011 08:35:40**Correspondence** Web Form**Type:**

Correspondence: Dear Sir/Madam,

Under all of the proposed alternatives (except "maintain status quo") dogs will no longer be able to retrieve sticks from the ocean anywhere near the Bay Area. Since many breeds of dogs are genetically programmed to to play fetch at the water's edge, these animals are basically doomed, and the only humane response is to remove them from the Bay Area or euthanize them. I find it unacceptable and absolutely scandalous that after all the taxpayer money that the NPS has spent on this issue that every alternative on the table represents an existential threat to water oriented retrievers, and I will therefore vote for any politician who promises to wrest control of the

GGNRA away from the NPS. Anybody associated with the proposed plans should be deeply ashamed. Shame on you, shame on you, shame on you!

Marcel Houtzager

Correspondence ID: 2853 **Project:** 11759 **Document:** 38106

Received: May,08,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I urge you to protect the parks, and balance wildlife protection with recreational uses of the parks. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2854 **Project:** 11759 **Document:** 38106

Received: May,08,2011 13:52:28

Correspondence Type: Web Form

Correspondence: Although I am a member of the Wildlife Society and am presenting research in May to the 2011 International Wildlife Management and Planning Conference, I oppose the plan presented by the GGNRA.

1. The conclusions of the Environmental Impact Study do not follow from the data or cited research. For example in the environmental impact study, Executive Summary xxi (26/269) where they discuss Fort Funston they conclude that "Coastal community wildlife would experience long-term, moderate to major, adverse impacts from the no-action alternatives". No direct data really here. In Table 6 of chapter 4, very few incidents reported in all of GGNRA except for some in the snowy plover area for dogs disturbing wildlife. Only 2 at Fort Funston for the reporting period. p. 11/69. The literature they cite in the report in Chapter 4 around p. 1115 (9/714 in

pdf) notes that "A study by Forrest and St. Clair showed that 'off-leash dogs have no impacts on the diversity or abundance of birds and small mammals in urban parks' . . ."

2. The EIS fails to evaluate the impact on local parks by the displacement of dogs out of the traditional recreational areas into the city of San Francisco.

3. The plan is quite dismissive of the impact on small business, the professional dogwalkers, and a separate cost-benefit analysis must be conducted in this regard (see p. 24 of Chapter 1, (72/269)). They dismiss this socioeconomic impact since "Estimated total spending by all local visitors to GGNRA accounts for 0.0008 percent of total GDP for the San Francisco MSA . . ." Of course, any specific group of small business will account for a small proportion of the regional GDP. In terms of the number of jobs, this could be quite high.

4. The cost of the plan, focused on managing dogs, is quite high and could be better spent on improving the environmental quality of larger areas of GGNRA where current traffic is not as high, and for providing support for environmental groups engaged in specific activities related to managing habitat such as for the snowy plover. Although monitoring seems focused on dog compliance, in the spirit of Adaptive Resource Management, the GGNRA should monitor data related to specific goals relevant to environmental quality.

Correspondence ID: 2855 **Project:** 11759 **Document:** 38106
Received: May,08,2011 18:03:55
Correspondence Type: Web Form
Correspondence: To Whom It May Concern:

I am appalled at the "Preferred Alternatives" that are being thrust upon us responsible dog owners living in Marin/San Francisco. We are not getting a fair shake. It sounds like the decision has already been made but that you are just "listening" to us (both in person and online/by mail) to appease us and make us feel that we were heard.

This morning my 11 year-old spaniel and I spent two hours walking at Crissy Field (off leash). I cleaned up after her, she went in the water and played with other dogs. I got to chat with friends. This may not change at Crissy Field, but what about other places and the impact it will have upon other parks? Fort Funston is a favorite of ours and I see lots of friendly, well-behaved dogs having fun with their owners.

Please understand that this decision will have far-reaching negative effects.

You cannot squeeze all the dog owners in to small areas. Instead, maybe the few who ruin it for others with their out-of-control dogs or owners who do not pick up should be cited. Please don't punish us all.

Thank you.

Sincerely, Wendy L. Jawor

Correspondence ID: 2856 **Project:** 11759 **Document:** 38106

Received: May,08,2011 19:08:11

Correspondence Type: Web Form

Correspondence: I am in favor of as much off leash dog walking as possible. Since humans have domesticated dogs, we now have responsibility for them and need to allow them as much free running play time as possible. I don't own a dog myself but enjoy watching and inter-actling with dogs at parks and at beaches like Crissy Field. Of course provision should be made for protecting areas that are sensitive wildlife habitat. It seems to me this would have to be on a case by case basis as there are so many different GGNRA areas. But I think there is enough space to protect habitat and wildlife and still have a lot of space for off leash dogs. I have found most dog owners are responsible, clean up after their dogs, and train their dogs well to follow voice command. Irresponsible dog owners should, of course, be sited, rather than taking privileges from those who are responsible.

Correspondence ID: 2857 **Project:** 11759 **Document:** 38106

Received: May,09,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. Please limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Meg Pelose

Correspondence ID: 2858 **Project:** 11759 **Document:** 38106

Received: May,09,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As I understand it the park's mission is to PROTECT the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2859 **Project:** 11759 **Document:** 38106

Received: May,09,2011 10:39:47

Correspondence Type: Web Form

Correspondence: I have read the summary and the preferred alternative plan. I believe this is an excellent plan to adjust different priorities to different areas within the GGNRA. I believe the overall review and implementation of a revised plan is a good idea, but I do not like Alternatives C or D if they were to be implemented across the board. Your preferred alternative plan is an excellent compromise, recognizing areas such as Crissy Field and Stinson Beach as areas that need less stringent regulations than offered by Alternative D. As a dog owner I recognize my responsibilities, and certainly hope that there will be enforcement of the regulations on professional or amateur walkers of multiple dogs, who at times appear to have limited control of all the dogs in their care.

Correspondence ID: 2860 **Project:** 11759 **Document:** 38106

Received: May,09,2011 12:34:50

Correspondence Type: Web Form

Correspondence: Let me add my voice to the chorus: we need off leach dog walking areas in San Francisco and Crissy Filed is the perfect site. Certainly the problems can be manged so that you don't have to deny dog owners -- and their companions -- the joys of an off-leash stroll along one of the most beautiful walkways in America. Bill Hancock

Correspondence ID: 2861 **Project:** 11759 **Document:** 38106

Received: May,09,2011 13:57:18

Correspondence Type: Web Form

Correspondence: I have worked for the environment for over 20yrs professionally including in several state parks. I am also a responsible dog owner. This management plan further restricts access to areas that I can enjoy with our family dog. As a member of our family, we would no more go walking without our dog than we would without our children. People who do not have this kind of relationship with their dog will not understand, but I am sad for them. Dog management policies are being driven by people who do not understand that dogs are not just "pets", but family members and it angers us to see them treated unfairly. I understand there wildlife and public safety arguments for limiting dogs, but, aside from protecting listed species, where neither humans nor dogs should be allowed to do harm, it is wrong to cast all dogs as being dangerous when only a few are in the same way that with people, there are good ones and bad ones. Park access is not being limited to people because they are poorly behaved, and neither should dogs. Poorly behaved people are subject to tickets and arrest - dogs should face the same, but not be found guilty before having committed a crime. These policies are alienating some of the strongest advocates for parks - dog lovers probably love wildlife and open space more than the average visitors. So down the road, when you wonder why more people are not showing up to support the GGNRA you might look to your dog management policies as a group of people you lost. If you need to charge a fee for dogs- fine. I support access and if there is a reasonable charge for extra costs, I am fine with that though I personally think parks should be well funded and free to citizens - a perspective that I am sure GGNRA management would like to hear more of - only if they show they don't respect my family includes our dog, they will not have me as a vocal supporter.

Monty Schmitt, San Rafael

Correspondence ID: 2862 **Project:** 11759 **Document:** 38106

Received: May,09,2011 14:27:08

Correspondence Type: Web Form

Correspondence: Please do not allow dogs on Crissy Field or the East Beach there. A few

years ago, before I knew that the East Beach had been taken over by dogs, I thought I would show the incredible beach (newly available to the public) to some out of town guests. We bought some pizza, and with our young toddlers and children, sat down in the middle of the East Beach. Within minutes, dogs were howling at us, threatened our children, and only then, as we nearly ran out of the beach, did we notice the dog feces all over that beach! Millions of dollars were spent to bring to the public this INCREDIBLE beach-front property. Larry Ellison, in bringing America's Cup to the Bay area, has called this area "the best natural amphitheatre that God could have created." Do not let such a priceless area get ruined by dogs and over-run by dog feces. San Francisco has lots of city parks where dogs run free. Do not let them take over this incredible beach. Fort Funston has been completely LOST to dogs. Ever taken a child there for a walk? You are surrounded by hundreds of threatening dogs! We should all make a stand and take back our priceless ocean front parks! Thanks for your attention to this matter.

Correspondence ID: 2863 **Project:** 11759 **Document:** 38106

Received: May,09,2011 15:27:02

Correspondence Type: Web Form

Correspondence: This is a very sad day. I will longer support the National Parks, the GGNRA, the Presidio Trust if this sweeping plan comes into affect.

People who own dogs and use the GGNRA to walk them are the eyes and ears for the park. We pick up trash, we report injured or washed up animals and mammals, we literally police the place regularly reporting any and all problems. The beaches are most often empty except for dog walkers with the exception of hot days and weekends. . The problem is not that dogs are off leash but that a tiny minority of dogs are not under control. You are throwing the baby out with the bath water! I do not allow my off leash dog into the protected cordoned off area of the beaches.

Training is the issue...so address that. It would be fine to require a license for having a dog off leash, we would all benefit from dogs that are well trained. It would also be fine to post signs requesting that dog owners are respectful when the beach is used by others and perhaps leash their dogs at that time. Also, that dog owners do not allow their dogs into nesting areas. Another idea would be to limit the number of dogs one person can have off leash in the GGNRA. Perhaps it is the professional dog walkers that are the problem here.

This is no ordinary National Park, GGNRA is an URBAN Park. People live here. Dogs are very important to many lonely people who rely on their dogs for comfort and company. You are discriminating against all those people

by such severe restrictions.

This is not a balanced approach but a response to a few noisy complainers and one issue voters. The Park has compared the impact of motor vehicles on beaches to the impact dogs have, such a comparison is ridiculous!! Even dog owners like the Western Snowy Plover and are concerned with it's survival. You would think we were all going about setting our dogs on the bird purposefully!!

More can be done with signs and raising public awareness. Isn't that better than more regulation and legislation? The GGNRA does not have the manpower to police the beaches, they need us to help and we are willing and enthusiastic. Just give us a chance. It is always better to teach people and use them to help instead of alienating people and there are many, many dog owners in the Bay Area. All those people can help protect wildlife with out draconian plans such as this one. Vivien MacDonald

Correspondence ID: 2864 **Project:** 11759 **Document:** 38106
Received: May,09,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your consideration.

Best regards,

Nancy Treffry

Correspondence ID: 2865 **Project:** 11759 **Document:** 38106
Received: May,09,2011 16:59:46
Correspondence Type: Web Form
Correspondence: This plan is extreme to the point of ridiculousness. Dogs should be handled responsibly, just as children, vehicles, and camping should be. To prohibit so much recreation area from dogs would only prohibit responsible people from taking their dogs to those areas. The problem people (dog walkers, etc) would still continue as it is obvious this plan could not be adequately enforced. It is going from one end of a spectrum to the extreme other. How about making some areas off leash, but leaving the ones that already see great use as they are. "Recreation" is NOT defined as an activity excluding dogs! We hope you have the sense and decency to recognize that there are many, MANY of us with dogs who do NOT abuse the beautiful wild areas and will feel prohibited from even going into them if this silly plan passes. Please act from a sense of moderation and realism when going forward. Thank you!

Correspondence ID: 2866 **Project:** 11759 **Document:** 38106
Received: May,09,2011 17:04:11
Correspondence Type: Web Form
Correspondence: On the Alta trail, it is a giant dog park. People do not have their dogs on leashes. Dog watchers bring their dogs there to run without leashes. Many are large dogs. When I go hiking there with children, most times the children are afraid of them. I think that they should be on leashes for safety for all! To be under voice control has been proven useless.

Correspondence ID: 2867 **Project:** 11759 **Document:** 38106
Received: May,09,2011 17:17:20
Correspondence Type: Web Form
Correspondence: I am in opposition to the proposed plan.

The plan is short-sighted, targeting responsible dog owners who present threats to the public's enjoyment of these areas. If implemented, this will divert significant amounts of very limited public safety officer time to what is at best a nuisance; distracting them from actually providing for public safety.

Ultimately, the plan is unenforceable as dog owners, who know that dogs

must be vigorously exercised to remain healthy, will default to keeping their pets happy and healthy. To enforce the plan, limited public dollars will need to be allocated to punishing owners of healthy, non-threatening dogs. For the elderly and disabled (those who cannot run or jog to exercise their dog) this is an especially heavy burden.

As the areas proposed for closing have been defacto off-leash areas for more than a generation, without significant user conflict or significant threat to wildlife or habitat, the proposed plan should be significantly revised.

Thank you.

Correspondence ID: 2868 **Project:** 11759 **Document:** 38106
Received: May,09,2011 00:00:00
Correspondence Type: Web Form
Correspondence: o

Correspondence ID: 2869 **Project:** 11759 **Document:** 38106
Received: May,09,2011 17:53:47
Correspondence Type: Web Form
Correspondence: Dear GGNRA,

My small family just moved to the Presidio and we love living in the park. We waited patiently, for a year and a half, for a place to become available that fit our lifestyle. My wife is a San Francisco native and has many wonderful stories about exploring the Presidio as a child. We can't wait for our children to have the same experience. Our move to the Presidio made perfect sense as we found that we were spending the majority of our recreation time in the park with our dog Hudson. "Huddy" is a pointer (a rescue pup) that needs lots of exercise. When we were living near the Panhandle we would run into Golden Gate park every morning. Running on-leash is a frustrating experience. Hudson is a hunting dog and needs to sprint much faster than I can move. Hudson has been trained by a professional birddog trainer to hunt and respond to voice control. Crissy field is the perfect place for us to train and exercise. We found that we were running on the field or swimming in the bay 3 or 4 times a week. Not only is this good for Hudson but it is good for me. I lost 20 lbs and am now competing in recreational road races. Crissy field is not only a special place for us. We meet lots of dogs and walkers in the GGNRA. It is a very rare occasion that we see a person on the field without a dog. My wife and I feel exceedingly lucky that we can walk out the backdoor into one of our national treasures. We are daily learning more about the flora and fauna, especially the birds, that we share our home with. We were devastated to learn of the Dog Management Draft and the preferred alternative to limit off leash recreation

to a fenced-in area. I am grateful that the comment period has been extended so that I may tell our story, respond to the draft and suggest a solution. It was my understanding that the 1979 Pet Policy designated Crissy field as a voice control area. Why not enforce that? If a dog is not under voice control they should be on a leash. Secondly, I think the post and cable fences work very well. I have only seen a dog inside of this area once in the 4 years we have been visiting Crissy field. Why not expand these areas? Not only do they work to keep dogs out but they also keep people off of the sensitive habitats. I would like to respond to the argument that the GGNRA should be consistent with NPS regulations. In brief, it is my opinion that the 1979 Pet Policy is good legislation and if it is not broke we don't need to fix it. In 1978, the GGNRA took the position that "the ordinary guidelines outlined in the Code of Federal Regulations do not really apply in an urban area," and that "people and their animals have been visiting the park for too long to apply an all-inclusive arbitrary policy." Based on that position, the GGNRA, with a great deal of public input, drafted what is now known as the 1979 Pet Policy; and it is working just fine. Finally, I know a number of off-leash dog walkers that plan on ignoring any legislation you put in place. Please consider how you will enforce new rules and how that will affect the residents and visitors of the Presidio. Thank you for providing a forum for comments on the changes you would like to make in the GGNRA. I have asked my friends and family to comment and hope they will support me in opposing the Dog Management Draft.

Sincerely, Brett Dewey

Correspondence ID: 2870 **Project:** 11759 **Document:** 38106
Received: May,09,2011 18:01:11
Correspondence Type: Web Form
Correspondence: As a regular visitor to a number of national parks, particularly the Golden Gate National Recreation Area, I am appalled by what owners allow their dogs to do on- and off-leash at the parks: chasing wildlife, digging, jumping on people, etc. I enjoy animals very much, but do not like being disturbed by someone's dog while I am hiking or walking. I would like to see stricter restrictions on dogs. If owners want their dogs off-leash, they should take them to dog parks or other areas where they do not disturb people, plants and/or wildlife. While not all dogs and owners behave this way, unfortunately, too many do -- and ruin the experience for others.

Correspondence ID: 2871 **Project:** 11759 **Document:** 38106
Received: May,09,2011 18:19:26
Correspondence Type: Web Form

Correspondence: Dear GGNRA,

I recently moved into the Presidio, and absolutely love the gift of getting to live in one of our National Parks. I grew up playing in the Presidio and truly believe it is one of the most special spots on earth. The geography, the landscape, the wildlife, the current native habitat restoration, the political history - it is most certainly a one of a kind. I also now enjoy easily walking to Crissy Field with my dog from our new home - a place I have been playing since I was a child - flying kites with my dad, watching the Blue Angels, and generally enjoying the beauty of the area over the years. And now I get to enjoy it with my dog, who also loves it! I am on Crissy Field with him daily and I continually notice that the majority of people there are other dog owners. I am constantly surprised that on even days of nicer weather there are not more people picnicking or generally taking advantage of the field. But the dog owners are! I also have had no bad experiences with other dog owners there. Everyone seems to be responsible, to pick up after their dogs and to generally have them under control. I also see them respecting the native habitat protection areas, as do I. (And for the few poorly behaved, irresponsible dog owners out there, I'm sure they certainly would not be inhibited by new park regulations that they would most likely ignore anyway).

Please reconsider your plan proposal. Living in an urban area there are so few open spaces that dog owners can enjoy and it will be a severe lifestyle detriment to those of us whose lives revolve around taking advantage of our beautiful parks and enjoying them with our dogs. I'm sure most dog owners reading this will admit that dogs can be and are important members of our families and recreating with them in these spaces is vital to all of us.

Thank you for considering my comment.

Kind Regards, Morgan Allen

Correspondence ID: 2872 **Project:** 11759 **Document:** 38106
Received: May,09,2011 19:46:02
Correspondence Type: Web Form
Correspondence: To Whom It May Concern,

I am a recent resident to the Bay Area. I moved here from Southern California, and when I arrived I brought my dog, Etta, with me.

In Del Mar, we had "dog beach," where during certain times of the year dogs could run off-leash and enjoy the ocean and the company of other canines. But I have never experienced anything like Fort Funston in my

entire dog-owning life.

When I took Etta there for the first time, it was literally like we had arrived in dog heaven. The dogs - and their owners - were all ridiculously friendly and respectful, and Etta could finally run to her heart's content without the restrictions we've encountered in so many other places along California's coast.

As a travel writer, and the owner of a website with a section devoted specifically to traveling with pets, I can tell you that the appeal of having a place where dogs can run free is huge amongst dog-owning travelers. There are hundreds of thousands of people who make their decisions as to where to travel based on how pet-friendly a city is. San Francisco has set itself apart from other travel destinations for many reasons, but the availability of so many great leash-free zones for dogs is a significant contributor to the reputation of this city.

I have admitted that I am a recent transplant, but I can tell you that a huge part of the reason I brag about where I now live is because of all the great places I can enjoy with Etta.

At a time when there are so many budget constraints on not only the state, but the county and city as well, do we really need to be spending time, money and resources on cordoning off areas that are dog-friendly and utilized by so many? I'm not sure why we are even having this debate in the first place. Everyone at Fort Funston (and the other areas under consideration for regulation) seem exceedingly content at having these wide, open spaces to enjoy with their families and family pets. So what, exactly, is the reason for changing the status quo? If the system isn't broken, why is are you trying to "fix it"?

I am firmly committed to promoting the city as a dog-friendly city. But if that changes, then I will be just as committed to letting my readers know that it is no longer a pet-friendly town. So I remain hopeful that here in San Francisco, we will be allowed to have our outdoor spaces remain as they are so that we can continue to enjoy the 'great outdoors' together.

Sincerely,

Erin Caslavka

Correspondence ID: 2873 **Project:** 11759 **Document:** 38106
Received: May,09,2011 21:47:02
Correspondence Type: Web Form

Correspondence: The proposed rule changes at Fort Funston are not supportable by the document produced by the park service. Restricting off leash use of the park to 10% of the land currently available is not supported by the science submitted here, and is in no way consistent with the historical use of this land. The park administration may wish that the park were different than it currently is but it has become a major drawing point for San Franciscans to recreate with each other and especially with their four legged companions.

The GGNR represents one of the last areas where inhabitants of the Bay Area can allow off leash recreation of their canine companions and the other areas are small fenced in patches of dirt distributed around the developed urban areas. When you are responsible for the care and exercise of one of the larger breeds of dog or, as in my case, a sight hound, areas large enough for our companions to break into a full run are essential.

This report lists every conceivable wild "critter" that resides or may transit through the park as if they are sacred -with one exception, dogs. The report refers to the animals that exist as parts of our families as if they are pests to be tolerated up to a point, and that is a very low point. There are stated concerns regarding the preservation of rusting, rotting World War II battlements (which of course have no actual involvement with the war other than as visible tributes to overly rampant paranoia as they were never close to the war front). These are referred to as cultural resources and presented as something to protect although the real threat to their continued degradation are the children that play in them not the dogs that pass by.

There are hundreds of pages describing soils, geological features, endangered and unendangered wildlife and plants and a lot of speculation as to how dogs might impact each of them - which on most counts is minimal even when theoretical; but there is almost no real science regarding the measured impact of dogs on any of these. The increasing presence of dogs is well documented and the authors of this proposition express a concern that the park resources and "values": "could be compromised to the extent that, without action, those resources and values in some areas of the park might not be available for enjoyment by future generations"

Could be? Might not? With the ongoing and increasing presence of canines in the park at least since the institution of the Pet Policy in 1979, there should be demonstrable proof of whether and to what degree dog presence impacts on the park. That evidence is lacking here. There is no evidence that dogs have impacted the "sensitive dune tops" at Ft Funston but the prediction is that they will if things continue as they are. OK then why can't we measure that impact yet? Humans digging at the cliff bases cause much more erosion than the few dogs on dune tops (because most owners keep their dogs away from the cliff edges).

The Snowy Plover and Bank Swallow populations have increased despite the increasing dog presence so why is a negative impact predicted? I have volunteered at the Marine Mammal Center for the past 4 years and I can assure that Guadalupe fur seals and Stellar Sea Lions are not endangered by the dogs in the park, they are already in dire straits when they beach and are swiftly identified and rescued. As for the flora of the GGNRA from the report it appears that the greatest threat to native flora is not dogs, it is the non-native species of plants planted by the park administration for various reasons but mostly to diminish erosion. So the record would suggest that machination by the park overseers is the most concerning threat where plants are concerned.

The views and opinions of those who would like to see dogs in the park and those who don't are presented as if equal here, but which population actually represents the vast majority of those utilizing the park? Shouldn't the views of those who actually visit the park be considered with more weight?

Of all the different benefits that the GGNRA can provide and promote, I would submit that the nurturing of the ongoing health and happiness of the Bay Area Canine population should be first not last in the list of aspirations for the park. Recent data indicates that the relationship between man and dog goes back not 10,000 years as once believed but at least 30,000 and more likely 100,000 years. Senior citizens with canine companions live longer and healthier lives. AIDS patients live longer and better quality lives with pets. Dogs provide sight for blind humans and hearing for deaf humans and rescue seizing humans from harm and can even prevent seizures. Dogs provide autistic children with an avenue for normalizing socialization, they benefit the severely mentally challenged, and improve the lives of those living with Bipolar disorder. Dog therapy in hospitals has been proven to lower blood pressure, diminish stress in patients as well as the nursing staff, identify dangerous sugar swings in diabetics and facilitate recovery. In almost every clinical situation studied the addition of the canine presence improves the health and well being of humans. Dogs can detect Breast, Lung and bladder cancer. And now it appears that dogs are useful in fighting terrorism as well.(In case you hadn't heard a vital member of the Seal Team Six that took out Bin Laden was a dog)

Last but not least dogs improve the quality of the lives of millions of regular folk in the U.S. The use of the GGNR to maintain the health and well being of these amazing creatures is a supportable and excellent use of the resource. Alternative "A" is the way to go.

Correspondence ID: 2874 **Project:** 11759 **Document:** 38106
Received: May,09,2011 23:07:12
Correspondence: Web Form

Type:

Correspondence: I was living here in 1972 and supported turning the Presidio over to the National Park Service as a recreation area, where dogs could run and play. I think that the NPS is more interested in preservation than recreation and that is not the goal of Chrissy Field for most San Franciscans. When I look at Chrissy Field today - with the dogs, this is just what the community wants. I believe in preservation, but I don't believe that anything is going to become extinct just because dogs are allowed at Chrissy Field. And for those people who don't want to be around dogs, there are plenty of dog-restricted places nearby. Please DO NOT incorporate the dog management plan is now written. Thank you for your consideration.

Correspondence ID: 2875 **Project:** 11759 **Document:** 38106

Received: May,10,2011 07:47:39

Correspondence Type: Web Form

Correspondence: I strongly oppose curtailing the off leash status of dogs at Crissy field and adjacent areas. This has been a historical precedent for many years, and this status allows San Franciscans to have one of the worlds best spaces for exercising their dogs. A leash law will require a large number of Park Service Staff to constantly remain on site to enforce the law, thus straining both staffing of the Park Service and the relationships between San Franciscans and the Park Service. I see no evidence of harm as a result of the long-term off leash status of dogs in these limited areas of the PARK, and do not feel that there is a benefit whatsoever to alter this historical precedent.

Thank you.

Brian Andrews

Correspondence ID: 2876 **Project:** 11759 **Document:** 38106

Received: May,10,2011 08:53:48

Correspondence Type: Web Form

Correspondence: I am so thrilled that this issue is finally & courageously being confronted. As a runner & walker I have for years been confronted by out of control & aggressive dog owners. I have been slandered, threatened & bitten many times. It has made me want to start carrying a gun & spread poison. I support the maximum dog controls possible & further recommend that the burden of economic impact be put directly on dog owners. Thanks for hearing me.

Correspondence ID: 2877 **Project:** 11759 **Document:** 38106

ID:

Received: May,10,2011 10:05:17

Correspondence Type: Web Form

Type:

Correspondence: I enjoy walking Crissy Field on a regular basis. While many dog owners are respectful - there are many who allow their animals to run in areas clearly marked otherwise. I have had dogs off leash jump up on me, run into me - while the owner only offered a limp "sorry". All could have been avoided with a leash or taking the animal to a designated area to run free. I don't believe new regulation is needed - just enforce the laws all ready in place.

Correspondence ID: 2878 **Project:** 11759 **Document:** 38106

ID:

Received: May,10,2011 10:54:02

Correspondence Type: Web Form

Type:

Correspondence: I see the problem as who is going to police these policies? With the parks strapped for cash there are not enough rangers to enforce the current "No Pet" locations. Yesterday, I was at the trail head at Tennessee Valley at 10 am. There was a bobcat right near the picnic tables. There was a group of women observing the bobcat. While they were doing this a friend of the group's was approaching with a small dog in a backpack which was not zipped up all the way. One of the group members noticed this and yelled to her friend to zip up the backpack quickly so that the dog would not jump out and get eaten by the bobcat. Once the bobcat moved on the group proceeded to ignore the signage and start hiking down the trail which is clearly marked NO PETS even after they had just observed a wild animal in it's natural habitat a light did not go on to say "This is why pets are not allowed here. This is someone's else's natural habitat." If only a ranger had been there. Today, I was once again out at Tennessee Valley. This time I was on the trail with a friend. A group was approaching us that had a white fluffy dog on a leash. My friend stopped to tell the group (politely) that dogs are not allowed on this trail, did they not see the sign? The women responded that a man had already told them that and that my friend should get a life. This was done in a rather angry tone. Again, if there had only been a ranger there. I am out on the trails regularly where I regularly see dog walkers disregarding the rules. Therefore, my concern is if we limit dogs even more, even though I agree with this policy, who is going to police and stop the rule breakers??

Correspondence ID: 2879 **Project:** 11759 **Document:** 38106

ID:

Received: May,10,2011 11:51:55

Correspondence Type: Web Form

Type:

Correspondence: I feel strongly that dog owners and walkers have failed to act in a

responsible fashion while exercising animals on many GGNRA lands. Still, it is reasonable to expect dogs to have some access to the vast lands governed by the GGNRA, so I feel that alternative C strikes the proper balance between conservation and the longing of a golden retriever for a bit of a run.

Correspondence ID: 2880 **Project:** 11759 **Document:** 38106

Received: May,10,2011 12:23:01

Correspondence Type: Web Form

Correspondence: Hello,

Thanks for taking the time to view my email. I would like to introduce myself, Darcie DeLashmutt, a San Francisco resident, Landscape Architect, and owner of Roscoe the Doggie. I am writing to express my concern over the portions of the GGNRA Dog Management Plan which impact dog areas and leash requirements in San Francisco.

I am concerned for many reasons, some of which include: - Off leash dog areas are already highly utilized and will likely exceed capacity if the management plan is implemented. - Many dog owners will be required to drive great distances to properly exercise pets, which is not a positive thing all around or for NPS land. - Given our urban setting, the advantages in the Management Plan simply do not outweigh the constraints; it is not an appropriate plan to apply in an urban setting. While I agree with the basis of preservation outlined in the EIS, I feel that the plan is not balanced in a practical way with our urban environment. - As a dog owner I understand that there are very legitimate issues to integrate owner's needs with the needs of other uses, and feel that there are more effective ways to achieve this balance than through the plan.

I hope that all alternatives can be abandoned and current use continues. On a personal note, I had never been to most of the NPS land in the Bay Area after 8 years of residence until I became a dog owner. Now we frequently use the space in a healthful way for all. It has inspired me to volunteer on occasion and have a good impact. In many ways which can not be quantified in the EIS, good things happen as a result of all users enjoying and respecting NPS land. I appreciate your consideration and welcome any questions. I hope we can all work together to keep the plan appropriate for an urban environment and allow everyone to use these public spaces in a positive way. Sincerely, Darcie DeLashmutt Senior Associate

Correspondence ID: 2881 **Project:** 11759 **Document:** 38106

Received: May,10,2011 13:03:51

Correspondence Web Form

Type:

Correspondence: I would love to write a thorough, factual letter expressing my concern over the GGNRA Dog Management Plan, but the fact of the matter is, it is an overwhelming document and not feasible for the average citizen, which I hope the reviewers take into consideration :) Instead, I lend my practical observation and hope that it counts. I have been a San Francisco resident for 10 years, and a dog owner of a sweet rescue named Roscoe for 3 years. I am also a landscape architect who has worked with the NPS extensively, am familiar with environmental concerns and regulations, EIS jargon, etc. Getting a dog opened up a whole new world to me. People are more sociable, I have made lots of friends, I am healthier, and I frequent parks all around the city. It has been wonderful for us and many other people. If implemented, the dog management plan will change and alter that happiness. Roscoe is in the parks for at least two to four hours every day. In all that time, I have never witnessed a single dog attack. There are scuffles here and there, but never anything serious or involving a human. I know it must happen of course. I just feel that that in actuality, it is not of a severity that warrants a serious repercussion against all users. I acknowledge that there are issues with dogs on occasion. There are also issues with other uses. People sometimes trample vegetation, scare birds, or litter. But we recognize that in an urban environment we can't feasibly ban people. I feel the same holds true for dogs. It just isn't realistic in this particular setting. A more positive approach is working together to minimize impacts all around. Educational signage, more trash receptacles, huge fines for littering (how about \$500 for dog or other waste?) could help achieve these goals without restricting the use of people who respect the park land. I also acknowledge that there are good points, concerns and goals in the GGNRA proposal. If the lands involved were in pristine condition, never been used by dogs, and away from a high density of population, I would encourage their implementation. However, the proposal involves urban land. When you stop and think about it on a practical level it just doesn't work. The amount of dogs and people that will be displaced will have negative impacts elsewhere on the cultural and environmental resources. Given our dense urban setting, park lands will never be a truly undisturbed or natural environment with or without dogs. Finally, I acknowledge that some people don't like dogs and many have good reason. Maybe there are two hours of dog free time dedicated every other day so that those who wish to experience NPS land dog-free have that option. Banning and limiting dogs is a slippery slope. Where does it end? Strollers? Teenagers? I am joking of course, but I do feel that there is a more positive solution for all and I hope we can work together to find it. Let's all play together and be happy!

Correspondence 2882 **Project:** 11759 **Document:** 38106

ID:

Received: May,10,2011 13:27:35

Correspondence Web Form

Type:

Correspondence: Dogs at Fort Funston should either be prohibited or restricted to on-leash use. This is a wonderful spot for hikes and picnics, but it has become a de facto dog run, overrun with off-leash dogs that tear up the area and leave their droppings everywhere, and they fight and scare older folks and children. Because it has become so overrun with dogs, others have largely been run out of the area as it is so inhospitable. There is no reason dogs should trump people in the enjoyment of this beautiful area. Anything other than a ban or a leash requirement is impossible to enforce, and those are the only fair and reasonable alternatives.

Correspondence ID: 2883 **Project:** 11759 **Document:** 38106

ID:

Received: May,10,2011 14:31:51

Correspondence Web Form

Type:

Correspondence: I completely oppose the idea of allowing dogs on trails, off trails, or on beaches in the Golden Gate National Recreation Area and all other wildlife habitats and refuges. Dogs are about as non-native, and non-natural as one can get. They devastate the fragile and highly sensitive wildlife that exists in our precious coastal and other habitats.

I used to go walking around Bair Island which is similar to many GGNRA sites and have seen dogs roaming free harassing shore birds during nesting season. It is absolute insanity and a crime against nature.

I urge the National Park Service to take its responsibility to restore, protect, and preserve our dwindling wildlife habitats as fully as possible and not cave in to the dog lobby, as vocal and vehement as they may be. Owning a dog is an option some people choose, however ill-advised the choice may be due to inability for the owner to provide a suitable environment for the health of the animal. The National Park Service and its managed wildlife areas should not be compensation for poor choices people have made who want to own dogs in an extremely dense urban area with precious little open space.

To appease dog owners and to minimize the complexity of managing such an issue, which could easily become a massive hassle for those responsible for implementing and enforcing whatever policies are chosen, I recommend the following:

A clearly demarcated area for dogs to play, which is surrounded by a fence, within which dogs are allowed to be off-leash. All other areas should be off limits to dogs with no exceptions.

Such a policy would be much easier to enforce than say require leashes in certain areas, existing rules for which are consistently broken by dog owners. Human nature and the tendency of owners to ignore dog regulations must be taken into account for a serious policy to work.

Having a clearly demarcated dog area that is fenced off from other areas would protect wildlife and also humans who do not want to be harassed by poorly controlled animals. Such a policy would be easy to enforce because there would be no grey areas which owners could attempt to exploit in their favor.

Correspondence ID: 2884 **Project:** 11759 **Document:** 38106

Received: May,10,2011 15:28:00

Correspondence Type: Web Form

Correspondence: Dear Park Service, I am a dog owner who has been walking Ocean Beach from Taraval to the Cliff House every day for the past 15 years. There are very few problems with dogs on the beach - You have mischaracterized the issue - Ocean Beach is a very harsh environment - there are only a limited number of people and dogs on the beach when I go out there around sunset. Interestingly, when the "snowy plover" season has its 6 week window of not appearing - there are not any more dogs or people on the beach. Only a few people avail themselves of this wonderful resource - it is by no means overrun or inundated by dogs, even in this period. Check it out yourselves - there is no dog problem on this beach. In addition, I would like to add that you have royally given our wonderful pets a reputation they don't deserve - and they deserve to run this beach in all their glory - and with very little impactment to the shorebirds - just as its human companions. The amount of joy and exuberance that you are denying is very hurtful to our magnificent companions. Please see that major parts of Ocean Beach are still designated as off leash areas - this is nature conservancy at its best. Peter Munks

Correspondence ID: 2885 **Project:** 11759 **Document:** 38106

Received: May,10,2011 15:31:29

Correspondence Type: Web Form

Correspondence: I strongly support the requirement that dogs be on-leash! As an asthmatic with severe allergies to dogs, I have been hospitalized in the past by "friendly" licks on the face by golden retrievers. In avoidance of dogs, I have had to abstain from many parks in San Francisco that allow dogs off-leash. I do support fenced areas for off-leash dogs to romp and play where they will not harm people like myself or small children or sensitive wildlife.

Correspondence 2886 **Project:** 11759 **Document:** 38106

ID:**Received:** May,10,2011 16:08:58**Correspondence** Web Form**Type:**

Correspondence: I am so pleased with the draft dog management plan as it allows places for me to take my family were I don't have to worry about dogs taking over our space, barking, going to the bathroom and otherwise having dog parties. Each time I take a walk in GGNA I am on defense of all the dogs running around and going to the bathroom. It is most intense when dog walkers have a large pack running free and the ratio of owner to pet is 8:1. I think the well planned areas allow for plenty of space for dogs to run free and more importantly allows space for people to enjoy the beautiful natural resources of GGNRA.

I am dissapointed in the SF Board of Supervisors' recent actions and want to thank you for developing such a comprehensive plan. I look forward to the implementation.

SF Resident

Correspondence ID: 2887 **Project:** 11759 **Document:** 38106

ID:**Received:** May,10,2011 16:26:45**Correspondence** Web Form**Type:**

Correspondence: As a life-long San Franciscan, who has extensively walked/run/surfed/pic-nicked at Fort Funston, I strongly oppose the current proposal. The problems associated with dogs off leash are greatly exaggerated. Please don't ruin the enjoyment of using the beach as a place to run and play with a dog when the actual problems associated with dogs off leash can be handled in a less intrusive case-by-case manner. A blanket policy to require leashing pets on a huge open public beach is a bad policy.

Correspondence ID: 2888 **Project:** 11759 **Document:** 38106

ID:**Received:** May,10,2011 17:04:32**Correspondence** Web Form**Type:**

Correspondence: Comments following are from Brad Meyer, Skateboarding dog walker, and specifically related to current issues and proposed changes to the Crissy Field section of the Presidio (Area A & B) & the full length of Ocean Beach (from the Cliff house to Ft. Funston)

In general, I believe that the vast majority if not all of bay area would like to observe their fellow citizens; whether they be dog owners, dog walkers, families, young adults, bikers, roller-bladers, nature lovers, seniors, and so

forth conducting themselves under the guise of strict urban etiquette. However, as people become far more self absorbed & entitled, it seems far easier to forgo common courtesy, consideration, & mutual respect when out and about in public. The Bay area seems blessed with a thriving culture spanning the entire economic spectrum and yet I feel that the concentration of affluence & intelligence can also play a huge role in those who feel they are not accountable to their fellow citizens or parks. To this point, if it is made easier for people to know what guidelines exist vis-a-vis park regulations, it should be easier for those who do not comply to the rules to be less complacent.

Therefore, regardless of what actions and changes are made, There should be several large signs placed with clear "magic" language stating usage guidelines at all GGNRA park locations. Specifically, at the highly populated multi-use areas, there could also be a "you are here" map & some directionals as to access to the spot's treasures. (ex. @ Crissy across from Stillwell parking lot there could be a sign directing bikers to bridge explaining they could go either left at the stop sign or continue along field and use driveway @ the tree line. that sign could be as simple as an arrow with bike and a picture of the bridge.) The wider point, and with regard to dog owners, is that there are currently no specific signs dictating off-leash guidelines. There could be a sign developed explaining that owners may only have dogs off-leash in a controlled manner and that this means the dog(s) must be under perfect voice command. The same sign could detail poop pick-up, no digging in the grass, steering packs or singular dogs away from young children, not letting dogs chase birds, that dogs must be leashed on sidewalks, specific dog-walker restrictions (# of dogs total, # of dogs off-leash),and any other prudent measure specifically related to that locale.

Training and empowering the existing Park Rangers with the knowledge and ability to enforce these regulations could also prove beneficial to engendering stability between the various users and habitat of the area. Without a regular foot patrol of Rangers engaging the the private dog owners and dog walker community, For years at Crissy, I have taken

Pursuant to Crissy Field:

Access & Safety Measures: 1. repaint crosswalks & include reflective yield to pedestrian / dogs signs for existing Mason Street crosswalks 2. Create two new crosswalks on Mason with reflective signs at mid-point of Crissy across from maintenance buildings & between parking lot on backside of Sports Basement and path at the western edge of the estuary Crissy field eastern edge * With so many commuters using Mason to access the bridge & all the dust from the construction, it has become hard & sometimes dangerous crossing the street to access the field.

3. Re-seal & Re-paint paved path along mason. It seems challenging for many of the tourists to understand where they should be biking on the path. Also, many a family walk side by side across this path daily. I have personally seen on many accounts regular bikers get pretty upset by the ensuing traffic jam. Also along paved path, there could be biker/walker/blader/stroller/ guidelines on signs. I do believe that all dogs on the paved path should be leashed. It is far easier for an oncoming biker to navigate around a dog on a fixed leash.

4. More plastic bag holders for dog poop. Perhaps at every trash can a box containing bags for dog poop should be located. These spots would also be great for dog owner use guidelines.

5. Create a "warning track" between paved path on mason & Crissy field grass. If there was a 10 ft gravel track between the paved path and the field there could be 2 benefits if a rule was also put into place stating that dogs must be leashed back up before crossing the warning track. Depending on construction, the gravel warning track may also provide great drainage support and open up some space for continued small native plant gardens. The usage guideline signs could also have historical, natural, botanical, info on them indicating what plants, birds, or sights one is observing at each spot.

6. Dog Walker Permitting & enforcement: Please start a program to only allow permitted dog walkers to use the Presidio. i.e. anyone with more than 3 dogs (regardless of whether their dogs are off leash or not) should have a dog walking permit in the future. Having been working with dogs professionally now for the last ten years and using the Crissy field area consistently for the last 7 years, I have gone through the learning curve of determining what techniques work well with dogs and how to behave in a manner conducive to calm assertive control of my dog packs and abiding to the best of my ability to this notion of strict urban etiquette. However, if a trained observer was to take a hard look over the span of a week at Presidio dog-walkers, one would find a vast difference in a handling abilities, manners, and conscious awareness. It should also be known that many regular dog-walkers are rather territorial in their use and with that a sense of entitlement exists where by certain areas of the Presidio are regularly used by the same sets of dog walkers. This has caused several issues in the past. Dog-walkers who walk together forming a huge group of dogs and then chatting it up amongst themselves miss dog poop and behavioral or locational changes in their dogs that may lead to an instance or altercation that could have been avoided. Sometimes one can also see dog walkers with dogs off-leash talking on their mobile phones at length. This behavior could be curbed with signs but also with enforcement. If there was a permitting program along with issuing guidelines as far as the total number of dogs allowed and behavioral guidelines, then we could all have a smoother park

experience. Dog-walkers could then be held accountable for negligent behavior and cited for non-compliance of the guideline rules. The park would then be able to collect fees for permits and for fines. Moreover, a database could be maintained to get a clear picture of the status of all Presidio dog-walkers. Private dog-owners and other park goers would also have an outlet for complaints. It may even be prudent for the permit to be specific to an area of the Presidio. This could avoid over-crowding in areas like the back road between mountain lake park and the golf course or the beach between Crissy field & the Yacht club.

7. Per dogs off-leash numbers and access: a. Please put an 8 dog total limit for dog-walkers into effect. I also support 6 dogs off leash max for two reasons. First, is the poop pick-up factor. It is so easy, and I also see it almost daily, to miss some poop with more than 6 dogs off leash. secondly is the transportation factor. I see far to many pick-up trucks jammed full of precious pooches. This is one of the personal preference and responsibility angles vs, profit potential that many dog-walkers are unabashed about when they sacrifice safety for dollars. Limiting the max-number of dogs will at fist deeply disappoint and possibly infuriate some singular dog-walkers and dog-walking companies, but the larger benefit of safety, park flow, and management will create a more cohesive community where everyone understands expectations and decorum.

b. Please keep current off leash areas as they are in the Presidio with the exception of the section of beach between the pier and the bird sanctuary. I think that this area should not be open to dogs any time of the year. But, I think it unfair to slice Crissy in half as far as dog access and that east of the estuary spit on the beach should also remain off-leash but again with stricter guidelines as to what that means to the public. With less dogs per dog-walker and other dog owners behaving responsibly, there should not be a need to restrict this area. The rolling grassy field at Ft. Mason as well should be an area to be used for restricted off-leash dog use.

8. For Ocean Beach, much of what was said above regarding usage guideline signs applies though it seems a small number of highly irresponsible dog owners frequent this area so specific dog behavior monitoring and enforcement of stated rules would be greatly appreciated by the general public. Especially on the weekends, rule enforcement would be greatly beneficial when the out-of-towners, locals, and tourists converge. Please keep the whole beach open but with temporary on-leash sections during plover nesting periods.

There is more to say as far as how to administer the dog-walker guidelines and permit structure but I'm sure that the GGNRA team have been working towards someting similar.

Please feel free to contact me for further elaboration on any of the above comments. Good luck and thanks for reading this, - Brad Meyer

Correspondence ID: 2889 **Project:** 11759 **Document:** 38106
Received: May,10,2011 17:49:19
Correspondence Type: Web Form
Correspondence: I think it is important to keep areas open for off leash (voice control) pets. As you know, San Francisco is known for its small private yards but large open public spaces. These areas make it possible for simple things like playing fetch with a dog. If these areas are eliminated dog owners would be forced to be creative in where they can let their dogs off leash. This does not seem like a well thought out plan. If there is a legitimate concern about off leash dogs in the community then a better idea would be to gate off these areas so that off leash dogs can roam free without the fear.

Correspondence ID: 2890 **Project:** 11759 **Document:** 38106
Received: May,10,2011 19:58:48
Correspondence Type: Web Form
Correspondence: I am very concerned about the fact that the current boundaries for the off-leash area are not currently being enforced. Young children and older adults should be able to use the area without concern of being attacked or even just knocked over by off-leash dogs. For the elderly, even a small misstep trying to get out of the way of a dog running around can cause a twisted ankle or a broken hip that can impact their lives (and their family's lives) for months if not years or forever.

there is already plenty of space for off-leash dog walking in the area, but there are boundaries and the boundaries should be enforced. Please respect the rights of human beings to enjoy our federal outdoor recreation areas too.

Correspondence ID: 2891 **Project:** 11759 **Document:** 38106
Received: May,10,2011 20:13:07
Correspondence Type: Web Form
Correspondence: I am very concerned that San Francisco has the lowest per capita population of children in the United States and that several policies and practices in the City make it unfriendly to families with children. One problem is the domination of parks and open spaces by dogs. Please remove dogs from our open spaces and parks and make them safe and welcoming for people of all ages. We should not have to worry about dog feces, urine, and pets running wild and terrorizing our children. There is no reason why the City should be

turned over to dogs and families with children should feel forced to move to the suburbs. Children are much more appropriate in the City and people with pets would do their pets justice by moving somewhere with more open space. Just because families with children have less time for political activism doesn't mean that we should be pushed out of the most desirable areas of the City.

Correspondence ID: 2892 **Project:** 11759 **Document:** 38106

Received: May,10,2011 21:13:58

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Building 201, Fort Mason

San Francisco, CA 94123-0022

Re; Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean:

I have been a visitor and volunteer of all the GGNRA parklands for many years, and I am especially enthralled with Rodeo Lagoon. Although I am a proud dog owner, I am writing you to express my strong support of the GGNRA's proposed dog management plan, eliminating and/or restricting dog-walking access on existing and newly-acquired parklands.

Acknowledging there are responsible dog owners that wish to use the parks, this does not negate that the presence of dogs in sensitive habitats such as near faunal breeding habitats, creeks, lagoons, and coastal wetlands of the GGNRA creates an unsafe environment for wildlife and often an unpleasant experience for visitors seeking merely solace and communion with nature. Although much wildlife in busy parks has had to become somewhat habituated to human encroachment (we ourselves are not a good presence for wildlife), even a well-behaved dog presents an olfactory threat that may cause an endemic species to permanently abandon its food or shelter source, but often the harm is much greater than that:

Dog waste contains microbes that are not part of the biota of our naturally-evolved native ecosystems, and this waste enters terrestrial and aquatic life cycles. Dogs can flush out and chase fauna, harm native vegetation, and assist in spreading serious diseases (such as SOD), because most dogs do not maintain all feet on the provided trail at all times. Dogs can cause noise

pollution, run or jump at strangers, and impede forward progress of hikers, runners, bicyclists, and equestrians. These dog behaviors can severely scare nearby wildlife and many types of visitors. Dogs can sometimes "take" wildlife to the point of death.

As a visitor I have seen most of the above incidents occur first hand, and all of them happened with a dog still on a leash! And over time, I have seen the large stands of sand verbena that used to dot much of Rodeo Beach become reduced to a few patches sporadically found by the lagoon. So the idea of voice or sight control provides even less of an assurance of park protection. Witnessing the harm dogs sometimes cause to a park tarnishes one's experience in the wilderness.

This is why the GGNRA should educate the public on the necessity to keep areas dog-free and make it very clear where dogs are not allowed. Further, dog owners should be referred to nearby city, public, and municipal parks that are far less wild and afford the comforts of safety, convenience, dog waste management, and appropriate open space for the exercise of a pet. As a dog owner, these are the kinds of parks I use for my dog, and I leave the sensitive, pristine National Parks for the tranquility of wildlife and human visitors, such as me and my wife.

I completely agree with the GGNRA's current preferred alternative in the DEIS that eliminates off-leash dog walking in many areas within the GGNRA. I am aware that the proposed changes to the existing parks (1979 Pet Policy) and to the new lands in San Mateo County are based upon sound science and long-term monitoring of sensitive park habitats.

I am concerned about the long-term preservation of the GGNRA's native wildlife and want to protect its vitally important ecosystems. So I ask you to please educate visitors, improve dog signage, and move forward with the proposed dog management plan to restrict and/or eliminate dog-walking in GGNRA parklands, wherever your research has deemed it appropriate.

Sincerely,

Roman LoBianco

San Rafael, CA

Correspondence ID: 2893 **Project:** 11759 **Document:** 38106

Received: May,10,2011 23:35:50

Correspondence Type: Web Form

Correspondence: I have read in detail the Plan as it applies to areas within the city/county of

San Francisco.

I am strongly in favor of the proposed Plan as currently posited.

For many years, we walked our dog regularly at Crissy Field and at one time or another at virtually all GGNRA sites that allow dogs. We never had a problem keeping our dog on leash except when other violated the rules. Numerous times, our dog was accosted and sometimes violently challenged by others dogs illegally off leash.

I am also sensitive to the degradation wrecked by off leash dogs, both on wildlife and biologic diversity.

I find that the new plan strikes a measured and equitable balance between the interests of all and the GGNRA versus the self-entitled few opposers.

I encourage the adoption and enforcement of the Plan as published.

Correspondence ID: 2894 **Project:** 11759 **Document:** 38106

Received: May,11,2011 10:58:16

Correspondence Type: Web Form

Correspondence: As an 11-year resident of the Marina District in San Francisco and frequent enthusiast of the GGNRA (as well as board member of regional environmental organization Save the Bay), I want to plead with the NPS to please hold fast to its current recommendations for reforming the dog rules.

In my time in SF, the dog situation seems to have gotten out of hand, particularly in Crissy Field, but also in surprising places like the hiking trails in the Marin Headlands, where I've been scared about getting attacked by off-leash dogs. In addition, while I am aware that lots of residents are lobbying for looser dog regulations (or at least the status quo), I'd like to ask the NPS to please consider (a) what a bad precedent an off-leash policy sets for other national parks (what if people lobby for off-leash rules in, say, Yellowstone, citing GGNRA?); (b) the potentially negative experiences for the many tourists who visit the GGNRA (especially since tourism represents such a big piece of the Bay Area economy and the resulting revenues to local governments); and (c) the value of protecting shorebirds (including, but not only, the Western Snowy Plover: dog owners, in my experience, seem to be ignoring the signage in Crissy Field, with seemingly little fear of enforcement), plants and wetlands (especially since the restoration took so much time, effort, and money), and marine mammals (it seems like I've spotted fewer and fewer sea lions off Crissy Field as the number of off-leash dogs has increased).

The national parks are a real treasure for our country, and I appreciate the NPS's thorough consideration of the most appropriate policy, regardless of any short-term complaints by a small group of people.

Correspondence ID: 2895 **Project:** 11759 **Document:** 38106
Received: May,11,2011 14:25:49
Correspondence Type: Web Form
Correspondence: Dear Sirs:

I frequently visit the Sweeney Ridge Trail within the Sweeney Ridge/Cattle Hill Area and strongly encourage No action or Alternative E. I find the preferred alternative unacceptable and it would eliminate my ability to use the area. The preferred alternative will only allow on leash access on the Pacific side in a very small section of trail. Not worth the extra miles to drive around.

It is hard for me to believe that a leashed dog on a paved road could have such a negative impact on the environment. I thought the need for open recreational space would surely be more important than closing the whole area because of occasional dog leash violators. I truly enjoy Sweeney Ridge Trail and eliminating my access to myself and my dog violates the very principal of your mission. If preserving the natural resources of the area is the top priority, then perhaps no one should have access.

Your preferred alternative is too extreme and would only server the purpose of a very small minority. This trail is a paved road that has been ripped into the hill, the vegetation has been highly altered around it. A couple of leashed dogs a day is the least of it's challenges.

Neal Panken

Correspondence ID: 2896 **Project:** 11759 **Document:** 38106
Received: May,11,2011 15:08:10
Correspondence Type: Web Form
Correspondence: Dear Sirs:

Almost every weekend myself and my dog will head to one of the off leash area in the San Francisco Bay Area. I am very upset after reading the GGNRA DEIS Dog Plan. The authors seem out of touch with the recreational needs of urban dwellers.

The GGNRA is located in the densely populated San Francisco Bay Area. It

is in a major urban area. Much of the land was highly modified by the military when they controlled the land before the GGNRA was created. The GGNRA contains numerous missile silos, artillery batteries, highways and roads. The military planted huge amounts of ice plant to stabilize the sand dunes at Fort Funston and elsewhere. Standards of management that treat much of the GGNRA, especially those parts in San Francisco, like pristine wilderness are misguided and will satisfy a small minority. I and tens of thousands of other dog owners will be effected every day.

Closing the few off-leash areas will put more pressure on the County resources. The will further degrade my enjoyment of my recreational areas. The DEIS does not address this issue at all.

Hypothetical impacts of dog use should not be the reason for restricted dog access. There is no data in the DEIS that shows scientific proof of dog access impacts on the GGNRA wildlife. Birds fly away when disturbed by people, shouldn't we then restrict people from the same area? Why is there a compromise to allow people, but somehow dogs tip the balance?

What if the GGNRA suggested knocking down Doyle drive to save the Coyotes? Why was an expansive walking path built in Crissy field? This is because it is recognized that GGNRA is in an urban area, the landscape has already been highly altered, and proposals to preserve the land as if it was an alpine meadow are not appropriate.

Thanks

Correspondence ID: 2897 **Project:** 11759 **Document:** 38106
Received: May,11,2011 00:00:00
Correspondence Type: Web Form
Correspondence: RE: Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean:

I am writing as a concerned citizen regarding the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area. I use and enjoy the GGNRA lands and am concerned about impacts from dog-related recreation on the wildlife, habitats and other park users at the park.

I strongly encourage you to improve the plan by implementing the following steps:

1. All "Regulated Off-leash Areas" should be fenced, at least in areas where

fences do not pose risks to wildlife and habitats. Fences provide more security for all park users and create clearer boundaries so that dog owners are aware of how to comply with park rules.

2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance.

3. Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it.

4. At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs.

5. While dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.

Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measures to protect the National Park's valuable resources for everyone and for future generations.

Sincerely,

Daisy Chin

Correspondence ID: 2898 **Project:** 11759 **Document:** 38106

Received: May,11,2011 16:39:10

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2899 **Project:** 11759 **Document:** 38106

Received: May,11,2011 18:02:35

Correspondence Type: Web Form

Correspondence: Dear Golden Gate National Park;

After much thought, I am submitting my comments regarding the new restrictions on dogs in the Park.

I am a dog owner and do use the Park for recreation both with and without my dog.

As I understand it, there are several key factors in the decision of the Park Service to restrict dogs:

1. **DEMOGRAPHICS OF DOGS AND THE BAY AREA:** Though it is impossible to do a census of dogs in the Bay Area, it is well known that it is a high number. Dogs are here to stay, and there are probably more living with their human companions here every day. Dogs and humans belong together, and we have become much more sophisticated as owners each year. We clean up after our dogs, we recognize their value in the family and social structure of our towns. We see the value of using dogs for therapy, search and rescue, and we are bound by heartfelt love of our dogs! Dog guardianship in the Bay Area is quite high and is evidenced by the large number of well funded rescue organizations and Humane Societies in the area. The quality of life in the Bay Area is enhanced by dog ownership, and the availability of open lands on which we can enjoy life with a dog is a treasure to most all dog guardians in the Bay Area. It is one of the most compelling reasons that I moved here. Currently the VAST majority of the Park is open to the public but closed to dogs either on or off leash in those areas. The areas open to dogs off leash represent a VERY SMALL fraction of the public lands. It is this small fraction that seems to be the issue.

2. **DAMAGE TO THE PARK LANDS:** Dogs are not responsible for the degradation of the park, nor its trails. The vast majority of damage is from humans. Soil compaction, waste, wildlife disturbances and resources are affected by people way more than by dogs. In reality, dogs are less of a

problem that the horses that are allowed on trails, the bicycles, and even by the Park Service vehicles on the fire roads! Even children who run around, up and down trails, off the trails, up and down the dunes and cliffs cause much more erosion and compaction than dogs! Dogs with their soft feet do less damage than ANY other form of impact! Based on the impact report provided by the Park Service, my proposal is that children be leashed, or barred from the majority of Parklands, and that horses, bicycles, and Park Service vehicles all be banned based on ecological damage caused to the Park.

3. PURPOSE OF PUBLIC LANDS: Since the purpose of GGNRA is to offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic, and recreational values, it seems counter to deny access to those who enjoy the public lands while exercising and enjoying the Park with their dogs. Diversity includes all people and it includes dog owners as well. It is appropriate to close certain areas to dogs, such as Historic Buildings, but as far as recreation is concerned, what could be better for the urban population that a walk on the already compacted trails with a dog?

4. VISITOR EXPERIENCE AND SAFETY: Dogs CREATE safety! It is much safer for me to walk the trails with my dog than alone! And it enhances the experience I have in the Park! Regarding dog bites, an article by Linda Shore, Ed.D citing the GGNRA data on dog bites shows that off leash activity is actually very safe in the Parks. She indicates that falls, drowning, bicycle accidents, horseback riding accidents and vehicle accidents are much more common than dog bites. She also cites data that most dog bites are within the family or friends of the family that owns the dog. Furthermore she indicates that the GGNRA NPS web site in 2002 indicates that there is a greater chance of being struck by lightning than to be bitten by a stranger's dog! Here is part of her report from YOUR web site: "According to the GGNRA (GGNRA NPS Web Site, Park Facts, 2002), the parks had 13,994,614 "recreational visits" during FY 2001. Therefore, given there were 38 bites to bystanders in about 42,000,000 recreational visits to the GGNRA in the 3-year period , we can estimate the chance that a dog will bite a stranger at 1 in 1.1 million visits. (Compare this to the risk of being struck by lightning in the US ? which is 1 in 250,000). A summary of the risk of being bitten by a dog in the GGNRA is given in Table 3. Table 3: Risk of Dog Bite in the GGNRA Type of Bite Risk* Dog on Dog: 1 in 8,400,000 Dog on Owner or Friend: 1 in 1,105,263 Dog on Stranger: 1 in 1,135,135 * Based on GGNRA incident reports from 1999 to 2001 and 13,944,614 visits to the GGNRA per year

So, that's a one in a million, one hundred thousand chance of being bitten by a dog in the Park! But the rate of drowning is a lot higher and we are still allowed to swim! And you can't protect us from falling off the cliffs, or

being hit by a mountain biker, or getting caught in a storm, or being in a car accident while driving in the Park.

5. IT JUST DOES NOT MAKE LOGICAL SENSE! The Park Service has spent HUNDREDS of hours and a HUGE amount of taxpayer money on this project. And for what? Dogs don't hurt the Park as much as kids or people, dogs don't cause a safety risk as much as lightning, dogs add to the pleasure and the use of the Parks by the taxpayers who actually own the Parks, so why ban them? Why make a mess of what seems to be working quite well? In fact, by all rights, there should be MORE off leash areas, not fewer!

I PROPOSE THAT ADDITIONAL AREAS BE OPEN TO OFF LEASH RECREATION BASED ON THE EVIDENCE PROVIDED BY ALL THE SOURCES I HAVE FOUND. EITHER LEAVE THE CURRENT RULES ALONE OR BE REASONABLE AND ADD MORE AREAS FOR THOSE OF US WHO LOVE THE PARK AND OUR DOGS, AND USE THE PARK AS RECREATION!

Dr. Deirdre Kidder

Correspondence ID: 2900 **Project:** 11759 **Document:** 38106

Received: May,11,2011 19:26:34

Correspondence Type: Web Form

Correspondence: We strongly object to the ban of off-leash recreation for dogs on any portion of Ocean Beach. We have lived across the street from Ocean Beach for over 30 years and feel like we have a significant stake in the outcome of the proposed changes. We are and have been members of Audubon, as well as the Golden Gate National Parks Conservancy, for many years and care very much for the welfare and continuation of wildlife like the Western Snowy Plover. However, we don't believe that the proposed changes as outlined in the Draft Dog Management Plan will significantly improve the habitat of the WSP and do believe the proposed plan, if enacted, will have a detrimental effect on the recreation and enjoyment not only for those of us who have dogs but also for those who appreciate a place where people and dogs can coexist. In our experience, Ocean Beach has always been about dogs and people. It's a recreation area and to ban dogs on the beach between Stairwell 21 and Sloat Boulevard feels particularly draconian. Instead of making significant changes to the current regulations it would be more appropriate to enforce those that do exist. The vast majority of those who live near Ocean Beach value it as a resource to be cherished. We help maintain it with periodic beach clean ups and by encouraging responsible use of that very special place. Dogs contribute to the pleasure and ambiance of the beach.

We also feel that Fort Funston is a wonderful resource for dogs and dog

lovers alike. We are continuously amazed at how well dogs of all types, shapes and sizes get along unleashed. It is our feeling that the pathway and coastal trails should be off leash areas as they are now.

Thank you for taking our wishes and comments seriously. It is a very important matter to us.

Correspondence ID: 2901 **Project:** 11759 **Document:** 38106
Received: May,11,2011 19:33:36
Correspondence Type: Web Form
Correspondence: I agree with what my wife said.

We strongly object to the ban of off-leash recreation for dogs on any portion of Ocean Beach. We have lived across the street from Ocean Beach for over 30 years and feel like we have a significant stake in the outcome of the proposed changes. We are and have been members of Audubon, as well as the Golden Gate National Parks Conservancy, for many years and care very much for the welfare and continuation of wildlife like the Western Snowy Plover. However, we don't believe that the proposed changes as outlined in the Draft Dog Management Plan will significantly improve the habitat of the WSP and do believe the proposed plan, if enacted, will have a detrimental effect on the recreation and enjoyment not only for those of us who have dogs but also for those who appreciate a place where people and dogs can coexist. In our experience, Ocean Beach has always been about dogs and people. It's a recreation area and to ban dogs on the beach between Stairwell 21 and Sloat Boulevard feels particularly draconian. Instead of making significant changes to the current regulations it would be more appropriate to enforce those that do exist. The vast majority of those who live near Ocean Beach value it as a resource to be cherished. We help maintain it with periodic beach clean ups and by encouraging responsible use of that very special place. Dogs contribute to the pleasure and ambiance of the beach. We also feel that Fort Funston is a wonderful resource for dogs and dog lovers alike. We are continuously amazed at how well dogs of all types, shapes and sizes get along unleashed. It is our feeling that the pathway and coastal trails should be off leash areas as they are now. Thank you for taking our wishes and comments seriously. It is a very important matter to us. I also believe that the 2% of the people that cause the problems should make the other 98% suffer because of new rules and regulations when the old ones aren't enforced.

Correspondence ID: 2902 **Project:** 11759 **Document:** 38106
Received: May,11,2011 20:42:02
Correspondence: Web Form

Type:

Correspondence: I want to strongly support the proposed GGNRA Dog Management Policy. The current situation on our federal shore lands is one where many off-leash dogs interfere with the wildlife and degrade the natural habitat. Additionally, the unruly behavior of some dogs combined with the inattention of their owners has created a situation where people that are physically challenged or in some way find themselves at a disadvantage, do not feel safe and secure enough to visit these federal lands. We all deserve access to these federal parklands. That is their intended purpose.

We love our pets, but there is a difference between our personal choices, and creatures that live in the wild, dependent upon the environment for survival.

I hope that, in addition to adopting the policy, there will be a strong attempt for actual compliance to an even greater degree than 75%. Park Services need to aim for high compliance every day, in order to change the habits formed by lack of enforcement in the past. Education alone has not worked.

I think the easiest, most practical way for optimum enforcement would call for clearly marked or fenced areas for off-leash dogs. This would indicate that beyond those boundaries, there is a secure area for human recreation and that wildlife will go unstressed.

Unfortunately, our municipal leaders have not, for many years, taken a strong stance with regard to controlling dogs in our green spaces. A certain number of pro-dog groups have used this to expect dogs off-leash everywhere. With the Dog Management Policy, GGNRA finds itself in a difficult place. However, although we may not act out or showcase our views at public meetings, many of us are firmly behind this new policy.

Correspondence ID: 2903 **Project:** 11759 **Document:** 38106
Received: May,11,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please institute the necessary policy direction to ensure that Golden Gate National Park is kept whole and alive for generations to come.

Correspondence ID: 2904 **Project:** 11759 **Document:** 38106
Received: May,11,2011 22:45:34
Correspondence Type: Web Form
Correspondence: I urge you to reject the "preferred alternative. I do not presently have a dog, but join with my dog-walking friends in the GGNRA often. It is important to me that we retain RECREATIONAL spaces for dogs and people. People

who live in urban areas need places where we can be outside. As a disabled person, having the opportunity to walk a dog in a park with a good path provides me with needed recreational opportunities.

The proposed plan violates the mandate for the " maintenance of needed recreational open space" contained in the legislation that created the GGNRA.

I have been living in the Bay Area for over 30 years now, and it seems that we continue to try to convince GGNRA that this is OUR home, and we have a right to enjoy it, including the beautiful ocean. The high-handed attitude of GGRNA makes me question why we even support public lands -- clearly the public gets no control over them.

GGNRA has been opposing the presence of dogs in lands under its control for decades, and yet, where we have walked our dogs off-leash, we don't have the dire consequences that the proposal predicts. It is not acceptable to provide smaller and smaller areas for off-leash use.

GGNRA should abandon the principle of "collective punishment" in your statement that you will reduce or eliminate dog areas if people don't comply with your rules. Give me a break -- the vast majority of dogs and their people are well-behaved. People clean up after their dogs, people clean up after other people's dogs.

Perhaps it is time to take back the land from GGNRA and put it under local control.

Correspondence ID: 2905 **Project:** 11759 **Document:** 38106
Received: May,12,2011 08:36:13
Correspondence Type: Web Form
Correspondence: To: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

From: Mark W. Eaton San Francisco, CA, 94122

Dear Superintendent Dean,

I write in support of adopting a Dog Management Plan for the GGNRA.

My interests in the GGNRA are as a San Francisco resident, a frequent park visitor and a volunteer participating in wildlife monitoring and stewardship activities. I enjoy the park for the unique opportunities to experience the natural and cultural resources and I appreciate the values of our National

Park System.

I concur with the assessment that the natural and cultural resources and park visitor experiences have been, and continue to be, negatively impacted by the presence of substantial quantities of domestic dogs, both on-leash and off-leash, within the GGNRA. On many occasions my own park experiences have been negatively affected by the presence of dogs. I have had personal conflicts with dogs and their owners/guardians as well as being witness to conflicts between dogs and wildlife.

While I am supportive of many aspects of the Preferred Alternative, I have the following comments to offer:

General Comments

Commercial dog walking should not be allowed. Commercial dog walking does not relate to the purpose and mission of the National Parks.

Commercial dog walking provides no service or benefit to park users, has negative impacts on park resources and park visitors, and serves only for the capital gain of private enterprises at the expense of the American public.

Commercial dog walking will require additional annual expenditures for administering and overseeing a permitting process, additional law enforcement, additional resource maintenance and additional public relations.

The DEIS estimates that over 1000 dogs will be commercially walked within the GGNRA daily (p. 63 p. 276). Commercial dog walkers, with up to six dogs, will negatively impact the experience of park visitors on trails and in other areas of the park. If permitted, commercial dog walking activity will increase within the GGNRA and will displace park visitors, of all legitimate user groups, from areas of the park. Commercial dog walkers will dominate the ROLAs, displacing other park visitors. Commercial dog walking vehicles will occupy parking spaces resulting in fewer spaces available for park visitors. If allowed, commercial dog walking operations will have a dominant presence in some areas of the park thus affecting the overall character and ambiance of those areas.

Currently, commercial dog walking is not permitted within the GGNRA or any other National Park unit and there is no justifiable reason to do so. The NPS is well within the scope of its management directives to not allow commercial dog walking and I support this position.

Park visitors should be limited to one dog per visitor. On trails, visitors with more than one dog have a wider space requirement and have the potential to impact other park visitors by impeding their progress along the trail. In

ROLAs, it is not practical to allow voice control of more than one dog per person. With few exceptions, dog handlers are not capable of managing more than one off-leash dog at a time.

The proposed compliance percentage of 75% is too low. Given that many hundreds of dogs are walked within the GGNRA daily, a 25% non-compliance tolerance would create a situation where park resources are significantly negatively impacted. The expectation should be that non-compliance is a rare occurrence and the compliance strategy should reflect that in its standard. The standard of compliance should be the same as for any other park rule or law. An acceptable rate of compliance is somewhere near 100%.

A simple and effective reporting system should be established. The dog management plan should include a means by which park visitors can easily and effectively report non-compliant behavior. Park visitors are sometimes reluctant to report observed violations due to the time involved in making the report. A public reporting system should be incorporated into the plan that will be user friendly and workable. Such a system should require only a few moments of time and be an effective documentation of the violation.

The plan does not provide an adequate amount of hiking trails and picnic areas where visitors can enjoy a dog-free, National Park quality experience. Within San Francisco, the plan provides no significant area where park visitors can spend the day hiking and/or picnicking in a dog free environment. A solution to this problem would be to designate all of the coastal bluff areas, from the Golden Gate Bridge to and including Baker Beach, as a dog-free zone.

Sites Specific Comments

Ft. Mason ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Field WPA ? The DEIS indicates that the east boundary fence will be relocated 200 feet eastward at a position 900 feet from the NOAA pier (p. 60). The language of the plan should allow the National Park Service flexibility in determining the exact location of the fence and consideration should be given to the visual penetration effect as well as the geographical conditions of the immediate area.

Under the preferred alternative, off-leash dog activity directly adjacent to the east boundary fence will pose a visual threat that will penetrate into the Wildlife Protection Area, effectively rendering a portion of the eastern WPA as non-viable habitat during daytime use hours. Given this concern, the

fence should be placed a reasonable distance eastward, beyond the actual 900 foot border line, to allow for an adequate buffer zone.

Additionally, the geography of the area of fence placement is somewhat complicated by non-uniform conditions which include a variety of substrates, varying elevations, several lobes of fenced dune habitat areas, and a variety of pedestrian pathways. Consideration should be given to all of these conditions and fence placement should be such that will accommodate ease of pedestrian traffic flow while maintaining adequate protection of the WPA. When installed, the fence should extend to the water at extreme low tide.

Crissy Central Beach ? The Central Beach ROLA should be fenced and gated. Fences at the west and east ends should extend to the water at extreme low tide. Adequate buffer zones (~300ft) should be included beyond the west and east boundary fences to protect the WPA and the lagoon outlet from the influences of excessive dog play activity. Access points from the promenade should be gated. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Crissy East Beach ? Fencing should be installed to protect the lagoon outlet zone. Outlet areas from bodies of water into bays or oceans are of high habitat value. The outlet zone should be included as part of the protected lagoon area and similarly fenced.

Crissy East of the Lagoon ? The Freshwater Swale should be designated on the area maps as a no dog zone.

Crissy Promenade ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Airfield ? The foot paths that cross the airfield are multi-use trails and should be designated as on-leash areas. Allowing off-leash dogs on the airfield trails will lead to user conflicts.

The airfield ROLA should have some type of physical barrier along the boundaries. A physical barrier will clearly define the ROLA area. Clearly defined boundaries will maximize compliance and minimize conflict. Consider a movable barrier that can be set up and taken down as needed. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

The eastern portion of the airfield should be a no-dog area. The Crissy

airfield attracts a wide variety of grassland bird species, including rare vagrants, and is a popular venue for wildlife viewing.

Ft. Point ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Baker Beach ? The Preferred Alternative for Baker Beach is problematic for several reasons. Splitting the beach into leash-only and no-dog areas will lead to confusion, non-compliance, visitor conflict and continued management problems. Furthermore, allowing dogs near the creek outlet, an area often used by shorebirds, will increase the potential for wildlife conflicts. As a means of eliminating these problems and of creating more opportunities for visitors to enjoy dog-free National Park experiences, I suggest designating the entire Baker Beach area as a dog-free zone.

Lands End ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Sutro Heights Park ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Ocean Beach ? I support the Preferred Alternative for Ocean Beach. To improve upon the Preferred Alternative, I suggest using symbolic fencing and adequate signage to delineate the south border of the ROLA. A simple post and cable fence could be placed along the border from the sea wall to the plover sculpture. A well defined border will help to reduce compliance problems and visitor conflict. Additionally, I suggest changing the name "Snowy Plover Protection Area" to "Wildlife Protection Area". A designation of Wildlife Protection Area would be inclusive of all wildlife species that use the beach habitat area.

Ft. Funston ? I support the Preferred Alternative for Ft. Funston. To improve upon the Preferred Alternative, I suggest installing a fence, with access gates and adequate signage, along the border of the ROLA north of the main lot. A borderline fence will clearly delineate the boundary of the ROLA and will minimize compliance problems and visitor conflict. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Additionally, I suggest aggressively restoring the coastal scrub habitat throughout Ft. Funston. Plant and animal species, as well as park visitors, have been displaced from Ft. Funston over time as dog play activities have

increased. A proactive effort must be made to bring back the visitors who are interested in proper stewardship of this area of the park.

Correspondence ID: 2906 **Project:** 11759 **Document:** 38106

Received: May,12,2011 09:08:06

Correspondence Type: Web Form

Correspondence: I have been a coastside resident for 25 years. I moved to Moss Beach from Belmont, California because of the open space, specifically the beaches and Montara Mountain and the Rancho Corral de Tierra lands . The coast is a GREAT place to live if you love animals. There is room for people and animals of all kinds.

For the past 7 years I have walked all of Montara Mountain with my dog, on and off leash. I have been a responsible dog owner, cleaning up after my dog, and having common sense as to when to have my dog on and off leash. I believe that if the Rancho Corral de Tierra lands are closed to dog owners then the Coastal residents will lose something very special.

I support Alternative E which states that "New Lands begin as 36 CFR 2.15 (dogs allowed on 6ft leash) and new lands with existing off leash use before acquisition may also be considered for voice and sight control in the future."

I hope that GGNRA takes into consideration that the Rancho Corral de Tierra lands have been used by the public for many years with few if any incidents regarding dogs. Restricting or removing dogs from the Rancho Corral de Tierra lands means that living here along the California Coast of San Mateo County is less because of GGNRA.

Sincerely,

Carl Meister

Correspondence ID: 2907 **Project:** 11759 **Document:** 38106

Received: May,12,2011 09:32:18

Correspondence Type: Web Form

Correspondence: Dogs have been human companions since we evolved as a species. Many thousands of years ago there were only a few thousand humans remaining on earth and the dog was a key member of the clan. Humans relied on dogs to hunt prey and to protect the clan.

Presently the dog serves us in many ways as our affinity with the species has enabled us to rely on them to guide us when we lose our sight; to alert us

when we lose our hearing; to retrieve for us when we lose our ability to walk; to save us when we are trapped under rubble or snow; to protect us when we are threatened by aggression. Why does our federal government ignore the service this wonderful animal provides to us? Indeed, a dog helped us to kill the most dangerous man on the planet- Osama bin Laden. A service dog accompanied Seal Team 6 and guided the team into bin Laden's lair.

The beach is every dog's favorite play area. They are always on their best behavior as it is an environment without territorial threat- all scents are washed away by the sea and absorbed into the sand. Any dog owner will tell you that their dog is playful and happy on the beach, not aggressive or out of control. Do we have to treat this special pet as a pest? Indeed, dogs are a part of what makes us human. Certainly they have earned the pleasure- after thousands of years of service- to romp unfettered on the beach.

Correspondence ID: 2908 **Project:** 11759 **Document:** 38106

Received: May,12,2011 09:40:46

Correspondence Type: Web Form

Correspondence: Please don't be influenced by an extreme "dog friendly" city. I don't dislike dogs, but I do believe they should be on leashes in some areas and not allowed in some areas. I have seen people ignore their off-leash dogs at Crissy Field, allowing them to defecate in the plants and not noticing how they might be adversely affecting the natural environment.

I support the GGNRA attempt control dogs in public park areas.

Correspondence ID: 2909 **Project:** 11759 **Document:** 38106

Received: May,12,2011 11:32:06

Correspondence Type: Web Form

Correspondence: To Whom It May Concern,

I urge you to implement a plan that recognizes the safety of urban park users. Dog walkers and the presence of dogs add safety to an urban area like Fort Funston and Ocean Beach during the day and evening when it might not be occupied by other people. When there are dogs and dog walkers present, it encourages other people to use the space recreationally. Empty urban spaces are not inviting and feel less safe.

I realize that there will always be irresponsible pet owners who do not have their animals under voice control or do not pick up after their pets and these people are a danger to and a drain upon public spaces. But in my experience,

the majority of dog walkers are responsible for the animals in their care and do not cause a problem.

I encourage you to think about the public spaces that are connected to urban areas in a manner that is different than spaces that are more remote where the natural areas are not already compromised by urban life.

One suggestion would be to allow more off-leash and under voice control time during the week and off-peak hours in locations like Chrissy Field which are heavily populated during the weekends and at certain points of the day. Looking at how spaces are used throughout the week - which populations are typically present at which times - could be beneficial in determining your policy.

Thank you for your work on this project.

Best regards, Kate Haug

Correspondence ID: 2910 **Project:** 11759 **Document:** 38106
Received: May,12,2011 12:03:27
Correspondence Type: Web Form
Correspondence: Please keep GGNRA open to voice control dogs. Dogs need to exercise and just can not get enough exercise on a leash. I can walk or run with my dog 6-8 miles a day and it is not enough for him. When he is off the leash, he can chase a ball, run around with other dogs (good for socialization), and run circles around me. So if I walk 6-8 miles he is getting at least twice that from running around me. GGNRA voice control areas allow dogs and their owners to exercise together. I understand there are some irresponsible dog owners but please do not let that ruin it for the majority of responsible dog owners. Also, there are so few places that do allow dogs off leash, please do not reduce it more.

Correspondence ID: 2911 **Project:** 11759 **Document:** 38106
Received: May,12,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I have been living in the San Francisco since 2004. I grew up in another great city, New York. I spent my life loving animals from afar as our parents wouldn't allow us to have a dog or cat. Instead, we had fish, birds and a turtle. When I moved out here, I began the search for our dog. We got him in 2009, but before that I volunteered at the SF ACC and played with dogs on Crissy Field, GG Park, Pt Isabel, Ocean Beach. The animals I encountered- both in the shelter and in these areas- continued my love of

dogs. In addition, I love using these areas and was not adversely affected when I went to these areas without a dog and was amongst those with dogs-unleashed or leashed. When we got our dog, we took him to Puppy I and II and are active members in our breeds regional club. I believe we are responsible owners. Our dog is registered in SF County, has all his updated shots and sees the vet once a yr for a check up. I groom him and brush his teeth regularly. We use many of the areas that would be affected by the proposed Dog Management Plan on a daily basis. We use Fort Funston on the weekend and Crissy, Ocean Beach, Land's End, and GG Park during the week. I firmly believe that as much as children and adults love and need playgrounds and areas in a natural setting to play in that dogs need those areas as well. Walking on a leash on cement is not comparable to running on the beach- feeling and smelling the sand, sun, sky, people, ocean. As a woman, an active voter, one of the few minorities in this city, and a member of the Humane Society, I can say that there is room for both birds and dogs. The few fenced in "dog run" areas in GG Park are not nearly enough. I believe that we can compromise and that a solution to share usage of the land can be found. There are not enough trails available for off-leash recreation in the Preferred Alternative. We need more. Not everyone who goes to the GGNRA plays fetch with his or her dog. Many people enjoy hiking on trails with their dogs as their companions. There are not enough trails with off-leash access in the Preferred Alternative. The Preferred Alternative severely restricts recreational access for people with dogs, a fundamental violation of the reason the GGNRA was created. In the legislation that created it, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA. ?There is no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife. Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impacts. This indicates that assumptions about impacts from off-leash dogs must be tested and proven to be true before they can be used to justify restrictions. Unfortunately, most of the assumptions cited by the GGNRA have not been adequately tested or proven. In addition, the GGNRA has repeatedly cited research that they claim shows major impacts from off-leash dogs. However, when the raw data from these studies is analyzed, it is clear the claimed conclusions are not supported by the data. This is highly reminiscent of the problems documented at the Point Reyes National Seashore, where claims by staff biologists about negative impacts from an oyster farm located within the park were proven to be baseless when the raw data was independently analyzed. The DEIS states that it will cost nearly \$1million to enforce the Preferred Alternative, through the hiring

of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs. The DEIS includes a "compliance-based management strategy" that says that, if there is not enough compliance with the restrictions imposed by the Preferred Alternative, the GGNRA will change the management of the various areas to the next more restrictive level ? an offleash area will become on-leash only, an on-leash area will become no dogs at all. This change will be permanent, with no chance to go back to less restrictive levels at any time in the future. This section must be removed from any final Dog Management Plan.

a) This compliance-based management strategy is decidedly unfair, because it can only be changed in one direction ? toward more restrictive levels of access for people with dogs.

b) There is no provision for public comment in the case of a change in status of an off-leash or on-leash area because of the compliance-based management strategy. The GGNRA has already lost two court cases (and one appeal) when it tried to make a significant and controversial policy change without going through a public process. The federal courts have routinely told the GGNRA that they have to hold public meetings and take public comments before making such changes. Clearly, a change in status of an off-leash area to leash-only would be both significant and very controversial, and therefore should require a period of public comment and public hearings before being implemented. The poison pill in the DEIS is an end run designed to allow the GGNRA to make such changes without having to go through a public process (they can claim the public process was the public comment on the DEIS itself, not on the changes it allows at a future time).

c) How will compliance be monitored? Who will do the monitoring? The GGNRA has repeatedly relied on poorly trained volunteers with a deep-seated bias against dogs to monitor the interactions between dogs and snowy plovers. Why would we expect these compliance monitors to be any less biased? Will their claims of non-compliance be valid? Will the GGNRA resort to the use of surveillance cameras to monitor compliance? While noting that there is no mention of surveillance cameras in the DEIS, GGNRA staff have refused to say they would never be used.

d) This allows a few bad actors to result in the removal off-leash access everywhere in the GGNRA, even if there are tens of thousands of hours of incident-free dog walking for every single incident. Including a "nuclear option" in a management plan is not good management policy. Regulations already exist to target those who do not control their dogs when they are off-leash. Target enforcement at those bad actors, not at the huge numbers of dog walkers who do not cause problems. In comments to the SF Animal Control and Welfare Commission on 2/8/07, Jean Donaldson, then head of the Dog Training Program at the SF/SPCA and a nationally recognized author on dog behavior said: "There is not only no evidence that allowing

dogs off-leash for play opportunities increases the incidence of aggression, to a person, every reputable expert in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access decreases the likelihood of aggression." She also said: "Interestingly, it could very well be that the safest dogs are those that attend off-leash dog parks." And she said: "There is no research demonstrating that dog parks or off-leash play contributes to any kind of aggression, including dog-dog aggression." Dogs that are not adequately exercised can develop behavior problems such as barking, destroying property in the home, etc. Behavior problems are one of the primary reasons that people surrender dogs at shelters. San Francisco has a "No Kill" goal that no potentially adoptable animal in a city shelter (SF Animal Care and Control, SF/SPCA, Pets Unlimited). Representatives of the SF/SPCA have said that the Preferred Alternative will make it harder for the SF/SPCA to perform their mission to reduce surrenders to city shelters and make San Francisco a truly No Kill city.

Correspondence ID: 2912 **Project:** 11759 **Document:** 38106

Received: May,12,2011 15:36:37

Correspondence Type: Web Form

Correspondence: I am an "amateur" bird lover and I also like dogs. The Bay Area is undergoing an explosion in the dog population, as pet owners decide to house more and more dogs-often 2 or more in a dwelling. The impact of this explosion is manifesting itself in park redesigns (often leaving for children and adults less room in which to play), lots of feces in park areas that are not cleaned up, lots of unruly dogs not responsive to owners' voice commands, and an impact on wildlife.

I favor strict leash laws at all times on GGNRA lands to protect species that might be harassed by unleashed dogs, most of whom I see do not respond to immediate voice control when meandering in beach and trail areas. Many dogs run so far ahead of their owners that commands cannot be heard (especially with winds muting the sound), so it is unrealistic that most owners can control their dogs unleashed to adequately prevent harassment to the bird populations--or even humans. We have all witnessed owners who think their dogs will respond instantly to voice commands, only to see them have to run over to the dog to pull him off another dog or person (whether it's a menacing situation or not). Unleashed dogs on beaches or large park areas are typically less inclined to respond immediately, as they revel in the wide open freedom and react to tantalizing animal life that coastal areas offer. Most dogs cannot be expected to refrain from their instinctual behavior to explore or chase/attack wildlife. I am also concerned about joggers on beaches and small children who may find unleashed dogs somewhat intimidating

I believe that just to allow dogs on a 6-foot leash in the GGNRA is a worthy compromise itself. If dog owners feel that they must have free rein within public areas, such as the GGNRA because they have nowhere to go for extensive dog exercise, perhaps they should reconsider dog ownership in the first place. I do not mean this in an unkind way. But I feel this dog population explosion trend is steadily getting out of hand when there was, for example, opposition to protection of "naturally-occurring" wildlife, such as the snowy plover--so that dogs could have more recreation areas. Wildlife, such as the snowy plover cannot make other arrangements for its breeding locations and feeding. But domesticated dogs and their owners can.

In general, I urge you restrict dogs to on-leash at all times, at the very least, to maintain a sense of safety for all (including wildlife) those who wish to enjoy the GGNRA. I am also supportive of barring dogs from those areas that NPS has recommended.

Thank you.

Correspondence ID: 2913 **Project:** 11759 **Document:** 38106
Received: May,12,2011 17:24:46
Correspondence Type: Web Form
Correspondence: Even though the Board of Supervisors did not seem to appreciate your carefully thought out plan for the dog/people interaction in our parks, I did. I fully support your efforts.

Correspondence ID: 2914 **Project:** 11759 **Document:** 38106
Received: May,13,2011 00:17:13
Correspondence Type: Web Form
Correspondence: I am very much concerned by the huge increase in the dog population and its impact on the fragile environment in San Francisco and in the the Golden Gate National Recreation Area. Besides it is becoming dangerous to have so many dogs OFF LEASH most of the time and with impunity. It is high noon for the Government to stand firm to protect our environment from so many dogs that roam wherever their masters wish, and to protect the people from dogs that are off leash.

Correspondence ID: 2915 **Project:** 11759 **Document:** 38106
Received: May,13,2011 00:41:10
Correspondence Type: Web Form
Correspondence: I would not like to see regulations changed from the 1979 Pet Policy.

I hike on ocean beach and chrissy field with my dog every week year round, which is one of the big draws for me of living in San Francisco. We are respectful, well behaved, and we clean up after ourselves. The vast majority of other dog owners I encounter are the same. In fact, most days, the only other people we see on the beach are dog owners. I don't understand implementing a plan that would restrict access to the main group of people enjoying the recreation area. Federal regulations are useful, but in this case, the laws that were documented in the 1979 Pet Policy fit the community.

I believe the emphasis should be on issuing citations to the very small percentage of pet owners that allow their pets to be destructive to wildlife or a nuisance to other visitors. A compliance-based management strategy is unfair to respectful dog owners and their well-behaved pets. We would be punished by having our access to the GGNRA increasingly restricted because of the violations of others. In addition, it is likely to create even more confusion about different areas of the park and what level of access is allowed to pets, because it has the potential to change regularly.

Please issue citations for specific infractions of the rules to specific owners/dogs responsible for those infractions according to the 1979 Pet Policy.

Thank you for considering my use of the park in determining how to regulate access.

Cheers, Nicole Sullivan

I heard about this proposal via posted signs on the beach.

Correspondence ID: 2916 **Project:** 11759 **Document:** 38106
Received: May,13,2011 09:31:25
Correspondence Type: Web Form
Correspondence: I am in favor of any regulations that support the safety of park users and protect the surrounding wildlife. Please keep dogs on leashes and restrict their access, so that all can enjoy are beautiful surroundings. Jon Spremich

Correspondence ID: 2917 **Project:** 11759 **Document:** 38106
Received: May,13,2011 11:30:35
Correspondence Type: Web Form
Correspondence: I think it is important to note that the proposed policies to restrict off leash dogs due to the perceived threat to endangered species is only that: a

perception of threat. Is the GGNRA basing this threat to endangered species on scientific data? I have yet to witness any dog harass any of the animals listed by the GGNRA, much less kill or injure one.

Also, why does the NPS and GGNRA ignore the mandate issued by our local Board of Supes who recognize that San Francisco welcomes dogs as loyal companions who are deserving of unfettered exercise on open land? Our city is known as a dog-friendly community and has established a long history of accommodating man's best friend.

San Francisco citizens share responsibility for our natural lands and which are used for enjoyment by all who have come to embrace the San Francisco way- inclusiveness. The GGNRA can impose higher fines for non-compliant dog owners who do not pick up waste or do not have voice command over their dogs.

Where else are dogs to go, who are always happiest when they are able to romp free with their mates and masters but open lands? If the GGNRA seeks to ban access to areas that have been historically available to dog owners, what lands are you replacing them with?

Where is the evidence that supports your conclusion that dogs are creating havoc among visitors and other animals visiting the area? I am convinced that those who complain about dog's off-leash in these areas are a substantial, but vocal, minority. It is shameful that a federal agency is imposing its own biased views and policies against a community that has clearly expressed its desire to enjoy the lands....some previously owned by the community....as it has been historically enjoyed.

Shame on the GGNRA and the NPS for ignoring our historical access and imposing their will against the responsible wishes of the local community.

Correspondence ID: 2918 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: April 7, 2011 Frank Dean, Gen. Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Dear Superintendent Dean,

I am writing in regards to the Draft Dog Management Plan/Environmental Impact Statement. I have lived in the San Francisco Bay area for nearly 30 years. During that time, the population of both humans and their pets have greatly increased. I visit Golden Gate National Recreation Area for hiking

and birdwatching. I have frequently witnessed dogs chasing shorebirds; gulls, and other species. This disturbance is harmful to the birds, and very disruptive to my recreation.

I write in support of Alternative D: Most Protective Based on Resource Protection and Visitor Safety the least environmentally damaging alternative. Frankly, I think that dogs should be eliminated from all of our federal lands. The problem, of course, is not so much the dogs but their owners. I frequently make polite comments that there is a leash law, that I would prefer that a dog, not jump on my clean pants with its muddy paws, or that having their dog lick my binoculars (yes, this has happened) is not conducive with nature observation and birding. I get a polite response only about 25% of the time, and of these responses often there is absolutely no attempt by the dog owner to regulate their dog's behavior. About 25% of the people do not respond at all, and I often get a rude to extremely rude response such as "shut up -- this is none of your business" (Bolin Ridge, GGNRA, March 2010). My response was that it was indeed my business as I was also there to enjoy OUR public lands and that one of the mandates of the National Park Service was to protect wildlife, which the dog in question was most definitely disturbing by running several hundred yards off leash at great speed.

In addition to recreating at GGNRA. I frequently hike on East Bay Regional Park lands. On EBRPD voice control is almost always ineffective. I emphatically urge GGNRA not permit any voice control of dogs as an acceptable alternative. Very few dogs are trained adequately these days to be controlled by voice. The screaming by dog owners attempting to call their dogs is quite disruptive to having a peaceful natural experience. Needless to say, considering allowing voice-control, as proposed under Alternative A. at Ocean Beach in the sensitive Snowy Plover area would be completely irresponsible and provision of habitat for this endangered species.

Allowing up to three dogs per commercial dog walker -- or private dog walker -- is absurd. Again, many impacts to the passive (non-dog) user as well as wildlife.

Not only do I endorse Alternative D, but I urge the Park Service to strictly and consistently enforce dog regulations. Thank you in advance for consideration of my views --

Michael McClaskey Point Reyes Station , CA 94956

Correspondence ID: 2919 **Project:** 11759 **Document:** 38106
Received: May,13,2011 13:22:26

Correspondence Web Form

Type:

Correspondence: To whom it may concern,

Please keep private businesses out of our National Parks by excluding Commercial Dog Walkers from using the GGNRA for business purposes. The large presence of dogs in areas like Fort Funston excluded others from equally using the space and private commercial benefit is not the purpose of the National Park System.

Thank you.

Correspondence ID: 2920 **Project:** 11759 **Document:** 38106

Received: May,13,2011 00:00:00

Correspondence Type: Letter

Correspondence: Frank Dean, GGNRA Superintendent Building 201 Ft. Mason, SF CA 94123-0022

Re: Draft Dog Management Plan / Environmental Impact Statement

Save Our Seashore generally supports GGNRA's preferred Alternatives in Marin County, but we have several comments on the park-wide monitoring program that we believe needs significant strengthening and we have two comments on specific Marin areas that we believe need finer tuning.

COMMENTS RE PARK-WIDE MONITORING PROTOCOLS

In general, we urge that the park-wide GGNRA dog monitoring program be informed and strengthened by the dispute over the Drakes Estero Wilderness at Point Reyes National Seashore (PRNS). At PRNS, the oyster operation in the Estero and/or its supporters, lawyers, lobbyists, publicists, friendly media, and supporting elected officials have asserted that PRNS-monitored wildlife violations have been falsified and also that participating monitors, park scientists and park staff (including staff at the California Coastal Commission) have committed "scientific" or "ethical" fraud.

Thus the oyster company and its supporters have challenged every piece of unfavorable monitoring data while publishing their own (non-peer-reviewed) analyses of draft data that purport to exonerate the oyster operation. The oyster operation and its supporters have also obtained access to draft / non-public documents, either thorough "leaks," or passage from other governmental entities directly to the oyster company, and thus the oyster company and its supporters have been able to adjust their operations or lobbying efforts accordingly.

We urge that GGNRA prepare for such a worst-case scenario, make the peer reviewers fully aware of the PNRS situation, and urge them to propose and GGNRA to adopt measures to fully secure, bullet-proof and materially strengthen the monitoring program. To do otherwise will result in a waste of taxpayer money and will simply prolong a GGNRA dog dispute that has already gone on for almost a decade.

In that regard, we note that the Draft Environmental Impact Study (DEIS) Volume 2, Table 12, page 1568 estimates the cost for a program planned to run 5% years (Per page 1725) to be about \$1.5 Million under any action alternative. Given that DEIS Volume 1, page 66 notes that the proposed monitoring plan will be peer reviewed to insure statistical rigor and accuracy and training of monitoring staff to insure uniform measurement and interpretation of data," then in our opinion, that \$1.5M would appear to be a material under-estimate. Monitoring Team and Protocols

We predict that peer review suggestions to bullet-proof the monitoring program to a level of statistical significance needed make its results stick in court could double the DEIS \$1.5M estimate, given that

1. Monitoring Teams must arrive, work, depart, and remain confidential so as not to bias the data. There must be a method developed that could suggest when the security of any aspect of the Team's work or schedule has been compromised.
2. Several security cameras may be needed in order to provide a means of independently verifying the data and to protect the monitoring team from accusations of fraud.
3. The size of Monitoring Teams must be proportionate to the number of dogs expected to be monitored, otherwise the compliance ratio will be skewed higher (given that violations are more likely to be low-counted than the total). We note that commercial dog walkers are presumed to be able to monitor the activities of at most 6 dogs. Achieving statistical significant results may well require more monitors than are currently estimated.
4. The regulations must be specified much more precisely for monitoring than would be reasonably necessary for law enforcement purposes. We also suggest that several videos carefully vetted to determine the accurate number of violations and dog walkers (and thus compliance ratio) be used to train the Monitoring Team such that each individual's results do not vary excessively from the numbers previously determined to be correct.
5. In addition, we believe that the Monitoring Program should be materially adjusted to measure violations as follows: by Type (not equal weight); by Zone (not area); by Incident (not dogs or dog-walkers) as numerator; by Dog walkers

(not dogs) as denominator; and by Duration (not equal weight), as follows:

Measurement by Type

The 75% over-all compliance threshold is justified when "the benefits in allowing the use is outweighed by the NPS administrative burden required to manage the use." (DEIS Vol 1, pg 67). However, this overall 75% threshold ignores the every-day reality that limited administrative costs are necessarily prioritized as appropriate to the nature of the violation. The potential for more serious violations will necessarily receive more administrative attention and thus should mandate a higher compliance threshold to balance the higher administrative cost. We do not believe, for example, that it is reasonable to assume that an equal amount of administrative cost should be assigned to educating and enforcing a 75% compliance with 36 CFR 2.15 (a) (5) (Pet Excrement) as would be assigned to attaining a 75% compliance with 36 CFR 2.2 (a) (2) (Disturbance of Threatened and Endangered Species). We thus propose weighted violations that defacto prioritize compliance thresholds that average 75% but range from low to high, with Disturbance to Threatened and Endangered Species as the highest priority, and Disturbance and Damage to Wildlife and Vegetation as next highest priority.

An example of weights/thresholds (adapted from Table 4 DEIS-Volume 1 Page 65) TYPE OF VIOLATION WEIGHT THRESHOLD Disturbance to Threatened and Endangered (T&E)Species 4.0 95% Vegetation Damage 2.0 90% Wildlife Disturbance 2.0 90% Violation of Areas Closed to Dogs (T&E and Sensitive Habitat) 1.0 80% Violation of Areas Closed to All (T&E and Sensitive Habitat) 1.0 80% Hazardous Conditions (aggressive behavior, pet rescues)" 1.0 80% Violation of Areas Closed to Dogs (Safety) .75 70% Degree of Compliance with Special Regulation .75 70% Government Property Damage .5 60% Pet Excrement .5 60% Measurement by Zone (Not Area)

Page 66 states that "the number of incidents of non-compliance at any zone must be measured against the total number of dogs in the area during monitoring." For example, as written, an area with 76 dog walkers each with one well-behaved dog in an on-leash zone and 24 dog walkers each with one dog with one incident of harming wildlife in an off-leash zone would achieve a minimum 75% compliance ratio for the combined area (on-leash zone plus off-leash zone). instead, we believe that the compliance ratio should be measured by the number of non-compliance incidents at any zone against the total number of dog-walkers in that zone during monitoring." In this example, the off-leash zone should have a compliance ratio of 0% while the on-leash zone's compliance ratio should be 100%.

Furthermore, in measuring areas, there is a logical flaw if no-dog zones are included. It is certainly possible to measure violation incidents in a no-dog zone, but that number cannot be compared to the uncountable number of dogs that are

not present in that no-dog zone. instead, we propose that dogs observed in an area's no-dog zone be allocated as a violation to the on-leash zone in the same area if the observed violation is on-leash and if the no-dog violation is off-leash, then allocated as a violation to the off-leash zone in the same area.

Measurement by Incident (Not Dogs or Dog Walkers) as Numerator

Page 64 states that the program measures "the percentage of total dogs / dog walkers observed during the previous 12 months not in compliance with the regulations. Page 64's definition does not specify dogs vs. dog walker and thus results could vary by 600% when "total dogs" are used as the numerator vs. "total dog walkers" (each with 6 dogs). In contrast, page 66 states that "the number of incidents of non-compliance at any zone must be measured against the total number of dogs in the area during monitoring. We believe page 66 is correct in using incidents as the numerator (see Example A)

Measurement by Dog Walkers (Not Dogs) as Denominator

Page 66 states that "the number of incidents of non-compliance at any zone must be measured against the total number of dogs in the area during monitoring, We believe page 66 should use the number of dog-walkers (not the number of dogs) as the denominator in the compliance ratio. Dogs do not commit violations; the dog-walker commits the violation by not properly supervising their dog. (See Example A).

Measurement by Dog Walkers Monitored (Not Total Dog walkers) as Denominator

There is a problem if the total dog walkers observed are not fully observed through the visit to assess violations, for example, if there is a careful count of dog-walkers entering a ROLA, but then half of them walk out of sight of the monitors and thus only the visible half are monitored for violation, then the compliance ratio will have its denominator incorrectly inflated by 100%. Similarly if the Monitoring Team counts 100% of the dog-walkers but then is able to carefully monitor only half for possible violations, with the other half monitored for only a few minutes...then the denominator will be again be incorrectly inflated. The correct denominator should be the total number of dog walkers whose actions were monitored for violations over a reasonable period of time.

Measurement by Duration (Not Equal Weight)

The DEIS also does not acknowledge that violations that are not remedied "immediately" have more impact and thus should be weighted more than those that are remedied "immediately"...see:

<http://kron4.net/News/ArticleView/tabid/298/smId/1126/ArticleID/7904/reftab/215/t/Dogs%20Run%20Free>

% 20in% 20Areas% 20that% 20Require% 20Leashes% 20in% 20San% 20Francisco/D
efault.aspx). We believe that violations not corrected immediately and continue for
a duration should have a double weight (See Example B) For example, a wildlife
disturbance that is stopped immediately would have a weight (per adapted Table 4
above) of 2, but when allowed to continue unabated as in the referenced Channel
4 video would have its weight doubled to 4. Examples that Incorporate Suggested
Changes in Monitoring Measurements:

The Monitoring Program begins at 1pm and ends at 4pm, during which time 29
dog walkers (each with 3 dogs) visit an area, all without incident. However, the
30th dog walker allows three violations: first, their dog exhibits aggressive
behavior; second their dog enters a closed area but is noticed immediately and
recalled with an immediate return; third, their dog disturbs wildlife for several
minutes before being noticed and recalled with an immediate return. Example A
shows Monitoring Protocols we do not support.

A) By incident 4.- total dog walkers, the compliance ratio is $90\% = 1 - (3/30)$. By
violating dogs total dogs, the compliance ratio is $98.9\% = 1 - (1/88)$. By violating
dog walkers total dog walkers, the compliance ratio is $96.7\% = 1 - (1/30)$

B) By incidents weighted by type and duration, the aggressive behavior violation
would count as 1.0, the closed area violation would count as 1.0 and wildlife
disturbance violation would count as 2.0 (but would be doubled because it was
not corrected immediately). Thus our suggested Monitoring Protocol would have
a compliance ratio of $80\% = 1 - (6/30)$. Regulations that are Inconsistent or Lack
Necessary Specificity

1. First Bullet's (DEIS pg 62) use of the term "promptly" is inconsistent with
bullet two's use of the term "immediately." We suggest editing the phrase in bullet
one to read: "...meaning that dog walkers must be able to recall their dog
promptly, who shall respond immediately, and shall demonstrate..." and editing
the phrase in bullet two to read, "...when they have demonstrate the ability to
immediately return to their owner/guardian/handler when recalled."

2. Second Bullet's reference to "within the direct eyesight of the
owner/guardian/handler" should be further clarified to make clear that dog
walkers do not have eyes in the back of their heads, thus a violation occurs per se
when the angle between the line running from the leftmost dog to the
owner/guardian/handler and the line running from the rightmost dog to the
owner/guardian/handler exceeds 180 degrees.

3. Third Bullet's reference to "unwanted jumping" is an invitation for dispute.
How can the nature of the jumping be inferred with any certainty by distant
monitoring? Instead the regulation should simply prohibit "jumping" on any park
visitor other than the owner/guardian/handler. When any park visitor wishes to
more closely engage the dog, they should bend or kneel down for closer contact.

Furthermore, aggressive dog behavior (snarling, jumping, and lunging) should be a violation in on-leash areas, as well as ROLAs.

4. Fourth Bullet: (dogs under 4 months must be leashed), Fifth Bullet (Dogs in heat not allowed in ROLAs), and Sixth Bullet (Dogs must be licensed): It should be clear that while these are violations that may not be unequivocally determined by distant monitoring, yet nevertheless, when discovered by Law Enforcement during a monitoring event should count toward as a monitored violation. Also, dogs must be licensed in on-leash areas.

5. Seventh Bullet: dog walkers in ROLAs must have leashes. It should be clarified that the leashes must be functional (i.e. leashes designed to attach to a collar when the dog has no collar are not functional) and that functional leashes must be on the person of the dog walker (i.e. not at home or in the car). Also in an on-leash area, a functional leash attached to the dog but not simultaneously held by the dog walker is a violation.

6. Eighth Bullet: there is an inadvertent omission here, corrected as follows: "Dog walkers must keep dogs on-leash in parking lots and on paths that access ROLAs."

7. Ninth Bullet: There is a lack of specificity...does a dog's nose under an exclusion fence count as a monitored violation of an area closure, or is its one paw, two paws...? We suggest one paw. 8. Tenth Bullet: "Dog walkers must pick up their dogs' feces immediately and dispose of them in a garbage container." It should be clarified that the feces pick-up bag itself is not a "garbage container" and thus it is a violation to leave the "picked up" feces behind in the pick-up bag.

9. Last Bullet (DEIS Volume 1 page 62) and DEIS Volume 2 Exhibit "F" page F-2, #3 (Permit Design): The determination of what is "large easily legible font" on the permit should be from the perspective of the monitoring team to facilitate accurate recording from a distance.

10. Last Bullet (DEIS Volume 1 page 62) and DEIS Volume 2 Exhibit "F" page F-2, #4: (Enforcement / Revocation): "Third offense will result in suspension of commercial dog walkers permit for up to three months." We believe that penalty should apply to the second offence, not the third. Furthermore, regarding the statement that "NPS retains the right to permanently revoke for serious violation" ...we believe that revocation should also be a possibility for repeated violations as well as for serious violations.

11. Appendix "E" lists "General Use Guidelines" (Six Bullets) and then "Requirements" (Five Bullets). We believe these should all be requirements and all should be violations.

COMMENTS ON TWO SPECIFIC MARIN AREAS

Save Our Seashore generally supports GGNRA's Preferred Alternatives in Marin County, but we believe that dog walking opportunities could be better balanced by being less limited at Muir Beach and being more limited at Rodeo yet retaining off-leash opportunities at both areas.

The Muir Beach Preferred Alternative totally eliminates the former off-leash zone and replaces it with an on-leash Pacific Way trail that ends at the parking lot. We suggest instead that Preferred Alternative include the currently-signed NPS on-leash trail that completes a 3/4 mile loop from the parking lot around the Middle Green Gulch trail back to Pacific Way, the Pacific Way Trail and the parking lot. This loop runs on Green Gulch land that by informal agreement with NPS has long allowed emergency vehicles, bikes and dogs, including off-leash. However, we believe this loop was left off the "existing conditions" (Alternative A) because at the time the DEIS was developed, GGNRA had not yet consummated its easement with Green Gulch. Now that the easement is formal, the loop should be shown both as existing and in our opinion as the Preferred Alternative. Including the fire road portions of the loop as a ROLA would be consistent with Marin County Open Space rules that allow off-leash use of Fire Roads and would create a largely off-leash loop that would partially compensate dog walkers for the removal of the public beach as an off-leash area (residents still have "Little Beach" as an option). In our opinion, the topography of the road and the existing farm fences at Green Gulch provide adequate "fencing" and visual notice of an off-leash area.

The Rodeo Beach Preferred Alternative shows a ROLA on virtually of the beach. We do not agree with requiring families with kids and picnic baskets who don't want to deal with dogs to have to trudge to the far end of the beach. We suggest the ROLA should be limited to the half of the beach north of the Bridge as shown as an off-leash zone in Alternative D, using the bridge as a visual "fence" extended with post-and-cable or post-without-cable to more extensively demarcate the off-leash area.

Thank You for the opportunity to comment.

Gordon Bennett, President, Save Our Seashore Former Sierra Club Negotiated Dog Rulemaking participant and GGNRA Parks Commissioner

Correspondence ID: 2921 **Project:** 11759 **Document:** 38106
Received: Mar,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Frank,

We do not know one another but I am writing to comment on the new Dog Leach Policy Plan. Without going into the specifics of the plan too much, I want to say that as much as I do appreciate a love for pets and people, I advance the cause for beleaguered wildlife.

I often walk the walk to the coast accessed by a dirt fire road from the parking lot at Tennessee Valley Road in Mill Valley. I am amazed and thrilled at the wildlife I am fortunate to see there. At close range I saw a large owl seated & blending in with the serpentine rocks, I saw a bobcat pursuing some prey, cat-like, I saw an active nest, of most likely native bees, in a giant tree, I saw a hawk feeding on its prey hidden in the brush, undisturbed by the constant stream of dogless passers-by.

An our later I peeked again to find the hawk still feeding. I chose not to linger and not to disrupt his or her mealtime. I've laid down on the grass on a quieter trail to soak in the rays of our ozone thin winter sun.

As a bit older person, I fear being knocked down by larger playful and careless dogs on a trail and in a park. There are some wonderful parks in our bay area that cater to dogs owners and the welcomed sociability that goes along with that. Some areas need to be set aside and catered to for dogs + dog owners.

As much as possible, at every opportunity, we need to provide safe, protected areas for our wildlife.

While visiting the beach at Fort Cronkite, I informed a family collecting large mussels off the rocks (for their eating, I imagine) that this was not allowed in the park. They stopped harvesting the protected wildlife, but I doubt they understand the implications and effect of their actions and may be inclined to do the same thing again.

Our resources are resilient, but overtaxed. If there is a way that I can be of assistance, as close to home as possible; I live in the Corte Madera, please let me know.

My name is Donna Calimpong. My home phone is and my email address is

I do not encourage a lot of information to be sent to me, but if you want to contact me, I am looking to see where I can be of help to nature, so please do.

Regards and thank you for taking the time to hear my voice.

Donna A. Calimpong

Correspondence ID: 2922 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,29,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Dear Superintendent Dean,

I am writing as a concerned citizen about the above matters. I hike in various parks around the Bay Area and I have the following comments regarding dogs in the parks. They can be detrimental to the basic ecology of the areas and off-leash dogs are frightening to some people. Over-friendly ones sometimes jump up on people knocking them over (especially small people). Specific areas should be clearly signed to accommodate 1) on-leash dogs, 2) off-leash dogs, 3) no dogs. Somehow these limits must be enforced. Why make rules and not follow through?

Certainly commercial dog-walking should not be permitted in the GGNRA as it is illegal according to Park Service rules. If OK, why not allow impromptu lemonade stands along the way? How control? Having to watch out for dogs on the trails makes one less free to enjoy the natural surroundings or to sit for a snack without having a dog coming to sniff!

Please keep working at having something for everyone!

Best regards,

Mildred Bennett

P.S. True, dogs have their place, but not all places are for dogs!

Correspondence ID: 2923 **Project:** 11759 **Document:** 38106

ID:

Received: Apr,08,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: April 5th 2011,

Dear Mr Dean,

I imagine you have received lot of letters from concerned dog owners regarding the "preferred option" on the plan. The prospect of no place to let our dogs off leash, (except for dog parks) feels bleak.

However, I have a perspective to offer rather than a complaint to make a European perspective. In England, (where I come from), and on the

continent, dogs are loved. In many European cities they are allowed in cafe's, restaurants and shops, and across England they are allowed off leash in parks, woods and footpaths. They have space and freedom to play and it is my impression that the dogs are calmer and friendlier as a result.

I believe that society benefits from the smooth co-existence of man and dog, a reminder of our connection to nature. A society that is dog phobic and keeps dogs tethered at almost all times does not seem to be a happy, harmonious place to be, and in my opinion will only increase dog aggression and discord.

As it stands our off leash options currently stand at 1% of GGNRA space. Rather than cut this to nothing./ urge you to amend the plan to provide more off-lead recreation areas for dogs and open new lands to dog walking,

Yours sincerely,

Rachel Gaunt

Correspondence ID: 2924 **Project:** 11759 **Document:** 38106

Received: May,13,2011 14:07:59

Correspondence Type: Web Form

Correspondence: I can only speak to the part of the plan that relates to Ocean Beach as that is my neighborhood. I would have no problem with the current seasonal restrictions if they were enforced and people followed them, but they are not. It is rare to see dogs on leash in the designated area during snowy plover nesting season and most of the dogs running around are not voice controlled and many chase after the birds, I have even witnessed dogs catching snowy plovers and killing them a couple times. Most dog owners either do not see the poor signage and are not aware of the seasonal leash law or intentionally ignore it, and are rude and entitled in their response if you nicely mention the law to them and the reasons for it. I have only twice seen people patrolling the beach informing dog owners they need to have dogs on leash in the year and a half I've lived there, this is obviously not sufficient and dog owners should be fined if they do not comply, otherwise what's the point of having the law at all. Making the on leash area a permanent rather than seasonal law will not help this issue if it is not stringently enforced and better marked. Therefore I would recommend leaving the current seasonal law in place with more active enforcement and signage, including signage posted at all the beach access points along great highway as well as posted along the beach at regular intervals. That is what is needed.

Restrictions on dog walking and off leash areas are not going to be effective

if they are not being enforced and there is no incentive for dog walkers/owners to follow them (or deterrent against breaking them,) this is as true of the current restrictions as it is of potentially more stringent ones. I suspect you will find that increasing many of these restrictions in the GGNRA is not what is needed, what is necessary is enforcement of the existing ones. By disregarding this and only working to pass tougher laws without looking at enforcement issues you risk not only not improving the problem but also pissing off a lot of dog owners.

Thank you for your consideration

Correspondence ID: 2925 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear General Superintendent of Golden Gate Rec. Area,

I visit San Francisco with my dogs twice a year. I am concerned about future limits on dogs suggested in many of the plans. Our family would stop visiting the area if there are more restrictions.

After reviewing the plans I vote for the following.

b. controled by owner: voice control at all time c. voice control-flexible system may choose leash control too much.

Map 3 Alternative A (Homestead Valley) Map 4 (Oakwood Valley Alternative A Map 5 (Muir Beach) Alternative A Map 6 (Rodeo Beach) Alternative A voice control or alternative C with off leash area the same Alternative E more on leash along shore

Map 7 (Marin Headlands) Alternative A Map 8 Fort Baker Alternative s A or C (add off leash area) Map 9 Fort Mason Alternative E Map 10 Crissy Field Alternative A voice control + alt. E larger off leash area. Map 11 Fort Point A, B, C, E, all look the same Not D

Map 12 Baker Beach Alternative A voice control - Large area + Alternative E 1/2 beach off leash

Map 13 (Lands End) this map would not download

Map 15 Ocean Beach Alternative A voice control also free off leash area

Map 16 Fort Funston would not download for review

Map 17 (Mori Point) Alternative A - but why no off-leash Area?

Map 18 (Milagra Ridge) Alternative A

Map 19 Sweeney Ridge Alternative A Pedro Point needs more dog friendly area than any plan offers

I am sure you have spent a lot of time & money to make all of the "Alternative Plans" But us dog owners want more freedom, to have more off leash areas - then the areas would not get over-used because you provided alot of options.

We want to walk our dogs on trails even if in sensitive areas they need to be on a leash.

Margaret Ronan Evanston, IL 60201

Correspondence ID: 2926 **Project:** 11759 **Document:** 38106
Received: May,13,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am an eighty one year old widow and I live in the neighborhood close to the Presidio. I have walked on Crissy Field since 1969. I no longer drive and walking with my dog is one of the few pleasures left to me.

Since the Army left the Presidio, there have been many changes and despite the fact that the Haas Foundation stipulated that off leash dogs would be allocated some 70 acres (I believe it is) for this purpose, this is being totally ignored and ever since there has been an ongoing battle to change this.

There has been for some time an anti dog movement resulting in the situation we now find ourselves, by people who do not understand that dogs are members of the family by those who own + love them.

I do understand the need for an area for families to enjoy without dogs and the East Beach is a logical choice being close to the car park. A number of families combine dogs + children which means they will have to find an alternative.

I do not understand why the Airfield should be reduced to the scale suggested. The Air Field is a swamp inhabited by gophers. Events are rare + should there be one, it surely would not be difficult to keep the public away

temporarily.

Most of the fence protecting the Berm is almost none existent and getting worse. On otherhand the fence separating the West Beach is under constant discussion, should it be back to a few yards or not? I have never seen more than six snowy plovers who are not in leash bit troubled when we walk there with our dogs on leash!

I worry about the constant shrinking of space for dogs. This can only result in more people flocking to Crissy which also is being reduced giving those who only require any excuse to be rid of us all together.

Crissy is a joy to many, its true it can get crowded at peak hours and at week ends, on nice days, but frequently is very quiet-

I find it odd that nothing is ever said about people cycling in the promenade which is no different from a sidewalk- particularly since so many bike lanes have been made available to them.

Sincerely,

Lydia Floyd

Correspondence ID: 2927 **Project:** 11759 **Document:** 38106
Received: Apr,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I have enjoyed Fort Funston for many years - with and now without a dog. I cannot imagine limiting the areas where people can let their dogs go off-leash.

This is an "urban recreation area" intended for the enjoyment of all. It is my very favorite place to walk. Even without my dog, it gives me great pleasure to see and be in contact with people and their dogs.

I cannot understand why the rules there need to change after 40 years of off-leash freedom.

Please reconsider the proposed plan to eliminate the off leash areas.

Put Recreation First!

Conservation and restoration can easily be accomplished in conjunction

with traditional recreational activities.

Thank you for taking the time to read my letter. This issue means a lot to me.

Diane Meagher retired teacher

Correspondence ID: 2928 **Project:** 11759 **Document:** 38106
Received: May,13,2011 15:40:35
Correspondence Type: Web Form
Correspondence: I am a citizen of San Francisco for the last 41years, and a Californian for 63 years. I was gratified with the establishment of the GGNRA and support and utilize the park. Unleashed dogs are particularly destructive of the park and in each of the 21 sites reviewed, I support whole heartedly Alternate D.

Correspondence ID: 2929 **Project:** 11759 **Document:** 38106
Received: May,13,2011 17:50:06
Correspondence Type: Web Form
Correspondence: As this plan addresses national parks everywhere, there is no reason to change the plan just for some highly articulate dog owners in SF. They are not the only ones to use the parks, and I imagine, not a large number of the total. Parks are for human use primarily; accompanying animals are recognized by specific spaces; their humans need to recognize this.

Correspondence ID: 2930 **Project:** 11759 **Document:** 38106
Received: May,13,2011 21:56:57
Correspondence Type: Web Form
Correspondence: I fully support the dog plan and welcome having dogs leashed. I walk many mornings along East and West beach. I love to walk in the sand but it is increasingly difficult with all of the unleashed dogs. These dogs continually approach me and jump on me which I do not appreciate. A large dog jumped on my 3 year old grandson one afternoon and when I asked the owner to call her dog, she unleashed a torrent of foul language. I have tripped over these dogs and been hit on the back of my head with tennis balls that owners are throwing on more than one occasion. Although most owners are responsible for cleaning up the dog poop, not all do. On many days my pleasureable walk is ruined and at times dangerous.

I realize that the more important issue is protection of the natural environment. I hate to see the bird life, other animal life, and ecology

threatened.

Correspondence ID: 2931 **Project:** 11759 **Document:** 38106

Received: May,14,2011 10:28:15

Correspondence Type: Web Form

Correspondence: When trails that were previously opened to dogs get closed, then very often visitors will just make their own new informal trails to avoid the "No Dogs" sign. This effect has been very clear to see at Sweeney Ridge in recent years, for example. There is now a large networks of informal, unsigned, destructive trails where folks happily walk their dogs away from the newly designated "No Dogs" trails.

This is a huge negative environmental impact. In fact it is potentially the biggest environmental impacts of the preferred dog plans in this EIR -- networks on new trails blazed in untouched areas to avoid the restrictions.

Is the NPS ready for this? Seems to me that the EIR is rather pointless since it does not take this huge environmental effect into account. I recommended the EIR be rewritten with this impact taken into serious account. Until then the parks should be left exactly as they are, with enforcement increased as necessary.

Correspondence ID: 2932 **Project:** 11759 **Document:** 38106

Received: May,14,2011 11:52:02

Correspondence Type: Web Form

Correspondence: I urge you to ban dogs from the these parks in order to preserve the natural environment. Also, there are too many dogs off leash despite the rules, and it is a diversion of precious public resource to monitor this. I was walking this morning at Crissy Field and, although signs clearly state that dogs are not allowed off leash until May 15, at least a third of the dogs I saw were off leash.

Correspondence ID: 2933 **Project:** 11759 **Document:** 38106

Received: May,14,2011 12:27:59

Correspondence Type: Web Form

Correspondence: Hello,

I have 2 dogs which I currently take to Fort Funston once or twice a week. I love the fact that there is a place to take my dogs to run, off-leash, that is so

accessible to San Francisco. We all enjoy it.

I, of course, would prefer that all of Fort Funston was available for off-leash dog walking. I respect the off-limits, native vegetation areas, and keep my dogs from running through them. I think that most others do as well, but know that it's not 100 percent.

I realize that people have different needs, and we all need to compromise. That said, we are fortunate in the Bay Area to have many areas where we can go to enjoy a walk in nature, and only a few where dogs can run off-leash. If the off-leash area needs to be restricted, then so be it. However, I feel the currently recommended area is much too small. I'm not sure of the reasoning for such a limited space and would hope for at least 2 to 3 times the area that is currently proposed.

As I said, Fort Funston is a place that both my dogs and I enjoy. Please don't put restrictions in place that will keep this San Franciscan from enjoying this unique bit of the Bay Area.

Thank you, Craig G.

Correspondence ID: 2934 **Project:** 11759 **Document:** 38106

Received: May,14,2011 12:38:41

Correspondence Type: Web Form

Correspondence: I take my dog to Fort Funston weeknights and weekends and want you to continue to allow off-leash dog walking. In all the times we've been there, we've never run into a dog or an owner who wasn't well-behaved. Often there are also people there without dogs and again I've never seen an issue. It's a lovely community of users and a nice opportunity for urban and suburban dogs who don't have yards to get out, put their nose down and run and explore. I know that non-dog people who oppose allowing Fort Funston to remain a canine wonderland will point out that there are a number of dog parks where dogs can be offleash. But the difference between a dog park and Fort Funston is the difference, when I was a kid, between the asphalt playground where they held recess and you had to find someone you felt like playing with or stand alone waiting for it to be over because there was nothing intrinsically free or interesting about the playground and its enforced social scene and the Saturday morning walk through the woods behind the school, discovering fossils in the rocks, and noticing different leaves or flowers, and feeling like I'd had a wonderful adventure without leaving the neighborhood.

Please allow us to keep this place as an off-leash haven.

Correspondence ID: 2935 **Project:** 11759 **Document:** 38106
Received: May,14,2011 13:04:09
Correspondence Type: Web Form
Correspondence: I support the proposed dog plan for the GGNRA Thanks, you, Lee FitzGerald

Correspondence ID: 2936 **Project:** 11759 **Document:** 38106
Received: May,14,2011 13:18:48
Correspondence Type: Web Form
Correspondence: FROM: Patricia Garber, Pacifica, CA. 94044

TO: GGNRA, Park Planning Division

RE: Off-Leash Dog Walking Areas

DATE: March 9, Cabrillo High School Public Meeting

I am writing as a Disabled Senior Citizen who uses the public off-leash dog walking areas to exercise my service dog. I am requesting that you continue the current policies regarding dog use at public parks ? policies that have provided many otherwise unavailable opportunities for seniors and disabled people to use the beautiful, safe facilities..

Fort Funston provides one of the only opportunity for my service dog to get unleashed exercise. Also, like many other disabled seniors, I am able to enjoy being outdoors in our lovely ocean-side parks and to take advantage of the many social interactions we have while dog walking at Fort Funston. Many of the seniors who, like me, use Fort Funston several times a week, have found exercise and friendships along with a profound enjoyment of the outdoors and scenery ? opportunities we would not have without the current policies.

The professional dog walkers have provided me with much needed assistance on many occasions. For example, when I have been unable to exercise my own dog because I was either hospitalized or unable to leave my own house, the professional dog walkers took care of my dog. On days when I have gone to walk my dog, but had difficulty physically navigating the path, the professional dog walkers were always there to give me a hand. I have observed the professional dog walkers frequently encouraging seniors and providing a hand to older disabled people when needed.

There is absolutely no way any disabled senior could manage the steps down to the beach with a leashed dog. Well, there is no way we could

manage the steps without a dog, as the stairs are inaccessible to any of us who have trouble walking. You can take a cane, walker, or wheel chair along the path at Fort Funston, as many of us do, but a walker or wheel chair can not go up and down stairs. I don't know what the ADA requirements are for a public park, but Funston is currently accessible as it is now, and will be completely inaccessible if the plans change as proposed.

I read one comment opposing the current of-leash dog policy in which the writer stated that there was no need for such a policy because dog owners could simply take leashed dogs jogging with them. I think I do not need to point out the obvious ? that many of us simply cannot move as quickly as a running, happily exercising dog.

The parks provide many valuable uses for our community, including uses for the human community. I pick up after my dog, keep her out of fenced areas, and make sure she presents no harm to any wildlife (such as birds). There are many of us seniors who count on the dog parks for our personal recreation. It is safe, healthy, and beautiful. Please do not make Fort Funston inaccessible to me, to others like me, and to responsible dog owners and walkers in our community.

Seniors like myself are often living on restricted incomes, and it is important for our mental and physical health to have an opportunity to safely socialize with a like-minded community. Fort Funston has resources, such as plants and geologic resources, but it is equally important not to ignore the social resources; the human social resource should be of equal value as the geologic resources.

This, however, begs the point that we users of the park are in conflict with the environment peculiarities of the environment (bird safety, care of the dunes, growth opportunities for specialized plants). To argue that we are in conflict is a false assumption, and to conclude that off-leash dog use (and the people to whom the dogs are attached) are a danger to the flora and fauna of the park is a conclusion that is ineluctably drawn from a false premise. We all guard the plant life, we clean up after our animals, we value the wild animal life (i.e. the birds); in the 5 years that I have walked, limped, or rolled on the path at Fort Funston, I have never observed a dog harming a bird. Someone posted a picture of a dog chasing an injured bird by the beach. That is a peculiar and one-time activity ? an activity that neither I nor anyone I have ever asked has seen repeated. Please do not draw a false and harmful conclusion from a one-time, media seeking photo op provided by those who look for ways to cause the GGRNA to change its policy.

Please think of the many seniors and disabled people who happily, safely, and carefully utilize the park opportunity, and continue the current off-leash dog policies that have served many of us so well this past decade.

Correspondence ID: 2937 **Project:** 11759 **Document:** 38106

Received: May,14,2011 16:06:05

Correspondence Type: Web Form

Correspondence: May 14, 2011

TO: GGNRA

Re: Draft Dog Management Plan / Environmental Impact Statement

RE: Baker Beach

To Whom it May Concern

I am a dog guardian who loves to walk with my dog on Baker Beach every weekend. If the Preferred Alternative to the GGNRA DEIS becomes law, I will no longer be able to walk with my dog there.

In the mornings, the beach is full of dog guardians and their dogs and fishermen. We coexist there very nicely. Families with children go to this beach much later in the day than the fishermen and dog people.

Please help me understand what good it will do to have empty beaches in the mornings. The fishermen have learned to live with us dog people for years now. They are not complaining. They are the only other users in the morning.

In the GGNRA Deis, I notice that preliminary surveys and public debates have included suggestions for time-sensitive use by dogs and their guardians (i.e. dogs off-leash allowed until 10:00 a.m. etc). I even suggested this to one of the GGNRA counselors during one of your briefing meetings and she thought it was a great idea. Yet there is no consideration of this idea in the report and I have heard that the GGNRA considers this idea too hard to monitor. Huh? Why would this be hard to monitor?

When I asked why Baker Beach was not considered for off-leash dog play in the Preferred Alternative, I was told that there has to be one beach for people who do not like dogs. Yet, these people are not on the beach in the mornings.

Please modify the preferred alternative to include Baker Beach.

Sincerely,

JoAnne Tybinka Blasko

Correspondence ID: 2938 **Project:** 11759 **Document:** 38106
Received: May,14,2011 16:10:57
Correspondence Type: Web Form
Correspondence: May 14, 2011

GGNRA DEIS RE: Protecting Park Visitors

I am a senior and a resident of San Francisco. I am also a dog guardian.

The GGNRA Deis states that one of the reasons for the proposed restrictions on dogs and their guardians is the need to protect park visitors from dogs.

I don't believe that the available data on dogs in the GGNRA supports the need to protect park visitors from dogs and their guardians. Most citations issued are leash law violations and do not include actual problems with dogs. Does the GGNRA need to be more restrictive than city streets? Isn't it supposed to be a park? And aren't San Francisco residents, 1/3 of whom have dogs, park visitors? We visit the GGNRA daily. We have demonstrated that we are responsible dog guardians.

Further, the claim that the GGNRA has to be managed in a manner similar to the management of other parks like Yellowstone and Yosemite seems inconsistent with the objectives for the GGNRA. At the time the GGNRA was established, off-leash dog walking was acknowledged as one of the traditional recreational uses taking place there.

Perhaps park visitors actually enjoy watching people recreate with their dogs. Many people come up to pet my dog, saying they had to leave theirs behind at home while they are on vacation in San Francisco. These people do not appear to need protection.

Sincerely,

Peter P. Blasko

Correspondence ID: 2939 **Project:** 11759 **Document:** 38106
Received: May,14,2011 16:57:05
Correspondence Type: Web Form
Correspondence: To Whom it may concern,

NOTES ON OCEAN BEACH AND DOGS:

PLEASE STRENGTHEN ALL RULES CONTROLLING DOG BEHAVIOR AT OCEAN BEACH!!! THEY ARE A CONSTANT HAZARD FOR THE BIRDS ATTEMPTING TO FEED AND REST. I AM A DAILY WITNESS AT OCEAN BEACH!

I have lived in the Richmond District in San Francisco since 1960, moving here as a child. I have always been an active user of our beautiful parks and now live five blocks from Ocean Beach. Since we moved here four years ago, to this location near the beach, my husband and I walk daily on or near the Ocean Beach. Frankly, I have been appalled at the overwhelming presence of off-leash dogs and the immense damage that they bring to the bird life. I love watching the birds at the seashore, and yet, these birds almost never get a chance to rest or eat undisturbed. It is so very sad that people are indifferent or completely heedless of the damage that their dogs cause. Just today, while walking, every dog we saw was chasing the birds full time, and in our 45 minute walk we saw absolutely no shoreline birds feeding, the few that we did see were constantly fleeing the dog attacks. (Our walk started at Judah Street and included a large area of on-leash dog territory. The dogs were all unleashed!) I have learned not to speak with the dog walkers as they are completely unreasonable, often very nasty, if you point out the negative effects on the birds. I really love dogs and birds too, but they simply do not mix at all. I know quite a bit about birds, and their presence to me in their natural habitat at the beach is an extremely important part of my health and well-being...not to mention their ability to use the beach being essential to their health and well-being.

ABOVE ALL, DO NOT BELIEVE THE COMPLETE LIES THAT DOG PEOPLE PROMOTE; i.e. THE LIES THAT ONLY A FEW DOGS CHASE THE BIRDS!!! ALMOST ALL OF THE DOGS AT OCEAN BEACH CHASE BIRDS, UNLESS ON A LEASH!!!

NOTES ON SUTRO PARK AND DOGS:

SUTRO PARK IS OVERUSED BY DOGS DAILY AND OFTEN SMELLS LIKE A LARGE STINKING DOG TOILET, ESPECIALLY ON WARMER DAYS!!!

Sutro Park is another dog magnet location. Most dogs here are walked unleashed, but are relatively well behaved. A few are not. A larger problem here is the sheer number of dogs using this park. On warmer days, the entire park smells like a giant dog toilet, as the stench of dog urine and occasionally feces is overwhelming!!!

NOTES ON CHRISSY FIELD AND DOGS:

A few years ago, I took my family out to the beach at Chrissy Field for a picnic. We sat on the Beach sand to be near the soothing sounds of the water. After spreading out a nice repast on the picnic cloth, along come two huge dogs running right across the middle of our food, completely startling my parents and us and ruining our food. I said to the owner "call you dogs", she snapped at me, that this was a dog area and she could do what she wanted. She was very nasty, completely ruining our day. She acted as if she owned the beach and we did not belong there!!

ALL TOO FREQUENTLY, THE DOG OWNERS ACT AS IF THEY OWN THE PARKS AS WELL AND WE ARE INCONSEQUENTIAL INTERLOPERS ON THEIR TERRITORY!!!!

Is there any hope for all of these otherwise decent human dog owners to develop a more sensitive, ecologically in-tune, appropriate behavior for treating our Parks and other nature loving humans correctly? The ratio of dogs to other wildlife is extremely out of balance!

Thank you for your interest,

Linda Fries

Correspondence ID: 2940 **Project:** 11759 **Document:** 38106
Received: May,14,2011 17:03:22
Correspondence Type: Web Form
Correspondence: We have been frequent users of the GGNRA and financial contributors to the Golden Gate National Parks Conservancy since moving back to CA 5 years ago and settling in southern Marin County. We enjoy hiking, trail running, mountain and road biking, and walking our dog on leash through park lands. When we have out of town visitors we often show off our parks with a beautiful drive, a picnic, or by joining a ranger-led walk. We have truly appreciated that GGNRA has kept access to much of its land open to ALL users, including those with dogs. Although we occasionally see an irresponsible dog owner, or a distracted "professional" dog walker with far too many dogs to adequately supervise, we have experienced that the grand majority of people walking dogs on GGNRA land are just like us - tax paying, responsible, local residents who are enjoying our public lands and doing their part to keep the trails clean and safe for all.

It is shocking to us that in some National Parks and other public lands, firearms and "sport" hunting are allowed, yet the GGNRA is considering the exclusion of pet dogs due to a perceived danger to wildlife. We support

seasonal restrictions on dog and human use in areas of the park for breeding of sensitive species, but do find it ludicrous that the proposed "management" plan excludes dogs but continues to allow equestrian use and other hoofstock, with the damage that they cause to trails and other natural areas. We also support restrictions on the number of dogs controlled by any one person on the public lands. However, a complete restriction on dog use is completely unacceptable.

SF and Marin County have a very large dog population, who are accompanied by park users that enjoy the outdoors and in many cases chose to live in this area based on the range of options available for outdoor recreation. If dogs were to be excluded from the GGNRA lands, this would concentrate a large number of dogs and people in an increasingly small area of other local and regional parks that do embrace all types of users. This shift in usage would put an unacceptable strain on those resources, and likely result in more unfortunate dog-dog, dog-wildlife, and dog-human incidents.

Thank you for your consideration of ALL users in planning how to go forward with the GGNRA. We are hopeful that you will continue to embrace the large number of responsible users of park land that sometimes choose to have their dogs accompany them though this local, regional, and national treasure. We would like to continue to be supporters of this park.

Respectfully, Cheri Nielsen

Correspondence ID: 2941 **Project:** 11759 **Document:** 38106

Received: May,14,2011 17:10:44

Correspondence Type: Web Form

Correspondence: I believe that there should be a manageable way for off-leash dog walking of behaved dogs to co-exist with other needs of the GGNRA. From recent news stories on NPR, I feel there is bias against off-leash dog walking by a small but vocal contingent that is overshadowing the entire forum. I feel, by my experiences on my own dog walks of 5-7 times per week rain or shine year round (yes, it is that many and no exaggeration), that most people however are agreeable and amiable to off-leash behaved dogs.

The following are my concerns why barring or limiting off-leash dog walking is unfeasible or unreasonable:

My 1st concern is that most people do not use the areas at all times and therefore there are periods of the day and week off-leash dog walking could be allowed and should not be banned for ALL periods. Currently, I walk my dog several times a week in the GGNRA. I often do this at non-peak times

in the evenings during daylight savings at Land's End and on Friday Morning at Chrissy field. Often times, my dog and I are the only users or of the few users of these places.

My 2nd concern relates to sizes and age of the dog. Are small and/or old well behaved dogs really a threat? Many large dogs and small dogs are not patently threatening-- barely straying from their owners. Again, a blanket ban concerning ALL dogs does not seem logical.

My 3rd concern is that off-leash dogs cannot practically be confined to a relatively few areas. I have not done a scientific study but there seems to be too many dogs in the city to be able to restrict them to limited areas and maintain a safe, happy experience. A dog run is of little fun nor do the dogs seem to actually benefit from them long term due to many limitations. Typically, in my experience, these are places where people with poor dog skills bring their dogs and those dogs instigate trouble. In fact, any off-leash dog aggression I've ever experienced has been at these locations. And confined spaces tend to foment instinctual pack behavior. I have seen this at the dog run at the end of 40th Ave and Fulton in Golden Gate Park. For this reason, I hired a trainer to help me work with recall with my dog so I could walk her off-leash away from the fenced dog run-- something that has become such a joy in my life. I've ever rarely seen any instance, if any, of bad behavior of any other dogs in the general areas. What I am saying is, controlled well behaved off-leash dogs are the norm and it would be unfair to punish owners and dogs that are well behaved. Has anyone done a valid statistical study of visitors on a given day who visited the GGNRA to determine what their experience has been regarding dogs. Is it only the vocal dog-opponents raising the issue? Is this anecdotal or based on evidence and analysis?

As a note for the record, I am in favor of keeping dogs out of sensitive areas but general human population should not be allowed to enter them as well.

In addition, I do believe there are times and places for putting dogs ON leashes. However, I believe this is case by case.

Also, I will say that fenced areas do have their place to allow people to initially train their dogs, however, it should be a goal of all dog owners to graduate to off leash in areas they feel is mutually comfortable and safe for dog, owner, and neighbor and environment alike.

In closing, the real issue is of training, behavior, and tolerance. There are many people I would LIKE to see banned from these places but I relent and co-exist. I feel off-leash well behaved dogs and people can coexist in the GGNRA. Let's help out "man's best friend".

Thanks

Correspondence ID: 2942 **Project:** 11759 **Document:** 38106
Received: May,14,2011 17:43:00
Correspondence Type: Web Form
Correspondence: San Francisco was a common trip for my husband and I when we lived in the Central California area. Golden Gate Park was a planned day of activities because of the man-made and wild/wildlife events. Please protect and value the wild and its natural animals, not dogs and people, for now and in the future.

Correspondence ID: 2943 **Project:** 11759 **Document:** 38106
Received: May,14,2011 17:54:04
Correspondence Type: Web Form
Correspondence: To Whom It May Concern,

As a 14-year resident of San Francisco, and having spent 5 years living at Ocean Beach with my two dogs, I would like to voice my opposition to the preferred alternative, and my support for a no-change policy or a new alternative, which would allow dogs everywhere that is currently off-leash, plus create sufficient off-leash opportunities in San Mateo County. Additionally, a new alternative should remove the compliance-based management strategy.

I appreciate the work of the National Park Service, its efforts to protect the plant, animal, and cultural resources of the GGNRA, and the privilege of living near and recreating in the GGNRA daily with my dogs. I am a responsible dog owner who obeys leash laws, keeps my dogs under control and away from wildlife and sensitive habitats when they are off-leash, and cleans up after them. I believe the preferred alternative would substantially change my quality of life, as well as that of my dogs, by removing social and exercise outlets.

I believe that the preferred alternative violates the mandate for the "maintenance of needed recreational open space" contained in the legislation that created the GGNRA. Not everyone who goes to the GGNRA plays fetch with his or her dog. Many people enjoy hiking on trails with their dogs as their companions. There are not enough trails with off-leash access in the Preferred Alternative. The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with dogs, and contribute to crowding and traffic problems, especially in San Francisco's parks, as more and more people are forced into smaller and

smaller areas.

Additionally, I believe the preferred alternative holds dog owners to a standard of behavior that is impossibly high, and significantly higher than any other park users. For example, studies by GGNRA staff routinely show people without dogs "disturb" snowy plovers, but there is no attempt to restrict people without dogs from the beaches where plovers roost (not nest).

The GGNRA's own studies show that joggers and walkers, not to mention parents with toddlers, equestrians, surfers, and other park users "disturb" plovers, yet there is no attempt to restrict their access in the plover areas. As a frequent bystander in the dunes at Ocean Beach, I routinely observe people without dogs camping, sleeping, walking, and picnicking in plover habitat. Additionally, I have on multiple occasions observed SFPD officers riding dirtbike motorcycles through the dunes and over the length of the beach.

There are much less restrictive measures the GGNRA could take to protect snowy plovers, including the use of temporary "exclosure" fencing when the plovers are present. This would keep everyone, people as well as dogs, out of the area. Enforcement that targets people who intentionally disturb plovers would also help.

Severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. A new alternative should target enforcement on the small number of people whose dogs misbehave, rather than excluding the entire class of people with dogs from most of the GGNRA.

Finally, the level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use of GGNRA resources. The DEIS states that it will cost nearly \$1million to enforce the Preferred Alternative, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could more easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs.

Thank you for considering my comments. Here's to a continued dog-friendly GGNRA.

Correspondence ID: 2944 **Project:** 11759 **Document:** 38106

Received: May,14,2011 19:25:22

Correspondence Type: Web Form

Correspondence: Having recently been set upon by an unleashed dog in the Presidio as I walked by the dog and owner on a paved road, I would like to say that any policy that does not require ALL dogs (whether nice, darling, or just plain mean, untrained, and uncontrolled) to be leashed in the park areas endangers those of us taxpayers who walk on your paths. I now understand why I see people my age (over 65) carrying golf clubs when they are on foot in your precincts and nowhere near a golf course. I certainly wish I had been carrying one when the dog in question decided to assault me. I'm sure you know more than I do about the dog manure issue arising from dog use of the park. But from my observation this is a problem you should address. I live near the Presidio and every day I see the neighbors walking their dogs over there to relieve themselves. Thank you. Harry Miller

Correspondence ID: 2945 **Project:** 11759 **Document:** 38106

Received: May,14,2011 19:30:41

Correspondence Type: Web Form

Correspondence: As a dog owner and walker in San Francisco, I do not want to see more restrictions on off-leash areas in GGNRA. Already 1% of the recreation area is off limits to dogs. To restrict it further would be unfair to dogs AND their owners (tax payers that help fund the GGNRA). Dogs naturally need areas to roam free and run - this promotes a healthy mental state within the animal. By reducing this freedom, canines will be insufficiently exercised and will pose more of a threat to the local community as their stress levels increase. Dogs take stress out on humans and other dogs, which does not present a healthy situation for anyone existing in the bay area.

By restricting more off-leash areas within GGNRA, thousands of dogs and their owners will move to the city parks, which will effectively become destroyed. This is an obvious and hurtful implication of the new restrictions. Everyone has to make compromises in life, so why can't the GGNRA make one to allow dogs in the areas it always has? It is unethical to place this potential burden on the city parks, which hundreds of thousands in San Francisco enjoy.

Please don't restrict off-leash areas in the GGNRA!

Correspondence ID: 2946 **Project:** 11759 **Document:** 38106

Received: May,14,2011 21:04:17

Correspondence Web Form

Type:

Correspondence: I am a senior (AARP card carrying), Asian, single female. I am a native San Franciscan. I do not want you to take away or limit off-leash dog walking at Fort Funston. I tried walking at Fort Funston in the late 70's early 80's but stopped due to the type of people I encountered there. (Lewd behavior directed toward myself a single female just trying to get some outdoor exercise, and groups of young men drinking/smoking-making it quite uncomfortable). Revisiting the area in the late 80's to present time I am so happy that there are people there that proudly use the space. Off-leash dogs have made the area safe for people like me who just want to walk and not worry about crime. Dog people are friendly, conscientious and are always willing to help. The place is no longer isolated-making it a deterrent to those who would use it for unsavory activities (drugs, homeless encampments, etc.). The dogs being off-leash keep people from wanting to sleep in the bushes. The one person who does sleep there leaves before 8am. I feel SAFE walking at Fort Funston. If you limit off-leash dog walking at Fort Funston, you will also see a new problem at the Fort. Feral cats. Cats will come, stay, breed and soon the birds that exist there will be wiped out. Cats hunt and kill birds. Dogs may chase but I have never seen one catch a bird. I have seen cats kill birds and there have been numerous studies showing the negative impact on bird populations by cats. Finally, crime in the neighboring area will increase. The cars parked around the Lake will get broken into. I know most of Marin county's GGNRA do not have off leash dog access and there is no real problem with the above issues but Marin is isolated compared to Fort Funston. It is not easily accessible. There is a bus stop across the street from Fort Funston and it is walking distance from homes, shopping, BART etc. Take the dogs away and crime will come. Take the dogs away and the cats will come. Thank you for your time.

Correspondence ID: 2947 **Project:** 11759 **Document:** 38106

Received: May,15,2011 00:00:00

Correspondence Type: Web Form

Correspondence: For many years I have seen hundreds, if not thousands, of dogs and their owners enjoying Fort Funston as a place for off leash walking. Random incidents of a dog creating a problem will happen, just as it does in the human population but that isn't a strong enough reason to remove areas like this that support the dog/man/family connection that is gained.

We can make places available for off leash enjoyment - please do not take them away.

Terrie weinand

Correspondence ID: 2948 **Project:** 11759 **Document:** 38106

Received: May,15,2011 10:08:45

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2949 **Project:** 11759 **Document:** 38106

Received: May,15,2011 10:48:49

Correspondence Type: Web Form

Correspondence: I'm writing to request that you limit off leash recreation for dogs to areas that will not have negative impacts on indigenous and endangered species. I have personally witnessed, multiple times, off leash dogs chasing migrating shorebirds up and down the beach and effectively preventing them from feeding, and costing them vital energy in fleeing the dogs. The people with these dogs have watched, but done nothing to intervene.

I have friends who are dog owners and some are dog walkers, who strongly oppose any limitation on their recreational activities in the GGNRA. I explain to them that dogs are not indigenous to this area, dogs are not an endangered species and dogs can go elsewhere to run and play. Shorebirds don't have that option. They are indigenous to this area, many are endangered or threatened and they do not have the luxury of feeding or resting in any other area except the tidal zone where their food lives. Some friends can understand, some insist that it's a 'rights' issue and they should be able to run their dogs were they please.

As long as some people cannot understand the necessity of allowing safe spaces for other species who are completely dependent on those few spaces,

restrictions must be made to protect the voiceless from the the species with a very vocal and organized lobby.

I also feel that endangered species wildlife habitat protection should be 95% compliance, not the 75% that is currently outlined.

Thank you for considering my views.

Correspondence ID: 2950 **Project:** 11759 **Document:** 38106
Received: May,15,2011 11:02:36
Correspondence Type: Web Form
Correspondence: Keep the beaches open for dogs off leash. This is nothing more than a ploy for the parks department to get more fine revenue. it accomplishes nothing.

Correspondence ID: 2951 **Project:** 11759 **Document:** 38106
Received: May,15,2011 11:37:13
Correspondence Type: Web Form
Correspondence: To Whom It May Concern,

As a nine year resident of San Francisco, eight years with my dog, I would like to voice my opposition to the preferred alternative, and my support for a no-change policy or a new alternative, which would allow dogs everywhere that is currently off-leash, plus create sufficient off-leash opportunities in San Mateo County. Additionally, a new alternative should remove the compliance-based management strategy.

I appreciate the work of the National Park Service, its efforts to protect the plant, animal, and cultural resources of the GGNRA, and the privilege of living near and recreating in the GGNRA weekly with my dogs. I am a responsible dog owner who obeys leash laws, keeps my dogs under control and away from wildlife and sensitive habitats when they are off-leash, and cleans up after them. I believe the preferred alternative would substantially change my quality of life, as well as that of my dogs, by removing social and exercise outlets.

I believe that the preferred alternative violates the mandate for the "maintenance of needed recreational open space" contained in the legislation that created the GGNRA. Not everyone who goes to the GGNRA plays fetch with his or her dog. Many people enjoy hiking on trails with their dogs as their companions. There are not enough trails with off-leash access in the Preferred Alternative. The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with

dogs, and contribute to crowding and traffic problems, especially in San Francisco's parks, as more and more people are forced into smaller and smaller areas.

Additionally, I believe the preferred alternative holds dog owners to a standard of behavior that is impossibly high, and significantly higher than any other park users. For example, studies by GGNRA staff routinely show people without dogs "disturb" snowy plovers, but there is no attempt to restrict people without dogs from the beaches where plovers roost (not nest).

The GGNRA's own studies show that joggers and walkers, not to mention parents with toddlers, equestrians, surfers, and other park users "disturb" plovers, yet there is no attempt to restrict their access in the plover areas. As a frequent bystander in the dunes at Ocean Beach, I routinely observe people without dogs camping, sleeping, walking, and picnicking in plover habitat. Additionally, I have on multiple occasions observed SFPD officers riding dirtbike motorcycles through the dunes and over the length of the beach.

There are much less restrictive measures the GGNRA could take to protect snowy plovers, including the use of temporary "exclosure" fencing when the plovers are present. This would keep everyone, people as well as dogs, out of the area. Enforcement that targets people who intentionally disturb plovers would also help.

Severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. A new alternative should target enforcement on the small number of people whose dogs misbehave, rather than excluding the entire class of people with dogs from most of the GGNRA.

Finally, the level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use of GGNRA resources. The DEIS states that it will cost nearly \$1million to enforce the Preferred Alternative, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could more easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs.

Thank you for considering my comments. Here's to a continued dog-friendly

GGNRA.

Audrey Stevenson

Correspondence ID: 2952 **Project:** 11759 **Document:** 38106
Received: May,15,2011 00:00:00
Correspondence Type: Web Form
Correspondence: We need space for our pooches!! especially ft. funston, ocean beach and chrissy field. please do the right thing by the people and pooches of SF!

Correspondence ID: 2953 **Project:** 11759 **Document:** 38106
Received: May,15,2011 14:57:12
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 2954 **Project:** 11759 **Document:** 38106
Received: May,15,2011 15:15:21
Correspondence Type: Web Form
Correspondence: Please consider all uses of the Golden Gate Recreational Area. Having separated areas for dogs that are off-leash and other users benefits all. Furthermore, protecting sensitive areas such as the wintering western snowy plovers habitat seems in line with the area's establishment.

Correspondence ID: 2955 **Project:** 11759 **Document:** 38106

Received: May,15,2011 15:21:21

Correspondence Web Form

Type:

Correspondence: I am very supportive of your plan to clearly define dog walking boundaries in the GGNRA. I love dogs. I've just been in Vancouver, B.C., walking dogs with my daughter on their doggie off-leash beach. It is a well contained beach, the dogs are so free and happy and the other beaches are safer for everyone. I used to walk in Fort Funston and have so many happy memories of that area but I never go there any more because of the dogs. I still walk on Ocean beach, but it is the nature of the beach that draws me, the birds and the quiet.

This is the first time I have every made a public comment about dog walking areas because I am hesitant to get in the cross hairs of the "I have a dog and I vote" folks. They are indeed rabid and it seems pretty impossible to have a polite disagreement with them.

Thank you for being firm.

Correspondence ID: 2956 **Project:** 11759 **Document:** 38106

Received: May,15,2011 17:41:51

Correspondence Web Form

Type:

Correspondence: I think there should be even more off leash areas for dogs in the parks, especially around Muir Beach and on Mt Tam. There are far more citizens who walk their dogs in the parks than mountain bikers who are a real danger and have taken over, ruining the serenity and natural environment of the parks. The vast, vast majority of dogs are well behaved and do not bother people or other dogs. Why should we citizens who have dogs be discriminated against? We should have the right to use the parks in the way we enjoy- with our dogs running free. Are dogs not to have any place where they can run and play, be off leash and get the exercise they need? It's extremely uncommon for dogs to disturb the natural environment of the parks. By contrast the mountain bikers are wrecking the roads and creating huge dust storms as well as creating hazards on the trails themselves by taking over the entire trails. They should have controls placed on them- not the dog owners.

People walking in nature with their dogs is natural and healthy. The relationship between dogs and humans goes back over 50,000 years. This is a natural relationship which naturally involves walking and playing in nature. The parks are places where citizens should have the full right to experience the beauty of the parks and open air activities with their dogs. Whatever dog haters there are on your staff should be fired, as they are

really out of touch with what most people want.

If you are so concerned about liability for the very few ill-behaved dogs that may be in the parks, buy insurance. That's what is it for. Or put signs up that warn that any problems created by dogs will be the financial responsibility of the dog owners- who would also obviously be sued by any person victimized by the dog involved. Problems with dogs biting people or harming them are so rare, I would bet there are more assaults by people on people in the parks than assaults by dogs. Does that mean you should ban people from the parks? Or maybe just young males?

Dogs and their owners should have access to parks and the dogs should be allowed off leash. Period.

Correspondence ID: 2957 **Project:** 11759 **Document:** 38106

Received: May,15,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I have lived in San Francisco for 40 years and have had several dogs and have always taken them with me to enjoy the outdoors in our city. The favorite outing has been Crissy Field and Fort Funston, as well as Ocean Beach. In this small congested city, it is crucial to have a place for a dog owner to take a canine friend to run and get fresh air. The GGNRA in the Bay Area is not a destination park like Yosemite or Yellowstone. It is an urban space which must be shared by all who live here as well as the visitors. I plead with you to allow more places for dogs, both leashed and unleashed. Thank you. Marjorie Johansen

Correspondence ID: 2958 **Project:** 11759 **Document:** 38106

Received: May,15,2011 18:54:39

Correspondence Type: Web Form

Correspondence: My name is Deb. I am a 40 something college educated software professional, a home owner, living in Oakland. I accompanied a friend to Muir Beach with her rescue dog the other week and was horrified to learn that this perfect day we were having could soon become extinct.

I am deeply saddened to learn that the GGNRA board is seriously considering this drastic proposal to outlaw dogs in most of the few places people and dogs have left to roam freely here in the Bay Area.

I don't even have a dog myself at this time, but I love dogs and know many close friends who have dogs who depend on these areas for their primary means of recreation and exercise. My happiest days are spent with dogs on

beaches and all over the ggnra.

I've seen the maps of the proposal which show it's ok to have dogs on leash in the parking lot area, which is ludicrous and insulting and far from a reasonable and fair proposal. I don't understand at all why reducing the dog footprint is a goal at all. Personally I think it should be far expanded. Our world would be a better, saner place if dogs were included in more of our activities.

If the idea is to keep some areas where people go to recreate as adults and with children free of dogs, I do understand this need. Some people are allergic or afraid of dogs for various reasons of experience or inexperience or personal preference. However that does not preclude the rights of people with dogs, to enjoy the same areas responsibly.

I know many people, including myself, who don't have children have animal companions who are nothing short of family. To put the ggnra off limits to people with dogs is cruel and biased and insensitive to the quality of life we should be able to enjoy on this beautiful land. I don't buy that dogs are ruining it. I understand that some people with dogs are irresponsible and don't clean up after them or don't train or control them adequately but this is by far, far, far the exception rather than the rule. I know many people including myself that pick up extra waste if we see it because we love this land and want to share it with dogs for ever!

The dog community is a beautiful, essential one in the bay area where many people cannot afford to have children. Walking a dog on leash in urban neighborhoods is not a good life for a dog or the people who have them in their lives.

I think a society should be judged by how it treats its animals and leaving no public space for them to enjoy is very small minded, simplistic, soul-less and controlling. The proposal being considered doesn't take dogs and their families of humans into consideration at all. In my opinion, it is hurtful and mean spirited and undermines one of the most healthy communities in the bay area.

I urge you to use your power on this board for the good of our community which includes having thriving, beautiful places where dogs and humans alike can roam. Dogs are healing, spiritual creatures for the most part and there is no greater joy for many, many, many people than to spend time frolicking in the few open places we have left.

Please listen to the voices of the pro dog people like myself and leave this space open to all who want to enjoy it peacefully and responsibly.

Correspondence ID: 2959 **Project:** 11759 **Document:** 38106

Received: May,15,2011 19:17:26

Correspondence Type: Web Form

Correspondence: I am a responsible dog owner, professional, working in SF and living in Oakland.

I recently became aware of this proposal to seriously limit the use of ggnra parks by dogs off leash.

I'm horrified and can't believe so much effort is going into this proposal which wouldn't be supported by ANYone who has a dog or loves a dog.

Having a dog on leash in these areas are contrary to why people with dogs go there! We're looking for and NEED an outlet from the urban landscape WITH our families which in our cases are our dogs!

I think this proposal is shameful. I've reviewed the statistics and see the majority of citations are for leash infractions. The number of people who've been bitten by a dog are exceedingly FEW ... and while it's unfortunate that some people have dogs who are not controlled, it's not a reason to end this amazing era of dog friendly community we enjoy regularly.

I'm downright disgusted this is even up for consideration and the breadth of this proposal.

Please rethink this policy of exclusion sharing our parks and beaches with dogs is one of the singular joys of my life and so many others.

Correspondence ID: 2960 **Project:** 11759 **Document:** 38106

Received: May,15,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Honestly.... Not all dogs dog-owners cause problems. It takes 10% of the entire population of dog-owners (otherwise known as a minority)...to sully the rest... and who pays the price THE MAJORITY..... Now doesn't that strike you as odd

Correspondence ID: 2961 **Project:** 11759 **Document:** 38106

Received: May,15,2011 22:09:31

Correspondence Type: Web Form

Correspondence: I thoroughly support restrictions on dogs in GGNRA.

I have been a resident of Marin for 19 years and am an avid hiker. While I like dogs and appreciate good dog care, I have seen far too many dog owners allowing their dogs to run off leash in restricted areas. A few months ago, while on a walk on the Miwok trail, nearing the coast trail, I came across a young woman who was a professional dog walker. She had 10 large dogs in her care and all of them were running unleashed right in the midst of a no dog sign! One of the dogs jumped up on me and knocked me down. When I pushed the dog off of me, I went to check it's tag to see if I might be able to alert it's owner. The dog walker became belligerent and threatened to hit me! It was an unpleasant and totally unnessesary encounter. I see this aggresion mounting more and more. Many dog owners insist on letting their dogs off lease and are insulted if a hiker reminds them of rules. I have numerous encounters with dogs on the trail that are unpleasant, sometimes as simple as a muddy dog jumping up on me or 2 dogs suddenly wildly barking at each other. At Rodeo Beach dog owner flock to the beach to let their dogs run free, chasing birds and other wildlife. The owner have with no regard for other people who simply wish to enjoy nature as it is.

These dogs are running wild, tearing up the fragile plant life and hunting for quail and other wildlife. We have a precious resource of wildlife and a natural setting that is getting eroded by domestic pets. Pet owners need to consider responsible care for their environment and not assume that the parks are there for their exclusive use.

I would like to see a NO DOGS ALLOWED rule that is actively enforced. I would even be willing to help out with the enforcement.

thank you.

Correspondence ID: 2962 **Project:** 11759 **Document:** 38106
Received: May,16,2011 04:03:18
Correspondence Type: Web Form
Correspondence: Good morning!

My group has been coming to Fort Funston for the past 6 years. Sometimes we have as few as 5 hounds, but we have had up to 20 at a time. The hounds LOVE running on the beach! They know when we pull onto The Great Highway and anxiously await our arrival!

I understand that not everyone is a dog person, but those of us who go to these off-leash parks are! There are a lot of parks in California, but not many allow your dogs to enter. After looking at the maps for Fort Funston, I would like to exclude plans 16-B and 16-D as these would not allow our

dogs to run and wrestle with each other (you can't wrestle on a leash!)! I prefer any plan that allows the dogs to run as much as possible. In my opinion, those would be 16-A, 16-C and 16-E. We generally go down the sand steps to the beach and follow the beach north to the incline and then follow the paved paths back to the parking lots. By the time we reach the paved areas again, our dogs are tired and are very unlikely to wander off the path. Having to leash them in the paved areas is not necessary for our dogs, but we will do it if we have the beach to run free!

The dogs that go to Fort Funston are all well behaved. I have never seen a fight amongst the dogs or the people in all the years that we have come here! The people that can't trust their dogs off-leash don't take their dogs off. Those of us who work with our dogs, do! Most dogs ignore the other dogs completely, focussing on their balls, or their friends! Big dogs; small dogs and medium sized - they all love coming and walking and running on the beach!

The hounds are exhausted by the time we get back to the parking lot, having the chance to rid themselves of the extra energy they had stored up during the week, and a tired dog is a good dog!!

Please keep the beaches leash-free!

Thank you! Gwenda G. Dossey BABH

Correspondence ID: 2963 **Project:** 11759 **Document:** 38106

Received: May,16,2011 07:20:02

Correspondence Type: Web Form

Correspondence: Appendix J: "Adjacent Dog Walking Areas" is very misleading and is not good support for the EIR.

Firstly, many of the adjacent walking areas listed are Dog Parks. Dog Parks are NOT walking areas! They are normally little more than a few square yards of mud. Generally not suitable for many smaller dogs and absolutely in no way a good alternative to dog walking in open space.

Second: Several the State parks mentioned are now subject to semi-permanent closure.

Third: Several of the listings are incorrect / have changed status / access. For example, Esplanade Beach in Pacifica was once a great resource for off leash dogs. This resource is now completely inaccessible because of coastal erosion. No dog or person has been able to access this beach for years, and this is unlikely to change anytime in the future. The resource basically no

longer exists.

The GGNRA areas are some of the VERY FEW where On and Off leash dogs can be exercised. The enormously restrictive access proposed in the preferred plans would greatly diminish the recreation opportunity of a huge proportion of the local population, particularly in San Mateo county. The proposed changes are far far too restrictive at a time when people have less money to travel, and need free / cheap recreation alternatives. Please please please not not enact the preferred plans!!! Leave access the way it is PLEASE!

Correspondence ID: 2964 **Project:** 11759 **Document:** 38106

Received: May,16,2011 08:30:11

Correspondence Type: Web Form

Correspondence: To Whom It May Concern, I would like to voice my opposition to the preferred alternative, and my support for a no-change policy or a new alternative, which would allow dogs everywhere that is currently off-leash, plus create sufficient off-leash opportunities in San Mateo County. Additionally, a new alternative should remove the compliance-based management strategy.

I appreciate the work of the National Park Service, its efforts to protect the plant, animal, and cultural resources of the GGNRA, and the privilege of living near and recreating in the GGNRA daily with my dog. I am a responsible dog owner who obeys leash laws, keeps my dogs under control and away from wildlife and sensitive habitats when they are off-leash, and cleans up after them. I believe the preferred alternative would substantially change my quality of life, as well as that of my dog, by removing social and exercise outlets.

I believe that the preferred alternative violates the mandate for the "maintenance of needed recreational open space" contained in the legislation that created the GGNRA. Not everyone who goes to the GGNRA plays fetch with his or her dog. Many people enjoy hiking on trails with their dogs as their companions. There are not enough trails with off-leash access in the Preferred Alternative. The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with dogs, and contribute to crowding and traffic problems, especially in San Francisco's parks, as more and more people are forced into smaller and smaller areas.

Additionally, I believe the preferred alternative holds dog owners to a standard of behavior that is impossibly high, and significantly higher than any other park users. For example, studies by GGNRA staff routinely show

people without dogs "disturb" snowy plovers, but there is no attempt to restrict people without dogs from the beaches where plovers roost (not nest).

The GGNRA's own studies show that joggers and walkers, not to mention parents with toddlers, equestrians, surfers, and other park users "disturb" plovers, yet there is no attempt to restrict their access in the plover areas. As a frequent bystander in the dunes at Ocean Beach, I routinely observe people without dogs camping, sleeping, walking, and picnicking in plover habitat. Additionally, I have on multiple occasions observed SFPD officers riding dirtbike motorcycles through the dunes and over the length of the beach.

There are much less restrictive measures the GGNRA could take to protect snowy plovers, including the use of temporary "exclosure" fencing when the plovers are present. This would keep everyone, people as well as dogs, out of the area. Enforcement that targets people who intentionally disturb plovers would also help.

Severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. A new alternative should target enforcement on the small number of people whose dogs misbehave, rather than excluding the entire class of people with dogs from most of the GGNRA.

Finally, the level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use of GGNRA resources. The DEIS states that it will cost nearly \$1million to enforce the Preferred Alternative, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could more easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs.

Thank you for considering my comments. Here's to a continued dog-friendly GGNRA.

Correspondence ID: 2965 **Project:** 11759 **Document:** 38106
Received: May,16,2011 12:03:55
Correspondence Type: Web Form

Correspondence: Frank Dean 5 May 2011 General Superintendent, GGNRA 201 Fort Mason
San Francisco, CA 94123-0022

Dear Superintendent Dean:

I am writing in support of the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the GGNRA.

As a resident of San Francisco and as a once-ardent volunteer at Crissy Field, I have long been concerned about the impacts of dogs on the wildlife, habitats and visitors in the park.

Although a passionate bird watcher I quit visiting Ocean Beach a year ago because of constantly witnessing dogs chasing shorebirds ? there are few birds to see when there should be many. And it is miserable to see migratory birds molested by dogs.

I am thrilled by your proposed DEIS Preferred Alternatives for all the San Francisco sites. They would best maintain park resources and values for future generations, as well as provide clear enforceable policy for determining dog use in the park.

However, I do have several comments and suggestions to add:

General Comments

The specification that "no commercial dog walking would be allowed" at Crissy Field is especially appealing. Commercial dog walking has no place in a national park, a common property resource. Furthermore, the packs of (unleashed) canines brought to Crissy Field every day by commercial dog walkers destroy the serenity and character of that beautiful site.

Neither should more than one dog per visitor be allowed, either on trails or in ROLAs. On leash dogs fan out and block other users of the trails and it is unlikely that two or more off leash dogs will be kept under voice control.

The DEIS Preferred Alternatives also do not provide for enough hiking and picnicking experiences free of dogs. I would love to see the whole coastal bluffs area from Sutro Baths around to Ft. Point declared a no-dog zone. This is an especially scenic area and the trails are narrow.

The compliance level should be set at 100%, just as for enforcement of any other law where public property is being damaged and public safety threatened; off-leash dogs in prohibited area of GGNRA need to be treated seriously.

And of course, the no dog ban must be rigidly enforced, no ifs, ands or buts. A citation is worth a thousand words. Without tickets the NPS will just waste money, my money, patrolling in vain.

Park visitors need to be encouraged to report violations when the dog regs are enacted, to help reduce the NPS's cost of enforcement. Given the prevalence today of cell phones with cameras, a web site could be set up for visitors to file complaints and post photographs of recalcitrant dog owners and their pets.

My experience is that off-leash dog walkers get belligerent when confronted (even oh so nicely) at Ocean Beach. Filling out a report is cumbersome and useless after the fact. But a report posted on-line, accompanied by photographs of offenders, would help the NPS ID repeat violators and would be quicker and easier than a paper form. Too, it might shame violators into compliance; consumer feedback is a commonplace on the web. Why not for consumers of the GGNRA?

Also, the dog ban for Snowy Plover season needs to be year round ? specifying from July 1 to 15 May is too confusing.

More obvious signage is needed in Plover areas to help visitors comply with wildlife protection and understand that no dogs are allowed in the Area. Small wordy signs at trailheads are not gripping people's attention. A BIG logo of a Plover should be adopted for Crissy Field and Ocean Beach and used liberally to mark the sensitivity of the sites.

Crissy Field

Working on plans for Crissy Field (I chaired the Sierra Club's wetlands committee and advocated for the marsh alternative) I had the clear understanding that dogs would be banned entirely from the west end of the Promenade. Part of the tidal marsh was sacrificed to accommodate the grass Airfield, designated for doggy romps and to compensate dog people for loss of the western Promenade.

As you know, the tidal prism in the marsh is inadequate for good flushing and needs expanded. However, I rarely see people playing with their canine pals on the grassy field. I do see them walking their pet off-leash on the western end of the Promenade.

As a consequence, dogs keep running into the Wildlife Protection Area, off-leash and accompanied by their owners. The WPA has in recent years become a Snowy Plover hangout and needs more stringent protections than currently provided.

The Wildlife Protection Area at Crissy Field needs to be stoutly fenced off all the way around it and down to the low tide line. LARGE signs with a plover logo need to be plastered along the fence right down to the littoral zone. People walking along the beach often just do not see the signs down there.

Creating a ROLA in the center of the Airfield might bring more dogs down to the WPA. The ROLA needs to have fencing to mark its perimeter.

While the dog people at Crissy are considerably less scofflaw than at Ocean Beach and Ft Funston, they will take some time and some coaxing (plus enforcement) to avoid disturbances to the WPA wildlife.

Requiring that dogs be kept on leash in the central beach and promenade areas will hopefully keep dogs from running into the marsh through the channel under the bridge. But the tidal channel's proximity to the beach ROLA means problems.

I think the beach ROLA and its fencing need to be shifted further eastward to protect the WPA visually, as well as the marsh physically and create buffer zones.

And in hot weather the tidal channel is always full of mothers with toddlers splashing in the water ? probably the only place in S.F. where they can. Those users need shielded from off-leash dogs.

Now that a ROLA is designated for the central part of the Airfield can the eastern portion now be turned over to the marsh? I've never been able to see an outline of the old runways in the grasses there ? does anyone? The ROLA would seem to make the pattern even less obvious.

Originally there were plans to have an aeronautical museum with old planes parked around to evoke Crissy's original purpose; those plans never came to fruition and the whole thrust of the Crissy experience now is nature. Time to jettison the Airfield and enlarge the tidal marsh westward.

Certainly the eastern portion of the Airfield should be a no-dog area to protect the grassland birds that are frequently found there in migration.

And of course, enforcement of the leash laws on the Promenade should be 100%, with one dog per person and no commercial dog walking.

Ft. Funston - The Preferred Alternative is fine but the ROLA needs fenced with abundant signage to ensure that the dog play area is effectively delineated from other users.

Also, Ft. Funston is badly beaten up from dog activity and has lost its aesthetic appeal. Habitat restoration is badly needed to return its native plant and animal species, and its aesthetic appeal.

Baker Beach ? The entire Baker Beach area should be declared a dog-free zone to protect its shorebirds and to create a dog-free experience.

The Preferred Alternative advocates dividing the beach into leash-only and no-dog areas which can only generate confusion and enforcement costs.

Lands End ? As mentioned above, I want to see this portion of the coastal bluffs closed to dogs to create a true National Park hiking experience; too the trails are narrow and dogs create a user conflict.

Sutro Heights Park ? I support the Preferred Alternative with no commercial dog walking and one dog per visitor.

Ocean Beach ? Oh boy, is this place hard to patrol and enforce. I support the Preferred Alternative for Ocean Beach.

However, The term "Snowy Plover Protection Area" needs changed to "Wildlife Protection Area" to harmonize with Crissy Field and to acknowledge that this is an important shorebird area.

There also needs to be Plover signage painted on the beach side of the wall all along the WPA (i.e., Stairwell 21 to Sloat Blvd.), readily apparent to beachgoers, to help reduce compliance problems and avoid visitor conflict.

And did I mention enforcement? There is something in the Ocean Beach culture that thumbs its collective nose at leashing a dog. Even though the great stretch north from Stairwell 21 to the Sutro Baths will be open to running off-leash dogs, the NPS will face endless problems with the WPA.

Again, no commercial dog walkers and only one dog per visitor even in the northern stretch of Ocean Beach to maximize the National Park experience for all visitors and prevent conflict between users.

Back when the NPS did patrol dog walkers just carried their leash in case they saw the NPS driving down the beach; the same situation will doubtless prevail. That is why I advocate for making it easy for visitors to report violations; I would be thrilled to snitch and stool pigeon on-line, along with photographs taken from my cell phone.

And the NPS brochure for Ocean Beach could hardly be worse. It shows a vast empty beach. It needs the Plover logo in the foreground, looming over the whole picture.

Correspondence ID: 2966 **Project:** 11759 **Document:** 38106

Received: May,16,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Hello, here are my comments in regards to the Dog Management Plan for GGNRA

--The park's mission is and should continue to be to protect the natural and cultural resources, not allow recreation to undermine it. While I am a dog lover, I feel that wildlife in this case should be considered first.

--Endangered species wildlife habitat deserves a higher level of protection from human disturbance; the compliance rate should be 85% to 95%, not 75% as outlined.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for considering my comments.

Correspondence ID: 2967 **Project:** 11759 **Document:** 38106

Received: May,16,2011 13:18:00

Correspondence Type: Web Form

Correspondence: Hello: I think it would be a terrible thing to implement NO DOGS or NO OFF LEASH for dogs in our beautiful community. The Bay Area is a wonderful place to live that promotes a healthy, carefree lifestyle. By owning a dog it only complements to getting out and living this lifestyle. My three year old black lab is a former Guide Dog in training and has excellent off leash control. Her favorite thing to do is run at Baker Beach and chase the ball. As owners we are sensitive to the fact that not all people are "dog people" and make sure to respect others. It would be a shame to not be able to allow our dog the freedom to run around have to be penalized because there are dogs/dog owners that do not respect this. I strongly oppose this measure and believe there are other ways to go about trying to control bad dog owners.

Correspondence ID: 2968 **Project:** 11759 **Document:** 38106

Received: May,16,2011 13:26:05

Correspondence Web Form

Type:

Correspondence: Off-leash dog areas should be fenced or well-marked to provide a clear boundary for off-leash dog activities. If installing a fence in an area would have an undue biological or aesthetic impact, then there should be no off-leash area in that location. The Park Service should require a minimum of 95% compliance or should initiate measures to improve compliance. If 25% noncompliance is tolerated, it will engender further noncompliance and make the situation worse. Commercial dog-walking should not be permitted in the GGNRA. The Park Service is supposed to allow only commercial activities in the parks that further park visitors' experiences. Commercial dog walking does not enhance anyone's experience of the parks. While dogs are important parts of our families and communities, they are having a significant negative impact on thousands of other animals and plants that rely on the park to survive, as well as a negative impact on many human visitors. The parks should be maintained to protect their natural and cultural resources for future generations and to be safe and accessible for all users.

Thank you for the opportunity to comment on this issue. PLEASE take seriously the comments of all of us who want the Park Service to take responsibility and do its job to manage and control off-leash dogs in the GGNRA.

-Marjorie Blackwell

Correspondence ID: 2969 **Project:** 11759 **Document:** 38106

Received: May,16,2011 14:04:20

Correspondence Type: Web Form

Type:

Correspondence: It is unfortunate that San Francisco dog groups and the GGNRA hasn't come to a meanful compromise for recreational off leash dog areas in the San Francisco BayArea. For 15 years I have walked at Ocean Beach and Fort Funston with dogs. I have enjoyed all the different seasons and wildlife, making my living in S.F. more torrable. In addition I have found friendships within the community of dog walkers that is very meaningful to my quality of life. I addopted my dogs because there was space for me and then too play and run, the new restrictions would deny me access to these areas because my dogs need to be able to be off leash in a responsible manner. This would create high use at other non GGNRA parks. I would urge the GGNRA to review it's lastest restrictions and propose a compromise that would allow all users the oppportunity for recreation in the GGNRA. One idea that works well in other major cities is the creation of dog walking hours (off leash)that would accomadate different people's desire to for multiple use of parks. Please don't shut out off leash dog walkers from GGNRA areas that have been traditionally accomodating for various recreational users.

Correspondence ID: 2970 **Project:** 11759 **Document:** 38106
Received: May,16,2011 14:18:11
Correspondence Type: Web Form
Correspondence: Dogs belong on a leash. In order to give the widest range of interests the ability to share the park, dogs belong on a leash. Dogs cause significant environmental disruption when allowed to run freely. Not only that but, many people are afraid of dogs, and allowing the dogs free access to the park will essentially bar these same people from also enjoying the park.

We instituted the park system to protect the wildlife there, allowing off-leash dogs is counter to that protection.

Correspondence ID: 2971 **Project:** 11759 **Document:** 38106
Received: May,16,2011 15:38:00
Correspondence Type: Web Form
Correspondence: I object to the reduction of "off leash" space for dogs. The current rules are fine. There is a balance so people can enjoy their dogs, or those who don't have very many other options on where to go. This is about balance for all. Also reduction of off leash space will push people to other parks. Like the city and county ones and overwell them.

Thank you for your consideration.

Janet Zona

Correspondence ID: 2972 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I think the proposed dog policy is a big mistake for the following reasons:

* San Francisco is a densely populated city, with many of its populace, dog owners. Every group has equal needs from the parks. The dog owners should not be less served. * There is a need to exercise dogs. Sidewalks are not sufficient. The existing "dog parks" are not sanitary and they are not conducive for good socialization.

* Dog and people socializing in the parks helps lower vandalism and crime.

Correspondence 2973 **Project:** 11759 **Document:** 38106

ID:**Received:** May,16,2011 00:00:00**Correspondence Type:** Web Form**Type:**

Correspondence: Please use your time and money to punish those few dog owners who cause problems, not by preventing a great deal of the population from enjoying our walks with our dogs. Walking my dog is about the last thing I can afford to do for entertainment and there is no reason to put such egregious restrictions on those of us who clean up as we walk and leave the space in a better way than it was when we started. Is socail networking all that will be left for entertainment? Growing up in SF and spending my entire life in SF and Sausalito, I am educated and adult enough to make good decisions about my dog and myself and healthy and environmentally appropriate dog walking. So, what's up with the draconian proposal? Please reconsider so OUR space can be used by everyone. Thank you.

Correspondence ID: 2974 **Project:** 11759 **Document:** 38106**ID:****Received:** May,16,2011 17:25:59**Correspondence Type:** Web Form**Type:**

Correspondence: Greetings, I work with environmental education in the Marin Headlands and hope that the impact on groups of students visiting Rodeo Beach has been considered. We often have dogs (friendly or not) run up to and in the middle of student groups. This can be very distracting as well as upsetting for students who are afraid of dogs (which happens fairly often). It can be scary when a group is seated at the beach and a dog comes running up at the students' eye level. At times we have even had some aggressive dogs approach our groups. Additionally, it is challenging to teach students' to respect their parks when dogs are running into and along the edges of the lagoon, after birds or surfers or chasing other wildlife. Additionally, several of our staff witnessed a dog run a deer into the lagoon where the deer then drown. As an educator, I would rather have natural wildlife running free than dogs. It would be nice if perhaps from the lagoon bridge to the right dogs could be off leash- that way student groups could head left from the bridge to access trails and enjoy the beach. I'm writing this as an individual and not representing any organization or institution. Thank you.

Correspondence ID: 2975 **Project:** 11759 **Document:** 38106**ID:****Received:** May,16,2011 17:44:39**Correspondence Type:** Web Form**Type:**

Correspondence: Dear GNNR, I live on Sneath Lane in San Bruno and walk my little friendly terrier mix on Sweeny Ridge Trail all the time. I heard that this might not be allowed soon anymore?? I truly hope that this is not true. MY physical and

mental well being depends on this out- door activity. Some neighbors here and ourselves moved here to be close to nature AND to bring our dogs on walks in the back on Sweeney Ridge Trail. I have 4 children an THEY also go running there (teenagers). They always bring the dog with them as well. I feel it is safer for them as well. We leave our dog on leash and never ever had any trouble with any other dogs here! As the trail is paved and is lined and surrounded by thick brush and poison oak there is really no danger for the dogs who are off leash to cause any harm or go anywhere but stay on the trail. It would be very very sad for our family not to be able to use this wonderful trail WITH our dogs!

Correspondence ID: 2976 **Project:** 11759 **Document:** 38106

Received: May,16,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas 7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation

I am a Latina dog owner who lives in SF and accesses parks such as Fort Funston, Ocean Beach and Crissy Beach at least 2-3 a week. Enjoying those parks with my dog significantly improves my quality of life in the city. I have been a dog owner in the city for over 8 years and find that the majority of dog owners / walkers use these parks responsibly and what the plan describes as hazards and nuisances are the exception and not the rule.

In my experience, there are regulations in place to protect the wildlife at both Crissy Beach/ Field and Ocean Beach, restricting dogs during key seasons. These regulations seem to be sufficient and seem to be respected by dog owners

Finally, given the current budget crisis both at a federal and state level, this amount of regulation and enforcement seems to me to be a misplaced use of our resources. There are already many beautiful areas within the GGNRA that are off limit to dogs (point reyes, muir woods). Imposing a ban on the few open areas that we still have available, will drive me not to visit any parks in the GGNRA and consequently not support any of the GGNRA's

efforts to raise funds or do any other type of positive civil action.

I sincerely hope you reconsider this unwelcomed dog ban and let me and Shiraz continue to enjoy nature in a responsible manner.

Sincerely.

Larissa Acosta

Correspondence ID: 2977 **Project:** 11759 **Document:** 38106
Received: May,16,2011 17:48:34
Correspondence Type: Web Form
Correspondence: I would be willing to pay at least 5 dollars per visit to keep dog access to the current on-leash dog areas. I recommend you start charging.

Or, you will have to at least quadruple your enforcement budget because if you implement the suggested plans most people will ignore them because the plans are punitive to the point of insulting. Insulting to the tax payers that support the NPS.

So, either make money from access fees and and increase recreation access? Or spend all the public money on enforcement to exclude the public from public recreation land? Which will the NPS do? The answer to that will say a lot about the NPS and its role as a supposed public office.

Correspondence ID: 2978 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. There are plenty of parks and spaces in this area where the dogs are not even allowed but only a very limited space that the dogs can walk off leash. Taking away this limited space from the people and the dogs is a bad policy and unfair. People benefit tremendously by walking their off leash. They are healthier and happier with this exercise. Also, well behaving dogs deserve to be off leash sometimes.

Correspondence ID: 2979 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to:

7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas

7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation

The best activity I can do, as an insulin diabetic for over 40 years, is to walk my dog at Ft Funston. Ft Funston has a special place in my heart. I have always taken my dogs there and enjoy seeing the bliss they have received frolicing with other dogs and the sense of freedom that they and I enjoy. My dogs have always been at their happiest there. When one passed away and I was given her ashes, I knew the best place for them was on the cliffs at Ft Funston. By not allowing dogs there you are not only my and my current dog of great times, but you will erase the great memories I have had in the past, knowing that others cannot enjoy what we previously experienced.

Please, do not let extremists take away a special place that dogs and dog lovers enjoy.

Correspondence ID: 2980 **Project:** 11759 **Document:** 38106

Received: May, 16, 2011 18:10:39

Correspondence Type: Web Form

Correspondence: My wife and I are long term residents of San Francisco and we regularly use and enjoy portions of the Golden Gate National Recreation Area. Presently, we are around 70, but this enjoyment has gone on for many years. As others have, I am sure, we have noticed an increasing number of dogs, particularly off leash, interfering with what we believe to be the basic idea behind the park lands: the enjoyment of nature and the animal and plant life which so wonderfully populates it. Dogs, in a word, basically ruin the experience, and by running wild and being off leash add an entirely different element to the experience. One is no longer experiencing some kind of natural encounter, but put into some kind of whirling activity, balls being thrown, dogs running and barking, and the expected trampling of plants and attacks on wild life. We think dog owners basically have taken over the outdoor lands as if they are their own doggie playgrounds.

While it seems unrealistic to hope that dogs could be banned entirely from the national park experience, we think the dog plan that has been devised after extensive study is a good faith, fair, and relatively objective way of trying to control the most destructive aspects of running dogs and not banning them entirely. To be sure, any self-interested group could probably find reasons to dislike portions of the plan. But, overall it seems a rather excellent one. We heartily support it and hope that the national park service stands it ground and resists the efforts of dog owners to push their own agenda to the detriment of anyone who does not own one. We support the plan. David and Inge Nevins

Correspondence ID: 2981 **Project:** 11759 **Document:** 38106

Received: May,16,2011 18:14:43

Correspondence Type: Web Form

Correspondence: This plan misses the real problem. The real problem is that in San Francisco there is a dangerous mixture of ignorant people and entitled people. People who think, for some ridiculous reason, that they are not responsible for what their dog does in a public space. The answer is not to take away the limited space that dog owners have left in which to let their dogs run, but to levy heavy fines against people who let their dogs run rampant and/or don't clean up after their dog. Fine these people. Fine them exorbitant sums (the state does need money, yes?) Until they realize that their mom is not around to pick after them...or their dog.

OR, if the snowy plover is really the issue, then the GGNRA is going to have to ban a lot more than dogs from their spaces. You'll have to figure out a way to keep the humans away from the parks as well. Who is doing the real damage to our natural parks? For the most part, it's the humans, not the dogs. All you need as evidence for this fact is to go visit Baker Beach, (where I take my dog five days a week), on two separate occasions. Go first on a gloomy/foggy weekday evening, when the majority of people you'll see will be people walking their dogs. Then go on a Sunday evening after a really nice and sunny weekend. The whole place is trashed, literally. The trash cans are overflowing with trash that the high tide is washing out to sea. The difference is shocking. Don't blame the dogs and don't punish the people who are good dog owners. Blame the idiots. Blame them and then fine them. If you need someone to hand out tickets, I'll be happy to go through a training session for it.

Sincerely, Kevin Rolston

Correspondence ID: 2982 **Project:** 11759 **Document:** 38106

Received: May,16,2011 18:51:20

Correspondence Web Form

Type:

Correspondence: I oppose the GGNRA dog management plan. I think it will result in an increase # of dogs in shelters and euthanized (a good dog is a tired dog), will increase unemployment (dog walkers are a new cottage industry) and will reduce the number of people of enjoy Fort Funston and Crissy Fields (I lived in the Bay Area for 15 years before enjoying GGNRA parks and it is my dog and favorite hiking companion who brought me to them).

Correspondence ID: 2983 **Project:** 11759 **Document:** 38106

ID:

Received: May,16,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. Off leash dog walking benefits people, their dogs and the society. Our entire family enjoys walking our dogs (we adopted from shelters) off leash at these off leash parks and I am sure a lot of people feel the same way. We learn so much from dogs - love, kindness, acceptance, non-judgement, forgiveness, patience, companionship,.... Letting them enjoy a little bit of off-leash times is a very small reward for how much they contribute to the society and it's good for the people. Thanks.

Correspondence ID: 2984 **Project:** 11759 **Document:** 38106

ID:

Received: May,16,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. My dog, Happy and I enjoy walking off leash at Ocean Beach and Fort Funston and would like to continue to do so. Thank you.

Correspondence ID: 2985 **Project:** 11759 **Document:** 38106

ID:

Received: May,16,2011 19:06:57

Correspondence Web Form

Type:

Correspondence: Dogs off leash are not just a threat to wildlife, but also to people and other dogs. Keeping a dog on a leash in an unenclosed area is just part of good pet ownership. It also keeps the dogs from getting hurt themselves.

Correspondence ID: 2986 **Project:** 11759 **Document:** 38106

ID:

Received: May,16,2011 19:07:12
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 2987 **Project:** 11759 **Document:** 38106

Received: May,16,2011 00:00:00
Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to:

- 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas

7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation

My boyfriend and I recently moved to the Outer Richmond specifically to be close to Ocean Beach. We have a 3 year old Husky who needs the open spaces such as Ocean Beach and Ft. Fuston for exercise. Just as we both place high importance on our own fitness, it is equally as important for Scando. It would be a travesty if beach and other recreation privileges were taken away for our canine friends. Please do not ban the dogs.

Correspondence ID: 2988 **Project:** 11759 **Document:** 38106

Received: May,16,2011 00:00:00
Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to:

- 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas
- 7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation.

I am a tax payer who works in the high tech industry in Silicon Valley. I don't have children--I have dogs. Dogs reportedly outnumber children in SF, at least--I don't know about the rest of the Bay Area. The parks should serve the recreational needs of ALL citizens, including those of us who have dogs. My dogs are a lot less obnoxious and they have less of an impact on the land than most of the kids I see out there.

Furthermore, with the state's budgetary problems, who is going to enforce the new laws, and who is going to manage the sudden influx of dogs into city parks if dogs are banned in GGNRA lands?

GGNRA, you seem to have forgotten an important part of your charter-- RECREATION. I hope that one thing that comes out of this process is that you will be forced to have more accountability as an organization. You truly seem to have lost your way, and I will join any and all efforts to reign you in as an organization.

Correspondence ID: 2989 **Project:** 11759 **Document:** 38106

Received: May,16,2011 19:56:33

Correspondence Type: Web Form

Correspondence: As a long time resident of San Francisco, voter, parent, environmentalist and dog supporter I strongly oppose the GGNRA's proposed policy to significantly restrict where dogs can walk off leash at Fort Funston, Crissy Field and several other federal parks accessible to San Francisco residents.

The GGNRA is not a wilderness area -- it is a recreation area. My understanding is that off leash areas in the GGNRA comprise less than 1% of the 78,000 acres managed by GGNRA. This recreation area is for people who live in an urban environment. The vast majority of San Franciscans have small or no yards and little public open space available for recreation. Many San Francisco residents have dogs and those dogs need exercise. The GGNRA's proposed policy completely fails to address both the needs of dogs and people who exercise with their dog.

Let's not try to fix what isn't broken. The 1979 Pet Policy is a proven model where people, dogs, wildlife and the environment successfully co-exist. My family of four recreate with our dog at Fort Funston so we ALL get exercise and ALL enjoy this wonderful park. The proposed policy will inevitably destroy the diverse sharing of these urban recreation areas.

This is an ill conceived plan. We need to make room for the plants, the animals, the people and the dogs. The GGNRA proposal fails to do that.

Correspondence ID: 2990 **Project:** 11759 **Document:** 38106

Received: May,16,2011 20:36:49

Correspondence Type: Web Form

Correspondence: San Francisco is a unique place and the beautiful areas with off leash dogs are a wonderful thing. I am currently NOT a dog owner, but I have found that the majority of the time the dog owners in the off leash areas are very responsible for their dogs. There are a lot of dogs in the city that need a place to run. There are absolutely not enough viable places to do this if the new restrictions take place. There are plenty of places where there are already leash laws in place... Please allow dog owners and dog lovers to have the opportunity to continue to enjoy our part of the park, the way we have been able to in the past.

Correspondence ID: 2991 **Project:** 11759 **Document:** 38106

Received: May,16,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. My dog and I enjoy walking and being outside in our community. It is healthy for both of us and i am a very responsible dog owner. Please don't limit our access to areas.

Correspondence ID: 2992 **Project:** 11759 **Document:** 38106

Received: May,16,2011 21:58:02

Correspondence Type: Web Form

Correspondence: I am opposed to the new GGNRA dog management plan and any other plans that reduce or ban dogs from the open spaces or trails where they are currently allowed. There are so few places to exercise our dogs as it is, the huge reductions in allowable trails and areas will create overuse of remaining areas.

One of the things that makes the bay area such a desirable place to live is its number of recreational opportunities. Walking with my dog on a variety of trails and exploring new areas are part of the joy of living here. Recreational areas should be open to all.

Correspondence ID: 2993 **Project:** 11759 **Document:** 38106

Received: May,16,2011 22:08:46

Correspondence Type: Web Form

Type:

Correspondence: I am writing as a voter, taxpayer, and responsible dog owner to oppose the GGNRA draft dog management plan. It goes too far in banning and restricting dogs. Walking and hiking with my dogs is one of my main forms of recreation. It's good for my physical and emotional health. Most of the California state parks and the federal parks are not dog friendly, which makes it more essential that the few places where dogs are allowed be maintained. I think the draft management plan greatly exaggerates the issues related to dogs in the GGNRA. To the extent that there are issues, these can be minimized by establishing different trails or parts of beaches where dogs are allowed and not allowed, so that RA users who don't like dogs can recreate without them being present. Most dog owners clean up after their dogs. Overall, I'd say dogs make less of an environmental impact than most humans. The presence of dogs also makes the beaches and trails feel safer and more family friendly. Thank you for considering my input. I hope the draft plan will be revised to reflect a more balanced view of the need for dog-friendly recreational space adjacent to the SF urban/suburban region.

Correspondence ID: 2994 **Project:** 11759 **Document:** 38106
Received: May,16,2011 22:18:38
Correspondence Type: Web Form
Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

Correspondence ID: 2995 **Project:** 11759 **Document:** 38106
Received: May,16,2011 22:23:40
Correspondence Type: Web Form
Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

Correspondence ID: 2996 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful.

Correspondence ID: 2997 **Project:** 11759 **Document:** 38106
Received: May,16,2011 22:43:37

Correspondence Web Form

Type:

Correspondence: I'm writing to oppose the GGNRA draft dog management plan and any additional limiting or banning of dogs in GGNRA parks. These parks are supposed to be for the public, by banning dogs, by limiting dogs, you are limiting citizens from enjoying these open spaces. Dog owners are citizens too. We pay taxes. I go to Fort Funston every week if you ban dogs I will no longer be able to use this space. I understand the need to require dog owners to abide by rules, but banning and limiting isn't an option.

Correspondence ID: 2998 **Project:** 11759 **Document:** 38106

Received:

May,16,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: I lived in San Francisco for a couple years with my rescue Border Collie pup and the open space available to dogs was such a wonderful asset. I actually chose my house because it was within walking distance of Fort Funston and I was able to walk/run with my dog before work. If she were leashed she certainly would not have been able to work off all her puppy energy. I attribute her off-leash romps as a primary reason along with training that she is such a well behaved adult.

Currently, I live on the peninsula and there are very few off-leash dog areas. I actually pay a substantial fee to hike off-leash with my dog locally, and would much prefer to pay GGNRA or another government agency rather than a private group.

Dog friendly areas are such a benefit to the community, it would be a great loss if dogs were restricted.

Correspondence ID: 2999 **Project:** 11759 **Document:** 38106

Received:

May,16,2011 23:08:55

Correspondence Web Form

Type:

Correspondence: Please do not implement the content of the draft that will curtail recreation within the GGNRA of dog walking on or off leash. We have been enjoying these areas for many years with very little impact on wildlife or habitat of other species. Co-existence has been, and is, the key to civilized life. Dog owners comprise a huge percentage of the population. They are our companion animals and thus, help to make us more human by our relationships to them and how we care for them in an urban setting. The GGNRA is really an urban park and should have it's own unique rules by which we can all co-exist. It is not a wilderness park but is accessible by the population.

Correspondence ID: 3000 **Project:** 11759 **Document:** 38106

Received: May,16,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to:

- 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas
- 7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation

We live in the Soma neighborhood and there are very few places to take our basset hound to in the city. There's an off-leash park all the way across town in Golden Gate Park, and there's Chrissy Field and Fort Funston. Marley, our hound, loves Chrissy Field. He doesn't both any people, he doesn't go in the water, he doesn't go near the wildlife.... he just likes to say hello to the other dogs and to take in all the wonderful smells.

Almost all people with dogs control and pick-up after their dogs and walking with our dogs is good exercise and makes us and our dogs healthier and safer. On the whole, I find family dogs to be far better behaved than people and have seen no serious safety issue with a well exercised, socialized, and trained dog. This plan only makes it more difficult for people to responsibly care for their dogs and themselves.

Regards,

Mark Hunter

Correspondence ID: 3001 **Project:** 11759 **Document:** 38106

Received: May,17,2011 06:51:34

Correspondence Type: Web Form

Correspondence: Please keep our open spaces dog friendly, and modify the Dog Management Plan for the Rancho Corral de Tierra space to allow for dogs. For decades, locals and visitors have walked their dogs on this lovely land. We need this recreation area to remain available to dog owners who care for the land and its preservation. Please find a more balanced solution to accomplish all the goals of the GGNRA and the people and animals using the land.

Correspondence ID: 3002 **Project:** 11759 **Document:** 38106
Received: May,17,2011 07:19:27
Correspondence Type: Web Form
Correspondence: Dogs are a part of many families in our communities and our two dogs go everywhere with us. We do a lot of hiking and beach walking with our dogs and always follow all rules and pick up after our dogs. When I go running in Spring Lake Park, I bring my dog partially for protection--and will not enter the park for a run without him. Before you punish responsible pet owners, like myself, I would encourage you to do an indepth study of the effects that banning dogs from the parks would have on all involved. I have not read one compelling reason to ban dogs from the parks and feel that it is the effort of a few people who do not like or understand dogs. Please do not sign such a wide-stretching ban without a more indepth study to be fair to all involved.

Sincerely Annette Thomason

Correspondence ID: 3003 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3004 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3005 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Web Form
Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

These dog facilities are critical to the Canine loving population and keep dogs out of our shelters. Taking these areas away from dogs will cause dogs

to have unspent energy, develop aggression, and separation anxiety issues causing their owners to decide they are more work than they bargain for and shelter dumping will skyrocket. Please leave these parks alone.

Correspondence ID: 3006 **Project:** 11759 **Document:** 38106
Received: May,17,2011 08:12:55
Correspondence Type: Web Form
Correspondence: Please preserve outdoor off leash areas within the city park systems for dogs and their families. Thank you

Correspondence ID: 3007 **Project:** 11759 **Document:** 38106
Received: May,17,2011 08:34:58
Correspondence Type: Web Form
Correspondence: I oppose the GGNRA draft dog management plan. Humans walking/hiking with their dogs is a safe and healthy recreational activity. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation.

Fort Funston is the GGNRA space I visit with my dogs the most. Walking/hiking there is a pleasure. I am a long time dog professional (20 years experience - certified, etc) who deliberately avoids fenced in dog parks. Fenced in dog parks are where uneducated owners and uneducated dogs go - dogs with no training or discipline and owners who sit on benches yakking on cell phones and ignoring their dogs. Fenced in dog parks are a nuisance. They are noisy - often smell bad and create behavior problems.

Please keep GGNRA spaces open for human and dog use!

b

Correspondence ID: 3008 **Project:** 11759 **Document:** 38106
Received: May,17,2011 10:12:50
Correspondence Type: Web Form
Correspondence: I oppose the plans to prohibit or reduce dogs in the open space areas of GGNRA.

Correspondence ID: 3009 **Project:** 11759 **Document:** 38106
Received: May,17,2011 10:25:20
Correspondence Type: Web Form

Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

Correspondence ID: 3010 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Web Form

Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces." Keep parks dog friendly.

Correspondence ID: 3011 **Project:** 11759 **Document:** 38106

Received: May,17,2011 10:44:01

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3012 **Project:** 11759 **Document:** 38106

Received: May,17,2011 10:52:31

Correspondence Type: Web Form

Correspondence: My suggestion, is that individuals may "earn credits" that would allow them to have off dog leash privileges. Using this scheme, one would enroll in a program. The program could be administered by a non-profit agency associated with GGNRA. The agency would on a regular basis conduct such activities as beach clean up, maintainance and environmental improvement. Those individuals who participate in the program would earn the right to have off-leash dog ability. These credits would not be able to be swapped [like carbon trade-offs], or sold. It is my opinion that this is a win-win solution. If you would like to hear more from me, please write me for additional comment.

Correspondence ID: 3013 **Project:** 11759 **Document:** 38106

Received: May,17,2011 11:14:21

Correspondence Type: Web Form

Correspondence: I think its ridiculous the amount of money spent on this stupid shit. Do you fools not know how broke we are. How about getting a real job.

Correspondence ID: 3014 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00
Correspondence Web Form
Type:
Correspondence: Dear Superintendent Dean,

I love Crissy Field and Fort Funston and visit these places regularly. I no longer own dogs, but I used to walk my two Irish Setters on Crissy Field and the adjacent beach every day for 15 year. Their off-leash recreation contributed to their long lives and quality of life, as well as my own. Never once during that period did I encounter one negative impact to the environment from any dogs in the area. In fact, I saw countless snowy plovers and other birds along the shore in harmony with the dogs and humans nearby. I always cleaned up after my dogs, who were very well trained and socialized and always promptly responded to voice control. Like the vast majority of off-leash dog walkers, I was a responsible dog owner.

The GGNRA already has an extremely small amount of space set aside for off-leash dog walking as it is, and the proposed "Preferred Alternative" plan to limit the available space is draconian, pointless, absurd, unfair, and unrealistic. This plan would destroy the quality of life for thousands of people and dogs who deserve their continued enjoyment of and recreation in our open spaces. The limitations presented in the "Preferred Alternative" are way too radical in scope. This plan was obviously crafted by a very narrow minded small group biased against dogs, with little to no scientific evidence to justify their proposal.

The real impact to the environment of the GGNRA is from humans who do not pick up their trash. I have personally picked up huge amounts of food wrappers, plastic beach toys, cigarette butts, and other human trash.

The GGNRA needs to realize that these open spaces have always been used by the people of San Francisco and the Bay Area for recreation that includes off-leash dog walking, and to limit these spaces in such a myopic and draconian manner amounts to nothing more than environmental extremism. I am certain that a much more fair and balanced compromise can be reached than this ridiculous and misnamed "Preferred Alternative."

Sincerely,

Jonathan Maguire San Francisco

Correspondence 3015 **Project:** 11759 **Document:** 38106
ID:
Received: May,17,2011 00:00:00
Correspondence Web Form
Type:

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas 7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation

Recreation time spent with my dog is as important for me as it is for her.

Correspondence ID: 3016 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: ? Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas

I am a mother and one of our most enjoyable moments is to go to the parks and watch the dogs run free. We meet with other moms in the area and the children love playing with the dogs and meeting new friends. It helps us teach our children about dogs, animals, and pets.

Correspondence ID: 3017 **Project:** 11759 **Document:** 38106

Received: May,17,2011 12:27:08

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3018 **Project:** 11759 **Document:** 38106

Received: May,17,2011 12:29:59

Correspondence Type: Web Form

Correspondence: We need to preserve all of the dog parks in the county of San Francisco and beyond. I am a dog owner and these parks serve a vital need and purpose for

myself and all dog owners, as well as the independent business owners whose livelihoods depend on these parks. Please keep them open. Thank you

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| Correspondence ID: | 3019 | Project: 11759 | Document: 38106 |
| Received: | May,17,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas 7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation | | |

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| Correspondence ID: | 3020 | Project: 11759 | Document: 38106 |
| Received: | May,17,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas 7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation My wife and I walk our three little dogs on Baker Beach in the Presidio (GGNRA) and they are well received by the public that comes in contact with them. the only problem we see is that occasionally there are owners that can't control their dog, have them on or off leash. The same owners also have problems with the same dogs on or off leash on the city streets and parks. We live in an urban setting and Baker Beach is great for our dogs, is convenient and we don't disturb anyone. It would be unfairly restrictive to | | |

punish the owners and dogs of the majority of people in our area by banning dogs from the GGNRA. I hope you consider revising the dog management proposal to meet the majorities wishes and desires.

Robert I. Kahn, M.D. and Karen Kelly San Francisco, CA 94121

Correspondence ID: 3021 **Project:** 11759 **Document:** 38106
Received: May,17,2011 13:27:19
Correspondence Type: Web Form
Correspondence: commenting on proposed dog laws for the park system. I dont think there is a problem with the current dog laws. I feel as long as the dog is under control or leashed it is not a problem. clearly some people are not very responsible for there dogs when there out walking them and that certainly can scare people alot. as long as the dogs are not chasing birds ect like at the lagoon at rodeo beach, its ok. I think the dog owners should be fined if they are causing problems. but I dont think the dog owner should be punished for a few bad owners. walking dogs is good exercise for the owners & the dogs. it also allows people to meet & pet the dog, and who knows maybe find a new friend. dont restrict the dog owners access. I currently do not have a dog. thank you jim clausen

Correspondence ID: 3022 **Project:** 11759 **Document:** 38106
Received: May,17,2011 13:41:43
Correspondence Type: Web Form
Correspondence: I support these rules wholeheartedly. They still allow dogs to share our parks, but do so in a responsible way. I have been a volunteer in the Park since 1993, and have seen the damage that a small number of uncontrolled dogs can cause - along with the impact of the high numbers of dogs, even when they're under control. It's frustrating to see habitat restoration work destroyed by dogs digging and romping; as a bird lover, it's painful to watch dogs chase birds who are trying to rest or feed; it's annoying to encounter ill-behaved dogs who jump on people, tussle with other dogs and steal food from picnickers while their inattentive owners ignore the situation. There's the issue of dog-walkers running their businesses in the parks without any oversight or payment to the park (imagine the outcry if there were as many T-shirt vendors as professional dog walkers at Crissy Field). And of course, there's all of that not-picked-up dog waste...

I like dogs a lot, it's just the owners who can be problematic. We live in a densely populated area, and we have to be able to share these spaces. The dog owners have been dominating the discussion for years, and I'm glad that other voices are being heard. I don't mind sharing the park with dogs, but I

don't want them ruining the experience for others (including the wildlife).

Thanks for taking these sensible steps, and I wish the park good luck in enforcing the new rules... they'll need it.

Correspondence ID: 3023 **Project:** 11759 **Document:** 38106
Received: May,17,2011 13:50:59
Correspondence Type: Web Form
Correspondence: Hello and thanks for the call to Golden Gate Raptor Observatory volunteers to comment on this plan.

I can only comment on the Fort Funston part of this EIR and mgmt plan, as I frequently brought my dog there when I lived in Redwood City. I think Alternative C is reasonable and makes sense as a solution to keep the beach open to dogs, while protecting the nesting birds.

Thank you,

Emily Weil GGRO volunteer

Correspondence ID: 3024 **Project:** 11759 **Document:** 38106
Received: May,17,2011 14:14:07
Correspondence Type: Web Form
Correspondence: Thank you for your requests for comments and the extended deadline.

I've been volunteering at the Marin Headlands once a week for much of the last 10 years (and enjoying the nearby trails between Rodeo and Tennessee Valley and Muir Beach, and the area around Bass Lake for much longer than that). While I understand the enjoyment people get from getting outside with their dogs, my concern and priority is for the wildlife and fragile soils and native plants growing in the Headlands and in other parts of the Park.

There are birds that nest on the ground in coastal scrub and riparian areas. Dune areas and their plants have been largely destroyed because of human use. Wild animals in parkland, and birds on beaches are killed or scared away by dogs off leash (and probably on leash as well). I'm very concerned about Muir Beach and Stinson Beach, because with the Headlands, those are places I'm most familiar with.

I notice that you have seasonal on leash restrictions for snowy plover areas and such. I have to trust that you have found that onleash is sufficient. I

mistrust dog owners enough that I'd ban them at such times altogether.

Finally, as a frequent volunteer/visitor, I get really disgusted and have zero tolerance for dog poo that's left behind, and just the possibility of it makes my visits to the beach much less enjoyable. For this reason alone, I think that at least half of your beaches should be dog-free.

Thanks so much for addressing this issue.

Sincerely, Allison Levin

Correspondence ID: 3025 **Project:** 11759 **Document:** 38106
Received: May,17,2011 14:17:36
Correspondence Type: Web Form
Correspondence: Allow dogs and horses access to the GGNRA as they have now.

Correspondence ID: 3026 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and all action alternatives that further reduce or ban dogs in open spaces. Urban canines need some space to run for their own health and we as a society need to have space available to them.

Correspondence ID: 3027 **Project:** 11759 **Document:** 38106
Received: May,17,2011 14:36:04
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

Correspondence ID: 3028 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas

7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation!!

As the owner of two well behaved dogs (one is a service dog) I strongly oppose the GGNRA draft dog management plan. I work at the SFVA medical center as a professional health care worker and see on a daily basis the uncomparative value dogs provide to both Veterans and non Veterans alike, seeing eye dogs, seizure alert dogs, companionship dogs, etc... We need to recognize the insurmountable value service dogs provide, outside of even just a family relationship, and start to give back to those four legged animals that give so much to us through their endless service, loyalty and companionship...is 1% area really too much to say thanks?

This world is coming to be about nothing but GREED--are there those that are that shameless that even the dogs are embarrassed for us.

Correspondence ID: 3029 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to:

7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas

7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation

Correspondence ID: 3030 **Project:** 11759 **Document:** 38106

Received: May,17,2011 15:00:51

Correspondence Type: Web Form

Correspondence: I think this is completely out of the rights of GGNRA to enforce this law. They will not only force people to move out of the city (in which I guarantee there are more people living in the city with dogs than with children)and

will also put small business owners at risk in an already deteriorating economical state in CA. Dogs are a part of peoples family. Some by choice, others b/c they need them for service issues, and others b/c they can't have children and need companionship. If you take away the places that make san francisco dog friendly and a desirable place to live therefore eliminating the amount of exercise for dogs - it will be more likely that dogs will be unhappy and act out. Also - does anyone remember that it was a Man who stabbed a DOG for no reason in fort funston months ago???? It wasn't a dog who attacked a person it was a person attacking a dog. So why aren't humans banned from the park - why is it dogs are? It's an outrage and frankly completely financially irresponsible and dumb for the city to enforce this new legislation There are 100's of people who dog walk as a job or a business and you will be helping to raise unemployment in the state of california and making a stand against loving dog owners who frankly are the ones who support and contribute to the park funds. It is not right and I guarantee noone will ever abide by the legislation - you will have to be able to ticket thousands of dog owners in one day b/c the owners will never give in.

Correspondence ID: 3031 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

My wife and I are both strong supporters of the park system and I can promise that our support will drop off precipitously if this and similar legislation is passed. I know that we, along with many other responsible dog owners, feel the same way. There is a saying of "don't bite the hand that feeds you". Surely, you must realize that pet owners are some of the highest utilizers of parks/park services. Logically, these same people are likely to be the parks departments greatest supporters. This bill is filled with erroneous conclusions, falsely stated "facts". As the parks department is under greater scrutiny than ever, you must realize that it is more important than ever to proceed carefully with these types of broad sweeping reforms. I for one can promise you I will not donate a single cent to the Parks department (currently, I contribute between 200-300 dollars/year) if this goes through. Please feel free to contact me regarding any questions or comments.

Correspondence ID: 3032 **Project:** 11759 **Document:** 38106

Received: May,17,2011 15:27:31

Correspondence Type: Web Form

Correspondence: To Whom it May Concern,

I am writing this letter in support of dogs. As a lifetime dog lover, and current dog owner in the city of San Francisco, I am completely floored over the attempt to ban dogs from being off leash. I do understand the need to preserve wilderness, and I myself am an advocate for protecting land and animals. However, there must be balance, as with everything in life. If this land is taken from the dogs, they will have no where safe to play in the city. The land has been being shared with dogs, humans, plants and animals for the last 1,000 years. I do not want this plan to pass.

Jackie Conlin

Correspondence ID: 3033 **Project:** 11759 **Document:** 38106
Received: May,17,2011 16:03:33
Correspondence Type: Web Form
Correspondence: 20 April 2011

Mr. Frank Dean, General Superintendent GOLDEN GATE NATIONAL RECREATION AREA (GGNRA) Building 201, Fort Mason San Francisco, CA 94123-0022

SUBJECT: GGNRA LAND-USE POLICY / DRAFT ENVIRONMENTAL IMPACT STATEMENT for DOG MANAGEMENT IN GGNRA

Dear Superintendent Dean:

We are writing to comment on the above captioned Draft EIS. The "dog management" issue is emblematic of a much larger problem, in that there is a serious lack of understanding of appropriate land-use policy when formulating design-guidelines for our parklands.

Fundamentally, the GGNRA is composed of two distinct land-use patterns whose basic criteria are at direct odds with each other: urban & wilderness.

The Presidio & Ocean Beach areas of San Francisco are an integral part of the urban-parkland fabric, within the densest urban area west of the Hudson River. Conversely, areas of the GGNRA - north of the Golden Gate and south of Ft. Funston - are part of a rural-wilderness domain that is the polar opposite, as viewed in land-use planning.

Design priorities for wilderness parks are not design priorities for urban parks.

While parks do and should contain a variety of components for the pleasure & enjoyment of visitors, the emphasis on individual park elements should be based on the overriding requirements of appropriate land-use patterns.

Examples include the following contentious design issues: Dogs vs. Snowy Plovers; Exotic Plants vs. Native Plants. In the Wilderness Park (Pt. Reyes), Plovers & Native Plants would have priority and areas for Dogs & Exotic Plants would be contained in a few, small, isolated areas only. In the Urban Park (San Francisco) Dogs, Ice-plants & Monterrey Cypress would have priority over Plovers & native plants.

The emphasis in urban parklands would be: recreation, human (& canine) activities with a few, isolated, natural areas interspersed throughout. In the Wilderness Park, the emphasis would be: sustainable natural areas, native plant restoration, and protected habitat with a few, isolated, recreation spots interspersed throughout.

The mission statements of the National Park Service (NPS) & GGNRA address Wilderness and Historical Preservation issues only. The "dna" of these agencies renders them as not an appropriate steward for San Francisco's small and limited urban parklands. Every few years, over the past two decades, the GGNRA develops another policy-ban on dogs. After years of: meetings, studies and policy changes, the issue never goes away. The GGNRA will not allow dogs within their realm.

CONCLUSION: Either the GGNRA comes up with a strict 2-park policy employing proper land-use principles or the San Francisco portion should be returned to the San Francisco Recreation & Park Department for proper care & management.

Sincerely,

Stephen Massey & Patricia Luna-Massey San Francisco, CA 94110;

cc: Sen. Diane Feinstein; Rep. Nancy Pelosi; Hon. Ed Lee, Office of the Mayor; SF Bd. Of Supervisors Land- Use Committee; SF Rec. & Park Dept.; Ocean Beach Dog Group; SF Dog.

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| Correspondence ID: | 3034 | Project: 11759 | Document: 38106 |
| Received: | May,17,2011 16:05:09 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces." | | |

Correspondence ID: 3035 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. I have been a resident in Montara for 14 years and initially moved here because of what the open space on and around Montara Mountain offered. Although I am happy that GGNRA is acquiring this space, I feel it is unfair to impose a ban on dogs as a blanket policy. We are a community of responsible dog owners: leash when necessary, pick up after our dogs, and co-exist peacefully with equestrians, wildlife, bikers and hikers. Please consider that this space is different, and less populated, than most other parks this will impact. There is not a one plan fits all solution, and I hope you will consider providing an alternate plan for this particular space. At minimum I would like to be able to walk my dog on leash; and off leash during less populated hours. If this space is eliminated as an option for dogs, we owners will be forced to walk on streets, where there have been several hit and runs.

Thank you for considering thoughts on this matter.

Best, Lisa Gilmour

Correspondence ID: 3036 **Project:** 11759 **Document:** 38106

Received: May,17,2011 17:21:35

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

Correspondence ID: 3037 **Project:** 11759 **Document:** 38106

Received: May,17,2011 17:35:13

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3038 **Project:** 11759 **Document:** 38106

Received: May,17,2011 17:36:22

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all

action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3039 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Web Form

Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

I am a 33 year old mother, who lives on the beach in Northern California. For most of my life, I have had at least one family dog. They have been part of our family, joining us in almost every outing, from daily beach walks to annual camp outs. They have also been the inspiration to be active in nature, during times I may not have been normally. On days where I may have been lazy or too stressed out, instead, my dogs have urged me to get outdoors, to breathe some fresh air, to appreciate my outdoor surroundings. In our hectic lives, it is these times that help keep us grounded, relieve our daily stresses and therefore allow us to become better people.

Although it has changed in more recent years, during most of my walks, my dogs have been off leash and under my voice control. They have been able to run freely and play, jump in the water, and meet other dogs. It is one of the most enjoyable parts of my day, and surely my dog's. I have met so many other dog walkers in my outings. We all carry poop bags to be sure to clean up after our dogs, and most of us carry litter bags as well, to pick up pieces of trash left by others, who apparently also enjoyed the outdoors, but didn't choose to keep it beautiful and litter free. More times than not, it is the dog walkers that do the majority of litter pickup. When you have a dog that urges you to get out each day (at least once) you become more in tune with nature, and in turn join hands in keeping it clean for others. It is very rare, that I see a dog fight, an aggressive or bothersome dog, or an irresponsible dog owner in my walks.

Closing or limiting the ability to bring dogs on trails, parks, and beaches is a heartbreaking thought. It means you are denying an important ritual, and depressing the psyche for many people. It means more stress, caused by not having the ability to walk easily and accessibly. It means declining health both mentally and physically by not getting daily exercise outdoors. It means less active people outdoors-those who care for our environment because we appreciate it on a daily basis.

I urge you to allow access for dogs and their owners on our beaches, trails and parks for the general health and sanity of our communities. It is crucial to our well being .We all need to be able to enjoy the outdoors with our best companions.

Correspondence ID: 3040 **Project:** 11759 **Document:** 38106

ID:

Received: May,17,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. I have been a resident in Montara for 14 years and initially moved here because of the open space on and around Montara Mountain. Although I am happy that GGNRA is acquiring this space, I feel it is unfair to impose a ban on dogs as a blanket policy. We are a community of responsible dog owners: leash when necessary, pick up after our dogs, and co-exist peacefully with equestrians, wildlife, bikers and hikers. Please consider that this space is different, and less populated, than most other parks this will impact. There is not a one plan fits all solution, and I hope you will consider providing an alternate plan for this space. At minimum I would like to be able to walk my dog on leash; and off leash during less populated hours.

Thank you for considering thoughts on this matter.

Best, David Gilmour

Correspondence ID: 3041 **Project:** 11759 **Document:** 38106

ID:

Received: May,17,2011 18:39:24

Correspondence Type: Web Form

Type:

Correspondence: I'd like to start by asserting that I'm very fond of the Golden Gate National Recreation Area and of Point Reyes National Seashore, and support their it's goals of protecting those areas, including the land and adjacent sea, the animals and the biosphere in as natural a condition as possible, while allowing reasonable access to humans, while protecting the natural environment.

I visit the Monument and Seashore frequently, mostly in Marin County, but also in San Francisco and along the Peninsula. I frequently stroll, hike and picnic there, and occasionally backpack and ride horses there. And I have even bicycled there an rare occasions.

I like the quiet pleasure of observing and enjoying the natural environment and its population of animals on the ground, in the verdure, in the ponds and streams, and in the air, not to mention the scents of flowers and plants.

I am fond of dogs and other pets, but do not believe that they should be in the Monument ans Seashore except in a few places, and under strict on-leash

control, except in carefully designed enclosures. I see, almost every time I'm in the Monument and Seashore, a number of dogs off leash, both in areas where there are lots of people, and on trails and in the wilderness, where they should not be, either on or off leash. I understand that even the scent of dogs and other domestic animals can disturb the natural movement and life of wild animals, including people, even when on leash.

I hear a lot of vehement arguments put forth by people who want the maximum freedom for their pets and themselves, and feel that those people are extremely self-serving me-first-and-always types who care only for themselves. Dogs don't need to be everywhere.

Please consider this as a strong vote for preserving the natural and physical nature of the Monument and Seashore, and the strong restriction of pets, bikes and horses.

Thank you for planning for a balanced usage of these resources, and for eliciting, accepting and taking the time to read and consider everyone's input.

My best regards,

Richard

Correspondence ID: 3042 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs from the park. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas 7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation and a necessity to the well-being of humans and dogs. I am a recent graduate of UC Berkeley that grew up in Montara, CA. My family moved from Simi Valley to Montara when I was young. A huge part of the reason why my family chose to live in Montara has to do with the beautiful open spaces available to recreational use in the area. We are animal and wildlife lovers and so were thrilled that Montara offered us the opportunity to get out in nature with our dogs everyday. Walking on Montara Mountain

with our dogs has provided both us and our dogs with great daily exercise and relief from everyday stress. Exercise is extremely important to me as I have a hip disability and need low impact regular exercise. Walking my dog is motivation to get outside and walk everyday. It also allows my family and I the opportunity to meet other community members and their dogs. I have never witnessed an off-leash dog on the mountain that I considered a nuisance or a danger. Such dogs are kept on leash by their owners so that they do not ruin the outdoor experience for other dogs and their owners. There are baggies and trash cans available to dog walkers that allow them to pick up after their dogs. Community members regularly take the trash home so that the dogs have a minimal impact on wildlife in the area. I feel that there is no factual basis for the move to exclude dogs from these areas. People living near parks typically do so by choice and so have a deep respect for the wilderness. They train their dogs to share this respect and do not allow their dogs to harm wildlife or ecosystems. It is essential that conservation and management plans take into account the interests of all stakeholders involved in an issue. The dog owners make up a significant majority of the stakeholders in this case. We are residents that chose to live where we do largely as a function of the availability of open spaces to us and our dogs. We are also some of the most frequent users of the park. Part of what defines this place to us is the ability to allow our dogs to run freely (as long as they are well behaved) while we hike freely in a place that has long been our home. This measure is in danger of pitting park managers against residents, which could be detrimental to all stakeholders involved in this issue. It is essential that the management of the park is respectful of the needs of neighboring community members because effective conservation requires the help of an entire community. For example: since I was in elementary school, my family, friends and I have engaged in "trail days" to help maintain the open spaces surrounding us and ensure that we have only a positive impact, rather than a negative one. I sincerely hope this measure is not passed. Montara Mountain had a huge role in allowing me to formulate my identity and my heart would break if I could no longer use the park as I have since I was a child. I have a deep respect for this place, as do all residents and we actively maintain the ecosystem rather than harming it. A closer examination of the park and its use by residents would surely reveal my testimony to be true and so I ask that this measure not be passed and that dogs and their owners be allowed to continue to use the park with the same love and respect that we have for years. Thank you.

Correspondence ID: 3043 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open

spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas

7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation

My life wouldn't be as full and rich and wonderful if I didn't have my dogs. Taking them out to hike and run on the beach are the best part of my weekdays and weekends. Please don't take this away from responsible dog owners and their amazing dogs.

Thank you,

K.King

| | | | |
|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 3044 | Project: 11759 | Document: 38106 |
| Received: | May,17,2011 21:02:19 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am strongly opposed to a change in the leash laws and any restrictions on dogs in park areas in Marin or trail areas. I know I voice this same thought with many others who have pets and use the trails and open spaces and parks in a responsible manner. As in any case, sometimes there is a special case, but the vast majority of pet owners in Marin are responsible and the rules need to favor the vast majority of people. thank you. | | |

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|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 3045 | Project: 11759 | Document: 38106 |
| Received: | May,17,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas 7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation. | | |

The San Francisco Bay Area is home to many people who share their lives with dogs. We enjoy the open spaces. That enjoyment is multiplied many fold when our dogs enjoy them with us. Well behaved dogs and owners, who respect and take care of the environment, need access to GGNRA trails and parks. Peaceful coexistence in the park lands is possible.

Correspondence ID: 3046 **Project:** 11759 **Document:** 38106

Received: May,17,2011 21:41:07

Correspondence Type: Web Form

Correspondence: I'm writing with a heavy heart to object to the GGNRA draft dog management plan and other such plans that limit our access to GGNR areas with our dogs. Our family lives in SF, and our dog is a very important member of our family. Off-leash recreation in the beautiful parks and beaches is an important part of our lives - immeasurably contributing to feelings of community and well-being. We have found the vast majority of dogs and dogowners to be respectful of the land and of each other. Restricting access will have profoundly negative effect on our quality of life, and the overall quality of our citizens. I'm deeply concerned that this plan might be implemented.

As a scientist, I find the report fraught with unsubstantiated and ill-considered conclusions. I urge that a reasoned and considered approach to land management be proposed and implement rather than the one offered currently.

Thank you for the opportunity to comment. I hope you take my comments into consideration.

Correspondence ID: 3047 **Project:** 11759 **Document:** 38106

Received: May,18,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

I have spent the last 10 years running nearly always with my dog through the Marina Green and along Crissy Field. This dog has never once set foot on any cordoned-off area or crossed into any out-of-bounds territory. She has also never once been confrontational with any stranger or dog while off leash. In my mind the idea that it improves the habitat and usage of the area to heavily restrict HER is tantamount to the idea that it improves the habitat

and usage of the area to heavily restrict ME.

In my experience, dogs on leash are far more likely to be confrontational with other dogs and with people than dogs off-leash. Most dog owners take this for granted. Putting dogs on leash will do nothing to improve the safety of the area. In my experience, the least safe area for my dog to meet another dog is when both are on-leash on a city street. Don't turn what's left of the dog-friendly territory in the GGNRA into such an unsafe place.

Exercise is a core part of my life. Exercise happens with my dog. My dog is unleashed as much as possible during that exercise. I would likely vote with my feet and leave the city altogether if this plan goes through. And I would advise strongly against anybody I know visiting a GGNRA property ever again. Please reconsider this ill-advised plan.

Correspondence ID: 3048 **Project:** 11759 **Document:** 38106
Received: May,18,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. This especially applies to Fort Funston in San Francisco.

Correspondence ID: 3049 **Project:** 11759 **Document:** 38106
Received: May,18,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful.

Correspondence ID: 3050 **Project:** 11759 **Document:** 38106
Received: May,18,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. I own a year and a half old American Bulldog and know a LOT of people that care about their dog's freedom to run around certian parks without having to worry about what "could" happen or anything like that. My dog is trained by a animal behaviorist thru PETCO in San Mateo, CA. I am a Dog Trainer also and know that this "Ban" is rediculous to me and to my students and especially to my DOG! If people are worried about "vicious dog's" or

anything ridiculous like that, then maybe there should be a sign saying 'off-leash dogs permitted, if you are afraid of being licked to death or dont like having happy wagging tails and drooling faces near you....find another place to walk' sounds silly right? almost as silly as "off leash dogs not allowed because people are afraid of 'potential problems' caused by THE OWNER not following simple rules to lead to a happy and kind dog" I dont think that dogs should get the short end of the 'bone' because they might not have been trained well. most owners know that if thier dog isnt trained properly then they can put the leash on him, or DONT GO TO AN OFF LEASH DOG PARK.

Correspondence ID: 3051 **Project:** 11759 **Document:** 38106

Received: May,18,2011 12:49:16

Correspondence Type: Web Form

Correspondence: The new rulings by the GGNRA regarding limiting friendly dogs and their responsible owners is outrageous and without merit... It is too restrictive! I speak for everyone, esp. disabled seniors...who are very limited as to where they can access recreation areas and get exercise. The terrain is very limiting any way. It is unpresidented to disallow mindful well-behaved people with dogs, who are following the environmental safety issues. Very specfically....do not take away The Mori Point walk-way from our Pacifica Pier, and the off-leash areas of Fort Funston and The Great Highway in S.F. These are only truly accessible for the handicapped, who also need freedom, recreation rights and access without parking hassels and increased stress. The new "proposed rules" are Draconian and totally too harsh. Please modify these plans and keep our freedoms from being crushed. Thank you for reconsidering the benefits to all, they should not be shortsighted and cruel. From Alexandra..who is 64 w/ limited mobility and her grandchildren...Angelina and Sophia, we want to run free with our little non-threatening dogs who are 80% maintained on their leashes....Thank You.

Correspondence ID: 3052 **Project:** 11759 **Document:** 38106

Received: May,18,2011 15:09:47

Correspondence Type: Web Form

Correspondence: I am writing to ask you to please not limit the dog-friendly areas within the GGNRA, especially Fort Funston. Areas where I can exercise with my dog are LIMITED enough as it is! The GGNRA is supposed to be a RECREATION area for ALL Americans. Although almost 50% of Americans own dogs and pay taxes to support the GGNRA, less than 20% of the area is currently available to those of us with dogs, and only 1% available for dogs under voice control. And ALL the proposed alternatives,

based on very a faulty DEIS, propose limiting them even farther!

I am disabled and therefore unable to exercise my dog on a leash. Fort Funston is just about the ONLY place on the peninsula where my dog and I can get the exercise we need. I have never seen problems with dogs there, despite the fact that I am very unstable walking and there are lots of dogs each time I go. The dog owners tend to police themselves as well as their dogs, realizing what a precious resource we have in an off-leash area like Fort Funston. I'd estimate that over 90% of the users of Fort Funston are dog owners. I can't imagine what it would be like if all those dogs were limited to a much smaller area as proposed in the new guidelines. I would no longer be able to take my dog because I cannot get down to the beach area where they would be allowed and the other area is too small and close to the parking lot.

Dogs are like children; they are much better behaved when they get enough exercise. That is very difficult for families in urban areas and even more so for someone with disabilities. PLEASE don't take away the few places where my dog and I can get our needed exercise in a responsible manner. The 1979 option has worked well for years; why cannot it continue to do so? If small modifications are necessary, meet with responsible dog owners to work them out.

I am an environmentalist. I support the EIS PROCESS and protecting wildlife and ecosystems and the efforts at Fort Funston to rehabilitate the dunes. But I do NOT support the draft DEIS for the GGNRA; it doesn't seem to be based on good science or even on good observation. Besides that, Fort Funston was a FORT; there is already huge human environmental impact from it being a fort, and I don't see them talking about removing the concrete bunkers. The paved paths at Fort Funston make it possible for someone like me to walk there, and my dog does no more than leave footprints! Many recreation areas allow trail bikes, motorcycles and horses, all of which leave more environmental damage than dogs.

Please do not limit the off-leash and dog-friendly areas within the GGNRA. THANK YOU for listening.

Correspondence ID: 3053 **Project:** 11759 **Document:** 38106
Received: May,18,2011 15:17:42
Correspondence Type: Web Form
Correspondence: Please reconsider your plan to end off leash dogs areas in the GGNRA. I think if you ever went to any of the GGNRA recreation areas on a regular day, you would see that dogs and dog lovers are your main users. Please consider ticketing people for littering cigarette butts in our parks. Cigarette

butts contain over 4000 chemicals that are toxic to the environment, causing much more damage to wildlife than dogs. Dogs need exercise. It would take very little enforcement on your part to solve any of the problems that dogs actually cause. You could ticket people who don't clean up after their dogs and then use that revenue to pay for other improvements like signs and additional enforcement. There is a much better solution to whatever you are thinking is the problem that dogs cause than just outright banning them. Please consider thinking a little bit. Andrea S. San Francisco native and property tax payer. Major donor to animal rights issues.

Correspondence ID: 3054 **Project:** 11759 **Document:** 38106

Received: May,18,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am a frequent visitor to the area and to Ft. Funston and am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful.

Dog recreational areas are not hazards. In all the times I've been to Ft. Funston, I've never seen an "altercation" - "Altercations" referred to by Park officials. It just doesn't happen. Dog parks are more civilized places of recreation than any other park I've been to. No loud boom boxes, no unruly groups of kids hovering around, no one scoping out the parking lot for purposes of theft. People who use GGRNA are civilized, keep the park well-maintained, clean and SAFE.

The Park Service needs to revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas

7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with and even better than other urban recreation areas.

Thank you for your consideration.

Correspondence ID: 3055 **Project:** 11759 **Document:** 38106

Received: May,18,2011 16:41:02

Correspondence Type: Web Form

Type:

Correspondence: Please keep the lands in the GGNRA dog friendly, by this I mean off-leash. I am a 70 year old woman with two dogs. My exercise consists of walking my dogs off-leash in area where there are no cars. My dogs are well socialized and friendly to all people and dogs. I get great enjoyment seeing my dogs run and play in these areas. A walk with dogs on leash does not give the same benefits to either myself or the dogs. Typically dogs that are on leash are much more aggressive because they feel handicapped. I live in Montara because I love the outdoors and the opportunities it affords me with my dogs. In unincorporated areas most people have dogs. I have been walking on trails in the area for more than 6 yrs. and I attribute my good physical health to the fresh air and exercise I get and I also attribute my good mental health to my quiet times walking and reflecting on nature. Most of the people I meet on the trails have dogs. The people that use the trails should have more consideration than people that don't use them. I clean up after my pets; do horseback riders do the same? Do gophers replace the dirt displaced by them? Those answers are no. These areas under control of the GGNRA are not pristine areas and should not be treated as such. Let those that use these areas have the freedom to enjoy them. The dogs do not harm or dig up these areas and they certainly can't catch the birds. You have not been elected, however, your paycheck comes from the citizens that you wish to take away enjoyment from. In this time when everything is going up in price a peaceful walk which is free is one of the best things in life. Don't take it away please.

Correspondence ID: 3056 **Project:** 11759 **Document:** 38106

Received: May,18,2011 18:08:09

Correspondence Type: Web Form

Correspondence: Dear Sir or Madam: Please do all you can to limit the damage done to bird and other wildlife habitats by dogs on leash and off leash. My experience has been that a very large number of dog owners are irresponsible in managing their animals. National parks and recreation areas should embrace and protect the dwindling natural resources and wildlife. Dog owners needn't be given the right to despoil these rare places. Thank you for your attention to this matter. David A. Gannon

Correspondence ID: 3057 **Project:** 11759 **Document:** 38106

Received: May,18,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. As a recent resident to the area, I was frustrated at how many places had "no dogs allowed" signs. Even on the beaches. It was so disappointing. And then I

found Fort Funston! What a thrill for both of my dogs as well as our family! We could walk the paths, walk up on the "tundra" (I moved from Alaska!), as well as go down to the beach. The freedom to run, walk, play ball, or just sit and look at all of the different breeds of dogs - and owners - has been wonderful. Please do not take this away. There are plenty of places for folks who don't have or like dogs to go, believe me I have seen most of them. Please leave this area as it is. It's works, no need to "fix" it. Thank you so much for your consideration.

Correspondence ID: 3058 **Project:** 11759 **Document:** 38106
Received: May,18,2011 18:23:05
Correspondence Type: Web Form
Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

Correspondence ID: 3059 **Project:** 11759 **Document:** 38106
Received: May,18,2011 18:27:41
Correspondence Type: Web Form
Correspondence: I'd like to commend the GGNRA for putting forth so much effort to provide site prescriptions that address the multitude of concerns a National Park needs to address. I'd also like to commend the GGNRA for the great effort made to engage the public and solicit constructive comments--not an easy task!

I personally, and in no way representing the organization for which I work, offer the following recommendations:

1) No commercial dog walking should be allowed inside the National Parks. If an individual owns more than 3 dogs, then s/he should be granted a special permit to walk them all at once. This opportunity should not be extended to for-profit individuals.

2) At Mori Point, the Pollywog Path should be open to on-leash dogs. The maps in the document show a pond adjacent to the trail; however, this location was not selected during the pond creation project in 2007, creating a larger buffer between this trail and the ponds, which is the area considered the most sensitive habitat. Furthermore, the impact of dog "scents" (urine, feces, body odor) is not introduced to this area by allowing dogs on trails. The yards on the other side of the fence adjacent to this trail house several dogs which release scents constantly.

3) At Sweeney Ridge, I propose that any paved trail that routinely supports

service vehicular traffic allow on-leash dogs. The impact of dogs versus vehicles seems somewhat minute. I wonder what impact vehicular traffic has on surrounding wildlife.

4) I agree that no new off leash dog areas be created inside the GGNRA. In my opinion, off leash dog recreation is a need that should be met by city and county parks.

5) I agree with the document that attempts to create easy to understand/enforce areas for dog-focused recreation and other forms of recreation. This is the only way that the public can understand closures, as the seasonal closures at areas like Ocean Beach and Crissy Field have been so poorly complied with.

6) I agree with the compliance based management described in the plan. Allowing park users opportunities to improve their behavior before more restrictions are placed appears more than fair, and a 75% compliance level is a very generous level to expect.

7) I think that the Pedro Point prescriptions were based on very little information, as the park is currently relatively unfamiliar with the trail systems and resource issues at this site. I propose that the park revoke this prescription and consider the site a "New Land" and follow the prescription provided for such areas.

8) I do not agree with the New Lands prescription, which precludes dogs entirely from New Lands until opened in the Compendium. This puts the Park in a very difficult place when dealing with new communities. I propose that the Park approach the situation in a more realistic way to allow for the Park to make informed decisions without isolating entire communities. In new park lands with unorganized tangles of trail systems, designating "trails" versus "social trails" takes time--let alone determining which designated trails should allow dogs and which shouldn't. Perhaps the language could read something like "Polygons shall be drawn inside new Park lands that designate where dogs are and are not allowed based on the current understanding of sensitive areas. In polygons allowing dogs, on-leash dogs shall be allowed on trail features within those trails, but not in any off trail areas within that polygon." This would be easier to sign and enforce, as many new sites have large numbers of redundant trails that are not worth signing independently AND allows for law enforcement officers and park users to understand which "trails" are allowed and are not.

Correspondence ID: 3060 **Project:** 11759 **Document:** 38106
Received: May,18,2011 18:38:08
Correspondence: Web Form

Type:

Correspondence: Dogs don't like me or maybe the dog can tell that their owner doesn't like me or the way I look. Dogs are always barking at me and I wish that dogs were not allowed in the park at all. I want to see a total ban.

Correspondence ID: 3061 **Project:** 11759 **Document:** 38106

ID:

Received: May,18,2011 19:32:34

Correspondence Type: Web Form

Type:

Correspondence: Hello GGNRA Dog & People Management Powers That Be:

One of the reasons I tell everyone who will listen that the Bay Area is the best place in the world to live is because of its love for dogs who coexist beautifully with all human residents.

Dogs make people better people and our community a better place. Dogs, like people, need to run and be free. This is inarguable.

Please consider Alternative A (the most dog friendly) for all the parks listed in the document.

Thanks for listening.

Annie Sammis

Correspondence ID: 3062 **Project:** 11759 **Document:** 38106

ID:

Received: May,18,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash

recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

This is Golden Gate National Recreation Area which is close to urban areas. The NPS should be making weighing this heavily. Teddy Roosevelt would support dogs in the GGNRA. BTW, I saw 2 of your police officers in The Presidio hiding with a radar gun in a speed trap. They were later seen dining together for lunch on Chestnut Street at the same time! Surely, they have better things to do.

Correspondence ID: 3063 **Project:** 11759 **Document:** 38106
Received: May,18,2011 20:53:04
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3064 **Project:** 11759 **Document:** 38106
Received: May,18,2011 21:44:39
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3065 **Project:** 11759 **Document:** 38106
Received: May,18,2011 22:29:32
Correspondence Type: Web Form
Correspondence: Healthy, happy dogs rarely bite anyone. The ability to enable a dog to run off-leash and play with other dogs contributes to the dog's overall well being, enabling them to contribute to society in all the ways the loving pets provide joy to their owners and others.

For the greatest adherence to the guidelines and policies, certain "leash only" designated areas should have off-leash times like 6-9am and 5pm and later, allowing 9am-5pm for leash only use. One such area is the East Beach of Crissy Field, where dogs and their owners have enjoyed play time for

decades. Who cares if the dogs run free from 6-9am on this part of the beach, when the dog people are the only people who use the beach at this time? Another area would be the fire trails on the Presidio. I have run my dogs on these trails for over 40 years. During 6am-9am, dog owners and their pets make up the majority usage of these trails. Dogs need to run free and be socialized to enable us to coexist without incident. It is cruel to only walk your dog on leash or to force them to exercise at speed that is not comfortable to them.

I imagine there are other areas on your GGNRA map that would benefit from more off-leash designated times during times when only pet owners use those spaces. This is a very heated issue that I have been engaged in my entire life. As a dog owner, I am happy to support a plan that meets everyone's needs, as long as I have assessable places to run and socialize my dogs off-leash. Having actively participated in this debate over the past 2 decades, I am certain that other dog owners will comply if you don't strip them of their ability to use areas like East Beach of Crissy Field during dog walking times i.e. before 9am and after 5pm. We can all get along.

Correspondence ID: 3066 **Project:** 11759 **Document:** 38106

Received: May,18,2011 23:22:21

Correspondence Type: Web Form

Correspondence: I currently live in San Francisco in the SOMA district with my boyfriend and 2 beagles named Beans and Garbonzo.

There are numerous dog owners in the SOMA district. However, there are no legal off-leash parks in the SOMA district, so we make use of the off-leash park at Fort Funston at least once each weekend. This allows Beans & Garbonzo to run around, play with other dogs, check out lots of scents, run through the surf, and just run. My dogs love going to Fort Funston and so do we. My dogs never chase the birds (not even the scary crows) nor do they go into any restricted areas. We have also used Fort Funston as a place for picnics with friends and have been able to bring along our dogs which makes it more enjoyable.

The GGNRA is a National Recreation Area, not a National Park. The mandate for the GGNRA's creation was, according to the legislation that established the GGNRA in 1972, for the "maintenance of needed recreational open space". Off-leash dog walking was acknowledged at the time as one of the traditional recreational uses taking place in the GGNRA when it was created and it is still a past-time of thousands of people in our community.

The GGNRA proposed Dog Management Plan violates the mandate for the

"maintenance of needed recreational open space." Further, off-leash parks constitute only 1% of GGNRA land, and by restricting it further, it will severely compromise our and other dog lover's enjoyment and experience in the park areas. There has to be more space available for off-leash recreation, not less, given the huge demand for it in the San Francisco Bay Area. The impacts of people moving from the GGNRA into city parks is not adequately addressed in the Draft Environmental Impact Statement ("DEIS"). Further, the SOMA district does not have at its disposal in the concrete jungle that it is any city parks that it can adequately convert into an off-leash area to accommodate those affected by the proposed Dog Management Plan. If the open space in the GGNRA further restricts off-leash dogs it will also limite our use of it, which is unacceptable.

Much of the GGNRA land was highly modified by the military when they controlled the land before the GGNRA was created. The GGNRA contains numerous missile silos, artillery batteries, and their assorted support structures. The military planted huge amounts of ice plant to stabilize the sand dunes at Fort Funston and elsewhere. Standards of management that treat much of the GGNRA like "pristine wilderness" are misguided. However, it is fair to expect visitors to treat the area with respect and follow the signs and pick up all pet litter so that there is minimal further impact on the area.

The proposed plan that restricts off-leash dogs on the Chip Trail at Fort Funston does not make any sense as this area is not near the area where the bank swallows nest. If the bank swallow is the basis for restricting dogs in that area, then more attention needs to be paid to the defficits in the DEIS as it does not address the fact that a GGNRA study by researcher Nola Chow has been ignored. Her study showed that that dogs do not distrub the bank swallows.

The DEIS states that it will cost nearly \$1 million to enforce the proposed Dog Management Plan, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal, city and local budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs.

If the GGNRA has \$1 million to spend, it should be using that money instead to update the infrastructure at the park, park benches, toilet areas, etc. the GGNRA should not be using that money to restrict the enjoyment of its patrons.

ID:**Received:** May,19,2011 00:41:58**Correspondence** Web Form**Type:**

Correspondence: I'm writing to oppose the GGNRA draft dog management plan that reduces opportunities to enjoy hiking in open spaces with my good dog companion Luke. Having my dog accompany me on the Coastal Trail makes me feel safe and secure when we encounter homeless denizens of the Trail, take a twilight stroll, or visit the trail during inclement weather and few other people. Sometimes I allow Luke to exercise under voice control and he is very well-behaved while he's sniffing around, meeting and greeting other dogs, and basking under the admiring pets of other walkers of the Trail. Everyone likes him and to hike the Trail under the constraints of his being on a leash at all times would hinder our ability to meet other people and dogs. There would be no reason to go on the Trail if he had to be left at home. AS a homeowner who pays taxes, I don't want to see my tax dollars go towards limiting options to physical exercise and healthier choices, because it's far better to get outside and play rather than sit at home and mope. That's exactly what we would do, Luke and I, since we don't have a car and cannot drive to a park far away that permits a dog to run and frolic with other dogs. Please keep the Coastal Trail a place where I can go with my dog and get away from the stress of the city.

Correspondence 3068 **Project:** 11759 **Document:** 38106**ID:****Received:** May,19,2011 00:00:00**Correspondence** Web Form**Type:**

Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA s

inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an error .

Correspondence ID: 3069 **Project:** 11759 **Document:** 38106

Received: May,19,2011 00:00:00

Correspondence Type: Web Form

Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an error.

Correspondence ID: 3070 **Project:** 11759 **Document:** 38106

Received: May,19,2011 08:12:09

Correspondence Type: Web Form

Correspondence: I support the Doge Management Plan I enjoy walking in the GGNRA I do not think does would run free They need to be controled.

Correspondence ID: 3071 **Project:** 11759 **Document:** 38106

Received: May,19,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 3072 **Project:** 11759 **Document:** 38106

Received: May,19,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: The GGNRA Draft Dog Management Plan is faulty and should not be implemented in any public recreation area, be it federal/state or local. This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special

Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 3073 **Project:** 11759 **Document:** 38106

Received: May,19,2011 12:07:09

Correspondence Type: Web Form

Correspondence: I am a San Francisco resident who happens to have a dog as a member of my family. We take our dog to Baker Beach about 5-6 times a week. In addition our dog trainers take him there several times a week for pack walks. When he is off leash he is under good voice control and within sight at all times. We clean up after him and do not allow him to dig or otherwise disturb wildlife or the ecosystem. Dogs (and people) that are adequately socialized are usually happier and healthier. Baker Beach offers city dwellers the opportunity to allow their dogs to socialize and run in a safe environment. We are respectful of the ecological sensitivity of the area. It has been my experience that caretakers of animals are usually more aware of their environment and the environments' potential effect on the health and well being of their animals. As a result they tend to be more cognizant of how their behavior(s) may effect the environment and take greater care to have minimal environmental impact. I for one think those annoying "Go-Cars" (i.e., two seated motor-scooters) should be banned from Baker Beach, all GGNRA land and residential areas. Their noise polluting, obnoxiously loud. recorded self tours auditorily assault everyone. Please continue to allow dogs to be exercised both on and off leash in GGNRA areas. Dog walkers provide a valuable service and should not bear an unfair burden of fees and taxes. There are enough restrictions in place already. Please do not add more. Sincerely, Richard Dunckel

Correspondence ID: 3074 **Project:** 11759 **Document:** 38106

Received: May,19,2011 12:19:41

Correspondence Type: Web Form

Correspondence: Hello:

I've read the executive summary, and scanned the EIR.

PLEASE just keep the regulations as they currently are, and use whatever resources available to better enforce existing law. If some stricter permits for "commercial" dog walkers are warranted, I'd support that much. But otherwise, the proposed changes strike me as unnecessary.

Respectfully,

SH

Correspondence ID: 3075 **Project:** 11759 **Document:** 38106
Received: May,19,2011 13:02:04
Correspondence Type: Web Form
Correspondence: After reviewing the GGNRA Draft Dog Mangement Plan/ EIS, I find the NPS alternatives too restrictive with respect to off-leash dog recreation, and are therefore unacceptable. As a member of the Nature Conservancy, park user, taxpayer and stakeholder , I strongly urge the NPS to work with the representatives of SFSPCA and Eco-Dog as equal partners in developing a management plan that is balanced, progressive, and forward thinking. Thank you.

Correspondence ID: 3076 **Project:** 11759 **Document:** 38106
Received: May,19,2011 14:35:10
Correspondence Type: Web Form
Correspondence: There are already only a few locations we can take our dogs, most people are responsible and clean up after our dogs and stop them from hindering other park users. By actioning theses plans you are going to make a lot of people and dogs unhappy, yes there are dog parks, but dogs dont get the same exercise there as they do at these other locations. Please reconsider and help keep us active and enjoying the area we live in with our dogs.

Correspondence ID: 3077 **Project:** 11759 **Document:** 38106
Received: May,19,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 16, 2011 Dear National Park Service, I am writing to you on behalf of the American Society for the Prevention of Cruelty to Animals (ASPCA) and our 1.5 million members and donors in the United States. Our organization has concerns about the Draft Dog Management Plan

Environmental Impact Statement, and in particular the preferred alternative that is set forth in this plan. The following comments summarize our concerns. The preferred alternative includes only one fully enclosed off-leash dog play area (or as referred to in the plan, a "regulated off-leash area"). This sole fully enclosed off-leash dog play area in the preferred alternative was the product of a multi-year negotiated rulemaking process between off-leash advocates, environmentalists, and other user groups. Yet despite this being the sole point of consensus across these diverse groups, the National Park Service has not attempted to provide additional enclosed off-leash play areas anywhere else in the GGNRA: all the remaining areas proposed for off-leash dog play are not enclosed. The ASPCA supports the development of dog parks. However, we believe it is imperative to have secure fencing and gates. It is also best if the park enclosure incorporates double gates or an interior "holding pen" at the entrance, so people and their dogs can enter and exit without accidentally letting other dogs slip out of the park. In the absence of physical barriers around an off-leash dog play areas, dogs may be lost, injured or killed. This is why a cornerstone of good off-leash park design is to enclose the area: not merely for the protection of other users, but also for the safety of our dogs. As mentioned in the proposed plan, dogs continue to be lost, injured or killed at the GGNRA because the off-leash areas at the Park presently are not enclosed. A simple enclosure would remedy this problem, while ensuring that all park users get to choose the kind of experience they desire by choosing to either enter, or not, these fully enclosed areas. Outside of these enclosed areas, our organization supports the enforcement of leash laws in general because such laws provide important safeguards for people, our pets, wildlife, and parks. Enforcement of the National Park System's leash law and the creation of enclosed off leash play areas for dogs would insure dogs have reasonable access to the Park without jeopardizing the safety of anyone. If you have any questions or concerns regarding this letter, please do not hesitate to contact me. Sincerely,

Jill A. Buckley, Esq. Senior Director Government Relations & Mediation
Training P.O. Box 48 Pismo Beach, CA 93448 www.asPCA.org

Correspondence ID: 3078 **Project:** 11759 **Document:** 38106

Received: May,19,2011 16:48:17

Correspondence Type: Web Form

Correspondence: I do not support the GGNRA plan to severely limit off-leash exercise & play. It does not make sense from an environmental or public safety perspective and will ruin an incredible resource now available to dog owners. The problems caused by off-leash dogs are over stated & the proposed solution is overly punitive to the majority of dogs & dog owners who act responsibly. Please scrap this ill conceived plan.

Correspondence ID: 3079 **Project:** 11759 **Document:** 38106

Received: May,19,2011 17:02:05

Correspondence Type: Web Form

Correspondence: The news media has been highlighting the protests of dog owners regarding possible changes to off-leash access. I can't tell if you are hearing from anyone else. I have raised two children in San Francisco, and while I have never owned a dog, due mostly to landlord issues, I worked and volunteered in animal shelters and pet hospitals for more than ten years before my children were born. I am not a dog-hater. However, I am a mother and an environmentalist, and my attitude towards off-leash dogs is formed by those two considerations.

My experience with off-leash dogs has occurred mostly in San Francisco and in the Tennessee Valley area. I have never been bitten, but one of my children has. In the neck. The dog was just playing, but it was very big and the child was very small. The owner was not in control. I have no serious safety concerns now that the children are grown, but when they were small, it was a constant concern, whenever they were in a park, to protect them from dogs. Carrying them in backpacks was not always helpful, as some dogs took exception to what they seemed to view as a threatening two-headed monster. Owners would calmly explain that their huge, barking dog was "friendly." There were also numerous encounters between unsuspecting children and dog poop. All these incidents occurred in areas where dogs were required to be leashed at all times.

What I'm getting at is that enforcement has got to work or there's no point in having any rules at all. It may be necessary to ban dogs from sensitive areas if people can't be induced to keep them on a leash. I almost never saw a leashed dog in Tennessee Valley; owners would carry a leash to put on if a ranger showed up, but they were pretty certain not to get caught out on the trails. I was always amazed that they did this, considering the risk of the dog coming back covered with poison oak. I think people have gotten used to being able to let their dogs loose in wild areas, and it's going to be hard for them to change. I hope there is some way to make it happen, because we have to share these areas with each other and with the wildlife that was here before we came.

Correspondence ID: 3080 **Project:** 11759 **Document:** 38106

Received: May,19,2011 17:03:18

Correspondence Type: Web Form

Correspondence: Thank you for your hard work and consideration of the many viewpoints

related to allowing dogs in Golden Gate National Recreation Area. I visit Golden Gate NRA and other national park lands frequently and cherish our National Park System as a treasure for all Americans to enjoy.

I would like to point out the importance of Golden Gate National Recreation Area to the many children who live in San Francisco and the Greater Bay Area and how their use of the park is impacted by dogs. The importance of children having access to open space and nature has been written about extensively in the past several years, most notably in the book "Last Child in the Woods" by Richard Louv. Mr. Louv details the many important benefits that children gain from exposure to and experiences in nature.

For many, many of the children in the San Francisco Bay Area, Golden Gate NRA provides one of the only chances they have to experience nature. Unfortunately -- as I have witnessed countless times -- these experiences are too frequently disrupted when children encounter dogs. I have seen both on-leash and off-leash dogs jump on children, bark at children, lunge at children, and even take food out of the hands of children. This type of encounter can taint a young person's view of nature and of their National Parks for years ? if not decades ? to come.

While I think the preferred alternatives presented in the dog management plan will help decrease the number of disruptive encounters that children have with dogs, I believe there is still room for improvement in this area. Specifically, it appears that there are several park areas where there aren't any trails that will be "dog-free." An example of this is Crissy Field; the preferred alternative calls for a beach area that doesn't allow for dogs but it seems that all the pathways leading to that beach do allow for dogs. I would support some access points that would allow families to reach the beach without having to deal with dogs.

I believe that there should be some trails and/or paths that do not allow dogs (on-leash or off) in each area of the park. The park is a shared resource and adults who do not wish to encounter dogs and/or do not want their children to encounter dogs during their park visits should have that opportunity.

With the small exception of designating a few more trails and paths where dogs are not allowed, I support the general balance between on-leash, ROLA and dog-free areas in the preferred alternatives. Thank you.

Correspondence ID: 3081 **Project:** 11759 **Document:** 38106
Received: May,19,2011 17:46:27
Correspondence Type: Web Form
Correspondence: Please excuse my brevity:

The entire process, though well intentioned, is tedious and a waste of community resources.

I am a "superuser" of many GGNRA areas, primarily on foot and by bike, and have had extended periods of use both as a dog owner and non-dog owner.

Like most reasonable people, I see both sides of the issue: I greatly enjoyed having the ability to bring my dog with me on my outings in the GGNRA, but have been bothered and inconvenienced by plenty of dog owners in the very same places.

Fundamentally, the problem comes down to ineffective enforcement of existing laws. Anyone who uses the GGNRA on a regular basis sees many dogs clearly not under "voice control" even under the most generous interpretation of the phrase. Dog owners who would be appalled to find animal feces on the sidewalk outside their house find it completely acceptable to let their dog go just about anywhere without proper cleanup.

If all owners knew that there was the real and probable threat of enforcement of laws already on the books, people who could not reliably control their dogs would cease to burden the GGNRA with their presence, and just about every piece of poop would get picked up.

I do not question the effectiveness (ok, I guess I do) of law enforcement in the GGNRA. As I said, I use one unit or another of the system nearly every day of the week, but could count on one hand the number of LEOs I see outside of their patrol cars in one year.

Enforce the laws we have. Let owners know that they will be cited and fined if they cannot call their nuisance dog to heel when asked to do so by a LEO. Have LEO's writing tickets, publicly and visibly, in high-use areas (crissy field, etc.) for failure to clean up poop.

Right now, the situation fails because the threat of enforcement is not credible, not for lack of existing laws.

Correspondence ID: 3082 **Project:** 11759 **Document:** 38106
Received: May,19,2011 20:31:57
Correspondence Type: Web Form
Correspondence: The proposal goes much further than is necessary. I would be happy to consider some reasonable changes that are supported by evidence. As a dog guardian who uses the GGNRA, I am open to changes that may provide a

benefit to some users without going too far in hurting others. This is not such a plan. It seems to be based more upon some anti-dog prejudice than upon reason and fairness.

I live right near a San Francisco public park and it already has about as many dogs in it at popular times as it can contain. This proposal would push my city park to overflowing with dogs and their guardians, while GGNRA space goes wasted and empty. We have a limited amount of open space in the Bay area and we should be able to use what we have. Extreme restrictions for no good reasons would cause the GGNRA to be of considerably less value to the people of the area. Why waste these lands? Let's have reasonable uses of them instead.

Please reconsider this proposal beginning with the current usage and suggesting modifications to that usage based upon facts and reason. I'm sure that a new proposal that is fair and wise would be well received. I don't insist upon things being left exactly as they are; I'm willing to compromise. I'm not willing to be marginalized for its own sake.

Be reasonable, and I will be too.

Thank you very much.

Clifton Stone San Francisco

Correspondence ID: 3083 **Project:** 11759 **Document:** 38106

Received: May,19,2011 23:38:57

Correspondence Type: Web Form

Correspondence: As a resident of San Francisco, I have seen the damage people have made along the Great Highway. This includes people who do not pick up after their dogs and people who litter and leave trash along the curbs. Should we disallow people to use the beach and walkways? I frequent Fort Funston regularly - a wonderful place where you can walk with your dogs in a safe environment leash free. There are very few places you can do that. I have heard your staff say that they think Fort Funston has been destroyed from the dogs. If you walk around Fort Funston, you can see that it is the wind, sand and weather that has changed the landscape - NOT the dogs. I would like to see the Ocean Beach from Sloat to Lincoln to be leash free also. I don't believe that dogs pose a problem for them at all. I don't know who has done your '10' year study, but I cannot believe that the stretch of Ocean Beach will be the demise of the Snowy Plover.

Correspondence ID: 3084 **Project:** 11759 **Document:** 38106

Received: May,19,2011 23:57:32

Correspondence Web Form

Type:

Correspondence: As a photographer, I visit Ocean Beach at least 50 times per year, where I have observed first-hand the damaging impact of dogs on this area's wildlife and environment. On almost every visit I observe several dog owners allowing their off-leash dogs to run freely through the Snowy Plover protection areas, which are clearly marked as areas closed to dogs. The owners often allow or encourage their dogs to chase the sea-birds. The dogs unleashed also roam the littoral areas, which the plovers use for nesting as explained on signs throughout the area. A few times I have politely asked dog-owners to leash their dogs but this is nearly always met with hostility. In all the years I have visited Ocean Beach I have never seen any officials enforce the limitations on dogs. It is obvious that stronger regulations and enforcement are needed. There are miles of Ocean Beach where leashed dogs are permitted, but many dog owners obviously feel they should be able to take their dogs anywhere, usually unleashed, despite endangered species, laws, and the rights of others who want to enjoy GGNRA lands without interacting with domestic animals. If we must have "off-leash areas" they should be fenced off to protect people, dogs, and habitat. I also agree with those asking for full compliance, and a ban on commercial dog-walking (which is already supposed to be illegal).

I know dog-owners are a vociferously organized group. They threaten mass demonstrations to "show us what it will be like" if their animals are banned from a few public areas. You have surely received many letters from them. I hope you will consider the rights and concerns of those of us who are not part of some organized pressure group, but care about the GGNRA and its mandate to protect wildlife habitat. We all deserve recreational opportunities as much as that small minority of visitors who choose to bring their domesticated animals onto our wonderful GGNRA lands. Thank you for your attention.

Correspondence ID: 3085 **Project:** 11759 **Document:** 38106

Received: May,19,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to:

- 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas

- 7 Justify any changes with objective, reasonable scientific studies and

findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation Example Personal Story to Add (it doesn't have to be long): I am a disabled senior, with grandchildren, that lives in Oklahoma and want more parks in America to accommodate well-behaved dogs and their families, particularly parks with long hiking trails. We travel with our dog and grandchildren and can't go places that don't allow dogs so we certainly don't go to the typical National Parks. It is horrible that so few parks allow dogs on hiking trails when dogs make so many of us happier and get us out to exercise on a daily basis. Almost all people with dogs control and pick-up after their dogs and walking with our dogs is good exercise and makes us and our dogs healthier and safer. On the whole, I find family dogs to be far better behaved than people and have seen no serious safety issue with a well exercised, socialized, and trained dog. This plan only makes it more difficult for people to responsibly care for their dogs and themselves.

Correspondence ID: 3086 **Project:** 11759 **Document:** 38106
Received: May,20,2011 00:17:03
Correspondence Type: Web Form
Correspondence: Hello Park Folks.

I am a Pacifica resident and regular recreationalist at Mori Point, Milagra Ridge, and Sweeney Ridge.

I have attended several Pacifica/GGNP Liaison Committee meetings and read thier letter of recomendations to GGNP's DEIS regarding future pet management. Additionally I scoped out the GGNP two volume DEIS at our local library.

I believe that the GGNP DEIS prefferred alternative "C" is a reasonable and balanced alternative for Pacifica's National Parks. I feel strongly about protecting natural, and cultural resources with wildlife getting the benefit of any doubt regarding pet disturbances.

Having had the opportunity to grow with the restoration/transformation of Pacifica's National Parks, I regard these parks to be wildlife sanctuary's for many migratory and sedentary species.

Historically a Noel Blincoe, Paul Jones and I were the initiators of the Pacifica/GGNP Liasison Committee. I continued as a participant for some years following.

A final note.....I disagree with the P/GGNPLC's recomendation for the

Mori Point Timigtac Trail to be a dog walking trail. It is very narrow, a foot path and people walking in opposite directions require one or the other to move to the side. It is currently used much by coyotes and is lined by purple needle grass (ca. state grass). The coastal prairie, and scrub habitats where it is located are host to much biodiversity. Flocks of meadow larks, and a solitary singer are an occasional favorite of mine.

Much of the character of the Timigtac Trail, if one might imagine, is like it might have been when the Ohlone "Muwekma" people walked the ridgeline toward the oak groves to the east in the fall.

For Pacifica's National Parks.....Alternative "C" Please.

Thank You

Respectfully

Ron Maykel

Correspondence ID: 3087 **Project:** 11759 **Document:** 38106

Received: May,20,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean:

I am writing regarding the draft Dog Management Plan and Environmental Impact Statement for the GGNRA. I would like to use and enjoy the GGNRA lands. I have resided in San Francisco since 1981. I no longer go to the Crissy Fields/GGNRA area as it is overrun by dogs and dog owners. It is very clear that a person out to enjoy and observe nature is not able to relax and enjoy the park area. It is necessary constantly to get out of the way of the dogs. The owners leave the dogs off leash. The dogs run wild; the owners go to the shore for a social outing. I have gone there with friends who are dog owners. I grew up with pet dogs. I used to love dogs. The situation in our parks and in this urban area has become intolerable. I do not wish to go to a beautiful natural setting to watch dogs defecate, to see them chase the few shorebirds left, to have to avoid them as they run wild. Animal and plant life of the area are obviously endangered by the dogs' waste. The park lands are a "public convenience" for dog owners who feel they are in a natural setting, that their dogs are part of it, and that they are released from responsibility.

Years ago, it was considered polite for smokers to ask if others "minded" if they smoked. It was thought rude to say, "yes;" everyone had to breathe the second hand smoke. I believe we face a similar situation with the pressure

group of dog owners now. A small, well-organized pressure group is able to exert force on the general public. I am saddened to think that a decision will be made according to how many letters or comments you receive on one side versus another. A group with a focus and organization will always make a bigger noise than the general public, which takes a while to bestir itself. It worked for smokers for decades.

I would also like to share with you the truth about the "voice control" myth. On three occasions, I have narrowly missed hitting a dog with my car near the GGNRA and the Marina. This does not include my visits to Ocean Beach or Alta Plaza Park near my apartment. Twice the owners did not even realize that the dog was running in traffic because the owner was busy chatting with other owners. They then started yelling for the dog. The dog, being a dog, kept running. The other time, the owner ran into traffic while calling for the dog. The dog kept changing directions to get away. The owner told me that she always had her dog under voice control! It was extremely upsetting to be forced to steer around the human and the dog wondering how I managed not to be killed by other cars while saving the dog's life.

I feel that it is a great loss in my life not to be able to use the parks with the frequency or freedom of the dogs. I chose to live in this place because of my desire to be close to nature and yet I'm the one being fenced in.

I strongly encourage you to adopt the plan and consider improving it by implementing the following steps: ? All "Regulated Off-leash Areas" should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. Fences provide security for all park users and create clear boundaries so that dog owners are aware of how to comply with park rules. I have ONLY ONCE seen someone with a dog on a leash at Ocean Beach. The dogs do not know about limitations and the owners do not care. An "in your face" attitude has developed which seems to flaunt itself and dare people to say anything. Of course, no one says anything. It is very intimidating to try to speak to someone who has dogs running wild. ? The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance. ? Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it. It is a convenience for the dog-walkers--one of the most beautiful spots on earth an open porta-potty. ? At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, and those dogs are rarely on a leash. This means no trails are available for people who prefer to enjoy the outdoors without interacting with dogs and often being forced off the path by the dog. ? Pets are important to some families and communities, but dogs are just one animal

that is having a significant negative impact on thousands of other animals and plants, and on many other human visitors. Dogs, no matter how loveable, are not a natural part of the GGNRA ecosystem. The parks should be safe and accessible for all users and protect their natural and cultural resources for the future.

Finally, I must comment on what I have read to be the plan of the off-leash agitators. Their plan is to take their dogs, off leash, into the streets in a "poop in." They intend to make the streets and sidewalks so disgusting that everyone will have to let them have their way. These are the actions of self-indulgent bullies. Only two-year-olds can do that with impunity. The future of a delicate ecosystem like that of the plants and animals of the GGNRA should not be decided in order to appease self-indulgent bullies. I have heard a lot about the dogs' need for great freedom. People who live in an urban area and choose to own dogs should not then impose on everyone else's freedom to enable them to do what they like with their pets. I would like to see the shorebirds back on the beaches in the numbers they used to have. I would like to feel as though I had as much right to walk or run on the beach as my neighbors' dogs. However, I do not have that right. I cannot take visitors to GGNRA. They don't get to run free with the wind in their hair, but the dogs do.

Thank you for the opportunity to comment on the Dog Management Plan. Please continue to be a good steward for the parklands and the myriad life forms that live there.

Correspondence ID: 3088 **Project:** 11759 **Document:** 38106

Received: May,20,2011 09:15:20

Correspondence Type: Web Form

Correspondence: Dear Sir, I am writing to express my profound surprise and disappointment with the proposed changes to the Fort Funston recreational area. Both of the access trails to the beach require a high level of fitness and mobility. Because the new plan restricts off leash activities exclusively to the beach, and a small section on the bluff it essentially takes away the opportunity for the elderly or disabled to let their dogs run free. I would also like to point out that there are many times at high tide when there is simply no beach. I also find it curious that part of the reasoning was concern for safety on the cliff, yet the only trail that would remain open to unleashed dogs (the sunset trail) is the very trail where accidents are most likely to occur. Finally, I am sure that most of the local electorate would agree that the 1.5 million dollars required to police the changes could (and should) be spent on more worthy projects. I have been a regular user of the park for four years and can attest that it is used in an overwhelmingly responsible manner and is integral to the lives of many of its visitors. Please reconsider this proposal.

Correspondence ID: 3089 **Project:** 11759 **Document:** 38106

ID:

Received: May,20,2011 09:55:17

Correspondence Type: Web Form

Type:

Correspondence: dogs have accompanied humans into the wilderness since before this country was founded. Your continued waste of resources to limit and restrict both humans and their best friends, dogs is wasteful. how long before you start requiring humans be on leash at the hands of 'staff' to promote your supposed goals? Why not completely restrict access like the state parks propose by 'closing' these areas in the name of your supposed 'goals' or maybe even budgetary constraints? Apparently you are top heavy in 'administration' and we need to cut back your wasteful use of resources by attempting to continually restrict use of this country's natural resources in the name of your 'goals'? You people dont work for the public, you are starting a war against us, and a way of life older than this once great country. Your beaurocracy is a black mark on all americans as you continually strive to eliminate our basic tenant-"the land of the free" The land of beaurocracy is more like it. I am embarrassed to include you and your staff in the group we call Americans. Stop your wasteful restrictions and allow us to practice human decency on our own. We dont need to pay your ridiculous salaries and pensions so you can eventually put us all in a corral as you lead us to slaughter our American Freedoms. The power of the people will ultimately prevail, and our best friends will be there with us-dogs. And you and your staff will be evicted, not us. STOP with the regulations!!!

Correspondence ID: 3090 **Project:** 11759 **Document:** 38106

ID:

Received: May,20,2011 10:56:15

Correspondence Type: Web Form

Type:

Correspondence: I encountered a number of off leash dogs at ocean beach in an area that is supposed to be on leash this morning. It significantly decreased that enjoyment of my walk. I had a number of dogs run up to me and interfere with my walk with no apologies from the owners. They seemed to think I would like their dogs to interact with me. I did not complain to them because I have not had success with talking to owners before. In the past, I have had responses that ranged from anger to denial. Owners often claim they do not know that area is on leash but I have seen these people again even after having told them before. I really believe that off leash areas need to be enclosed by some kind of physical barrier. This way there will be no confusion or claimed confusion. The amount of area that will be off leash in the preferred alternative is in my opinion too much but if this area is fenced off than it would be ok.

Correspondence ID: 3091 **Project:** 11759 **Document:** 38106
Received: May,20,2011 11:43:42
Correspondence Type: Web Form
Correspondence: I am very concerned that dogs be restricted from entering sensitive natural areas. Pets need to be restricted if we are to save what's left of our natural heritage.

Thanks for your efforts and wise decisions.

Correspondence ID: 3092 **Project:** 11759 **Document:** 38106
Received: May,20,2011 12:18:14
Correspondence Type: Web Form
Correspondence: I am a private citizen who does not have a dog, and I support staying with the "Alternative A: No Action, continuation of existing management" proposal.

Living in a city means density. People don't have yards for their dogs to run free. And dogs need exercise. Our parks are our back yards and the designated areas where dogs can run free are precious and few.

City dogs are well socialized because they're allowed everywhere. This access trains them to be calmer than those isolated from humans' daily life. They're the most well-behaved canines I've ever encountered.

My husband and I often go to Crissy Field and walk on the beach and by the field, just to see and pet the happy dogs we find there.

NPS regulations might be appropriate in rural destinations, but in an urban park, they need the flexibility to alter the rules. GGNRA is used differently than Yellowstone, Yosemite or Mt. Rushmore. That needs to be taken into account as does the original agreement from 1972.

I urge you to approve Alternative A. This kind of regulation sets San Francisco apart from everywhere else in the country. San Franciscans believe in diversity, freedom, happiness. Alternative A represents those beliefs.

Correspondence ID: 3093 **Project:** 11759 **Document:** 38106
Received: May,20,2011 13:56:33
Correspondence Type: Web Form

Type:

Correspondence: Your preferred dog plan is needlessly restrictive and will cause a hardship to many thousands of dog owners in the Bay Area. Studies show that dogs on the beach do not disturb birds any more than do humans. You need to keep all people on approved paths to the beaches, rather than single out people with dogs.

Correspondence ID: 3094 **Project:** 11759 **Document:** 38106

Received: May,20,2011 14:25:49

Correspondence Type: Web Form

Type:

Correspondence: This comment pertains to Fort Funston specifically, a place of delight and emotional restoration for the two- and four-legged members of my family.

An environmental impact assessment evaluates the impact of an activity on an idealized native "wild" ecosystem, but may not adequately capture the effects of an action on a less romanticized, but ultimately more realistic, urban ecosystem. We tend to view non-native people and animals as spoilers of otherwise balanced natural systems, and with good reason, for many natural treasures have been irreversibly lost due to the shortsightedness that often accompanies human progress (Hetch Hetchy, thousands of acres of old growth redwood forest immediately come to mind). The beach at Fort Funston might arguably be one of those places, except that by banning or drastically restricting off-leash dog access, this beach and the land leading to it will not return to a more perfect state of natural-ness--a pristine state is unobtainable. The beach is located on the coast of one of the most densely human and dog populated areas on the West coast. Environmentalists with realistic visions for the coexistence of humans and the rest of the non-human biosphere have long advocated for dense urban living, so that the human footprint can be managed and contained in controlled areas. Fort Funston lies fully within an urban zone, in the county of San Francisco. The beach is strewn with plastic detritus and all types of man-made litter, and large concrete structures, drainage systems, and other feats of human engineering mean that this place will never return to its former unadulterated state, regardless of how many dogs and people no longer visit. Those dogs and people will find other outlets for outdoor recreation, perhaps, but it is reasonable to assume that the health and vitality of those animals will be adversely affected by the lack of access to an area that was once very much part of their "native" habitat. Denying people and their pets the opportunity to enjoy this ecologically imperfect, but perfectly exhilarating recreational area could have the perverse effect of increasing encroachment on other less spoiled natural areas, increasing ecosystem harm on areas that are better candidates for full draconian restricted access, as these two- and four-legged "invasive species" seek other places to enjoy nature and each other. Depending on implementation, zoned restrictions could have nearly the

same negative habitat impacts to the human and dog inhabitants of this urban zone as a full-on ban would. On behalf of the four primate and canine members of my family and the friends we encounter at Ft. Funston, we ask you to consider the impact the proposed restrictions would have on our emotional and physical vitality, and to preserve one of the activities that sets San Francisco apart as an area where common courtesy and sense are allowed to triumph over proscriptive and restrictive laws and regulations.

Correspondence ID: 3095 **Project:** 11759 **Document:** 38106

Received: May,20,2011 15:13:58

Correspondence Type: Web Form

Correspondence: Dear National Park Service,

I was very pleased to have the opportunity to review your proposals and to speak with employees regarding the proposed changes to the rules allowing dog owners to bring their animals into the GGNRA. I was a member of the Mill Valley School District Board of Governors for four years and I understand how difficult it is to formulate rules in the midst of competing points of view. What I always found was that it is important to separate out the loudest voices from the objective basis for any decision, and I believe that the Park Service has made a good start in moving in that direction. For the record, I am a dog owner and I do use as much of the open space in the Bay Area as I can both alone and with my dog and I have a very personal interest in any changes to the current rules.

SUMMARY:

I believe your proposed rules are vastly too restrictive. I believe that instead you should follow the following three principals:

(1) On lease dog walking should be allowed in the vast majority of areas -- with a very limited area designated for people who don't even want on least dogs in the same area; (2) Off leash dogs be allowed anywhere that their presence is not likely to cause material environmental damage (such as beaches), with limited portions of those areas (or times) being designated "no off leash dog" to accommodate people who don't want to be faced with off leash dogs; (3) Certain accommodations be made to create "off leash" space in what otherwise might be environmentally at risk by, for example fencing in specific areas -- albeit areas that are large enough to allow a dog to run; and (4) limitations for professional dog walkers that are more restrictive during high use periods (summer day times) and less restricted at other times (early mornings, rainy days, winter weekdays, etc.) -- for example allowing only 3 dogs per professional during summer days and 6

dogs per professional at other times (with appropriate permits).

DISCUSSION:

I believe that if we can craft a set of rules that are backed by compelling logic, dog owning users and dog-less users of the GGNRA will be able to understand, follow and, most importantly, self-enforce those rules. I guarantee you that if dog owners understand that their ability to use the GGNRA can be restricted if more than 25% of dog owners violate the policies, those dog owners will become assertive enforcers of the rules.

I think it made a lot of sense the way you have divided the analysis into a set of rules for commercial uses (professional dog walkers), off-leash uses, on-leash uses and no dog areas. It's logical to me that the rules related to commercial uses would be most restrictive, the rules related to off-leash uses would be slightly less restrictive, and the rules related to on-leash uses would be the most unrestricted. However, I'm not sure that I completely understood the basis the Park Service used for drawing the lines for each of the four use cases -- Particularly given that the vast majority of space is being placed off limits even for on-leash dogs.

SPECIFIC THOUGHTS ON THE RULES AND THEIR LOGICAL UNDERPINNINGS:

First, the argument that many of your employees made ("no other Park Service land allows any dogs") is not at all compelling. This is a roll back of previous rules, and I think you need to apply a more convincing argument than "the Park Service is illogical everywhere".

ON-LEASH DOG RESTRICTIONS. As I said above, I think that restrictions of on-leash dog access should be extremely limited (and I note that many of your proposals make very significant reductions in dog owners' right to access the GGNRA with their animals). I have seen no scientific studies that show that on-leash dogs do any more harm to the environment than human beings do if they actually stay on-leash, follow the rules about trails and pick up waste. As a result, I believe that any decision to prohibit on-leash uses of the GGNRA needs to be justified on some basis other than environmental harm. The only basis I can see for the restriction (assuming there is no environmental issue) is to accommodate users who wish to have access to a dog-free area. That goal can be accommodated by having specific limited areas designated as "dog-free" (much the same way as limited areas might be designated "off-leash"), while the vast majority of the GGNRA would continue to allow on-leash uses. (See below for more discussion of "dog-free" access".)

The proposals I saw, however, make enormous reductions in the amount of

space that may be accessed by dog owners who keep their dogs on-leash ? with no apparent justification for that change. (I heard some people argue that dog owners will violate the rules of on-leash spaces and let their dog off-leash ? but I don't think that's an argument for restricting on-leash use further, it's an argument for greater enforcement and penalties.)

***** My suggestion would be to have a global rule that, except in specific, designated "no dog" areas, on-leash dogs would be allowed in all the GGNRA.

OFF-LEASH DOG RESTRICTIONS. I understand the need for more restrictive rules limiting the areas that can be accessed by dogs that are allowed off-leash. I'm sure there are many places where the environmental harm done by a dog that has run far off the path could be material. However, I believe that it is important in our community for dog owners to have a place where their dogs can run free, romp and play. That's good for the dog's health, good for the owners health, and plain fun.

***** My suggestion would be that, subject to a limited area designated dog-free, I would designate the vast majority of places where dogs cannot do any material environmental damage "off-leash" (clearly this would exclude some of the GGNRA (the environmentally sensitive part), but I'd hope that exclusion would be applied sparingly and only where there was a compelling argument of environmental necessity). My impression is that this would include most of the beaches, any area with fencing sufficient to protect sensitive areas and a great deal of the other open space.

If you conclude that a large number of users of those spaces would object to off-leash dogs playing in the same space, you might consider different restrictions depending upon the time of day. In South Carolina, where my father lives, the national seashore allows dogs on the beaches all day long in the winter months and before 10 AM and after 7 PM in the summer months. I'm sure a similar program could be implemented for some of the beaches around here.

COMMERCIAL DOG WALKERS. As I said above, I agree that restrictions on commercial dog walkers should be greater than the restrictions on non-commercial users of the GGNRA. However, it is important to note that commercial dog walkers are not making money off of the public space in the same way as other commercial ventures might. They are making the same use as the dog's owner does, and they are serving the community purpose of exercising the dogs, and teaching them to behave and get along with other dogs. Moreover, if we restrict commercial dog walkers too much, the result will be a significant impact on whatever smaller number of venues there are where they are allowed to go.

To be more specific, I think some restriction on the number of dogs the average commercial dog walker may accompany is fine (although I'm not sure why 3 dogs should be that number). (I do very much appreciate the proposals to allow professional dog walkers to obtain permits to walk more dogs.) I also think that time based restrictions on commercial dog walkers may make sense in many places -- possibly with more dogs allowed during off hours (early mornings, rainy days, winter week days).

***** My suggestion would be to allow professional dog walkers to use any on-leash or off-leash areas with up to 3 dogs (or a higher number if possible) at any time private citizens could, and for professionals holding a permit to use on-leash and off-leash space at off hours or during inclement weather with a larger number of dogs (say 6). While one might argue that professional dog walkers should be more restricted than that, I believe that it would be very difficult to enforce (how can you tell who is just walking their 3 dogs, and who is a professional, etc.?), and I don't see a justification based on environmental impact (if private uses don't cause a material impact, I don't believe that the commercial uses would). Possibly license fees could be charged to cover any additional costs if the Park Service found that the commercial use of the GGNRA was greater than anticipated. FINALLY, NO-DOG AREAS. WC Fields may have said that anyone who hates children and dogs can't be all bad, but that's probably a bad principle for rule making. Indeed, I often find that my own children are less well behaved (and more of a nuisance) than my dog. Fortunately, there are no proposals to limit my children's access. To be serious, I understand that some people will want to have an area of "no-dog" recreation. The question is, how much area should be devoted to the desires of what I believe is a small minority. Ultimately, I the proposals I saw seem to me to be wildly too restrictive. I have not seen any study showing what percentage of current users (or even current residents) would prefer to have a "no-dog" experience, so we have no objective basis for determining how much space should be allocated to that purpose. Thus, any restriction should be justified based on some other proxy for "fairness".

***** My suggestion, in the absence of an objective study, the Park Service should make the number of acres of "no-dog" space equal the number of acres of "off-leash" space. Equality might not always be the same as fairness, but in the absence of objective studies, it seems to be the closest we can get.

Thank you very much for taking the time to read my comments. I would be happy to speak with any Park Service representative and/or participate in a planning committee. Please feel free to contact me at your convenience.

Best regards,

John Duncan

Correspondence ID: 3096 **Project:** 11759 **Document:** 38106
Received: May,20,2011 16:20:38
Correspondence Type: Web Form
Correspondence: Dogs On and Off Leash

Written by Rachel Marissa Steinberg 5th grade 11 years old, Marin Horizon School Thursday May 19th, 2011

If you have a dog, don't you enjoy going to parks, trails, and beaches and letting your dog play, run around, and meet other dogs to explore and much more? Could you imagine not being able to do that at a lot of beaches, parks, and trails in Marin County? That might just happen. There is a big debate on where dogs should and shouldn't be allowed on and off leash at parks, trails, and beaches all over Marin County.

Puppies need to be socialized so owners bring their puppies to places like parks, trails, and beaches. Dogs need outdoor space where they can socialize with other dogs and if owners don't follow the rules only that dog and owner shouldn't be allowed at that park. Dogs should have rights to be allowed at parks, trails, and beaches.

Many people enjoy bringing their dogs to beaches, trails, and parks to play with other dogs. This is important because when a puppy plays with an older dog, they learn about appropriate behavior. This is also important because if a puppy or young dog doesn't get socialized, they might never get along with other dogs.

If someone doesn't follow the rules posted at beaches, parks, and on trails, only then should they and their dog be banned. Not all dogs should be banned because of what only some dogs might do. A good rule would be if a dog isn't under voice control, then their owner should only be able to have their dog out on a leash. Also if their dog doesn't like other dogs or if they are not friendly, they should also keep their dog on a leash. And when something bad happens that has to do with dogs, people should not blame the dog, they should blame the owner. For example if an owner doesn't pick up after their dog, that is not the dog's fault, it's the owner's fault.

Some people need a guide dog or have a service dog and they need to go places like parks, trails and beaches. And people who are blind or have a disability sometimes need a dog to help them walk. Service dogs should be allowed almost any where because they are really needed by their owners.

Dogs should have rights and be allowed on and off leash at parks, beaches, and trails. It's not only the behavior of dogs that is important. Owners also have to be good and follow rules like picking up after dogs, and any other rules that apply. Dogs and their owners rely on parks, beaches, and trails. Don't you think dogs should be able to explore, play, and run around and be allowed on and off leash?!

Correspondence ID: 3097 **Project:** 11759 **Document:** 38106

Received: May,20,2011 17:03:55

Correspondence Type: Web Form

Correspondence: I am completely opposed to restricting off leash access in the areas specified, especially Fort Funston Beach. I drive up from San Jose to let my dogs run on the beach as there are so few places dogs can get natural exercise like this. In addition it is an enjoyable place to be for us Humans that actually pay for these facilities through our taxes.

Restricting off leash access in yet another place is totally unacceptable, if this continues dogs will not be allowed anywhere!

I am sure all the millions of dog owners who vote will remember who was responsible for limiting their access to public places.

Correspondence ID: 3098 **Project:** 11759 **Document:** 38106

Received: May,20,2011 19:07:44

Correspondence Type: Web Form

Correspondence: I all my years of going to the Montara Open Space I have never seen any dog related issues, between dogs or humans. Why are you going to make the "New Lands" in Montara off limits to dogs? I have a limited budget. And I do not want to fill the air with CO2 driving my dogs to one of the very few places left in San Mateo where I can walk a dog in open space on-leash (ON LEASH!) My CO2 from my car is a much bigger Environmental Impact than my dog. Did you think of that? Some limits on OFF LEASH is fine; but the plan to limit dogs in New Lands area where dogs have been going for decades makes no sense at all to me.

Correspondence ID: 3099 **Project:** 11759 **Document:** 38106

Received: May,20,2011 19:16:27

Correspondence Type: Web Form

Correspondence: This past Wednesday afternoon my dog Franklin and I went to Crissey Field to enjoy the beautiful day.

There were many people including a group of about 40 elementary school children all wearing blue t-shirts. About 15 were having a great time running and playing with 3 dogs who had joined their fun. 2 retrievers who were getting their favorite recreation chasing and returning balls that the children were throwing. The 3rd was a shepherd who was in possession of a water bottle which he would not drop. His owner told me that a water bottle was his favorite "toy" but he would have to be tricked into giving it up.

Franklin (a terrior) was sitting on the breakwater with several children petting him and supplying him with little treats which I had given the children to feed him.

A father with two children and a dog came by and joined the group. Several more people were walking the beach with their dogs. Many more people were riding bikes or walking enjoying a beautiful day.

Franklin and I went on to walk the length of the beach and have a snack at the warming hut. It was truly a beautiful day.

Is this the experience you want to take away from the people who live in the City and our surrounding counties?

This land belongs to the City. The Park Service was hired to maintain it as a recreational area not to turn it into a game and horticultural preserve.

Correspondence ID: 3100 **Project:** 11759 **Document:** 38106
Received: May,20,2011 22:10:55
Correspondence Type: Web Form
Correspondence: Dogs need recreation sites just like their owners. This is a major metropolitan area, not exactly a wilderness setting. I think the energies of the NPS would be better spent regulating more of the country's wild places.

Correspondence ID: 3101 **Project:** 11759 **Document:** 38106
Received: May,21,2011 09:51:56
Correspondence Type: Web Form
Correspondence: I am 51 years old and have lived in San Francisco since I was 8 years old except for the years I was attending college and obtaining my Botany Ph.D. at UC Riverside. I currently teach high school biology in the San Francisco Unified School District.

I currently enjoy the areas of Lands End and Sutro Heights on a daily basis

and periodically like to visit most of the other attractions in the GGNRA. I greatly appreciate habitat restoration efforts and the care and concern for the public lands in our nations first urban National Park and am a proud new member of the Golden Gate National Parks Conservancy.

I also just rescued a 8 month old dog named Ella who was proscribed for me as a companion animal to keep my spirits up following a string of unfortunate incidents.

I feel the preferred alternative of the GGNRA DEIS is overly restrictive. I have seen dogs off leash in many parts of the GGNRA and like people they are mostly well behaved. If dogs are flushing birds, chasing animals, digging up plants, harassing pedestrians or fighting, their owners should be issued a hefty fine. If dog owners don't have their dogs under voice command or don't pick up the litter, they should be issued a hefty fine.

Scientific evidence clearly demonstrates that dogs are a benefit the the mental health of humans, especially in an urban environment. Well behaved dogs playing and running off leash on Ocean Beach or Sutro Heights derive a degree of exercise and socialization their owners cannot provide while on-leash. Off-leash play leads to happy well-adjusted dogs which translates to the mental health of owners in my opinion.

I feel that compliance-based management stifles public opinion regarding many of the issues I've discussed and is misguided. I also believe much of the EIR is tailored to fit a position for a restrictive position regarding dogs and does not accurately reflect actual scientific evidence.

A restrictive approach to dog management will severely impact San Francisco's city parks which is counter to the spirit and intent of the land transfer by the city to the National Park Service. I think it is vital to the future health of the GGNRA to take into account its urban setting and context and take a more balanced approach toward dog management that considers the welfare of both wildlife and the urban population.

Correspondence ID: 3102 **Project:** 11759 **Document:** 38106
Received: May,21,2011 09:59:01
Correspondence Type: Web Form
Correspondence: Please do not ban dogs from GGNRA and park service spaces. Please allow the new GGNRA areas in Montara to continue to be dog-friendly, as they have been for a long time. Thank you.

Correspondence ID: 3103 **Project:** 11759 **Document:** 38106

Received: May,21,2011 11:26:35

Correspondence Web Form

Type:

Correspondence: I have lived in Pacifica my whole life, 46 years, and I have spent over 30 of those years exploring every crevice of this area, so I know Pacifica's open spaces better than most. My Husband, two children, Australian Shepherd Hailey and I are avid backpackers, hikers, and mountain bikers (not Hailey), and we love the outdoors. When my husband and I were making a decision to settle down and spread out our roots, we spent a lot of thought and time researching and visiting areas that would fit our lifestyle. After much soul searching, we decided to purchase our "dream" home & commit to spending the rest of our life living in Pacifica in large part due to the fact that it was a dog-loving community that allowed us to enjoy being in nature with our beloved pet. We are now so rooted in this community that we cannot see being able to easily move, but we are faced with the horrible thought that we will never be able to roam the hills of our beautiful city again. When we chose to be pet owners, we did so with the thought of being dedicated to that pet as if it were our own child. It is unfair to take on the responsibility of owning a pet when you know that you cannot walk it daily or care for its other needs, and the GGNRA open spaces are really the only place to walk a dog that is not surrounded by traffic. In our busy lives, we have only so much time in our days to fulfill our responsibilities. I for one get my exercise and my quiet contemplative time while I walk my dog. I would never take a walk without my dog. I walk the Sweeney Ridge trail on average 6 days a week, no matter what the weather. What I can't understand is why any use of this trail would be discouraged since it is already such an underutilized area. During the week, I see fewer than 5 other hikers for the whole week; on the weekend I see about 5 other hikers per day. My dog Hailey has a tough time with other dogs, so this trail is a Godsend for me because it makes it so I can avoid the stress of passing another dog and still give her and I a needed release of energy. Here are some of the main reasons why I feel it really makes no sense to close off this area to dogs. The mission of the national parks is to "conserve the scenery and the wild life therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations." 1. A dog will not damage the current foliage on this network of trails in Pacifica more than any human being would and definitely not more than a horse would. As you are probably aware of, this trail is a small 10 foot wide clearing that is flanked on both sides by a natural wall of very dense coastal scrub which is a mixture of coyote bush, poison oak, Sun Bruno coffee bush, and spiny berry bushes. I can tell you that no dog or human could easily get through that to damage any wild plant life. What dog owner would ever want their dog to come home with poison oak oil all over its coat or have to untangle it from the brambles? 2. As for the wildlife in this area, it is thriving. Access to this trail to humans and dogs has in no way hindered life in these hills. I have seen glimpses of mountain lions on

numerous occasions, regular sightings of bobcats, fox, and almost daily sightings of coyotes. Not to mention deer, skunks, rabbit, quail, and all manner of bird. In fact, these animals flow over onto our property on a regular basis. Any "regular" that hikes this network of trails knows what is out there. The dogs that I see on this trail are on leash, as is mine, because these responsible owners fear that their pets could become prey for the predatory animals that live in this area. They do not want their pets to come in contact with these creatures. Even the non-predatory animals are a threat; for instance, nobody wants their dog to get sprayed by a skunk. 3. The network of trails from Cattle Hill though and including Sweeney Ridge make up a very minute percentage of the total open space that is left closed off to hikers and dogs and left for wildlife to live & thrive in, especially if you include the water shed areas surrounding the GGNRA land. The few miles of trail that exist should be left for the "enjoyment" of people who respect and cherish the outdoors, both dog and non-dog owning. Why pick on only the dog-owning folks, when in most cases, the type of person who owns a dog is usually the type of person who likes being outside? These are the people that will go to bat to protect the environment. It seems to me that as an organization, you should be promoting use of these trails so that people will grow to love nature and ultimately vote for laws that will protect our open space or donate time or money to support the system. In terms of marketing your cause, it seems as if you are shooting yourself in the foot by limiting yourself of the support of the dog-owning market. 4. I would hate to see this law pass and the only people to suffer are those that are law abiding. It is unfortunate that more extreme limitations on our rights are imposed to deter the few people that already break the current laws, when in reality, those individuals that are breaking the current rules will break the new ones. 5. Does it seem right that there is only one alternative dog-walking site listed for Pacifica? It is a sad state of affairs. We are left with little or no options. It seems to me that there are certain areas that need more strict control on dog access for valid reasons, but I think its unfair to create and impose "cookie cutter" laws that are meant to fix one problem onto a completely different situation and community just in the name of change. Each of these areas needs to be looked at separately and given special attention. The decisions made affect a whole community of people and I truly hope that my voice is not ignored. It would be a shame to be surrounded by God's beauty, never to be able to actually experience it.

Correspondence ID: 3104 **Project:** 11759 **Document:** 38106

Received: May,21,2011 13:20:31

Correspondence Type: Web Form

Type:

Correspondence: I am, and have been a dog owner for many years. Although we live in the East Bay Hills, and have wonderful access to the miles of trails, we love the ability to go to the beaches with our dog as well. In all the years we have

been going to the beach, I have yet to see mean or scary dogs.....no dog fights or unpleasant encounters with people. If some people are afraid (for whatever reason)of dogs in general....they should be given a small area of beach that is fenced in, where dogs can not go. The dogs shouldn't have to have to pay for their fears. The same goes true for the Snowy Plovers. Why don't you simply fence off the area of their breeding grounds to keep the dogs out.

Happy dogs equal happy people and there is nothing more free and spiritual than to see dogs romping on the beach along with their owners, children and other adults who do not have this irrational fear.

Yes, there are dogs who should not be able to enjoy this privilege and should be on a leash.....but they are the minority, certainly not the majority. In fact it is a known fact that dogs off leash are more socialized, get along better with other dogs and people, than dogs who do not have this ability. And what better place to run than the beaches: Ft Funston, Ocean, Crissy Field and others.

Please do not cave in to the dog haters and deny the dogs and their owners the rights of freedom to run

Nikki Pooshs

Correspondence ID: 3105 **Project:** 11759 **Document:** 38106
Received: May,21,2011 13:39:32
Correspondence Type: Web Form
Correspondence: I am a veterinarian practicing in San Francisco and I am completely opposed to further restrictions on off leash dog walking areas in the Golden Gate National Recreation Area.

As a taxpayer, a conservationist, and a dog lover I strongly feel this is a misuse of governmental power. If this is truly a "National" recreation area, then it should be open to all who wish to use it. Already shore line trails and much of the GGNRA space is restricted to many except those that are walking. NO bikes and no dogs is common signage on many trails.

The answer is not further restriction, but education on how to have dogs interacting in public areas including when a leash is appropriate or necessary. Dog owners should, as individuals, be held accountable for their dog's behavior. If my dog caused a horse to fall on it's owner I would expect to be held responsible. If my dog was responsible for hurting another person or dog I would expect to be held accountable. I SHOULD be held accountable! I have personally been affected by out of control dogs at Fort

Funston such as when my child was knocked over by an exuberant and out of control dog and the unapologetic owner/walker informed me I was at a "dog park" and not a playground. Does this mean that all dogs should be restricted from Fort Funston? Absolutely not!! Should this dog walker/owner have been held responsible for any injury caused by an animal under their care. Absolutely YES!

The current dog walking areas MUST not be restricted!!! It will place an unfair burden on city parks by concentrating the large number of dogs in San Francisco and surrounding areas into relatively small city parks. It will increase negative interactions such as what I experienced at Fort Funston a couple of years ago.

Furthermore, the meeting times available to comment on such issues severely restricts many people, such as those with jobs, from commenting and having a say in this important debate.

Correspondence ID: 3106 **Project:** 11759 **Document:** 38106
Received: May,21,2011 13:59:43
Correspondence Type: Web Form
Correspondence: We need to adopt a reasonable plan that permits dog time off leash and on leash. Our beaches should permit dogs to be off leash between the hours of 5am to 10:30 and 5pm to 8pm.

We need to share resources and not have one group dictate the entire use of our open space.

Thank you.

Correspondence ID: 3107 **Project:** 11759 **Document:** 38106
Received: May,21,2011 16:08:33
Correspondence Type: Web Form
Correspondence: It is my fervent and sincere hope that the GGNRA will see fit to MAXIMIZE opportunities for dog walking on property under its aegis. Family dogs are just that - part of the family - and should be accommodated as such. Even with dog walkers, these are family members. Fort Funston remains one of the happiest places in all of San Francisco because of the joyful canines and their people out there. My family visits San Francisco quite often, and in fact, we used to live in the City. We travel with our dog - everywhere. If San Francisco and the GGNRA become unfriendlier than they already are to dogs, we will just have to cut those visits down. This sounds like a small-impact action, but if enough dog owners follow this

path, it will make a difference. There are hundreds of thousands of family dogs in this country. By taking a stand against them, you take a stand against a huge segment of the economy that comprises veterinarians, manufacturers of dog medicines and related products, dog food companies, makers of doggy accessories (beds, crates, leashes, etc.), makers of doggy poop bags and dispersers, hotels that accommodate dogs (many of them 4-stars and better), dog walkers, dog sitters, doggy day-care camps, dog portraitists, makers of clothing for people who love dogs, and on and on. I hope the GGNRA will find a way to work with dog owners, not against them - and all their connections. Thank you for considering my comments.

Correspondence ID: 3108 **Project:** 11759 **Document:** 38106

Received: May,21,2011 18:52:33

Correspondence Type: Web Form

Correspondence: We are regular visitors to Crissy Field. In fact, one of our favorite spots in all of San Francisco is East Beach, and one of the best things about East Beach is the dogs and their owners. It's great fun to watch the dogs playing together up and down the beach and in and out of the water, chasing balls, digging in the sand, running fast the whole length of the beach just for the sheer joy of it. We are not dog owners ourselves, and have never even been particularly interested in dogs, but sharing the beach with all these happy, well-behaved dogs running free with their happy owners is such a great pleasure that we always take our out-of-town visitors to East Beach to enjoy it together. The playful, off-leash dogs add an important note of levity to the humans' too-serious lives.

In more than 10 years, relaxing at East Beach two or three times a week year-round, we have never seen a dog threaten another dog or bother any person, old or young. The same is true along the Promenade all the way from the Yacht Club past the Warming Hut, even on days when the Promenade is crowded with walkers and cyclists. The dogs that are off leash are in fact well under the voice control of their owners, posing no danger or discomfort to anyone. We notice, too, that dog owners respect the wildlife protection sections and the tidal areas, keeping their dogs away from those sensitive areas.

The EIR mentions the potential management cost of continuing the voice-control regimen at Crissy Field. The dog owners may have already suggested this, but it seems to us that they could organize a volunteer beach-monitor system that would achieve GGNRA's objectives without the draconian restrictions that are proposed in the plan.

Correspondence ID: 3109 **Project:** 11759 **Document:** 38106

Received: May,21,2011 19:27:24

Correspondence Web Form

Type:

Correspondence: We have a large dog. We own a house in Noe Valley in the city. Our yard is not big enough for our dog to run more than a few feet. She needs more exercise than just walks on a leash in the neighborhood. The city parks in our area are too small for her. She gets overwhelmed by the other dogs and has lost 3 teeth due to scuffles in the park with other dogs.

We love taking her to Fort Funston because she can safely run on the beach without encountering another dog on accident. We can watch her and call her back if we see anyone else coming. She can run into the ocean and roll on rotting crab. Her twice weekly romps at the beach keeps her healthy and her weight down. We take her during the week and only run into other dog walkers and never tourists or families. She is 8 years old but the vet says her regular exercise keeps her limber and healthy.

1% of the entire GGNRA should be kept for off leash dogs. Our dog walker told us how Fort Funston was full of needles and homeless camps before the dog walking groups started arriving. We owe them thanks for helping clean up Fort Funston for dogs and families.

Correspondence ID: 3110 **Project:** 11759 **Document:** 38106

ID:

Received: May,21,2011 20:43:33

Correspondence Web Form

Type:

Correspondence: General views: It would be an abuse to enforce restrictive alternatives at all sites. Even the preferred alternatives mostly restrict ROLA areas and often on-leash areas. I assume the NPS seeks a balance serving the wide variety of public users. I urge that this balance NOT be imposed at every site; rather, a balance of uses can be obtained by offering different alternatives mix of uses at various sites. For example, very restrictive ROLA and on-lease areas at all sites just because some in the public are uncomfortable with dogs nearby, would be inappropriate. Instead, there should be some areas where liberal ROLA areas prevail, and some people will choose to go elsewhere. But there really should be some areas with large ROLA designations. This does not seem to be the case for the preferred alternatives throughout this plan. Again, the balance should be regional, not at every site.

The plan for dealing with non-compliance is a trap! 12 months with average 75% compliance is severe, but more importantly the plan that an area not in compliance would shift to the more restrictive alternative with no chance to ever get dog privileges back again later is unacceptable. (Do I have this right! Seems very bad.) I urge some plan where more restrictive enforcement is for a probational period, followed by return to the baseline

alternative. It seems clear that the enforcement plan proposed can only move one way, and thus will gradually shift all areas to more restriction or exclusion of dogs, inevitably. That is totally nuts!?

Comments on 2 sites: I have personal interest in Mori Point and Ft Funston. I do feel my comments apply more generally, however.

Mori Point -- ? I favor Alt. A (all trails on-leash) ? Alt. C (Preferred) is acceptable, as is Alt. E ? Bootlegger Steps and the Headlands trail should be on-leash too

Plan D is certainly too restrictive. It appears that Alts. A, C and E are similar, and I favor wide access on-leash throughout the site. Not sure why some ROLA is not acceptable, though the endangered species may be the reason? If so, so be it (although neither of the main species are bothered much by dogs nearby, are they? So might there not be some poor snake habitat that could be ROLA?) In Alt. C and E, are Bootlegger Steps and the Headlands Trail on-leash? They should be.

Ft. Funston - ? I prefer Alt. A (no action) ? Much of Alt. C (preferred) is acceptable, except I suggest a much larger ROLA

I favor a much larger ROLA area here than is suggested in the preferred Alt. C. My regional balance vs within-site balance really applies here. We really need, and it is appropriate to allow, some areas where there is a large area for ROLA. Funston has this tradition, and Alt. A is essentially this. I DO FAVOR Alt. A for Funston, but if more restriction is deemed necessary, I urge a larger ROLA area. Designating a few restricted trails is acceptable.

Thanks, and good luck with this!

Correspondence ID: 3111 **Project:** 11759 **Document:** 38106
Received: May,21,2011 21:21:54
Correspondence Type: Web Form
Correspondence: One of the things I enjoy most about living in Pacifica is the accessibility of outdoor recreation. We live within easy walking distance of Mori Point and a short drive to other GGNRA locations (Sweeney Ridge and Fort Funston). I object to the proposed changes to the current dog policy for a number of reasons outlined below: ? I regularly use the trails of Mori Point and find the status quo quite satisfactory. Dog owners are generally VERY responsible and problems are rare. There seems to be a synergy in the area between human use (including people with dogs) and efforts to plan native native plant species and remove invasives. I see no need for any change, especially to a policy that will not allow even leashed-dogs on many of the trails. ?

GGNRA is located in a large urban environment. Although administered by the National Park Service, it is distinct from national parks such as Yosemite. The goal of land-use of this land should not be primarily preservation, but to help maximize recreational options for the population of the area. Multi-use, including both on- and off-leash areas for dogs should be encouraged. Compliance-based management, where restrictions only increase, should not be a part of any plan. ? The clause about new lands is much too restrictive. We in San Mateo County already have nearly no opportunities to have our dog under voice-control, and GGNRA land that allows on-leash options are severely limited.

Sincerely, Patricia Kremer

Correspondence ID: 3112 **Project:** 11759 **Document:** 38106

Received: May,21,2011 21:34:31

Correspondence Type: Web Form

Correspondence: I take my dog off leash to Ocean Beach almost every weekend all year round. On most days--excluding the handful of warm days we get a year, which I avoid--I encounter very few other people. A large percentage of the people at the beach with me are there with dogs, most of which are well behaved and stick to the tideline. I have reviewed the proposed restrictions for Ocean Beach, and find them draconian. It is an enormous beach that is largely unused most days of the year, and it seems to me to be an overreach to shut practically the entire beach down to off leash dogs. I am in favor of protecting the plover, but as I understand it, the real issue is protecting their nests in the dunes. If that is indeed the case, why don't you just cordon off the dunes, or restrict access to that part of the beach? I think most people who want to have their dogs off leash mostly want to do so along the tideline so that their dogs can swim. I only go at low tide, and I only let my dog off leash when we are on the wet sand.

Correspondence ID: 3113 **Project:** 11759 **Document:** 38106

Received: May,21,2011 22:01:14

Correspondence Type: Web Form

Correspondence: I'm a San Francisco native, born and bred, and I have always had at least one dog. To try and limit access for off-leash dog walking is a horrible idea. Dog walkers make a point of looking out for one another and their dogs and keeping our parks in good shape! Dogs not only add to the richness of living in the bay area, it has been proven that they also add to the quality of life for those that have them and those that come into contact with them. I really hope that the decision makers at the GGNRA will really think about the benefits of having happy dogs and happy dog people and happy people who

come into contact with happy dogs that occur on a daily basis in all of the off-leash areas in and around San Francisco. Keep the off-leash areas legally off-leash! Thank you.

Correspondence ID: 3114 **Project:** 11759 **Document:** 38106

Received: May,21,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The GGNRA have singled-out the canine species and off-leash dog walking as a problem for recreational park land, and propose to limit and in some areas remove, dogs from currently designated areas. The GGNRA's specific opposition to dogs and their exercising off-leash naturally invites specific consideration to how and why canine and humans exist together in society, in a broader capacity.

The dog is an intelligent and emotional species we turn to for assisting us humans in many tasks, and it contributes as part of a society's volunteer work force. Besides being a widely cherished family pet, the canine species is: ? A comfort to the terminally ill ? Trained to provide services to the impaired and disabled ? Employed in search and rescue scenarios in natural disasters and the tracking of missing people ? Hired by the army and police force for routine and special operations such as mine detection ? Used for guarding, herding, hunting and supporting local economies around the world ? Used as a surrogate to orphan mammals ? A species that in the past was considered a useful source of physical power, for household duties such as churning butter and turning roasting pits.

Sadly, dogs also: ? Endure "passive" cruelty typified by cases of neglect, and "active" cruelty of malicious intent, as when a person has deliberately and intentionally caused harm to them. ? Make up four million animals-about one every eight seconds-that are put down in U.S. shelters each year ? Are widely used in biomedical research, testing, and education, and live in caged unnatural environments indefinitely until they are given euthanasia, sometimes once the experiment is completed. ? Are forced into underground blood sports where they are made to fight, sometimes to the death for entertainment and revenue from stud fees, admission fees, and gambling. ? Are used as "Bait" animals to test a dog's fighting instinct; often mauled or killed in the process. ? Are banned in some US states and countries around the world without diagnosis for their breed's reputation, alone. ? Are forced to take part in dog racing solely for entertainment and profit and at the expense of the animal's welfare. ? Are irresponsibly over-bred in puppy mills, where the forced and crowded daily conditions result in health issues and psychological disorders. ? Are exposed to "Class B dealers" in many US states who are legally allowed to buy them from random sources such as shelters and pounds to the sell them on for medical research. 7 out of 11 of

the country's Class B dealers are under investigation, and another has their license suspended, yet this process is still legal.

In conclusion, we have changed and manipulated this species to exist alongside man. We have used its capabilities to our advantage, and too many have taken advantage of its nature negatively too. It is a small freedom of theirs to run free in a natural habitat. With consideration to all of the above, we as the dominant species of this planet have a moral and ethical responsibility to treat this species with respect and appreciation.

We need to accommodate their freedom to exercise and play in our recreational park plans. We can and should all co-exist.

Correspondence ID: 3115 **Project:** 11759 **Document:** 38106

Received: May,21,2011 22:09:59

Correspondence Type: Web Form

Correspondence: The GGNRA needs to compromise. Before I owned a dog I would never have given any thought to this whole debate, but now I understand. I have an 11 year old mixed bred shepherd/retriever named Julia. She is a great dog. She is well exercised and happy. If I did not have places like Fort Funston, Ocean Beach and Crissy Field to go to, she would never get the type of exercise she needs to be calm, well mannered and healthy. The GGNRA's argument about public safety at Fort Funston specifically, is a poor one. Who else goes there? As a single woman, I do not feel comfortable hiking there by myself. Would families go there for a picnic? ...No, it is too windy. Fort Funston would become a magnet for partiers and vandals without all the dogs. The parking is great, it is remote and it bothers no one. If the argument is trash, there is very little. I think that most of the dog owners, and walkers, really respect this wonderful place. Sometimes I go twice a day and I have never seen a Ranger patrol the area. I also go to Stern Grove which would become overwhelmed with the volume of dogs and cars if Fort Funston is not available. That would put more strain on our SF Recreation & Parks Department for up keep. Maybe there could be check-in booth and admission could be charged to park? Monthly and yearly discounts (for anyone who uses the parking lot, including the wind surfers) could be offered? This would be a great way to make sure the dogs have collars and current registration as well. I think that for Ocean Beach and Crissy Field a great compromise could be the time of day. I know there are a lot of children and/or people who are afraid of dogs. They deserve to enjoy the parks too. But if you have a dog at the beach at 7am who cares? The dogs actually help keep the area safe. I have been there at 6:30 in the morning when it is so beautiful and quite, along side other caring dog owners and the joggers, only to find a few partiers or homeless on the beach. Maybe having the beaches off leash before 11am would be a solution?

We need your help, your voice. If I did not own my underwater house, I would considering moving out of SF if this ban is passed. I have lived here for over 25 years. I have been proud to live here, but this silly ban of Fort Funston is just wrong. We owe it to the dogs to have a safe place where they can be socialized and exercised.

Correspondence ID: 3116 **Project:** 11759 **Document:** 38106

Received: May,21,2011 23:02:21

Correspondence Type: Web Form

Correspondence: Myself with my family visit multiple National Parks throughout the US yearly. Living in San Francisco, we visit Golden Gate National (and more specifically the Presidio) on a regular weekly basis. I feel that the Federal Government has done an outstanding job creating rules and regulations for the management of all the lands under the jurisdiction of the Department of the Interior. I do not agree with Golden Gate National creating new rules specifically for only this park. Park Management should only include in the dog management plan those rules that all National Parks are required to follow. There should be no area in which dogs are allowed off leash for both the safety of staff and other visitors, but also for the safety of all plant and wildlife. The National Park Service Organic Act states that "...to promote and regulate the use of the...national parks...which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." How can a National Park uphold this mission statement and allow this generation of citizens bring multiple dogs and have them off leash in such sensitive areas? I would like my daughters grandchildren be able to enjoy "the scenery and the natural and historic objects and the wild life therein." Please keep these land in impaired.

Correspondence ID: 3117 **Project:** 11759 **Document:** 38106

Received: May,22,2011 00:03:33

Correspondence Type: Web Form

Correspondence: Dear GGNRA management:

Please do not change and limit the GGNRA/park areas from allowing dogs to play, run, socialize, and discover nature off-leash with their human family members!

There are already many areas preserved and protected for natural habitat. There are also many areas that allow people and kids to play, run, and enjoy

nature. But for animal lovers, like dog owners, we have so very few areas that we could go to nearby where we live in the Bay Area, to allow our dogs walk, play, and socialize with other dogs and people. Many of us, dog owners, view our dogs as our family members and even our "kids." Most of us who takes our dogs to off-leash areas are very responsibly pet owners. We know that the best way to allow our dogs be happy and then behave at home is to allow them exercise in their natural way -- be off-leash to run, play and explore. Because the Bay Area is so crowded and expensive, most of us live with our dogs in rather small restricted areas. If we could not bring them to nearby places on a regular basis to get off-leash exercise, then that is when dog owners just give up their dogs to animal shelters. Majority of these so called "problem dogs" are just dogs who have behavior problems because they do not get exercise. Ask any dog owner and they can tell you that after even 15 minutes of off-leash play (in dog parks or nature), their dogs are ready to go sleep at home. They are just like kids who played in the park, then they calm down, behave, tired and happy. One park trip could take care of most behavior problems (with additional training where appropriate). The statistics show that almost 50% of households have a pet. Dogs are very popular in the Bay Area. They need a place to be off-leash.

We want our dogs to be domestic animals and live side-by-side with us people and our neighbors. But if we want to continue to form the human-dog bond, we need to let them to "dogs." Dogs need to walk, run, play, explore and social off-leash where it is safe for them (and w/o cars)!

I go to Point Isabel in Richmond with my 2 Golden Retrievers all the time because I am currently living in the East Bay. They are high energy dogs and they need to go off-leash. I have never seen any problems with the people and dog sharing Point Isabel. The dogs just run and play and they don't bother people who do not want to be bother. There are many people who go to Point Isabel without dogs and they are never bothered by the off-leash dogs. This is also true for children, even toddlers. So why can't we leave things the way it has been for years. Don't punish majority of the responsible dogs owners with a few bad dog owners and dogs.

I do not agree with the proposals to restrict dogs off-leash areas. Thank you.

Elise Chu

Correspondence ID: 3118 **Project:** 11759 **Document:** 38106
Received: May,22,2011 02:13:15
Correspondence Type: Web Form
Correspondence: I am against any changes. I am born and raised in San Francisco. I have always had a dog. Our dog is a part of our family, she brings a lot of love

into our family. I walk our dog every morning at Fort Funston. I clean up after my dog, keep my dog out of restricted areas, and stay on trails. I get so much happiness out of my morning walk with my off-leash dog. My dog is big and needs to run for her well-being. Many dogs live in San Francisco. They are living creatures with needs and hopefully some rights. Fort Funston is an urban park in San Francisco, which the dogs should have access to off-leash. There is so much socialization of different types of people, and this may be there only community.

Correspondence ID: 3119 **Project:** 11759 **Document:** 38106

Received: May,22,2011 03:58:04

Correspondence Type: Web Form

Correspondence:

I am from the Tri-Valley area, and San Francisco Ocean Beach, Fort Funston is the closest place for me and my dog to go. The next closes place is Stinson Beach in Mill Valley.

Please do not make this a dog on leash area. This is the only place my dog can embrace her dogness. We both enjoy or time here. It is always clean and all dog owners and their dogs are consionsous, unlike all other areas I have been in... Please Save and Researve Fort Funston/ Ocean Beach!

Correspondence ID: 3120 **Project:** 11759 **Document:** 38106

Received: May,22,2011 05:46:20

Correspondence Type: Web Form

Correspondence:

I am extraordinarily disappointed with NPS proposed preferred alternative for the Golden Gate Parks National Recreation Area's dog policy.

Third, the DEIS is unusually flawed, suggesting not only a hasty and poor analysis, but also opening up the DEIS to significant legal challenges:

1) The DEIS treats recreation in GGNRA as an adverse impact, despite the fact that GGNRA is a mandated recreation area, and not exclusively for conservation. DEIS must include an evaluation of the benefits of recreation. When I relocate to SF, I plan to enjoy these areas with my family, and my dog Charlie. I have no illusions about taking Charlie to a place like environmentally-sensitive habitat in Yosemite. But I would like him to be able to run all three beaches on Crissy Field.

2) The DEIS fails to take into account the urban context surrounding GGNRA. A dense, urban area (the 11th largest MSA in the country) surrounds GGNRA, yet the DEIS ignores the potential negative impacts of these new restrictions on area residents and the region as a whole.

Inexplicably, the DEIS fails to take into account the implication of these new rules on the regional population - even though estimates by the American Pet Products Manufacturers Association (2009-2010 National Pet Owners Survey) estimate that one in three households in the U.S. own a dog. Literally thousands of visitors to the GGNRA come to use the off-leash dog areas, and nowhere in this proposed alternative is their voice represented.

3) The NPS' DEIS frequently misrepresents proven science in pursuit of its over-broad regulatory agenda. For example, the DEIS frequently cites potential problems with off-leash dogs that "could" or "might" happen - even though there are no document examples of these issues in the 30+ years of the existing off-leash rules. Claims of impacts on bank swallows are unsubstantiated, and in fact run counter to 1996 GGNRA findings by Nola Chow that dogs do not impact the swallows (for reasons unclear, this particular report was excluded from the DEIS). Claims of impacts on snowy plovers and swallows is not sustainable when the data is closely examined. More alarming - the NEIS fails to provide site-specific resource impact statements. The absence of these document impacts suggests the NEIS may not withstand legal scrutiny, and further goes against GGNRA's own operational requirements - without documented proof of observed negative impacts, the NEIS is invalid.

4) The DEIS asserting that off-leash dogs represent a safety issue is woefully unsubstantiated. According to the official incident reports on file with GGNRA, less than 2% of reported safety and security issues in GGNRA are dog related, averaging 2 incidents per 1.3 million visits. While I concur that an off-leash dog that is a safety threat to GGNRA visitors should not be welcome within the Area, surely there is a middle ground between existing policy and a sweeping revocation of access. Potential alternatives include banning the individual and their dog from the Area, requiring permits to show a dog is authorized to be off-leash (with permit requirements including up-to-date vaccinations, for example). But with 98% of security and safety issues coming as a result of human behavior, off-leash dogs are not the issue NPS needs to focus its resources on to make visiting GGNRA a safer and more pleasurable experience.

5) The DEIS unfairly discriminates against responsible owners of well-behaved and socialized dogs by designating limitations on GGNRA use for ALL dogs based on the argument that something "might" or "could" happen. In the absence of clear documentation of a problem, discriminating against such a broad group is hardly democratic. Surely, there should be limitations on specific owners of specific dogs that threaten health, safety and/or well-being of GGNRA users and wildlife. But for those who are respectful of the existing reasonable limitations, holding them accountable for potential

behavior issues not related to their pets hardly withstands scrutiny.

7) Finally, banning off-leash (and in some cases on-leash) dogs from parts of GGNRA is an extreme step, ignoring potential incremental steps such as additional signage, warnings about habitat, natural barriers (such as vegetation near cliffs). GGNRA could, for example, require special permitting for off-leash animals on order to better track their conduct. Signs warning owners to respect specific areas during specific seasons would undoubtedly be well respected (especially given NPS' demonstrated willingness to unilaterally remove areas from access).

I am grossly disappointed in the proposed alternative for GGNRA, and strongly recommend NPS revisit this process. With documented input from the public, a reasonable compromise can be reached which promotes respectful use of the GGNRA by dogs, dog owners and other visitors, without grossly over-restriction of the rights of dog owners and broad revocation of access to off-leash areas.

Correspondence ID: 3121 **Project:** 11759 **Document:** 38106
Received: May,22,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Correspondence ID: 3122 **Project:** 11759 **Document:** 38106
Received: May,22,2011 07:47:08
Correspondence Type: Web Form
Correspondence: Please have designated dog parks or walking trails. There are too many dogs, especially people getting more and more pit bulls. If they want to take their dogs where they can run free, take them outside a heavily populated urban area. That isn't too far for them to drive. Putting dogs on leashes forces the owners to be more responsible. They should enforce poop cleanup, too. Other areas have dog parks & trails, GGNRA should, too. Dog owners will complain, but you can't have kids running around with a pit bull off leash.

Correspondence ID: 3123 **Project:** 11759 **Document:** 38106
Received: May,22,2011 08:52:56
Correspondence Type: Web Form
Correspondence: During the many times I have visited the San Francisco beaches , I have

found the dogs to be very disturbing both as an environmental hazard and also invasive in my space. Picnics with children are not fun with dogs trying to share the same space. They should be restrictions on the number of dogs allowed for each person. Leash laws are not obeyed as far as I have noticed, the dogs seem to own the City.

Correspondence ID: 3124 **Project:** 11759 **Document:** 38106
Received: May,22,2011 09:19:34
Correspondence Type: Web Form
Correspondence: I am in favor of the Dog management plan. In the last few days, I have seen dogs being washed in the shower, dogs brought into the bathroom, dogs off leash in the pick nick area and parking lot, dog poop on the lawn and beach, a pit bull style dog fighting with some big fluffy dog both off leash that the owners were trying to pull apart at crissy east beach. Dogs growling at people on the beach.

Correspondence ID: 3125 **Project:** 11759 **Document:** 38106
Received: May,22,2011 09:48:09
Correspondence Type: Web Form
Correspondence: As a dog owner and parent-to-be, I feel that the Preferred Alternative is NOT acceptable. It is unfairly restrictive and the available data does not warrant this type of action. I have seen people who do not walk their dogs responsibly (leaving behind dog feces, allowing their dogs to run straight through a picnic, and even chasing birds); however, enforcement should be targeted at this minority of dog owners. I am about to have a child and hope that he will have the opportunity to interact with people and dogs in our beautiful national parks in a free and respectful way. Thank you for your time.

Correspondence ID: 3126 **Project:** 11759 **Document:** 38106
Received: May,22,2011 10:49:36
Correspondence Type: Web Form
Correspondence: Taken together, the "Preferred Alternatives" in the Draft Dog Management Plan are far too restrictive in reducing (a) the number of places dogs are allowed, whether on or off leash, and (b) the number of areas where dogs may be off leash. The 1979 Pet Policy needs to be reinstated and, at the same time, the NPS must embark on a new strategy of collaborating with dog owner groups to the long-term benefit of everyone who loves our national parks.

I am a committed environmentalist: I donate to many conservation organizations and volunteer with habitat restoration activities. I am also a member of the public who loves dogs. My primary recreation is to hike with my dogs, both on and off leash, and I understand my obligation to ensure they and I do no damage, leave no litter, and respect designated nesting areas and other sensitive sites. My recreation is as valid as anyone's and needs to be broadly accommodated in the plan. For the National Park Service (NPS) to simply deny access to members of the public to swaths of public land is bad public policy.

Many dog owners in the San Francisco/Marin areas, like myself, are ardent supporters of open space and habitat preservation and restoration. The proposed preferred alternatives will serve only to alienate a vocal, empowered, and committed group that would be better steered toward supporting the NPS and shared goals of environmental protection and open space acquisition.

Cultural change takes place over time. Look at how far we've come in the past fifteen years in having people pick up dog feces. This act was unthinkable only twenty years ago and now most, of course not all, dog owners comply. It would be far more effective for the NPS to spend its time and effort on education and collaboration with dog owner groups to support NPS goals and develop a code of appropriate behavior for dogs in open space. Dog owners are very committed "watchdogs" over their peers' behavior and want to preserve their rights.

Certainly, some restrictions are necessary. Nesting sites, for example, should be off limits. Where appropriate, fencing, signs, and enforcement are essential. However, if the NPS really wants to protect very sensitive wildlife sites at certain times, it needs to restrict access to everyone. People degrade the environment, not dogs. Many times I have observed people clamber down banks to off-limits areas for a cell phone photo, or crawl under fences to play in newly restored areas-?while dog owners who are abiding by the rules grit their teeth, knowing we will get the blame.

I urge you to think in new ways. The Dog Management Plan should reflect awareness that people with dogs want to be with their dogs in the parks. The acquisition of open space should not automatically mean those areas are rendered off limits to us. The NPS should tap the commitment of dog owner groups to educate people about the environment and to be watch dogs for sensitive areas.

In sum, the preferred alternatives are unacceptable. The 1979 Pet Policy needs to be reinstated. Together the NPS and dog owner groups can develop innovative approaches to managing park land that instead of relying on

restriction and enforcement, focus on collaboration and education, recognizing that dog owners have the right to enjoy our national parks. Thank you. Yvonne Tevis

Correspondence ID: 3127 **Project:** 11759 **Document:** 38106
Received: May,22,2011 13:25:33
Correspondence Type: Web Form
Correspondence: The proposed dog management plan is rash and unacceptable. Any wildlife that needs protecting in these areas are already in a national park with boundaries set up for their safety. The people frequenting these areas are responsible dog owners who know how to control their pets and exercise the utmost caution in unleashing them on the environment. Birds or other endangered animals nesting atop the cliffs of Ft. Funston would hardly benefit from dogs being leashed on the beaches 100 feet below. Furthermore, any animal that may be upset by a passing dog will be no match for other naturally occurring birds, gulls, raccoons and the plethora of other animals which already freely live in these areas. Our dogs do no more damage than their natural counterparts. Please reconsider taking no action against the current rules and regulations regarding unleashed dogs in the GGNRA. Our beloved companions deserve to be able to experience and enjoy nature the same as us.

Correspondence ID: 3128 **Project:** 11759 **Document:** 38106
Received: May,22,2011 13:57:30
Correspondence Type: Web Form
Correspondence: I strongly support the proposal to restrict off-leash dog activity in the park. Free-roaming, off-leash dogs are fundamentally incompatible with the purposes of a national park because they harass and endanger the wildlife that is supposed to be protected. They also mean that no other park user can peacefully enjoy their own multi-use experience of the park because the guaranteed out-of-control behavior of just a few dogs destroys that possibility.

Correspondence ID: 3129 **Project:** 11759 **Document:** 38106
Received: May,22,2011 14:16:17
Correspondence Type: Web Form
Correspondence: No scientific studies were done by GGNRA, on Rancho Corral de Tierra (Rancho) lands to justify the validity of the EIS, as it applies to the "New Lands". Where is the soils and geology report? Where is the water quality report? Where is the vegetation report? Where is the wildlife report? Where

is the special status species report? Where is the report on our cultural resources? Where is the report on visitor and use experience? Where is the park operations report? Where is the report on human health and safety? Where is the report on sustainability and long term management? In my opinion, this is an illegal EIS for the "New Lands".

Public hearings were promised but not held. GGNRA's preferred alternative for the Rancho is unfair and not truly multi-use. Marin and San Francisco have off-leash and on-leash areas for dogs, San Mateo is being given none.

I have walked my dog alone in the area north of Montara, east of Highway 1, and south of McNee Ranch State Park for 32 years, off-leash and on-leash. During this time there has never been an attempted, or a successful, molestation of a woman walking in this area. It is hilly with lots of trees and dense brush. Women often walk alone here because having a dog with you makes it safe.

Montara does not have a community park or community center for socialization. The area we use to walk our dogs serves both these purposes. If you ban dogs from this area, we will be forced to walk hundreds of dogs in the narrow streets with no sidewalks, and on Highway 1, to get to the State Park, where dogs are allowed on-leash.

As over 300 residents who walk our dogs in this area, we have put in six poop cans, and keep them stocked with plastic bags. We are self-policing and there is virtually no dog waste on the trails. There is lots of horse poop, and some coyote poop.

If there are any endangered plants or species in this area, they have survived half a century with hundreds of dogs using the area off leash. They are hearty enough to continue to survive with dogs continuing to use the area.

I am requesting that the GGNRA's preferred alternative for New Lands, including Rancho, be changed from alternative D (No dogs allowed) to a "No Change" alternative. Current usage of the land, including dog walking, should continue to be allowed until scientific studies are done indicating that dog walking is harmful to park resources.

A total ban on dogs is unacceptable. Creative multi-use solutions have not been considered. In Washington state, and Santa Cruz, CA, there are off-leash days, or off-leash hours in park areas. We are asking to continue to use approximately 100 acres with our dogs, out of 4200 acres.

At a time when obesity is a national concern, GGNRA is forgetting that the main reason people walk who have a dog, is for the dog's well being. You are encouraging people to stay at home with their dogs, and not walk.

Shame on you.

Correspondence ID: 3130 **Project:** 11759 **Document:** 38106

Received: May,22,2011 14:23:54

Correspondence Type: Web Form

Correspondence: Dear GGNRA Supervisors:

I would like to comment on the Draft Plan/Draft Environmental Impact Statement for Dog Management in the GGNRA and go on record in support of the "No Change" Alternative "A" and the continuance of the 1979 Pet Policy on access for people with dogs. For the past ten years I have been walking dogs at Muir Beach, Crissy Field, Rodeo Beach, Ocean Beach, and Oakwood Valley, on and off-leash in compliance with prevailing regulations.

I believe I am a responsible dog walker- I carry a waste pick-up bag and a leash for my dog; I clean up after my dog; I don't allow my dog to harass other persons, animals or wildlife; I respect and protect natural resources; I don't allow the dog into restricted areas; and I follow the posted signage. In my experience and observation, the overwhelming majority of dog owners also follow these rules based on common and mutual courtesy. (I do see humans tramping in areas marked as sensitive habitats, and I see an astonishing amount of trash washing up at these beaches, and on the trails, but I don't believe these can be blamed on the dogs' use of these recreation areas.)

Moreover, after reading your proposed changes to the existing regulations and looking into the various issues involved, I would like to observe further that, in my opinion, Severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. Target enforcement should be focused upon the small number of people whose dogs misbehave, not on excluding the entire class of people with dogs from most of the GGNRA.

The DEIS continues a trend of GGNRA claims about impacts by dogs on birds that are not supported by the data. There is no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife (snowy plover, bank swallow, etc.). Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity,

abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impacts. This indicates that assumptions about impacts from off-leash dogs must be tested and proven to be true before they can be used to justify restrictions. Many of the assumptions cited by the GGNRA have not been adequately tested or proven. Dog owners are being held to a standard of behavior that is impossibly high, and significantly higher than any other park users. For example, studies by GGNRA staff routinely show people without dogs "disturb" plovers, but there is no attempt to restrict people without dogs from the beaches where plovers roost (not nest). Focus enforcement on people who do not keep their dog from chasing birds rather than on excluding all people with dogs.

The DEIS is full of impacts of dogs on wildlife and other park visitors that "could" occur, but there is little evidence that these impacts actually do occur. After over ten years of intensive scrutiny of off-leash dogs in the GGNRA, it should be obvious if those impacts really do occur. The lack of data indicates they do not. For example, the DEIS mentions that disease "could" be transmitted to people from unpicked-up dog feces. However there has not been a single case of dog-feces-caused human illness reported by the San Francisco Department of Health for over 50 years. A management policy should not be based on hypothetical impacts.

The level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use of GGNRA resources. The DEIS states that it will cost nearly \$1 million to enforce the Preferred Alternative, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs.

The inclusion of a "poison pill" in the DEIS suggests the GGNRA will use it as an end run to ban off-leash dogs in the near future, bypassing the kind of public process such an action is normally required by law to follow. The DEIS includes a "compliance-based management strategy" that calls for further tightening of the restrictions in a given area if it is determined that less than 75 percent of dog walkers are complying with the new rules over a one-year period and that the GGNRA will change the management of the various areas to the next more restrictive level-an off-leash area will become on-leash only, an on-leash area will become no dogs at all. This section must be removed from any final Dog Management Plan because,

a) This compliance-based management strategy is unfair, because it can only be changed in one direction-toward more restrictive levels of access for people with dogs.

b) There is no provision for public comment in the case of a change in status of an off-leash or on-leash area because of the compliance-based management strategy.

c) How will compliance be monitored? Who will do the monitoring? The GGNRA has repeatedly relied on poorly trained volunteers with a deep-seated bias against dogs to monitor the interactions between dogs and snowy plovers. Why would we expect these compliance monitors to be any less biased? Will their claims of non-compliance be valid? Will the GGNRA resort to the use of surveillance cameras to monitor compliance?

d) This allows a few bad actors to result in the removal of off-leash access everywhere in the GGNRA, even if there are tens of thousands of hours of incident-free dog walking for every single incident. Including a "nuclear option" in a management plan is not good management policy. Regulations already exist to target those who do not control their dogs when they are off-leash. Please target enforcement at those bad actors, not at the huge numbers of dog walkers who do not cause problems.

In short, the "Poison Pill" of a "Compliance-Based Management Strategy" is unfair since it can only reduce off-leash access and not increase access in the future, and is an attempt to circumvent the legal requirement of a public process when management changes that are significant or highly controversial are made. It will not work and must be removed.

In the legislation that created the GGNRA, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA. When dogs are walked in a responsible way (as most are), there is no conflict with the environment or with other park users. Target people not walking their dogs responsibly, but leave the vast majority of us alone.

The 1979 Pet Policy allowed dogs off-leash on less than 1% of GGNRA land. In other words, 99% of all GGNRA land is off-limits to dogs now. There is much-most-GGNRA land where humans will see either no dogs or dogs only on-leash. On the Oakwood Valley trails, for example, I frequently count the ratio of people with and without dogs and it is usually about 12-15 people using the trails with a dog and even at popular times of the day (Saturday morning, for instance), 1 or 2 people walking without dogs.

All evidence points to the status quo as being the best of the options

presented in the new proposal. It's the policy in effect since 1979, and over 99% of people and dogs seem to co-exist under current policy with no trouble. I would support some reasonable changes-perhaps new restrictions, such as licenses for dog walking in the GGNRA, and/or fees, for "commercial" dog walkers, which even the dog walkers' associations supports.

With respect to the \$800,000+ to implement and enforce the recommended new policies, may I respectfully suggest that these funds could be used more effectively for other purposes-better bathrooms, signage for humans, more poop bags, water fountains for all species, for example.

With proper enforcement of existing laws, public education, and better signage, dog lovers and non-dog lovers can coexist. As Ann Landers used to say, if it ain't broke, don't fix it. A bit of tinkering to improve things would be welcome, but to radically change policy because of a very small minority of abusers is impermissible for banning an entire constituency of recreational park users-dog owners and walkers-from the GGNRA.

Thank you.

Correspondence ID: 3131 **Project:** 11759 **Document:** 38106
Received: May,22,2011 14:33:01
Correspondence Type: Web Form
Correspondence: Dear GGNRA Supervisors:

I would like to comment on the Draft Plan/Draft Environmental Impact Statement for Dog Management in the GGNRA and go on record in support of the "No Change" Alternative "A" and the continuance of the 1979 Pet Policy on access for people with dogs. For the past ten years I have been walking dogs at Muir Beach, Crissy Field, Rodeo Beach, Ocean Beach, and Oakwood Valley, on and off-leash in compliance with prevailing regulations.

I believe I am a responsible dog walker- I carry a waste pick-up bag and a leash for my dog; I clean up after my dog; I don't allow my dog to harass other persons, animals or wildlife; I respect and protect natural resources; I don't allow the dog into restricted areas; and I follow the posted signage. In my experience and observation, the overwhelming majority of dog owners also follow these rules based on common and mutual courtesy. (I do see humans tramping in areas marked as sensitive habitats, and I see an astonishing amount of trash washing up at these beaches, and on the trails, but I don't believe these can be blamed on the dogs' use of these recreation

areas.)

Moreover, after reading your proposed changes to the existing regulations and looking into the various issues involved, I would like to observe further that, in my opinion, Severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. Target enforcement should be focused upon the small number of people whose dogs misbehave, not on excluding the entire class of people with dogs from most of the GGNRA.

The DEIS continues a trend of GGNRA claims about impacts by dogs on birds that are not supported by the data. There is no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife (snowy plover, bank swallow, etc.). Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impacts. This indicates that assumptions about impacts from off-leash dogs must be tested and proven to be true before they can be used to justify restrictions. Many of the assumptions cited by the GGNRA have not been adequately tested or proven. Dog owners are being held to a standard of behavior that is impossibly high, and significantly higher than any other park users. For example, studies by GGNRA staff routinely show people without dogs "disturb" plovers, but there is no attempt to restrict people without dogs from the beaches where plovers roost (not nest). Focus enforcement on people who do not keep their dog from chasing birds rather than on excluding all people with dogs.

The DEIS is full of impacts of dogs on wildlife and other park visitors that "could" occur, but there is little evidence that these impacts actually do occur. After over ten years of intensive scrutiny of off-leash dogs in the GGNRA, it should be obvious if those impacts really do occur. The lack of data indicates they do not. For example, the DEIS mentions that disease "could" be transmitted to people from unpicked-up dog feces. However there has not been a single case of dog-feces-caused human illness reported by the San Francisco Department of Health for over 50 years. A management policy should not be based on hypothetical impacts.

The level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use

of GGNRA resources. The DEIS states that it will cost nearly \$1million to enforce the Preferred Alternative, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs.

The inclusion of a "poison pill" in the DEIS suggests the GGNRA will use it as an end run to ban off-leash dogs in the near future, bypassing the kind of public process such an action is normally required by law to follow. The DEIS includes a "compliance-based management strategy" that calls for further tightening of the restrictions in a given area if it is determined that less than 75 percent of dog walkers are complying with the new rules over a one-year period and that the GGNRA will change the management of the various areas to the next more restrictive level-an off-leash area will become on-leash only, an on-leash area will become no dogs at all. This section must be removed from any final Dog Management Plan because,

a) This compliance-based management strategy is unfair, because it can only be changed in one direction-toward more restrictive levels of access for people with dogs.

b) There is no provision for public comment in the case of a change in status of an off-leash or on-leash area because of the compliance-based management strategy.

c) How will compliance be monitored? Who will do the monitoring? The GGNRA has repeatedly relied on poorly trained volunteers with a deep-seated bias against dogs to monitor the interactions between dogs and snowy plovers. Why would we expect these compliance monitors to be any less biased? Will their claims of non-compliance be valid? Will the GGNRA resort to the use of surveillance cameras to monitor compliance?

d) This allows a few bad actors to result in the removal of off-leash access everywhere in the GGNRA, even if there are tens of thousands of hours of incident-free dog walking for every single incident. Including a "nuclear option" in a management plan is not good management policy. Regulations already exist to target those who do not control their dogs when they are off-leash. Please target enforcement at those bad actors, not at the huge numbers of dog walkers who do not cause problems.

In short, the "Poison Pill" of a "Compliance-Based Management Strategy" is unfair since it can only reduce off-leash access and not increase access in the future, and is an attempt to circumvent the legal requirement of a public

process when management changes that are significant or highly controversial are made. It will not work and must be removed.

In the legislation that created the GGNRA, the reason for the creation of the GGNRA is listed as "the maintenance of needed recreational open space." Off-leash dog walking is among the recreational activities listed as traditionally occurring in the land that was to become the GGNRA. When dogs are walked in a responsible way (as most are), there is no conflict with the environment or with other park users. Target people not walking their dogs responsibly, but leave the vast majority of us alone.

The 1979 Pet Policy allowed dogs off-leash on less than 1% of GGNRA land. In other words, 99% of all GGNRA land is off-limits to dogs now. There is much-most-GGNRA land where humans will see either no dogs or dogs only on-leash. On the Oakwood Valley trails, for example, I frequently count the ratio of people with and without dogs and it is usually about 12-15 people using the trails with a dog and even at popular times of the day (Saturday morning, for instance), 1 or 2 people walking without dogs.

All evidence points to the status quo as being the best of the options presented in the new proposal. It's the policy in effect since 1979, and over 99% of people and dogs seem to co-exist under current policy with no trouble. I would support some reasonable changes-perhaps new restrictions, such as licenses for dog walking in the GGNRA, and/or fees, for "commercial" dog walkers, which even the dog walkers' associations supports.

With respect to the \$800,000+ to implement and enforce the recommended new policies, may I respectfully suggest that these funds could be used more effectively for other purposes-better bathrooms, signage for humans, more poop bags, water fountains for all species, for example.

With proper enforcement of existing laws, public education, and better signage, dog lovers and non-dog lovers can coexist. As Ann Landers used to say, if it ain't broke, don't fix it. A bit of tinkering to improve things would be welcome, but to radically change policy because of a very small minority of abusers is impermissible for banning an entire constituency of recreational park users-dog owners and walkers-from the GGNRA.

Thank you.

Correspondence ID: 3132 **Project:** 11759 **Document:** 38106
Received: May,22,2011 14:45:46
Correspondence Type: Web Form

Correspondence: I would like to weigh in as backing the proposed control of dogs in the GGNRA. Pet owners, like parents, always think their dog is perfect and see no reason for control. Just the other day, I was leaving an area when a dog ran up, started barking feriously and baring fangs. Meanwhile the owner, who was not able to move very fast at all, is calling the dog. And insisting "he wouldn't hurt anyone." Well, bared fangs do not indicate friendship to me. That is issue number one.

There are numbers of pet owners who do not clean up after their animals, especially if allowed to run off leash. That poses a potential health hazard to all, but especially to children. This lack of responsibility happens in neighborhoods. Can you imagine in a large open space what can happen?

And still one other issue which may develop over time: Though keeping dogs on leash won't totally solve the problem, I can foresee some pets not returning to owners and becoming somewhat feral posing another type of threat over the long term.

I was just in Bryce and Zion Canyons. Dogs are not allowed, and it was great. We go to the National Open Areas to remove ourselves to some extent from all the daily familiar things. It is a chance to live a little more freely.

Correspondence ID: 3133 **Project:** 11759 **Document:** 38106

Received: May,22,2011 14:51:38

Correspondence Type: Web Form

Correspondence: I do not believe there should be any additional pet restrictions on the areas mentioned. Only about 1% of the GGNRA is open to dogs off leash. Over the past 20 years, I have seen areas gradually placed off limits to dogs: Drake's Beach, Limantour, Black Sand Beach. I believe these areas should be open to dogs off leash provided that they are under voice command and the owners clean up after the dogs.

There should be a fair balance between protecting wildlife and the taxpayers' right to exercise their dogs in open space in the GGNRA. I fail to see how the balance of nature will be upset if my labrador retrieves his tennis ball in the water at Drake's Beach.

Correspondence ID: 3134 **Project:** 11759 **Document:** 38106

Received: May,22,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. To help protect these species and other protected

wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Correspondence ID: 3135 **Project:** 11759 **Document:** 38106

Received: May,22,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Halting species loss has economic benefits, says EU

Green Business ; By Christopher Le Coq BRUSSELS | Tue May 3, 2011 11:55am EDT (Reuters) - The European Union should halt the rapid extinction of plant and animal species by 2020 because it will cost less than trying to repair the damage once it is done, Europe's environment chief said on Tuesday.

Worldwide, species extinction rates are between 100 and 1,000 times the natural rate, the European Commission said in its latest biodiversity strategy.

It quoted research estimates that by 2050, \$2-6 trillion in business opportunities could be realized should the private sector invest in preserving biodiversity.

The Commission set a target of halting biodiversity loss by 2020.

It also set a broader goal to restore biodiversity and ecosystem services provided by nature itself, such as air and water purification, by 2050.

"It is a much smarter economic investment to protect the diversity of life and healthy ecosystems ... than face tragedy once diversity has been lost," EU Environment Commissioner Janez Potocnik told a news conference.

The Commission did not provide details on how it hoped to achieve this, but Potocnik hopes a forthcoming overhaul of EU agricultural and fisheries policies will contribute.

In the EU's 27 member countries, 25 percent of animal species are under threat of extinction and 88 percent of fish stocks are seriously threatened.

Without action from business, as well as proper public policies, species loss will inexorably march on, largely through climate change, invasive foreign species and land-use changes.

Though the concept is abstract, the economic costs of continued species loss are real, according to the Commission and environmental campaigning organizations.

Overfishing leads to an annual loss of \$50 billion of income for the industry, according to research by The Economics of Ecosystems and Biodiversity (TEEB).

Biodiversity loss leading to a decline in insect pollination, which is essential in sustaining crops, would have serious consequences for farmers and agribusiness.

The EU executive says pollination has an economic value to the 27-state European Union of 15 billion euros (\$22 billion) per year.

Globally the figure is about 153 billion euros, representing 9.5 percent of global agricultural output for human food, according to TEEB.

But environmental organizations criticized the new 2020 biodiversity plan, noting that it lacks measurable targets.

"The EU's new biodiversity strategy is an important signal of good intentions but it does not have the real power to stop biodiversity loss," said Alberto Arroyo, conservation policy coordinator at WWF.

In March last year, EU leaders recognized their previous 2010 biodiversity objectives would not be met, with species loss continuing unabated.

(For Reuters latest environment blogs, click on:
blogs.reuters.com/environment/)

(Reporting by Christopher Le Coq; Editing by Rex Merrifield)

GREEN BUSINESS

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| Correspondence ID: | 3136 | Project: | 11759 | Document: | 38106 |
| Received: | May,22,2011 22:19:13 | | | | |
| Correspondence Type: | Web Form | | | | |
| Correspondence: | Please adopt option C (the NPS Preferred Alternative) for the GGNRA Dog Management Plan. I am a regular supporter of the Golden Gate Parks | | | | |

Conservancy and a frequent and long-time (over 10 years) volunteer.

The present system cannot continue. Currently, the entire area of Fort Funston, a unique remnant of a great dune system, is being used as a dog park, with use by humans and their dogs given priority over every other use of that park. While the dogs can aid in the enjoyment of the park, they also unavoidably urinate, disturb the ground cover, tear up seedlings, and threaten and harass wildlife. I have found large areas dug up by dogs under inadequate control. Furthermore, while most owners make some attempt to clean up their dog's feces, many miss doing so, particularly when the dog has gone off trail. Finding that I've knelt in a pile of dog droppings while trying to remove a patch of weeds negatively impacts my experience of the park.

There are two particularly critical items in the proposal. - The first is the limit on numbers of dogs that can be walked by an individual, and the numbers that can be walked off leash. My many days spent at Ft. Funston have left me convinced that the majority of damage done by dogs is done by the large packs with a single walker or two. Many of these are professional dog walkers, and their use of the park is frankly exploitive. - The second is the implicit recognition that traffic should be restricted to the trails, as in any park. I think that most people, and even most dogs, recognize this, but many still do not. Educating people on the value of the park, and teaching them to respect it by respecting the trails, is in the long term the only way to protect the park.

My personal preference would be one of the options with more extensive protection for the natural landscape and wildlife; however, I realize that that a variety of groups have a stake in the GGNRA and a reasonable desire to be accommodated. I appreciate the work that all parties have put into developing this plan, but please remember that the stakeholders in the park include a large community of flora and fauna. They can't attend meetings and rely on us to represent them.

Regards, John Anderson

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| Correspondence ID: | 3137 | Project: 11759 | Document: 38106 |
| Received: | May,22,2011 22:35:37 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I have only recently moved to Pacifica two years ago, and one of the things that drew me to the town was large number of trails available for trail running with my dog. My dog is always on leash at all times while we're running anywhere, and that includes inside the GGNRA. I would ask that you continue allowing on leash dogs at: Mori Point, Sweeney Ridge (the | | |

entire thing), Lands End, Montara Mountain, and Ocean Beach. These are some of the largest areas people that own dogs have to walk them, and if you take them away it'd be a travesty.

I'd also to encourage you to think about loops in your trails. In some of the Marin trails for example, due to the dog walking restrictions, you have to either back track or disobey the law in order to actually complete the loop. This is also what you propose doing on Sweeney Ridge. Loops are important because you can then choose which direction to traverse them. For example, if I had to do the sweeney ridge loop from Fassler Ave to the Shelldance Orchid trailhead, my knees would give out on the steep section above Shelldance. It's very important to run up that steep part and down the more gradual side at Fassler.

Please take this into consideration. I'd like all the areas in Pacifica to remain on-leash only as they already are. I think in Pacifica we may have a larger percapita number of dog owners (from what I see anecdotally) so I do believe this is in the public interest of our town.

Thanks,

Clint

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| Correspondence ID: | 3138 | Project: 11759 | Document: 38106 |
| Received: | May,22,2011 22:47:41 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I strongly support Alternative B (the preferred alternative) for the San Mateo County properties. In addition, specifically for Rancho Corral de Tierra, a new land soon to be acquired by GGNRA, I strongly support on-leash dog walking ONLY. I hike regularly in this area and off leash dogs are a public safety hazard. On numerous occasions, I have nearly been attacked by off leash dogs. This is a very frightening experience and significantly interferes with my enjoyment of this beautiful land. As many dogs currently roam off leash on this property, the on-leash law will need to be strictly enforced once GGNRA begins to manage the land. I would not want to completely ban dogs from this property as many members of the dog walking community in this area do keep their dogs on leash and pick up after their dogs. However, in my 13 years of experience hiking in this area, voice control DOES NOT WORK for many dogs and should never be allowed on any of these lands. Aggressive dogs can cause significant safety hazards and limit the enjoyment of others who want to use the land without fear of being attacked by a dog. These off leash dogs also do significant damage to trails and foliage, scare and chase other natural animals in the habitat (birds, rabbits, etc) and generally create havoc in the entire natural environment. | | |

Thank you for taking my comments into consideration.

Correspondence ID: 3139 **Project:** 11759 **Document:** 38106
Received: May,22,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3140 **Project:** 11759 **Document:** 38106
Received: May,22,2011 23:14:46
Correspondence Type: Web Form
Correspondence: I SUPPORT YOUR EFFORTS TO BETTER MANAGE DOGS IN THE PARKS! As a San Franciscan with a small child, I am tired of vying for open space with rough, unleashed, unruly dogs. I am tired of dog poop everywhere. There are way too many irresponsible dog owners, and they have a negative impact on our parks. In the last few weeks, I have noticed dog poop all over Ocean Beach (at Lawton). In April I watched an off-leash dog, at least a hundred yards from its owner, pee on another beach goer's bike and teeshirt!! And on Mothers Day in Golden Gate Park an unleashed dog ran over our picnic blanket. My 3 year old is scared of dogs. Can you blame her?

Sincerely, All Dogged Out

Correspondence ID: 3141 **Project:** 11759 **Document:** 38106

Received: May,22,2011 23:55:27

Correspondence Type: Web Form

Correspondence: I think it would be a mistake to eliminate off-leash options at Fort Funston. So many dog owners take advantage of this resource. And having a site like Fort Funston where dogs are welcome means fewer dogs at other sites. This allows people who don't want to be bothered by dogs to avoid dog-friendly sites like Fort Funston. If restrictions are put into place, there will be no incentive for dog owners to congregate to Fort Funston. This will put more dogs in all of the GGNRAs and will very likely increase complaints about dog interactions.

Also, it's fair to say that humans are the ones who cause the most impact to the natural resources. You know that the most protective solution is to not allow anyone in these areas. But to balance that against allowing them to be used by the public, you must necessarily accept some impact. I'm all for restricting access to certain sensitive areas. But let's not pretend that putting dogs on leashes is going to substantially reduce impact. Perhaps if you also required children to be on leash, that might help.

I drive my dogs up to Fort Funston regularly. We also stop to do shopping while up there in Daly City. If you close this down, I'll likely take my dogs to Pulgas Ridge, and of course my consumer dollars as well.

Correspondence ID: 3142 **Project:** 11759 **Document:** 38106

Received: May,23,2011 02:31:55

Correspondence Type: Web Form

Correspondence: Please be sure to address the options for changing who manages the GGNRA. I believe national recreational areas can be managed by organizations other than NPS. Thus, NPS restrictions should not be imposed upon GGNRA. If need be, how do we change who manages GGNRA (e.g., Forestry Service)?

Correspondence ID: 3143 **Project:** 11759 **Document:** 38106

Received: May,23,2011 02:35:55

Correspondence Type: Web Form

Correspondence: Your DEIS states that reducing dog activity is beneficial. Then, why not open more lands to dogs (on and off leash). By your arguments, this would reduce the impact on current dog areas. Unless you believe that all dog use should be eliminated, then this "dilution" by open more areas should be

better than the current situation (by your own DEIS arguments).

Correspondence ID: 3144 **Project:** 11759 **Document:** 38106

Received: May,23,2011 11:08:40

Correspondence Type: Web Form

Correspondence: I am in support of the preferred alternative for the Dog Management Plan. As a frequent user of the park, I have witnessed dog owners allowing their dogs to poop as they please, and run through areas roped off to protect vegetation. In one instance when I confronted a dog owner about cleaning their dog poop (on Crissy Field, one of the areas that will be open to off leash dogs) the owner responded by saying he did not think it was illegal to not clean up after his dog; I could not respond politely so I stared at him.

I have also experienced plenty of well dressed SF residents not cleaning up their dog poop on the block of which I live. I feel that many of the dog owner groups are very selfish and do not take in account other user groups. I do not visit Fort Funston because of the dog walkers, and the random dogs running around under "voice control" and falling off cliffs, attacking other dogs, and running up on people who are not comfortable around dogs.

I am also concerned for user groups that have not organized as well as dog "custodians" and may get overlooked in this process. I am able bodied, and have experience with dogs, so I am not scared, I am more annoyed by off leash dogs, yet I can see people who are not stable on their feet, or those who are not used to dogs, could be knocked over or intimidated by dogs that people think are under voice control, and may not be dangerous, but are perceived as such by non-dog owners.

Please protect the resources, and other visitor groups while allowing more liberal dog laws than any other national park.

Correspondence ID: 3145 **Project:** 11759 **Document:** 38106

Received: May,23,2011 13:03:43

Correspondence Type: Web Form

Correspondence: I am against the proposed on-leash areas for Fort Funston. This area is and has been a wonderful resource for walkers, dogs and their owners. I would support the alternative given on Map 16E. It's expansive land area for off-leash dogs could accommodate walkers and dogs of various abilities.

Correspondence ID: 3146 **Project:** 11759 **Document:** 38106

Received: May,23,2011 14:46:40

Correspondence Web Form

Type:

Correspondence: I am not a dog owner, however I am very sympathetic to the needs of dog owners and their desire to have areas where they and their dogs can walk and play off-leash. I believe it would be a mistake to further limit the very small areas in the GGNRA that today allow off-leash dogs.

I believe deeply that we need fewer and more thoughtful rules to govern the use of our open spaces. It is disturbing to me that there are 2400 pages of documents posted, as well as countless hours and no small amount of money associated with this initiative, with the promise of many more hours expended and many more dollars spent to solve what I do not think of as a problem.

I have spent on average one hour per week at Crissy Field over the past 18 years that I have lived in San Francisco (both before and after its rebirth), and I have only rarely witnessed issues between dog owners and non-dog owners. Therefore, I think that Alternative A is the best choice for this area. In general I favor the most dog-friendly environment possible for all of these areas, but I do not use most of the other areas regularly and so do not have specific comments.

It also seems to me that creating an enforcement regime that closes all off-leash areas permanently in the event of a certain amount of observed non-compliance is somewhat punitive and unprecedented. I did not see a baseline of compliance today, but perhaps I missed it in the 2400 pages. In any event, it seems to represent a bias on the part of a bureaucracy that does not want to see off-leash dogs, and I believe that it should be stricken. If there is substantial non-compliance with the rules (whatever rules are adopted), then we should revisit the rules as a community, not simply revoke them and default to a more restrictive scheme "permanently."

Thank you for the opportunity to comment and your consideration.

Correspondence ID: 3147 **Project:** 11759 **Document:** 38106

Received: May,23,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean:

I am writing as a concerned citizen regarding the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area. I use and enjoy the GGNRA lands and am concerned about impacts from dog-related recreation on the wildlife,

habitats and other park users at the park.

I strongly encourage you to improve the plan by implementing the following steps:

1. All "Regulated Off-leash Areas" should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. Fences provide more security for all park users and create clearer boundaries so that dog owners are aware of how to comply with park rules.
2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance.
3. Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it.
4. At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs.
5. While dogs are important parts of some families and communities, they are just one animal that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.
6. And finally, as a nurse with many years experience in a busy local urban ER, I have seen the real damage that dogs can do. And it is almost always a huge surprise to the dog owner. They always say something like: "he's never done that before!" So as a public safety policy, I strongly encourage you to place more reasonable restrictions on dogs, and to not crump to the pressure of the loud but minority opinion dog lobby.

Thank you for this opportunity to comment on the Dog Management Plan.
Sincerely, Matt Cullinane, R.N.

Correspondence ID: 3148 **Project:** 11759 **Document:** 38106
Received: May,23,2011 15:30:54
Correspondence Type: Web Form
Correspondence: Mr. Frank Dean General Superintendent Golden Gate National Recreation

Area Building 201 Fort Mason San Francisco 94123

May 23, 2011

Re: Dog Management Plan

Dear Mr. Dean,

I am a long-time volunteer in the Golden Gate National Recreation Area. I have surveyed rare plants as a consultant throughout the GGNRA, including Fort Funston, and volunteered in habitat restoration for more than 25 years. I have had extensive contact with dogs as a result.

When I began restoration at Fort Funston, there were no dogs to speak of on the bluffs. We encountered dogs on the beach. They were most interested in playing in the surf and catching balls thrown by people. However, due to the extensive amount of feces found in the ice plant at the base of the cliffs, Park personnel decided we should no longer work there. We proceeded to clear the bluffs of ice plant and plant natives grown in the Tennessee Valley nursery, now at the nursery at Fort Funston.

My last contact with Fort Funston was as a rare plant surveyor. I had several encounters with dogs and none of them were pleasant. I was sitting in a fenced-off area just above a small parking lot south of the main entrance to the Fort when a large chow, off-leash, rushed at me barking and growling. His owner did not restrain the animal at all. Later I was bit by a dog as its owner watched, explaining that the dog did not like clip boards. At no time when I was censusing plants did I see any Park police. I also observed an Asian couple with a small child walking along the paths attempting to enjoy the Park. The child was no more than three feet tall and large dogs, easily her height and up to 50 pounds, were barking at her and jumping towards her. The family gathered themselves bravely and left. This is not the sort of experience visitors should encounter when they visit the park.

I also worked at Crissy Field removing ice plant before the Presidio transferred to the Park Service and Trust. After the lagoon was built and restoration of the entire area had commenced, I went back to see what had transpired. I found dogs in the lagoon chasing birds. Signs at the Clapper Rail area were posted with no entry signs, yet dogs were chasing each other inside the enclosure and the owners paid no attention. Again I saw no Park police.

The Headlands has been spared the worst of the transgressions by dogs, although they are not immune. I frequently see off-leash dogs in Tennessee Valley and on trails. When a group is working on restoration and carrying tools coming on dogs is problematic as they sometimes bark and act

aggressive, presumably because they don't like tools. Police are very infrequent visitors to Tennessee Valley and are not likely to be found on the more remote trails.

I don't understand why one type of commercial operation is allowed to use public land for financial gain and not all others. If I were to set up a small stand in Lower Tennessee Valley, I'm sure Park personnel would have something to say. But because it is difficult to distinguish between people walking family dogs and commercial dog walkers, the Park is taking the easy way out by not limiting the commercial operators or banning them entirely.

In short there are far too many encounters with dogs that are unpleasant and frightening, lessening the pleasure of our beautiful Park significantly for the benefit of a few.

Therefore, 1. I prefer to follow the national guidelines for pets in national public lands (Alternative B). It sets a dangerous precedent to enact a variance from federal regulations. The only variance I would consider is off-leash dogs on the beaches, with the exception of Muir Beach due to the possibility of full restoration there. I have one further exception at Fort Funston I offer below. If absolutely necessary, with no possibility of back-sliding by Park personnel, I reluctantly support Alternative C. 2. No dogs should be allowed off-leash outside designated fenced areas. Owners and walkers have not demonstrated the willingness to consider the feelings and enjoyment of others. 3. No one should be allowed in the park with more than three dogs. More than three implies a business and the Park should not promote one business over others. Given the Park's inability to control dogs now, monitoring dog walkers for permits and licenses is highly unlikely to occur. 4. Voice control does not appear to work, or if it does, the owners/walkers refuse to use it as a control mechanism. Therefore, it should be removed as an acceptable means of curbing dogs. 5. The area near the main parking lot at Fort Funston has been completely destroyed by dogs. No plants grow. It is nothing but bare earth. It is very ugly, but, having destroyed an area where *Chorizanthe cuspidata* var. *cuspidata* (a rare plant) was found when I censused the area in the 1990s, it should be fenced and dogs allowed to roam the enclosure without restraints. In all other parts of Fort Funston dogs should be on leash and on trails. Having worked with others for years to restore the bluffs to native conditions, dogs should not be allowed into the protected areas. Staff and volunteer efforts to fence off sensitive areas have been compromised to allow dogs access to planted areas. Keeping them on leash will ensure that the thousands of hours of volunteer efforts to restore the Park will not be wasted. Just because we're free doesn't mean our labor shouldn't be valued. 6. The reason there is "public confusion" about dogs in GGNRA is the result of Park staff not enforcing federal guidelines. We had horrendous problems with bike riders

in the Park for the very same reason. That resulted in riders ignoring road rules, racing down roads at high speeds (and believe me, it's hard to get out of the way of a bike going 25 miles an hour while carrying pulaskis, weed wrenches and hand picks) and building private roads through remote parts of the Park. If one group is allowed to ignore rules it sets a precedent for others to do so. 7. The reduction of "public confusion" is the sole responsibility of the Park Service and must be vigorously carried out by signage and handouts, as well as warnings on the Park Web site. There is no excuse for permitting lawlessness to continue. And why should I work so hard to restore parkland, if the Park staff is going to allow it to be destroyed?

When we venture out into wilderness areas we are instructed to not create new paths so that impacts are minimized; dogs need to do the same. The Wildlife Protection Areas need to be just that; not the bathrooms of canines. This is not supposed to be for the benefit of the few. Park staff is charged to protect and preserve these lands for this and future generations. I do not want my descendants cleaning up and replanting after insensitive commercial operations. They can walk dogs on city streets just like every other operator does in every other community.

I greatly support a return to national standards; that is my first choice, with Alternative C a distant second. I have not seen the Park Service enforce other regulations in the Park and I am skeptical they will do so in this case. Having been bitten and threatened by dogs, I have little sympathy for commercial dog operations in Parks. A beautiful park is our legacy to future generations, not piles of poop and bare ground where rare and beautiful plants and animals once thrived.

Thank you for the opportunity to comment on this very important document.

Dale Smith Habitat Restoration Team Golden Gate National Recreation Area

Correspondence ID: 3149 **Project:** 11759 **Document:** 38106
Received: May,23,2011 15:32:08
Correspondence Type: Web Form
Correspondence: To: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

From: Matthew Zlatunich San Francisco, CA 94118

Dear Superintendent Dean,

I write in support of adopting a Dog Management Plan for the GGNRA. I have

been following this issue for many years, have reviewed the Draft DEIS and attended one of the public open house sessions.

My interests in the GGNRA are as a lifelong resident of San Francisco, a frequent park visitor and a volunteer participating in wildlife monitoring and stewardship activities. I enjoy the park for the unique opportunities to experience the natural and cultural resources and I appreciate the values of our National Park System.

I concur with the assessment that the natural and cultural resources and park visitor experiences have been and continue to be negatively impacted by the presence of substantial quantities of domestic dogs, both on-leash and off-leash, within the GGNRA. On many occasions my own park experiences have been negatively affected by the presence of dogs. I have had personal conflicts with dogs and their owners/guardians as well as being witness to conflicts between dogs and wildlife.

While I am supportive of many aspects of the Preferred Alternative, I have the following comments to offer:

-- General Comments --

Commercial dog walking should not be allowed. Commercial dog walking does not relate to the purpose and mission of the National Parks. Commercial dog walking provides no service or benefit to park users, has negative impacts on park resources and park visitors, and serves only for the capital gain of private enterprises at the expense of the American public.

Commercial dog walking will require additional annual expenditures for administering and overseeing a permitting process, additional law enforcement, additional resource maintenance and additional public relations.

The DEIS estimates that over 1000 dogs will be commercially walked within the GGNRA daily (p. 63 p. 276). Commercial dog walkers, with up to six dogs, will negatively impact the experience of park visitors on trails and in other areas of the park. If permitted, commercial dog walking activity will increase within the GGNRA and will displace park visitors, of all legitimate user groups, from areas of the park. Commercial dog walkers will dominate the ROLAs, displacing other park visitors. Commercial dog walking vehicles will occupy parking spaces resulting in fewer spaces available for park visitors. If allowed, commercial dog walking operations will have a dominant presence in some areas of the park thus affecting the overall character and ambiance of those areas.

Currently, commercial dog walking is not permitted within the GGNRA or any other National Park unit and there is no justifiable reason to do so. The NPS is

well within the scope of its management directives to not allow commercial dog walking and I support this position.

Off-leash areas should be well defined and be contained by a physical barrier. It can be assumed that off-leash dog recreation will be the primary activity within any established ROLA. ROLAs should be well distinguished by physical barriers and adequate signage so that all park visitors can choose whether or not to enter the area.

Park visitors should be limited to one dog per visitor. On trails, visitors with more than one dog have a wider space requirement and have the potential to impact other park visitors by impeding their progress along the trail. In ROLAs, it is not practical to allow voice control of more than one dog per person. With few exceptions, dog handlers are not capable of managing more than one off-leash dog at a time.

The proposed compliance percentage of 75% is too low. Given that many hundreds of dogs are walked within the GGNRA daily, a 25% non-compliance tolerance would create a situation where park resources are significantly negatively impacted. The expectation should be that non-compliance is a rare occurrence and the compliance strategy should reflect that in its standard. The standard of compliance should be the same as for any other park rule or law. An acceptable rate of compliance is somewhere near 100%.

A simple and effective reporting system should be established. The dog management plan should include a means by which park visitors can easily and effectively report non-compliant behavior. Park visitors are sometimes reluctant to report observed violations due to the time involved in making the report. A public reporting system should be incorporated into the plan that will be user friendly and workable. Such a system should require only a few moments of time and be an effective documentation of the violation.

The plan does not provide an adequate amount of hiking trails and picnic areas where visitors can enjoy a dog-free, National Park quality experience. Within San Francisco, the plan provides no significant area where park visitors can spend the day hiking and/or picnicking in a dog free environment. A solution to this problem would be to designate all of the coastal bluff areas, from the Golden Gate Bridge to and including Baker Beach, as a dog-free zone.

Wildlife viewing is a popular activity throughout the GGNRA. Wildlife viewing should be included as a visitor activity for Crissy Field. (p. 276 & table 9).

Snowy Plovers ?

Nesting records. The DEIS states that there is no record of nesting (p.1240). However, there are records of bird and egg specimens collected during nesting

season. Grinnell, 1932, identifies the Presidio as the type locality for the Snowy Plover with a collection date of May 8, 1854, a date that falls within the known nesting season for the species. Also, Smithsonian Institution collection data documents an egg specimen from San Francisco. See <http://collections.nmnh.si.edu/search/birds/>

Potential nesting site. The DEIS fails to acknowledge that the USFWS Snowy Plover Recovery Plan has identified Crissy Field as a potential expansion site for snowy plovers; see USFWS Recovery Plan pp. 43/44. Natural & Cultural Nexus. The Presidio of San Francisco is the type locality for the Snowy Plover, collected by Lt. William Trowbridge (Army Corps of Engineers, U.S. Coastal Survey), on May 8, 1854 (Grinnell, 1932). Trowbridge is also responsible for construction of the Golden Gate Tidal Gauge, which began operation in June of 1854 (Nolte, 2004). Given the location of the tidal gauge, it is quite possible that the type specimen was collected from what is now the Crissy WPA.

Species of Concern ? The DEIS does not fully describe the sensitivity of some habitat areas including Ocean Beach and Fort Funston. The plan considers species listed under the Federal and State ESA's but does not sufficiently describe non-ESA species of concern as listed by the IUCN, the American Bird Conservancy, National Audubon, and locally known species of concern. Species of local concern include:

Allen's Hummingbird Black Turnstone Brant Bryant's Savannah Sparrow
Burrowing Owl California Thrasher California Quail Clarks Grebe Elegant Tern
Heermann's Gull Hermit Warbler Loggerhead Shrike Long-billed Curlew Long-
eared Owl Marbled Godwit Northern Harrier Nuttall's White-crowned Sparrow
Nuttall's Woodpecker Olive-sided Flycatcher Pelagic Cormorant Red Knot
Sanderling San Francisco Common Yellowthroat Short-billed Dowitcher Snowy
Plover Surfbird Thayer's Gull Tricolored Blackbird Varied Thrush Wandering
Tattler Western Sandpiper Whimbrel Wrentit Yellow Warbler

The EIS should estimate the actual number of incidents that occur within the GGNRA. Table 6 (p. 230) indicates the recorded incidents involving dogs in 2007 and 2008. It is stated that these numbers of incidents of visitors not complying with dog walking regulations is not equal to the number of actual violations occurring at the park. Being that many violations occur which are not observed or un-reported, some estimate of the total amount of violations should be included in the EIS such that each documented violation would be representative of a certain amount of actual violations.

--Sites Specific Comments--

Ft. Mason ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater,

and establishment of a simple and effective reporting system.

Crissy Field WPA ? The DEIS indicates that the east boundary fence will be relocated 200 feet eastward at a position 900 feet from the NOAA pier (p. 60). The language of the plan should allow the National Park Service flexibility in determining the exact location of the fence and consideration should be given to the visual penetration effect as well as the geographical conditions of the immediate area.

Under the preferred alternative, off-leash dog activity directly adjacent to the east boundary fence will pose a visual threat that will penetrate into the Wildlife Protection Area, effectively rendering a portion of the eastern WPA as non-viable habitat during daytime use hours. Given this concern, the fence should be placed a reasonable distance eastward, beyond the actual 900 foot border line, to allow for an adequate buffer zone.

Additionally, the geography of the area of fence placement is somewhat complicated by non-uniform conditions which include a variety of substrates, varying elevations, several lobes of fenced dune habitat areas, and a variety of pedestrian pathways. Consideration should be given to all of these conditions and fence placement should accommodate ease of pedestrian traffic flow while maintaining adequate protection of the WPA. When installed, the fence should extend to the water at extreme low tide.

Crissy Central Beach ? The Central Beach ROLA should be fenced and gated. Fences at the west and east ends should extend to the water at extreme low tide. Adequate buffer zones (~300ft) should be included beyond the west and east boundary fences to protect the WPA and the lagoon outlet from the influences of excessive dog play activity. Access points from the promenade should be gated. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Crissy East Beach ? Fencing should be installed to protect the lagoon outlet zone. Outlet areas from bodies of water into bays or oceans are of high habitat value. The outlet zone should be included as part of the protected lagoon area and similarly fenced.

Crissy East of the Lagoon ? The Freshwater Swale should be designated as a no dog zone.

Crissy Promenade ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Airfield ? The foot paths that cross the airfield are multi-use trails and should be designated as on-leash areas. Allowing off-leash dogs on the airfield

trails will lead to user conflicts.

The airfield ROLA should have some type of physical barrier along the boundaries. A physical barrier will clearly define the ROLA area. Clearly defined boundaries will maximize compliance and minimize conflict. Consider a movable barrier that can be set up and taken down as needed. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

The eastern portion of the airfield should be a no-dog area. The Crissy airfield attracts a wide variety of grassland bird species, including rare vagrants, and is a popular venue for wildlife viewing.

The following bird species have been observed using the Crissy Airfield as a foraging and/or roosting habitat in recent years:

Canada Goose Greater White-fronted Goose Snow Goose Cackling Goose
Mallard Red-tailed Hawk Cooper's Hawk American Kestrel Great Blue Heron
Great Egret

Cattle Egret Killdeer Black-bellied Plover Pacific Golden Plover Black-necked
Stilt Least Sandpiper Wilson's Snipe Barn Owl Northern Flicker American
Crow

Common Raven Black Phoebe Say's Phoebe Horned Lark Barn Swallow Bank
Swallow Cliff Swallow Northern Rough-winged Swallow Tree Swallow Violet-
green Swallow

American Robin European Starling Red-throated Pipit American Pipit Yellow-
rumped Warbler Song Sparrow White-crowned Sparrow Savannah Sparrow
Vesper Sparrow Clay-colored Sparrow

Lapland Longspur Western Meadowlark Brewers Blackbird Tricolored
Blackbird Red-winged Blackbird Brown-headed Cowbird House Finch
American Goldfinch Lesser Goldfinch House Sparrow

Ft. Point ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system. Baker Beach ? The Preferred Alternative for Baker Beach is problematic for several reasons. Splitting the beach into leash-only and no-dog areas will lead to confusion, non-compliance, visitor conflict and continued management problems. Furthermore, allowing dogs near the creek outlet, an area often used by shorebirds, will increase the potential for wildlife conflicts. As a means of eliminating these problems and of creating more opportunities for visitors to enjoy dog-free National Park experiences, I suggest designating the entire Baker Beach area as

a dog-free zone.

Lands End ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Sutro Heights Park ? I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Ocean Beach ? I support the Preferred Alternative for Ocean Beach. To improve upon the Preferred Alternative, I suggest using symbolic fencing and adequate signage to delineate the south border of the ROLA. A simple post and cable fence could be placed along the border from the sea wall to the plover sculpture. A well defined border will help to reduce compliance problems and visitor conflict. Additionally, I suggest changing the name "Snowy Plover Protection Area" to "Wildlife Protection Area". A designation of Wildlife Protection Area would be inclusive of all wildlife species that use the beach habitat area.

Ft. Funston ? I support the Preferred Alternative for Ft. Funston with the exception of allowing dogs on the beach. To improve upon the Preferred Alternative, I suggest not allowing dogs on the beach. The beach at Ft. Funston is used by a variety of shorebird species. Allowing dogs on the beach will result in dogs chasing shorebirds, which is not appropriate in a National Park. I support installing a fence, with access gates and adequate signage, along the border of the ROLA north of the main lot. A borderline fence will clearly delineate the boundary of the ROLA and will minimize compliance problems and visitor conflict. Signs should be posted that clearly identify the area as an off-leash dog play area and that state the voice and sight control rules. Additionally, I suggest aggressively restoring the coastal scrub habitat throughout Ft. Funston. Plant and animal species, as well as park visitors, have been displaced from Ft. Funston over time as dog play activities have increased. A proactive effort must be made to bring back the visitors who are interested in proper stewardship of this area of the park.

Grinnell, Joseph. 1932. Type Localities of Birds Described from California, University of California Publications in Zoology, Volume 38, No. 3, pp. 243-324.

Nolte, Carl. 2004. San Francisco Tides of History, San Francisco Chronicle, June 28, 2004.

ID:

Received: May,23,2011 16:14:29

Correspondence Type: Web Form

Type:

Correspondence: I appreciate the work that has been done by GGNRA on the dog issue. I support the preferred alternatives (shaded areas in the plan). I believe they represent a balance between the needs of dog walkers and those that come to parks to enjoy a dog free experience.

I feel it is especially important to protect the beach areas. I have witnessed many instances where off-lease dogs chase down sea birds that are foraging in the surf.

Thanks

Dan

Correspondence ID: 3151 **Project:** 11759 **Document:** 38106

ID:

Received: May,23,2011 16:30:18

Correspondence Type: Web Form

Type:

Correspondence: I don't have exact figures to represent the number of beaches left that dogs are allowed on at all let alone off leash but as a dog owner I can from experience say that it seems that only one in five California beaches allow dogs on or off leash and only one in 20 allow dogs off leash. I feel that seems unfair. We consider our dog as part of the family and try to plan our close-to-home vacations with the dog in mind. We love the outdoors - camping, hiking and going to beaches. Back country trails do not allow dogs at all so our outdoor excursions are usually limited to places where the dog can be with us. Because of the limitations, the only beaches locally are Fort Baker, Muir and Carmel Beach. Carmel Beach doesn't seem to have any problems with having dogs off or on leash on it's beach, why is it such a problem for you ? We hope you will reconsider such a wide sweeping elimination of dog friendly beaches and keep at least one open for dogs off leash and on voice control.

Sincerely, Oola Mar

Correspondence ID: 3152 **Project:** 11759 **Document:** 38106

ID:

Received: May,23,2011 18:18:01

Correspondence Type: Web Form

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Correspondence: My comments only address the portion of the Draft Plan that pertains to Muir Beach.

The data presented in the Draft Plan does not support Alternative D being designated as the Preferred Alternative. Alternative D would ban dogs playing off-leash in the surf and on the sand at Muir Beach. The data presented in the Draft Plan only supports Alternative Plan A, the No Action alternative. The data, itself, however, is deeply flawed as is the methodology used in the Draft Plan as regarding Muir Beach.

It is true that there some people dislike or fear dogs. That is why almost every beach in Marin County either prohibits the presence of dogs or dogs being off-leash. But the people of Marin have designated Muir Beach as the one small conveniently located beach where their Labrador retrievers, golden retrievers, and other dogs can play in the surf and run on the sand. Dogs have been allowed off-leash at Muir Beach for more than 150 years. The Draft Plan does not provide any compelling reason why the National Park Service (NPS) should interfere with this long-standing right of the people of Marin County to let their dogs enjoy the beach.

Has the National Park Service received hundreds of letters and complaints in the last ten years complaining about dogs on Muir Beach? The answer is "no." The impetus for changing the status quo does not come from the people who frequent Muir Beach; rather, it comes from NPS personnel who probably do not even live in Marin Country. Though Muir Beach is primarily used by the locals in Southern Marin County, did the authors of the Draft Plan ever conducted a scientific survey of the people who actually use Muir Beach, especially on a regular basis, to determine whether they want dogs prohibited from being off leash on the beach? No, they did not. The attitudes of people in faraway counties who rarely or never go to Muir Beach are irrelevant to the future of Muir Beach.

Worse, the authors of the Draft Plan make general statements about the effects on dogs on distant ecosystems and then attempt to extrapolate their conclusions to the situation at Muir Beach. But they provide no baseline data showing that allowing dogs off leash at Muir Beach have ever been a problem, and no data showing that any problems are worsening at an accelerating pace.

If you had been writing a Draft Plan for an area that had never permitted dogs before or never permitted dogs to be off-leash or an area where the number of dogs has been greatly increasing in recent years, your Draft Plan might have merit. But this is not the case regarding Muir Beach. Dogs have been allowed off leash at Muir Beach for well over 150 years, the correct way to have done environmental impact study would have been to compare Muir Beach to a number of matched controls (i.e. similar small beaches, both in physical attributes, climate, and usage) that do not permit dogs to be off leash. There was no reason to speculate whether dogs might cause

irreparable damage. You should have collected and analyzed actual data before writing your conclusions. Why didn't you do this? Is it because the Park Service first decided to ban dogs on Muir Beach (the impetus possibly being the conflict between the Park Service and dog owners in the city of San Francisco) and then had to justify its decision?

The third major problem with the Draft Plan as regards Muir Beach is that the authors assume they are supposed to protect a priceless work of art and each blade of grass and every individual plant must be protected or the entire artwork will be irreparably damaged. In actuality, it does not matter if dogs sometimes harm an individual plant; the ecosystem, as a whole, is under no threat. The authors are using the wrong standards for deciding how to protect Muir Beach.

Water quality in the ocean off Muir Beach is very good; pollution due to dog waste is not a concern. Water quality in Redwood Creek is affected by run-off and human activities; there is no evidence that the presence of dogs has impacted the water quality of the creek. Salmon and steel head trout do not spawn in the Muir Beach lagoon; they spawn much further upstream. If more than 30 giant brown bears concentrated in stretches of Alaskan rivers do not deter salmon and steelheads intent on spawning upstream, the occasional golden retriever frolicking in the Muir Beach lagoon is not going to have an impact.

If the Park Service has to take action at Muir Beach, just restrict dogs to being on leash in the parking lot and the boardwalk leading to the beach. Restrict dogs from being in Redwood Creek, and if necessary, build better fences around the lagoon and the dune. The purpose of such fences would not be to ensure no dog ever enters an area where it does not belong; the purpose would be to ensure there are not so many dogs in the area as to cause irreparable harm.

And if there times of the year when the presence of dogs threatens the breeding habitat of migrating birds, then just prohibit the presence of dogs during that limited period. The East Bay Regional Park Service can successfully do this.

The following are my comments on some of the specifics of the Draft Plan and Plan D, your "Preferred Alternative." Language from the Draft Plan is shown in italics. My comments either follow the italicized text or inside of brackets within the italicized text.

The plan states that, "A plan/EIS is needed because Golden Gate National Recreation Area (GGNRA or the park) resources ? could be compromised to the extent that, without action, those resources and values in some areas of the park might not be available for enjoyment by future generations.

Additionally, a dog management policy inconsistent with NPS regulations and increased public expectations for use of the park for dog recreation have resulted in controversy, litigation, and compromised visitor and employee safety, affecting visitor experience and resulting in resource degradation. The conflicts will likely escalate if not addressed in a comprehensive plan/EIS."

The above statement is totally false in regards to Muir Beach. The Plan provide no evidence that there has been any increase at all at Muir Beach in the last ten years in:

? The number of conflicts between park users with and without dogs ? The number of incidents of fear of dog bites or actual dog bites or dog attacks ? The hours devoted by park staff to manage these conflicts ? The hours devoted by park staff to rescue dogs and owners ? The hours devoted by park staff to dispose of dog waste, educate the public on dog walking policies and regulations and enforce regulations ? That dogs running free in the surf and beach have affected species listed as threatened, ? endangered, or having special-status ? The number of private and commercial dog walkers have increased. ? Without action, those resources and values might not be available for future generations

Environmental Consequences Under Alternative A: No Action, Although this site has high visitor use and low numbers of citations and incident reports related to dog activities, some violations have been documented at the site. Since dogs would be allowed under voice control, there would be a higher likelihood of dogs running, running at higher speeds, and digging in soil. Impacts would occur from dogs disturbing the dunes, soil compaction on social trails and along the banks of Redwood Creek, and nutrient addition to soil from dog waste.

[Dogs have always run free here and dug in the soil. So do children. You provide no data showing that any significant or permanent damage to the ecosystem has occurred after more than 150 years of dogs running free and no data showing an acceleration of damage in recent years. Thus, the data shows there is no reason not to let dogs play in the surf and run on the sand at Muir Beach.]

At this site, the dunes (including a dune restoration area) are located adjacent to the beach and are not adequately protected. Ineffective post-and-cable fencing at Muir Beach discourages visitors from entering the dune restoration area but does not stop off-leash dogs, and lack of fencing at other dune areas does not physically exclude dogs. As a result, alternative A would continue to have long-term moderate adverse impacts on soils because the natural function of the dunes is being disturbed by impacts from dog activities at the site, which can interrupt the natural dune building and

accelerate the natural sand migration processes (NPS 2010b). Beach sand provides habitat, and nutrient enrichment and changes in soil density could result in changes to habitat quality. Digging could change the nature of the sand soil environment and make it less desirable habitat for invertebrates that live in the sand. ?At Muir Beach, commercial dog walking is uncommon. Therefore, commercial dog walking would have negligible impacts on soils.

[You have no data showing that the dogs on Muir Beach in the last 150 years or the last 10 years changed the nature of the natural sand soil environment and made it less desirable for invertebrates that live in the sand. Where is the comparison to a similar beach that has always prohibited dogs? Problems may exist at other beaches with very high dog usage, but there is no problem at Muir Beach.]

[Also, the Draft Plan states "Ineffective post-and-cable fencing at Muir Beach discourages visitors from entering the dune restoration area but does not stop off-leash dogs, and lack of fencing at other dune areas does not physically exclude dogs."

Unlike the Park Service, I actually use Muir Beach. There are many times more people than dogs entering the restoration area and ignoring the post and cable fencing. You do not propose, however, that people be banned from Muir Beach. If the fencing is inadequate to discourage dogs, then just fix the fencing. Put up an attractive four foot high picket fence with a few gates. And if a dog or two still enters the restoration area, so what! Any resulting damage would be temporary and insignificant.

According to the Draft Plan, Alternative A would have long-term cumulative moderate adverse impact on the soil due to soil compaction, erosion, and nutrient addition on trails and pathways, and the dunes would be disturbed. I challenge the Park Service to show data comparing Muir Beach to a similar small beach where dogs are prohibited that supports this spurious conclusion. There is no data supporting the conclusion that nutrient addition from dog waste during the last 150 years at Muir Beach has had a "long-term cumulative moderate adverse impact on the soil." To suggest that Muir Beach dog waste has had this impact is nonsense.]

Preferred Alternative D states that:

On-leash dog walking is based on an allowed 6-foot dog leash. Impacts on soils on the Pacific Way Trail would be negligible, since soils along the trail have been previously disturbed and compacted, resulting in a loss of natural soil function. These soils no longer support the growth of vegetation or microorganisms commonly found in soil. Impacts from dogs would be at such low levels of detection that there would be no discernible effect on

soils or natural soil function. Soils located in the 6-foot areas adjacent to both sides of the trail (LOD area) would receive long-term minor adverse impacts from dogs compacting and eroding the previously undisturbed soils. Nutrient addition from dog waste would also occur; however, impacts would not change the natural characteristics of the soils or natural soil function. Since commercial dog walking activity is not common at Muir Beach, it is likely that the new regulation would not have an impact on the number of dog walkers.

[Alternative A maintains the status quo; it does not increase the presence of dogs. Everything you write about the impact of Preferred Alternative D on the soil is equally true for Alternative A. How can you logically argue that dogs should be allowed on the Pacific Way Trail because the "soils along the trail have been previously disturbed and compacted, resulting in a loss of natural soil function," and then claim dogs should be banned from the beach where they have always run free because they might disturb and compact the soil?]

Turbidity Dogs entering streams, ponds, and lagoons with fine bottom sediments may stir up the sediment and increase turbidity in the water. Excessive turbidity can reduce the ability of sight-feeding fish to capture prey, can smother aquatic eggs, can cause filter-feeding mussels to close up and stop feeding, and can impair the aesthetic value of the water resource. The intensity of the impact on turbidity from dogs depends on the frequency of dogs entering the water body, the persistence of the turbidity, and the degree to which other sources (e.g., runoff from rain events and people wading in the same resources) contribute to the turbidity. All management alternatives other than existing voice-control restrictions (i.e., prohibition, leash control, ROLA) or conditions of noncompliance are expected to essentially eliminate turbidity impacts because dogs would be kept out of the park's water bodies.

[Don't speculate about the effects of dogs on turbidity at Muir Beach. Where is your supporting data? You have none. You have no data showing that dogs have created a turbidity problem at Muir Beach that affected sight-feeding fish, smothered eggs, killed mussels, etc.]

Nutrients Dog waste contains nitrogen and phosphorus, which are nutrients required by algae for growth. Excessive nutrients in water resources, especially ponds or lagoons with low flushing rates, can lead to excessive algae growth, known as an algal bloom. Algal blooms can be unsightly, and the eventual die-off of the algae can cause dissolved oxygen levels in the water body to drop below water quality standards, which can cause fish kills (MDNR n.d., 1). Where dogs are present near water bodies and the waste is not routinely removed by the dog owners, impacts on water quality may occur due to nutrients in dog waste in addition to multiple other sources of

nutrients contained in stormwater runoff.

[You have no data showing this is a problem at Muir Beach. Where is your data comparing Muir Beach to a similar beach where dogs are prohibited? Where is your data showing algae blooms are a problem at Muir Beach or that dogs are a proximate cause? These problems do not exist at Muir Beach so you do not need to ban dogs to correct these problems.]

Pathogens Pet waste contains a large number of bacteria and may contain Giardia, roundworms, Salmonella, parvovirus, and many other microorganisms called pathogens that can be harmful to human health. If pet waste is left on the ground, runoff from rain events may transport these microorganisms to adjacent water bodies. Defecation from dogs can also occur directly in a water resource, such as a creek, stream, or pond. Fecal coliform bacteria are routinely measured across the nation at bathing beaches as an indicator of potential contamination from human or animal waste. The primary impact of dog waste on water quality relates to its potential impact on human health ?.

A substudy of the San Francisco Sewage Master Plan determined that bacterial contamination of waters off Ocean Beach was significant due to dog waste deposited along the shoreline. Dogs Chapter 4: Environmental Consequences have been observed by park staff in the lagoon and ocean at Muir Beach, Redwood Creek ?. The presence of dogs in the water at each of these sites has the potential to impact the turbidity and increase the nutrient load and fecal coliform levels in the water.

[Heal the Bay's Summer Beach Report Card 2010 gives North, Central and South Muir Beaches an A+ for water quality for both dry and wet times of the year. You have no data showing that there is a problem with dog pathogens in the water or any pathogens, for that matter.]

[You have no data showing bacterial contamination of waters off Muir Beach even though Heal the Bay issues a report card every year. Instead, you cite studies showing problems at other beaches and write that the presence of dogs has the "potential" to pollute the water. But the data shows that dogs at Muir Beach do not pollute the water ? there is no health concern. There is no problem with algal blooms.]

Water Quality Impacts Alternative A: No Action. The tidal lagoon and Redwood Creek are currently closed to dogs, but there is no physical barrier to prevent dogs from accessing Redwood Creek, and fencing at the lagoon is ineffective against noncompliant dogs. Visitor use is moderate to high at this site and it has been observed that dogs frequently access Redwood Creek. One warning, one citation, and one report were taken for dogs in areas closed to pets in 2007/2008. [In 2007-2008, there was a total of three reports

of dogs in Redwood Creek.!! This does not support the finding that dogs "frequently access" Redwood Creek. This supports a finding that dogs rarely access Redwood Creek. More importantly, you have no data showing this level of dog activity causes any damage.] The voice-control area of Muir Beach encompasses the entrance channel of Redwood Creek and is located immediately adjacent to the shoreline of the lagoon, which has recently been restored. Additionally, the community of Muir Beach is located adjacent to the NPS beach, which adds to the moderate to high visitation at the site. Park staff members have observed that some local residents let their dogs run freely on the beach and do not dispose of dog waste properly. [This has been going on since the 1800's] Dogs may cause turbidity by running in the lagoon and Redwood Creek and stirring up sediment. There would also be continued potential for nutrients and pathogens from dog waste to enter the lagoon, creek, or adjacent ocean. [But you have no data showing either that this actually occurs or that the volume of contaminants is significant. Also, we are not talking about banning dogs from Redwood Creek; we are talking about the ocean, and to a lesser extent, the tiny lagoon at Muir Beach] However, pollutants are dispersed in high energy beach environment. Water quality impacts from alternative A would therefore be considered long term and adverse, [You have no data supporting this conclusion.] but minor because of other contributing factors such as stormwater runoff. The effects on water quality as a result of dogs would be detectable but would not be large enough to cause substantial local changes to water quality.[Consequently, consideration of water quality impacts should have lead to a finding in favor of Alternative A!]

The long-term minor adverse impacts on water quality from dogs at Muir Beach under alternative A were considered together with the effects of the projects mentioned above. The beneficial effects from the trail rehabilitation and restoration projects should reduce some of the adverse impacts on water quality from alternative A resulting in negligible cumulative impact on water quality. [In other words, there is no problem now and the chance there will be future problems will only grow smaller if the status quo is maintained!]

Coastal Community Habitats Coastal dune plant species are very sensitive and easily disturbed by trampling, digging, and other activities, and may not recover due to their sensitive nature or may create opportunities for the establishment of non-native and/or invasive plant species.

Alternative A: No Action. At Muir Beach, dune communities, including a dune restoration area, are located adjacent to the beach, which is open to dogs under voice control. This site has high visitor use and there were three recorded incidents of dogs in a closed area in 2007/2008 at this site. [Three incidents in all of 2007/2008? How many incidents of people being present in the dune area? You have no data showing this level of dog activity causes

permanent data. You have no data comparing the effects of dogs after 150 plus years on dune communities at Muir Beach to similar beaches where dogs are prohibited.] The dune communities at Muir Beach are not well protected, and rocky intertidal habitat also exists at Muir Beach but is unlikely to be affected by dogs. Ineffective post-and-cable fencing at Muir Beach discourages visitors from entering the dune restoration area; other dune areas are unfenced and would not physically exclude dogs. [More people than dogs enter these areas. If you want to keep most dogs out, just build better fences with gates. The presence of a couple dogs a week has not been shown to cause any permanent damage.] As a result, alternative A would have continued long-term moderate adverse impacts on coastal dune plant species because the integrity of the plant community could be negatively affected by dogs through trampling, digging, and dog waste. ["Could be"? The status quo has been dogs running free for more than 150 years. What does the real data show? There is no evidence of damage to the integrity of the plant community relative to similar beaches where dogs are prohibited.]

The beneficial effects from the many habitat restoration projects at and near Muir Beach should reduce some of the adverse impacts from this alternative on the coastal dune plant community. [There is no problem now and the likelihood of a future problem occurring will decrease because of plant restoration projects near Muir Beach. So why change the status quo?] Therefore, cumulative impacts on the coastal dune plant community under this alternative would be expected to be negligible to long term, minor, and adverse.

MUIR BEACH ALTERNATIVE A CONCLUSION TABLE The Plan Coastal Community Long-term moderate adverse impacts. Negligible to long-term minor adverse cumulative impacts.

[This conclusion is not even supported by your own findings. The correct conclusion is that a non-existent problem will be even less likely to exist in the future if we adopt Alternative A.]

WETLANDS AND AQUATIC HABITATS Muir Beach (Lagoon)
Alternative A: No Action. The lagoon located at Muir Beach is described as a small tidal lagoon fringed by wetland vegetation. A wetland restoration project was completed at this site in 2009, which included increasing its size and depth, adding woody debris and revegetating the shoreline; invasive vegetation was also removed as part of the restoration project; Phase I of this project reconnected the creek to the flood plain and expanded the tidal lagoon. Under current conditions, dog walking is allowed on leash or under voice control at the site. The park has closed the lagoon and Redwood Creek to dogs, although there is no physical barrier to prevent dogs from accessing the lagoon or Redwood Creek and it has been observed that these closures

have been violated. The area is considered a moderate to high use site, and dogs do gain access to the lagoon and surrounding wetland habitat.

[More people, especially children, than dogs play in the lagoon. There is no evidence they have done damage. You don't have to keep every single dog out of the lagoon every day. In any event, if it is a problem, construct a better fence.]

Alternative A: No Action. The long-term minor adverse impacts on riparian vegetation from dogs at Muir Beach under alternative A were considered together with the effects of the projects mentioned above. The beneficial effects from the rehabilitation and improvement projects should reduce some of the adverse impacts on riparian vegetation from alternative A. Therefore, cumulative impacts on riparian vegetation under this alternative would be expected to be negligible.

[There is no evidence that dogs have permanently damaged the riparian vegetation in the last 150 years and even the authors admit continuing to let dogs run free will have a negligible impact. Thus, protecting the riparian vegetation is no justification for restricting dogs.]

Riparian Forest and Stream Corridor Impacts Rationale The preferred alternative would allow on-leash dog walking in the parking area and on the Pacific Way Trail. The boardwalk/path to beach and the beach itself would be closed to dogs. The tidal lagoon and Redwood Creek is currently closed to dogs. Riparian forest vegetation located in the 6-foot area adjacent to the trail and parking lot would receive long-term minor adverse impacts from dogs trampling and digging in vegetated areas; nutrient addition from dog waste would also occur. The effects would be measurable and perceptible, but would be localized in a relatively small area. The long-term minor adverse impacts from dogs in the LOD area would occur in a relatively small area compared to the site as a whole. Physically restraining dogs on leash would protect vegetation off trail, and trails in riparian habitat constitute a small area in comparison to the entire site. Therefore, assuming compliance, the overall impacts on riparian vegetation from on-leash dog walking at Muir Beach would be negligible because impacts would result in no measurable or perceptible changes in the plant community.

[The intelligent conclusion would be to require dogs be on leash in the parking area and the trail to the beach, and not prohibit dogs from running on the sand and playing in the surf.]

Birds and Sea Mammals Although the site has documented low shorebird abundance and diversity compared to other GGNRA coastal beaches, dog presence at the site as well as dogs barking at, chasing after, and being in proximity to roosting or feeding birds would continue to result in

disturbance to shorebirds and waterbirds. This type of disturbance by dogs could result in loss of preferred habitat as well as energy loss to migrating and wintering birds, potentially reducing their chances of survival along their migratory routes and reducing fitness for successful reproduction. The presence of leashed and mostly unleashed dogs also results in flushing and displacement of shorebirds in response to presence of a perceived predator. [You have no evidence that the presence of dogs at Muir Beach is the cause of low shorebird abundance and diversity. Dogs have been there for 150 years. You have no evidence that continuing to allow dogs will further reduce the bird population.] Muir Beach also has a lagoon that supports shorebirds, wading birds, and waterbirds in addition to the limited numbers of shorebirds along the beach/ocean shoreline. A fence surrounds the lagoon but does not effectively keep dogs out of the area. The lagoon at Muir Beach was recently restored and may attract more shorebirds and waterbirds and increase visitor use of the site in the future, and the area could be subjected to repeated disturbance by unleashed dogs, including in closed or fenced areas. [Just build a better fence. Mill Valley has a dog park next the Bay shore. Dogs run free and birds frequent the tidal areas. You should not speculate; you should collect real data.] Additionally, marine mammals that haul out or strand at Muir Beach could occasionally be affected by dogs on the beach through dogs approaching, biting, barking at, or climbing on/surrounding the mammals or chasing after hauled-out mammals back into the water.

[What does the actual data show? How often has this happened in the last ten years? What has the affect been on the sea mammal population? Let me save you the trouble of doing the research ? there has been no impact.]

Construction Activities, Oil Spills, Vehicle and Boat Noise Development or construction actions at or in the vicinity of GGNRA sites have had or may have the potential to have adverse impacts on coastal communities, including shorebirds. Generally, adverse impacts on shorebirds may include temporary or permanent loss of habitat and physical disturbance by construction workers or from vehicle and/or boat noise during construction; levels of impacts may include avoidance, underuse, complete abandonment, or reduction in total numbers of shorebirds at construction areas in the coastal community. Oil spills affect birds, mammals, and fish. Marine mammals such as fur seals and sea otters are extremely affected by oil on the water, as are birds that float on the surface of the water (such as scoters and grebes).

[Dogs do not build structures, spill oil, and cause vehicle and boat noise that disturb birds and sea mammals. If those activities threaten birdlife and sea mammals at Muir Beach, banning dogs will not fix the problem.]

Water-dependent amphibians and reptiles Water-dependent amphibians and

reptiles found in Redwood Creek that may be affected by current conditions include Pacific tree frogs, California newts, and California giant salamanders. Under the no-action alternative, if dogs gain access to Redwood Creek they could affect amphibians/reptiles by fouling water with dog waste, trampling plants (habitat) along the water/wetland edges, and disturbing sediment and causing turbidity that can smother egg masses, or by injuring or causing direct mortality to egg masses or individual species in the creek. Other wildlife species, such as birds and small mammals, because of their mobility can usually avoid areas where dogs are present during peak activity or habituate to these activities, but loss of preferred habitat would still indirectly affect wildlife. Off-leash dogs could also chase wildlife, and nesting birds on the ground or in low vegetation could have nests destroyed by dogs wandering off the trail. Therefore, alternative A would result in continued long-term minor adverse impacts on wildlife species at Redwood Creek.

[But there is no evidence that this is a problem at Muir Beach. Dogs run free at Muir Beach; Redwood Creek has amphibians and reptiles. There is no problem. If there is a problem, then ban dogs from Redwood Creek, not the beach.]

Coho Salmon There is no physical barrier to prevent dogs from accessing portions of Redwood Creek that support coho salmon. Coho salmon use Redwood Creek throughout their life cycle, from migrating and laying eggs as adults to living in the stream as juveniles. Salmonids in general are sensitive to water quality issues. Because coho salmon complete sensitive portions of their life cycle in Redwood Creek, adult and juvenile life history stages could be affected by dogs that gain access to the creek. Eggs would not be affected, because salmonids require gravel areas of substrate for laying eggs; these areas are located farther upstream from the area where dogs can access Redwood Creek. Dogs along the shoreline of Redwood Creek could alter the normal behavior of coho salmon directly if they frequently access the creek or its shoreline, or indirectly by causing increased turbidity by trampling shoreline areas and re-suspending sediment so that feeding is impaired. Potential impacts would be localized to the small area where dogs can access Redwood Creek.

[There is no documentation that dogs have either directly or indirectly affected the coho salmon in Redwood Creek. If Alaskan brown bears do not deter salmon swimming upstream to spawn, one or two golden retrievers in the lagoon won't deter the salmon who do not spawn in the lagoon]

STEELHEAD TROUT [There is no documentation that dogs have either directly or indirectly affected the steelhead trout in Redwood Creek.]

CALIFORNIA RED-LEGGED FROG In the study area, this species occurs

in Marin County at Muir Beach (water bodies at the site provide habitat but no known breeding occurs) ? Although there is currently no documented California red-legged frog breeding at Muir Beach and no previous documentation of frogs in other water bodies at the site(, juvenile frogs were recently found moving from an upstream breeding pond (near Green Gulch) that is located away from the Muir Beach site down the creek corridor towards Muir Beach. As future habitat improves for the frogs and the construction of breeding ponds is finished, breeding may occur in the future at Muir Beach. Currently, frog life stages that could be affected at the site by dogs include juveniles and adults, since juveniles have recently been found at the site. Even though frog breeding habitat occurs off- site from Muir Beach, near Green Gulch, noncompliant dogs under voice control could gain access to this area and affect frog eggs. Eggs could be affected by trampling from off leash dogs, as has been documented at a pond in Pacifica, California by the City of San Francisco in San Mateo County. However, there is no published documentation that dogs have either directly or indirectly affected the frog at this location.

[Therefore, concerns regarding the red-legged frog do not justify ending the age-old practice of letting dogs swim in the surf and run on Muir Beach.]

Archeological Resources [If the presence of dogs has not destroyed or damaged any "archeological resources" at Muir Beach in the last 150 years, the desire to protect archeological resources does not justify restricting dogs at Muir Beach.]

Visitor Use and Experience Alternative A: No Action. Overall, the number of leash law violations is low for this site, with only three occurring in 2007/2008; no dog bites or attacks were reported during this period (table 9).[Dog bites or dog attacks are not a problem at Muir Beach!] Under the no-action alternative, there would be no impact on the visitor experience of visitors who would prefer to walk dogs at the park. Dog walkers would continue to allow their dogs off leash throughout the site. Visitors would continue to enjoy exercising, socializing, and playing with the dogs on the beach. Having dogs off leash and playing throughout the area may add to the park experience for visitors with dogs. Residents adjacent to the beach would continue to allow their dogs to roam freely off leash without supervision. No change in visitation by this user group at Muir Beach would be expected. Impacts on visitors who would prefer to visit the park without dogs would be long term, moderate, and adverse.

[The people of Marin Country decided long ago to designate Muir Beach as the one beach where dogs can play in the surf and run on the sand. There is no other beach nearby that can serve this role. Residents of Muir Beach and Mill Valley can get to Muir Beach in less than 10 minutes. It is easy to take

dogs there after work. Beaches on the Marin Headlands are too far away.]

Park Operations [Because the status quo is letting dogs play in the surf and run on the beach, there would not be added cost to park operations by Alternative A.]

Conclusion The NPS has an ongoing fight with dog owners in San Francisco. Please do not drag the people of southern Marin County in this dispute. Let us have our one beach where dogs can swim in the surf and run on the sand. If they have not caused irreparable damage in the last 150 years, there is no reason to change the status quo. Marin Beach is all we have for dogs. The Bay is too polluted and the area near the shore contains broken glass and other dangerous objects.

Correspondence ID: 3153 **Project:** 11759 **Document:** 38106

Received: May,23,2011 18:23:40

Correspondence Type: Web Form

Correspondence: I am writing to you on behalf of Guide Dog Users, Inc. (GDUI) an international organization dedicated to advocacy, peer support, public education and all aspects of training, working and living with dogs specially-trained to guide blind and visually-impaired people. GDUI does not train or place guide dogs; but acts as an independent resource network; providing information; support and advice concerning guide dogs; guide; dog training and access laws to its members; the media and the public at large.

GDUI urges you to support the adoption of regulations which would create physically enclosed spaces as off-leash dog play areas for the safety of guide dog handlers and their dogs.

In a 2003 GDUI survey, 89% of guide dog handlers reported incidents of interference from unleashed dogs, placing these visually impaired individuals in serious danger. Even when an interfering pet dog simply wants to play, the team's attention to important elements of safe travel is distracted making the blind person vulnerable to the dangers of traffic and other environmental challenges. 42% of respondents have been the victims of attacks by unleashed dogs causing physical and psychological injury to both members of the team and even death or premature retirement of the guide dog which can cost more than \$50,000 to replace.

GDUI supports the enforcement of leash laws in general because such laws provide important safeguards for people, our pets, wildlife, and parks. Enforcement of the National Park System's leash law and the creation of off leash play areas for dogs would insure dogs have reasonable access to the

Park without jeopardizing the safety of disabled individuals partnered with specially trained assistance dogs, pet dogs, wildlife, or park visitors.

Guide dogs are bred to be gentle and unlikely to defend themselves, and as such are particularly vulnerable to attack. Therefore, GDUI urges creation of off leash play areas for pet dogs at the Golden Gate National Recreation Area.

Correspondence ID: 3154 **Project:** 11759 **Document:** 38106

Received: May,23,2011 19:17:21

Correspondence Type: Web Form

Correspondence: I am strongly against the proposed plan to severely limit the number of parks where dogs can roam free. Generally, San Franciscans are responsible dog owners and are very respectful of the parks. Dog parks are already completely packed and this will cause even more issues with space. I am one voter who will never support this plan.

Sincerely, Jenny

Correspondence ID: 3155 **Project:** 11759 **Document:** 38106

Received: May,23,2011 20:08:36

Correspondence Type: Web Form

Correspondence: I have lived in San Francisco for fifteen years and have a family including a young child and a three-year-old puppy. We especially love hiking as a family with our dog on Montara Mountain (where we usually only run into a few other people or dogs), as well as Ft. Funston, Crissy Field, Ocean Beach and Muir Beach. We enjoy seeing people of all ages, races, family units, and their well-socialized dogs out at these beautiful places. I believe that part of the wonderful charm of San Francisco is the openness and tolerance of the people, which is reflected in how beautifully the dogs play when out in these open park spaces. In over a decade of using these spaces heavily-with and without a dog-I have not encountered any dog fights in any of them. (The only violence at all that I can think of is hearing on the news that someone was stabbed in the Ft. Funston parking lot, by another person, of course, who was not a dog owner.)

This plan, if implemented, will make the Bay Area less healthy and more dangerous for both people and dogs. Everyone who works with dogs is well familiar with the fact that a dog who is allowed to run and play in open spaces and play and socialize with other dogs is less neurotic and much better behaved than dogs who are left at home or tied up in the yard--those dogs are the ones who become aggressive and hard to control. An excellent

example of this is the great behavior of all the dogs who showed up at the protest march on Mar. 21.

Please keep the Bay Area safe and healthy for everyone, and resist these blanket changes that would sabotage something that should be a model for the rest of the state, if not the country.

Thank you for your time.

Correspondence ID: 3156 **Project:** 11759 **Document:** 38106

Received: May,23,2011 20:13:22

Correspondence Type: Web Form

Correspondence: I have lived in San Francisco for fifteen years and have a wife, young daughter, and a three-year-old puppy. We especially love hiking as a family with our dog on Montara Mountain (where we usually only run into a few other people or dogs), as well as Ft. Funston, Crissy Field, Ocean Beach and Muir Beach. We enjoy seeing people of all ages, races, family units, and their well-socialized dogs out at these beautiful places. I believe that part of the wonderful charm of San Francisco is the openness and tolerance of the people, which is reflected in how beautifully the dogs play when out in these open park spaces. In over a decade of using these spaces heavily-with and without a dog-I have not encountered any dog fights in any of them. (The only violence at all that I can think of is hearing on the news that someone was stabbed in the Ft. Funston parking lot, by another person, of course, who was not a dog owner.)

This plan, if implemented, will make the Bay Area less healthy and more dangerous for both people and dogs. Everyone who works with dogs is well familiar with the fact that a dog who is allowed to run and play in open spaces and play and socialize with other dogs is less neurotic and much better behaved than dogs who are left at home or tied up in the yard--those dogs are the ones who become aggressive and hard to control. An excellent example of this is the great behavior of all the dogs who showed up at the protest march on Mar. 21.

Please keep the Bay Area safe and healthy for everyone, and resist these blanket changes that would sabotage something that should be a model for the rest of the state, if not the country.

Thank you for your time.

Correspondence ID: 3157 **Project:** 11759 **Document:** 38106

Received: May,23,2011 20:24:10

Correspondence Web Form

Type:

Correspondence: Hello, thank you holding very informative public meetings and for this opportunity to comment.

I'll limit my comments to a few specific areas within the GGNRA that I frequent with my wife and our dog.

At Ocean Beach, please mark Stairway 21 more clearly. We have no idea at all where it's located.

At Mori Point, for security reasons, please continue to allow access on the Pollywag Path. There have been several cars broken into while parked near the Moose Lodge entrance. And for a mere scenic reason, please keep the Lishima trail open in order to accommodate a return loop trail.

And in general, please consider the impact of the proposed limitations on nearby city and state parks.

Best, Michael Wright

Correspondence 3158 **Project:** 11759 **Document:** 38106

ID:

Received: May,23,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: I live in Mill Valley and I have two young daughters who petitioned me for years to get a dog. Last year we got one, a mini Australian Labradoodle we named Beans. Thus I was introduced to the world of dog owners. My dog loves to go for walks, like all dogs. I thought this would be great -- I need the exercise; he needs the exercise. We live in Marin County, surrounded by parks and open space. I was excited about exploring all of these beautiful places as I grew old with my dog. But no! I was surprised to find out that there are very few places where I can take my dog. I can walk him around the neighborhood, but he's an animal. He (and I) yearn for open spaces. What is the point of having parks if people can't use them?

Now I find that further restrictions are in the works. I can look out my window and see beautiful hills all around me, but I can't take my dog to go roam them. I ride my mountain bike up these trails and roads and never see anyone. WHAT is the big deal about opening these places to dogs?

It's ridiculous. I go to the Mill Valley Dog Park (where neither my dog nor I get any exercise) and I am totally impressed by how well-behaved the dogs are. This "Dog Management Plan" isn't about managing dogs. It's discrimination against people who own dogs. I pay my taxes, just like

everyone else. Why are my rights being restricted. It's outrageous!

Rick Borden Mill Valley, California

Correspondence ID: 3159 **Project:** 11759 **Document:** 38106
Received: May,23,2011 21:10:29
Correspondence Type: Web Form
Correspondence: I support Plan D, the most protective of the wild life and natural resources.

Correspondence ID: 3160 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs. Please keep our open spaces dog-friendly and plentiful. The Park Service should revise the dog management plan to: 7 Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas 7 Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation.

My husband and I love to get to Fort Funston at least twice a month to take our beloved weimaraner for a long hike through the trails and along the beach. We look forward to being outdoors with our dog and it makes us so happy to watch her play and run - she is so happy! It would be a shame if we suddenly had no where to take our dog to experience the outdoors.

Best, Serena Earwicker Mountain View, CA

Correspondence ID: 3161 **Project:** 11759 **Document:** 38106
Received: May,23,2011 22:52:23
Correspondence Type: Web Form
Correspondence: May 23, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- * Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.
- * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- * Exclude speculative, exaggerated, biased, or misleading statements and studies.
- * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- * Align commercial dog walking rules with county or city regulations.

These are my personal comments and observations regarding this plan:

My dachshunds enjoy running, fetching, and even swimming. They are well-behaved under voice control or on leash. Our favorite areas to play are Fort Funston, Great Highway, and Crissy Field. They also enjoy trail hiking with me on the Peninsula and Marin County, and along the coastside hills in Pacifica. It would be a shame to have to leave my beloved animals home if they are restricted from enjoying their favorite recreation areas. It is important for dogs (especially dachshunds) to be active and get enough

exercise.

I appreciate your consideration.

Sincerely,

Janet Lusano San Francisco, CA 94132

Correspondence ID: 3162 **Project:** 11759 **Document:** 38106

Received: May,23,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. I am a mother of four "kids"...two human and two dogs. I use fort funston everyday to run all four of my kids and this plan is not factual; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: - Honor the original 1979 Pet Policy. - Respect dog-walking as legitimate recreation. - Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. - Exclude speculative, exaggerated, biased, or misleading statements and studies. - Provide reasonable ways to address any significant adverse impacts from recreational activities. - Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). - Align commercial dog walking rules with county or city regulations. Please do not take this away from my family.

Correspondence ID: 3163 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan.

I use a number of the proposed area with my 2 dogs - i use Muir Woods Beach, Oakwood trail, and my favourite is Crissy field and fort funsten. One of the unique and special things about San francisco has always been a open minded approach to diversity and differences of opinion. the world is becoming more and more dog-friendly - look around there are so many dog friendly hotels now and websites dedicated to travelling with your canine companion. San Francisco has been considered for a number of years as one of the most dog friendly places in the world. to some the dogparks--fenced in areas are enough - for dog lovers though we truly recognise the joy in our dogs as we watch them run and splash in the waves and water of our local beaches.

These dogs are like our kids and family members - just like with kids - you have badly behaved kids and parents who don't seem to control these badly behaved kids - there is a similar problem with a small minority of dog owners-- the overall majority of dog-owners and dog-walkers are extremely responsible and we above all realise there is a lot more at stake for us than there is for parents. I doubt there will ever even be considered a law that bans kids from the beach -

One of the reasons I've heard mentioned on this whole dogs off beaches--is to do with the very few owners who don't pick up after their dogs--this is not a mojority or even a viable number - it is rare that i come across another dog's poop --and when I do--I pick it up....

I can't tell you how many times after a sunny day at crissy field the number of plastic shovels, floating sandwich bags, burst beach balls, articles of clothing--all left behind littering the beach and environmentally effecting the leaving an unfriendly environmental effect behind -- it's easy to point fingers and say dogs and their owners--but truly - dogs are a part of the San francisco culture --

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not

provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

please - -please reconsider this proposal - Sincerely,

Bonny Dunn sausalito ca 94965

If you can start the day without caffeine,

If you can get going without pep pills,

If you can always be cheerful, ignoring aches and pains,

If you can resist complaining and boring people with your troubles,

If you can eat the same food everyday and be grateful for it,

If you can understand when your loved ones are too busy to give you any time,

If you can overlook it when those you love take it out on

you when, through no fault of yours, something goes wrong,

If you can take criticism and blame without resentment,

If you can ignore a friend's limited education and never correct him,

If you can resist treating a rich friend better than a poor friend,

If you can face the world without lies and deceit,

If you can conquer tension without medical help,
If you can relax without liquor,
If you can sleep without the aid of drugs,
If you can say honestly that deep in your heart you have no
prejudice against creed, color, religion or politics,
Then, my friend, you are almost as good as your dog!

"Author Unknown"

Correspondence ID: 3164 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 24, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city

regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: it is the rule, rather than the exception, that dog owners are respectful and that dogs are well-managed by their owners. I've experienced this at both Crissy Field and Fort Funston. Clear signage is respected. I am grateful to enjoy exercise and beauty while with my companion dog. Please acknowledge that dogs play a significant role in urban life for many, many people.

Sincerely,

Rhonda Spencer

Correspondence ID: 3165 **Project:** 11759 **Document:** 38106

Received: May,24,2011 06:58:48

Correspondence Type: Web Form

Correspondence: I already submitted a comment however I do have one more question and opinion. As long as I can remember, GGNRA has not allowed any type of commercial business on the property at Fort Funston. There was someone who wanted to set up a coffee/snack truck and was told that it was not allowed-no commercial businesses on GGNRA property. Why then do you allow professional dog walkers to conduct their business at Fort Funston? These people do NOT pay taxes on a large part of their income (as most goes unclaimed due to cash payments). Most of them are not licensed businesses. They walk too many dogs simultaneously. Many dog parks in the south bay limit the number of dogs one person can bring to the park to three(3). Three is the number of dogs a household may have without a kennel license. A couple of dogs running down a hillside do not cause much disruption to the environment. A person with a pack of 10 to 15 dogs does. Instead of limiting off-leash access to dog owners, limit the number of dogs any one person may bring at a time.

Correspondence ID: 3166 **Project:** 11759 **Document:** 38106

Received: May,24,2011 07:57:40

Correspondence Type: Web Form

Correspondence: May 24, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Align commercial dog walking rules with county or city regulations.

In addition, the plan to permit dog walkers to six dogs is ridiculous. I've been a professional dog walker for over five years and I don't know anyone that can't control six dogs on leash. The limit, if any, should be eight. This way you are not capping our income and you are not forcing us to increase our prices beyond the means of most of our clients. Require people to get a business license with the city, be insured with any of the major pet insurance companies and hold a permit. This will help get rid of some of the walkers who don't take this job seriously. And to be honest, it's more of the individual owners that are the ones causing problems: not leashing their

dogs, leaving feces on the trails, etc. I've heard this from multiple Park Police officers. This is an issue that has been going on for 10 years with no resolution. Stop spending so much time and money on an issue that can never be resolved. Find a reasonable compromise and lay this to rest!!!

Sincerely,

Jessica Chase San Francisco, CA 94129

Correspondence ID: 3167 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/24/2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The

Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Align commercial dog walking rules with county or city regulations. These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Sky Kral SF, CA 94110

Correspondence ID: 3168 **Project:** 11759 **Document:** 38106
Received: May,24,2011 09:45:08
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3169 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/24/11

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and

misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Align commercial dog walking rules with county or city regulations and enforce current off-leash guidelines. These are my personal comments and observations regarding this plan (which I did not get to send with last comments.) I mostly walk my dogs at Fort Funston for the last 20 years. In all this time I have never seen any dogs disrupting snowy plover nests. I have seen NPS vehicles on the beach disrupting the sand and anything in their paths. Do not blame the dogs for this please as they do not contribute substantially to nest damages.

Sincerely,

Sky Kral San Francisco, CA 94110

Correspondence ID: 3170 **Project:** 11759 **Document:** 38106
Received: May,24,2011 09:50:33
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all

action alternatives" that further reduce or ban dogs in open spaces.

Correspondence ID: 3171 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Web Form
Correspondence: This is a great off leash dog park. Please keep it that way. There is no substitute available.

Correspondence ID: 3172 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 24, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Mr. Dean, Below are all the standard arguments against the Off-Leash proposal. On a more personal note, for young and old these are trying times we are living in. That's all folks need is more regulation and freedom of movement taken away from them and their pets. A walk on the beach with your dog running free and happy is a nice get away from today pressures. The Beach's are our backyard, a place to get away from it all. On with the standard arguments that oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog

walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.
Sincerely, Edward Gast, San Francisco, CA. 94121

Correspondence ID: 3173 **Project:** 11759 **Document:** 38106
Received: May,24,2011 12:20:24
Correspondence Type: Web Form
Correspondence: While not a resident of San Francisco, California, one of my daughters lives there, and I visit her frequently. I take my dog with me on these visits. My daughter and I like to walk our dogs along the beach and in Golden Gate Park. Most dog owners are responsible and respect areas which are signed to avoid because of new planting etc. We never fail to pick up after our dogs. Understandably there are areas where dogs must be on leash, but other than that I feel they should be allowed off leash in open spaces if the owner is confident that his dog will not be a hazard to other dogs or persons. The bottom line is: we need more dog areas, not less.

Correspondence ID: 3174 **Project:** 11759 **Document:** 38106
Received: May,24,2011 13:10:03
Correspondence Type: Web Form
Correspondence: I support Alternative D for Muir Beach which minimizes the presence of dogs.

There are three types of dog walkers. "Responsible Walkers" follow posted dog rules and respect the environment and other user's health. They use leashes, dog litter bags, and carry out dog feces. "Dog Cheaters" will disobey rules when one is watching. Their abandoned plastic dog litter bags can be seen littering public land throughout Marin. "Dog Jerks" flagrantly ignore dog rules. They take their dogs on clearly prohibited trails and areas like fenced soccer fields. They watch while their dogs chase wildfowl in estuaries in Pickleweed Inlet and Richardson Bay.

There is inadequate enforcement in Marin to manage bad dog owners/walkers. Observe the environmental damage and lack of leash enforcement near Mill Valley Bayfront Park and Dog Area. Observe dog feces in the sand in children's play areas. A birthday party or social gathering for kids in many city parks results in dog feces on shoes and play balls. There is even less enforcement in the GGNRA.

Where ever dogs are allowed there will be environmental impacts and health risks to kids. The less access for dogs the better. Thank you for considering

my comment.

Correspondence ID: 3175 **Project:** 11759 **Document:** 38106
Received: May,24,2011 14:31:39
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean and Park Commissioners, As a Bay Area resident, I am very concerned about the proposed changes in the GGNRA dog policy, which would eliminate entirely or severely curb canine access, and therefore access for people with dogs, to federal lands. I believe that this is particularly discriminatory to women, who may rely on a canine companion to safely walk or hike alone.

I urge you to keep the current GGNRA policy (the 1979 Pet Policy) and add balanced voice-control areas in San Mateo County and in new lands, such as the reserve in Montara. I also encourage you to establish rules allowing for professional dog walking for the many of us who have long workdays and commutes. Rather than banning dogs on the proposed blanket scale, each site in the GGNRA should be studied and, if there is a concern about canine impact on a particular endangered species, then simpler mitigations (signage, barriers) should be considered and implemented first.

Of course, there are a few irresponsible dog owners who don't pick up after their dos, but there are also irresponsible mountain bikers and hikers who leave other types of litter. This is not a good reason to keep all dogs and their owners out of public lands after 40 years of healthy dog recreation.

Healthy dog recreation is vital to the well-being of urban individuals and communities and should be fostered, not restricted.

Sincerely, Judith Pierce Rosenberg Montara, CA

Correspondence ID: 3176 **Project:** 11759 **Document:** 38106
Received: May,24,2011 16:14:53
Correspondence Type: Web Form
Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

Correspondence ID: 3177 **Project:** 11759 **Document:** 38106
Received: May,24,2011 16:21:02
Correspondence Type: Web Form

Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

Correspondence ID: 3178 **Project:** 11759 **Document:** 38106

Received: May,24,2011 16:26:41

Correspondence Type: Web Form

Correspondence: I understand that you feel the need to protect these areas for the general public, but dog owners are part of the general public . We pay taxes and care about Fort Funston. We use it more than any other group. You need to be a little more generous with the amount of leash free area you are providing for us. Thank you for your time.

Correspondence ID: 3179 **Project:** 11759 **Document:** 38106

Received: May,24,2011 16:30:14

Correspondence Type: Web Form

Correspondence: I think that this plan to close so much of the GGNRA to off-leash dogs and their human companions is basically a huge, complicated solution to not much of (if any) a problem.

As a weekend visitor to Crissy Field and Fort Funston, I am there at peak times and I have never witnessed any sort of problem with dogs attacking or hurting people. On the contrary, the dogs I see are in heaven: getting exercise, socializing with other dogs and having a marvelous time. Also, their owners are talking with other dog owners, making pleasant conversation, relaxing and getting exercise. There is so little total acreage that is accessible to humans with their off-leash dogs in the park as it is.

Off-leash exercise is a must for many dog breeds. They simply must have off-leash exercise. My husband jogs with our Brittany regularly, but he can't possible run fast enough or long enough to exhaust our dog. Dogs who do not get regular, quality exercise are more aggressive and just plain cranky. They also bark more --a real nuisance in crowded urban areas like the Bay Area.

I think this plan will overload the off-leash areas in San Francisco and Oakland.

I think this plan with its draconian restrictions will only serve to encourage scofflaws and add to the resentment. I think that it will result in a lot of confrontation and ill will. I would not want to be a park ranger trying to enforce this!

Correspondence ID: 3180 **Project:** 11759 **Document:** 38106

Received: May,24,2011 17:30:50

Correspondence Type: Web Form

Correspondence: I support Alternative C - Multiple Use. I have owned a dog in the Bay Area for 10 years, and I have been a GGNPA volunteer (Golden Gate Raptor Observatory) for 2 years. I am also a conservation biologist and an advocate for wildlife and wild places. I believe in the GGNRA first and foremost as a place for native species to thrive. Migrating birds in particular face many challenges to survival. It is critical that they have places to rest, feed, and breed as they make long migrations. However, I also know that dogs make good citizens when they are well-exercised and socialized, and that generally means time off leashing playing with other dogs and people. For these reasons, I support Alternative C - Multiple Use. I am also fully supportive of the park utilizing a Compliance-based Management Strategy in which non-compliance by dog owners results in a forfeiture of rights. I love dogs, but native wildlife and the health of the ecosystems in our last wild places must come first. There are no alternatives for native species and ecosystems and cultural resources are not easily returned once lost. Dogs can be walked in neighborhoods, dog parks, regional parks and city parks.

Correspondence ID: 3181 **Project:** 11759 **Document:** 38106

Received: May,24,2011 18:41:34

Correspondence Type: Web Form

Correspondence: Thank you for taking comments. I strongly feel that dogs should be allowed (as it already exists) in areas of GGNRA. I have lived in California for over 20 years and I have had more incidents with people and people on bikes than I ever had with dogs and their owners. I know that most dog owners are responsible. Dogs need to have freedom to run and play and dog parks are not the solution. Dogs parks are not a natural way for people and dogs to interact in a pen. I firmly feel that providing off leash areas and leash areas allow dogs to be more happy and a happy dog is definitely a less aggressive and more socialized dog.

I really hope that you do not change the current rules and allow the areas in GGNRA to allow dogs.

Thank you for your time and consideration.

Sincerely,

D. Regina

Correspondence ID: 3182 **Project:** 11759 **Document:** 38106

Received: May,24,2011 19:09:38

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

Correspondence ID: 3183 **Project:** 11759 **Document:** 38106

Received: May,24,2011 19:12:29

Correspondence Type: Web Form

Correspondence: Dogs need to run! There are very few places left that allow off leash exercise. For people such as myself, who are too old to run with their animals, the beach is the best environment for this activity. I am fortunate to have the ability to take my dogs to the private stretch of Stenson Beach once a week for some much appreciated ball chasing in the ocean. Most of the people I have encountered while participating in this activity genuinely enjoy watching my dogs play in the surf. I have a leash with me at all times and clean up after my dogs. The beach is actually one of the few places where people are pretty consistent about cleaning up after their dogs and keeping their dogs under control. I am personally a little tired of the attitude that all dogs must be leashed because a few may cause a problem. By all means, if someone is allowing their animal to behave inappropriately ticket them. Allow the remainder (the majority) to enjoy the beach environment with their dogs off leash. It's basically one of the last frontiers of off leash activity. What better place to enjoy that activity but in our National Park System. Sincerely, Martha Cherry

Correspondence ID: 3184 **Project:** 11759 **Document:** 38106

Received: May,24,2011 21:28:12

Correspondence Type: Web Form

Correspondence: May 24, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of

people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. In addition, it has not taken into account the impact off-leash restrictions in the GGNRA would have on city parks. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I would like to add a few comments on a more personal note:

I am a 23-year resident of San Francisco. I live in a small one-bedroom apartment in the city. I probably would not have adopted a dog if I did not have the option to take him to the beach regularly for a good off-leash romp and swim. My beloved black Labrador Retriever, Otis, is over 12 years old and in excellent health-trim, fit, alert, well-behaved and happy. He has some arthritis as a natural consequence of aging, so I make sure that he continues to get regular exercise. My vet and I both attribute his remarkable good health to the fact that he visits Fort Funston 3 times a week with Pawsitive Tails dogwalkers, a very professional organization, while I am at work. On weekends whenever possible I take him to either Funston or Crissy Field. Those outings give us both joy, keep us fit, and provide a quality of life for BOTH of us that cannot be replicated in a fenced-in dog run, or even in a city park.

I was a frequent Fort Funston/Crissy Field visitor long before I had a dog to

bring along, and in 23 years never ONCE have I witnessed a negative encounter between dogs and people in either place. I have been to both areas countless times, and even on those rare perfect warm San Francisco days, the areas are never over-crowded! I cannot say the same for the City's dog parks and dog runs. There is simply not enough space in these areas to accommodate the number of dogs living in the city.

Less than 1% of GGNRA land is available under the current Pet Policy for off-leash recreation, which means there are plenty of places available for people who would prefer not to be around dogs.

You may not realize or appreciate what an asset you have in the dog community. We let other visitors know when they are venturing into areas where they should not be or in any way behaving (or letting their dogs) behave in a manner that threatens the area. If you keep the policy as is, trust me-we will be the best protectors of that precious resource, because we know how much it means to us and we do not want to lose it!

Please do not attempt to punish or exclude those of us who are responsible dog guardians, who clean the beaches regularly and pick up after others, who responsibly train our dogs to respond to voice control and to avoid "sensitive areas", and who simply want to enjoy outdoor recreation on these beaches with our best friends. Sincerely,

Sandra Shuhert San Francisco, CA 94114

Correspondence ID: 3185 **Project:** 11759 **Document:** 38106

Received: May,24,2011 21:34:51

Correspondence Type: Web Form

Correspondence: Animal rescue is part of San Francisco's spirit. Please continue this unique tradition of our city's by maintaining the meager 1% of open space for off-leash dog exercise that has allowed SF residents for many years to rescue and rehabilitate these amazingly adaptable and forgiving animals (that we, as humans, are responsible for domesticating)

San Francisco has always set the standard in this country on its fearlessness for taking a stand on social justice issues - one of which has always been its advocacy for animal welfare. SF's city animal shelters have far lower euthanasia rates than any other city country-wide and hundreds of privately run animal rescue groups. This is a standard that SF has set that we can be proud of, as a liberal and progressive city, and a model for other cities to follow. Much of this is due to people's access to 'multi-recreational' usage land that allows them to adopt dogs and properly exercise them, or have them properly exercised by dog walkers/trainers, which can often off-set a

dog's previous life of abuse or neglect. Dogs are amazingly adaptable creatures.

What the Proposed Plan doesn't take into consideration is that many 'rescue dogs' need to slowly acclimate to socialization with other dogs, and Option A (current plan) allows this by making good use of the 1% of GGNRA land (that will be taken away in the Proposed Plan) to exercise and socialize these special dogs. This land enables them to, with training and guidance by the hundreds of passionate dog professionals in the city, eventually and gradually become fantastic canine citizens of responsible SF residents who see potential in these neglected and forgotten animals.

The Proposed Plan, restricting a drastically reduced amount of land to off leash dog interaction, will compromise how dogs learn to live in a city. If there is no space to properly exercise dogs, these dogs will continue to exhibit behavior problems in the more densely populated areas available to them, pose risks and probable law suits, or simply not be adopted or be surrendered, and subsequently euthanized. We will become like every other city. This is a waste of perfectly fantastic dogs who basically just need a chance to learn the rules.

Correspondence ID: 3186 **Project:** 11759 **Document:** 38106

Received: May,24,2011 21:38:59

Correspondence Type: Web Form

Correspondence: I am a native San Franciscan. I currently reside in the Outer Sunset, a block away from Ocean Beach. I have been recreating on GGNRA land since the late 1970's. I grew up enjoying all of the places that have been the topic of recent discussion. GGNRA land has always been an integral part of my life. I now have a small dog walking business because of which, I frequent Fort Funston ten times per week. I think it is one of the most beautiful places on earth, I cherish this land and pick up litter daily to help in its preservation (an overwhelming amount of trash exists due to humans, not dogs) ?being able to enjoy this land greatly enhances my life and those of my canine companions. As a result, the lives of my human clients are enhanced as they are the proud owners of exceptionally well exercised, socialized and well behaved dogs. Dogs that are not adequately exercised can develop behavioral problems such as barking, destroying property in the home, etc. This obviously creates a ripple effect, extending into the neighborhoods and communities throughout our fine city. If the few existing off leash areas were further prohibited as proposed by the GGNRA, the result would be devastating for all. All of the parks in San Francisco that are not part of GGNRA land, will be overrun by dogs. The DEIS does not adequately address dispersion issues. The DEIS does not adequately address the environmental and social impact of forcing large numbers of people and

dogs into much smaller areas. Reducing the amount of area available for off-leash will significantly degrade the park experience for people with dogs. It will increase conflicts. Even more importantly, the DEIS does not address the environmental and social impact on small, neighborhood parks in cities like San Francisco next to the GGNRA. Because the GGNRA is located immediately adjacent to one of the most densely populated areas in the United States (San Francisco), it provides much needed recreational open space for Bay Area residents. If that open space is lost to recreational access, people and their dogs will move to the much smaller city parks and they will not be able to absorb the hundreds or thousands of people with dogs each day that will be kicked out of the GGNRA. As further proof that the GGNRA did not consider impacts on city parks in San Francisco, the Preferred Alternative suggests the nearest legal off-leash area in San Francisco to Fort Funston is Lake Merced. That off-leash area has been closed to off-leash for years and has been turned into a native plant restoration area and habitat for the endangered red-legged frog among other animals. Yet this is where the DEIS suggests people with dogs go. This exemplifies the lack of common sense and awareness present in these overly restrictive plans. For the sake of all San Franciscans, a better alternative must be reached. Furthermore, as an environmentalist, I believe there should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status can be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined ? by volunteers biased against dogs? by surveillance cameras? ? is not included in the DEIS. This "Dog Plan" is an attempt to move green spaces away from recreational use and towards preservation, which reduces uses for people too. This is blatantly inappropriate, as these "recreational areas" were designed specifically for urban dwellers such as myself to enjoy. The GGNRA should develop a new alternative, the A+ Alternative, that will better balance the recreational needs of the Bay Area with protection of natural resources. If this more fair and well balanced alternative cannot be reached, please choose Option A (no action). This meager 1% of GGNRA land available for off leash dog recreation is really important to those of us that cherish it. I pay taxes as both a resident and business of San Francisco and count on taking the dogs I care for off leash at Fort Funston. I am just one of many professional dog guardians, who act mindfully and responsibly while sharing the land. Conducting my business as well as recreating on this land means everything to me. I do not deserve to have it taken away. Thank you for considering my comments. Sincerely, Rasan Lowell SF CA 94122

Received: May,24,2011 21:45:20

Correspondence Web Form

Type:

Correspondence: I read the following letter to the editor in the San Francisco Chronicle on Thursday, May 12, 2011, and feel it perfectly reflects my feelings on the dog leash issue in the Golden Gate National Parks.

Please protect our precious San Francisco ecology by requiring dogs in the park to be on leash and by limiting the number of dogs a single person can bring into the park.

--- "Leash commercial dog-walkers"

Commercial dog walkers are abusing our parks.

As a frequent visitor to the Presidio, I encounter many groups of eight to 12 off-leash dogs in all areas of the park.

Although I love dogs, it does not seem fair or appropriate for commercial operators to allow their paid-for charges to run rampant in public parks where they threaten native wildlife and plants, as well as adults and children.

At the very least, these commercial operators should be limited to four on-leash dogs (the maximum one person can truly manage) in specific areas of the park.

They should be held accountable for infringements of park policies and, as other park vendors do, should have to purchase a license to operate in the park.

These funds could be used to enforce the regulations and maintain the dog-access areas.

Jean Colvin, San Francisco

--- <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/05/11/EDRE1JEE52.DTL#ixzz1NKeBoUeI>

Correspondence ID: 3188 **Project:** 11759 **Document:** 38106

Received: May,24,2011 21:50:01

Correspondence Web Form

Type:

Correspondence: I'm a professional dog walker and trainer in San Francisco and I take my pack of 5 - 8 dogs to the horse trails at Fort Funston. I've been going here twice a day for the last 4 years and have trained all of my dogs to respect, at

a distance, horses, hikers, and other dogs we may meet on the trails. I take pride in the control I have of my pack of my dogs and have taught my clients how almost every dog has this potential to learn such manners. Those who don't stay on leash until they learn.

I see hikers, without dogs, maybe once a month on these trails, and even when the weather is spectacular, I may likely be the only one on these trails. It's a shame to think this area may be kept from us, among the only ones who enjoy this land.

I recently was informed by a volunteer who picks up glass in this area that a pregnant coyote may have recently had pups, and to keep a look out for her or her pups. I immediately made sure my dogs kept from wandering in brush areas that may contain a coyote's den, and have spread the word to other dog walkers who frequent this area.

We are not anti-environmentalists, and are, in fact, in favor of preserving the beauty of the natural environment. And we are certainly animal lovers, and to any of us, the thought of our dogs harming other animals or birds is unacceptable. It is much more often individual dog owners who allow such activities than any dog walkers, in my experience.

We CAN strike a balance between continuing to allow dogs to run naturally and be controlled. Please consider using enforcement for those who do not control their dogs rather than taking away this amazing land from those of us who responsibly enjoy it every day.

Correspondence ID: 3189 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Web Form

Correspondence: There is a huge group of Dog Walkers at Fort Funston who voluntarily pick up all the trash and glass that washes ashore from human irresponsibility. Since we rarely see anyone else on these trails or walking along the beach - and certainly not with bags to pick up trash - we're quite sure we'd be the only ones to take on this task. We like the idea that due to our type of work, it allows us to contribute in this way to cleaning up an otherwise incredibly beautiful area.

And of course, we fanatically pick up after all our dogs, and those of other dogs, too.

Before Ft. Funston was used by dogs, it was used by reckless teenagers and homeless encampments, leaving trash and debris. One huge advantage to dogs' occupation of this area is that people responsibly use this area now, as

opposed to before it was discovered as a prime dog exercise and socialization area. There are certainly careless dog owners and dog walkers who are not consistent about picking up poo, but we are a growing group of walkers who take pride in our ability to make a difference in this way.

Correspondence ID: 3190 **Project:** 11759 **Document:** 38106
Received: May,24,2011 22:01:55
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean,

I am a San Francisco Resident that has, since moving to San Francisco enjoyed a number of the GGNRA areas under consideration ? in Particular Rodeo Beach in Marin, Lands End, Baker Beach, Crissy Field, Ocean Beach and Fort Funston in San Francisco.

I am also a ten year volunteer at the Marine Mammal Center in the Marin Headlands, I know and appreciate your work, and that of Brian O'Neill, for all the support the GGNRA has given to the TMMC over the years.

However I am dismayed at the DEIS and much opposed to the changes proposed for both generic and specific reasons which I will try to address.

? I have a very active dog, a Border Collie rescue Mix, and being active it requires DAILY running. This running is done by myself and/or our Dog Walker. She is insured and Bonded and, and I am sure of her professionalism. Everyone who knows dogs knows that a tired dog is a relaxed dog, and a relaxed dog is a well behaved dog. Off Leash exercise is so much more than on leash exercise. On leash exercise limits the dog to my level of fitness, and that means that by forcing on leash requirements you are binding the exercise of many dogs to that of handicapped, and elderly owners. My dog "forces me" to go out every day and take a walk, and although that can be in my local neighborhood it is nothing like our walks in the Marin Headlands, or Lands End paths, or along Crissy Field. Off leash walking is my time with my dog. He is always under voice control because my time at the park is my time with him ? we "work" together. These moments when my dog runs back and forth with a stick in his mouth are the reason I get in my car and go the GGNRA controlled lands. I always carry two rolls of poop bags on my leash and I will clean up other dogs poop if I find it when cleaning up after mine. I also participate in dog owner's park cleanups, be it in the City or out at Funston.

? The concept of ROLA is astonishing. As far as I can understand The NPS self appoints itself to monitor a compliance level of 75% based on total dogs observed not in compliance . Who does the observing? A third party? When

do the observing? Of course, for it to be legal I presume it will be done for 365 days every day from 5 am to 10pm when the parks close, because, if there is no one there to observe and 100 dogs use the park, and are in compliance they will not be tallied, which means your data is invalid. As you can see ROLA is non-sensical in the way you define it, in the way you set it up to self police, but even more so in the way you ascribe to yourself the powers to make reductive changes to the use of the park without proper due process. The Poison pill has to be eliminated from the plan as it is unenforceable and lacks any kind of scientific basis (unless, of course you can observe all users all the time)

The fact that this NOLA Compliance based criteria is included in all options automatically disqualifies your alternatives . ? The DEIS does not seem to consider demographics: Answer a question ? is dog ownership in San Mateo/San Francisco County/Marin increasing or decreasing? All the studies I have seen it is increasing. Therefore, as caretakers for lands given your trust for recreational purposes by those counties should you not take that in consideration and offer an alternative where you INCREASE off leash areas? Off leash areas, at the time of the 1979 Pet Policy was limited to only 1% of all the lands you administer. Since then new land has been added but you have DECREASED the percentage of those lands to below 1%. Why is there no alternative where you reflect demographics and the desires of the citizens of those counties who gave you the land and offer another alternative where you increase these lands? Alternatively, since you only have 1% of lands open to dogs, why not, if you take certain areas away can you not have an alternative where you give back other lands now currently closed? I would have loved to have seen somewhere in the DEIS something along the lines of "We are proposing removing XXXX from off-leash areas, but are opening up YYYY to off-leash use." You have the space. Why not use it? ? Your purposes, for the GGNRA is for RECREATIONAL purposes. These lands are NOT National Parks ? they are ex army installations and they were given in trust for you to administer in keeping with the original deed. You appear to treat Recreation as having an inverse impact on the areas under consideration, ignoring that Recreation WAS and IS one of the four outstanding values mentioned in the 1972 enabling legislation I quote : "maintenance of needed recreational open space". When Daphne Hatch your chief of natural resources management and science at the GGNRA says Quote: "Ocean Beach without the people is an incredible habitat, But people think of it as a sandbox or their backyard." I truly wonder if the NPS knows the difference between Yosemite and Fort Funston or Ocean Beach". When I attended one of your open houses I was told that I was told that NPS is mandated by Congress to "manage uniformly all its areas" she forgot also to tell me that Congress added "The authorization of activities shall be construed and the protection, management, and administration of these areas ? shall not be exercised in derogation of the values and purposes for which these various areas have

been established". So there is no mandate to match the GGNRA's policies with National Park Service requirements that dogs not be allowed off-leash in a national park. ? Snowy Plovers: Your own research - Forrest Cassidy St Clair and Warren all demonstrate that dogs do not actually impact the diversity, abundance and feeding behavior of the birds. The Hatch report observed 5692 dogs and only 19 chased plovers. Your own studies prove that parents with toddlers, surfers and other park users disturbed the plovers far more than dogs, yet I do not see anything in the DEIS that is further restricting their access. Why are dogs being singled out? Your environmental impacts are a whole bunch of "could occur" "may occur" but I do not see a single study that backs this up. You mention Bank swallows, and their nests, but they burrow in the cliffs, areas that dogs simply do not go to. . Ultimately your environmental studies do not seem to support your conclusions and you can be taken to task on this. I have tried to read the DEIS but I have failed to come across any actual solid scientific data that supports your premises. I see a lot of "coulds" and "mays" but no actual evidence and no baselines ? None. In fact, the one study I did read in full ? the one above ? demonstrated exactly the contrary to the "results you would have preferred. You had all the time to back up your claims with hard data. The fact is you have not been willing to do s - discrediting the scientific basis of this DEIS, or, worse still, the data contradicted your preferred solutions, and you have chosen to ignore it. I could not find an comparative analysis of the "No Action" option. The impacts appear based on non-compliance to existing voice control and existing regulations. At some sites, the DEIS prohibits dogs from beach areas to protect shorebirds and stranded marine mammals, yet there is no documentation in the DEIS of current shorebird or marine mammal impacts caused by dogs. ? So if you have no sound scientific data to support the environmental reason to restrict areas to dogs let's look at the safety issue. Well in this case your data is overwhelming in pointing to what are the causes of serious safety incidents ? 98% DID NOT INVOLVE DOGS. The problem is people, not dogs. Only 2% involve dogs. This alone should really force you to re-think the whole reason for the DEIS. ? The DEIS is concentrated on dogs, and ignores impacts caused by people and their children, mountain bikers, fleet week, walk-a ?thons, feral cats, coyotes, horses, surfers, etc etc. In other words. The DEIS appears to be a targeted exercise. Not a 360 degree look at the panorama affecting the GGNRA ? Why is the current system not working for you? Are you able to enforce the current No ?off leash zones? They are 99% of the lands you administer. If you can do it now why the need to change? If you cannot do it now, what additional funding will you require to ensure the new areas will be enforced? ? You TOTALLY ignore the impacts that these policies will have on the surrounding areas. If you squeeze dogs out of GGNRA lands where will they go? To overloaded City Parks ? Have you involved the City in this plan? You also have totally ignored the beneficial and human impacts of off leash interaction with one's pet. As I mentioned above, My mother cannot run so why are you wanting to limit

the dog's exercise level to hers? She currently can play with our border collie and use a chuck-it with minimum effort for her and maximum effort for the dog. When I go to the park I see people playing with the dogs of all ages, races and, presumably, financial background. I do not see anything in your study except a rather curious reference to "minorities" not coming to the parks because of dogs - The DEIS cites a 2007 SF State study that claims all Latinos and Asians surveyed said that dogs were a problem but if you actually read the study you discover some things: a) the study was not, as the DEIS implies an "ethnic minority visitor use experience at the GGNRA" but was actually a study born to help connect minorities to the parks. But more damning the study was hardly a scientific one ? they interviewed fewer than 100 people and they were not randomly selected. It is this kind of "selective" scientific use that will have the words "Drake's Estero" popping up in people's minds.

In conclusion it appears that this is a misguided solution in search of a problem. Your data simply does not support the existence of the problem, and your attempts to squeeze a NPS agenda on local parks is misguided and contrary to the spirit with which these lands were entrusted to you. The more I look at the lack of data, the more I fear that, what the Dept. of Interior report said about Drakes Estero can be applied to this DEIS and that it exhibits "sloppiness, from a protective approach to data, from a lack of vision, and from an insensitivity to the growing controversy, but not from any obvious intent to deceive, defraud or mislead." I really hope you are not trying to mislead but the lack of any evidence to your premises, causes great reason to wonder if the NPS does have an anti-dog which will be forced upon these Recreational Lands regardless of their negative impacts. For all the reasons stated above, but in particular for: 1) The existence of a "Poison Pill" compliance override on all the alternatives 2) The lack of scientific data supporting your premises

I support Alternative A ? the No Action Alternative and would also include New Lands area in that Respectfully

Alex Norton San Francisco

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|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 3191 | Project: 11759 | Document: 38106 |
| Received: | May,24,2011 22:16:23 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Being a lesbian of both African American and Mexican American descent, I have encountered a great deal of discrimination throughout my life, especially since I was raised in the South. I fell in love with San Francisco immediately since it was a place I no longer felt excluded. I have now lived here more than 25 years and am overwhelmed with love for my great city. | | |

The Preferred Alternative is based on a philosophy of separation and exclusion. It denies that different park users can co-exist. Rather than share space between different park users, the Preferred Alternative carves up park space into separate areas for different park users. This basic philosophy is the exact opposite of the way we approach problems in San Francisco. It flies in the face of the unique social qualities of San Francisco. The GGNRA needs to develop a new Alternative that will better reflect San Francisco values such as co-existence, shared space, collaboration, and education to address problems should they occur. Because of my love for this great city, I am writing to express my utmost concern for what might become of our parks if dogs were further restricted from GGNRA land. As an environmentalist, I understand the need to protect these beautiful recreation areas but restricting dogs from the land is not a realistic solution. Banning/restricting dogs from GGNRA land would only crowd other public parks with dogs. These "alternatives" should be reconsidered as they will only cause harm to San Franciscans. Please consider the outcomes of these proposals and their potential for disaster.

Correspondence ID: 3192 **Project:** 11759 **Document:** 38106

Received: May,24,2011 22:25:06

Correspondence Type: Web Form

Correspondence: As a Native American, I respect the land of my ancestors, and my family has lived in this part of Northern California for a thousand years. This debate continues to remain a debate between the nature of the areas of concern and what they are meant to serve. Pristine wilderness vs. multi-recreational urban land.

I take my dog to Fort Funston every day for off leash exercise, and there is nowhere else where she and I could renew our spirits than here. She or I could not be confined to a dog park, and I could not bear to see the state of the "dog run" area that the Preferred Alternative suggests after a few months.

This city has grown into an area of dog lovers and that won't change by re-thinking the nature of these areas and pretending they are wilderness lands.

Please penalize those dog owners or walkers who walk their dogs irresponsibly rather than punish all of us by taking away this critical land.

Correspondence ID: 3193 **Project:** 11759 **Document:** 38106

Received: May,24,2011 22:37:13

Correspondence Type: Web Form

Correspondence: I am a hiker, hike leader, mapmaker, and amateur naturalist. I have friends with dogs; I also have friends who restore habitat and observe birds and other wildlife.

I have been visiting GGNRA since 1976. I do not have a complete picture of the dog issues throughout the park; I do keep abreast of the regulations as part of my guidebook/map work, and hike throughout the park as often as I can. Generally things seem to be working, however, I can see where dogs do (or likely) now impact shorebirds or wildlife, and some areas definitely seem overused.

The preferred alternative seems quite a bit more restrictive than the current regulations, but at the same time, I trust there is some good thinking and research behind most of those changes, taking into account all the management objectives of the park. And I hope that you get some interesting suggestions from the public, and that you can sort it out from the hyperbole.

Having participated in iceplant removal and the native plant nursery in Fort Funston in the 1980s, I was heartened by early progress toward habitat restoration; 20+ years ago you could start to see how the landscape used to look. Today, much habitat has quite frankly been trampled by romping dogs (particularly the area between the Nike site/parking lot and the water fountain, but also beyond). Places I would have found lupine and dune plants 20 years ago are basically bare sand with pawprints, and public usage has shifted to majority dog walkers. (Part of this shift is the increase in dog visits; also contributing is the erosion and closure of the old Sunset Trail which provided a wider range of walking options than today's simple trails). I'm glad people (and their dogs) get out and enjoy this unit of GGNRA, yet I am also mindful of significant habitat degradation (in some areas), and if I wanted a "friendly" dog to jump on me uninvited, Fort Funston is where I'd go. (I don't particularly mind but certain family members who grew up on farms get restimulated by jumping dogs, and dislike visiting Funston despite all its other attractions). Plus I don't remember it ever smelled quite so much like dog pee, and the whole militant dog owner shtick toward rangers has been a big turnoff.

Other areas I've noticed dogs and wildlife have been Ocean Beach; not all dogs chase birds but some do (if not active pursuit then at least wander closer than the birds like, so they fly off). Over the course of a low tide the birds get interrupted a fair amount (to be fair, also by joggers, walkers, kids, etc). I imagine the presence of dogs in the Headlands could have some sort of impact on the activities of wildlife (coyotes, foxes, etc.) but have not observed any situations there myself. (We have a friend who rides a bike with his dog on a short leash (dampened by a spring), up the Miwok Trail from Gerbode Valley every week; both he and the dog really like it out there

and I just can't see them having a big negative impact). So I wouldn't say keep all dogs out of the Headlands; there may be some wisdom to shifting usage to front-country trails but I don't know all the factors in the Headlands.

The other change I've noticed is the proliferation of commercial dog walkers. I have lots of opinions (some pro, some con). Specific to GGNRA, I do think it would be a positive step to limit the number of dogs per person (speaking as a non-dog owner, three seems plenty for individuals). If commercial dog walkers are just coming to GGNRA because it's free and they're lazy, that's not good for the park as a whole. If they are well-regulated, keep a reasonable number of dogs under control, and don't dig up the place and scare off the wildlife, that helps keep things somewhat sustainable. (And measuring that, through various sets of glasses, is part of why this document has so many parts and pages).

Given my observations of dog usage/growth at Fort Funston in the last 30 years, it would also be good for habitat management and visitor experience, to regulate commercial dog walkers so you have a handle on things if usage shifts. I wouldn't want the dog licenses to be as sought after as taxicab medallions; more of a good conduct and dogs per person thing, but there may of course be situations where limiting the number of permits (at least commercial permits) would be desirable too.

That being said, there's something marvelous about GGNRA that you don't really have entrance booths or fee stations; you can just hop out of the car (or the bus) and go out into the wild. I'd hope that some of that simplicity of getting outdoors can be preserved for dogs and their owners (i.e. well-posted restrictions and limits versus annual permits for individuals). The other marvelous thing about the place is how wild it is - I've seen everything from mice to mountain lions out there, plus fox, coyote, hawks, etc. It's a fragile enough part of the world, perched alongside 6 million people, that management for wildlife and habitats should indeed take a high priority.

Best wishes and thanks for your work.

Sincerely,

Ben Pease

[P.S. Oddly, your brief survey leaves no place to say that, in addition to hearing about the document from a blog, I also spoke to a real, live ranger, and I would love to have that option for the future!]

Received: May,24,2011 22:39:02

Correspondence Web Form

Type:

Correspondence: Living in the Marina, I walk my 2 Yorkies at Crissy Field every day and it's hard to imagine that they would be restricted to being on leash due to the reasons cited in the Preferred Alternative. I prefer smaller dogs, personally, and don't necessarily appreciate bigger dogs running up to my dogs in a threatening way, but during my twice-daily walks to Crissy Field for 7 years, I rarely witness the wildlife or people being harassed that is claimed to be going on.

Not only that, but the Compliance-based Management Strategy I've been reading about is entirely unfair. Off-leash status can be changed in only one direction? That leaves us only toward the direction of more restriction and ignores the legal requirement that significant management changes must have a public process. How exactly is the information about compliance being determined? That information is interestingly vague and not mentioned in the DEIS.

This is San Francisco, not a communist state. We demand more participation in this 'complicity based management strategy' process that affects so many of us. This is San Francisco, and we've won rights in the past due to our strength and determination, which will hold true.

Correspondence ID: 3195 **Project:** 11759 **Document:** 38106

ID:

Received: May,24,2011 22:39:32

Correspondence Web Form

Type:

Correspondence: May 26, 2011

Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I grew up in San Francisco, and have been a dog owner my entire life. My last two dogs have been Labrador retrievers, so Crissy Field has been very important to me and my family, and our dogs who love to run and swim there. I live in the Richmond District, and walk at Crissy Field an average of once a week. I treasure its beauty and the fact that it feels wild, even though I'm still in the city. I also am amused and delighted by the sheer fun of seeing so many dogs and people enjoying themselves. And of course, we are so fortunate to have the GGNRA and its protection of wild lands near and in

San Francisco that was authorized when the GGNRA was created.

However, I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) are not based upon sound science or long-term monitoring of site-specific conditions.

As presented in the DEIS, the proposed dog management plan eliminates dog-walking (on and off leash) access for all new lands (additions to the GGNRA sometime in the future). The GGNRA's mission applies equally to new lands as existing lands and it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands.

Of course I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options besides restricting dog-walking access should be considered first. For example, it is not clear where dogs are allowed. I think the GGNRA should provide better signage and create more environmental barriers where necessary, such as the vegetative barriers surrounding the tidal marsh at Crissy Field.

In all my time at Crissy Field, I have see very few incidents of dogs going beyond the fences that enclose the dunes or the marsh, and even fewer incidents of dog aggression. I have never seen a dog be aggressive to an adult or a child. With the many dogs that are there on weekdays, and the hundreds that are there are weekends, I think that is quite remarkable, and certainly does not justify the restrictions being put forth in the GGNRA's preferred alternative.

As a responsible dog owner, I keep my dog under voice and sight control, clean up after her, and keep her out of the fenced dunes and vegetative areas. It is important that areas like Crissy Field remain open for off leash dog walking access. I know it is vitally important that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well-behaved dog. Having places where I can take walks with my dog allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA we currently have (approximately 1% of the total acreage of the GGNRA), I am very concerned that many dog and dog owners will not have sufficient opportunity to exercise and recreate.

Some specific problems with the DEIS include the following points. Please revise the DEIS to correct these errors:

This DEIS and Plan doesn't recognize that environmental values include

both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. I wish that the DEIS would include an alternative along these lines.

The proposed "compliance-based" approach should be modified to create a baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

I am also concerned that the DEIS doesn't take into account the potential effect of restricting off-leash dog walking on San Francisco's public parks, which could see a huge influx of dogs as a result. The GGNRA cannot do its planning without thinking of other neighboring recreation areas, such as the public parks, particularly in this time of limited resources.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so. The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts ? other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with

the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors.

The DEIS needs to provide full disclosure to the public and decision makers. If dog- related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone ? so that an informed decision can be made.

The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site-specific information that these areas are inappropriate for continued dog walking.

Many people have worked diligently both together and separately to study the DEIS and to make thoughtful comments on its findings, in hopes of encouraging the National Park Service to rethink and more carefully document its stance. The outcome of this plan will have an important effect on the quality of life for everyone in the Bay Area. I urge you to support Alternative A with individual consideration for any new lands, for the sake of the health and recreation not only of thousands of Bay Area residents and their canine companions, but for everyone who enjoys the GGNRA. Sincerely,

Mary Gregory San Francisco, CA 94118 Member, Crissy Field Dog Group

CC: Representative Nancy Pelosi Senator Barbara Boxer Senator Dianne Feinstein Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director District 1 Supervisor Eric Mar District 2 Supervisor Mark Farrell District 3 Supervisor David Chiu District 4 Supervisor Carmen Chu District 5 Ross Mirkarimi District 6 Supervisor Jane Kim District 7 Supervisor Sean Elsbernd District 8 Supervisor Scott Wiener District 9 Supervisor David Campos District 10 Supervisor Malia Cohen District 11 Supervisor John Avalos Mayor Ed Lee

Correspondence ID: 3196 **Project:** 11759 **Document:** 38106
Received: May,24,2011 22:40:50

Correspondence Web Form

Type:

Correspondence: To whom it may concern:

Please protect our precious San Francisco ecology by requiring dogs in the park to be on leash and by limiting the number of dogs a single person can bring into the park.

I feel Strongly that commercial dog walkers are abusing our parks. As a frequent visitor to the Presidio, I encounter many groups of six to twelve off-leash dogs in all areas of the park, "led" by dog walkers who in reality have no control over the animals.

Although I love dogs, and have four of my own ranging from 80-100 pounds, it does not seem fair or appropriate for commercial operators to allow their paid-for charges to run rampant in public parks where they threaten native wildlife and plants, as well as adults and children.

At the very least, these commercial operators should be limited to four on-leash dogs (the maximum one person can truly manage) in specific areas of the park. Also, it should be stressed that these pets should be on-leash, not under voice control in most areas. In real life, "voice" is not control, especially when the voice is not the owner of the pet, but a daily or weekly friend.

Dog walkers, and possibly their employers, should be held accountable for infringements of park policies. Also, like other park vendors do, dog walkers should have to purchase a license to operate in the park.

These funds could be used to enforce the regulations and maintain the dog-access areas.

Alyssa Andersen

Correspondence ID: 3197 **Project:** 11759 **Document:** 38106

Received: May,24,2011 22:47:15

Correspondence Type: Web Form

Correspondence: I am a San Francisco resident of over 50 years. You may have guessed that I am also a senior citizen. You may not have guessed that I am a professional dog walker. My small business means everything to me...it brings me great joy, and enables me to live in this very expensive city. My business is registered and I pay taxes. I handle my dogs responsibly, which involves picking up after them and making sure we do not intrude on other park visitors. I take my dogs to Fort Funston, Crissy Field and occasionally

Ocean Beach (where dogs are allowed off leash). Often when I'm caring for these dogs I pick up litter. Most of the litter is left by people. Because of my very small business, I am able to live...I also greatly improve the lives of my clients who could not be dog owners in this city, were it not for me. I have seen others in my profession act irresponsibly and I want to be clear that I do not approve of their behavior. Since it is the wrong-doers who are causing the issues in the first place, why not punish them rather than the rest of us? I deserve the right to conduct my business. Thank you for considering my comment. Sincerely, Gloria Kenny

Correspondence ID: 3198 **Project:** 11759 **Document:** 38106

Received: May,24,2011 22:53:11

Correspondence Type: Web Form

Correspondence: I moved here from NYC 5 years ago, and was thrilled that I could finally adopt 2 well behaved, well trained rottwiellers and have amazing places to socialize and exercise them, such as Fort Funston, where I go about 3 or 4 times a week.

As an African American male, I have often experienced others' concern when I enter a dog park or restricted dog run area with my dogs, despite their - and my - good manners, even though we may appear to others to be threatening, for a variety of reasons. Because of this, I encounter less discontent when I simply walk my dogs on the beach and on the trails, and to be forced into city parks or restricted areas would, no doubt, agitate others who frequent the park. I'm not giving up my dogs, and I can see how others, in my situation, will face conflict when forced into these smaller areas as well.

As I read this document, I don't see how the DEIS addresses this issue of all the dogs and people moving into city parks.

Correspondence ID: 3199 **Project:** 11759 **Document:** 38106

Received: May,24,2011 23:26:23

Correspondence Type: Web Form

Correspondence: I'm an Asian American woman and own a Bernese Mountain dog. She doesn't play fetch, doesn't particularly enjoy socializing with other dogs, but enjoys our hikes on the horse trails at Fort Funston, where we have been going on weekends for years. She ignores the horses and other hikers (unless they want to greet her, which she loves), and we would be lost without these trails. I would not hike them without a dog at my side, and they enrich both our lives beyond words.

The Preferred Alternative assumes all dogs are dog-park dogs, which is unrealistic and based on ignorance of dog behavior and individual personality. If the Preferred Alternative goes through, there will be an abundance more of dog/dog aggression in fenced in dog areas than the alleged incidences -that seem to be more annoyances - that are faced in off-leash areas currently.

Correspondence ID: 3200 **Project:** 11759 **Document:** 38106

Received: May,24,2011 23:47:56

Correspondence Type: Web Form

Correspondence: My favorite thing on earth is taking my twin girls to Fort Funston. We bring our yellow lab, Sugar who loves to run and play there. Watching my daughters play with Sugar at the beach is truly the most joyous event I have ever witnessed. Sugar was not always good with other dogs before we frequented this beach. Since there are often commercial dog walkers there, we have been able to meet many of them. The girls have learned to ask if Sugar may approach their group and the results have been fantastic! We have had so many opportunities from going to Fort Funston to make Sugar a well-behaved dog. The off leash play and socialization she has gained is so valuable to me and my family. We could not imagine not being able to have this experience. If dogs were restricted in these areas, I believe the result would be catastrophic. I would not want to bring my girls to a overcrowded dog park. There are too many dogs in this city to confine all into these very small, undesirable areas. Consider doing the right thing for San Francisco and don't take away our measly 1% of off leash dog land! My family along with many others would appreciate it. Best, Cynthia Richards

Correspondence ID: 3201 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please protect this vital and beautiful area.

Correspondence ID: 3202 **Project:** 11759 **Document:** 38106

Received: May,25,2011 08:53:58

Correspondence Type: Web Form

Correspondence: We are all responsible for our action and those who are under our control: including our dogs. Creating more restrictions on where we can take our dogs and how we need to restrain them WILL NOT CHANGE anything. It will just add to our frustration of dealing with an over-reaching government and constrain our enjoyment of outdoors.

I'm a new dog owner, but for years I enjoyed all those area that are discussed here while hiking and bicycling without a dog. I have never been bothered by dogs, or witnessed any damages done by them. Most dogs owners are responsible. Why would we apply the collective punishment by restricting the dog areas use because of the irresponsible behavior of a very few dog owners? I VERY STRONGLY SUPPORT Option A: CHANGE NOTHING!!!

Correspondence ID: 3203 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 25, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan:

I have 2 dogs, I am a strong supporter of the environment, I am a volunteer

with the Audubon Society, a farm and wilderness guide with an environmental education program, and a citizen of the bay area and I oppose this plan because it will drastically limit my favorite form of recreation: walking my dogs on the beach. I am well informed on environmental issues and I cannot imagine how this plan will improve the environment.

I moved to the Bay Area in 2008 and was shocked by the limited number of places where I could take my 2 well behaved dogs for a walk off leash. After researching, talking to people, and exploring the area I finally found Fort Funston and the GGNRA. I was thrilled to discover that there was still a place in the area that allowed my pets and me to go for a long walk, play in the ocean, romp with other dogs, and make friends. I have seen a huge amount of diversity in the people who come to enjoy the beach, and I have seen the community that is built around this amazing place. I have met children and their parents who do not have pets, but visit the beach to play and enjoy the experience of GGNRA as it is now. I have seen countless visitors laughing and having the time of their lives, I have seen folks taking it upon themselves to keep the area clean, but most of all I have seen my 13 year old dog acting like a puppy. Please preserve this experience for generations to come!

Sincerely, Cristin McKee Mountain View, CA 94043

Correspondence ID: 3204 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 05/25/2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy.

Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA) Sincerely, Juan D Roa San Francisco, CA, 94107

Correspondence ID: 3205 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled,

minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

-Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. -Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. -Exclude speculative, exaggerated, biased, or misleading statements and studies. -Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). -Enable professional dog walking and align any professional dog walking rules with county or city regulations. -Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Respectfully submitted on behalf of myself and my dog,

Kate Mulhearn Oakland (and formerly San Francisco), CA

Correspondence ID: 3206 **Project:** 11759 **Document:** 38106
Received: May,25,2011 11:23:41
Correspondence Type: Web Form
Correspondence: Have a heart when you are making your final decision regarding the off-leash areas. GGNRA currently gives a mere 1% to dogs, that's not a lot. Dog owners pay taxes as well as non-dog owners and are entitled to their space, please keep that in mind. Thanks in advance for a positive outcome.

Correspondence ID: 3207 **Project:** 11759 **Document:** 38106
Received: May,25,2011 11:39:48
Correspondence Type: Web Form
Correspondence: May 25, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022 (415) 561-4720
Dear Sir, I believe that the recommendations in the GGNRA Draft Dog Management Plan are overly-restrictive and represent a major departure from the current, balanced use of the park. The GGNRA's goal has always been to bring the park into compliance with a federal rule (36 CFR 2.15)

which bans off-leash dog walking in national parks. But the San Francisco Bay Area has a unique culture, history and community. Instead of trying to force the GGNRA to look like every other national park, the GGNRA board should respect the citizens' commission of 1979 and the unique history of the land. I believe we should be seeking ways to make the San Francisco Bay Area friendlier to dog and cat guardians. The GGNRA's proposal is a step backwards for animal welfare in the Bay Area. I hope the GGNRA Board will modify its proposal to be more balanced and friendlier to dog guardians. Sincerely, Patricia Klein Kentfield, CA 94904

Correspondence ID: 3208 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 25 May 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan and its preferred alternatives. The plan relies on speculations, manipulated statistics, exaggerated examples, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

?Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ?Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San

Mateo County. ?Exclude speculative, exaggerated, biased, or misleading statements and studies. ?Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ?Enable professional dog walking and align any professional dog walking rules with county or city regulations. ?Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

As a passionate dog rescuer, I can tell you that the preferred alternatives in the Plan will make the Bay Area's homeless animal problem worse. Less people will be able to or likely to keep their companion animals if they are stripped of places in which they are able to properly exercise their animals. The Plan is akin to putting more burden on our shelters and sending more dogs to needlessly die.

Not to mention that, in years of walking Ocean Beach or Crissy Field every single day, sometimes with dogs and sometimes without dogs, I have yet to see any wildlife or sensitive plant habitats harmed or infringed upon by companion animal dogs. Dog owners that use this RECREATION area are inherently responsible and value all life. They would be more likely than the average non-dog owner to protect and conserve (not litter, not throw any cigarette butts or smoke in the first place) our recreation areas during and after use.

Please don't send more dogs to needlessly await death in shelters; please don't support the killing of animals in shelters by stripping otherwise responsible dog caretakers of their dog-friendly recreation areas. Dogs are the innocents that need to be protected.

Sincerely,

Christine Hogan San Francisco, CA 94116

Correspondence ID: 3209 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/25/11 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations,

and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: My husband and I just moved to San Francisco, and we have visited almost every dog park and beach in the city, checking out neighborhoods for ourselves and our two dogs. We have been nothing but impressed with the condition of all the parks and off leash beaches - dog owners in San Francisco are even more responsible and conscientious with their dogs and scooping waste than the people of New York - we spent four years there using Prospect Park, and the park space and beach space there was well respected, but San Franciscans take even better care of their off leash space. There is simply no legitimate reason to restrict the current off leash space
Sincerely, Kimberly Saunders San Francisco, CA 94103

Correspondence ID: 3210 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not

based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Align commercial dog walking rules with county or city regulations.

These are my personal comments and observations regarding this plan: I have lived in the Bay area for over 15 years and have always been a responsible dog owner. I walk my dog at Crissy Field and run along the paths in the Presidio each and every day. My healthy lifestyle and enjoyment of these areas would be negatively impacted by this plan. In addition, the city parks where I take my two children would be overrun by dogs if this plan were to be implemented. I believe there is a better way. Sincerely, Tracy Falconer San Francisco, CA 94115

Correspondence ID: 3211 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: wonderful way to get out and see the city, socialize, and exercise.

Correspondence ID: 3212 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean: I am 33 years old, and have been a San Francisco resident for 9 years. I was born in Taiwan and consider myself an ethnic minority. I am an animal and nature lover and have been a pet guardian in the past. I am very concerned about the proposed changes to the GGNRA. I believe off-leash dog activity in the GGNRA is essential to the well-being of both dogs and humans. Dogs get needed exercise which keeps them well-behaved and these particular off-leash areas allow for unique and healthy human social interactions. I have become familiar with the proposed

GGNRA changes. I oppose the Preferred Alternative because it is too restrictive. I would like to see the Park Service revise the dog management plan to retain and formalize the existing GGNRA dog policy (aka the 1979 Pet Policy) plus provide for balanced off-leash areas in San Mateo County and new lands and remove any proposed rules to reduce or ban dog recreation based only on violations; compliance-based management strategy cannot be part of any plan. I would like a revised plan to measure the impact of dog recreation on the health and well-being of people. I would like to see disadvantaged groups and others able to provide unfiltered comments on their preferences and barriers to using the GGNRA. I, also, believe the GGNRA should provide better signage and that a revised plan should include awareness programs. A revised DEIS should exclude speculative, exaggerated, or misleading statements and provide site-specific need for actions and dismissals of suggested alternatives. Objective standards need to be applied to any recreational activities. The GGNRA should develop a new alternative, the A+ Alternative, which will better balance the recreational needs of the Bay Area with protection of natural resources. Thank you for your time. Respectfully, Marie Blackard San Francisco, CA 94103-3694

Correspondence ID: 3213 **Project:** 11759 **Document:** 38106

Received: May,25,2011 13:11:05

Correspondence Type: Web Form

Correspondence: I recreate daily with my dog on POST (soon to be GGNRA) land here in Montara. By my informal count, somewhere between 7 to 8 out of ten people recreating on this land are with dogs. If you ban dogs from this area, I wonder who will be recreating here? I and many others have been using this area for 30 years to walk with our dogs. In all that time I have seen no evidence where our dogs damaged the land. I do not see anywhere in your 2,000 plus page study any indication that dogs have damaged these lands. With regard to wildlife, I have never seen a dog catch a garter snake or a frog. We do not have snowy plovers on this land. There are plenty of coyotes here. Certainly they are a much greater threat to wildlife than our well fed domesticated dogs. They certainly make their own unsanctioned trails. By your reasoning, must they be removed?

Please come down here and gather factual data before you make rules based on unformed opinions.

Correspondence ID: 3214 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 25, 2011 Frank Dean, General Superintendent Golden Gate National

Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I regularly enjoy using the GGNRA. I am writing to OPPOSE the GGNRA's draft dog management plan. It is not based in fact; It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area.

GGNRA's original mandate was for recreation. The courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the needs of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their dog companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. (e.g., horse riders, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). These are my personal comments and observations regarding this plan: Dogs need off-leash exercise to help prevent behavioral problems. If dogs develop behavioral problems, they are more likely to be surrendered to our city shelter, Animal Care and Control. My organization, FixSanFrancisco.org, advocates for sheltered animals in San Francisco.

Sincerely, Julene Johnson San Francisco, CA 94117

Received: May,25,2011 13:18:29

Correspondence Web Form

Type:

Correspondence: In response to the DEIS Dog Management Plan, I would like to comment that we should all strive to keep what limited dog access we have to the GGNRA areas and that those areas should be managed with dog/human/wildlife/environment issues as a central core. As a neighbor to the park (Oakwood Valley) and steward/caretaker of it for more than 25 years, I am confident that I have a good measure of experience with the areas in question in Marin County.

While I strongly believe that dogs in the park, both off-leash and on-leash, have limited impact on the park as a whole and most likely less impact on the park than humans without dogs, overall, I do understand that in certain circumstances, dogs should be limited by fencing, signs and other means from accessing key sensitive areas. With that in mind, these areas should be limited to humans as well. I don't see any scientific studies in the plan proving that dogs do more damage than humans in the same areas. Whereas in life there are always a few people who do stupid things and spoil a good thing, that same bunch with dogs may occasionally do stupid things in the park. This is not a reason to ban dogs, though. It is a reason for more education and human interaction with those people, via rangers and/or volunteers. So, for instance, a stronger volunteer program with park interpretative volunteers interacting with dog owners/walkers at key locations would be a better alternative than closing access to people and dogs in those areas. I do see this as being a needed component to the restoration work at Muir Beach and I believe that it should be tried as a first resort.

My specific knowledge is with the Oakwood Valley area in Marin. I have been walking my dogs there for 25 years. In that time, I have only seen one negative dog/human interaction and it was with a young owner and a pitbull mix that was out of control. While this was an unnecessary and unfortunate occurrence, it was also a rare one. We should not punish everyone for the very rare, but poor choices occasionally made by a few individuals. While some people may wish to walk in areas without dogs, the overwhelming majority of trails and areas in the GGNRA are, and still will be, off limits to dogs. Tennessee Valley, for instance, just up the road from Oakwood Valley, encompasses a very large tract of land with many trails, all but one of which is off limits to dogs.

One thing I would like to add here is that creating dog walking loops of trails is generally better for both the humans and dogs than a short out and back trail. In Oakwood Valley we have enjoyed several loops from the Crest Marin neighborhood (Birdland) access points. In the main body of Oakwood Valley itself, we have a good loop that goes up the fire road from Tennessee Valley Road, and then loops back via a single track trail that may get cut off

in the current plan. I disagree with the logic for cutting off that single track as it adds variety and good dog training elements to the loop. The majority of people I meet on this trail are more than happy to share it with dogs. Where is the science that says otherwise? There has been no negative impact from dogs on this trail in the past. The biggest problem with dogs here is with the owners bagging the poop, but not picking it up. I for one, am one of the neighbors who does pick it up, and other people's as well.

Another loop of key importance to our neighborhood is accessed through the Fernwood Cemetary and comes out at the fire road near the water tank on the Alta trail. This historically has been a great source for walking dogs off leash along the Alta trail and then connecting to the upper portion of the Oakwood Valley Trail, then continuing down through Oakwood Valley fire road and out to Tennessee Valley for the return.. This longer, more vigorous loop is ideal for getting good exercise for both humans and dogs. It is consistently used, but I would not say it is overused. I am aware there is Mission Blue butterfly habitat along a stretch of the Alta trail and it is marked off and signed. Most people respect and pay attention to this. Perhaps a few don't. Again, education, better signage and perhaps more fencing could improve this for both humans and dogs and the butterfly. But in my 25+ years of experience walking these trails, I haven't seen any negative impact from dogs on lupine plants in this area. I have seen negative impacts from humans, and certainly from Scotch Broom. Is there any true science that shows negative impact from dogs in this area? Or is the impact from other sources?

My main concern is with the closing of these two key loops in the Oakwood Valley area. I highly recommend that these important loops be kept open and available to people with dogs. I have not seen any evidence in the DEIS that shows why these areas should not be open to dogs as currently used.

Dog owners that live near the parks have been using these areas for dozens of years. We are a diverse group of regular park users that have been getting squeezed down to smaller and smaller areas where we can recreate with our dogs. This is not good for the people, the dogs or the community. Our communities are more heavily impacted by overuse of limited dog areas for this exact reason. We need to keep some large areas with realistic loops for people and their dogs to recreate and learn good dog behavior in a natural environment. This encourages good human/dog interaction outside of the park as well.

Correspondence ID: 3216 **Project:** 11759 **Document:** 38106
Received: May,25,2011 13:25:25
Correspondence Type: Web Form

Correspondence: As it stands we dog owners have more restrictions then we can count. Don't let the dogs run free, vaccinate them every year despite the fact that it is detrimental to their health, pay licensing fees, spay/neuter them and the list goes on and on. I do not see these restrictions on cat owners or other pets. We love are animals, they are part of our family, so why are you singling us out with additional restrictions? Why take dog parks and off leash areas away from us?

Correspondence ID: 3217 **Project:** 11759 **Document:** 38106

Received: May,25,2011 13:26:00

Correspondence Type: Web Form

Correspondence: I have read part of the DEIS for Dog Management in Golden Gate National Recreation Area, focusing on the sections pertaining to Fort Funston, where I like to walk my dog off-leash. It seems to me that with 20 other sections in the GGNRA the NPS could leave Fort Funston as is, i.e. with minimal leash restrictions. Urban dogs are typically cooped up indoors (or, if they're lucky like my dog, also have access to small back yards) for long periods of time. An inability to run free and burn off energy can have health and behavior impacts on these dogs. They need places like Fort Funston.

I understand concerns regarding dog fights, bites and unpicked-up waste, but these really are in the minority. A percentage of humans also commit violence against each other and other species, and trash the environment, but nobody's talking about putting them on leashes. Please don't fall into the typical trap in public policy where the actions and exceptions of the minority result in inconveniences and restrictions for the well-behaved, law-abiding majority. LEAVE FORT FUNSTON ALONE!

Correspondence ID: 3218 **Project:** 11759 **Document:** 38106

Received: May,25,2011 13:26:18

Correspondence Type: Web Form

Correspondence: I am a native to the bay area and feel one of the main things that keeps me here is the blend of city and parks. We have beautiful cities and beautiful parks. I take my dog to Golden Gate Park, Ocean Beach and Crissy field often so that he can stretch his legs. This exercise allows him to stay out of trouble when he is home making him a better pet for me and my neighbors. By restricting dogs from many of our parks and beaches you may be creating another problem with dogs in the urban areas. These dogs will have less access to places to exercise and will cause much more problems in the other crowded places of the city. There is no question that well exercised dogs are better behaved dogs. Many issues that make the news involve dogs locked up and not receiving the exercise they need to stay urban friendly.

While I understand the need to protect wildlife, I don't feel dogs need to be removed in order to do that. As a responsible dog owner, I keep my dog on leash in crowded areas or when wildlife is visibly present. I take my dog to the less crowded parts of parks and beaches so that he can run without bothering anyone. Of course there are irresponsible dog owners who have a tendency to ruin it for others. But keep in mind, there are also irresponsible parents and people, who litter in the parks, allow children to chase animals, and violate a variety of other rules on a daily basis.

I also understand that some people are afraid of dogs and would like to restrict dogs from public open spaces. While I know there are occasional issues where an unleashed dog will frighten a person, it seems those instances are few. I know it may not be fair but these people also have to deal with dogs sitting in front of their favorite restaurants in San Francisco, wandering some of their favorite stores and a variety of other places in San Francisco. They seem to endure those encounters so it seems in a place like a park, where most people expect to see dogs, they will also manage to endure. San Francisco has a long running history of allowing all and requiring that we coexist happily. Rules like these toward dogs almost seem anti-San Francisco.

Instead of creating a variety of rules, why not promote responsible pet owners. The rules described seem like they will be hard to follow and enforce. Each park/beach seems to have inconsistent boundaries and rules, making it hard for even a law abiding owner to follow. I have found that the signs stating the rules are rarely informative enough to follow these types of rules. Wouldn't it be better to just enforce the rules that currently exist? I'm sure not picking up after your dog is already against the rules, as is having an unruly dog off leash in a public place. By enforcing those rules you would create a much more positive environment for both dog owners and other park users.

In a time when public parks are already in danger restricting a huge percentage of their loyal following seems like a poor business decision if nothing else. If you were to pole the people who use parks, I am sure you would find the majority of the daily and weekly users are the dog owners. The people who would benefit most from these new rules are not the ones who consider a walk in Golden Gate Park just park of the neighborhood nightly walk. They are also not the ones who go to Ocean beach the 200+ days its freezing cold. I know as a dog owner my passion for the parks would be almost no existent with the passage of these rules. I go to these parks about 100+ days a year with my dog and about 3 without.

Correspondence ID: 3219 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00

Correspondence Type: Web Form
Correspondence: 25 May 2011

Frank Dean, General Superintendent
Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, CA 94123-0022

Dear Mr. Dean,

As president and representative of the Portuguese Water Dog Club of Northern California (PWDCNC), I am writing to oppose the GGNRA's draft dog management plan.

In summary, members of our Club enjoy off leash recreation at a number of the beaches and parks of the GGNRA, both as individuals and as organized Club events that occur throughout the year. Many of us have grown up in the Bay Area enjoying the open spaces of the GGNRA which have been historically open to off-leash recreation by dog owners and their dogs. When the GGNRA was created, the lands were designated as an urban recreation area, open to all, including dog owners and their dogs. The off-leash designations were different from and despite the National Park Service's usual draconian rules restricting off-leash dog recreation in all National Parks.

The urban recreation designation took into account that the GGNRA is surrounded by dense urban areas and was the outlet for millions of visitors as relief from urban stress and pressures. This designation (and the accompanying off-leash dog area) has been upheld in several Federal court decisions since 1978, maintaining that it is consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

The Supervisors of San Francisco City and County have resolved to keep the GGNRA dog management at the 1970's levels and are opposed to the current plans. The NPS must have regard for the fact that the GGNRA can accommodate both recreation and conservation, and has for decades; that the many acres of the GGNRA are not pristine wildernesses to be enjoyed only by the select few. The NPS must not discriminate against or exclude the Bay Area residents -- families, seniors, the disabled and minorities -- who exercise regularly with their canine companions.

We would encourage you to do everything in your powers to retain the small percent of off-leash dog areas currently available to responsible dog owners. Management of dog issues and dog walkers should reflect the codes of the municipalities in which the park areas fall.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

* Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. * Exclude speculative, exaggerated, biased, or misleading statements and studies. * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). * Enable professional dog walking and align any professional dog walking rules with county or city regulations. * Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

To close, the Bay Area boasts a large population who choose to include dogs in their families as family members. And, they choose to exercise for the health of themselves and their companions in the parks available to us. The majority are responsible dog owners, who have taught their dogs good people and dog manners, have cleaned up after and supervised their pet's play. We often leave areas cleaner than we found them!

We urge you to review this plan and work with the companion dog owner community to find a balance of recreation and conservation. We support respecting the needs of dogs and dog owners for managed, unrestricted recreation in the few areas that were intended in the original GGNRA plan.

We do not support the proposed plan and will continue to oppose it.

Sincerely,

Ali Vorhies President Portuguese Water Dog Club of Northern California
www.pwdcnc.org (est. 1992, 300+ members residing in the nine Bay Area Counties)

Petaluma, CA 94952

_____ (city, state, zip)

Correspondence ID: 3220 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Enable professional dog walking and align any professional dog walking rules with county or city regulations.

Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

With the state budget in crisis, where will the money come from to enforce these new restrictions? Furthermore, who will pay to police the city parks that will almost certainly experience an influx of dogs?

How did the GGNRA come to have no accountability to the public whose recreational needs it supposedly serves?

I am a tax payer with dogs. It is not unreasonable for me to expect that there would be designated spots in the Bay Area where I could walk my dogs. Please, do not lose sight of your original charter--recreation for the citizens of California.

Katherine McCormick

Correspondence ID: 3221 **Project:** 11759 **Document:** 38106

Received: May,25,2011 14:31:49

Correspondence Type: Web Form

Correspondence: Let's start here: I like well-behaved dogs, preferably those with trained owners. I don't own a dog presently but, with hand or voice signals, can usually handle any dog that was been trained. I believe that open space is best served as available to those with and without dogs. Separating the two spaces is often best: dogs and owners can frolic and exercise in an area devoted to off-leash dogs while those desiring not to be where the dogs are can contentedly do the same elsewhere. No worries about troublesome or accidental interactions.

I come to this from experience. Here's a sample:

An off-leash boxer ran up a multi-use path toward me, jumped onto my chest, and damaged a newly healed incision. Its owner never stopped her conversation to notice, let alone control, her pet.

Riding my bike on a broad boulevard with light traffic, a Doberman ran out from a backyard obviously with a purpose, crossed the large yard, and clamped onto my ankle. He pushed me and my bike across the boulevard without letting up on his clenched jaw. No owner seen.

Walking on a sidewalk, after making eye contact with the dog walker and giving wide berth, I tried to pass a Chihuahua on-leash. The dog lunged onto my calf and dug in nails as it slid down my leg. The person reprimanded me for not wearing long pants. Nothing was said to the dog nor was the leash shortened to put distance between us.

Thank you for the thoughtfulness directed to this matter.

Correspondence ID: 3222 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 25, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy.

Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Enable professional dog walking and align any professional dog walking rules with county or city regulations.

Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: I regularly frequent dog parks around the city, including (but not limited to) Fort Funston, Crissy Field, and Ocean Beach. These are areas where my dog can run freely, with or without other dogs, and be able to get the exercise he needs. We are able to keep him out of any protected habitat restoration areas (e.g. along Crissy Field), so that the natural wildlife is not disturbed.

Not only are these places critical for the well being of my dog (and those of countless canine companions in San Francisco), but it is the time within each week that I most look forward to, as it has become a part of my routine. It is important for my own health and well-being to not only enjoy these spaces, but to share them with my canine friend(s). I can't tell you how much enjoyment I receive from playing with my dog, having space to run and play ball, being outdoors, and enjoying nature and the wonderful parks and outdoor space that this city has to offer WITH MY DOG! Please don't take away this right of mine/ours. The intention of these spaces is to be used for BOTH recreation and conservation. I don't understand why we have to choose one over the other. To do so is both one-sided and short-sighted. Thank you.

Sincerely,

Kari Loken San Francisco, CA 94117

Correspondence ID: 3223 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces."

As an avid dog lover who loves the outdoors, I find that the GGNRA is already far too restrictive of dogs in the Parks. For example, we don't feel we can bring our dog to Pt Reyes because of the excessive dog rules, so we often just don't go. Alternatively, we love bringing our dogs to Pt Isabel in Richmond. Dog owners are very appreciative of a chance to exercise in a beautiful area. I see the vast majority do pick up after their dogs and are considerate of other people. Our dogs are giant breed dogs and, even in off leash areas, I always leash my dogs when I see the elderly or toddlers approaching for their safety. (Our dogs are gentle giants, but could accidentally knock a frail person over.)

Please do not further restrict the chances for us to visit parks with our beloved companions. Thank you.

Correspondence ID: 3224 **Project:** 11759 **Document:** 38106

Received: May,25,2011 15:11:09

Correspondence Type: Web Form

Correspondence: Please keep the areas open to dogs off leash!

I used to live in San Francisco and got used to taking my dogs to Fort Funston and Ocean Beach. These are safe areas to have our dogs get some real exercise. I have rescue Pomeranians and they needed to run to really get their energy out.

I live in Oakland now but still come over to the beach as Happy is now blind., but he remembers the ocean and is comfortable to run a bit off leash. And, Laddie has always had a deformed foot and cannot run on hard surface - the sand is perfect and he runs without any limp! Please don't take this away.

I am sure there is a story behind each dog owner's desire to have these parks available to our dogs. I feel like people have every other park and beach area to go to. To have two spots in the City that serve the whole Bay Area is not too much to ask.

Thank you for your consideration,

Jessica Waters, Happy and Laddie.

Correspondence ID: 3225 **Project:** 11759 **Document:** 38106

Received: May,25,2011 15:12:58

Correspondence Type: Web Form

Correspondence: As someone who does not have children, my two dogs are my family. We need somewhere to go off leash. There is a way to make this work without entirely closing these areas off to the dogs off leash. There are so many dogs and so many dog owners in this City, that if you eliminate off leash areas, you are not servicing a critical need and significant population of the City/State/US residents of San Francisco, Marin County, San Mateo County and EastBay visitors (who come into the City to walk their dogs off-leash in these beautiful areas of the City). I agree with many of the Alternative Maps and I have specific comments on the proposed Baker Beach Plan and Sutro Heights Park plan and I have a specific request for a small stretch of road inside the Park Presidio Trust gates at 14th & 15th Avenue. My comments follow. Thank you for your consideration.

Regarding Baker Beach, which is the area I most visit with my dogs. I

would like to request and comment that there is a small but perfect off leash area on the left side of Baker Beach with a natural water barrier to the rest of the very long beach with a significant area for non-dog owners to enjoy. All of the neighborhood locals go to the left side of the beach (under the houses) to the left of Lobos Creek outlet. PLEASE at least keep that area to the left of Lobos Creek open to dogs off leash! It is extremely difficult and absolutely no fun for the owner or the dog to be on leash at the beach because your dog who wants to swim and run...Even our little 13lb dog wants to run here. PLEASE keep this small area of Baker Beach open to dog-owners with their dogs off leash. As the Lobos Creek water run off is not really an area that children should be splashing and playing in anyhow...how clean is that water?...I believe that the dogs should at least be allowed this small portion of the beach...OR if this is impossible, at least say that dogs can be off leash up until 11am in this area and after 4pm...something like that rather than entirely banning the dogs from being off leash in this small area of Baker Beach.

Also I have a specific area that I would like to request be designated an off leash area in the Presidio Trust Area:

The area is just inside of The Presidio gate at 14th & 15th Avenue and on the road around to Mountain Lake park should all be off lease (there is an enormous dog walking population in this tiny area that is already closed off to cars) The Federal Presidio Park Police love to catch dogs off leash in this low volume walking area for the general public....the majority of the users in this area are local neighbors walking with their dogs. It is a tiny road that leads from the 14th & 15th Avenue gates to the gate for the Golf Course and around the Lake. As this area is almost entirely used by dog owners, it does not make sense to be ticketed for being off leash on this 1000 to 2000 foot stretch of access road by Federal park police.

It would also be great if the woods to the left of the Presidio Landmark from the trailhead parking lot down to Baker Beach should be off leash.

Sutro Heights. I would say that at least half of the Sutro Heights Park Users are dog owners. It is ridiculous to make this a leash only area with the amount of dogs in this park. These dogs are generally well behaved and mostly belong to neighborhood residents who have been using this park since these dogs were puppies. Everyone knows each other. The interaction between most dog owners and the other users in the park is very favorable. As an example, I walk one dog on leash the whole walk and the other dog (who is under voice command) goes off leash once we are into the park and then as we walk around the overlook and around the loop, then I usually hook her back up as we start to leave the park. Even with all the weddings and picnics going on, I have never seen a dog off leash bound into the

middle of a wedding or a picnic.

I support the area designated for dogs on Map 10 Preferred Alternative at Crissy Field.

I support the area designated for dogs on Map 16 at Fort Funston, except that I would like to see at least the road down to the beach on the right side be open to dogs off leash because sometimes I don't want to walk all the way onto the beach.

I recognize the importance of sharing these resources with everyone and that as a dog owner it is important to not let our use disrupt the use of others, so from my perspective a leash law is not necessary. Also, from years of observation, I am pretty sure that people who let their dogs off leash will still let their dogs off leash, even if you change the law.

Correspondence ID: 3226 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Greetings,

I am writing today because I dearly love Golden Gate recreation areas and hope that you will develop higher levels of protection for the wildlife in these areas. Some ideas below that I hope you will consider:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Sincerely, Amber Tidwell

Correspondence ID: 3227 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect the myriad unique species at risk!

Correspondence ID: 3228 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Protect all wild life !

Correspondence ID: 3229 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

My thoughts regarding the above are as follows:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3230 **Project:** 11759 **Document:** 38106

Received: May,25,2011 15:16:45

Correspondence Type: Web Form

Correspondence: Although I agree that wildlife needs to be protected there is no evidence that dogs are harmful or endanger these bird. I would say that most dog lovers are also lovers of all animals both domestic and wild and would not like to see any harmed. For years there has been an are curtained off for the Snowy Plovers and I know that while most dogs are of leash the owners make sure they do not go onto the protected area. Protecting wildlife and allowing dogs off leash is not mutually exclusive, both can occur. Allowing off leash dog areas is beneficial to humans, it provides great joy to see your dog run after a ball, it is motivation for me to walk with my dog. Walking on leash is no where near as enjoyable. As city dwellers it is crucial for our human well being to have off leash dog areas particualry near and on the beaches. I am a great supporters of parks and have a life membership with the NPS

Correspondence ID: 3231 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As a California resident I know that Golden Gate National Recreation Area is one of our country's most unique parks, because it is near a heavily urbanized area. As well, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned.

However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals.

Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. Did

you know that the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers?

I am respectfully asking you to do everything in your power to preserve and protect this treasured park area.

Correspondence ID: 3232 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

Correspondence ID: 3233 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I want to protect the wildlife in the golden gate park. Stop letting people disrupt this precious species habitat. thank you

Correspondence ID: 3234 **Project:** 11759 **Document:** 38106
Received: May,25,2011 15:20:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 3235 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3236 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please protect this park and its wonderful and varied wildlife. My family and I have visited a number of times and repeatedly have taken friends and family from all over the country to this great place. It simply must be protected for future generations. Thank you!

Correspondence ID: 3237 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not

allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3238 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, - Hugh Mason

Correspondence ID: 3239 **Project:** 11759 **Document:** 38106

Received: May,25,2011 15:22:02

Correspondence Type: Web Form

Correspondence: Here is a great opportunity to protect wildlife in an area that is close to an urban environment and to provide an example of what is possible in the field of wildlife preservation. As taxpayers we are often called upon to contribute to protect wildlife that we will never see, but here in the Golden

Gate National Recreation Area, we will be able to actually see our tax dollars at work, as species on the verge of extinction will be saved for future generations to view.

Correspondence ID: 3240 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Save the Environment!!

Correspondence ID: 3241 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: preserve our wild spaces please

Correspondence ID: 3242 **Project:** 11759 **Document:** 38106
Received: May,25,2011 15:24:32
Correspondence Type: Web Form
Correspondence: This area is a university of diversity. Planning must consider its educational value and make available access with respect and supervision. This generation of school children can grow up with the knowledge and respect for the unique creatures and plants of the Bay region to help preserve them for their children.

Correspondence ID: 3243 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: i support anything that helps support the continuation and protection of these birds.

Correspondence ID: 3244 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet

unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. The park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

I am very much a dog person, however I don't feel that unleashed dogs should be threatening wildlife. In my opinion, Alternative D best reflects the national park values.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your consideration.

Correspondence ID: 3245 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect the animals in this gorgeous part of the world!

Correspondence ID: 3246 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: My family has lived in the San Francisco area since before the 1906 earthquake (and in California a lot longer than that) and I grew up near San Francisco. I am totally alarmed that this is even an issue. I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. This is a no-brainer folks.

1. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national

park values.

2. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

3. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

4. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

5. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

To preserve these habitats is why we even have a park service.

Correspondence ID: 3247 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Finally, limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3248 **Project:** 11759 **Document:** 38106
Received: May,25,2011 15:30:57
Correspondence Type: Web Form
Correspondence: To The National Park Service:

The Golden Gate Nat'l Recreation Area & the rare and endangered species living there are gems that must be protected at all costs. When considering planning for this area, please prioritize habitat above all else. End the allowance for off-leash dog walking, as dogs are too big a threat to the plovers. Also, other than service dogs, dogs should not be allowed in all

areas. There should be some dog-free places where hiking & picnicing can be enjoyed without them. Thank you. Connie Thomas

Correspondence ID: 3249 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I love dogs & other animals but when our domestic activities interfere with our wild friends boundaries need to be drawn to protect the wild ones.

Correspondence ID: 3250 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

While I endorse multi-use park use whenever possible, those issues must be held to a higher standard and scrutiny when endangered species and wildlife habitat are at risk. When you consider that Golden Gate Golden Gate National Recreation Area is perhaps one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

I am a lifelong National Park visitor and have been to dozens of parks across America. While Yellowstone will forever be at the top of my list, Golden Gate offers such a unique opportunity for visitors near a major metropolitan city. However, the proximity of people to this park threaten to "love it to death." Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. If that means that I can't visit the park as often as I'd like, so be it! If it means that I must keep my dog on a leash, not a problem. If that means that the dog must stay home, well, I can't take him to work or to any of the restaurants that I enjoy either. There are dog parks and paths everywhere. There is just one Golden Gate National Recreational Area.

Here is my position: 1. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free

from dog recreation.

2. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

3. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for the opportunity to comment on these important issues.

Correspondence ID: 3251 **Project:** 11759 **Document:** 38106

Received: May,25,2011 15:32:39

Correspondence Type: Web Form

Correspondence: Dear NPS,

Our precious wildlife deserve our protections, but, after reading and email sent to me, I see that much of GGP's wildlife is being harassed by unregulated recreation. Please, I urge you to change this situation before it is too late.

Sincerely, Jesse

Correspondence ID: 3252 **Project:** 11759 **Document:** 38106

Received: May,25,2011 15:33:08

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to impact and undermine it. Alternative D best reflects the national park values. Please help preserve national parks today for all generations to enjoy in the future.

Correspondence ID: 3253 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 3254 **Project:** 11759 **Document:** 38106

Received: May,25,2011 15:33:47

Correspondence Type: Web Form

Correspondence: Not only do off-leash dogs on beaches disturb wildlife, especially nesting birds, they also foul the beaches, annoy those of us just out for a peaceful walk along the shore and generally make noisy, dirty nuisances of themselves. I have always hated dogs, and I don't think I'm the only person on the planet who feels this way about them. They are noisy, dirty, and destructive and should NOT be allowed to run loose on beaches where endangered birds and animals should have precedence over a few people who think it is their "right" to roar around on motor vehicles and/or let their dogs run loose. The only thing worse than a dog is the person who owns it--and most of the dog owners I've had the misfortune to encounter take extreme offense when asked to do something as basic and courteous as keep their mutt out of my garden and/or CLEAN UP AFTER IT!! Yes, the Golden Gate National Recreation Area should fully embrace its goal to maintain the natural and cultural resources there, not allow a few people (with money behind them!) to overrun and ruin it for their own "enjoyment". If there MUST be an area where dogs are allowed off-leash, it needs to be fenced and clearly marked as such--and violators must be fined, since money is the only thing that will get their attention. GENUINE service dogs, such as seeing-eye dogs, dogs for the deaf and those licensed to accompany handicapped and wheelchair-bound people, can be excepted from the off-leash area since they wear a harness or leash and are trained for their jobs. I've seen too many people taking their dogs EVERYWHERE with them (including restaurants and grocery stores--yuck!)with the excuse that "it's a therapy dog". Anyone can go online and get a "therapy dog" vest for their hound, whether or not their animal is registered as such or not. To me, it's just another excuse for dog owners to do whatever they please and to heck with the rest of us...

Correspondence 3255 **Project:** 11759 **Document:** 38106

ID:

Received: May,25,2011 15:34:05

Correspondence Type: Web Form

Type:

Correspondence: Although I do not live close enough to the GGNRA to use it for regular dog walking purposes, I can sympathize with those who do. Living in the city with or without a pet provides emotional challenges on many fronts. The lucky among us who have dogs in their households understand that canines are unique in the animal world with a human bond like no other. It is vital, therefore, that reasonable accommodation be made to provide property exercise for these extended family members, as well as for their human guardians. The key here is reasonable. I believe that the existing GGNRA regulations regarding dog walking meet this criteria. What may be needed is stricter enforcement of dog walking rules and, perhaps, higher fines for non-compliance. Our sometimes over-regulated society should not put an even tighter squeeze on what is truly man's best friend.

Correspondence ID: 3256 **Project:** 11759 **Document:** 38106

ID:

Received: May,25,2011 15:35:08

Correspondence Type: Web Form

Type:

Correspondence: Even though I do not live in that area, I believe it is in the best interest of our wild life, and our citizens, that they be protected from unnecessary noises, dogs and the likes. These creatures have a a hard time surviving in this world and need all the help they can get.

Thank you for allowing me to make my comments.

Correspondence ID: 3257 **Project:** 11759 **Document:** 38106

ID:

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: Greetings,

Please strongly consider protecting the wildlife within Golden Gate Park to the best of your abilities. The park and it's inhabitants are a vital part of California's diverse but struggling ecosystems.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you

Correspondence ID: 3258 **Project:** 11759 **Document:** 38106

Received: May,25,2011 15:36:01

Correspondence Type: Web Form

Correspondence: Golden Gate park's mission is to protect the natural and cultural resources. Alternative D seems to best reflect the national park values. Allowing recreation to undermine the natural and cultural resources is a major mistake.

Golden Gate should accommodate diverse park user groups such as families, horseback riders, and runners. Dogs seem to be a special nuisance and must be kept under control. Dogs should be allowed off-leash in enclosed areas only. This will certainly protect park users, wildlife as well as other on-leash dogs. Obviously the off-leash area should be configured to have little, if any, impact on wildlife and habitats.

Thank you in advance to your careful consideration of these points. We want the Park's resources to be available for our children's children etc.

Correspondence ID: 3259 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I strongly believe that as varied a population of wildlife as is appropriate should be encouraged to inhabit the park system, for the benefit of the wildlife and the citizens, young and old, who do not have the opportunity to observe them in other habitats.

Correspondence ID: 3260 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: How can we seriously consider nature to be a "topic" in our political system, rather than the other way around? Who has the short-sighted view?
Anne Ramis

Correspondence ID: 3261 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00
Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3262 **Project:** 11759 **Document:** 38106

Received: May,25,2011 15:40:17
Correspondence Type: Web Form

Correspondence: As a dog lover and owner, I am writing to urge the Park Service to take stronger actions to control the access of dogs to the Golden Gate National Recreation Area. We dog owners have many places that we can take our dogs that do not threaten or endanger wildlife. We don't have to take them with us when we want to enjoy the GGNRA and its beaches. The future of wildlife is far more important than the enjoyment that dog owners get from having their pets with them. It's time to put a leash on scofflaw dog owners!

Correspondence ID: 3263 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: We are sick of our governments in bed ties with these criminal corporations.You are allowing them to destroy our planet and kill everything in sight.What is it going to take to get you to listen to the american people.A civil War.These criminal corporations cannot save you if they are burned to the ground.Do you f@#@%\$ jobs by the people and for the people.You work for us and you have no constitutional business with these criminal corporations.GOT IT!!!!!!

Correspondence ID: 3264 **Project:** 11759 **Document:** 38106

Received:

May,25,2011 15:42:57

Correspondence Web Form

Type:

Correspondence: Please keep this vital habitat safe for those species who call it home. Please require that all dogs be put on leash in these areas. Better yet, why not create a raised walkway so that people and their dogs may enjoy the area without potentially harming the native wildlife. Thank you.

Correspondence ID: 3265 **Project:** 11759 **Document:** 38106

Received:

May,25,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: Please protect the areas wildlife from harassment and death. And preserve this beautiful land for ourselves and our posterity. Thank you very much.

Correspondence ID: 3266 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: People and their dogs feel so entitled; give wildlife a chance.

Correspondence ID: 3267 **Project:** 11759 **Document:** 38106

Received:

May,25,2011 15:44:30

Correspondence Web Form

Type:

Correspondence: Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

However, the current regulations do not address certain kinds of activities which have been found to disturb wildlife like western snowy plovers and marine mammals.

Part of the intention for the park was to encourage wildlife so that people could see these animals in a natural habitat. Birds and mammals now take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, but this is being hampered by unregulated off-leash dog recreation in these areas which has permitted dogs to harass wildlife and damage habitats.

Unleashed dogs represent the most significant recreational threat to wintering western snowy plovers, an endangered species. Other than in off-leash areas which are fully enclosed to protect park users, wildlife, and other dogs, animals must be on a leash at all time enforced by significant fines to the animals' owners. No exceptions.

The park should provide more facilities free from dog recreation. Dogs should only be permitted in areas where they won't negatively impact sensitive wildlife and habitats, and where they don't impact other user groups from enjoying the beauty of the park.

We need to enforce the park's mission of protecting the natural and cultural resources, and amend regulations for recreational use, best reflected by Alternative D.

Please amend the proposal to provide for a 95%, not 75% compliance rate as outlined. These animals need and deserve our help.

Thank you for your attention to my comments.

Correspondence ID: 3268 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: AS a supporter of the National Parks Conservation Association, I ask you to consider the following points:

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3269 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear National Park Service:

Thank you for this opportunity to comment on the draft EIS for dog management at the GGNRA sites.

Clean Air Now's Board of Directors is concerned with the protection of wildlife and habitat in our national parks. Safe and secure recreation is important for the public's exposure to healthful air, relaxation, and the natural environment. It is the National Parks Service's job to ensure that human activity does not infringe on that critical need in society. All creatures must coexist in balance, and because of this we ask that you implement the EIS's "Alternative D". The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. We are all dog lovers, but we also see the need to properly exercise our dogs without harm to others.

A couple of other points we have in common with other groups:

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

James J. Provenzano President, Clean Air Now

Correspondence ID: 3270 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect the Golden Gate's imperiled wildlife.

Correspondence ID: 3271 **Project:** 11759 **Document:** 38106
Received: May,25,2011 15:51:20
Correspondence Type: Web Form
Correspondence: I urge you to protect the wildlife in and around the park, and to ensure that offleash dogs do not continue to be the greatest peril to the survival of park wildlife. I am a dog lover and "owner" of several companion animals, but I would not think of allowing my dogs free reign in an area that is fragile to begin with. I realize the protection and oversight of these areas may not be a priority in light of current economic realities for the city, but it's imperative, nonetheless. Once gone, these species will not be replaced. Thank you for considering my concerns. And I applaud you for limiting off-road access to these areas as well.

Correspondence ID: 3272 **Project:** 11759 **Document:** 38106
Received: May,25,2011 15:52:59
Correspondence Type: Web Form
Correspondence: It is imperative to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

The compliance rate for the essential level of protection required to do this needs to be at the very least 95%, not 75% as outlined.

Correspondence ID: 3273 **Project:** 11759 **Document:** 38106
Received: May,25,2011 15:54:26
Correspondence Type: Web Form
Correspondence: Please keep in mind the reason for protected land is to protect the animals who live or visit there. As a dog lover and a dog owner, I have no problem

recommending stricter regulations to prevent off-leash behavior that threatens all types of wildlife. Our beloved pets should be a joy not a nuisance!

Correspondence ID: 3274 **Project:** 11759 **Document:** 38106
Received: May,25,2011 15:55:09
Correspondence Type: Web Form
Correspondence: Please protect Golden Gate's imperiled wildlife from harassment by unregulated recreation

Correspondence ID: 3275 **Project:** 11759 **Document:** 38106
Received: May,25,2011 15:56:27
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation, particularly off-leash dogs, to undermine it. I enjoy the park and visit it every time I come to San Fransisco. I feel empasioned that it's beautiful resources be preserved and protected. Thank you.

Correspondence ID: 3276 **Project:** 11759 **Document:** 38106
Received: May,25,2011 15:56:33
Correspondence Type: Web Form
Correspondence: As a hiker in the Region of Golden Gate park space I have witnessed dogs menacing birds and natural wild life often. Although I love dogs somewhat myself, i would like to restrict thoughtless dog owners as well, but that is beyond the point. Please protect the wild animals, birds and plant species in the park and surrounds.

Correspondence ID: 3277 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect the precious wildlife of golden gate park!

Correspondence ID: 3278 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental

U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

Please protect this wonderful resource!

Correspondence ID: 3279 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Any practice or action that does not support the conservation of our natural resources needs to be challenged by the citizenry. Please consider this brief comment to preserve the land any wildlife on the land in our national parks and elsewhere from any harm.

Correspondence ID: 3280 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Do the right thing.

Correspondence ID: 3281 **Project:** 11759 **Document:** 38106
Received: May,25,2011 16:01:07
Correspondence Type: Web Form
Correspondence: Off-leash dog areas strike at the heart of what National Park Service areas are all about. Only 2% of the land in our country is set aside for National Parks and Wilderness Areas. Is it that much to ask that wildlife, at least in these small areas, do not have to worry about any other predators but their natural ones??

If these areas have to exist in any part of any of our NPS areas, please keep them to a bare minimum.

Correspondence ID: 3282 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog

recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you.

Correspondence ID: 3283 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Parks are ours to keep forever not consume them

Correspondence ID: 3284 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Keep Golden Gate National Recreation Area open. Its vital.

Correspondence ID: 3285 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. Alternative D best reflects the national park values.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Correspondence ID: 3286 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am a second generation Californian. I live in Southern California but am a frequent visitor to the Bay Area and have visited the Golden Gate National Recreation Area many times. I agree with the recommendations of the National Parks Conservation Association, quoted below. I believe that the park's prime purpose is to protect natural and cultural resources, not allow recreation to undermine it.

Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs, and limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your consideration of my comments.

Correspondence ID: 3287 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I grew up across the street from Baker's Beach and watched the Golden Gate Bridge being built. Please work towards keeping the Golden Gate and Marin side in tact so that future generations can enjoy the wild life that remains and the beauty of our beaches and forests, which I enjoyed.

Correspondence ID: 3288 **Project:** 11759 **Document:** 38106
Received: May,25,2011 16:07:57
Correspondence Type: Web Form
Correspondence: Given our ever-increasing population, the need for parks where people can enjoy nature without the intrusions of mechanized "toys" and/or blatantly commercial concessions is sure to increase. Let's not do anything to ruin (perhaps permanently) the quality of any of our existing parks.

Correspondence ID: 3289 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: -The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3290 **Project:** 11759 **Document:** 38106
Received: May,25,2011 16:12:53
Correspondence Type: Web Form
Correspondence: Please protect the western snowy plover and other marine mammals from harassment by unleashed dogs running wild in the Golden Gate National Recreation Area.

Correspondence ID: 3291 **Project:** 11759 **Document:** 38106
Received: May,25,2011 16:14:30
Correspondence Type: Web Form
Correspondence: I strongly support protecting our endangered species in the Golden Gate Recreational area, including requiring dogs to be kept on leash. Dogs can be a menace not only to wildlife, but to other dogs and to people, and most dog owners do not have their dog under voice control. It is more appropriate to designate a space for people and their dogs to play together where they don't threaten wildlife and can be avoided by people with a fear of dogs.

I urge you to take all steps necessary to preserve our wildlife. Once gone, they can never be recovered, a permanent loss to all of humanity.

Thank you for consider my views.

Correspondence ID: 3292 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form

Correspondence: It is certainly time that we humans realize that we are the ones who must protect all life on our planet Earth.

Correspondence ID: 3293 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Correspondence ID: 3294 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Correspondence ID: 3295 **Project:** 11759 **Document:** 38106

Received: May,25,2011 16:18:50

Correspondence Type: Web Form

Correspondence: To Whom it May Concern -

It is suggested on many websites I have read that the comments that people submit re. this DEIS and the suggested restrictions to use by off-leash dogs and their owners be positive and constructive. I will attempt to be positive and offer constructive comments, but must state off the bat that it is extremely difficult. I feel that this whole process and its possible results are an affront to basic humanity, to co-existing in an urban environment. The approach of the National Park Service is underhanded and roundabout, with the obvious outcome of banning dogs entirely from these Recreational Areas.

That being said, I am writing today as a parent and dog owner. We go to

Crissy Field pretty much every day of the year, rain or shine. The toddler and the dog run across the field, play on the beach, and on beautiful days romp and wade together in the channel that runs between the "estuary" and the bay. Should the "Proposed Changes" go through (in any permutation), most of that would be taken away from us. It is 100% unreasonable to expect that dogs be kept away from the channel area, barring putting up a fence around the whole area of beach that the channel might possibly meander to. It is my request that NO CHANGES be made to the existing leash laws in the Golden Gate National Recreation Area. The funds that would be put into instituting the proposed changes would be much better spent towards enforcing the random wrong-doer than towards punishing each and every dog owner who has managed to peacefully coexist on these lands for almost 40 years. The Poison Pill clause that has made its way into your document (whereby if there are any transgressions then the leash laws can and will be further restricted) should be removed. Please consider the area in which the NPS is trying to institute these changes. It is one of the most densely populated areas in the country, which is blessed with some beautiful open spaces and coastline. Should the GGNRA areas be made off limits to off-leash dog use, where are the dogs and their owners going to end up? In the cramped, fenced-in dog runs placed sporadically around San Francisco? Talk about setting us up for failure?

It is my fervent hope that our Recreational Areas remain untouched by the NPS's agenda. If the proposed changes do go through, expect us to fight them tooth and nail, possibly re-claiming them from the Federal government if that's what it takes. This whole process has put into play a feeling of ill-will between your organization and the people of the San Francisco Bay Area. Wouldn't you rather we all were able to live and play together peacefully?

Correspondence ID: 3296 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3297 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Why do Americans have to destroy all wildlife? Could we possibly embrace good ethics to protect the wonderful nature that has been given to us? We need to start thinking about the world we will leave our grandchildren. Will the USA just be covered with cement filled cities that grow so huge that they just touch each other in an never-ending field of cement & cars. I can't even believe all the cities I see that put trees last. Doesn't everyone understand that we need oxygen to breathe to live. Besides that just looking at grey cement everywhere is boring/depressing. Please protect all the wildlife as they have a right to live here also.

Correspondence ID: 3298 **Project:** 11759 **Document:** 38106
Received: May,25,2011 16:26:34
Correspondence Type: Web Form
Correspondence: As a frequent user of GGNRA, I urge you to preserve the National Park's mission of protecting natural and cultural resources by not allowing recreation to undermine it. Alternative D best reflects the National Park's values. If changes are to be made, the park should better accommodate diverse user groups such as hikers, bicyclists, and families, by offering more than one trail and more beach areas free from dog recreation. Any off-leash recreation for dogs should be strictly limited to areas where it will not have negative impact on sensitive wildlife and habitats, and such areas should be enclosed to protect park users and wildlife. Thank you for considering these comments.

Correspondence ID: 3299 **Project:** 11759 **Document:** 38106
Received: May,25,2011 16:32:39
Correspondence Type: Web Form
Correspondence: I find the problem of un-leashed dogs most indicative of the GGNRA situation. There are plenty of public beaches and parks where dog owners

can let their dogs free. But, when dogs are allowed run unchecked, only problems can occur. Alternative D provides the best option for managing the GGNRA.

Correspondence ID: 3300 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area's mission is to protect the natural and cultural resources, while not allowing human recreation to undermine the total ecology. Alternative D best reflects the national park values.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3301 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3302 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please do not give in to the pressures by people who want to destroy a place of refuge for all the endangered Species in this great Park.

Correspondence ID: 3303 **Project:** 11759 **Document:** 38106
Received: May,25,2011 16:43:05
Correspondence Type: Web Form
Correspondence: Please do not compromise the lives of the wild birds such as Snowy plovers with the indiscriminate use of the parks by off leash dogs.

If people were truly aware of the lives of the birds that use this area as their home and migration route, I think they would agree not to stress them with off leash dog activity.

Please separate off leash dog areas to keep them from adversely affecting wildlife.

There are many places people can take their pets. Please do not let the GGNRA become compromised by destructive uses of the park by off leash dogs.

Correspondence ID: 3304 **Project:** 11759 **Document:** 38106
Received: May,25,2011 16:46:49
Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 3305 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: When you allow wildlife to be destroyed, you are putting the entire human race in jeopardy of extinction!!

Correspondence ID: 3306 **Project:** 11759 **Document:** 38106
Received: May,25,2011 16:51:22
Correspondence Type: Web Form
Correspondence: The dog people have plenty of places to run their pets. Please protect the endangered and threatened species from the humans and their pets.

Correspondence ID: 3307 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: While I agree that we need "off leash" areas for pets and their owners, there are just some places on our coast that are too fragile for that use. As a pet owner I don't think its a burden to seek those parks where my dogs can have

fun and not disturb the local wildlife. Just as I wouldn't want a party of teenagers right outside my house, we need to protect the ecosystem that supports the coastal wildlife, especially endangered species. I believe you should consider the below alternatives.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Sincerely, Michelle Strange

Correspondence ID: 3308 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Let us save as much of the wildlife and land that we can in the greater Golden Gate area.

Correspondence ID: 3309 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Both my wife and I urge you to act to protect endangered and threatened species which inhabit this park: The Golden Gate National Recreation Area. We support organizations locally, on the state and the national level, too, which keep us posted as to the status of wildlife, etc. We do expect the National Park Service to act on behalf of its citizens who use and supports our parks' systems. We also are volunteers for our local state park: The Auburn State Recreation Area here in Northern California.

Richard & Maria Vielbig

Correspondence ID: 3310 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am 74 years of age and I have lived in this state since age 8. I grew up in San Jose and have always treasured what my state represents. I truly have enjoyed the good life here but I'm not expressing this with money. This state has so much to offer in beauty. San Francisco and its location is more than anyone could ever want. Please protect all of that area in what it represents to me. I also love our beautiful Redwood trees. I will always be a tree hugger. I, as one person, can't salvage what we have left, but I have to depend on organizations, like you, to do it for me. Thank you. Dianne

Correspondence ID: 3311 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Correspondence ID: 3312 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please don't allow the innumerable wildlife species in the San Francisco area become extinct. You are their only chance of survival in these dangerous times.

Correspondence ID: 3313 **Project:** 11759 **Document:** 38106

Received: May,25,2011 17:21:13

Correspondence Type: Web Form

Correspondence: While recreation is important, the park's primary mission should be to protect natural and cultural resources. I support Alternative D.

Habitat for endangered species should be given a higher level of protection

from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Also, while I support dog owners having a place for off-leash time with their pets, this must be done in a way that protects the local wildlife (especially during nesting seasons).

Correspondence ID: 3314 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As a citizen, and biologist, I support the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed by substantial fencing to protect park users, wildlife, and other dogs.

There is no reason to risk the habitat of snowy plovers to off-leash domestic pets, when there are many locations that would not impinge on snowy plover nesting habitat. The Park Service should limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Sveinn E. Olafsson Canyon, CA 94516

Correspondence ID: 3315 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Save GG Wildlife

Correspondence ID: 3316 **Project:** 11759 **Document:** 38106

Received: May,25,2011 17:29:20

Correspondence Type: Web Form

Correspondence: Only Alternative D gives sufficient protection to wildlife. Please insist on standards such that the wild nature of the park is not ruined by recreational uses. I see no need to have dogs anywhere except places specifically set aside for them.

Correspondence ID: 3317 **Project:** 11759 **Document:** 38106

Received: May,25,2011 17:33:25

Correspondence Type: Web Form

Correspondence: The Golden Gate National Recreation Area is one of the most beautiful Parks in our country. It is an icon, unique, wild yet at the doorstep of one of our major cities. And as such it requires regulation recreation to preserve its natural habitat and the the myriad species, some of them endangered, that call it home.

Unfortunately, unregulated recreation is causing damage. Fortunately, we can mitigate against this damage with a few simple rules. There are other recreational areas to drive motorized vehicles and allow dogs to run free.

OPTION D is what I urge you to adopt.

Respectfully Submitted,

Celestine Arndt

Correspondence ID: 3318 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: These little creatures are an integral part of the web of life. They must be protected.

Correspondence ID: 3319 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more

endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

As a concerned citizen and repeat visitor to the area, I would like to point out that the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. For one, you could require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Also, limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for considering my comments.

Correspondence ID: 3320 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Talking Points:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3321 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The Golden Gate Recreational Area is one of those very rare parks that sit in an urban enclave, where endangered species coexists with a major metropolitan environment. While some of the grosser activities, like those of off Road vehicles, there are activities permitted that disrupt the lives and breeding cycles that depend on the park for living and procreating. So protections for the park must include the following:

-The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your attention.

Correspondence ID: 3322 **Project:** 11759 **Document:** 38106

Received: May,25,2011 17:47:29

Correspondence Web Form

Type:

Correspondence: Living on a coast that offers habitat for the western snowy plover and other listed species, we in Half Moon Bay have a responsibility to protect their habitat. And we do; dogs are not permitted on Half Moon Bay State Beach.

Given its mission to protect natural and cultural resources, the National Park Service has an even more compelling reason to protect the habitat of listed species. For that reason, I feel strongly that Alternative D is the right choice for park to adopt as its Dog Management Plan.

I have a dog, and I would love to be able to take her on the beach near my home. But if I walk an extra mile south I can take her to a beach without habitat for listed species. The GGNRA is just a few miles north of here, and I am sure that many residents and visitors experience the same tradeoff. But they have a choice; the western snowy plovers do not.

I understand the value of off-leash recreation areas for dogs. I only ask that such areas be enclosed and located where it will not adversely impact the habitat of endangered, threatened or candidate species. This allows dogs to have an outlet for the exercise and socialization they need, and allows those species (and other park users) to enjoy the park in their own ways that are equally deserving of protection.

It will take a while for the "my dog gets whatever I want it to get" crowd to get used to these limitations, but they will. And as animal lovers, they may also come to appreciate the value of preserving this amazing place for future generations.

Thank you for considering my comments.

Correspondence ID: 3323 **Project:** 11759 **Document:** 38106
Received: May,25,2011 17:48:01
Correspondence Type: Web Form
Correspondence: I support your preferred alternative. Suiting each location to the best match seems to offer the most optimal use for all areas of the park

Correspondence ID: 3324 **Project:** 11759 **Document:** 38106
Received: May,25,2011 17:57:47
Correspondence Type: Web Form
Correspondence: Dear Frank Dean,

I am writing in the hopes that my comments will help sway the decision

towards the alternate plan D or A. I care for dogs, but am all too aware of how destructive they can be to sensitive habitats. My job is to restore habitats in the bay area. Within the areas I work, there are many dog walkers who allow their pets to run around off-leash and off trail. Because of this, many of our native plants we planted are trampled and killed. It is so disheartening to work for over a year growing these precious little native plants, only to have them die because of careless dog owners. I think that dogs on leash in parks without endangered species should be allowed. Those park sites with listed species, should either allow no dogs or only dogs on leash. The difficulty with this however, is that most of the GGNRA is not actively policed by park rangers. Without regular enforcement, people will continue to allow their dogs off-leash. Professional dog walkers should also be heavy regulated, because it is often these groups that do the most damage. I hope that the park will pass a strict plan like A or D so that its natural resources will be protected and the parks can thrive. Thank you!

Correspondence ID: 3325 **Project:** 11759 **Document:** 38106

Received: May,25,2011 18:02:11

Correspondence Type: Web Form

Correspondence: PROTECTING the natural and cultural resources of the area is this park's mission, and the park should not allow recreation to undermine that mission.. Alternative D is what best reflects the national park values.

We think that SENSITIVE HABITAT/ENDANGERED SPECIES IN THE AREA CERTAINLY DESERVES A HIGHER LEVEL OF PROTECTION FROM HUMAN DISTURBANCE than the current 75% compliance rate.

There is a diverse group of people using this park. Runners, horseback riders, families and those with service animals. Offering more than one trail - and areas that are free from dog recreation...and restricting dogs to dog beach areas is a better way to accommodate everyone. Limiting off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats is a necessary step. And off-leash areas should be well signed, and enclosed, for protection of park users, wildlife, and the dogs themselves.

Correspondence ID: 3326 **Project:** 11759 **Document:** 38106

Received: May,25,2011 18:02:58

Correspondence Type: Web Form

Correspondence: I support the preferred options identified for the GGNRA sites.

Correspondence ID: 3327 **Project:** 11759 **Document:** 38106

Received: May,25,2011 18:08:07

Correspondence Web Form

Type:

Correspondence: Hello,

After looking into the argument about dogs on Ocean Beach in respect to the effect it has on the snowy plover. I found that the mass movement of sand in the middle section of ocean beach(near Pacheco),by use of tractors allowed by the Park offices I presume has been more detrimental to the snowy plovers environment than any unleash dog activity.

Obviously human traffic, unleashed dogs do still have an effect on this bird that nests in these dunes and low lying banks of sand, but to hold them solely responsible is and seems very irresponsible by people who should know better. Such people should focus on the greater threats to the snowy plover.

Having dogs on leash on Ocean Beach near the areas of plovers nesting is a sound idea, but to have to leash a dog at all parts of the beach is unacceptable to me as a dog owner. After all this is parks and recreation.

Kindest regards, Wayne Sheridan

Correspondence ID: 3328 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Since the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. My understanding is that the endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. Therefore, the park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. If necessary, you should require that all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3329 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: please act to protect wildlife diversity as it ultimately impacts other species including us on a much larger scale.

Correspondence ID: 3330 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please help to stop the killing of all life.

Correspondence ID: 3331 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am asking that you please consider the total impact that will occur if wildlife preservation is not paramount in your decisions. Darrell Rogers

Correspondence ID: 3332 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: In the interest of preserving flora and fauna of the GGNRA, I respectfully request that NPS consider the following critical points:

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3333 **Project:** 11759 **Document:** 38106
Received: May,25,2011 18:26:11
Correspondence Type: Web Form
Correspondence: I'm a dog lover, but I also understand the value of this very rare area. This

park is set aside to protect natural resources. I think Alternative D is the best solution in light of that. I also question the compliance percentage. 75%? Nope, if my neighbors are quiet only 75% of the night, that means I don't get much sleep. We need to have 95% compliance, and shoot for 100%.

I also feel there should be areas where dogs can't run free. I take care of my elderly mother, and although she likes dogs, it is easy for one to knock her down. I can only imagine how I would feel with a very young child. Dogs should have free-range areas, but so should humans! We need areas where we can take the elderly, handicapped, and very young without the fear of off-leash dogs. The leash-free areas should only be allowed where the dogs will not have negative impacts on wildlife and the habitats of wild birds and animals.

Thank you for reading, Dixie Coutant

Correspondence ID: 3334 **Project:** 11759 **Document:** 38106
Received: May,25,2011 18:32:24
Correspondence Type: Web Form
Correspondence: I am a regular visitor to the Golden Gate National Recreation Area, as well as a park volunteer. I support leash laws and restricted access areas for dogs. The reason we keep these areas protected is so that they can be a natural resource for visitors and wildlife. It is difficult to enjoy the silence and beauty of nature as a visitor -- and to protect wildlife -- when there are so many dogs roaming off-leash and excessive dog waste throughout the parks. So-called "voice control" for dogs has never and will never be an effective option.

Correspondence ID: 3335 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Please require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs, as well as limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3336 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please consider the following: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you, Valerie

Correspondence ID: 3337 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: WHATEVER WILDLIFE IS THERE SHOULD BE PROTECTED.

WE ARE NOTHING IF WE DO NOT PROTECT THE FLORA & THE FAUNA OF THE PLANET..

EVERY LITTLE CREATURE & PLANT GIVES THE BRAIN & HEART JOY.

WHAT ARE WE WITHOUT THESE CREATURES & THESE PLANTS.

Correspondence ID: 3338 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please Save Golden Gate National Recreation Area for Wildlife and

future Generations !

Correspondence ID: 3339 **Project:** 11759 **Document:** 38106

Received: May,25,2011 18:46:09

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 3340 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I have grave concerns about the fungal disease known as white-nose syndrome, which has become an epidemic in the North American bat population. Since 2006, when the disease was first documented in a commercial tourist cave in upstate New York, more than 1 million bats have died, the disease (or fungus associated with it) has spread to 19 states and four Canadian provinces, and several species are at imminent risk of regional or global extinction. The U.S. Fish and Wildlife Service has called white-nose the "most precipitous decline of North American wildlife in recorded history."

The Northern Region of the Forest Service has an opportunity to take emergency measures, through region-wide cave closure on national forest

lands, to forestall or prevent the possible human transmission of white-nose syndrome into the northern Rockies area. I urge you to enact an emergency closure order immediately, as has been done in the Eastern, Southern and Rocky Mountain regions, before white-nose syndrome moves closer -- or worse yet, shows up in a cave or bat roost in the northern Rockies, at which point bats will spread the disease on their own.

Bats provide enormous ecological benefits by eating moths, beetles and other insects whose populations would otherwise go largely unchecked. In the United States, bats prey on prominent agricultural pests like cucumber beetles, stinkbugs and at least two major pests of corn crops. Researchers have estimated that the loss of insect-eating bats in North America could lead to agricultural costs of between \$3.7 billion and \$53 billion per year. Organic farmers will lose a valuable ally in pest management.

Thus far, six North American bat species have been documented as affected by white-nose syndrome; most have declined dramatically in the current range of infection. Another three species have been found with the white-nose fungus on them, but are currently asymptomatic. Bat species diversity is higher in the West than in much of the eastern United States, meaning that an even greater number of species may be at risk if the disease spreads into the western states.

While cave closure will mean that cave recreationists will be inconvenienced, a much greater proportion of the public, including wildlife watchers, hikers, paddlers, campers, farmers and the general public, has a great interest in seeing bats survive and thrive. More importantly, the existence of an entire suite of mammals is at stake, and once bat populations are decimated in the Northern Region, it is doubtful they will ever be restored to their former numbers.

This matter is of great urgency. As a concerned citizen and wildlife enthusiast, I strongly support a region-wide, blanket closure order for caves and mines in the Northern Region. Restrictions should be placed on all nonessential human access, with entry allowed by permit only for critical activities such as research on bats and white-nose syndrome and human safety issues. This closure should be enacted immediately and should be kept in place until more is known about white-nose syndrome and its mode of transmission or until an effective treatment is found.

Thank you.

Correspondence ID: 3341 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Web Form

Type:

Correspondence: It sickens me to hear about our wildlife and domestic animal & marine life being killed, tortured, maimed, driven to extinction all because government and stupid people are greedy, maybe don't like animals, fearful or ignorant.

For those who are misinformed, stupid, arrogant & ignorant, mean bastards and greedy there are only two words you need to remember and follow is EDUCATE YOURSELVES ! However you do this going to the library, researching the internet, talking to park rangers, talking with animal activists or visiting shelters, sanctuaries, preserves or wildlife rescue centers.

Our wildlife everywhere, domestic animals, marine life and desert creatures as well all deserve to be on this earth - as you are. I believe in those who harm our creatures should die or be tortured the very same way . I believe in " an eye for an eye". Abuse an animal - GO TO JAIL WITH NO PAROLE" ! God is an animal lover. He put all our loving, innocent , majestic wildlife& marine life, known as God's Creatures on our earth for a reason... to enjoy, to learn from, to reproduce, to live, to grow, to die from natural causes (like you) - all is part of the natural selection. All creatures on earth are part of the food chain and are important for the environment.

To kill these creatures is going against God's act. I'm not religious but I do believe that you are satan if you disregard him and his actions regarding animals. Beautiful park animals like bears, eagles, raccoons, skunks, wolves, coyotes, snakes and other animals are my friends! For hurting or killing them I hope you rot in hell. Mankind is an enemy to God's animal friends - educate yourself and be a friend. Otherwise your life and your hateful friend's lives are numbered.

Correspondence ID: 3342 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Oftentimes people who want to let their dogs run freely are usually people too lazy to walk their dogs on a leash. Dogs off leash can cause serious harm to dogs on leash and lawsuits can ensue.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3343 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I LOVE snowy plovers.. they are soo cute and delicate. PLEASE DON'T HURT THEM !!! When I see the plovers at the beach (Santa Cruz Ca) I love to sit on the sand or a hunk of driftwood sit back and watch these darling marine birds. Awww, I LOVE THEM !

PLEASE DO NOT DRIVE SNOWY PLOVERS AND ALL OTHER MARINE LIFE, WILDLIFE, DOMESTIC PETS, REPTILES, WHALES,SHARKS,SEALS AND BIRDS INTO EXTINCTION ! PLEASE DON'T KILL OUR CREATURES!..... if you do you need to watch your back !

Correspondence ID: 3344 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered and threatened species in Golden Gate National Recreation Area need greater protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Off-leash recreation should be highly limited to areas where it will not have negative impacts on sensitive wildlife and habitats. All off-leash areas should be enclosed to protect park users, wildlife, and other dogs. The park should offer more than one trail and more beach areas free from dog recreation.

Thank you for helping to protect imperilled species and habitats at Golden Gate National Recreation Area. Sincerely, Diana Fish

Correspondence ID: 3345 **Project:** 11759 **Document:** 38106

Received: May,25,2011 19:10:18

Correspondence Type: Web Form

Correspondence: It is really important to keep dogs away from humans and wild animals. It is especially Important that they not be near children, especially if they are loose on a beach. I know of 3 cases where dogs who normally, according to their owners, were perfectly well behaved. However, 3 small children were bitten, one with a torn face requiring painful surgery and scarred for life.

Please protect humans and wild animals for uncontrolled dogs.

Sherry Bloom

Correspondence ID: 3346 **Project:** 11759 **Document:** 38106

Received: May,25,2011 19:17:11

Correspondence Type: Web Form

Correspondence: This dog policy debate is a sad metaphor for bigger conceptual and political human problems. It's one of those issues where the group that most acutely feels effects in the short term (no matter how insignificant or ultimately manageable) will be making a lot of noise to get their way, but if this handful of dog owners and professional dog walkers win this fight and dogs get to run the park, in the long term we'll all be much worse off.

This is another example of the kind of short term thinking that has been cashing out our ecological diversity everywhere. At some point, I hope we as a people decide to draw a line in the sand, and if not in our National Parks, then where?

Correspondence ID: 3347 **Project:** 11759 **Document:** 38106

Received: May,25,2011 19:18:06

Correspondence Type: Web Form

Correspondence: I appreciate the need for a comprehensive management plan related to dog policies for the GGNRA, but I oppose the recommended GGNRA Draft Dog Management Plan. The Dog Management Plan should continue and formalize the 1979 Pet Policy. A formal policy relating to commercial dog walkers is appropriate. Making areas added to the GGNRA in the future automatically off limits to dogs is inappropriate, knee-jerk legislation. Off leash voice controlled areas should be added, or removed, based on site specific reasons and evidence supporting any proposed change. The proposed plan does not include adequate evidence in support of the

proposed changes.

The plan over restricts pet access to the GGNRA. Off leash access in areas currently designated off leash should only be restricted if there is evidence to support the restriction. Dog visitors should not be treated as park hazards except where there is evidence that they are. I object most strenuously to the proposed rule that would ban dogs in on-leash only areas based on 25% or more non-compliance with leash rules. This is an enforcement problem, not a negative impact issue that would warrant banning dogs, and should be addressed as an enforcement problem. This proposed rule is bad legislation. We do not ban driving on roads where speed limits are routinely not observed. We develop more effective enforcement strategies.

The GGNRA is a unique national park. Unlike any other national park in the nation, it is located in a densely populated area in which there are approximately 6.9 million people, and it spans 3 counties which together have approximately 1.7 million people. Despite its designation as a national park, GGNRA lands serve an urban area, and need to meet the needs of the diverse population that lives in the Bay Area. The GGNRA's urban recreation mandate includes making the park a friendly place for pet owners (and their pets!).

The GGNRA is not a wilderness area. It serves an urban population, and its rules regarding visitors with pets should be responsive to the needs of an urban population. Reducing by approximately 90% the 1% of the GGNRA currently designated off-leash removes an important resource for urban pet owners.

As a resident of San Francisco for the past 32 years, and a dog owner for the past 25 years, I depend on open areas to exercise my dog. I visit the GGNRA every day, sometimes without, but mostly with, my dog. Like most, and perhaps nearly all, San Francisco residents, I don't have a yard in which to exercise my dog. I rely on dog-friendly open areas where I can exercise my dog off leash. Like the vast majority of dog owners, I am a responsible owner: I leash my dog in areas dense with people, in sensitive habitats off limits to pets, and in areas posted on-leash only. I don't let him dig or chase wildlife. I clean up my dog's stool, and even the stool that other, less responsible pet owners, leave behind. My dog needs more exercise than my old legs could ever possibly give him. He needs to run around, chase balls and play with other dogs, and he can't do this on a leash. Dogs that don't socialize off leash with other dogs develop aggressive, anti-social behaviors that make them a nuisance, and can even make them dangerous when they are allowed off leash.

The GGNRA 1979 Pet Policy has served the GGNRA and Bay Area pet owners well for over 40 years. It recognizes that pet owner recreation

includes dogs, and imposes sensible restrictions on pets and their owners. It recognizes that the GGNRA must serve the needs of an urban population. The GGNRA Draft Dog Management Plan / Environmental Impact Statement provides no evidence that the 1979 Pet Policy has had any material adverse impact on wild species or the natural environment in the GGNRA. If dog access is to be severely restricted as proposed, the damage dogs might do to the park in the future must be supported by the damage that they have done in the past. To arbitrarily change these rules and ignore 40 years of data is irresponsible. And if no data was collected during this period to justify the proposed changes, then a period of time should be allowed to collect data relevant to the proposed changes so that the policy is based on good science, not hypothetical future events.

I urge you to be responsible stewards of this important public resource. Decisions that restrict access have adverse consequences for those restricted. The reasons to impose such restrictions should have a sound foundation (hence the requirement for an EIR!). But the GGNRA Draft Dog Management Plan / Environmental Impact Statement is based on pseudo-scientific reasoning, with little or no data to support the recommendations regarding changes to pet access to the park.

Pets under the voice control of their owners are not engaging in predatory behavior, damaging the environment or molesting humans or animals (although pets not under control may indeed be doing these things). They are running around, getting drunk on scents that only noses a thousand times more sensitive than ours can truly appreciate, chasing toys, playing with other dogs, and just enjoying life and giving pleasure to the humans that love them in one of the most beautiful urban parks in the world.

Under the 197- Pet Policy, 99% of the GGNRA is either off limits to dogs or on-leash only. People afraid of dogs or otherwise bothered by the idea of visiting an area where dogs are off-leash have the run of the park without risk of meeting an off-leash canine if they wish to visit. The more you restrict dog access, the more dog-concentrated the remaining dog-friendly areas will be, and the worse the experience will be for both pet owners and non-owners alike.

There are plenty of valid reasons to restrict pet access or require them to be on-leash, and I am not advocating for unfettered access of pets to the GGNRA. Where there is sensitive habitat that could be damaged by foot traffic, they should be on-leash. In areas where ground-nesting birds are nesting, they should be on-leash. On beaches with dangerous surf conditions, they should be on-leash. On beaches that have dense human populations, they should be restricted. In areas with a fragile dune environment or where all foot traffic is restricted to a path, they should be on-leash (if foot traffic is allowed) or restricted (if foot traffic is not

allowed). Some dogs are aggressive, and they impose a danger to both humans and non-humans. They should be on leash, AT ALL TIMES. Do not let the existence of such dogs drive policy for the hundreds of thousands of Bay Area residents that routinely enjoy partaking of recreation in the GGNRA with their pets. Areas reserved for picnicking should be on leash-only. Certain beaches, especially those with critical habitat or high human density should be appropriately off limits to dogs. This is not rocket science. It is merely site-specific common sense and responsible pet ownership.

Please, I encourage you to approach this issue as any responsible pet owner would. If you do, the GGNRA will be preserved for future generations, including those with pets.

Correspondence ID: 3348 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: To Whom It May Concern,

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The Bay Area is a wonderful wildlife area where the majority of the land been built on and destroyed. Protect the limited untouched areas and help restore those damaged in the Golden Gate National Parks. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Jennifer Formoso

Correspondence ID: 3349 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Off leash dogs can be devastating to a wild area. They also can scare or even harm other dogs children and adults. Especially with so many pit bulls

these days people could be seriously hurt or killed. Please do not allow dogs off leash in the park. At least enclose off leash areas.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Thank you.

Correspondence ID: 3350 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I'm writing to urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

I would also like to point out that endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

I feel the park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

In addition, all off-leash areas need to be enclosed to protect park users, wildlife, and other dogs, and limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you very much for your consideration.

Sincerely, Terry Church

Correspondence ID: 3351 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: SAve our parks!

Correspondence ID: 3352 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please do whatever possible to protect Golden Gate's imperiled wildlife

from unregulated recreation.

Correspondence ID: 3353 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The Golden Gate is one of the jewels of our coast and must be maintained for all of us who delight in its wondrous vistas and the creatures that we see. With our population moving and growing it behooves those in charge to be all the more careful. Thank you.

Correspondence ID: 3354 **Project:** 11759 **Document:** 38106
Received: May,25,2011 19:52:25
Correspondence Type: Web Form
Correspondence: I thought it was the law in San Francisco, that dogs must be on a lease. Why can't they be leashed when walking through the Golden Gate National Rec. Area? Will that solve the problem? If not then NO Dogs Allowed, simple as that.

Correspondence ID: 3355 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I support protecting our park and wildlife.

Correspondence ID: 3356 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Keep all npca parks open and secure for wildlife and people. especially the golden gate recreational park.

Correspondence ID: 3357 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3358 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please protect the GGNRA:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your consideration of these items.

Michael Siebrass

Correspondence ID: 3359 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: PROTECT OUR WILDLIFE!!!!!!!

Correspondence ID: 3360 **Project:** 11759 **Document:** 38106
Received: May,25,2011 20:18:25
Correspondence Type: Web Form
Correspondence: GGNRA,

As resident of Fairway Park, and a concerned citizen and responsible dog owner, I am compelled to comment on the ill-conceived preferred dog policy for Mori Point as outlined on your website.

As many of my neighbors, part of my decision on choosing to live in Fairway Park was based on the proximity to open space, now GGNRA, Mori Point. I have walked my dog here on leash for 9 years, collected trash and reported illegal activity on this land to authorities on several occasions. These incidents have included off road vehicles and a dog attack by an uncontrolled, off leash dog. As encouraged by multiple GGNRA signs, I consider myself a steward of this land and most of my neighbors act in the same way. Fairway Park, by my most recent estimate, includes more than 40 dog owners many of whom frequently use Mori Point to walk their dogs. Unfortunately, I now feel my use of this space is threatened by a preferred policy which restricts on leash dogs to 2 trails passing through the space only. This policy is very confusing based on the environmental reviews on your website which state little to no impact on habitat by leashed dogs. Further confusing this preferred policy is the fact that trails which allow dogs on leash are all within 100-200 feet of trails which prohibit dogs even though they share the same watersheds and natural features.

Mori Point is bordered by the old quarry, Fairway Park neighborhood, Sharp Park Golf Course and beach promenade making it a multi-use recreational area, not a wilderness area. Restricting leashed dogs within Mori Point will likely not be well-accepted, making the regulation a difficult one to enforce. The enforcement plan of going to even more restrictive policy based on compliance rate of less than 75% is backward. If a regulation is not acceptable to a large percentage of people using the space, it is the regulation, not the people who are misguided. If dog policy is seen as inappropriate by many users, the land and habitat could be further damaged by people using the space during off hours.

I trust the GGNRA will take the above into thoughtful consideration when developing dog policy. I look forward to many more years of using this space with my dog and continuing to work with GGNRA to make this a safe place for people and animals while continuing to protect the habitat as all of these are possible.

Sincerely, Julie Ulmer

Correspondence ID: 3361 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3362 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Save the Wildlife in Golden Gate Park

Correspondence ID: 3363 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Protecting our environment should be #1 on all agendas. This economy, our lives and even this country and its agendas for money & power is felting. And so dependent is our future on the success of our long term policies and views to live in harmony with this planet and all living things on it.

Correspondence ID: 3364 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: 5/25/11 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to honor the original 1979 Pet Policy, respect dog-walking as legitimate recreation, provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Also exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I go to Fort Funston and Land's End regularly with friends, dog, or both. It's such a joy and really contributes in a special way to the quality of life in the Bay Area. I people being pretty respectful stewards of the land and there is also plenty of land that is left wild. Please keep off leash dog walking intact.

Sincerely, Amad Demetrious

Correspondence ID: 3365 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into

consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 3366 **Project:** 11759 **Document:** 38106
Received: May,25,2011 20:43:04
Correspondence Type: Web Form
Correspondence: Please help to maintain the wildlife in the GGRNA. Once the wildlife is gone it is forever. Humans need spacw with wildlife, plants, trees and plants for good health. I lived in the bay area for fifty years and really appreciate how wonderful the native life is. Plese be sensible when handling the dog situation thank you, Louise Le Cam

Correspondence ID: 3367 **Project:** 11759 **Document:** 38106
Received: May,25,2011 20:58:48
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 3368 **Project:** 11759 **Document:** 38106

Received: May,25,2011 21:00:10

Correspondence Type: Web Form

Correspondence: My particular area of concern is Muir Beach and the protection of Natural Resources in that area without the restriction of some 'dog time' on this local beach. The Muir Beach and surrounding communities use the local trails and beach as their back yard. I personally know of an Ocean Rider member who takes her dogs to the beach every morning for exercise, but spends time with another MB resident cleaning up the trash from the visitors. The responsible dog owners should not be punished for those who are not. We realize that funds are limited for education and enforcement but I feel the dog community needs to participate in self-regulation. THE number one concern is to protect the natural resources which I feel can be done with proper fencing along the dunes and RWC outlet to allow wild life to move freely but to keep the dogs out of the Redwood Creek to Muir Beach. Dogs should NOT be allowed off-leash until they reach the beach and MUST be voice control. Possibly there is a way to have special collars or permits that prove a dog owner has passed a test.

Doggie stations need to be at the bridge entrance for doggie-do collection and disposal. Possibly there can be 'doggie hours'... when it is okay to use the beach. So those uncomfortable with dogs know they can go without the dogs at different hours or days; or weekends.

Horses and dogs have both played a crucial role as 'partners' with humans for centuries. There is a sense of safety that many (especially woman) feel if they tend to hike alone as long as their dog is with them. For years I rode the trails.. just me, my horse, my dog. I had had far less anxiety in those days

than I do now sharing the trails with mountain bikers. While I no longer own a dog due to the increased restrictions, I would hate to see dogs lose their right to enjoy this local beach, and some trail loops. I know how much it has meant to me in past years.

Correspondence ID: 3369 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Althhernative D best reflects the national park values. I believe that the compliance rate should be 95%. I also think that the park should limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3370 **Project:** 11759 **Document:** 38106
Received: May,25,2011 21:14:55
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Phil Raider

Correspondence ID: 3371 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please do not close this unique park that provides such a diversity of wildlife experiences to so many people.

Correspondence ID: 3372 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I urge you to protect the wildlife in this new park.

Correspondence ID: 3373 **Project:** 11759 **Document:** 38106
Received: May,25,2011 21:25:13
Correspondence Type: Web Form
Correspondence: Dear NPS Representative,

I support any action the NPS can take to lessen the presence of unleashed dogs within the boundaries of GGNRA. I have been attacked by dogs twice in the past and when I see dogs unleashed it causes apprehension as I am walking along the trail. In fact, if I see an unleashed dog I usually walk the other way or stand to the side as the animal passes. So, my first reason for requesting a ban on all unleashed dogs from the park is the negative impact that unleashed dogs have on people, diminishing our ability to enjoy the trails of GGNRA. As one of the goals of the Park Service is to promote the enjoyment of our national parks, the presence of unleashed dogs prevents enjoyment for a significant number of people.

My second reason for opposition to unleashed dogs is the impact on wildlife, especially species that are on the endangered species list. While most dogs don't stray into areas where endangered species are located, there is enough of an impact from straying dogs that scientists have determined that there is a negative impact. We cannot allow a "tragedy of the commons" in GGNRA by allowing large numbers of people to unleash their dogs. It is simply not a good idea.

If the NPS determines that some accomodation must be made to the dog owners, then I hope that unleashed dops will ONLY be allowed in areas with high fences that prevent the dogs from straying into sensitive habitats.

Lastly, those who violate the rules should be fined in a way that makes it clear that the NPS is seroius about protecting the resources of GGNRA. In other words, a stiff fine would be appropriate.

Thanks for the opportunity to comment.

Sincerely,

Ron Sundergill

Correspondence ID: 3374 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: It's simple: as a native of the Bay Area this area should always be protected.

Correspondence ID: 3375 **Project:** 11759 **Document:** 38106
Received: May,25,2011 21:34:18
Correspondence Type: Web Form
Correspondence: Park Service

I believe that the Park Service is charged with the protection of wildlife as well as the natural beauty of our nation's parks. The San Francisco beach area is the home of the endangered Plover. Curtailing free running dogs and motor vehicles is reasonable and necessary for this protection. Leash enforcement and controled paths are efforts that should be employed for the protection of this area. David Eisbach

Correspondence ID: 3376 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by

either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely, Sharon Reichardt

| | | | |
|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 3377 | Project: 11759 | Document: 38106 |
| Received: | May,25,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D, the most protective, best reflects the national park values. | | |

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be much greater than

the 75% outlined in the proposal.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Off-leash areas should be enclosed to protect park users, wildlife, and other dogs, and limited to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3378 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. I believe it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- * Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.
- * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- * Exclude speculative, exaggerated, biased, or misleading statements and studies.
- * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- * Enable professional dog walking and align any professional dog walking rules with

county or city regulations. * Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I'm a mother of a toddler and a dog owner, and it is difficult to find places to go where I can bring both my son and my dog. Playgrounds, for example, are dog-free. But as a city-dweller with no backyard, I need to exercise my dog - as well as be active with my family. We frequently spend our weekend days at Fort Funston and Chrissy Field, where both my son and my dog can run and enjoy the outdoors. If dogs are no longer allowed in these locations, or if their presence is severely restricted (as I believe your plan aims to do) the result will be that my family and I simply won't visit as often. What a shame! These two parks are beautiful outdoor areas that I want my son to be able to grow up visiting.

Thank you, Elizabeth Browne

Sincerely,

Correspondence ID: 3379 **Project:** 11759 **Document:** 38106
Received: May,25,2011 21:47:47
Correspondence Type: Web Form
Correspondence: Snowy plovers and other wildlife on beaches are endangered by unleashed dogs. Please restrict dogs access to areas where the plovers are nesting.

Correspondence ID: 3380 **Project:** 11759 **Document:** 38106
Received: May,25,2011 22:01:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean:

I am writing to oppose the GGNRA's draft dog management plan. This violates San Francisco and the Bay Area dog friendly protocol. One percent of the GGNRA areas are assessable to dogs and their owners. Dog owners are a large part of the support and funding for these recreational areas.

As a dog owner and environmentalist, I take great care in cleaning up after my dogs. I do not let them chase after wildlife. My dogs enjoy walking especially on the beaches off leash. They are on voice command and have

never hurt another being or wild animal.

I believe the GGNRA needs to address issues such as pollution and providing permits for dog walkers. If you really look at the affect on the environment, it is humans that cause the greatest damage. After a sunny day, the beaches are loaded with trash. Each day I walk with my dogs, I make it a habit to pick up some sort of plastic garbage left by a human. If the GGNRA fined people for littering the beaches and park open spaces they would find that most of the culprits are non dog walkers.

I also believe if the GGNRA required permits for dog walkers allowing no more than six dogs per walk, it would also cut down on the negative complaints.

Your plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan is not a practical plan as the city of San Francisco Supervisors have stated their view in vote. The city parks will be overloaded with dogs causing much distress to the city of San Francisco.

Sincerely, Antonia Sousa

Correspondence ID: 3381 **Project:** 11759 **Document:** 38106
Received: May,25,2011 22:01:35
Correspondence Type: Web Form
Correspondence: Dear National Park Service,

For more than 20 years, I worked at a wildlife rehabilitation facility under a Memorandum of Understanding with the California Department of Fish and Game, which required annual training that augmented my veterinary technician experience. I worked to save oiled birds, to rehab and release raptors, waterfowl, and many native mammals that are part of our fragile ecosystem. They were, after all, here before we humans.

I have seen, firsthand, how habitat destruction, development, public recreation activities, and human ignorance have impacted California's wildlife. In the Palo Alto area, for example, the California quail and burrowing owl populations have seen a severe decline. I was a shelter team leader when the driver of an off-road vehicle found and transported a desert tortoise to our shelter. It could not be re-released.

There are many many stories that I could relate to you of the negative impact I've seen from human encounters with native wildlife. It is our

collective job to protect these precious resources, and yours specifically.

I urge you, therefore, to severely curtail human activity, which includes domestic dogs, horses, and off-road vehicles in the Golden Gate National Recreation Area. Compliance should be 95%, not less. The public does not have a right to spoil sensitive habitats or the wildlife species that live there. Those resources are ours to protect. As a taxpayer and environmentalist, I urge you to do more to protect it from human disturbance.

Thank you,

Correspondence ID: 3382 **Project:** 11759 **Document:** 38106

Received: May,25,2011 22:02:28

Correspondence Type: Web Form

Correspondence: Hello, I would like to share my comments on the off-leash policy. I am a dog owner and love to let my dogs run when I can, but only in responsible areas. Dogs should not be allowed access to harass wild life. This is the policy at Pt. Reyes National park for example and it is a great rule. The park is calm, beautiful and clean from pet messes. Pets are allowed in designated areas only. Dogs should have restricted off-leash areas or a dog park that protect them from wild life and more importantly the wild life from them. In addition, pet owners often ignore their pet's behavior and messes in public areas. I speak from experience here. Wild life and dogs don't mix. The primary goal should be to protect wildlife and this can be accomplished very simply with a dog park area.

Thank you for considering my comments. Sincerely, Kathleen Martin

Correspondence ID: 3383 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please protect our wildlife.

Correspondence ID: 3384 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3385 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: This ecosystem is very fragile and needs to be protected.

Correspondence ID: 3386 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: SAVE OUR NATIONAL PARKS!

Correspondence ID: 3387 **Project:** 11759 **Document:** 38106
Received: May,25,2011 22:36:20
Correspondence Type: Web Form
Correspondence: Hi, it seems pretty incredible to me that people who want all dog off leash area to be enclosed, are also advocacy for horseback riding. While I agree certain area should be off limit to dogs, in my past experience, dogs on the beach are far less disturbing to both human and habitat alike than horses. If the concern is truly that of habitat lost and impacts on family use, horseback riding should really be banned in urban recreational areas.

Enforcement of leash law should be tighter in protected areas but, not to remove off leash areas for dogs on the beach.

Correspondence ID: 3388 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please make and enforce a strict leash law in GGNP; the park's mission is to protect the natural and cultural resources, not allow recreation to disturb it.

Alternative D best reflects the national park values.

Our park harbors more Endangered species than do several of our biggest National Parks combined! And you are charged with the mission to protect!

Endangered species wildlife habitat deserve protection from human disturbance; the compliance rate should be 99%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require any off-leash areas (if ill-advised allowance is granted) to be enclosed in an effort to protect park users, wildlife, and other dogs.

-NO AREAS CAN BE PROTECTED IF DOGS ARE OFF-LEASH! It is a no-brainer to prevent destruction (euphemistically called 'negative impact') in ALL park areas; our sensitive wildlife and their habitat must not be sacrificed and lost to irresponsible dog owners whose pets run rough-shod over the land and our native and beleaguered wildlife.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 3389 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs and limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3390 **Project:** 11759 **Document:** 38106

Received: May,25,2011 23:05:43

Correspondence Type: Web Form

Correspondence: As a docent in an Urban National Park (Franklin Canyon - Santa Monica Mountain National Recreation Area), I can can tell you from experience that dogs off-leash, represent a real threat to wildlife and to other park users. Even when there is an on-leash rule, there is still a problem as it is often ignored, but it is still a significant deterrent.

Correspondence ID: 3391 **Project:** 11759 **Document:** 38106

Received: May,25,2011 23:19:50

Correspondence Type: Web Form

Correspondence: my main concern is for the endangered snowy plover's habitat on the GGNRA's beaches as it winters in the same areas that many dog walkers allow their dogs to run off leash and damage the plover's nests....last i checked, the american canine is nowhere near being endangered. i encourage the NPS to reign in the owners of all dogs on the GGNRA beaches - and make a plan that mandates dogs be on leashes at all times - not only for the safety of the birds, but for the rest of us who don't care to be approached by a strange, unleashed dog when we are enjoying our peace and quiet in the GGNRA. thank you for your consideration, and, by the way, i am a dog owner who is aware of the responsibility i have to keep my dog from disturbing any wildlife habitat.

Correspondence ID: 3392 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I love dogs. I would urge the NPS to develop and implement Alternative D because it best reflects the national park values. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3393 **Project:** 11759 **Document:** 38106

Received: May,25,2011 23:26:08

Correspondence Type: Web Form

Correspondence: I am an avid hiker and the owner of two very nice 60-lb. mutts. I love to hike in places where I can let the dogs run off-leash. But much as I love off-

leash areas, conservation of threatened species and other wildlife comes first. Please make sure that all threatened species, especially ground-nesting birds, are protected in the final version of the plan--and don't listen to selfish dog-owners who have forgotten that they and their pets need to share the parks with a lot of other species. Thank you.

Correspondence ID: 3394 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate's imperiled wildlife must be protected from harassment by unregulated recreation. Specifically:

A--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

B--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

C--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

D--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

E--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3395 **Project:** 11759 **Document:** 38106

Received: May,25,2011 23:37:05

Correspondence Type: Web Form

Correspondence: I would like to express my support for Alternative A, with site-specific, monitoring-based analysis on any new land additions to the GGNRA. It only makes sense to evaluate each site when deciding whether and in what capacity to allow dogs. It saddens me to see how hostile the tone of the entire DEIS/Dog management plan document is toward dogs and their handlers. All too often management seems to conveniently forget that GGNRA has the word " Recreation" in it - and recreation includes dogs for a whole lot of people! The GGNRA sites are mostly located close to densely populated areas, and the reason most of them even exist is that at some point

a trusting individual or family donated land to an organization such as POST, thinking that this would preserve the open space for all to enjoy. Unfortunately, all too often that land then gets locked away from public use and even when it's re-opened, the restrictions are often severe. I understand it is important to restore sensitive habitats for wildlife etc, but areas that have been used by people for decades, should remain accessible by all, at least for the most part. And "ALL" includes dog owners, just like "ALL TAXPAYERS" include dog owners. thank you for your attention Tanya Rebarchik

Correspondence ID: 3396 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Continue to work towards saving life on earth in all its forms. Doing otherwise is bowing to the corporate will and power.

Correspondence ID: 3397 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect the wildlife. We have been giving the responsibility to protect the planet. Let's do it

Correspondence ID: 3398 **Project:** 11759 **Document:** 38106
Received: May,25,2011 23:59:25
Correspondence Type: Web Form
Correspondence: Energy is very important to this small bird. Every time humans, dogs, or other predators cause the birds to take flight or run away, they lose precious energy that is needed to maintain their nests. Often, when a Plover parent is disturbed, it will abandon its nest, which increases the chance of a predator finding the eggs, sand blowing over and covering the nest, or the eggs getting cold. This can decrease the number of chicks that hatch in a particular year. Did you know that a kite flying overhead looks like a predator to a plover? A kite over a nesting area can keep an adult off the nest for long periods of time.

The western snowy plover has been living on the Pacific Coast for thousands of years, but was listed by the federal government as threatened in 1993, due to low population and decreased habitat.

Every time humans, dogs, or other predators cause the birds to take flight or

run away, they lose precious energy that is needed to maintain their nests. Often, when a Plover parent is disturbed, it will abandon its nest, which increases the chance of a predator finding the eggs, sand blowing over and covering the nest, or the eggs getting cold. This can decrease the number of chicks that hatch in a particular year.

Remember that when a species goes extinct, it is gone forever! We are privileged to be able to be stewards of the beach, its habitat, and its occupants, including the western snowy plover.

People should be able to recreate on the beaches AND there should be room for plovers to nest too. The idea is to "Share the Shore." This means having fun while protecting our natural environment at the same time

Correspondence ID: 3399 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error". I believe that my dog and me should be afforded the same rights as any other taxpaying, law-abiding citizen. This includes full, complete and equal use of the public facilities that my tax dollars support. driver's licenses are not denied to all because some drivers cause accidents. We dog owners should

no longer be made to feel like criminals in our own community, simply for trying to maximize the health, happiness and longevity of our family pets through exercise and socialization. Public parks belong to all of us, and all users should be able to share the benefits of these open spaces in a mutually respectful manner." de-criminalize a recreational activity that brings many neighbors together. Dog owners are taxpayers too. As a responsible dog owner myself, I value the time I spend with other dog owners, and enjoy that sense of community. A leash rule may be an easy answer but it is far from fair or right. The nature of the experience with the dogs off-leash - in which we are letting the dogs socialize, run, play, etc. - fosters a type of camaraderie that is increasingly rare in today's society, and it would be a great loss to our community were it to become unavailable. A small minority of owners may not be as responsible as they need to be, but to deny all dogs the opportunity to run free is unconscionable. They simply cannot get enough exercise if they are always leashed. When the rights of some are restricted, it is called discrimination. How can it be that a few people can disallow the many access to a public space and restrict their freedom? When one space becomes restricted what's to stop the spread of restriction? I am angry over how discriminated against we dog owners are. What other group is consistently labeled by the actions of a few? We are degraded to "those dog people" as soon as we wish to have off leash areas and/or times to enjoy with our dogs. What other group loses their privileges just from the actions of a few bad ones? People speed, but not everyone else gets a ticket. Drunk drivers can lose their license, but not all drunks are forbidden to drive. The way we are treated if applied to every aspect of society would be say if some young males went on a killing spree, then every male of that age would be confined from the public. Yet people say I know most of you dog owners are good responsible people with well trained behaving dogs, but you lose because of the actions of a few bad ones. This type of discrimination is totally not tolerated in any other area of of our lives. We dog owners are expected to "police" other dog owners in order to maintain what privileges we do have. Not only are we expected to keep our dogs behaving, and clean up after them, we are suppose to make sure other dog people we don't even know do same. This includes protecting sensitive habitats, that most of us have supported saving to start with. Sure would be nice if people with unruly kids were under other parents peer pressure to make their kids behave. Do other drivers have to do that when driving? Do people shopping have to keep other shoppers behaving? The thing is we do. We are the most self policing group out on a public beach or hiking area. I would like to see discussed is having more areas to take dogs to instead of less. I am not talking dog parks. I am talking about enjoying a long walk with my best friends, playing on beaches, enjoying the same rights of every other citizen. When a area is the only option for miles around it becomes overused and impacted. Then it is held up as a example of what dogs do to the environment. Where common sense would say if people had more choices in every area then those places would not be overused as people would then

be spread out with their dogs. It is the same as putting only two public parks in San Francisco and then saying how overcrowded and overused they are. Or saying people could only go to Baker Beach. Then forbidding people on beaches because of overuse! To me, it isn't even about the dogs so much as is about people being able to have some basic freedom to enjoy their dogs outside. When there is a leash law everywhere it isn't just leashing the dog, because at the other end of the leash is a person. We respect the environment, but it we need to have our areas too. It seems we are being totally discounted and will soon have no place to play freely. Just in fenced parks. This is not healthy for people let alone for dogs. I feel we have very few areas left and those are being taken. Especially in urban areas, we need our open space too. Are we people not as important? People need some place to just be unleashed as well. More and more laws and rules are being placed upon everyone. This takes away from a healthy mental state of mind. We need places to just walk, and play, without some law being broken just because we are there!

Correspondence ID: 3400 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:16:44
Correspondence Type: Web Form
Correspondence: Humans, when left alone, tend to desecrate their environment for their own use or pleasure. When this happens in your bailiwick, you need to stop it, which you are not presently contemplating. Please review your abstention policies.

Correspondence ID: 3401 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:37:31
Correspondence Type: Web Form
Correspondence: I support the GGNRA 'Alternative' D, the most restrictive option.

Correspondence ID: 3402 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in

both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- ? Honor the original 1979 Pet Policy.
- ? Respect dog-walking as legitimate recreation.
- ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- ? Exclude speculative, exaggerated, biased, or misleading statements and studies.
- ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- ? Enable professional dog walking and align any professional dog walking rules with county or city regulations.
- ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: The community building such urban recreation areas creates for local pet owners is paramount in upholding the 1979 pet policy. Dogs are our family members and more people than ever have pet companions; this is a trend which is not going away and will only continue to grow. To attempt to restrict access and ignore the reality of society is akin to unsuccessful policies such as Prohibition. And as such, the health of human and canine family depends on access to walking areas. Moreover, the community who uses these areas is largely conscientious and well-educated about the impact they and their canine companions have. Most of us only use a small portion of the GGRNA as it is. Until I had a dog, I never even visited Fort Funston. It is fantastic. If you have ever walked a dog there, you will have met and talked to so many kind people. I can't believe anyone would complain about pets visiting the small portions of the GGRNA that they do. Pet owners are by and large compassionate, compliant, and responsible. Do not penalize us for the wrong-headed approach of a few who are misguided. Our dogs can't vote, but we vote for them. Sincerely, Lynne Robertson & Cali San Francisco, CA 94117

Correspondence ID: 3403 **Project:** 11759 **Document:** 38106
Received: May,26,2011 01:05:59
Correspondence Type: Web Form
Correspondence: As a frequent GGR park user and constant Bay Area park lover, I urge you to limit the reach of dogs in the Golden Gate Rec area. These sensitive near-

wild places are so rare and precious now; wildlife need to be the utmost priority. I am also a dog owner but I object to any off-leash allowances in our over-crowded, well-used open spaces. Please deny dog access to ANY place where they may endanger the wildlife. Thank you for listening.

Correspondence ID: 3404 **Project:** 11759 **Document:** 38106
Received: May,26,2011 01:43:03
Correspondence Type: Web Form
Correspondence: Oakland, CA 94611

May 24, 2011

Frank Dean, Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123

Dear Superintendent Dean:

I am writing concerning the proposed Dog Management Plan.

I urge the GGNRA to adopt the policies for each site that would be most protective of natural resources and wildlife, especially endangered or threatened species. I believe the top concern for national parks should be preservation of the environment and of wildlife.

I also am concerned about the many times I have been approached, touched, or jumped on, whether playfully or aggressively, by off-leash dogs in some areas, especially Crissy Field. Off-leash dogs represent some amount of injury that is just waiting to happen. I would prefer that leashes be required in all of Crissy Field, but if off-leash areas are permitted, I believe they should be fenced. It is plain that neither dogs nor many of their owners or walkers will voluntarily obey leash laws at Crissy Field. Furthermore, the Park Service should vigorously enforce full compliance, not just compliance at a 75 percent level.

Thank you for considering my views.

Sincerely,

Charles S. Klein Resident of Oakland, user of GGNRA

Correspondence ID: 3405 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please protect SF's wildlife!

Correspondence ID: 3406 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Save the Golden Gate environment

Correspondence ID: 3407 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Talking Points:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3408 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence:

The park's mission is to protect the natural and cultural resources and offer human a place to think, rejuvenate and redeem from nature. At the least, this is not a place for human entertainment activities. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. We must put maximum guard against displacing wildlife habitat, and control our agnostic nature. Thanks.

Correspondence ID: 3409 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, mountain bike riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3410 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am a wildlife rehabilitator, and regularly witness the devastation to wildlife caused by human activity. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Please limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you for your consideration.

Correspondence ID: 3411 **Project:** 11759 **Document:** 38106

Received: May,26,2011 07:17:33
Correspondence Type: Web Form
Correspondence: Wildlife's right to survival must trump human's right to witness it!!!

\$5,000 dollar fine and 6 months jail mandatory minimum sentence for any unleashed animal. No plea bargain or suspended sentences.

Algerian Ivy eradication needed. Non-native ice-plant removed and replaced with native species.

Oil industry 50% tax on profits over 1 billion a quarter,use the monies to fund quarantine of all public lands from commercial development including cattle and livestock.

Native species have right of way when it comes to wind, solar, geothermal, wave, and and all energy production.

Correspondence ID: 3412 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3413 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Thank you for allowing me to voice my concerns about the GGNRA Draft Dog Management Plan / Environmental Impact Statement. Although I love dogs and se the need for a place where they can be "dogs", it is my understanding that the park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined. The park must also look at and accomodate a wide range of park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

The plan must require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. And it must carefully select off-leash areas where they will not have negative impacts on sensitive wildlife and habitats.

Respectfully submitted, Jenny Wilder, Apple Valley, CA 92308

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|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 3414 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 07:48:51 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. | | |

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| Correspondence ID: | 3415 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. I visited and loved walking in the open space with all the dogs running free. It made the visit more enjoyable. | | |

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| Correspondence ID: | 3416 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. When visiting my daughter in California I enjoyed the time we spent in the open space with her dog. I never once felt afraid. | | |

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| Correspondence ID: | 3417 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. I visited | | |

and loved walking in the open space with all the dogs running free. It made the visit more enjoyable.

Correspondence ID: 3418 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Endangered species wildlife habitat deserves the highest level of protection from human and pet disturbance. Other national parks do not allow dogs to be off-leash and all beach areas should be free from dog recreation to protect birds. If the final plan includes off-leash areas, which I do not believe it should, they should be enclosed to protect park users, wildlife, and other dogs. GGNRA is on the Pacific flyway and exhausted and hungry birds need this sanctuary. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it.

Correspondence ID: 3419 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: As with the entire National Park system, the Golden Gate Park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. By supporting 'Alternative D,' we best reflect our national park values. Wishing to extend the lives of many species, protection from both humans and domesticated untethered animals seems like a good solution. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. More successful accommodations to those diverse park user groups, such as runners, horseback riders, families, and those with service animals, would be by offering more than one trail and more beach areas free from dog recreation. Please support limiting off-leash recreation. By fencing in a specific area for off-leash free running - an area not critical to wildlife habitat - this compromise will both fulfill the Park system's mission and allowing wildlife protection. Thank you for improving our parks. Our family has been richly blessed by having these places throughout the country available to us. We hope the parks continue to be as well maintained so they can be cherished by our children's children as well.

Correspondence ID: 3420 **Project:** 11759 **Document:** 38106
Received: May,26,2011 09:01:42
Correspondence Type: Web Form
Correspondence: Dog parks in California are popular and needed as healthy outlets for dog

energy. However, in my view, they need to be carefully selected. At times, image or territory on the map does not give information about the true needs of the environment in those places. At Golden Gate area, so close to major city and harbor, having a park of National Park stature is a fragile treasure. It does not seem to be appropriate towards utilization by even beloved household pets. In every dog park I have ever seen, greenery gets nearly destroyed and birds and animals devastated.... adorned by leftovers of pets' excrement. I am not familiar enough with the Golden Gate area, but I suggest seriously that it should be protected for all nature's living there without fear and struggle, thus remain recreational for the body, mind and spirit as only the undisturbed parks render.

Correspondence ID: 3421 **Project:** 11759 **Document:** 38106

Received: May,26,2011 09:04:32

Correspondence Type: Web Form

Correspondence: The GGNRA is a designated National Recreation Area, not a national park. If an estimated 15-25% of San Franciscans own dogs, this plan ignores their needs and desires and creates an overload at the few legal, off-leash parks remaining. Dogs need large off-leash spaces to romp as they spend most of their lives in homes and on leashed walks. I am grateful to live near Pt. Isabel dog park in the East Bay, but as leash restrictions tighten in other places even Pt. Isabel is impossibly crowded on weekends.

We who own dogs love being out in nature with our dogs, enjoying watching them stroll or romp around. We are also generally educated and vocal about the needs of our dogs. I find it hard to believe that the GGNRA is not finding ways to designate large off-leash areas in the new plan, as has successfully happened in communities such as Seattle and Denver. People will take their dogs off-leash anyhow; better it be in a designated area than in an area with endangered critters and no supervision.

Ruth Brewer

Correspondence ID: 3422 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3423 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: To Whom it May Concern:

This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error."

Sincerely, Natalie

Correspondence 3424 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 09:37:04

Correspondence Type: Web Form

Type:

Correspondence: National parks are very important to the public. That does not mean free access to those who take advantage of the fact. Wildlife comes first, they need protection. Off leash dogs should not be allowed. If wildlife uses these areas to breed and raise young - then these areas mean protection for them comes first! Hopefully that will be accomplished.

Correspondence ID: 3425 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: The protection of our natural resources is incredibly important and irriplacable. More needs to be done not less and I support protection and oversight of what we have left to us.

Winifred Medin

Correspondence ID: 3426 **Project:** 11759 **Document:** 38106

Received: May,26,2011 09:47:28

Correspondence Type: Web Form

Correspondence: I support Alternate A first and Alternate B second.

Correspondence ID: 3427 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: May 26, 20111

Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing to you to voice my opposition to the GGNRA's draft dog management plan. I believe the GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft

management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

1. Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.
2. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
3. Exclude speculative, exaggerated, biased, or misleading statements and studies.
4. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
5. Enable professional dog walking and align any professional dog walking rules with county or city regulations.
6. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

On a more personal note, I routinely walk my dog at Crissy Field and have never encountered a single negative incident. I consistently encounter responsible pet owners who supervise their dogs vigilantly, pick up after their dogs, and have excellent voice control over their dogs. Dog walking at Crissy Field have given both me and my dog wonderful social experiences and is without a doubt one of the best parts of living in San Francisco. My dog is my family and taking away the GGNRA off-leash areas would be akin to taking away all the playgrounds from those who have children. I sincerely urge you to honor the original 1979 pet policy and continue to provide bay area dog owners with the extensive off-leash and on-leash dog areas that we have enjoyed responsibly for years.

Sincerely, Melanie Fitzgerald San Francisco, CA 94110

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|-----------------------------|--|-----------------|-------|------------------|-------|
| Correspondence ID: | 3428 | Project: | 11759 | Document: | 38106 |
| Received: | May,26,2011 00:00:00 | | | | |
| Correspondence Type: | Web Form | | | | |
| Correspondence: | Please protect the imperiled wildlife at Golden Gate National Recreation area! | | | | |

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3429 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I'm writing to express my support for the NPS's mission is to protect our natural and cultural resources, especially throughout the Golden Gate NPS where the endangered W Snowy Plover nests along with other shorebirds, waterfowl and marine mammals. With my work to protect wetland habitat and the funding and time and efforts of partners to protect these vital and diminished habitats throughout the Bay area, it would be counterproductive and detrimental to NOT have these protections in place in our vast and beautiful NPSs.

Please do not allow recreation to undermine it. Alternative D best reflects the national park values: --Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. --The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. --Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. --Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your time and consideration of this important matter

Caroline Warner

Correspondence ID: 3430 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 3431 **Project:** 11759 **Document:** 38106
Received: May,26,2011 10:00:32
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Blue Sandrock

Correspondence ID: 3432 **Project:** 11759 **Document:** 38106
Received: May,26,2011 10:09:30
Correspondence Type: Web Form
Correspondence: I strongly support alternative A for Mori Point.

Correspondence ID: 3433 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/26/11

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the

original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

* Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. * Exclude speculative, exaggerated, biased, or misleading statements and studies. * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). * Align commercial dog walking rules with county or city regulations.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Emy Sakai

San Francisco, CA 94117

Correspondence ID: 3434 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/26/2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in

both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA) Sincerely, Brad Murphy San Francisco, CA 94107

Correspondence ID: 3435 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear People, I grew up in this state,my father and brother were both born in the "City", and my paternal grandmother was 12 years old and lived through the "GREAT FIRE" as the earthquake of 1907 was called. She was planted in Golden Gate Park to watch over her siblings (5 of them) who my great grandparents had just piled on an old brass bed in the park. The fire aside, San Francisco has grown up fast and furious and squeezed out almost all the the natural inhabitents. It has only been a little over 100 years since then, and I believe anything in the animal kingdom still ALIVE in "the city" deserves a free meal! Please help protect these small and vernerable critters! Thank you, Linda Reavely

Correspondence ID: 3436 **Project:** 11759 **Document:** 38106
Received: May,26,2011 10:29:41
Correspondence Type: Web Form
Correspondence: Please continue to allow us to enjoy our home, our trails, the beauty of the

ocean and environment and allow us to take walks with our children and our dogs, our family. My family enjoys walking the trails in Mori Point, we often take our children and our dog. We enjoy the ocean, flowers, exercise and meeting our friends and strangers alike on the trail. We are respectful of the space, pick up any trash we see, stay on the trails and encourage others to do so. Taking away that privilege for our dogs will seriously impact the way we enjoy the space, exercise and our quality of life here in Pacifica. There are very many dog owners, not just in Fairway, or Pacifica, but the bay area that travel to this location for the trails, and stay to eat, shop and spend their dollars in Pacifica.

Correspondence ID: 3437 **Project:** 11759 **Document:** 38106
Received: May,26,2011 10:34:08
Correspondence Type: Web Form
Correspondence: Please consider making changes to protect the wildlife that use this area for breeding and regaining strength for migrations. Please limit off-lease areas to protect the wildlife AND the humans who enjoy the area. We need to work to keep this land as pristine as possible while allowing people to visit and fall in love with this beautiful place. Additional access created in ecologically sensitive ways will allow more people to observe and enjoy this area, including access for wheelchairs and horses will increase the number of people who truly enjoy and want to protect this area. Please use common sense and creativity to find ways to protect and enhance this area. Thank you.

Correspondence ID: 3438 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation. The park is home to more endangered and threatened species than any other park in the continental U.S. More than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined! Protect these species and other protected wildlife from inappropriate activities such as motor vehicle use on beaches. The park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. Unleashed dogs represent the most significant recreational threat to wintering western snowy plovers. Endangered species

wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for listening. I implore you to give Golden Gate National Recreation Area imperiled species a chance to survive.

Sincerely, Elizabeth Ayala

Correspondence ID: 3439 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

I go to a local lake on a regular basis and I know from my own experience how dangerous off-leash dogs can be to wildlife. I found ducks and other birds bleeding from dog bites not once at this lake.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Susan Kurcz-Easom

Correspondence ID: 3440 **Project:** 11759 **Document:** 38106

Received: May,26,2011 11:03:13

Correspondence Type: Web Form

Correspondence: Please keep the park open to everyone--there is more than enough space allocated for wildlife, native plants and other nonhuman beings. Please know that we are the ones who pay the taxes that keep this area available, and as such we need to be able to access and use the GGNRA areas--with our children and dogs--who are all part of our family.

Correspondence ID: 3441 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area's mission is to protect natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserves a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Golden Gate National Recreation Area should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3442 **Project:** 11759 **Document:** 38106

Received: May,26,2011 11:30:51

Correspondence Type: Web Form

Correspondence: Hi,

I live in San Francisco and live in the Mission District. I have a dog who visits Fort Funston daily and loves it!

I have some concerns about the GGNRA's dog management proposal,

including:

Compliance-based Management Strategy cannot be part of any plan. This would entail that no evidence of impacts from non-compliance being necessary, only the fact that there is non-compliance. This will potentially end off-leash access without giving people a chance to comment on the change. This punishes responsible dog owners for the bad actions of a few irresponsible ones. It must be opposed and removed. There is no justification in the DEIS for major changes. Please support formalization of 1979 Pet Policy PLUS off-leash access in San Mateo County and on new lands that the GGNRA acquires in the future.

Thanks,

Manish Champsee

Correspondence ID: 3443 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 26, 20011 (Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards

applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: Most Saturday mornings, we take our dog Lola to Chrissy Field Beach to let her have a good run off leash. The pure joy on her face as she runs makes everyone who sees her happy too. It's like seeing nature as it should be. Chrissy Field beach is one of the few places in the city where there is enough space for the number of dogs, and the owners are mostly good about policing their pets and picking up after them. There are rarely any people on the beach at this time (between 10am and 11am) other than the dog owners. It seems a shame to ban dogs from the beach altogether at times when it isn't being used at all. The issues of appropriate clean up and keeping dogs out of protected areas is exactly the same for humans as it is for dogs. If you've ever been on the beach when there are families with young kids (and I say this as a parent with two daughters, ages 10 and 15 who I've been taking to Chrissy Field Beach since they were babies), you'll see almost the same behavior as you do with dogs. I saw a man follow his toddler over the fence of a protected area and play on it like it was their own private sandbox. Some dogs pee on the sand; so do some toddlers. Some owners don't pick up after their dogs; some families leave their children's dirty diapers on the sand. Most people are very good about taking care of the beach; a few are not.

We should support all groups who use the PUBLIC areas of our city responsibly, be they human or canine. It only causes bad feelings when one group is used as a scapegoat. I believe we can improve the quality of life for everyone if we use a little courtesy, common sense and compassion. Let's work together to come to a consensus that honors everyone's good intentions! Sincerely, Candy Buckner San Francisco, CA 94114

Correspondence ID: 3444 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 26, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

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I am writing to oppose the GGNRA's draft dog management plan. It is not

based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor original 1979 Pet Policy and view dog-walking as recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979.

Exclude speculative, exaggerated, biased, or misleading statements.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Align commercial dog walking rules with county or city regulations.

These are my personal comments and observations regarding this plan: Dogs do not negatively impact the environment. It is not the dogs that are stealing the nesting eggs from the birds, it is the crows and ravens! That is why there are fewer birds.

Mother Nature changes the landscape at Fort Funston on a daily basis. The wind, rain and wave water erosion cause the land to change dramatically. Everyday! So, it does not matter that the dogs run up and down the hills because they are always changing and will continue to do so, wether or not the dogs are there!

The dogs do not impact the ice plant - which is the natural plant that grows

out there. What the heck? Ice Plant????

Dog walkers benefit working people in allowing them to have time to go to work and spend with their families rather than doing this chore.

Dogs benefit from daily runs on the beach because they are better behaved and less aggressive when at home.

Dog walkers, by their sheer presence, keep gangs and violence off the beach and out of parks.

Our urban parks will be saturated with dogs and there will be a negative impact financially and more serious dog fights (and people fights)

There is a community of people that go to Fort Funston that will disappear and this is a tragedy.

Are the horses allowed to stay on the trails and we are excluded?

How the heck are we suppose to keep 6 large, excited dogs on leash going down the trails? I had my finger broken by a dog pulling me down the beach. How safe do you think it is for someone to be expected to dragged by 6 dogs wanting to run free? Also, I need my hands free for safety. The trails are unstable and sometimes I need to use my hands to stabilize myself or grab branches or rocks.

Sincerely, Janet Slissman San Francisco, CA 94116

Correspondence ID: 3445 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Hi,

I urge you to consider these points and to take them seriously. These things are important to ALL of us.

Keep up the TERRIFIC work you're doing!

Regards,

George...

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national

park values.

--Endangered species wildlife habitats deserve a higher level of protection from human disturbance; the compliance rate should be 95+%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas FREE from dog recreation.

--Require all off-leash areas to be enclosed to PROTECT park users, wildlife, and other dogs. What happens if someone is walking on the beach and is attacked by an unleashed dog? Severe injury? Death? Law suits? Criminal penalties for the owner? Let's just avoid all this... if it's possible.

--Limit off-leash recreation to areas where it will NOT have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3446 **Project:** 11759 **Document:** 38106

Received: May,26,2011 11:46:10

Correspondence Type: Web Form

Correspondence: The primary purpose of the park is to protect the natural and cultural resources within! Recreation should always be considered as secondary in importance. Alternative D best reflects these values. Moreover, there should be a higher level of protection from human disturbance, as concerns endangered species habitat... %75 is just not high enough. Somewhere above 90% would be much better.

The park should do more to make it accessible to different groups of users. Runners, horseback riders, families, people who need service animals, should be accommodated with multiple trails and types of trails. For those with dogs, off-leash recreation should only be in areas where it will not impact sensitive wildlife or habitat.

Correspondence ID: 3447 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: We must protect the wildlife in this area at all costs. We must stop activities that interfere with the wildlife in this prized area.

Correspondence ID: 3448 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: Please provide necessary funding and conservation efforts to preserve and save these special animals and place. They desperately need us! sincerely,
Lynette Sanchez

Correspondence ID: 3449 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: 5/26/2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely, Matt Macko San Francisco CA, 94116

Proud parent of 2 beautiful dogs who will become the innocent bystanders

of a demonstrably ill-conceived and selfish plan.

Correspondence ID: 3450 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: please enforce leash laws and protect endangered wildlife in Golden Gate

Correspondence ID: 3451 **Project:** 11759 **Document:** 38106
Received: May,26,2011 12:06:26
Correspondence Type: Web Form
Correspondence: It is very important that any new land that the ggnra (or in general the national park) should obtain should not allow dogs at all and clearly there should be no dogs off leash. This federally funded park is the only that allows for dogs off leash and it should not be that way. Dogs should be on leash in all national parks. However, I can understand that people are used to one thing and will be very resistant to change, even though in this case the change is undeniably for the greatest benefit of all people and also better for the environment and our future. However, any new land should be treated as it should be treated with no dogs off leash and preferably no dogs at all. In particular, I am concerned about the new area on the san mateo coast. Please don't let dogs ruin this space for others and future generations.

Correspondence ID: 3452 **Project:** 11759 **Document:** 38106
Received: May,26,2011 12:15:25
Correspondence Type: Web Form
Correspondence: Hello,

Regarding the Draft Dog Management Plan: I believe there is too much control of dogs already. Please allow this place for them to continue to be off leash.

I also feel trepidation about the additional funds that would be needed to patrol and enforce the area if another regulation is created.

Life is meant to be free. Unfounded fear about "marauding dogs" is just that ... unfounded. Please, take a break from creating yet another regulation that places restrictions on how our environment is experienced and enjoyed by all of us, non dog owners and dog owners alike. Thanks.

Correspondence ID: 3453 **Project:** 11759 **Document:** 38106

ID:**Received:** May,26,2011 00:00:00**Correspondence** Web Form**Type:****Correspondence:** Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any

public input.

Sincerely,

Ally Blake

Correspondence ID: 3454 **Project:** 11759 **Document:** 38106

Received: May,26,2011 12:29:49

Correspondence Type: Web Form

Correspondence: The pit pull attack on another dog (resulting in that dog's death) this past Sunday is yet another example of why dogs should not be allowed off leash and should be restricted to certain areas. All the dogs involved were on the beach off leash and this likely would have been prevented had the dogs been on leash. The owner and the pit bull got away which is another reason why there needs to be a good way of identifying dogs. All dogs should have permits and an ID (similar to a driver's license) should be clearly visible for others to see. From this and many other dogs events, I believe permits and "driver licences for dogs" (all dogs should wear vests with ID on side) is a very good idea. Any person that brings their dog without an ID should get a warning and then a fine.

Correspondence ID: 3455 **Project:** 11759 **Document:** 38106

Received: May,26,2011 12:30:49

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

Im a San Francisco resident born and bred and have been taking my dogs to Baker beach, Fort Funston and Crissy Field even since I was a toddler.

The human animal bond is very important to me. As a responsible dog guardian, I keep my dog under voice and sight control, clean up after her/him, and keep her/him out of the fenced dunes and vegetative areas. It is important for my dog walking friends and me that areas above remain open for off leash dog walking access.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site specific conditions.

As a responsible dog guardian and advocate for animals, I know it is crucial

that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well-behaved dog. Having places where I can take long walks with my dog allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dog and dog guardians will not have sufficient opportunity to exercise and recreate.

Some areas within the GGNRA also serve as a place of solitude for me and provide me with a very important peace and safe outdoor space and experience within the San Francisco Bay Area, a large metropolitan area.

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts ? other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors.

The DEIS needs to provide full disclosure to the public and decision makers. If dog related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. [You could give examples where the DEIS says there are impacts in an area that you have not observed in that area or where the

problem is does not seem to be caused by dog]. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone ? so that an informed decision can be made.

And lastly, after much consideration, I support Alternative A, the No Action alternative and would also include the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra) in San Mateo county.

Respectfully,

Susan Lee San Francisco, CA 94115

CC: Representative Nancy Pelosi, U.S. House of Representatives

Ken Salazar, Secretary of Interior

Jon Jarvis, National Park Service Director

[YOUR local dog group, i.e., Fort Funston Dog Walkers, SFDOG, etc.]

Correspondence ID: 3456 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: All living things on US public lands are to be protected; since James "The Destroyer" Watt was Interior, "management" has come to mean giving it all away - not even charging the 25 cents a two-bit whore would get - to greedy,rapacious corporate interests, PRIVATE interests. This must stop BEFORE it's all gone; by then it will be too late to save anything.

Correspondence ID: 3457 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: SAVE THE ANIMALS!! IT IS IMPORTANT!! DON'T BE CRUEL!!

Correspondence ID: 3458 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Golden Gate National Recreation Area may be one of our country's boldest

park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3459 **Project:** 11759 **Document:** 38106

Received: May,26,2011 12:55:52

Correspondence Type: Web Form

Correspondence: I am very concerned about the current situation in GGNRA regarding dogs having what is effectively unlimited and unrestricted access to all the areas of the park. Specifically at Crissy Field I have noticed damaged fencing and also seen dog owners facilitating their dogs following them into areas that have been fenced off or marked with the universal symbol for "no dogs". Along the Land's End trails dogs are running unleashed, even though I do believe I saw signage, and I've had to step aside on narrow parts to let the dog and running owner pass. Dogs and people are just 2 species that need to make use of these areas. I firmly believe that access for dogs needs to be restricted by fencing and by enforcement of "no dogs" signage in those areas and along trails that are narrow or pass through areas that are being used for nesting or replanting. And for their owners, compliance has to be firmed up; setting compliance for 95% is entirely reasonable. The current requirement of 75% is a "C" grade in school; it's average, not good. 95% is an "A". It's

really too bad that careless or belligerent dog owners have usurped control of the parks from other visitors and from the other species that live there. In addition to restricted access, education and enforcement of stricter standards is what I believe to be the only solution to what has become a depressing problem.

Correspondence ID: 3460 **Project:** 11759 **Document:** 38106

Received: May,26,2011 13:04:38

Correspondence Type: Web Form

Correspondence: The Golden Gate National Recreation Area is a wonderful place for wildlife of many kinds to breed, rest and visit. There are many endangered species who visit regularly. The current rules for unleashed dogs, horses, runners and hikers are really encroaching on the needs of these species. It should be possible to set-up paths, beaches, and other places that will provide ample recreation for the humans and their dogs and still protect the wonderful wildlife that were the main reason for setting up the park system in the first place.

Correspondence ID: 3461 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear decision maker,

I am contacting you regarding the Golden Gate National Recreation Area, and ways to protect and preserve the wildlife there.

I believe that endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Two suggestions: -Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. -Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your consideration.

Best regards, Gregory Coyle

Correspondence ID: 3462 **Project:** 11759 **Document:** 38106
Received: May,26,2011 13:13:02
Correspondence Type: Web Form
Correspondence: Greetings, I was a long-time resident of San Francisco and still visit the GGNRA and San Francisco parks weekly.

More controls on dogs are desperately needed in the parks to protect wildlife, plant life and

I volunteered for the GGNRA on several bird censuses over a period of many years. While doing the counts and monitoring, I frequently witnessed dogs chasing birds, going into areas marked off as cliff swallow habitats and trying to climb up to the nesting holes and, of course, defecating all over natural habitats. I saw dogs going after quail babies in Golden Gate Park, as well as dogs digging up plants and barking at nesting herons.

Meanwhile, their owners walked on, not having the dogs under voice control and rarely putting leashes on them, even after their misconduct had been pointed out by myself and other volunteers.

At Crissy Field and Fort Funston, I have been attacked five times and barked at threateningly many more times. I am a senior woman, and I certainly don't do anything to antagonize dogs. Fortunately, I was not harmed.

Unfortunately, dogs can be very destructive. More controls are needed so that other living things are not harmed by them in our parks.

Correspondence ID: 3463 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA's draft dog management plan. I have been coming to Fort Funston with my dogs since 1985. I currently have 3 dogs, two of them rescue dogs. One of my rescue dogs, Cosmo, is a Border Collie/Golden Retriever mix and he is deaf. When we adopted Cosmo we were told that he would never be able to go anywhere off leash because of the increased danger of getting hit by a car, since he would never hear it coming. Cosmo has been going to Fort Funston for 8 years. He knows the

territory and is very comfortable there. This is in contrast to the anxiety he experiences when he is in an unfamiliar environment, which becomes readily apparent by his change in behavior. Fort Funston is the only place in San Francisco where Cosmo can safely run and play off leash. Border Collies need to run daily and there is no possible way for them to run as much as they need to while on a leash.

In addition to the benefits that my dogs enjoy by spending time at Fort Funston, it is so vital to my wellbeing and the wellbeing of my fellow dog lovers. An hour at Fort Funston is filled with fresh air, laughter and exercise. You can't help but smile when you see all of the dogs playing. One of my rescue dogs is a 7 year old Bassett Hound named Sasha. I have always known that Bassett Hounds can move much faster than one would think, but this morning Sasha was playing with a very fast little dog. No one had ever seen a Bassett Hound run so fast and for such a long time. We couldn't stop laughing, and laughter is so rare and so healthy. Sasha needs to run to keep her weight down to avoid back problems down the road. She couldn't have played like she did this morning at a city park.

My third dog is a 5 pound Chihuahua named Schnecken. While she could get her exercise anywhere due to her petite stature, I have never seen her as happy as she was this morning. The weather was perfect and a wonderful time was had by all. It would be a tremendous loss if we will no longer be able to have such times again.

The GGNRA's draft dog management plan is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. ? Respect dog-walking as legitimate

recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. ? Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Thank you for your consideration.

Correspondence ID: 3464 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: FIRST, THANK YOU FOR ALLOWING THE PUBLIC TO PARTICIPATE IN DISCUSSIONS. My feelings are: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. ? ?-- Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.?? --The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.?? --Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.?? --Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.??? I have dogs myself who are well trained and still they might do erratic things that would be a negative in this environment. Also, I find that many dog owners either do not really care, or think they have a trained dog when they do not, and essentially are unable or unwilling to make sure their dogs have no effect on this fragile environment or the wildlife living there. Although good intentions abound there is a large "OOPS!!" factor when it comes to people or dogs and their respect for a sensitive area. I am glad that you (I hope) will strengthen the impact on this area. Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.??Sincerely, MARJORIE LUNSKY

Correspondence ID: 3465 **Project:** 11759 **Document:** 38106

Received: May,26,2011 13:49:21

Correspondence Type: Web Form

Type:

Correspondence: The GGNRA's Preferred Dog Plan appears to have been developed without any consideration given to the impact the proposal would have on the city of San Francisco itself and its residents who actually use these areas.

The GGNRA is nothing like Yellowstone National Park and cannot be managed in the same way. Yet the NPS seems to know only one management model and therefore feels it must apply the same regulations to the GGNRA that it does to national parks. The GGNRA is an urban recreational area. Since San Francisco is so densely populated, Ft. Funston and Crissy Field serve as backyards for many San Francisco residents with dogs. For many of us, our dogs are like our children and it is our responsibility to provide what they need for healthy, happy lives. Many of us visit Ft. Funston and Crissy Field every single day to provide the off-leash recreation so essential for our dogs' well-being.

Although The GGNRA was required to consider the impact of their proposed changes on city parks, they failed to do so. The city's limited supply of dog parks have proven to be completely inadequate for their purpose. This point that was driven home very clearly on Friday, March 11, when the tsunami warning forced the closing of Ft. Funston and Crissy Field. Stern Grove, one of the largest off-leash city parks, was completely overwhelmed by dogs -- on a weekday.

Currently 99% of the GGNRA overall is closed to off-leash dogs, and it has been estimated that the current proposal would decrease that remaining 1% by 90%, leaving approximately one tenth of one percent available for off-leash dog recreation. The proposed reduction at Ft. Funston and Crissy Field is estimated to be 75%. How can this possibly be considered shared use for those San Francisco dog guardians who currently use Ft. Funston and Crissy Field far more than any other group?

Many years ago only drug-dealers and the homeless frequented Ft. Funston. It was dogwalkers who discovered it was the perfect place for their dogs to run off-leash. By doing so they gradually forced the drug-dealers and the homeless out of the area, making it safe for others to use. Now the GGNRA is saying to them "Thanks for making Ft. Funston safe, but you are no longer welcome here."

Whatever management problems may exist in the GGNRA cannot be blamed on dogs, so don't make them your scapegoats.

Correspondence ID: 3466 **Project:** 11759 **Document:** 38106
Received: May,26,2011 13:50:22
Correspondence: Web Form

Type:

Correspondence: Please reconsider. These are two of the reasons there are so many dogs in the shelters. People need a place to take their dogs, especially living in the city, where many do not have access to a yard. Dogs need to run, or often they have behaviour issues, stemming from built up energy and boredom, and guardians need a place to take them.

This hurts everyone. The shelters will be even more overcrowded.

Those who adopt should be rewarded, not made to feel as though no one wants them to succeed.

This also affects the dog-walkers and they provide a much needed service to all of those who work long hours, and are unable to give their dogs the outings they need to be healthy.

I implore you to consider these issues.

Sincerely, Sacha Blake

Correspondence ID: 3467 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Correspondence ID: 3468 **Project:** 11759 **Document:** 38106
Received: May,26,2011 13:55:54
Correspondence Type: Web Form
Correspondence: I urge you to accept Alternative D as it reflects the best solution to provide and protect the future habitat destruction of the Bay. Requiring all off-leash areas to be enclosed protects endangered wildlife that is just beginning to return after much public money has been spent to restore this area. The will of the people is clear. It is imperative you vote to protect and restore this valuable resource for future generations to come.

Correspondence ID: 3469 **Project:** 11759 **Document:** 38106
Received: May,26,2011 14:09:10
Correspondence Type: Web Form

Correspondence: Hello,

I am writing to OPPOSE the proposed GGNRA Dog Management Plan that cuts almost all dog recreation including current on-leash trails and voice-control areas.

Bay Area people depend upon the GGNRA for outdoor recreation to exercise and to appreciate nature. This includes some 450,000 (15%) Bay Area residents with dogs who use the trails for daily exercise, health, and socialization, and there are few other dog-friendly trails, particularly in San Mateo County.

Have you ever seen the sheer glee and joy in the face of a dog off leash? Free to be dogs, not leashed subordinates to humans, they come alive and send joy right back to their owners. Dogs can play, run and frolic without destroying the environment.

Of course, dogs do have some impact on the environment, but it's always a few bad dog owners, (not the dogs) who ruin it by not managing their dog's recreation. The majority of dog owners ARE responsible.

Perhaps we, as dog owners, should have to take and pass a test on dog "civics" that would give us a right or license to have our dogs off leash. The non-passing/non-licensed dog owners should be fined and kept off the trails, not every other dog owner.

If this plan does pass, I will probably never adopt another dog again. If dogs can't play, what value is their living? I know that dogs are NOT human, but to many of us, they are equal members of our family. Who in their right mind would always maintain their child on a leash, prevented from romping or playing? Why in the world do we think we are so much better than these beautiful loving creatures and how can we even consider restricting their freedom so severely?

I urge you NOT to pass the proposed plan for the sake of all dogs and our own humanity. It is the right thing to do.

Respectfully, Therese Langille

| | | | |
|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 3470 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for | | |

humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 3471 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence 3472 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: These are our fellow earth beings and deserve their right to life as much as the humans and their pets using the parks. It is time for all people to "man up" and be responsible.

Correspondence 3473 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 15:20:47

Correspondence Web Form

Type:

Correspondence: I am asking you to protect our resources, esp in the Golden gate Park. As an American and Californian, I treasure our parks, they are our treasures and must be protected. I urge you to consider the destruction caused by the public, their toys and animals. While dogs love to run, they can be very destructive to wildlife and people. They do need places to run off leash but these should be designated AND enclosed to likmit damage. I urge you to vote for Alternative D. Please give wilflife their best chance. I want to be able to enjoy this park as I have in the past. I do not want to have to worry about dodging loose dogs or watch them chase or destroy birds and other wildlife.

Thank You, Beht Piburn Los Alamitos, CA

Correspondence 3474 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 15:34:43

Correspondence Web Form

Type:

Correspondence: Recreation areas should be open to all, including responsible dog owners. Irresponsible dog owners unfortunately will break the rules regardless of what those rules are. Banning dogs will only punish responsible dog owners, when the real problem is lack of enforcement of existing laws regarding dog recreation. Recreation areas are not wildlife preserves, they are public parks, and humans have a far greater impact on the environment than dogs. Please retain the existing off leash and dog accessible areas so that humans and dogs may continue the joyous activity of playing together at the beach. Sincerely, Laura K. Johnston and Luna Petunia

Correspondence 3475 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 15:35:06

Correspondence Web Form

Type:

Correspondence: Hello, I've had a boxer puppy for about 7 months now my first dog. I live a block away from Orange park dog park. Its great to have one so close. On weekends my dog and I enjoy long walks at Fort Funston, Crissy Fields, Point Isabel. Not once in my 5 months of attending those off leash sites, have I witnessed a dog attack a person, or damage another dog to the point of medical help. Yes of course theres be fights between dogs here or there but nothing out of control. These places are always filled with dogs, happy dogs,with happy owners. If you take all these sites away from us what are we suppose to do? all go to the same park? It's ridiculous all dog owners alike cherish moments at fort funston and Crissy fields. Please don't take this away from us, it keeps people active and makes our life just a tad bit easier during these rough times.

Correspondence ID: 3476 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Correspondence ID: 3477 **Project:** 11759 **Document:** 38106

Received: May,26,2011 16:20:55

Correspondence Type: Web Form

Correspondence: This is a very poorly thought out and unfair plan, that does not properly balance the allocation of resources to the constituent users. The current regulations address most of the complaints re dogs and should be enforced; there is no need to exclude properly supervised dogs off leash on most of Ocean beach, particularly when most of concerns stem from excessive and inappropriate human usage, i.e. alcohol, graffiti, drugs, bonfires, trash, etc. There are no convincing peer reviewed scientific data that these regulations are necessary for protection of habitat or wildlife and the solutions are draconian. One can be sure that there will be no accommodation even if, in 5

years,there is no improvement no improvement in any outcome measures. Cramming all the dogs and handlers into a small area will only lead to more problems of a different nature.

Correspondence ID: 3478 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: As a former resident of San Francisco - my father and grandmother were natives of the city - I am a supporter and a fan of Golden Gate Park. I lived just two blocks from the edge of the park and have spent much time there over the years.

I am concerned about the presence of dogs that are not leashed and am writing to ask that all off-leash areas be enclosed to protect the many varieties of wildlife there. Please work to limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Golden Gate Park is a special place, one like no other, and it deserves the greatest level of protection possible. Thank you.

Correspondence ID: 3479 **Project:** 11759 **Document:** 38106

Received: May,26,2011 16:42:25

Correspondence Type: Web Form

Correspondence: i have been following the GGNRA's attempt to eliminate off-leash dog walking at its current locations for over 10 yrs. now. And after 2 yrs. of Negotiated Rule Making, an astronomical cost, and 2400 pages, i'm stunned to read the DEIS and it's proposed alternative. I concur with many who have read this tome, there is nothing to justify such a dramatic alteration of the current off-leash dog areas. There is no empirical data to support the claims of increased safety incidences, at least nothing that would justify this kind of restriction. And the plan's attempt to link off-leash and leashed dogs to severe environmental degradation just isn't valid. Increased use of the parks will have a detrimental affect on its ecology... but that's because more people, with and without dogs, are using the parks as they were supposed to be used.. for recreation. I strongly request that until you can unequivocally prove dogs are indeed hindering the mating of the snowy plover and bank swallow, and that these species are dependent on these particular nesting areas for their survival, you continue to allow dogs and most importantly dog owners the right to recreate in these precious areas. Thank you.

Correspondence ID: 3480 **Project:** 11759 **Document:** 38106

Received: May,26,2011 17:01:14

Correspondence Web Form

Type:

Correspondence: As a responsible dog owner, regularly cleaning up after my own dog and others, I encourage you to preserve the privilege of myself and other responsible dog owners to enjoy the parks with our furry friends. We can share the space and there is a joyful benefit to the spaces being enjoyed by diverse groups. I believe well marked off limits/ areas to preserve habitat and wildlife needs can be adequate to promote responsible use of the parks. Education and dog owners working together can help supervise the behavior of less responsible owners and in fact the majority of us are in the former group. Thank you for your consideration and recognition that we all benefit from sharing the parks. Dr. Jennifer Clemons ND, LAc and Dragon (10 year old mutt and best friend)

Correspondence ID: 3481 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 17:18:52

Correspondence Web Form

Type:

Correspondence: To Whom It May Concern:

I'm writing to comment on the proposed dog management plan for the GGNRA. I am going to confine my comments to Ft. Funston, because that is the GGNRA location that I visit most frequently, although I also occasionally visit Ocean Beach and Crissy Field.

I strongly object to the proposed alternative for Ft. Funston. I walk my dog off-leash in Ft. Funston every week-and often multiple times per week-and I believe that the proposed alternative will prevent me from being able to enjoy the space.

I discovered Ft. Funston when I got my first dog three years ago. Because I wanted to walk her off leash to give her adequate exercise, I started going to Ft. Funston and began to appreciate what a wonderful place it is. As an urban dweller I don't get out into open, natural spaces as much as I would like. But because of my need to walk my dogs, I now enjoy the ocean breeze and view at Ft. Funston, and get some exercise as I walk along the beach in a way that I never would if I didn't have a dog.

My main objection to the proposed alternative for Ft. Funston is that it seems to ignore the fact that Ft. Funston is not a pristine wilderness area ? it is, in fact, a recreation area that is meant for human recreation as well as for animal and plant life. The proposal elevates the needs of non-human animal and plant species above those of human beings. In fact, it does not acknowledge at all the value of recreation for city dwellers and instead

considers recreation to be a negative impact on the GGNRA.

Wilderness protection is not the only use for public lands. Recreation is also a very important use ? especially in a dense urban area like San Francisco that has limited open spaces. When San Francisco gave control of Ft. Funston to the GGNRA, one of the primary mandated uses of the space was recreation. Right now the vast majority of those of us who use Ft. Funston as a recreational area are people with dogs-and your proposed alternative would limit our ability to enjoy the space in the way that we historically have.

The proposed dog management plan also does an inadequate job of analyzing the impact of the proposed changes at Ft. Funston and throughout the GGNRA on San Francisco city parks. Your perfunctory listing of other park spaces that are available within a ten-mile radius does not address whether or not dogs are allowed off leash in those parks and what the impact on those parks will be when hundreds upon hundreds of people are forced to begin using those parks instead of the GGNRA. The city of San Francisco should be extremely concerned about this aspect of your proposed alternative.

I recommend that instead of the proposed alternative for Ft. Funston, the GGNRA fix the fencing around the wilderness protection area, which you acknowledge in the draft dog management plan is partly buried, and improve the signage. Other than that, you should keep the rest of Ft. Funston off-leash, as it has been for decades.

The highest use for Ft. Funston, whose pristine state ceased to exist decades ago when barracks and coastal batteries were built on the land, is recreation for the public.

Correspondence ID: 3482 **Project:** 11759 **Document:** 38106
Received: May,26,2011 17:26:34
Correspondence Type: Web Form
Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. There must be a happy medium and people and animals should be able to coexist and enjoy this beautiful area. Admit I have never been there and regret that, but hope to be able to do that some day and live in California permanently now.

Correspondence ID: 3483 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: Dear Mr. Dean, I am writing to vehemently oppose the GGNRA's draft dog management plan. I believe it is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Francisco County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Correspondence 3484 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 18:00:58

Correspondence Web Form

Type:

Correspondence: Please keep Fort Funston an off-leash play area for dogs. People who take their dogs there are super respectful of the habitat areas, always pick up dog waste, and only take dogs off leash that are social, friendly and under good voice control. It is one of the few areas in the Bay Area where dogs can really run, people can enjoy a scenic vista, and dogs can swim and play with lots of other friendly dogs. It would really be a shame to take one of the only outdoor places that is possible away from the dogs of the Bay Area and the people that love them.

Correspondence 3485 **Project:** 11759 **Document:** 38106

ID:**Received:** May,26,2011 18:02:22**Correspondence** Web Form**Type:****Correspondence:** You have a wonderful park, but it's objectives need some control and protection. One size does not fit all. Let's take away the cookie cutter-like pattern it has drifted into.

You have endangered species wildlife habitat that must be protected. Unleashed dogs, runners, horses, families, service animals must have their own trails and recreation sections. Unleashed dogs should be kept in controlled areas, never near wildlife.

Correspondence ID: 3486 **Project:** 11759 **Document:** 38106**ID:****Received:** May,26,2011 00:00:00**Correspondence** Web Form**Type:****Correspondence:** 5/25/11 (date) Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow

additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: of hundreds of thousands of dog visits to GGNRA land in a year there is an extremely low number of negative interactions with either other people or wildlife. This plan is much too extreme for an urban environment Sincerely, Michae Fasman San Francisco CA 94114

Correspondence ID: 3487 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other

recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

David L. Siva

Correspondence ID: 3488 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 26, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed and legislated as an urban recreation area, not as a pristine wilderness area like Yosemite. The San Francisco Bay Area is one of the most densely populated regions in the whole United States. Every person working in conservation will tell you densely populated urban areas are GOOD for conservation because mindless sprawl like in the rest of the country decimates habitat for flora and fauna. To use the Endangered Species Act and a species whose true extinction threat such as the snowy plover as a blunt instrument to achieve more conservation at the GGNRA is highly questionable from all angles and may be counterproductive in the long run. Any true conservationist who sees the big picture will let the dogs run on the beach and fight like hell to combat global warming and the

nuclear industry.

Urban recreation and the GGNRA are an indispensable part of what is essential for the health and well-being of the region's six million people and their numerous pets. The use patterns of the GGNRA over the decades are something that was legislated at the time of creation and any significant change of policy must be put up to a referendum vote for all those who live in the Bay Area. The pet policy is only one of the proposed changes, if this policy proposal is an indication that the GGNRA is intended to be transformed into a National Park, this must be done transparently and democratically, not in a smoke-filled backroom without public input.

In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address and mitigate any significant adverse impacts from recreational activities. Use objective standards applicable to all recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely,

David Seidel, AIA Jessica Kaplan, M.D. Daniel Seidel, (4 yr. old human)
Otto, (8 yr. old canine) San Francisco, CA 94123

Correspondence ID: 3489 **Project:** 11759 **Document:** 38106
Received: May,26,2011 18:28:55
Correspondence Type: Web Form
Correspondence: I would like to add my concern about restricting leashed dogs on Mori

Point.

Our daughter lives in Fairway Park and we have taken walks with their dog for about nine years.

Open space is hard to come by near a city. Many people have dogs and will be expected to bring them to an open space.

Requiring dogs to be on a leash is certainly reasonable and enforcement can be expected to be met with good will by most people.

An arbitrary rule restricting leashed dogs to only two paths is just asking for enforcement problems.

Correspondence ID: 3490 **Project:** 11759 **Document:** 38106

Received: May,26,2011 18:36:21

Correspondence Type: Web Form

Correspondence: Pacifica, May.25th.2011

Frank Dean, Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Mr. Dean,

I am against the GGNRA's draft dog management plan. It destroys totally my daily live. I walk every day with my dog of leash for about 4 miles. My doctors advised me to do so. I am a heart patient. This draft is discrimination against all dog lovers. The old rules are good and worked for many years, please keep them in place.

Sincerely, Thomas George-Williams Pacifica, CA 94044

Correspondence ID: 3491 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as

outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3492 **Project:** 11759 **Document:** 38106

Received: May,26,2011 18:46:31

Correspondence Type: Web Form

Correspondence: May 26, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

My name is Nancy Lund. I live in Berkeley in Alameda County. I frequently visit Fort Funston and Crissy Field.

I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA.

All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement, the National Park Service inappropriately singles out dogs. Its conclusions are not based upon sound science nor long-term monitoring of site-specific conditions.

Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

The GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeney Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo County).

Respectfully,

Nancy Lund Berkeley, CA 94708

Correspondence ID: 3493 **Project:** 11759 **Document:** 38106

Received: May,26,2011 18:56:43

Correspondence Type: Web Form

Correspondence: I have been taking my dogs to Fort Funston for over twenty years. I don't know what I would do without it. Most dogs are noticeably more relaxed when off-leash resulting in very few altercations. As a matter of fact, in all the years I have gone there I have only had two issues with other dogs. Today's dog population that generally live in cities with working "parents" need the freedom to run and play to be healthy, happy animals. Considering the ratio of dogs to people today in San Francisco and the Bay Area, it is even more important that dogs and their owners should have a place like Fort Funston to walk and play regularly. There are plenty of parks where dogs are not allowed that dogless people can visit!!

Correspondence ID: 3494 **Project:** 11759 **Document:** 38106

Received: May,26,2011 19:04:18

Correspondence Type: Web Form

Correspondence: May 26, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan and sincerely hope you do not approve it. I attended an open house session in Pacifica on Weds March 9, 2011 to learn more about the plans and alternatives, and came away convinced that the GGNRA was not adequately taking a number of factors into consideration. Further reading and thinking on my part has reinforced this perspective.

I live in Pacifica, San Mateo County, and work as a professor at San Francisco State University. I have a busy schedule and rely heavily on many GGNRA areas to walk my two medium-sized (35-45 pound) Australian shepherd dogs on a daily basis. I visit Ft Funston with the dogs a couple of

times a week on average so they can run off leash there. Particularly important for me are the Milagra Ridge trails and the Mori Point trails because I jog there 3-4 times a week with the dogs, often as part of my training for half marathon trail runs. I also walk with my dogs and my 10-year-old daughter at least several times at Linda Mar Beach in Pacifica and the beach at the Pacifica Pier. I oppose the GGNRA preferred plan for a number of specific reasons.

First, when I am trail running the dogs constitute a form of security for me. Yes, they are getting much needed exercise, but they are also providing me another two pairs of eyes and ears. Given the isolation of many of these trails, especially when you are more than 2-3 miles from the trail heads, I would honestly not feel comfortable running or walking there without the dogs. As a note, I have been training for a June trail run in the San Pedro Valley County Park in Pacifica, where you cannot bring dogs at all, and after one or two training runs have realized how uncomfortable I feel going off the main thoroughfare without any accompaniment (and, unfortunately, it is rarely feasible for me to have another human companion). To ban dogs entirely from the Milagra Ridge trails, in particular, would make it more risky for women such as myself to use these trails for anything other than short walks, and in fact would make me sufficiently uncomfortable so as to prevent me from using them at all. Given the rarity of 13 miles of uninterrupted jog-able trail, this does not seem in keeping with the mission of the GGNRA to accommodate recreation and conservation. Furthermore, I know other women hikers who would similarly feel unsafe. I should add that we are not worried about cougars or coyotes but about potential human aggression, which is not unreasonable given the surrounding urban environment. Second, the rationale for the complete ban on dogs from trails such as Milagra Ridge seems highly flawed. At the March 9 open house in Pacifica I was told by the ranger there the GGNRA wanted to completely ban dogs from Milagra Ridge because it constituted one of the less spoiled natural areas in the county and hosted a variety of birds. The fact that Milagra Ridge is an island ecosystem with a wide array of species is undisputed, and is part of what makes the area special. However, this is true today although dogs are currently permitted there on leash. Since birds and other wildlife are clearly happy there, why change what is already working when it is at the expense of people like me who want to use these trails with my dogs? On Milagra Ridge in particular there is such thick bush and foliage on each side of the trail that it is almost impossible for dogs, on leash or off, to leave the trail and disrupt the animals. Furthermore, these trails are sufficiently steep and remote that very few people (with or without dogs) actually use them except die-hard hikers and trail runners like myself (again, especially beyond the 2-3 miles past the parking lot). The decision to ban dogs entirely from them seems based on an idealistic vision that is not in keeping with the GGNRA's mission. It does not take into consideration the traditional use of this land or the reality of what is working there today

already with the current leash law in place.

Third, by restricting more GGNRA land to dogs and pet owners you will place an incredible burden on existing San Francisco off-leash dog areas, and give those of us living in San Mateo County fewer and fewer options for taking care of our animals properly. Around one third of Bay Area residents own dogs, and many of these dogs need daily off-leash exercise to avoid canine behavioral problems. The more you make it difficult for busy people to exercise their dogs, the more likely it is that these dogs will have behavioral problems and end up in shelters. The alternative is to restrict dog ownership, especially ownership of medium and large dogs, to wealthy people who can afford to own private land. To provide sizable off leash access at places like Ft Funston is part of the mission of GGNRA to provide for the needs of all Bay Area and San Mateo County residents regardless of income and living situation. There are dozens and dozens of parks and wildlife areas in the Bay Area and northern California that do not allow dogs. We need the GGNRA to expand tiny percentage of dog-friendly parks and trails, not restrict them further. I believe the GGNRA can accommodate both recreation and conservation, as it has done for many years. It was designed as an urban recreation area, not a pristine wilderness area. I wish there were more of these in the state, but the Bay Area urban environment and the GGNRA is not the place to try and do this without comprehensive reform of all laws and norms regarding lifestyle, economics, etc. I urge you to consider revising your dog management plan to: ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County, where more not fewer off leash and dog friendly areas are desperately needed

? Honor the original 1979 Pet Policy and respect dog-walking as legitimate recreation and need. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. Thank you, and I hope you will take these comments into consideration.

Sincerely, Nicole Watts Pacifica, CA 94044

Correspondence ID: 3495 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Web Form

Type:

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. Also, the park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals by offering more than one trail and more beach areas free from dog recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Finally, limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3496 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Thursday, May 26, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog

walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: one my purest joys is watching my dog run free. She runs and jumps and plays and it reminds me of my own childhood. When she is on a leash, she still enjoys being out, but seems frustrated, and I similarly feel frustrated. While I do live in Oakland, I have spent time with my dog outside in various public areas of San Francisco, especially Christy Field. We've had many great times there, met numerous nice people with nice dogs, all of whom were off-leash and well-behaved.

At a more general level, San Francisco is a progressive place. We believe in reasonable personal freedoms, especially when those freedoms do not significantly impose on our neighbors (eg, gay marriage, medical marijuana, etc). Walking my dog does not impose on anyone -- if anything it brings joy to others (ie, "What a cute dog!").

But go ahead and pass your dog management plan. All it will do is make San Francisco suck for dog owners and they can come live in Oakland. We could certainly use the influx of nice, responsible dog owners and tax payers.

Sincerely,

Steve Hull Oakland, CA 94605

Correspondence ID: 3497 **Project:** 11759 **Document:** 38106
Received: May,26,2011 19:20:54
Correspondence Type: Web Form
Correspondence: Plrase make a leash law for dogs on the beaches where birds are trying to survive.

Correspondence ID: 3498 **Project:** 11759 **Document:** 38106
Received: May,26,2011 19:36:04
Correspondence Type: Web Form
Correspondence: I would like to make a brief comment as a dog owner and citizen. I have walked my dogs off leash at Fort Funston for almost 20 years. During that time, I have been impressed by the collegiality and care for the environment shown by the user groups. I have also seen impressive restoration of native vegetation, which has not been in any way disturbed or impeded by the presence of dogs off leash. Almost all of the dog owners I have encountered over the years have been respectful of the off limits areas, have cleaned of

after their dogs, and have cooperated with Park Service personnel. In an era of budget cuts to our National Parks, the presence of many responsible dog owners is a real benefit as this kind of usage helps keep Fort Funston safe and accessible for all. Based on all of the above and on the lack of very few alternatives for safe and healthy off leash dog walking in the urban environment of San Francisco, I VERY STRONGLY oppose the proposed restrictions in the proposed Dog Management Plan. As a responsible dog owner and citizen, I believe that these new rules are unwarranted, unfair, and will have a negative long term impact on Forth Funston and the GGNRA if they are implemented. I have contacted my elected representatives about this and will remain actively engaged to do everything in my power to insure that this wonderful resource for people and doges - many of whom are from shelters - remains available to our community.

Kevin Shannon, M.D.

Correspondence ID: 3499 **Project:** 11759 **Document:** 38106

Received: May,26,2011 19:40:05

Correspondence Type: Web Form

Correspondence: As originally outlined in the letter sent to you earlier, I am vehemently opposed to the Golden Gate National Recreation Area's (GGNRA) Draft Dog Management Plan. The plan proposes to either eliminate or severely limit dog-walking access in 21 locations in Marin, San Francisco and San Mateo counties - including traditional off-leash areas like Crissy Field, Fort Funston, Marin Headlands, Mori Point, Muir Beach, Ocean Beach, and Rodeo Beach.

For people with dogs in the GGNRA area,located in a major urban area with minimal open space, these restrictions will have a dramatic impact, much so that those whose pets are such an important part of their family very well might consider moving where there are less restricte rules and regulations. I believe an "acceptable" dog management plan MUST take into consideration the impacts of the proposed plan on neighboring city parks, on the health and well-being of people who enjoy recreational dog walking, their pets or pets of friends unable to walk their pets, and must respect the recreational values that are part of the GGNRA's original mission ("to provide for the maintenance of needed recreational open space"), which this plan fails to do.

To do anything opposed to the original GGNRA mission would be egregious and liable to civil action.

Correspondence ID: 3500 **Project:** 11759 **Document:** 38106

Received: May,26,2011 19:41:17

Correspondence Web Form

Type:

Correspondence: May 26, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, I have been a resident of San Francisco since 1978, and I have been a homeowner in the Forest Hill neighborhood since 1986. I have raised my daughters here as well as our dogs. We have spent years walking our dogs at Fort Funston and Crissy Field. While my children were in elementary and middle school, I walked at Fort Funston every single day, and when my children were in high school, I walked the dogs at Crissy Field every day. Now we alternate walks between the two parks, but still walk our well-behaved, under voice control dog at one or the other park each and every day. It is an important part of our lifestyle for the health and fitness of our dogs and us humans. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Ellice Sperber San Francisco, CA

94116

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| Correspondence ID: | 3501 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 19:49:14 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Since the park's mission is to protect the natural and cultural resources I believe that recreation should not undermine it. Give better protection to the habitat of endangered species. Keep dogs away from sensitive areas, especially the beach, which is the breeding grounds for snowy plovers. Have off leash areas enclosed. | | |

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| Correspondence ID: | 3502 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 20:00:44 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | "I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces." | | |

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| Correspondence ID: | 3503 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 20:01:08 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I strongly object to the cavalier attitude of GGNRA.I take my dog to run loose 5X a week.It is also good exercise for me.I am retired.I also have interesting conversations with other dog people.I sometimes think the GGNRA is using the off leash dogs to mask their own mismanagement of maintaining the area.Mr Dean only speaks in general terms when he states that maintaining the present status is not possible.Perhaps NPS should look for new management. If the GGNRA enforce new rules,I think the city of SF should consider retaking the area away from Federal Control. | | |

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| Correspondence ID: | 3504 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 20:09:18 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | As a Mexican-born San Francisco resident who has been walking my dogs at Ft. Funston for about a decade, I strongly object to the GGNRA's assertion (on page 281 of the DEIS) that dogs in GGNRA may present a barrier to GGNRA visitation by low-income people, Latinos and Asians. Every time I have visited Ft. Funston over a ten year period, I have seen a wide diversity of people recreating there. Many of the dog owners I see at | | |

Ft. Funston are Latinos, Asians and African Americans, and the people range in age from children to people in their 80s. In fact, I see a more diverse group of people at Ft. Funston than I have ever seen at national parks that do not allow dogs. I often bring visiting family and friends from Mexico to Ft. Funston to see what a wonderful place we have for people who like to walk out in this beautiful part of San Francisco with their dogs. The GGNRA is not a national park and it is not a pristine wilderness area. It is a recreation area. I oppose all of the proposed alternatives in the Draft Environmental Impact Statement, because they all are an attempt to change these areas from recreation areas into national parks, which is in direct contradiction to the mandate under which San Francisco granted these areas to the GGNRA. I support the 1979 pet policy and believe that new areas acquired by the GGNRA should also include large off-leash, voice controlled areas so that Bay Area residents and our dogs can recreate there.

Correspondence ID: 3505 **Project:** 11759 **Document:** 38106

Received: May,26,2011 20:09:26

Correspondence Type: Web Form

Correspondence: I have lived in SF for 17 years. I worked there for 28. I have lived in the east bay for 21 years. All of the time I lived in the city, and after, when I continued to work there, never a week went by that I did not take my dog to Fort Funston, or the Presidio. I was fortunate to be able to take my dog to work with me.

When I go into the city to visit friends, a trip to the beach, usually at the Presidio, is always on the list. The dogs are able to romp, while my friends and I have a bite to eat and chat.

I have watched over the years as more and more space is taken away from dogs and their stewards.

I am all for protecting wildlife, but that does include dogs. Dogs need open areas to run and get their energy out, not more enclosed, on-leash areas. Have you not seen the difference between letting a dog play with abandon and taking it for a walk on leash?

For years dogs and their people have enjoyed these special places, and yet somehow, these places still exist.

Have you ever noticed that dogs, and their people, are more than willing to include everyone else, the bird watchers, the joggers, the families, the bikers, the hikers, the kayakers, etc, but for some reason it is always the dogs that get excluded.

The majority of dogs that frequent GGNRA are well behaved.

As an east bay resident who frequents the city, and the GGNRA, I say leave these off leash areas alone.

LESLI ZEPHYR Richmond, Ca 94808

Correspondence ID: 3506 **Project:** 11759 **Document:** 38106
Received: May,26,2011 20:17:28
Correspondence Type: Web Form
Correspondence: I support Alternative C for the dog management plan at Fort Funston.

Correspondence ID: 3507 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Jessica Krakow

Correspondence ID: 3508 **Project:** 11759 **Document:** 38106

Received: May,26,2011 20:34:23

Correspondence Web Form

Type:

Correspondence: I am a 63 year old Native American and Native Californian. I cannot tell you how fed up I am with bureaucrats that have evolved over my lifetime into petty tyrants and over-lords. Who in the hell do you people think you are?

You have invented reasons for eliminating dogs from Fort Funston for years; when in reality your agenda is some perverted sense of environmental protection. Everyone knows it, and I am not going to be polite and couch my words in socially acceptable form. The lot of you is not worth one dog.

Try this: Get the hell out of my state. I hope I live long enough to see the size and scope of the Federal Government dramatically reduced and individual rights restored to America.

You people are Fascists. And the irony is that you believe you are possessed of a superior intellect and pious moral sense. Has God spoken directly to you lately? I'm just curious because the kind of arrogance you people exhibit is strangely like the Islamic Fascists.

And by the way, pass whatever law you want. If I want to walk my dog at Fort Funston, rest assured...I am going to do it.

Dennis Dehne

Correspondence ID: 3509 **Project:** 11759 **Document:** 38106

Received: May,26,2011 20:46:21

Correspondence Type: Web Form

Correspondence: I'm against the proposal of taking away off-leash right at the parks/areas proposed by GGNRA, for the forllowing reason:

1) Dogs are part of nature. It is against nature to take away the rights for them to enjoy the nature in those areas which are few left. Most of parks are either disallowing dogs be or they have to be leashed;

2) We have taken our dogs to Fort Fuston for 15 years. I never see any seriour problems. Most dog owners are doing their duty by cleaning up after their dogs. Sometime, a few dogs may bark or not friendly to each other. But, they are being dogs! As long as the owner still have control over their dogs, what is wrong?

3) I know certain areas have birds and they don't like to smell dogs. But, most dogs owners will command their dogs leave those areas alone, as long

as they are aware of it. On the other hand, why human have to get into the conflict between the birds and dogs? Are they in harmony before human get in the middle?

4) Should GGNRA also consider the health of dogs living in those areas? They need to meet and play each other to live in a well-behaved social manner. Without allowing them to run and play with each other will put extra stress on dogs and make them unfriendly! An unfriendly dog is not good for the environment.

5) If those parks adopt the new rules proposed by GGNRA, I'll probably end up taking my dogs walking on the street all the time!

Correspondence ID: 3510 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 25, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled,

minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Lynn R Miller

San Francisco, CA 94122

Correspondence ID: 3511 **Project:** 11759 **Document:** 38106

Received: May,26,2011 20:58:47

Correspondence Type: Web Form

Correspondence: As a regular visitor of Fort Funston, I support Alternative C dog leash plan.

The recent attack (and resultant death) of a dog by two pit bulls should be

a moment of reflection, though, for stricter leash laws.

Thank you for taking some action, however, in addressing the dog leash issue at Funston.

Correspondence ID: 3512 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: 27 May 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ?Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

?Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

?Exclude speculative, exaggerated, biased, or misleading statements and studies.

?Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

?Enable professional dog walking and align any professional dog walking rules with county or city regulations.

?Eliminate "compliance-based management," which would allow additional restrictions to be implemented without any public input.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the

original mandate for recreation upon which the GGNRA was founded. This misguided "solution" to the problems of endangered wildlife would only cause larger problems for the City of San Francisco, crowding the city parks with people who can no longer exercise their companion animals in the GGNRA. People, dogs and wildlife have coexisted peacefully in these areas for over three decades, and can continue to do so under the current regulations. Thank you in advance for not changing the policy. Sincerely,

Richard Malone San Francisco, CA 94116

Correspondence ID: 3513 **Project:** 11759 **Document:** 38106

Received:

May,26,2011 00:00:00

Correspondence Type:

Web Form

Correspondence:

-The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3514 **Project:** 11759 **Document:** 38106

Received:

May,26,2011 21:27:41

Correspondence Type:

Web Form

Correspondence:

I was bit by a dog in 2008 (11 stiches), had another rip up my kite. I saw a friend get bit by another dog when landing his hang glider. Recently a pit bull killed another dog. Dogs have gone into my day pack and stole my sandwich. I have also witnessed several times dogs pissing on my hang glider when laying on the ground assembled! It's very hard to not get feces on your shoes or bare feet! There are no bags available for dog poop. The constant smell is disgusting; I see dozens of dog walkers (commercial businesses!! how is that happening?) release their dogs and they first thing they do is squat and deficate right where I'm assembling my hang glider, the dog walkers cannot see every poop pile and 70% of the time they miss the pile. I basically like dogs but there are to many and the owners (a small number of them)just don't care or argue with you when you ask them nicely

to pick up the pile of feces. I support alternative C

respectly Tom Jensen Palo Alto

Correspondence ID: 3515 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 26 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. Please consider the above in your decision making process. Sincerely,

Miss Elizabeth Park San Francisco CA 94109

Correspondence ID: 3516 **Project:** 11759 **Document:** 38106
Received: May,26,2011 21:35:57
Correspondence Type: Web Form

Type:

Correspondence: I live locally and use the park daily. After reviewing your document I do not agree with the GGNRA's current preferred alternative as it restricts and eliminates off-leash dog walking in many areas within the park. I do not feel these changes will benefit anyone and is an attempt to change a long standing policy without sound science or long term monitoring of site specific conditions. I believe all government agencies should consider reasonable and balanced policies and GGNRA's alternatives seem to be excessive and very restricted towards dog walking. I favor an approach that balances all recreational uses including dog walking. GGNRA should partner with the local community to make the plan work, not assume an adversarial relationship which will lead to failure and reduced usage of the park for all. In closing, the current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and outreach as part of the overall program. Thank you

Correspondence ID: 3517 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: I am writing to urge the National Park Service to protect Golden Gate's wildlife from unregulated recreation. As the park should protect our natural and cultural resources, it should not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance and the compliance rate should be 95%, not 75% as outlined. The park should better accommodate everyone like runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation. Please require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Please limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely, Monica Roldan

Correspondence ID: 3518 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: May 27, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management

plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. As a long time resident and responsible dog owner I have always appreciated the Bay Area's welcoming of dogs who are supervised and maintained. I often go to Fort Funston and see people and dogs and hang gliders coexisting happily and respectfully. Please support active use of our parks.

Thank you, Joan Pettijohn San Francisco, CA 94110

Correspondence ID: 3519 **Project:** 11759 **Document:** 38106

Received: May,26,2011 21:59:45

Correspondence Type: Web Form

Correspondence: I am writing to ask you to stop the Golden Gate National Recreation Area from implementing its dog management plan.

I am a long time dog owner, trainer, part time pet sitter, and foster mom to dogs in need. I also consider myself an environmentalist and conservationist. I have been walking Mori Point almost daily for 20 years; nine years with my previous dog and 11 years with my current dog. Dogs and people both require daily exercise and I can tell you, the people I meet daily at the beach are usually dog owners. Ever since GGNRA took over Mori Point there are now some fair weather fans that come out only on a nice sunny day. Trust me, for 20 years, it's the dog owners that are down at Mori Point, rain, fog, wind, or sun.

My friends come from Castro Valley, Redwood City, San Bruno just to walk their dogs. It is such a sense of community walking Mori Point and at times it's my meditation after a hards day work. Working with dogs, there are more dogs than you may realize that do not do well in dog parks. My dog has been bullied in dog parks and hence will not go in them without hiding under a park bench. She is wonderful off leash running free and it's a true pleasure to watch.

Dogs without proper exercise can end up with behavioral problems which

may mean dropping a dog off at the shelter. I also volunteer at the Peninsula Humane Society and they surely don't need more dogs in their shelter. People also need daily exercise, and some people wouldn't even be out walking if it wasn't for their dogs. As you know there are health benefits from daily exercise, such as weight loss, controlling blood sugar and cholesterol, as well as mental benefits.

I want you to know also, that my friend and I were walking Mori Point with our dogs and had to rescue a rabbit that had its leg stuck on the rope that GGNRA put up to keep dogs and people out. Our dogs watched with interest as we saved the little bunny and it hopped away free. No dog hurt the bunny, but material that GGNRA put up to keep us out now, hurt the bunny and thank goodness we got there when we did.

Thank you for listening.

Sue Isonio

Correspondence ID: 3520 **Project:** 11759 **Document:** 38106
Received: May,26,2011 22:00:35
Correspondence Type: Web Form
Correspondence: May 25, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, I am a senior, age 71 years and enjoy going to Fort Funston daily. I walk my small dogs without fear of street crime, robbery or roaming gangs in search for an easy target. I have met many seniors as well as families, joggers, and strolling folks with and without dogs while on my walks. I have formed friendships that show the Fort Funston area to be a community of caring and environmental savvy folks. Seniors like myself need exercise availability that is local and safe. Walking with our pets gives us the opportunity to socialize, enjoy the outdoors, and stay healthy. Dogs that are off leash also benefit by exercise not afforded by strict leash walking. Many of us seniors are members of the clean up teams, and will pick up litter not disposed of correctly. I frequent Fort Funston, but the pleas can be heard at all of the GGNRA sites. "Please don't limit off leash dog walking in the areas that now allow it."

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon

sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Barbara Tessorerie _Daly City, Ca 94015

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| | | | |
|-----------------------------|----------------------|-----------------------|------------------------|
| Correspondence ID: | 3521 | Project: 11759 | Document: 38106 |
| Received: | May,26,2011 22:03:19 | | |
| Correspondence Type: | Web Form | | |

Correspondence: Whenever I've visited San Francisco (often), I have enjoyed going to Ft. Funston with my friends and their dog. It's been wonderful to experience the dog-lovers camaraderie. I admired San Francisco, specifically because of the way dog owners and dog lovers were treated, and how the space of Ft. Funston was so inclusive that way.

I do hope the use of the space for owners and their dogs will be continued.

Ruthie Levikoff

Correspondence ID: 3522 **Project:** 11759 **Document:** 38106

Received:

May,26,2011 22:03:21

Correspondence Type:

Web Form

Correspondence:

To Whom it may concern, Regarding closing off Fort Funston to off leash dogs, I hope you will continue to honor the 1979 Pet Policy. I can't tell you how many people and their dogs will be heartbroken if you restrict off leash dogs. The reasons for closing don't make sense. I see horses tromping through there causing more damage than dogs and their riders don't even pick up their droppings! I personally pick up trash on the beach while my dogs run and play. I never see any problems once so ever, just dogs having the time of their life. There are too few places to take dogs in the city (or bay area, for that matter) and this is one place with lots of space for them to run off steam. Please reconsider your decision, and I speak for my friends without dogs also, who love to go there just to watch the dogs having such a good time. I am a senior citizen and need a safe place to take my dogs. Thank you Lucie Williams

Correspondence ID: 3523 **Project:** 11759 **Document:** 38106

Received:

May,26,2011 22:07:39

Correspondence Type:

Web Form

Correspondence:

As a senior citizen with a dog, I have watched the park service take away more and more of my traditional dogwalking space. Spaces, I might add, that have been used for a century for this purpose, and these are the sorts of purposes the Park Service agreed to preserve when it was given the land.

Please keep this agreement, and allow dogwalking (including offleash walking) throughout the GGNRA.

Correspondence ID: 3524 **Project:** 11759 **Document:** 38106

Received:

May,26,2011 22:11:09

Correspondence Type:

Web Form

Type:

Correspondence: I grew up in San Bruno, moved away for about 20 years, and then returned about 8 years ago. Having lived in many other parts of the US, it became clear to me that one of the most unique and special things about the Bay Area is the many open spaces that allow dogs to run free. In EVERY other place I have lived (including Los Angeles, Austin, Boston, Columbus, OH and St. Pete, FL - yes, that's a lot!) it was extremely difficult to be a dog owner. It was nearly impossible to find any place to take a dog to run.

Having a place like the Bay Area where dogs have those spaces truly something that sets us apart. Having great places to take dogs is SUCH an important part of creating the amazing quality of life in the Bay Area.

I fully understand the need for some places to be free of dogs, and I completely support that as PART of the plan. But please don't whittle down what space is left in the name of making every open space adhere to the same plan just for the sake of it. Or worse, please don't limit the spaces to punish those few dog owners who are not responsible. People like me who take a dog out frequently know that incidents of dog owners not cleaning up or allowing aggressive dogs to behave badly are VERY infrequent. They are so rare that if they do happen, all the dog owners are shocked and determined to prevent further incidents.

We MUST maintain some places for dogs to run free. Our open policy (in some areas only) will assure that we maintain this unique and wonderful quality of living in the amazing Bay Area. Thanks very much for your efforts.

FYI, I've visited many open areas with my dog, and the areas I favor most are Chrissy Field and Fort Funston. I feel that Fort Funston is the most important area to save and Chrissy Field is also very important.

Correspondence ID: 3525 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean:

I am writing as a concered citizen regarding the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area. I use and enjoy the GGNRA lands, and am concerned about impacts from dog-related recreation on the wildlife, habitats, and other park users in the area.

I strongly encourage you to improve the plan by implementing the

following:

1. All Regulated Off-Leash Areas should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. Fences provide more security for all park users and create clearer boundaries so that dog owners are aware of how to comply with existing park rules.
2. The Park Service's proposed requirement of 75% compliance is too low. The Service should require a minimum of 95% compliance before initiating measures to improve compliance.
3. Commercial dog-walking should not be permitted at the GGNRA. This is a commercial activity, and thus the Park Service cannot legally permit it.
4. Certain trails in San Francisco should be entirely closed to dog-use. Under the current plan, nearly every trail in San Francisco is open to on-leash dogs, leaving 0 trails available to public use without the presence of dogs.
5. While dogs are an important part of our communities, they are domestic creatures that are having a significant negative impact on thousands of other animals and plants that rely on the park to survive, including some threatened and endangered species. The parks should be maintained to be safe and accessibly for all users and to protect our cultural and natural resources for future generations.

Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measure possible to protect the National Park's vulnerable resources for everyone.

Thank you,

Carolyn Kolka

Correspondence ID: 3526 **Project:** 11759 **Document:** 38106

Received: May,26,2011 22:21:03

Correspondence Type: Web Form

Correspondence: I am horrified and in shock that we actually have to fight for this issue. I would have never saved a dog if I knew this would be our future. I practically live on the beach at Fort Funston. I check the tides daily as my routine. I take my Sophie to Golden Gate Park, Baker Beach, the Marina, and McLauren Park. This are where she gets to run free and I can get a piece of mind. I don't ever recall any confrontations with the public. The people who get to frequent and enjoy these places are dog owners. It is what makes

San Francisco so special to have a dog here. Please don't change a good thing. Crazy for Dogs, Dr. Julie Trestman, D.C.

Correspondence ID: 3527 **Project:** 11759 **Document:** 38106

Received: May,26,2011 22:26:22

Correspondence Type: Web Form

Correspondence: I want you to know that we are huge fans of the GGNRA beaches and believe that you have done a great job. We used to brag about the fact that we are off-leash and even had conversations with people from Southern California that thought it was so cool that we had our dogs off leash. It is such a great day to watch kids and dogs and adults bask in the sun together. So American!

However, as a California native I have to say I am blown away that I am even writing this. As a kid, I grew up on the beach in Pacifica (literally we lived on Pedro Point on the rocks). Off-leash was not in our vocabulary because we all just hung out on the beach with our dogs and our families. Kind of like what happens at Baker & Muir all summer long for us. We just hang out. I honestly thought the one group of people that I could count on not becoming "big brother" would be the parks. If the off leash beaches are taken from us We will never vote for another tax increase for one of your parks again. We will no longer donate money to them and we will seriously consider taking our tax money anywhere but the areas that you have robbed this from us.

No wonder people want to leave California in droves. We are destroying it from within. Please remember who pays your salary, taxpayers! For goodness sake, we even pay tax on dog food. That means that you work for our dogs if you want to get down to the brass tacks. So, I strongly encourage you to stop thinking about your insurance policies and liabilities and actually serve the people.

It is time to stand up and say enough is enough to all of these regulations. We all just want to live our lives and stop the ridiculous amount of rules.

Please keep the off leash areas as they are!

Correspondence ID: 3528 **Project:** 11759 **Document:** 38106

Received: May,26,2011 22:38:46

Correspondence Type: Web Form

Correspondence: I am not a minority, just a 61 year old wife and mom. My husband and I have lost our business, in downtown Napa-retail Golf- and our house as we

speak. We splurge, 2 bridge tolls and fuel to SF, a weekend or two a month to visit Crissy Field beach with our dog. He (we) enjoy the beach along with a sandwich from the nearby Safeway. Everyone picks up after their dog, no dogs go in the fenced area. All of us just enjoy the view and the freedom, use the restroom and drive home to return to our jobs. Please let us continue the small freedom that the off lease beach gives us as we struggle to maintain dignity working (luckily my husband and I have hourly paid jobs still) hard.

Correspondence ID: 3529 **Project:** 11759 **Document:** 38106

Received: May,26,2011 22:43:12

Correspondence Type: Web Form

Correspondence: I walks my two small dogs on the bluff trail at Mori point nearly every days. I enjoy the views so much, and there is never anyones else there on that trail. We are no trouble or bother to anyone. It is so close to my home -- I cannot travel further to exercise my little dogs.

Why does the Federal Government want to take this enjoyment away from me? I'm harming no-one. Why? They tell me this, I nearly cry. I cannot understand....

Correspondence ID: 3530 **Project:** 11759 **Document:** 38106

Received: May,26,2011 22:57:38

Correspondence Type: Web Form

Correspondence: I am very upset with the GGNRA, I will never give you money or help you out. The GGNRA lands were given for recreational use. That included owners with their dogs off leash so they both could exercise. You are now taking that away from dog owners. I also live in Pacifica, and we don't have a dog park, or any legal off leash areas, and the little we have you are taking away from us. Dogs need to exercise and socialize. My dog barks less and gets along better with other dogs because she gets lots of exercise. It's interesting that you are limiting dogs as if they do damage, and yet what about people, and their trash, and their damage that they do to the environment. San Francisco teach GGNRA a lesson, take back the land, and keep it dog and people friendly. GGNRA have you not heard that dogs are man's and woman's best friend, but I guess you don't own any dogs or animals for that matter. You are to selfish.

Shame on you GGNRA, Your Karma will come back to haunt you for your evil deeds.

Correspondence ID: 3531 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 23:03:34

Correspondence Web Form

Type:

Correspondence: Dear GGNRA:

I am writing on behalf of my dog, Roxie, to tell you that your proposed dog management plan is far too restrictive and unfair. Parks should be for all, including dogs and dog owners. Dogs that have the opportunity to get plenty of proper (off leash) exercise are better behaved dogs overall. Your proposed plan goes too far, and we object with all our bark. We are also very concerned about the impact such a restrictive plan would have on local parks that do currently have off leash dog runs. Overcrowding at local parks would be a serious consequence to this extreme plan. Please hear our voices and reconsider.

Correspondence 3532 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 23:17:50

Correspondence Web Form

Type:

Correspondence: Please preserve Ft. Funston park for people like me my wife and my adult daughter to walk our dogs off-leash. There is nowhere else. Golden Gate Park in SF has place for dogs off-leash, but they are small patches of dirt, no fit place for people to walk and enjoy dogs off leash. Ft. Funston is unique, and there is no reason to believe that the population at large cannot safely come and enjoy it also. Off-leash, dogs tend to be very sweet, and the people are very friendly. There is only this one place on the entire San Francisco area that I know of like this, it has natural beauty and a wonderful peacefulness for dog lovers. Park planning is a proper function of government, and this is the proper place to reserve for off-leash dogs just as it has served this area for years.

Thank you very much for all support for keeping Ft. Funston open for woalking dogs off-leash.

sincerely,

Robert Feinglass, Esq.

Correspondence 3533 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 23:22:10

Correspondence Web Form

Type:

Correspondence: Dear Mr. Dean, My name is Amanda and I live in the Castro with my two

dogs, Dutch and Pug. Together we visit Crissy Field or Ft Funston 5 days a week - sometimes more - and have been for the past 4 years.

Even though there is a small dog park 2 blocks from my home, and a city park 2 blocks in the other direction, I prefer to drive to the GGNRA lands for a few reasons.

1) I'm an active person and love the outdoors. I enjoy hiking with my dogs, not sitting on a bench in a small enclosure.

2) My pug has been injured 3 times by dogs at the local dog park. It's a small, enclosed space with a lot of dogs and things often get out of hand. We have never had problems with aggressive dogs at open-spaces.

3) My Dalmatian has been to the vet twice after visiting the city park near our home (Dolores Park). Once for eating chicken bones someone didn't bother to throw in a garbage can, once after being attacked by an unneutered male dog. In the hundreds of times we've gone to GGNRA dog areas, I have seen ONE dog-on-dog attack that ended in blood. Kind of amazing, really, given the # of dogs that visit the area on a daily basis.

4) I have a brain injury and have trouble with the "social scene" at the dog park. Hiking alone with my dogs in open spaces is one of the few times I can forget about my disability and just... be.

While I agree that some places (like the heavily human-populated section of East Beach) are not suitable for off-leash dogs, and do agree that professional dog walkers be regulated and restricted, I don't think the proposed changes take the reality of our city's dog population into account.

I also understand the desire to reduce environmental impact on GGNRA lands. My pug is the famous "Green Pug" (<http://www.youtube.com/watch?v=yKoLBSK8SSE>) of the viral Earth Day video. Environmental issues are important to me, but making dogs public enemy #1 of the environment is a bit of a stretch. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be

modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely,

Amanda, Dutch and Pug

SF, CA 94114

Correspondence ID: 3534 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 26, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, Hi my name is Emma Elizalde and I live in Forest Hill in San Francisco. I use Crissy Field to walk my dog at least once a week. With my old dog we used to take her to Fort Funston daily. I understand that you may think I am an "anti=environmentalist" but I would have to disagree. Along with donating to the Sierra Club and being on their mailing list, I also take my part in trying to make the environment a better place. Not only do I try to make the environment a better place but I also try to surround myself in nature. As much as I love Crissy Field, I wouldn't go as often if I wasn't able to walk my dog. These environmental walking locations exist for people to enjoy and part of people's enjoyment of the land is by sharing it with their pets. I am also half Ecuadorian and enjoy the Crissy Field and Fort Funston because of the off-leash dog aspect. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider

reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Emma Elizalde San Francisco, CA 94116

Correspondence ID: 3535 **Project:** 11759 **Document:** 38106

Received: May,26,2011 23:28:57

Correspondence Type: Web Form

Correspondence: I agree with the current preferred alternative dog managment plan.

I take my granddaughter to swim lessons in the Presidio near Crissy Field and the off-leash dogs are a problem for myself and my young grandchild.

We would love to stay for picnis after her lessons or just to play and walk but it is difficult when off leash dogs run up to her and they are her size or larger. It is frightening to her and I am afraid I cannot handle any difficulties that may arise from dogs off leash and away from their owner.

We would spend more time visiting the GGNRA if the dogs were kept "at bay".

Thank you.

Correspondence ID: 3536 **Project:** 11759 **Document:** 38106

Received: May,26,2011 23:37:54

Correspondence Type: Web Form

Correspondence: To Whom It May Concern,

I hope you will consider keeping off-leash space in the GGNRA available for the use of pets and their owners. While problem dogs (and their negligent owners) are of course a very legitimate concern, changing the law will not dissuade these people. They will be there with their dogs no matter what any law says. Unfortunately the people that will be affected are the conscientious dog owners who will no longer have a healthy and pleasant way to exercise and enjoy Crissy Field, Fort Mason, and the rest of the GGNRA alongside their dogs. While problem dogs need to be dealt with, by other dog owners and by park law enforcement, it should be remembered that a well behaved, happy dog is often a great enjoyment and source of happiness park visitors, even those unaccompanied by a dog of their own.

Thank you so much,

Jeff (and Mimi)

Correspondence ID: 3537 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Web Form

Correspondence: My name is Katie and I live in Cole Valley. I have been living in San Francisco for almost 4 years. The first thing I did when I drove my car over the Bay Bridge into San Francisco at the end of a week long move via road trip from Pennsylvania was take my dog to Fort Funston. That is where my Aunt and Uncle, who have lived in the Inner Sunset for over 25 years and who also share my views about the GGNRA proposal, suggested I go as my first stop. I didn't stop at their house to unload my things or even use the restroom, I went straight to Funston. My dog who had spent most of the previous week in the back of the car and had been so anxious that he wouldn't even eat, was in heaven. I have never seen him so happy.

I do not go out to bars, or parties, or clubs, I go to Funston. It is what informs most of my opinion of San Francisco. If you take away Funston and keep me from enjoying it as I do now with my dog, I will lose my faith in the City, and it will hold little value for me. Being a PTSD survivor, walking off-leash at Funston with my dog keeps me sane and it keeps me happy. It keeps me from having to take psychiatric meds. It keeps me 20 lbs

lighter than my normal set point. It keeps me social.

Limiting the areas where dogs are now allowed will greatly diminish all these blessings if not completely destroy them.

I love being outside and enjoying the environment with my dog. I am a responsible user of the park and clean up and pick up trash whenever I see it. Most of the damage that I see being done, specifically erosion, is done by kids. But I want them to enjoy the park as well. They shouldn't have to be leashed at Funston and neither should well behaved dogs.

There are simple solutions to the problems that you say could be an issue in the future (since you weren't able to prove that they were indeed problems that need to be addressed. If you had taken the money spent on this ridiculous study and used it to maintain the fencing and paid for additional enforcement of the current boundaries, we would not be here today. Start spending all your time, effort and financial resources on what matters. Do the job you were hired to do.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action

alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration.

Correspondence ID: 3538 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/26

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other

recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely, Devlin Hennessy

Correspondence ID: 3539 **Project:** 11759 **Document:** 38106

Received: May,26,2011 23:49:23

Correspondence Type: Web Form

Type:

Correspondence: The current off leash parks are invaluable to dog owners like me. They provide open space for dogs socialize with other dogs as well as humans. I frequently use areas like Fort Funston, Baker's Beach and Crissy Field, which have "trails" to provide for better exercise for me and my dogs. The terrains are more natural for animals than fenced areas. These areas are often cleaned up by dog owners/volunteers at no cost to the state. I have not encounter any aggressive animals. Animals and owners who go to these areas are friendly and have great respect in preserving the environment at its best.

The current Golden Gate National Recreation Areas (GGNRA) as it is operating make it our city distinctive that no other place provide. I often meet people who come from around the bay area just to see the vast variety of dogs as well as to enjoy nature.

Please do not eliminate or redefine these areas. It is an asset that uniquely sets the bay area apart from other locations.

Correspondence ID: 3540 **Project:** 11759 **Document:** 38106

Received: May,26,2011 23:50:38

Correspondence Type: Web Form

Type:

Correspondence: I am a careful responsible owner of a small dog and cherish the openness, safety and freedom of Fort Funston, Crissy Field and parts of Marin GGNRA. My husband and I are also avid birders who support Pt. Reyes

Field Seminars, Auduban Society, and regularly do birding along Crissy Field, in the Presidio, Bolinas and Sunday guided birding in Golden Gate Park. I have never witnessed episodes of dogs giving chase or disturbing the flora/fauna/bird nesting sites in these areas. I understand the Barn Swallows have slightly relocated further up the shore at Fort Funston, are doing well, and a new threat to that population is the Raven's collecting at the beach, noy people or their dogs.

We all share these beautiful open spaces...dogs, hikers, birds, birders, cyclists, surfers, kite users, families, old/young people. The vast majority of dog owners are responsible and respectful about keeping their dogs under voice or leash control as needed, and cleaning up any feces when it is deposited. I wonder if the environmental impact of other mentioned groups has also been under study, since we share the realization that we all have responsibility to minimally impact the environment we share together.

I respectfully request that due consideration be given to the value of the exercise that people, their dogs, and other hikers obtain under the current conditions of areas which allow us the freedom to share exercise in open space with our animals. This has been working well, in my opinion, since the 1970's and I have seen no documentation that warrants the severe restrictions currently under consideration.

Please allow us to maintain substantial open off-leash areas for dogs and their owners as has been occurring for the past several decades. People and their animals need and deserve areas supporting exercise and physical freedom. With improved signage and reminders about protocol in these areas, the vast majority of people would respond with respectful compliance, allowing us to continue use of these areas as responsible land stewards as well as pet caregivers.

Thank You.

Correspondence ID: 3541 **Project:** 11759 **Document:** 38106

Received: May,26,2011 23:57:43

Correspondence Type: Web Form

Correspondence: We are extremely responsible dog owners and have been for over 20yrs of our living at Ocean Beach. One of our dogs would chase birds and other dogs for that matter so she is always on leash and the other dog could care less and just likes to walk along and sniff sand dollars. We pick up after our dog and pick up garbage with left over bags we have with us. We also go to Fort Funston on a regular basis and the same rules apply for us there. Please keep these areas leash free. Thank you for reading!

Correspondence ID: 3542 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Golden Gate National Recreation Area is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

It is critical to protect these species and other protected wildlife. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

There are some critical steps to improve the situation for visitors and endangered and other wildlife:

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 3543 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional

restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

Our family has been walking our dogs off leash almost every weekend at Fort Funston and Ocean beach for several years now. This is an activity that we enjoy as a family that includes our 2 dogs adopted from rescue group and animal shelter. This is a recreation activity that helps us and our dogs stay healthy and happy. Whenever we go out there with our dogs we meet a lot of people who share the same sentiment about walking with their dogs. We can see how happy they are to be there and how much they enjoy exercising and bonding with their dogs in their smiles and expressions. This is a recreation that benefits both people and their dogs tremendously and even the people with limited means can participate which makes this resource so valuable. So even though we now live in San Jose, we still drive to these places to enjoy walking off leash with our dogs. I really hope that you will consider how much having these off leash areas in GGNRA benefits so many countless people and their dogs and do not make changes that will take away the joy and happiness for a lot of people. Sincerely,

Giny Woo

Correspondence ID: 3544 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: This park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals.

Correspondence ID: 3545 **Project:** 11759 **Document:** 38106
Received: May,27,2011 01:09:37
Correspondence Type: Web Form
Correspondence: Draft Dog Management Plan, Draft Environmental Impact Statement

Dear GGNRA, My name is Amy Murata, age 36, I am a dog owner and a voting resident of District 5. I returned to my native California from 13 years living on the East Coast. I specifically chose to live and pay taxes in

San Francisco because of the incredible lifestyle our beautiful city affords us. The most attractive feature of our city is the ability to share it with our canine companions. The ability to enjoy the Golden Gate National Recreation Area (GGNRA) areas OFF-LEASH with my six month old Boxer, Olive, is a key feature of the extremely high quality of life that me and other responsible dog owners in San Francisco enjoy. Olive, like the overwhelming majority of other dogs who enjoy the GGNRA off-leash is completely under voice control and serves as San Francisco's best advertisement for the great lifestyle in San Francisco. I have wanted to get my own dog for over 10 years and I held off on doing so because I wanted to ensure that I lived in an environment in which my dog and I could thrive. I waited until I moved to San Francisco because the high quality of life offered by the off leash areas of the GGNRA and San Mateo County. My dog visits Fort Funston seven days a week and she also visits Crissy Field, Alamo Square, Buena Vista Park, and Duboce Park on a regular basis. I'd like to take this opportunity make a few points in opposition to the Draft Environmental Impact Statement (DEIS) for a new Dog Management Plan as it is currently written. Of note, the DEIS is comprised of a shocking number of assumptions which are not supported by facts or evidence. Many of the impacts are simply assumptions of things that "could" or "may" happen. These are not fact-based examples. The overwhelming number of dog owners and dog walkers are extremely responsible for the actions of the dogs within their care and I have never witnessed an incident in which a dog owner/walker has ever caused harm or negatively impacted another fellow citizen's GGNRA experience. As a citizen, I would hope that a decision that would impact so many people and dogs would be based in facts.

With regard to safety of other citizens who share GGNRA with other dog owners/walkers like myself, I would just like to highlight a misleading and flawed statement in the DEIS which erroneously suggests that eliminating off-leash areas within the GGNRA/San Mateo County would increase public safety. In fact, the data provided by GGNRA states that dogs account for only 2% of serious safety incidents involved dogs. Of note, the vast majority of serious incidents involved people only, no dogs. If non-serious safety incidents are included, dogs accounted for only 7% of the incidents in the GGNRA. Finally, I would like to say that a compliance-based Management Strategy cannot be part of any plan for the GGNRA. Doing so would punish responsible dog owners like me and other voting dog owners for the bad actions of a few irresponsible owners. Further, I am also strongly opposed to Preferred Alternative because of its restrictive nature. There is no justification offered in the DEIS for major changes. I fully support the formalization of the 1979 Pet Policy AND off-leash access in San Mateo County AND on new lands acquired by the GGNRA. We vote, own homes/businesses, pay taxes, and take responsible care of our dogs. Respectfully,

Amy K. Murata

copies sent to: Frank Dean, General Superintendent, GGNRA Secretary Ken Salazar, Department of the Interior Christine Lehnertz, Regional Director, National Park Service, Pacific West Region Jon Jarvis, Director National Park Service Nancy Pelosi, Member, U.S. House of Representatives Jackie Speier, Member, U.S. House of Representatives Diane Feinstein, U.S. Senator Barbara Boxer, U.S. Senator State Senator Leland Yee State Senator Mark Leno email copies sent to: Mayor Ed Lee Distric 5 Supervisor, Ross Mirkarimi fortfunstondog.org sfdog.org crissyfielddog

Correspondence ID: 3546 **Project:** 11759 **Document:** 38106

Received: May,27,2011 01:29:29

Correspondence Type: Web Form

Correspondence: I'm writing to urge you to vote against the GGNRA's dog management plan, specifically to preserve Fort Funston as a haven for San Francisco dogs. The issue of balancing human use and environmental concern in urban parks is a complex one, but considering the massive demand for and wild success of parks like Fort Funston, the environmental detriment is relatively insignificant. Fort Funston is a shining example of a functional urban park, in large part due its use by dogs and dog walkers. Advocates of the proposal would paint Fort Funston as a little swath of the Old West, ruled by anarchy, inaccessible to anyone but dog walkers. While the Chronicle had its eye on this issue, the Letters to the Editor section was rife with anecdotes of dog-related irritations and safety concerns from parents of young children. Yes, there have been dogfights and human conflict, as is to be expected in so heavily used an area, but Fort Funston is actually remarkably safe because of the presence of dogs, which diminishes the safely concerns so prevalent in other urban parks. Drug abusers, muggers, pedophiles, homeless encampments and other issues which pose a safety risk to demographics like children, the disabled, the elderly and women alone are massively deterred by the flocks of romping dogs. In my years visiting Fort Funston as a child and teenage girl, I've never had the sort of frightening or uncomfortable encounter I might have at, say, Golden Gate Park. The sense of security, the geniality of the dedicated dog owners who frequent the park, and the network of wide paved trails make the park a great place for anyone who can stand the company of dogs to visit. Whether you come to tire your dog out among the dunes or to enjoy the spectacular view of the ocean, Fort Funston has never been anything but peaceful and joyous. On the other side of the equation is the desire to restore as much land as possible to its natural, original state. Those who advocate the plan for this reason don't often mention that Fort Funston is hardly a virgin wilderness. It's a military base--paved over, tunnelled out and seeded densely with invasive iceplant. Considering how oft-used and human-appropriated the land is, one might as

well attempt to restore a children's playground or a high school football field to its natural state. As long as there must be some land in the city to meet dog owners' needs--and there must--Fort Funston is absolutely ideal. Yes, dogs are a detriment to what functional habitat is there. We've seen the figures about the drop in the populations of endangered birds, but never has this data been compared to the population drop in areas without offleash access. What data we do have indicates that the vast majority of environmental impact is caused by humans, not dogs. Moreover, curtailing dog use could incur some of the aforementioned human elements residing in other urban parks, such as homeless encampments, which are as much if not more an obstacle to restoration. In short, the potential environmental benefit in this case is not significant enough to justify limiting the use of such a fantastic and much-needed park. Once again, I urge the board to vote no.

Correspondence ID: 3547 **Project:** 11759 **Document:** 38106

Received: May,27,2011 01:34:59

Correspondence Type: Web Form

Correspondence: Dear GGNRA or whom it may concern,

I am a regular walker at Fort Funston and support Alternative 'C'. Some of the dogs are very scary and should not be off leash all over the Park. The dogs impact my walking . They scare me when they run at me.

Correspondence ID: 3548 **Project:** 11759 **Document:** 38106

Received: May,27,2011 01:47:01

Correspondence Type: Web Form

Correspondence: I strongly prefer that the Marin Headlands Trails of Tennessee Valley, Coastal Trail, Coyote Ridge and Miwok Trails exclude dogs. I also strongly prefer that dogs not be allowed on Muir Beach, and that they be on leash at Stinson Beach and/or the beach is divided into two sections, with one being dogs allowed and one being dogs not allowed. This would need to be clearly posted and enforced to ensure that dogs don't wander to the wrong side and that dog owners understand the rules.

My stance comes as a result of several incidences over the years of dogs approaching us in a threatening way. We have had the experience, on more than one occasion, of off-leash dogs growling and baring their teeth and charging at us and our on-leash dog who was not evoking a challenge. We have children and felt that their safety was in immediate peril. One time on the Miwok Trail, I was terrified, especially since the dog owner was claiming his dogs were nice, even while they growled and charged at us. Many owners like him have claimed their dogs are harmless, even as their

dogs displayed behavior to the contrary, and they refused to leash the dogs even though it was supposed to be an on-leash trail. I feel that the on-leash rule almost never works, since no one is there to enforce it. I cannot go on a relaxing hike if I have to be the one to contend with those who do not respect the rules nor my right to feel secure. On the main Tennessee Valley trail, where dogs are not allowed at all, I have never had a problem and have only seen a dog once. It seems obvious that people will not bring dogs if they are not allowed at all and this rule is clearly posted. But if the rules are confusing or if they are more lenient, such as if on-leash is okay, then it seems a majority of people will let their dogs off-leash, and perhaps just carry the leash separately. I have seen this more times than not. If I politely ask them to put their dog on a leash while they pass us, the response is typically that their dog is harmless, and they would rather argue and defend their dog's character than to comply with the rule and my request. It seems the only way to change this would be to not allow dogs in those areas. It has been hard to relax at Muir Beach with so many dogs running loose, including dogs of breeds that are statistically more likely to seriously injure people. I want to be able to go to this beach and relax and not worry about being bothered by dogs nor worry about my children's safety. It's sad, but this is the one and only reason I haven't gone to this beach in a long time, and I should be able to go and feel safe since this is our nearest beach. Please consider that hikers, runners, beach-goers should be allowed a good number of beautiful trails and beaches where they can enjoy nature and not have to deal with dogs. The dogs have plenty of places to enjoy, it seems that with the way the rules are now, they are held in higher regard than those of us who want dog-free options.

Correspondence ID: 3549 **Project:** 11759 **Document:** 38106
Received: May,27,2011 02:10:55
Correspondence Type: Web Form
Correspondence: Fort Funston is the Statue of LIberty of San Francisco dog life. It makes an elegant statement that dogs, birds, bikes, joggers, hang gliders, kids, people can get a long. Not unexpectedly there are people and dogs in the infinitesimal minority that mess things up!

Correspondence ID: 3550 **Project:** 11759 **Document:** 38106
Received: May,27,2011 02:21:29
Correspondence Type: Web Form
Correspondence: To Frank Dean, General Superintendent, GGNRA

Dear Mr. Dean,

I have lived in San Francisco for almost 40 years. Although I am not currently a dog owner, I was previously one for almost 14 of the years that I have lived in San Francisco. As a dog owner, I regularly walked my dog off leash in the Presidio during the week and at Fort Funston or Crissy Field on weekends. The walks, which occurred rain or shine and usually with dog owner friends, were healthy, fun, and sociable for the dogs and humans. We controlled our dogs, cleaned up after them, and never had any confrontations with hikers, bicyclists, horseback riders, or children, although we encountered all of them.

In fact, I have a young daughter who would love for me to get another dog. And I would love for her to learn the responsibility of caring for a dog and to be able to enjoy off-leash dog walking, especially in a natural place as magnificent as the GGNRA. But the DEIS causes me great concern for my daughter, myself, and all off-leash dogwalkers in the Bay Area.

I am dismayed at and opposed to the GGNRA's current preferred alternative because of the unreasonable restrictions it puts on off-leash dog walking in the GGNRA. The proposed changes are unwarranted, unnecessary, and not based upon sound science.

Lest you think that I don't care about the environment, please be advised that I am a member of the Sierra Club (Life Member), Defenders of Wildlife, Earthjustice, Environmental Defense Fund, National Wildlife Federation, and California Trout. As an environmentalist, I naturally care about protecting the GGNRA's land, vegetation, and wildlife. But I do not that believe off-leash dog walking and protecting the environment are incompatible.

The thrust of the GGNRA's proposal is to punish all dog walkers for the conduct of a few. Yes, I admit there are some inconsiderate dog walkers. But why don't we focus on educating them, protecting sensitive vegetation (with signs, fences, etc.), and, if necessary, punishing those who cause problems. But let's not punish all dog walkers because of the conduct of a few.

There are also inconsiderate bicyclists, hikers, pedestrians, and car drivers. Should people in all of those categories be similarly restricted as off-leash dog walkers in their use of the GGNRA?

The GGNRA is an urban park. Its purpose was to provide open space for recreation. Off-leash dog walking is as much a form of recreation as any other use made of the GGNRA. I also hike, bike, and walk in the GGNRA, but those activities are not any more a form of recreation than is off-leash dog walking. The DEIS fails to address how dog walking recreation is

affected.

I urge the GGNRA to adopt a modified Alternative A (the No Action alternative). The current plan should be modified to provide clearer rules, more signage, improved vegetation barriers, and education and outreach as part of the overall program. Unwarranted restrictions on off-leash dog walking should not be imposed.

Thank you for your time and consideration of my comments.

Clifford Liehe San Francisco, CA 94118

Correspondence ID: 3551 **Project:** 11759 **Document:** 38106

Received: May,27,2011 02:29:51

Correspondence Type: Web Form

Correspondence: My husband and I are members of Audubon, Wildcare, The Sierra Club and other wildlife organizations. We also own two dogs. We feel very strongly that there is enough land for all users, providing they are responsible, which is a problem for everyone, not just dog owners. Speeding bikers, bikers on prohibited trails, people leaving trash etc. are just a few of the other problems. We strongly support no dogs in critical breeding grounds, leashed dogs in some areas and no dogs in other areas. However, as with the debate with MCOSED, we also believe that dog owners should be allowed to use a part of these lands with their off-leash dogs.

One of the places we have been taking our dogs for years is Oakwood Valley. We have never witnessed one dog-related incident detrimental to wildlife or humans in the 20+ years we have been walking there with our unleashed dogs. We understand dogs are only allowed on 0.5% of all GGNRA land. On MCOSED dogs are only allowed on about 6% of the land. We have witnessed the following...birders and plants seekers going off trail in large groups to look into nests, pish for birds, pick flowers etc. Is that not also disturbing to animals?

Walking your dogs off-leash is so nice for both the owner and the dogs. We look at wildflowers and birds and they smell doggie things and run through mud puddles. When we see someone coming we call them to our side until we know it is a good situation for all. We don't see much wildlife on the fireroads and trails heavily used by bikers, walkers, birders, and dog owners. They stay in the more remote parts of the land where there is less human impact. Also, many people cannot walk their dogs on leash due to a disability so this would end all walks for them.

One of the main reasons for loss of wildlife is habitat loss. One of us

volunteers at WildCare and most of the injured birds and mammals that are brought in are the result of cars, gunshots and collisions with windows and high wires. As development continues to grow, the wildlife loses habitat and corridors to get from one place to another. There is plenty of blame to go around.

Compliance-based Management Strategy which changes off-leash to on-leash and on-leash to no dog is way too restrictive. If GGNRA then claims not enough compliance with new restrictions, where will the proof come from? People who are scared of dogs? This will also punish responsible dog owners because of the few irresponsible ones. This will potentially end off-leash access without giving people a chance to comment on the change. This is a really bad policy and must be removed. We support formalization of the 1979 Pet Policy PLUS off-leash access on any new land that the GGNRA acquires.

One last point...this misguided and very flawed document will also create new problems like leashed dogs are often more aggressive, more dogs will be brought to shelters that are already crowded and more dogs will be killed.

Please consider this and also that we are only asking for a small amount of land, mainly land that we have been using for years. We too have a right to use this land...which by its very name designates the land is for public use...it is not(sadly) anywhere near a wilderness anymore. It is people like us who were/are instrumental in saving places like the Marin Headlands from becoming a housing development.

Thank you.

Sharon Salisbury David Morris

Correspondence ID: 3552 **Project:** 11759 **Document:** 38106
Received: May,27,2011 07:58:48
Correspondence Type: Web Form
Correspondence: Please reconsider restrictions on dog use areas within GGNRA sites. Since moving out of San Francisco to a suburb, Belmont, in January of this year I am struggling to find places due to restrictions on areas to see that our yellow lab gets exercise and is able to interact with other dogs. I have continued to use Fort Funston and Crissy Field for the enjoyment of our family with our dog. To limit these or other proposed sites for dogs leaves a severe loss of opportunities. Apart from Rodeo Beach and one trail out of Muir Beach there are very few coastal spots in Marin that are accessible for dogs. Just this past week my mother visited from the Midwest and she is disabled. I had heard about a dog beach in Pescadero and in addition to the

fact it was 17 miles South of Half Moon Bay, the approach to Bean Hollow State Beach was too steep and rocky for her to be able to participate and she had to wait in the car. Believe it or not others often enjoy interacting with our dog (and other dogs) in the recreation areas. There is a lot that goes into maintaining a pet so those who cannot due to age, disability, logistics etc. can have opportunities to experience these interactions in the GGNRA sites and other dog-friendly sites. It appears there is little evidence to support a significant adverse environmental impact by dogs. Furthermore, the owners, not the dogs, should be penalized for irresponsible management of pets.

Correspondence ID: 3553 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Please commit to preserving the animals and resources that make California unique.

Correspondence ID: 3554 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: To whom it concerns, Unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

Thank you, D.Bryan

Correspondence ID: 3555 **Project:** 11759 **Document:** 38106
Received: May,27,2011 08:25:07
Correspondence Type: Web Form
Correspondence: I am firmly against the new proposal for off leash dogs at the GGNRA. I have been walking my dog on several parcels of land managed by the GGNRA over the past ten years including Crissy Field, Baker Beach, Fort Funston, and the Presidio trails. During this time I have witnessed very few incidents of the dogs creating problems. Most dog owners have their dogs under voice control and scoop the poop.

Making these areas on leash are going to increase incidents, not prevent them. I have seen runners and bikers get tangled up in leashes.

I would think the park police would have better things to do then chase after off leash dogs. Currently, dog owners police each other by chastising those who do not scoop or who have uncontrolled dogs off leash.

I hope the GGNRA reconsiders this preposterous proposal.

Correspondence ID: 3556 **Project:** 11759 **Document:** 38106

Received: May,27,2011 08:42:27

Correspondence Type: Web Form

Correspondence: To whom it may concern-

As it stands, the Draft Dog Management Plan for GGNRA will bring about many more problems than the minor ones it hopes to alleviate. Here is my own personal example:

I live near the Panhandle, and I walk my dog to the Presido (Crissy Field)at least twice a week. Since I can walk my dog through the Presidio to get to Crissy, I walk. If the Dog Management Plan is accepted I will be forced to drive to the Presidio. Since thousands of local dog owners do the same thing, they will be forced to drive as well.

Consider all the extra car traffic and gridlock that will be caused by this plan - a very serious (unintended) environmental consequence of changing the current policy. I suggest that the dog policies as currently enforced remain in place.

thank you

Mark Gavenda Western Addition

Correspondence ID: 3557 **Project:** 11759 **Document:** 38106

Received: May,27,2011 08:50:51

Correspondence Type: Web Form

Correspondence: My family spends a lot of time enjoying GGNRA property in and around San Francisco. Like many others, the open space, so accessible to the city, is a big reason we live in San Francisco. We moved to San Francisco from Maine-at the time of our move, the beach near where we lived was prohibiting dogs-I can't say it was the reason we moved, but, it made the move a lot easier. Walking the dogs on the beach (the beach in the summer was only accessible to dogs before 9 or after 6) was a community event. You saw the same people every day-it made all of us feel a part of something larger which is important. Taking that away from the dogs, took a huge part of community involvement and social interaction away from the people. Here in San Francisco, the dogs are very much part of, and an indentifying characteristic of the community we live in. The City is an incredibly dog friendly city, which in turn, makes it just a friendly city. Our

dog doesn't run off leash as he has never really mastered the coming back part and has one too many times swum out farther than his ability-but that doesn't stop us from enjoying the area or relishing in the pure joy you see on the faces of these dogs running free-in an urban oasis-and their people taking in the scene, talking to friends and making new friends. I have a two year old daughter-and I can't even begin to describe the joy she takes in watching the dogs play, swim, run and "dance." This is about the dogs, yes, but it's also about the people. I don't want to live somewhere where joy is kept on a leash. It will permeate all aspects of our community. San Francisco is the last place in the country where I expected joy to be kept on a leash. Life is hard enough-why would we take such action to take something away as vital to our community? Thank you.

Correspondence ID: 3558 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3559 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am a dog owner in Marin County and regularly use the GGNRA for leisure activities with and without our dog.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas

within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

David Wagoner

Correspondence ID: 3560 **Project:** 11759 **Document:** 38106
Received: May,27,2011 09:25:51
Correspondence Type: Web Form

Correspondence: GGNRA Draft Dog Management Plan/EIS.

Overall I am not a supporter of banning dogs out right from the GGNRA. It is a park for all of us and for the most part dog owners are responsible. While I understand a plan to have the GGNRA inline w/other NPS sites- the GGNRA is different from almost all other NPS sites. It is a collection of different parcels- some urban so rural that have been patched together. My wife and I are supports of the GGNRA through the Parks Conservancy because we want to support a park for all.

I do believe that most dog owners are responsible, and I can understand restrictions on so many dogs per person as one way to help out with the concerns of this EIS. I also would support seasonal closures of sensitive sites (i.e. during breeding seasons) but not full closure.

As for trail use, and we are avid trail hikers with our dogs in the Marin Headlands. If there are concerns about trail use, I would argue that horses and mountain bikers cause more damage to trails than dogs ever will.

I understand your daunting tasks, but I hope that you will preserve the concept of the parks for all users.

Andrew Lie DVM

Correspondence ID: 3561 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: To: Frank Dean, GGNRA Superintendent Christine Lehnertz, National Park Service Western Regional Director San Francisco Supervisors John Avalos, David Campos, David Chiu, Carmen Chu, Malia Cohen, Sean Elsbernd, Mark Farrell, Jane Kim, Eric Mar, Ross Mirkarimi, Scott Wiener, The Honorable Nancy Pelosi, Jackie Speier, Dianne Feinstein and Barbara Boxer

We, the undersigned, represent businesses that provide services to dog owners and dogs. We train dogs, sell pet food and pet supplies, walk dogs and provide a variety of other services.

We oppose the Golden Gate National Recreation Area's proposed "dog management plan," which will severely limit off-leash dog walking and dogs in areas like Ft. Funston, Crissy Field, Ocean Beach and others, and we ask you to oppose it too. We disagree with this proposal for a variety of reasons, but we will focus here on the economic impacts for small businesses like ours:

*The GGNRA's preferred alternative will negatively impact many of our businesses, and will hit dog walking businesses especially hard.

*The proposal is harmful to our clients and customers.

*The proposal will hurt San Francisco's reputation as a dog friendly city, which currently attracts tourists interested in dog-friendly destinations.

In these economic times, we simply cannot afford to put small business owners in jeopardy. Please stand up for the dog-loving community in San Francisco and the businesses that support it. We urge you to oppose the GGNRA's proposed dog management plan.

Thank you for your consideration!

Sincerely,

Joy Bonehill The Barking Lot

John Delaplane Four Legged Fitness

Joe Mahavuthivanij Yapsie.com

Angela Gardner All About Paws Pet Care

Deborah Deegan DogTales Walking & Sitting Service

Christopher Hayes K-9 Free Runners

Stephanie Miller SF Puppy Prep

Jeff Fielding Jeff Fielding Pet Photography

John Chirico ABC Dogs

Janet Slissman Doggie Business

Sanford Johnson Sunset Pet Supply

Irma Gomez-Giannini, Laura Hulse Avenues Pet Hospital

Michelle White Maxwell Beauty and the Beasts Pet Grooming Natalie Tondelli TopDog SF

Chelsea Pruitt Citipets Michelle Fichelberg The Pawber Shop

Erin Kelley, Lina Arafeh, Michele Melton Rocket Dog Rescue Steve
Hooker Hooker's Happy Hounds

Conor O'brien Jeffrey's Natural Pet Foods Jonathan Tracy, Clodel Gosuico
O'Paws LLC

Beverly Ulbrich The Pooch Coach, LLC

Jesse Freidin Jesse Freidin Photographer

Heather Sanders Wags 'n Wellness | Canine Holistic Therapies Kasie
Maxwell Rara Avis | San Francisco Raw Feeders (SFRAW)

Pamela Quattrochi Roaming Hound Dog Walking

Jenn L. Loayza Doggy Rules Kitty Rules!

Sue Minsuk Doggie Do Right Dog Training

Wayne Sheridan Rogue Moving & Storage

Nancy Stafford Penguin Pet Pampering

Emy Sakai The Urban Paw

Isabel Saques SF Surf Dogs

Megan Brezovar K9 Safari

Brendan O'Mahony Happy Tails Dog Walkers

Apollo Gerona UGA & Company

Jessey Walls Fetch in the City Audrey McCann McCann's Canine Care

Janet Council Adios Dog Walking Laurie Klein-Coletti Wanna go bye bye
dog walking service

Sky Kral Cloud 9 Canine Dog Walking Adventures Jessica Chase
Tailblazers

Shannon Carlin Shannon's Pet Care Stacy Kirshbaum Paws A Moment Dog
Walking

Eva Lauderback Ruff Riders K-9 Adventures, LLC Hope Tondelli The

Better Petter

Rodrigo Sznajder Rodrigo Sznajder Dog Walking Lisa Luthultz The Dog Pal

Shannon Carlin Shannon's Pet Care Suzanne Bohnel Dog Daze Pet Care

Jean Kind Jean Kind Pet Care Jan Mills Wusupdawg!

Jenny Test Dog Grrl Akiko Kariya Doggie Boogie

Michelle Douglas Bark for the Park Barbara Delman Puppy Pause

Lynn Miller The Royal Bark & Meow Luke Browne Play It Again Sam Dog Walking

Susan Fry Pet Food Express Janet Bran Pretty Cat Care

Greg Mayor Eco Pawz Angie Needels A Sensational Creation

Amal Murgian Ayalal Amalco Ltd. Jenny Test Dog Girl

Donna Montgomery Development by Design Chelsea Hardaway Hardway

Loida Sorensen Realtor Fawn Pierre Dog Trainer/Teacher

Nancy Arrowsmith Bimma Loft Tahra Hanley Tahra's Temptions

Deana M. Cherny Cherny et al Katie McCobb Citizen Hound, SF

Dave Kelly Golden Gate Bark Michael Moore Urbanhound

Marya Taylor Marya Taylor Dog Walking Patrick Byers Awesome Pawsome

Kristi Mill A Girl and Your Dog Alex Cargile Active Dog Adventure Club

Charlie Hunter Charlies Angels Dogwalking Rachel Porter Dogtails of the City

Scott Presti Rat Pack Lisa Walset Doggy Style Down Home Dog Walkin

Steve Richmond Significant Other Secrets Michale Crang Paws on Earth

Lee Morris DVM SF Pet Hospital Martin Blackfield Blum-Blackfield

Insurance Agency

Lori Potter Eccolo Media P. Oreilly O'Reilly Assoc.

Lynne Stillerod LOS Assoc. Tammy Mehmed The Puppy Nanny

Isaac Jose Dog Walking By Fobar Taj Panganiban Nor Cal Dog Academy

Pamela Wyman Dog Evolve Sandy Thompson Bravo Pup

Sid Tarlow Sid's Not So Vicious Bow Wow Brigade

Lynette Spiegel Jeffery's Natural Pet Foods

Correspondence ID: 3562 **Project:** 11759 **Document:** 38106

Received: May,27,2011 09:37:27

Correspondence Type: Web Form

Correspondence: We are active hikers with our Vizsla at Fort Funston and am very concerned about the impact this decision will have on many families and their canine companions. This is an important quality of life issue for our family and the many other dog owners that frequent Fort Funston and other hiking friendly areas. Please protect these designated areas need to be protected for ALL.

Correspondence ID: 3563 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: To whom it may concern,

I am urging the park service to support Alternative D in the GGNRA Draft Dog Management Plan. The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it, and I strongly believe Alternative D best reflects the national park values.

I believe in the following points in support of Alternative D:

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Please consider this comment in your decision.

Sincerely,

David Kajtaniak

Correspondence ID: 3564 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I have been taking my canine companion, Ringo, to Fort Funston for over four years. I and all my friends have been most respectful of this area. And having dogs there makes it so much more of an interesting experience than it would be otherwise. The area is beautiful and remains that way with humans and dogs frequenting the area. It would be a great loss to SF should such areas be inaccessible to off-leash dogs.

Sincerely, Michael Yanakakis San Francisco, CA 94114

Correspondence ID: 3565 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: This letter is respond the the current DEIS Dog Management Plan, with suggested alternatives that mutually benefit the constituents and government officials imposing this plan.

You must acknowledge that dog walkers throughout the Bay Area are considerate constituents who, for the most part, actively follow current laws and regulations; pick up after their dogs; and are environmentally sensitive. There are indeed a few who spoil the situation, but the proposed new Plan severely regulates (punishes) thousands of dog lovers who are very considerate with their pets. I have lived in major parts of the United States, and the Bay Area is fortunate to have organized dogwalking groups that host monthly clean up activities in major park areas. Please note that there is not the same level of attention for Horse riders, beach- and park- attendees who damage grounds with inconsiderate trash (and horse remains) throughout Ocean Beach, GG Park, and various Marin beaches.

If the GGNRA was most concerned about environmental impact, it would severely fine those who litter (this is not enforced today) - ; invest in more trash receptacles and disposal management; and perhaps consider a for-fee membership system for dog areas to help maintain and preserve the areas. For those in the dog-walking profession, a limit of 8 dogs (not 3) is a proven management number where they can keep an eye on dogs for refuse cleanup.

To encourage more environmental protection, areas can be (are, and have been) cordoned off to allow for regrowth; this has proven an effective measure, and this could continu. Sections could be rotated for regrowth throughout park areas. Dog owners would stick to cordoned off or restrictive areas if more signs were posted. Again, fines or violations help enforce this, and noting this on your signs would be a very blatant way of ensuring enforcement. Should you accept these suggestions as a compromise, you

could meet with the dogwalker community to encourage dogwalkers to self-regulate (call out violaters) -- which I know they would do. We want to curb the "bad apples" in the bunch as much as you do.

The park is meant for enjoyment of people and animals. It appears the GGNRA is going to vast extremes to severely limit this enjoyment by instituting the proposed plan. As a doglover and environmentalist, I suggest you the following:

* Please allow dogs off-leash in key sections of all areas; perhaps set "time zones" (and publish) of when dogs are allowed off leash * Limit dogwalking organizations to 8 dogs per walker * Set strict enforcable fines for not picking up after dogs (requires people, but you'd make some money) * Require renewable, annual membership fee (\$25?) for any person w/a dog; membership card must be on person when with dog; fees would go to park preservation * Rotate sections/areas of the park for regrowth; you do this now, however add strict signs with warnings on steep fines (\$1000) * Enforce violations for not picking up dog feces and trespassing on cordoned areas * Add more signs, trash recepticles and waste pickup services * Meet with dogwalking community to encourage self-regulation (call out the violater when you see it) to encourage environmental protection

Do not punish the entire community for the sake of environmental protection. We taxpayers are paying for government salaries and GGNRA park maintenance, and this plan goes far beyond reasonable consideration and punishes those who support the system.

I ask as a taxpayer, doglover and environmentalist to "scale back" the plan to a reasonable measure. You will find the dog owner community receptive and proactive if you could meet us 'half-way'.

Regards, Teresa Fortescue

Correspondence ID: 3566 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear National Park Service,

I just want to express my grave concern over the proposal to greatly constrict off-leash dog walking in the city of San Francisco and Marin in the Golden Gate National Recreation Area. This area is filled with many dog owners/lovers and we use these areas with respect and gratefulness. We all truly hope the status quo continues and that we can continue to walk our

dogs at Fort Funston, Crissy Field, Ocean Beach, Rodeo Beach, etc.

San Francisco Bay Area has a great deal of open space territories for non-dog-owners: Golden Gate Park, areas of the coastline and a plethora of parks so there are many places where people who do not like dogs can go to relax and enjoy the outdoors. Almost all of the dog owners in the Bay Area are very responsible and take very good care of their animals and obey the rules of guardianship. They pick up feces, often some left accidentally by another, control aggression if necessary and manage their dogs around sensitive or fearful people. It is a rare 1% or less of people who seem to be reckless. In any demographic or group there will be people deviant of what is considered appropriate behavior. In fact, more parents of children are less responsible than dog owners.

Please, I urge you to maintain the status quo of the dog walking areas and rules in GGNRA. It will help keep peace in the area much more than if the proposal goes through. If the proposal goes through, there will be many more problems with dogs of the Bay Area than there are now. It is a short-sighted way to manage what is perceived as a problem by a select few.

Please take my and other peoples' needs and desires in consideration as much as the authors of the proposal. We are many and we are hopeful that you will see things our way and make the right decision.

Sincerely,

Linda King-Byrnes

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|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 3567 | Project: 11759 | Document: 38106 |
| Received: | May,27,2011 10:21:17 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Any plan that restricts off-leash dog activity should be balanced between opportunities for dog owners to have a place in which to responsibly play with their canine companions and the needs of others to experience the park in a non-dog atmosphere. When dog owners exercise appropriate behaviors and train their dogs to responsible behavior, negative impacts of the presence of dogs can be mitigated. Therefore an educational program that includes a permit (like a tag or other easily-seen identification) when a dog has demonstrated minimum obedience might be an option. This could result in special areas where only tagged animals could play versus a place where onleash dogs could accompany their owners versus no-dog areas. | | |

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|---------------------------|------|-----------------------|------------------------|
| Correspondence ID: | 3568 | Project: 11759 | Document: 38106 |
|---------------------------|------|-----------------------|------------------------|

Received: May,27,2011 10:25:36

Correspondence Web Form

Type:

Correspondence: I have a dog and strongly support the GGNRA Draft Dog Management Plan. It strikes the right balance between protecting the many endangered species in San Francisco's Presidio while at the same time it offers unusually liberal use by canines and their guardians/walkers.

Correspondence ID: 3569 **Project:** 11759 **Document:** 38106

ID:

Received: May,27,2011 10:31:10

Correspondence Web Form

Type:

Correspondence: Please save Mori Point for leash free dogs. I lived by Mori Point for almost 40 years and I walked my dog every day. I do not feel obligate to take my dogs else where to get an exercise. So, please give senoir citizen some privilage to feel free to walk their dog and get their own exercise.

Correspondence ID: 3570 **Project:** 11759 **Document:** 38106

ID:

Received: May,27,2011 10:32:12

Correspondence Web Form

Type:

Correspondence: Please do not change the existing laws, but enforce those that are already in place. In hard times it is more important than ever for people with dogs to have places to play. Thank you.

Correspondence ID: 3571 **Project:** 11759 **Document:** 38106

ID:

Received: May,27,2011 10:36:36

Correspondence Web Form

Type:

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. As an urban ecologist, I find it problematic to create exclusive wilderness areas in urban environments that are inaccessible to many of their human residents. These types of divisions often lead to class discrimination, reserving and restricting these areas to those who meet their criteria for entry.

The GGNRA can accommodate both recreation and conservation. It was

designed as an*urban recreation area*, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

I believe that creative solutions can be found to allow dogs' presence in the GGNRA while still protecting the wild beings that live in these areas.

Sincerely,

Max Salamander San Francisco, CA 94122

Correspondence ID: 3572 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean,

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

Yosemite, ok. Sequoia, Kings Canyon ok too. My own front yard? No. I am unable to do the kind of recreation I enjoy most, hiking with my dogs, at the national parks in California. The beaches of San Francisco have always been one place to have some breathing room for those of us unable to drive to the East Bay to hike with our dogs. I have spent hours each week at Fort Funston and enjoy the community of people who go there with their dogs. The Fort would be a pretty empty place without the dog people as most others find it too cold, windy and lacking amenities. I know the wildlife intimately...the bunnies, owls, ravens, seabirds and all the passing marine mammals. As a member of both the Sierra Club and the Audobon Society, I have a great respect for the natural world and have not noted harm over the

20+ years I have been walking there.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Jeanne Edenson San Francisco, CA 94112

ID:

Received: May,27,2011 10:48:48

Correspondence Web Form

Type:

Correspondence: I walk my dog early mornings at Ft. Funston and it is the most therapeutic act of each day. My dogs socialize as do I. Everyone is responsible and respectful of the land and we "regulars" even pick up after "nonregulars" who just drop in occasionally. We "regulars" will suffer the most with stringent leash laws. Thus far the area allocated in the draft for dogs to run free is sand, ice plant and foxtails. . nothing indigenous to the area and not safe for dogs. We implore that you reconsider the mission of GGNRA and the dire need for open space for urban dwellers to have for themselves and their dogs.

Correspondence 3574 **Project:** 11759 **Document:** 38106

ID:

Received: May,27,2011 10:54:36

Correspondence Web Form

Type:

Correspondence: My dogs love the beach. We usually go to Muir Beach. They are so "elated" every time they go there. My boyfriend and I have commented numerous times that all dogs at the beach are happy. We never see dogs "fight", unlike dog parks.

It's the only place where they can get totally exhausted from running after balls or each other.

They love the water as much as people!

What a tragedy it would be if dogs would no longer be able to enjoy the beach.

I know I'd be devastated if I could NEVER go to the beach again. How about YOU?

Correspondence 3575 **Project:** 11759 **Document:** 38106

ID:

Received: May,27,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: May 27th, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

Hello, I live in Crocker Amazon area and go to Ocean Beach every Saturday with my little dog for a walk and socialization. I and all our friends pick up after our dogs and I often bring larger bags to pick up garbage on the beach, which I assume they were left behind by people who spent time eating and drinking the night before. We not only pick up after our dogs, but also pick up after people who use the same beach. I am not sure why we, dog guardians, are the one blamed for harming the environment.

I also want to mention that I am Japanese and go to Ocean Beach just to let my dog run around off-leash. I would not be at Ocean Beach for any other reason. It is too cold for me to go there just to hang out. The beach is useless for me without the off-leash area.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Hiromi San Francisco, CA 94112

Correspondence ID: 3576 **Project:** 11759 **Document:** 38106

Received: May,27,2011 10:59:34

Correspondence Type: Web Form

Correspondence: The draft document is enmeshed in opinion unsupported by scientific evidence. This is particularly true when linking canine activity to endangering threatened species. There should be no reduction in allocated space allowing off-leash recreation. There is so little space now that it appears that this document has been developed by people with an anti-dog agenda.

Off leash recreation is more than just about dogs. It's about people and the form of social recreation that they choose.

I have visited Fort Funston at least 1000 times and, although I no longer live in San Francisco, continue to visit each time I stay in San Francisco (at least once each year). GGNRA is a RECREATION area and must not be lumped into a "one size fits all" mentality by claiming that it is a National Park and, therefore, must be just the same as every other National Park. It's an urban recreation area.

Correspondence ID: 3577 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 27th, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

Greetings, my name is Phoebe Fearing and I am a San Francisco resident in the Sunset/Parkside District and own a small dog. Daily exercise is very important to both of us and so is the environment. I believe that open spaces should be available to us and that at the same time, it is everyone's responsibility to care for the environment which is why I've been writing my supervisor, Carmen Chu, to address the littering and pollution issues in our neighborhood. I find it appalling how so many people recklessly litter and pollute while others volunteer many hours of their days to clean up after those who abuse their freedoms. I think that the same principles of responsibility to take care of our environment should guide dog owners in open areas and that we must be responsible for the proper supervision of our dogs to ensure that they are not harming our parks, but they must be allowed to run freely for their health. After all, dogs started out in the wild. It seems absurd to me to restrict them to from being off leash or even on leash in parks. I hope we can find a way to protect the environment and also give our dogs the freedom they deserve to get their daily exercise in as many places as possible. With some guidelines for owners on how to properly supervise and control their dogs, I think this must be possible.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of

impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Phoebe Fearing Sunset/Parkside, San Francisco

Correspondence ID: 3578 **Project:** 11759 **Document:** 38106
Received: May,27,2011 11:12:40
Correspondence Type: Web Form
Correspondence: As a private individual I would like to submit my 2 cents worth on this proposed plan. I will admit I have not read through the entire document but I have gone to a number of meetings where a park representative was there to present the proposal and answer questions. A few things that came up that were never clarified was why was this proposal even necessary. The park representative brought up replacing indigenous plants but when it was brought up that there is no proof that the plan would show any progress in that area and similar programs have been less than successful he said no scientific studies had been done, that it is a "balanced use" issue. It struck me as the park rep was originally using "endangered species" to justify the proposal but when he couldn't back it up with any studies he changed his tactics. If balanced use it the issue I'd like to point out that more often than not when I am out with my dog parents approach me and ask if their children can say hi to my dog. They more often than not live in an apartment that does not allow dogs and want their children to become familiar with proper interaction with dogs which I commend. There are plenty of places in the bay area for people who do not want to interact with dogs to go without restricting the existing ones.

Also I am concerned with how things are to be handled if the proposal passes. It appears that a 75% compliance to the new rules will be required. The park agency will be the ones deciding if this is met or not and if not they are the ones who will restrict access even more with no input/recourse by the public. I am curious as to why it would be believed that if a little restriction doesn't work more restriction would be better? I would be much

more comfortable if they found it wasn't working it went back to the current policy until another option could be explored.

I have never found anyone who had a problem with the way the off leash areas have been used so see no reason to waste money on a non-issue when there are so many REAL issues such as homeless in the park who defecate, urinate, use drugs in front of tourists and families (yes, I've witnessed all of the above) or repair work of existing walkways and attractions. As my dad used to say "If it ain't broke, don't fix it".

Thank you for allowing me to comment.

Correspondence ID: 3579 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I have lived in the Glen Park area for 7 years and enjoy the parks with my dog almost daily. I think of myself as green and treat the parks as if they were my own backyard. I feel that my fellow San Franciscan's feel the same and enjoy the solidarity we feel when walking our dog's at the local parks.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an

adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Michelle James San Francisco, CA 94131

Correspondence ID: 3580 **Project:** 11759 **Document:** 38106

Received: May,27,2011 11:17:36

Correspondence Type: Web Form

Correspondence: I am writing to you about the Dog Management Program. As a dog owner and resident in San Francisco, I am very disappointed to hear about these pending changes. I am greatly concerned that you have not consider the impact to human and dog well being. My understanding is that GGNRA has a recreation mandate. I spend much of my free time enjoying the off-leash parks with my dog Argos. Being able to bring my dog contributes greatly to my ability to enjoy the parks. Furthermore, since we live in a city, it is hard for my dog to get adequate exercise as it is. Without off leash dog parks available to us, he would not get much exercise at all. There is much research on the psychological and physical benefits to dog ownership; two articles in the New York Times recently highlighted this research. Dog owners are less likely to be overweight and have cardiovascular diseases because while walking their dogs, they get exercise themselves. More and more hospitals and senior citizens centers are utilizing dog therapy. Speaking personally, my husband adopted our dog to help me copy with a personal tragedy. I particularly enjoy taking Argos on off-leash walks where we can play fetch. The time we spend together at these parks are our happiest moments together.

Correspondence ID: 3581 **Project:** 11759 **Document:** 38106

Received: May,27,2011 11:26:04

Correspondence Web Form

Type:

Correspondence: May 26, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. I have attended a number of public meetings on the subject and have studied the findings in the report. As a San Franciscan who has been involved in the area of park advocacy, I am very distressed to think that we are about to remove most of the off-leash areas in the GGNRA. I served on a citizen's advisory committee in the mid-1970's when the GGNRA was just in its infancy. The idea to create an "urban park" by replacing outdated military sites with all types of recreational needs was so exciting. This was to be a unique park. It was not a pristine wilderness but rather the reclamation of restricted and areas that had been off-limits to our citizens. Dog recreation was encouraged as a way to bring people out to the new park lands. It worked and in fact worked well for over 40 years. Which is why this is so distressing. The proposed rules will seriously impact thousands of our citizens. For over 35 years I have been visiting the park lands of the GGNRA. Over those years I have brought both dogs, children and grandchildren to the park. Our family has so many special memories at Fort Funston in particular?.Here are just a few:

1. My dear friend was diagnosed with cancer, she wanted desperately to get a dog but due to her illness it was not wise to take on that responsibility. I took her to Fort Funston so she could interact with dogs, talk to their owners and be surrounded by that kind of love. It was incredibly therapeutic.

2. Another friend died very suddenly of a brain aneurysm about 10 years ago. Her family wanted a special memorial to honor her life. The place chosen was Fort Funston, amid the fog, in the dunes---with her dogs taking center stage in this final farewell. It was the most moving ceremony I have ever been part of. This was her special place?where she and her dogs could explore nature together.

3. Over the years I have entertained many friends and family from as far away as Switzerland. I always take them to Fort Funston so they can experience the wonderful joy of seeing people openly recreating with their dogs. Dogs running and playing while their proud owners visit and share experiences. It is a most unique experience. Something not experienced in most parts of the country and the world. THEY LOVE IT. It ranks right up there with cable cars and hill side views. People tell me over and over how they wish they could have this experience in their communities. They think of San Francisco as forward thinking and congratulate us on our unique form of recreation.

4. In 2008 my new husband proposed to me on the dunes of Fort Funston. It

was in the presence of my young grandson and our new puppy. I remarked to him that he could not have found a more perfect place. We looked at the dog and young child running on the sandy dunes and absolutely melted. These are the special moments of my life. They involved people, dogs, nature?all in harmony. This is why I go the park.

I also attended the meeting held by the San Francisco Board of Supervisors, on the impact that changes in the dog policy would have on parks in San Francisco. As a lifelong park advocate I implore you to take the resolution that was passed very seriously. Much of the proposed dog plan changes will be on GGNRA land that is within the City and County of San Francisco. Our citizens need to have a wide range of recreational opportunities. We have a tiny 7 X 7 mile area of land-there are over 800,000 people who share this space along with more dogs than children. We must look at the overall effects that rule changes will have on our entire city and the impacts that removing opportunities for recreation in one section will have in others. GGNRA lands are not islands that can be separated out of the city without consequences to the whole.

Additionally, I agree very strongly with these points: The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. Sincerely,

Linda Stark Litehiser San Francisco, CA 94112

Correspondence ID: 3582 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Align commercial dog walking rules with county or city regulations. These are my personal comments and observations regarding this plan: I go to Fort Funston almost every day, with multiple dogs. My dogs (and myself) are very well trained. I pick up litter that often washes up on the beach. I also clean up after my dogs and other people's. I am confident in stating that I leave the park cleaner than I find it, each time I go. I am not the only one. Many San Franciscans who enjoy this area are also responsible environmentalists and nature-lovers. I propose fining or assigning community service/park clean up to people (dog-owners/walkers or otherwise) who act irresponsibly, rather than punishing the many people who might have dogs and use the park responsibly. I would be more than willing to involve myself and others in park clean-ups and restoration of the area. This is a far more reasonable solution than any of the proposed solutions or alternatives.

Sincerely, Rasan Lowell San Francisco Ca 94122

Correspondence ID: 3583 **Project:** 11759 **Document:** 38106
Received: May,27,2011 11:49:02
Correspondence Type: Web Form
Correspondence: Sir;

I urge you to adopt a strict "no dogs allowed" policy to all property within your purview, and then rigidly enforce it. Most dog owners of San Francisco are motivated by a puerile narcissism that finds expression by inflicting their pets on everyone else. Irrespective of posted regulations they encourage their pets to bark, dig, urinate, defecate and engage in howling battles. Only a few clean up after the animals, and many turn them over to professional "walkers" who regularly invade the parks and playgrounds with packs of dogs that they turn loose and then scream at for hours.

Regardless of whatever regulations you adopt, only strict enforcement will save the GGNRA from the dogs. The people who belong to SFDOG are scofflaws and, while they lobby vigorously for lax dog regulations, have no intention of abiding by rules they don't like in any case. San Francisco's 100% policy of non-enforcement of dog laws has nurtured a generation of dog enthusiasts who really don't believe that there should be any regulation of dogs whatsoever, and are indignantly self-righteous at the very suggestion that rules should apply to THEM. If you have ever had to deal with spoiled, surly, ill-bred adolescents, then you have a small inkling of what it is like dealing with these people.

Once again, I implore you not to let them to take over and ruin the NRA as they have so many of San Francisco's parks and playgrounds. The GGNRA should benefit people, but will quickly become a "dogs only" playground once you allow them in.

Respectfully submitted,

A citizen of San Francisco

Correspondence ID: 3584 **Project:** 11759 **Document:** 38106
Received: May,27,2011 11:57:03
Correspondence Type: Web Form
Correspondence: To whom it may concern:

I read the following letter to the editor in the San Francisco Chronicle on

Thursday, May 12, 2011, and feel it perfectly reflects my feelings on the dog leash issue in the Golden Gate National Parks.

Please protect our precious San Francisco ecology by requiring dogs in the park to be on leash and by limiting the number of dogs a single person can bring into the park.

Thank you.

-- "Leash commercial dog-walkers"

Commercial dog walkers are abusing our parks.

As a frequent visitor to the Presidio, I encounter many groups of eight to 12 off-leash dogs in all areas of the park.

Although I love dogs, it does not seem fair or appropriate for commercial operators to allow their paid-for charges to run rampant in public parks where they threaten native wildlife and plants, as well as adults and children.

At the very least, these commercial operators should be limited to four on-leash dogs (the maximum one person can truly manage) in specific areas of the park.

They should be held accountable for infringements of park policies and, as other park vendors do, should have to purchase a license to operate in the park.

These funds could be used to enforce the regulations and maintain the dog-access areas.

Jean Colvin, San Francisco

Available at: <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/05/11/EDRE1JEE52.DTL#ixzz1NKeBoUeI>

Correspondence ID: 3585 **Project:** 11759 **Document:** 38106
Received: May,27,2011 11:57:28
Correspondence Type: Web Form
Correspondence: Dear Mr. Frank Dean:

I am very supportive of the Draft EIS for the GGNRA Dog Management Plan, which I think recommends as the preferred alternative a nice mix of on-leash, off-leash, and no-dog areas and a clear description and

enforcement of dog rules, which is what the National Park Service is proposing. I have read through the executive summary of the EIS and looked at the maps and am very supportive of the preferred alternative that the National Park Service analyzed. As the mom of two young children, I love the idea of having clear dog regulations that are actually enforced and a mix of off-leash, on-leash, and areas where dogs are not allowed.

In particular, having areas at Ocean Beach, Fort Funston, Crissy Field, and Baker Beach where we can picnic, walk, and relax with kids without worrying about off-leash dogs is very appealing to me. In particular, I am very supportive of having areas at Ocean Beach (Snowy Plover Protection Area), Baker Beach (North Beach), and Crissy Field (Wildlife Protection Area and East Beach) where we can recreate with young children in an area with no dogs. I am also supportive of having areas where dogs would be on-leash (the trails at Fort Funston, portions of Crissy Field Air Field and Promenade, Fort Point trails, Coastal Trail at Ocean Beach, and Baker Beach South Beach and trails). There are still large areas where off-leash dogs would be allowed, including the northern end of Ocean Beach, a large portion of the Crissy Air Field and much of Crissy Field Beach, and the beach and a large area north of the parking lot at Fort Funston. I think the National Park Service has proposed a very nice compromise between on-leash, off-leash, and no-dog areas within GGNRA lands in San Francisco.

There are many users of the GGNRA including families with young children (such as my own family), seniors, and people with disabilities or a fear of dogs. Not everyone wants to recreate with off-leash dogs or even with on-leash dogs. I have had several negative experiences with dogs within the GGNRA, where I have had to pick up one of my children to get them away from a dog, push a dog away from our food, or clean dog poop off my children's shoes. My children are smaller than many dogs. While the majority of dog owners are responsible and the majority of dogs would not hurt my children, I am not always able to tell which dogs are safe and which are not. Worrying about what a dog may do or dealing with dogs that do approach us just takes away from our ability to enjoy and relax. I have tended to avoid parts of GGNRA that have high numbers of off-leash dogs, such as Fort Funston and portions of the beach at Crissy Field.

I have also seen many dogs off-leash at Ocean Beach within the on-leash Snowy Plover Protection area, which I find upsetting, as they are potentially impacting a threatened species. I think as important as the establishment of clear rules on dogs is the enforcement of the rules by National Park Service officials. Under the current situation, it is not always clear what the rules are and whether or not they are enforced.

Sincerely, Amy Hutzel

Correspondence ID: 3586 **Project:** 11759 **Document:** 38106

Received: May,27,2011 11:59:11

Correspondence Type: Web Form

Correspondence: My comments are in rebuttal to the City of Pacifica's submission (comments), which were based primarily on the recommendations of an entrenched special interest group which seeks to expand the rights of dog owners on our GGNRA lands without regard for other recreational use, safety of hikers and equestrians, or the impacts on natural areas and endangered species. Because this narrow interest group holds sway over the Pacifica City council and sub-committees, there has been very little input either solicited or incorporated into Pacifica's recommendations from the general public who enjoy GGNRA lands for other usage and thus Pacifica's comments are not representative of the vast majority of its citizens.

In regards to the GENERAL RECOMMENDATIONS submitted by the City of Pacifica (in quotes) my comments follow:

1. "the need for more recreational access on GGNRA lands for on-leash dog walkers in Pacifica including loop trails and access to and from neighborhoods or open space areas exhibiting high visitor volume"

Almost all State and County parkland within Pacifica is currently on-leash dog accessible including Pacifica State Beach and McNee Ranch. Further, the City of Pacifica has plans for an off-leash park in the future. The expansion of on-leash areas on GGNRA land would potentially open it to commercial dog-walkers.

2. "the belief that these changes are compatible with maintaining ecosystem integrity" There is no basis for this claim which contradicts many studies showing that dog access to GGNRA lands is detrimental to wildlife with impacts to soil and geology.

3. "our Committee members' observations that under controlled conditions, on-leash dog access to open space has not always, over the past decades, degraded habitat interim?" The Committee did not submit any relevant measurable data made "under controlled conditions" to make this conclusion other than "casual observation" consisting of self-serving observations with no basis in fact.

4. "concerns that the site use restrictions proposed in the DEIS will cause negative effects from the pressures for other outdoor dog-related recreation The City of Pacifica failed to outline exactly what these "negative effects" may be or how it relates to the DEIS."

In regards to the SITE-SPECIFIC submitted by the City of Pacifica (in quotes) my comments follow: "Sweeney Ridge: ?..the fact that the Sneath Lane/A'PS trail is paved would prevent most if not all dogs from accessing the property off the trails (in the event there is non-compliance with the leash law). Proper enforcement of the rules should ensure that few if any violations occur, in which case the environmental effects from site access on this parcel would be minimal."

This assumes that dog owners would keep their dogs leashed AND that dogs can differentiate between paved and un-paved trails and would stay on only paved trails. Would rely on enforcement in a remote area ? but concedes that without compliance and enforcement there would be "environmental effects" in contradiction to their statement above!

"Mori Point: We suggest that the trails designated on Map 17C as "Tmigtac" and "Pollywog" trails be modified to allow on-leash dog access. We believe the likelihood of either the red-legged frog or the San Francisco garter snake being harmed or negatively affected is extremely remote?."

The uplands of the Mori Point area is critical habitat for the endangered San Francisco Garter Snake (SFGS) and trails bisect this area which adjoins Horse Stable Pond, it's most crucial habitat. Currently dog walkers and hikers access this area from three different directions and thus there is intensive pressure on this species because of disturbances. By my own casual but routine observation I estimate that twenty percent (20%) of dog owners do not comply with the current leash law at Mori Point, and that by allowing on-leash access it would encourage more visitations by people with dogs, thus raising the count of off-leash dogs with greater impacts on wildlife. Further, because of the presence of coyotes in the area a greater dog presence would create more conflicts. The belief that on-leash dog access is without negative impacts is totally without merit and has no basis in fact.

"Future Considerations: ?We are concerned that a loss of on-leash dog access on lands within Pacifica might have unwanted economic consequences, as dog walkers will go elsewhere, effectively eliminating the possibility of patronizing Pacifica's restaurants, hotels, or other retail outlets?."

Unfortunately the City of Pacifica sometimes works against its own best self interest and has failed to subsume the interest of dog-owners to the wider economic benefits derived from being adjacent to a National Park. On more than one occasion the City Council has been presented with studies that demonstrate that economic growth near national parks outpaces other areas that lack similar natural amenities. On the other hand increased dog presence in the GGNRA will cause deterioration in the visitor experience

which can generate both social and economic costs. For this reason dog access should be given little weight as far as it's economic importance, must be balanced among more compelling reasons and its potentially negative effects must be managed.

Correspondence ID: 3587 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I live in the San Francisco Bay Area, and enjoy using the GGNRA on a regular basis. Our favorite place to go is Fort Funston, and we typically spend an entire day there every few weeks.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA

was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Leah Standard Newark, CA 94560

Correspondence ID: 3588 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled (me!!!), minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation!!

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input!!!

These are my personal comments and observations regarding this plan: My therapy dog Mila deserves to run! Please allow us to keep this good thing in our two little lives!

Sincerely,

Martin Hamilton

Correspondence ID: 3589 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear National Park Service,

I just want to express my grave concern over the proposal to greatly

constrict off-leash dog walking in the city of San Francisco and Marin in the Golden Gate National Recreation Area. This area is filled with many dog owners/lovers and we use these areas with respect and gratefulness. We all truly hope the status quo continues and that we can continue to walk our dogs at Fort Funston, Crissy Field, Ocean Beach, Rodeo Beach, etc.

San Francisco Bay Area has a great deal of open space territories for non-dog-owners: Golden Gate Park, areas of the coastline and a plethora of parks so there are many places where people who do not like dogs can go to relax and enjoy the outdoors. Almost all of the dog owners in the Bay Area are very responsible and take very good care of their animals and obey the rules of guardianship. They pick up feces, often some left accidentally by another, control aggression if necessary and manage their dogs around sensitive or fearful people. It is a rare 1% or less of people who seem to be reckless. In any demographic or group there will be people deviant of what is considered appropriate behavior. In fact, more parents of children are less responsible than dog owners.

Please, I urge you to maintain the status quo of the dog walking areas and rules in GGNRA. It will help keep peace in the area much more than if the proposal goes through. If the proposal goes through, there will be many more problems with dogs of the Bay Area than there are now. It is a short-sighted way to manage what is perceived as a problem by a select few.

Please take my and other peoples' needs and desires in consideration as much as the authors of the proposal. We are many and we are hopeful that you will see things our way and make the right decision.

Sincerely, Dan Byrnes

Correspondence ID: 3590 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: _____ (date)

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

[Put your personal comments here ? Introduce yourself, identify your neighborhood, say how often you use the GGNRA, and where & how often you take your dog. Counter the argument that we are "anti-environmentalists" by listing the environmental organizations you belong to, or the actions you take that indicate how important the environment is to you.

If you are comfortable doing so, indicate if you are a member of a minority group. The DEIS proposes that many seniors, disabled, or racial/cultural minorities do NOT come to the GGNRA because of off-leash dogs ? let's show how many of us come for EXACTLY this reason!)

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make

the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Shauna Joseph

San Francisco, CA. 94117

Correspondence ID: 3591 **Project:** 11759 **Document:** 38106

Received: May,27,2011 12:20:50

Correspondence Type: Web Form

Correspondence: I am not a dog owner, but i do so enjoy being out on GGNRA beaches and watching the dogs running freely. It makes my heart soar to see such beautiful unbridled joy. This plan to eliminate 90% of the off-leash areas in San francisco and Marin is terribly wrong and short-sighted. From what i'm told, these areas in dispute were promised as off-leash areas when the land was transferred to the GGNRA back in 1972. Where are these dogs and their dog owners supposed to go? You must allow dogs to run off-leash! This is a city, with limited outdoor recreational land, and you must respect the recreational needs of its inhabitants. I respectfully request you leave things as they are, and spend your limited funds on more pressing concerns.

Correspondence ID: 3592 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I am a dog owner living in the mission district in San

Francisco. I frequently walk my dog, a small chihuahua terrier, at Chrissy Field as well as Fort Funston. Both of these places are special to me and my dog because they allow him to run free without any danger of being hit by a car, and to play with lots of other well-behaved dogs. There are not many places available to do this, and we really appreciate the parks in San Francisco. I am a contributor to the Sierra Foundation and the State Parks foundation and wholly support an environmentally-friendly plan to keeping our parks beautiful and accessible to everyone. I have taken my dog for training and made sure that his behavior at the park is safe and monitored. If I ever feel there is danger of him misbehaving (mostly by trying to take picnic food), I put him on leash immediately. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Sara O

Correspondence ID: 3593 **Project:** 11759 **Document:** 38106
Received: May,27,2011 12:32:42

Correspondence Web Form

Type:

Correspondence: I walk my dog at Baker Beach -the proposed plan there is overly restrictive. There are no endangered species of birds there. Dogs are not hurting the sand. I depend on walking my dog there for health and well being as I recreate. The dog walkers there are good stewards of the beach, and we clean up and self regulate the dog activity. The contiguous beach, China Beach is off limits to dogs so why deprive the Sea Cliff residents of a place to take dogs which many residents have been doing for over 40 years. I saw an instance of a dog walker helping to rescue the life of a woman who got pulled out by a wave with her boyfriend. The boyfriend died and the dog walker got a runner to pull the woman out in time as she was unconscious. It seems wrong that naked men can not get a ticket yet dogs would be illegal. People camp out and have illegal fires all the time. If environmentalists think dogs are the problem, then what about the surfers, and cruise ships spewing oil, Fleet Week etc.-aren't those interfering with nature as well? There is a huge population of ravens at the beach and these birds are bullies and affect the wild bird population more than dogs. I personally fill up the container for dog waste bags every week. I warn families if their children are playing in the water and there are undertows or rogue waves. There is no problem at Baker so let us walk our dogs there please.

Thank you.

Correspondence 3594 **Project:** 11759 **Document:** 38106

ID:

Received: May,27,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: The Sacramento Council of Dog Clubs, a coalition of American Kennel Club breed, all-breed and training clubs, incorporated in 1974, supports the enforcement of leash laws because they provide an important safeguard for people, their dogs, wildlife, and parks. The Council is concerned that the preferred alternative in the Draft Dog Management Plan Environmental Impact Statement has only one enclosed off-leash dog play area. The remaining areas proposed for off-leash dog areas are not enclosed. The Council supports the adopting of regulations which would create enclosed off-leash dog play areas. Without enclosure, both dogs and people are at risk.

Thank you for your attention to our concern.

Correspondence 3595 **Project:** 11759 **Document:** 38106

ID:

Received: May,27,2011 12:48:24

Correspondence Web Form

Type:

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re; Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I am a San Francisco Resident that has, since moving to San Francisco enjoyed a number of the GGNRA areas under consideration ? in Particular Rodeo Beach in Marin, Lands End, Baker Beach, Crissy Field, Ocean Beach and Fort Funston in San Francisco. With My husband I am also a ten year volunteer at the Marine Mammal Center in the Marin Headlands, I know and appreciate your work, and that of Brian O'Neill, for all the support the GGNRA has given to the TMMC over the years.

However I am dismayed at the DEIS and much opposed to the changes proposed for both generic and specific reasons which I will try to address.

7 I have a very active dog, a Border Collie rescue Mix, and being active it requires DAILY running. This running is done by myself and/or our Dog Walker. She is insured and Bonded and, and I am sure of her professionalism. Everyone who knows dogs knows that a tired dog is a relaxed dog, and a relaxed dog is a well behaved dog. Off Leash exercise is so much more than on leash exercise. On leash exercise limits the dog to my level of fitness, and that means that by forcing on leash requirements you are binding the exercise of many dogs to that of handicapped, and elderly owners. My dog "forces me" to go out every day and take a walk, and although that can be in my local neighborhood it is nothing like our walks in the Marin Headlands, or Lands End paths, or along Crissy Field. Off leash walking is my time with my dog. He is always under voice control because my time at the park is my time with him ? we "work" together. These moments when my dog runs back and forth with a stick in his mouth are the reason I get in my car and go the GGNRA controlled lands. I always carry two rolls of poop bags on my leash and I will clean up other dogs poop if I find it when cleaning up after mine. I also participate in dog owner's park cleanups, be it in the City or out at Funston.

7 The concept of ROLA is astonishing. As far as I can understand The NPS self appoints itself to monitor a compliance level of 75% based on total dogs observed not in compliance . Who does the observing? A third party? When do the observing? Of course, for it to be legal I presume it will be done for 365 days every day from 5 am to 10pm when the parks close, because, if there is no one there to observe and 100 dogs use the park, and are in compliance they will not be tallied, which means your data is invalid. As you can see ROLA is non-sensical in the way you define it, it the way you

set it up to self police, but even more so in the way you ascribe to yourself the powers to make reductive changes to the use of the park without proper due process. The Poison pill has to be eliminated from the plan as it is unenforceable and lacks any kind of scientific basis (unless, of course you can observe all users all the time)

The fact that this NOLA Compliance based criteria is included in all options automatically disqualifies your alternatives

7 The DEIS does not seem to consider demographics: Answer a question ? is dog ownership in San Mateo/San Francisco County/Marin increasing or decreasing? All the studies I have seen it is increasing. Therefore, as caretakers for lands given your trust for recreational purposes by those counties should you not take that in consideration and offer an alternative where you INCREASE off leash areas? Off leash areas, at the time of the 1979 Pet Policy was limited to only 1% of all the lands you administer. Since then new land has been added but you have DECREASED the percentage of those lands to below 1%. Why is there no alternative where you reflect demographics and the desires of the citizens of those counties who gave you the land and offer another alternative where you increase these lands? Alternatively, since you only have 1% of lands open to dogs, why not, if you take certain areas away can you not have an alternative where you give back other lands now currently closed? I would have loved to have seen somewhere in the DEIS something along the lines of "We are proposing removing XXXX from off-leash areas, but are opening up YYYY to off-leash use." You have the space. Why not use it?

7 Your purposes, for the GGNRA is for RECREATIONAL purposes. These lands are NOT National Parks ? they are ex army installations and they were given in trust for you to administer in keeping with the original deed. You appear to treat Recreation as having an inverse impact on the areas under consideration, ignoring that Recreation WAS and IS one of the four outstanding values mentioned in the 1972 enabling legislation I quote : "maintenance of needed recreational open space". When Daphne Hatch your chief of natural resources management and science at the GGNRA says Quote: "Ocean Beach without the people is an incredible habitat, But people think of it as a sandbox or their backyard." I truly wonder if the NPS knows the difference between Yosemite and Fort Funston or Ocean Beach". When I attended one of you open houses I was told that I was told that NPS is mandated by Congress to "manage uniformly all its areas" she forgot also to tell me that Congress added "The authorization of activities shall be construed and the protection, management, and administration of these areas ? shall not be exercised in derogation of the values and purposes for which these various areas have been established". So there is no mandate to match the GGNRA's policies with National Park Service requirements that dogs

not be allowed off-leash in a national park.

7 Snowy Plovers: Your own research - Forrest Cassidy St Clair and Warren all demonstrate that dogs do not actually impact the diversity, abundance and feeding behavior of the birds. The Hatch report observed 5692 dogs and only 19 chased plovers. Your own studies prove that parents with toddlers, surfers and other park users disturbed the plovers far more than dogs, yet I do not see anything in the DEIS that is further restricting their access. Why are dogs being singled out? Your environmental impacts are a whole bunch of "could occur" "may occur" but I do not see a single study that backs this up. You mention Bank swallows, and their nests, but they burrow in the cliffs, areas that dogs simply do not go to. . Ultimately your environmental studies do not seem to support your conclusions and you can be taken to task on this. I have tried to read the DEIS but I have failed to come across any actual solid scientific data that supports your premises. I see a lot of "coulds" and "mays" but no actual evidence and no baselines ? None. In fact, the one study I did read in full ? the one above ? demonstrated exactly the contrary to the "results you would have preferred. You had all the time to back up your claims with hard data. The fact is you have not been willing to do so - discrediting the scientific basis of this DEIS, or, worse still, the data contradicted your preferred solutions, and you have chosen to ignore it. I could not find an comparative analysis of the "No Action" option. The impacts appear based on non-compliance to existing voice control and existing regulations. At some sites, the DEIS prohibits dogs from beach areas to protect shorebirds and stranded marine mammals, yet there is no documentation in the DEIS of current shorebird or marine mammal impacts caused by dogs.

7 So if you have no sound scientific data to support the environmental reason to restrict areas to dogs let's look at the safety issue. Well in this case your data is overwhelming in pointing to what are the causes of serious safety incidents ? 98% DID NOT INVOLVE DOGS. The problem is people, not dogs. Only 2% involve dogs. This alone should really force you to re-think the whole reason for the DEIS.

7 The DEIS is concentrated on dogs, and ignores impacts caused by people and their children, mountain bikers, fleet week, walk-a ?thons, feral cats, coyotes, horses, surfers, etc etc. In other words. The DEIS appears to be a targeted exercise. Not a 360 degree look at the panorama affecting the GGNRA

7 Why is the current system not working for you? Are you able to enforce the current No ?off leash zones? They are 99% of the lands you administer. If you can do it now why the need to change? If you cannot do it now, what additional funding will you require to ensure the new areas will be

enforced?

7 You TOTALLY ignore the impacts that these policies will have on the surrounding areas. If you squeeze dogs out of GGNRA lands will they go? To overloaded City Parks ? Have you involved the City in this plan? You also have totally ignored the beneficial and human impacts of off leash interaction with one's pet. As I mentioned above, My mother cannot run so why are you wanting to limit the dog's exercise level to hers? She currently can play with our border collie and use a chuck-it with minimum effort for her and maximum effort for the dog. When I go to the park I see people playing with the dogs of all ages, races and, presumably, financial background. I do not see anything in your study except a rather curious reference to "minorities" not coming to the parks because of dogs - The DEIS cites a 2007 SF State study that claims all Latinos and Asians surveyed said that dogs were a problem but if you actually read the study you discover some things: a) the study was not, as the DEIS implies an "ethnic minority visitor use experience at the GGNRA" but was actually a study born to help connect minorities to the parks. But more damning the study was hardly a scientific one ? they interviewed fewer than 100 people and they were not randomly selected. It is this kind of "selective" scientific use that will have the words "Drake's Estero" popping up in people's minds.

In conclusion it appears that this is a misguided solution in search of a problem. Your data simply does not support the existence of the problem, and your attempts to squeeze a NPS agenda on local parks is misguided and contrary to the spirit with which these lands were entrusted to you.

The more I look at the lack of data, the more I fear that, what the Dept. of Interior report said about Drakes Estero can be applied to this DEIS and that it exhibits "sloppiness, from a protective approach to data, from a lack of vision, and from an insensitivity to the growing controversy, but not from any obvious intent to deceive, defraud or mislead." I really hope you are not trying to mislead but the lack of any evidence to your premises, causes great reason to wonder if the NPS does have an anti-dog which will be forced upon these Recreational Lands regardless of their negative impacts.

For all the reasons stated above, but in particular for:

- 1) The existence of a "Poison Pill" compliance override on all the alternatives
- 2) The lack of scientific data supporting your premises

I support Alternative A ? the No Action Alternative and would also include New Lands area in that

Respectfully

JoAnne Lee

San Francisco

Correspondence ID: 3596 **Project:** 11759 **Document:** 38106

Received: May,27,2011 12:49:07

Correspondence Type: Web Form

Correspondence: Greetings: I just want to make a brief comment of support for your plans to control off leash dog use in the GGNRA. Everyone has the right to use the trails and open spaces without a dog in company and without the disruptions and dangers that dogs cause to the elderly and to children. Dogs obviously DO cause environmental degradation when there are large numbers of them running around. However, some accomodation has to be made for them but that should not mean unrestrained packs of dogs dominating the public space causing damage to the flora and fauna as well as being a nuisance to people. I like dogs too but there are too many of them in our public spaces, beaches, trails.

Correspondence ID: 3597 **Project:** 11759 **Document:** 38106

Received: May,27,2011 13:12:45

Correspondence Type: Web Form

Correspondence: I am writing to oppose the entire DEIS plan put forth by the National Park Service in regard to the Pet Policy in the Golden Gate National Recreation Area. The plan, as proposed, creates a Hobson 's choice for the hundreds of thousands of park visitors who choose to recreate with dogs. You have developed a means to completely remove a historic use of the park and communities that are created by that use.

I no longer live in San Francisco, being priced out by the economy and my profession and have not been to Fort Funston or Crissy Field since October 2009. I left San Francisco in February 2008 after my dog, Sport, had to be put to sleep as a result of a dreadful illness that may have been caused by the Cosco Busan spill in November 2007. I am also a member of the Dolphin Swimming and Boating Club and we were advised not to swim because of the spill. Perhaps the NPS should be more concerned about bird and native plant health because of the toxins of the industrial uses of the San Francisco Bay area instead of dogs ? a native species.

In my return to San Francisco, I was greeted as an old friend by hundreds of people at Fort Funston and Crissy Field who knew me and my dog Sport.

By taking away the ability to exercise and socialize our animals in the GGNRA, you will be taking away a fundamental Constitutional right ? the right of free association. In the eight years that Sport and I visited Crissy Field, Ocean Beach or Fort Funston twice daily I created an amazing community of friends. Friends I still have today. These friends were of all ages, races, ethnicities, genders, sexual orientations and economic statuses. These friends got me through the grief and trauma of years of watching my friends die from AIDS that no support group or therapist could. I, like so many of my dog walking friends, were very conscientious about our dogs' behaviors towards birds, park visitors, and poop. The NPS, in this poorly constructed plan, are clearly trying to completely remove all dog owners, dogs, dog walkers or any other people who enjoy dogs from the GGNRA.

I had several incredibly poor interactions and tickets issued to me by Enforcement Ranger Eric LaSalle in the early 2000s and fear for the safety of my friends who continue to walk their dogs off leash. Ranger LaSalle was disciplined due to his behavior towards me by the NPS. However, in the future, Enforcement Rangers will have a free hand in enforcing the rules and they carry weapons. This most certainly is going to end poorly.

The GGNRA is located in a crowded urban area. It is not a pristine wilderness. It does not meet the same requirements of some of our "national treasure" National Parks such as the Grand Canyon, Yosemite or Yellowstone. Oh, right ? those "national treasures" are paved over, full of traffic and were so over managed in the early days that many native species were killed (mountain lions and wolves) as nuisances. I do not trust the NPS and its ability to manage our wild areas of the country. Why, all of the sudden is the GGNRA of such great importance as a wildlife habitat? The majority of the lands in San Francisco that were given to the Park Service could be deemed Superfund sites due to the lead levels because of their histories of being military bases.

The simple reason the National Park Service wants the GGNRA to be a "plant museum" is to make money. Property in the Bay Area is some of the most valuable property in the world. What better way to make money for the NPS than by creating off limits spaces for regular people and then creating "lodges," conferences centers and pay-per-use access to these lands as is happening in the Presidio and Fort Baker. Without the same people seeing the changes that the NPS attempts to put in place and protesting them ? the NPS can go ahead and continue to restrict access to more and more public lands.

I fully oppose the entirety of the DEIS.

Jennifer Finlay Asheville, NC 28803

Correspondence ID: 3598 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean,

My name is Betty Wong, a native and resident of San Francisco, CA. My neighborhood is Glen Park. My dog visits the Fort Funston area on any every day basis.

We are an Asian American family with seniors who love the off-leash area of Fort Funston for our dogs to run.

We do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No

Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Betty Wong San Francisco, CA 94131

Correspondence ID: 3599 **Project:** 11759 **Document:** 38106

Received: May,27,2011 13:18:29

Correspondence Type: Web Form

Correspondence: I am a resident of San Francisco, a lover of the outdoors, and a responsible dog owner. I take my dog to play off leash at Fort Funston at least once a week, rain or shine. On occasion, I also take my dog to Crissy Field. First, I would like to comment on the Dog Management Plan in general and then specifically on Crissy Field and Fort Funston.

In general, I find that the Preferred Plan to be overly restrictive, non-inclusive, and borderline belligerent towards responsible dog owners who use GGNRA land. I am most concerned about the "Compliant-Based Management Strategy." I see no reason why this was included in the Plan other than the GGNRA positioning itself towards an outright ban on off leash areas. The inclusion of the "Compliant-Based Management Strategy" is a combative and unfair gesture against the majority of dog owners who use GGNRA land responsibly. The GGNRA is not a national park, nor should it strive to become one, and the "Compliant-Based Management Strategy" should be absent from any final plan that is adopted.

I understand that some people do not care for dogs as much as I love spending time with my dog off leash, and the problem for the GGNRA is where these two groups meet on GGNRA land. A prime example of this is Crissy Field. Crissy Field is enjoyed by locals, tourists, runners, bikers, families, children, sunbathers, kite-fliers; the list goes on and on. Because it is a popular multi-use recreation area with people who do and don't like dogs, I can understand a need for designated off leash and on leash areas at Crissy Field.

However, Fort Funston is completely different. In general, it is nowhere as popular as Crissy Field. Furthermore, the overwhelming majority of people who do visit Fort Funston are there to take their dog off leash. The park is also big enough that those who do not care for dogs can easily enjoy one of

the great areas away from the majority them, like the bluffs or on top of the battery. Because Fort Funston not a popular, multi-use recreation area, I see no reason to designate an on-leash area. I lived 6 years as a dog owner in the dog-friendly Pacific Northwest, and in my opinion Fort Funston is the best place for off leash dog walking that I've been to. It should stay that way.

I sincerely hope my comments and the constructive comments of other responsible dog owners show the GGNRA that although action is needed, compromises should also be made. One of the best compromises I can think of adoption of the Preferred Alternative at Crissy Field in return for the adoption of Option-A at Fort Funston, keeping it the best off leash area on the West Coast.

Correspondence ID: 3600 **Project:** 11759 **Document:** 38106

Received: May,27,2011 13:20:02

Correspondence Type: Web Form

Correspondence: I have been burglarized 3 times--twice while I was in my house alone. I have since gotten a dog and an alarm system. I rely on my dog to warn me of any potential intruders; the alarm system only works once someone has set it off---it does not warn me of potential threats, which my dog does. The police did nothing after each burglary as they had "more important cases to handle". Getting a dog turned into a necessity rather than a luxury.

Owning a dog implies a commitment to treating the animal well. That entails giving the dog sufficient exercise. If GGNRA enacts its current proposal, I will have no where to take my dog for exercise. Those areas that will be left, will be overrun by the 100,000+ dogs that reside in this city.

I need the protection of my dog and my dog needs to be treated well and get the exercise she needs. Without that, I run the risk of my dog changing her nature and becoming more aggressive and less reliable which puts me at risk.

GGNRA has not substantiated that there is actual damage from dogs. It has implied that there might be. Before we eliminatae dogs from these areas we need to be assured that there is actual damage that can not be avoided by some other means.

Correspondence ID: 3601 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 27, 2001 Frank Dean, General Superintendent Golden Gate National

Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, I am writing to you with concern and opposition to the GGNRA's preferred alternative in our area of Pacifica in San Mateo County. Our family walks our dog almost daily on the lands of Sweeney Ridge, Mori Point, Rancho Corral Tierra and occasionally in the San Pedro Highlands. These areas have been open to dog walking for many years and have been a great area for recreation and source of joy for our family. We have been lucky to enjoy the environmental and historical beauty of these lands while exercising with our dog. I understand the need to protect fragile areas and balance public recreation needs but it feels we are being excluded from use of this public recreation resource with years of use and very little impact in these areas. I would hope better signage and enforcement could accomplish your goal without restricting the areas we are currently able to bring our dog. Please continue to allow us to recreate with our dog in the GGNRA. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Aaron

Read Pacifica, Ca 94044

Correspondence ID: 3602 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27, 2001 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to you with concern and opposition to the GGNRA's preferred alternative in our area of Pacifica in San Mateo County. Our family walks our dog almost daily on the lands of Sweeney Ridge, Mori Point, Rancho Corral Tierra and occasionally in the San Pedro Highlands. These areas have been open to dog walking for many years and have been a great area for recreation and source of joy for our family. We have been lucky to enjoy the environmental and historical beauty of these lands while exercising with our dog. I understand the need to protect fragile areas and balance public recreation needs but it feels we are being excluded from use of this public recreation resource with years of use and very little impact in these areas. I would hope better signage and enforcement could accomplish your goal without restricting the areas we are currently able to bring our dog. Please continue to allow us to recreate with our dog in the GGNRA. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA

was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Emily Read Pacifica, Ca 94044

Correspondence ID: 3603 **Project:** 11759 **Document:** 38106
Received: May,27,2011 13:52:07
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area? Fort Mason, Building 201 San Francisco, CA 94123-0022

May 27, 2011

Dear Mr. Dean, My name is Jocelyn Saidenberg and I work for the San Francisco Public Library as a branch librarian. I currently own a beautiful collie-mix dog whom I adopted from a shelter. I have lived in San Francisco for 18 years, and one of the main attractions that lured me here, and keeps me here, is the ability to run and walk with my dog in so many beautiful green spaces. I run and walk with my dog, very responsibly, in many of the areas that are part of the GGNRA. Crissy Fields, Fort Funston, Baker Beach, Lands End, Ocean Beach are all places I visit with my dog weekly. At least ten times a year, I take hikes with my dog in the Marin Headlands and along Rodeo Beach. Being able to run and walk with my dog off-leash in natural areas is an essential part of how I live and thrive and is an essential part of how my dog lives and thrives. This is true for so many others, human and animal, in the Bay Area. It is integral part of what makes for healthy communities. I am a member of the Green Party and other local environmental organizations, such as the local chapter of the Sierra Club. I am deeply concerned about our planet and the environment, yet I am also certain that healthy living in a complex urban area means providing a diversity of recreational activities, including responsible off-leash areas for dogs and their owners. I do not agree with the Golden Gate National Recreational Area's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options

(besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use which includes dog-walking access with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. After careful consideration, I support the "No Action alternative." Thank you for your consideration.
Sincerely, Jocelyn Saidenberg

Correspondence ID: 3604 **Project:** 11759 **Document:** 38106

Received: May,27,2011 13:58:18

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Building 201, Fort Mason

San Francisco, CA 94123-0022

Re; Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I am a San Francisco Resident that has, since moving to San Francisco enjoyed a number of the GGNRA areas under consideration ? in Particular Rodeo Beach in Marin, Lands End, Baker Beach, Crissy Field, Ocean Beach and Fort Funston in San Francisco.

With My husband I am also a ten year volunteer at the Marine Mammal Center in the Marin Headlands, I know and appreciate your work, and that of Brian O'Neill, for all the support the GGNRA has given to the TMMC over the years.

However I am dismayed at the DEIS and much opposed to the changes proposed for both generic and specific reasons which I will try to address.

7 I have a very active dog, a Border Collie rescue Mix, and being active it requires DAILY running. This running is done by myself and/or our Dog Walker. She is insured and Bonded and, and I am sure of her professionalism. Everyone who knows dogs knows that a tired dog is a relaxed dog, and a relaxed dog is a well behaved dog. Off Leash exercise is so much more than on leash exercise. On leash exercise limits the dog to my level of fitness, and that means that by forcing on leash requirements you are binding the exercise of many dogs to that of handicapped, and elderly

owners. My dog "forces me" to go out every day and take a walk, and although that can be in my local neighborhood it is nothing like our walks in the Marin Headlands, or Lands End paths, or along Crissy Field. Off leash walking is my time with my dog. He is always under voice control because my time at the park is my time with him ? we "work" together. These moments when my dog runs back and forth with a stick in his mouth are the reason I get in my car and go the GGNRA controlled lands. I always carry two rolls of poop bags on my leash and I will clean up other dogs poop if I find it when cleaning up after mine. I also participate in dog owner's park cleanups, be it in the City or out at Funston.

7 The concept of ROLA is astonishing. As far as I can understand The NPS self appoints itself to monitor a compliance level of 75% based on total dogs observed not in compliance . Who does the observing? A third party? When do the observing? Of course, for it to be legal I presume it will be done for 365 days every day from 5 am to 10pm when the parks close, because, if there is no one there to observe and 100 dogs use the park, and are in compliance they will not be tallied, which means your data is invalid. As you can see ROLA is non-sensical in the way you define it, in the way you set it up to self police, but even more so in the way you ascribe to yourself the powers to make reductive changes to the use of the park without proper due process. The Poison pill has to be eliminated from the plan as it is unenforceable and lacks any kind of scientific basis (unless, of course you can observe all users all the time)

The fact that this NOLA Compliance based criteria is included in all options automatically disqualifies your alternatives

7 The DEIS does not seem to consider demographics: Answer a question ? is dog ownership in San Mateo/San Francisco County/Marin increasing or decreasing? All the studies I have seen it is increasing. Therefore, as caretakers for lands given your trust for recreational purposes by those counties should you not take that in consideration and offer an alternative where you INCREASE off leash areas? Off leash areas, at the time of the 1979 Pet Policy was limited to only 1% of all the lands you administer. Since then new land has been added but you have DECREASED the percentage of those lands to below 1%. Why is there no alternative where you reflect demographics and the desires of the citizens of those counties who gave you the land and offer another alternative where you increase these lands? Alternatively, since you only have 1% of lands open to dogs, why not, if you take certain areas away can you not have an alternative where you give back other lands now currently closed? I would have loved to have seen somewhere in the DEIS something along the lines of "We are proposing removing XXXX from off-leash areas, but are opening up YYYY

to off-leash use."You have the space. Why not use it?

7 Your purposes, for the GGNRA is for RECREATIONAL purposes. These lands are NOT National Parks ? they are ex army installations and they were given in trust for you to administer in keeping with the original deed. You appear to treat Recreation as having an inverse impact on the areas under consideration, ignoring that Recreation WAS and IS one of the four outstanding values mentioned in the 1972 enabling legislation I quote : "maintenance of needed recreational open space". When Daphne Hatch your chief of natural resources management and science at the GGNRA says Quote: "Ocean Beach without the people is an incredible habitat, But people think of it as a sandbox or their backyard." I truly wonder if the NPS knows the difference between Yosemite and Fort Funston or Ocean Beach". When I attended one of you open houses I was told that I was told that NPS is mandated by Congress to "manage uniformly all its areas" she forgot also to tell me that Congress added "The authorization of activities shall be construed and the protection, management, and administration of these areas ? shall not be exercised in derogation of the values and purposes for which these various areas have been established". So there is no mandate to match the GGNRA's policies with National Park Service requirements that dogs not be allowed off-leash in a national park.

7 Snowy Plovers: Your own research - Forrest Cassidy St Clair and Warren all demonstrate that dogs do not actually impact the diversity, abundance and feeding behavior of the birds. The Hatch report observed 5692 dogs and only 19 chased plovers. Your own studies prove that parents with toddlers, surfers and other park users disturbed the plovers far more than dogs, yet I do not see anything in the DEIS that is further restricting their access. Why are dogs being singled out? Your environmental impacts are a whole bunch of "could occur" "may occur" but I do not see a single study that backs this up. You mention Bank swallows, and their nests, but they burrow in the cliffs, areas that dogs simply do not go to. . Ultimately your environmental studies do not seem to support your conclusions and you can be taken to task on this. I have tried to read the DEIS but I have failed to come across any actual solid scientific data that supports your premises. I see a lot of "coulds" and "mays" but no actual evidence an no baselines ? None. In fact, the one study I did read in full ? the one above ? demonstrated exactly the contrary to the "results you would have preferred. You had all the time to back up your claims with hard data. The fact is you have not been willing to do s - discrediting the scientific basis of this DEIS, or, worse still, the data contradicted your preferred solutions, and you have chosen to ignore it. I could not find an comparative analysis of the "No Action" option. The impacts appear based on on non-compliance to existing voice control and existing regulations. At some sites, the DEIS prohibits dogs from beach areas to protect shorebirds and stranded marine mammals, yet there is no documentation in the DEIS of current shorebird or marine mammal impacts

caused by dogs.

7 So if you have no sound scientific data to support the environmental reason to restrict areas to dogs let's look at the safety issue. Well in this case your data is overwhelming in pointing to what are the causes of serious safety incidents ? 98% DID NOT INVOLVE DOGS. The problem is people, not dogs. Only 2% involve dogs. This alone should really force you to re-think the whole reason for the DEIS.

7 The DEIS is concentrated on dogs, and ignores impacts caused by people and their children, mountain bikers, fleet week, walk-a ?thons, feral cats, coyotes, horses, surfers, etc etc. In other words. The DEIS appears to be a targeted exercise. Not a 360 degree look at the panorama affecting the GGNRA

7 Why is the current system not working for you? Are you able to enforce the current No ?off leash zones? They are 99% of the lands you administer. If you can do it now why the need to change? If you cannot do it now, what additional funding will you require to ensure the new areas will be enforced?

7 You TOTALLY ignore the impacts that these policies will have on the surrounding areas. If you squeeze dogs out of GGNRA lands where will they go? To overloaded City Parks ? Have you involved the City in this plan? You also have totally ignored the beneficial and human impacts of off leash interaction with one's pet. As I mentioned above, My mother cannot run so why are you wanting to limit the dog's exercise level to hers? She currently can play with our border collie and use a chuck-it with minimum effort for her and maximum effort for the dog. When I go to the park I see people playing with the dogs of all ages, races and, presumably, financial background. I do not see anything in your study except a rather curious reference to "minorities" not coming to the parks because of dogs - The DEIS cites a 2007 SF State study that claims all Latinos and Asians surveyed said that dogs were a problem but if you actually read the study you discover some things: a) the study was not, as the DEIS implies an "ethnic minority visitor use experience at the GGNRA" but was actually a study born to help connect minorities to the parks. But more damning the study was hardly a scientific one ? they interviewed fewer than 100 people and they were not randomly selected. It is this kind of "selective" scientific use that will have the words "Drake's Estero" popping up in people's minds.

In conclusion it appears that this is a misguided solution in search of a problem. Your data simply does not support the existence of the problem, and your attempts to squeeze a NPS agenda on local parks is misguided and contrary to the spirit with which these lands were entrusted to you.

The more I look at the lack of data, the more I fear that, what the Dept. of Interior report said about Drakes Estero can be applied to this DEIS and that it exhibits "sloppiness, from a protective approach to data, from a lack of vision, and from an insensitivity to the growing controversy, but not from any obvious intent to deceive, defraud or mislead." I really hope you are not trying to mislead but the lack of any evidence to your premises, causes great reason to wonder if the NPS does have an anti-dog which will be forced upon these Recreational Lands regardless of their negative impacts.

For all the reasons stated above, but in particular for:

- 1) The existence of a "Poison Pill" compliance override on all the alternatives
- 2) The lack of scientific data supporting your premises

I support Alternative A ? the No Action Alternative and would also include New Lands area in that

Respectfully

JoAnne Lee San Francisco

Correspondence ID: 3605 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean,

My name is Stephen Liu and I am a San Francisco Bay Area native for over forty years that uses Crissy Field, Fort Funston, and other GGNRA parks during the year. I take my Nemo my dog out every day for running and exercise and we appreciate the off leash areas we have in San Francisco. My Nemo is 110 lb Labrador retriever that needs his exercise and when we are out we enjoy the outdoors and the windy paths we travel during our outings. We take care of the environment and are respectful to the area around us. Please do consider reversing the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these

important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely,

Stephen Liu Daly City, CA 94015

Correspondence ID: 3606 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Comments on GGNRA Draft Dog Management Plan DEIS

To: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

From: Eddie Bartley San Francisco, CA 94107

Dear Superintendent Dean,

First off, thank you for extending comment period for the GGNRA Dog Management Plan as the extra time has provided me more opportunity to consider such a wide ranging issue from a variety of perspectives and counter-points. Even though my overall conclusion remains very similar to where it began, at least I feel I have a better understanding of the perspectives of those with opposing views and the intricacies of the plan

itself.

I am in support of adopting a Dog Management Plan for the GGNRA. My interests in the GGNRA are as a San Francisco resident, natural history educator, a frequent park visitor and a volunteer participating in many public and private wildlife monitoring programs in the Golden Gate National Parks. For many decades I have enjoyed these parks for unique opportunities to experience natural and cultural resources and I applaud the values and spirit of our National Park System and its mission to "preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations."

The assessment that these natural and cultural resources and park visitor experiences have been, and continue to be, negatively impacted by the presence of substantial quantities of domestic dogs, both on-leash and off-leash, within the GGNRA is not only correct but abundantly obvious. Due to gradual but persistent societal changes, the sheer number of dogs in our region has grown to the point where having an experience or providing a nature education program in the GGNRA without disruption by dogs has become rare. Indeed, whether leading groups of students to learn more about the amazing variety of wildlife in the parks or performing nest or population studies of birds many of us are effectively excluded from some areas of the GGNRA in pursuit of our own studies and recreation. For example: Most of Ft. Funston has become a "no go" area for studying and appreciating wildlife. No way would I lead a group or take a nature class there. The possibility of a conflict with dogs is almost guaranteed with a group of students holding binoculars or carrying tripods. Many dogs somehow see tripods as a threat and often act quite aggressively around them. Sure, the majority of the dogs are well socialized and not a problem but a substantial number of them are not. Dogs are a predator species after all and the introduction of tens of thousands of these animals into some of our most sensitive wildlife areas has predictably become a huge challenge for our native species as well many of whom are already dealing with significant habitat losses.

Perhaps in part because I'm a local naturalist, friends and students have shared many, many stories unprompted by me of conflicts they have experienced or observed between dogs and wildlife and dogs and people in the GGNRA. Most all of these conflicts could have been avoided had the dog owners had control of their dogs but after years of studying this issue I don't see any improvement in those odds. Frankly, in my opinion, the fact that out of 120,000 plus dogs in San Francisco less than 12% of them are licensed goes a long way to arguing that dog owners in general are not showing the level of social responsibility that should be expected of our citizens here. These facts are directly from studies performed by San

Francisco Animal Care and Control.

From a personal perspective I am grateful for the National Park Service's willingness to try to bring in all of the different shareholders and interest groups comments and opinions into the negotiation stage of the GGNRA Dog Management Plan. I certainly do not envy you your task! Naturally, many dog owners are feeling very defensive about criticisms they feel are leveled against them and their charges. Other dog owners are on the offensive and lining up attorneys (as well as lining their pockets) to take the NPS to court over whatever decision is finalized. Environmentalists and wildlife conservationists have been taking it on the chin being called "dog haters" and worse. As one of this latter group I find those charges ironic and absurd. A wild animal enthusiast who doesn't care for the welfare of all animals, including domestics, would be a rare person indeed in my experience. I find myself of the same mind as many of my colleagues and friends: I love dogs and am concerned for the well being of our faithful companions, but have become alarmed about the well being of our local wildlife and the worrisome declines in so many native species.

While I am supportive of many aspects of the Preferred Alternative, I have the following comments to offer:

General Comments

The DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) is inadequate: Factually erroneous statements in the report about the historical and current status of the Western Snowy Plover are particularly egregious. Snowy Plovers formerly nested in The Presidio and in fact The Presidio is the Type Locality of the Snowy Plover (Trowbridge, May 8, 1854). Omission of sighting vetted scientific studies regarding the impact of dogs on natural and cultural resources has led to misinformation and speculation of statements in the DEIS. Neglecting to provide "Criminal Incident Records" for recent years (2009 & 2010) in a timely manner despite Freedom of Information Act requests was another important omission of the DEIS.

Voice Control is not a valid method of controlling off-leash dogs: This fact is abundantly obvious from a visit today to any of the popular off leash dog areas, especially beaches. Yes, a minority of dogs do respond well to voice control, but the vast majority respond only when the dog wants to. There is much more yelling by dog owners than obeying and this in itself has a negative impact on other visitor's park experience. Particularly disruptive is the commercial dog walker's activities.

Shorebirds are the species most affected by the presence of dogs: The plan in general does not adequately provide shoreline that is free from off-leash

dogs. It is clear based on abundant scientific studies that all species of shorebirds have experienced declines in populations and many such as the Western Snowy Plover are now at imminent risk of extinction unless we do a better job of protecting places where they live. Loss of appropriate nesting habitat is a primary reason found for the declines but also losses of feeding and resting locations of which there are many within the GGNRA. I urge your team to reconsider the alternative plans based on this urgent need for protected shoreline, especially beach areas. Upland habitat is important also but due to the popularity of beaches this habitat is where the largest burden falls on shorebirds. I see that the Dog Owners Groups are calling for "Their 1%" of access to recreate their dog's off-leash. One minor point here is that of the entire park only about 3% is open even to humans so that would be about 1/3 of space shared with off-leash dogs. Indeed it is practically every trail. While I strongly disagree with the entitlement mentality of their demand I suggest an easy solution: let the conservationists pick which areas that 1% can be. There won't be much beach access.

How will this plan affect other National Parks? I have overriding concerns about how the final ruling will impact visitors experience at all National Parks, not just the GGNRA. Will emboldened dog owner groups now challenge the pet management rules in all National Parks? Will we be confronted with off leash dogs chasing wildlife in fresh water meadows while hiking a boardwalk in Yosemite Valley? Oh wait a minute, I've already experienced that just last year. Will Park Rangers be hamstrung by too many areas where dogs are allowed and dog owners who pretend to not understand the rules?

As the Park Rangers know well, the level of difficulty for enforcement grows exponentially when the delineation of areas of different rules is not made abundantly clear. A streamlined approach of a few areas where dogs are allowed (off leash or on) and the majority of areas where no pets at all are allowed would not only ease the ranger's burden but allow the majority of park visitors who are pet free to enjoy a much more natural and peaceful experience. Currently a small percentage of park visitors are commanding a much higher percentage of the park's burden, causing much displacement of wildlife and excluding many visitor's by bringing domestic pets into nearly the entirety of the publicly accessible portions of the GGNRA. Based on the principles of democracy a much more fair and egalitarian approach would be to limit the small percentage of visitors who are bringing their pets into the park that same percentage of space that is available to all visitors. Legally there is no civil right for these pet owners to bring their pets into the National Parks at all. Once again, per the NPS Mission, these Parks have been set aside to "preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations." This mission does not include resource extraction, harming or impairing these resources which is occurring

currently under the present situation.

Commercial dog walking should not be allowed. Commercial dog walking does not relate to the purpose and mission of the National Parks.

Commercial dog walking provides no service or benefit to park users, has negative impacts on park resources and park visitors, and serves only for the capital gain of private enterprises at the expense of the American public.

Commercial dog walking will require additional annual expenditures for administering and overseeing a permitting process, additional law enforcement, additional resource maintenance and additional public relations.

The DEIS estimates that over 1000 dogs will be commercially walked within the GGNRA daily (p. 63 p. 276). Commercial dog walkers, with up to six dogs, will negatively impact the experience of park visitors on trails and in other areas of the park. If permitted, commercial dog walking activity will increase within the GGNRA and will displace park visitors, of all legitimate user groups, from areas of the park. Commercial dog walkers will dominate the ROLAs, displacing other park visitors. Commercial dog walking vehicles will occupy parking spaces resulting in fewer spaces available for park visitors. If allowed, commercial dog walking operations will have a dominant presence in some areas of the park thus affecting the overall character and ambiance of those areas.

Currently, commercial dog walking is not permitted within the GGNRA or any other National Park unit and there is no justifiable reason to do so. The NPS is well within the scope of its management directives to not allow commercial dog walking and I support this position.

Park visitors should be limited to two dogs per visitor. On trails, visitors with more than one dog have a wider space requirement and have the potential to impact other park visitors by impeding their progress along the trail. In ROLAs, it is not practical to allow voice control of more than two dogs per person. With few exceptions, dog handlers are not capable of managing more than two off-leash dogs at a time.

The proposed compliance percentage of 75% is too low. Given that many hundreds of dogs are walked within the GGNRA daily, a 25% non-compliance tolerance would create a situation where park resources are significantly negatively impacted. The expectation should be that non-compliance is a rare occurrence and the compliance strategy should reflect that in its standard. The standard of compliance should be the same as for any other park rule or law. An acceptable rate of compliance is somewhere near 100%. Anything less than 95% compliance will be seen as incompetent

enforcement and encourage some dog owners to not comply with the rules.

A simple and effective reporting system should be established. The dog management plan should include a means by which park visitors can easily and effectively report non-compliant behavior. Park visitors are sometimes reluctant to report observed violations due to the time involved in making the report. A public reporting system should be incorporated into the plan that will be user friendly and workable. Such a system should require only a few moments of time and be an effective documentation of the violation.

The plan does not provide an adequate amount of hiking trails and picnic areas where visitors can enjoy a dog-free, National Park quality experience. Within San Francisco, the plan provides no significant area where park visitors can spend the day hiking and/or picnicking in a dog free environment. A solution to this problem would be to designate all of the coastal bluff areas, from the Golden Gate Bridge to and including Baker Beach, as a dog-free zone.

Sites Specific Comments

Ft. Mason ? I support the Preferred Alternative with the following changes: no commercial dog walking, two dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Field WPA ? The DEIS indicates that the east boundary fence will be relocated 200 feet eastward at a position 900 feet from the NOAA pier (p. 60). The language of the plan should allow the National Park Service flexibility in determining the exact location of the fence and consideration should be given to the visual penetration effect as well as the geographical conditions of the immediate area.

Under the preferred alternative, off-leash dog activity directly adjacent to the east boundary fence will pose a visual threat that will penetrate into the Wildlife Protection Area, effectively rendering a portion of the eastern WPA as non-viable habitat during daytime use hours. Given this concern, the fence should be placed a reasonable distance eastward, beyond the actual 900 foot border line, to allow for an adequate buffer zone.

Additionally, the geography of the area of fence placement is somewhat complicated by non-uniform conditions which include a variety of substrates, varying elevations, several lobes of fenced dune habitat areas, and a variety of pedestrian pathways. Consideration should be given to all of these conditions and fence placement should be such that will accommodate ease of pedestrian traffic flow while maintaining adequate protection of the WPA. When installed, the fence should extend to the water at extreme low

tide.

Crissy Central Beach ? The Central Beach ROLA should be fenced and gated. Fences at the west and east ends should extend to the water at extreme low tide. Adequate buffer zones (~300ft) should be included beyond the west and east boundary fences to protect the WPA and the lagoon outlet from the influences of excessive dog play activity. Access points from the promenade should be gated. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Crissy East Beach ? Fencing should be installed to protect the lagoon outlet zone. Outlet areas from bodies of water into bays or oceans are of high habitat value. The outlet zone should be included as part of the protected lagoon area and similarly fenced.

Crissy East of the Lagoon ? The Freshwater Swale should be designated on the area maps as a no dog zone.

Crissy Promenade ? I support the Preferred Alternative with the following changes: no commercial dog walking, two dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Airfield ? The foot paths that cross the airfield are multi-use trails and should be designated as on-leash areas. Allowing off-leash dogs on the airfield trails will lead to user conflicts.

The airfield ROLA should have some type of physical barrier along the boundaries. A physical barrier will clearly define the ROLA area. Clearly defined boundaries will maximize compliance and minimize conflict. Consider a movable barrier that can be set up and taken down as needed. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

The eastern portion of the airfield should be a no-dog area. The Crissy airfield attracts a wide variety of grassland bird species, including rare vagrants, and is a popular venue for wildlife viewing.

Ft. Point ? I support the Preferred Alternative with the following changes: no commercial dog walking, two dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Baker Beach ? The Preferred Alternative for Baker Beach is problematic for several reasons. Splitting the beach into leash-only and no-dog areas will lead to confusion, non-compliance, visitor conflict and continued

management problems. Furthermore, allowing dogs near the creek outlet, an area often used by shorebirds, will increase the potential for wildlife conflicts. As a means of eliminating these problems and of creating more opportunities for visitors to enjoy dog-free National Park experiences, I suggest designating the entire Baker Beach area as a dog-free zone.

Lands End ? I support the Preferred Alternative with the following changes: no commercial dog walking, two dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Sutro Heights Park ? I support the Preferred Alternative with the following changes: no commercial dog walking, two dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Ocean Beach ? I support the Preferred Alternative for Ocean Beach. To improve upon the Preferred Alternative, I suggest using symbolic fencing and adequate signage to delineate the south border of the ROLA. A simple post and cable fence could be placed along the border from the sea wall to the plover sculpture. A well defined border will help to reduce compliance problems and visitor conflict. Additionally, I suggest changing the name "Snowy Plover Protection Area" to "Wildlife Protection Area". A designation of Wildlife Protection Area would be inclusive of all wildlife species that use the beach habitat area.

Ft. Funston ? I support the Preferred Alternative for Ft. Funston. To improve upon the Preferred Alternative, I suggest installing a fence, with access gates and adequate signage, along the border of the ROLA north of the main lot. A borderline fence will clearly delineate the boundary of the ROLA and will minimize compliance problems and visitor conflict. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules. Additionally, I suggest aggressively restoring the coastal scrub habitat throughout Ft. Funston. Plant and animal species, as well as park visitors, have been displaced from Ft. Funston over time as dog play activities have increased. A proactive effort must be made to bring back the visitors who are interested in proper stewardship of this area of the park.

Thank you again for considering my comments on these important issues. Please don't hesitate to contact me to discuss any of these points in further detail.

Eddie Bartley

Received: May,27,2011 14:14:33

Correspondence Web Form

Type:

Correspondence: This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: I have been taking dogs to Fort Funston, Crissy Field, the Presidio, Sweeny Ridge & Mori Point for the last 18 years. In all that time, I have not seen any dogs harm any birds or the habitat. Yes, they chase them, but so do the kids on the beach. Dogs dig in the sand, but so do people. Most dog owners I've encountered from the time my son was born have been nothing but gracious and respectful of me, my dogs and my baby/child. The studies about the plovers and other species are not specific for the GGNRA specifically and the dogs are not harrassing them needlessly.

If you close the GGNRA to dogs it will wreak havoc on the environment in the city and surrounding environs.

Also, dogs and their owners/guardians are the largest users of the GGNRA land and by being there at all hours of the day, they actually deter vandalism by their presence.

Please don't make these drastic changes to the GGNRA dog policy. Thank you for your consideration. Anne Z. San Francisco, CA

Correspondence ID: 3608 **Project:** 11759 **Document:** 38106

Received: May,27,2011 14:19:45

Correspondence Web Form

ce Type:

Correspondence: May 27, 2011

ce:

General Superintendent Frank Dean Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

RE: Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean:

As a concerned citizen, resident of San Francisco and volunteer for the Parks Conservancy, I am writing regarding the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area (GGNRA). I commend the National Park Service staff that have considered dog issues in the GGNRA for many years and have released this plan for our review and comment. I visit, volunteer at, and enjoy the GGNRA lands and am concerned about impacts from dog-related recreation on the wildlife, habitats and other park users at the park.

I strongly encourage the National Park Service to improve the plan by implementing the following:

1. Protecting the park resources is the priority for the National Park Service. Dogs that are not kept leashed chase birds and other wildlife. While dogs are important to many people, they are a single species, *Canis familiaris*. Dogs are having a significant negative impact on the park resources including many species of birds, reptiles, mammals and plants that rely on the park to survive. There are endangered, threatened, and declining species that reside in or migrate to or through the GGNRA lands and depend on this habitat. The recently released 2010 State of Birds Report states "Half of all coastally migrating shorebirds have declined, indicating stress in coastal habitats. See pages 22-23 <http://www.stateofthebirds.org/StateoftheBirds2011.pdf> The negative impact by dogs to the federally listed as threatened Western Snowy Plover has been documented by the Park Service, Golden Gate Audubon, and in other published reports (See http://homes.msi.ucsb.edu/~lafferty/Publications/SnowyPlovers_files/Laff.01.bi olcons.pdf). Domestic dogs also have a negative impact to some human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.
2. All approved "Regulated Off-leash Areas" should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. Today there is much confusion about areas where dogs are allowed off leash. Fences create clear and distinct boundaries so that people with dogs are aware of how to comply with park rules.
3. The proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance.
4. A simple and effective reporting system

should be established. The dog management plan should include an easy and effective reporting method for park visitors to report problems. Today Park visitors are hesitant to report problems due to the time involved in making the report. A public reporting system should be incorporated into the plan that will be user friendly and workable. The reporting system should require only a few moments of time and effectively track and document violations. 5. In areas where dogs are allowed, there should be a maximum of three per person. I regularly observe multiple groups of commercial dog walkers with 10 or 12 up to 15 dogs. Voice and sight control of this many dogs is not possible. With this large number of dogs the dog walker picks up feces from one dog and misses the fact that other dogs are chasing wildlife or defecating. Feces are left in GGNRA lands where it has a negative impact on park users, wildlife, and water quality. See EPA defined dog waste as a non-point source of pollution <http://water.epa.gov/polwaste/nps/whatudo.cfm> and http://www.epa.gov/owow_keep/NPS/toolbox/print/psatpet.pdf http://www.epa.gov/owow_keep/NPS/toolbox/other/KSMO_PetWaste.pdf The San Francisco Public Utilities Company on dog waste and water http://sfwater.org/detail.cfm/MC_ID/14/MSC_ID/118/C_ID/3426 6. Some trails in the GGNRA in San Francisco should be no dogs allowed. Under the current plan, nearly every trail in San Francisco is open to on-leash dogs, thus there are no trails for people who prefer to enjoy the outdoors without interacting with domestic pets. I recommend that the Coastal Bluff Trails be no dogs allowed.

Site Specific Comments

Ft. Mason ? I support the Preferred Alternative B with the following changes: limit of three dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Field Wildlife Protection Area ? The DEIS indicates the east boundary fence will be relocated. The plan should allow the National Park Service to designate the exact location of the fence and signage. The fence placement should be based on protect park resources, habitat requirements, the geography, and last visual aesthetics. Any designated off leash area should not be immediately adjacent to the Wildlife Protection Area. The fence should extend to the water at extreme low tides.

Crissy Central Beach ? In order to make the Central Beach regulated off leash area obviously clear and distinct, post signage with regulations and fence and gate the area. Fences at the west and east ends should extend to the water at extreme low tide. Adequate buffer zones are recommended at the west and east boundary fences to protect the Wildlife Protection Area and the lagoon outlet from dog play activity. Access points from the promenade should be gated.

Crissy East Beach ? Install fencing and signage to protect the lagoon outlet

area. Outlet areas from bodies of water like this (into San Francisco Bay and the Pacific Ocean) are of high habitat value. The outlet area should be included as part of the protected lagoon area and also posted with signage and fenced.

Crissy East of the Lagoon ? The Freshwater swale should be designated as a no dog zone.

Crissy Promenade ? I support the Preferred Alternative C with the following changes: a maximum of three dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Airfield ? The foot paths that cross the airfield are multi-use trails and should be designated as on-leash areas. Allowing off-leash dogs on the airfield trails will lead to user conflicts.

The Crissy airfield regulated off leash area should have a distinct demarcation along the boundaries. A clear fence or other boundary is necessary to clearly maximize compliance and minimize conflict. Signs should clearly identify the area as an off-leash dog play area with posted regulations.

The eastern portion of the airfield should be a no-dog area. The Crissy airfield attracts a wide variety of bird species, including rare vagrants, and is a popular venue for wildlife viewing. I often visit this site to view the migrating hawks in the fall, the Western Meadowlarks each fall through spring, and I had the opportunity to see a rare species ? the Red-throated Pipit, at this site.

Ft. Point ? I support the Preferred Alternative B with the following changes: limit of three dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Baker Beach ?The creek outlet to San Francisco Bay is an area where many shorebirds feed and rest, again an area of important habitat value. All of Baker Beach should be designated as no dogs allowed.

Lands End ? I support the Preferred Alternative B with the following changes: maximum of three dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Sutro Heights Park ? I support the Preferred Alternative E with these changes: maximum of three dogs per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Ocean Beach ? I support the Preferred Alternative C for Ocean Beach. Clear designation or fencing and signage is necessary at the south border of the ROLA. A simple post and cable fence could be placed along the border from the sea wall to the plover sculpture. A well defined border will help to reduce

compliance problems and minimize visitor and wildlife conflicts. Change "Snowy Plover Protection Area" to "Wildlife Protection Area". Wildlife Protection Area more accurately describes the many wildlife species that use the beach habitat area. I recommend native dune plant restoration at Ocean Beach.

Ft. Funston ? I support the Preferred Alternative C for Ft. Funston. To improve upon the Preferred Alternative, I suggest installing a fence, with access gates and adequate signage, along the border of the ROLA north of the main lot. A borderline fence will clearly delineate the boundary of the ROLA and will minimize compliance problems and visitor and wildlife conflicts. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the regulations. The Bank Swallow nesting area should be protected by signage and enforcement.

Last, I strongly recommend restoring the coastal scrub habitat at Ft. Funston. I used to visit Fort Funston to see the birds and marine mammals from the bluffs and beach. Now I do not visit Fort Funston nor do I take friends or visitors to this location as it is a "dogs in control" area. Plant and animal species, as well as park visitors, have been displaced from Ft. Funston over time as off leash dog activities have increased. Dogs and dog owners have caused erosion damage to the Bank Swallow nesting site by scaling the bluff. Shorebirds that have migrated great distances are flushed by off leash dogs. A proactive effort must be made to bring back the visitors who are interested in proper stewardship of this area of the park.

Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measures to protect the National Park's valuable resources for future generations and for wildlife.

Thank you,

Noreen Weeden

Correspondence ID: 3609 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I believe the park's mission is to protect resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog

recreation. Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3610 **Project:** 11759 **Document:** 38106

Received: May,27,2011 14:25:40

Correspondence Type: Web Form

Correspondence: Please do not take the Draconian move of banning dogs from our public spaces. Dogs bring so much joy to lives - study after study shows that people who own pets are happier and better adjusted. People who are out walking their dogs are some of our most responsible, involved citizens: people who love our beautiful Bay Area, care about wellness and health. The vast majority of dog walkers are conscientious - don't punish everyone for the few that aren't. Educate dog owners, enforce fines for the ones who misbehave, but don't just ban everyone. I've lived here my whole life (half a century) and dog owners are far more responsible and engaged than they were in the past. People's lives are tough right now: don't take away a source of joy and happiness. Thank you.

Correspondence ID: 3611 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. I am a dog owner who believes in reasonable laws regarding pets. All of us need to live within the shared space (both physical and cultural) that is the San Francisco bay area. As an environmentalist, it has pained me to watch the way that a rhetoric of "stewardship for the environment" has been selectively mobilized to produce a distorted and biased story about the history and future the GGNRA. The GGNRA can accommodate both recreation and conservation. As I'm sure many of the letters you have received argue, it was designed as an urban recreation area. We need to be able to make real (rhetorical and legal) distinctions between urban outdoor spaces-- like Fort Funston-- and other wilderness. This proposed plan disregards the health and well being of people, dogs, and the community. At worst, this is a power grab masquerading as environmentalism and bureaucratic efficiency. At best, it is an arbitrary plan that excludes the Bay Area residents who exercise regularly with their canine companions. Companion animals are a vital part of many people's lives and well-being. These animals are often the gateway for children into a life long appreciation of non-human life, need, and difference. Please do not diminish the quality of my life by taking away the very small (percentage wise) area that is available to me and my dog for exercise, socialization, and

appreciation of the

In The courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely, Irene Gustafson SF, CA 94110

Correspondence ID: 3612 **Project:** 11759 **Document:** 38106

Received: May,27,2011 14:57:26

Correspondence Type: Web Form

Correspondence: I support more restrictions on dogs in our public parks. I rarely visit Crissy Field because it seems to have become a huge dog park. I used to be a regular visitor; walking, jogging, biking, or windsurfing. But not anymore. My favorite beach is Stinson, because they have dog controls in place. I no longer go camping, because it seems like most campgrounds have poor dog controls. The barking and piles of droppings are what I dislike the most.

Sincerely, David Dryden

Correspondence ID: 3613 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: TESTING: The site was reported to be non-functioning. This is a test.
Howard Levitt

Correspondence ID: 3614 **Project:** 11759 **Document:** 38106

Received: May,27,2011 15:09:19

Correspondence Web Form

Type:

Correspondence: Dear Superintendent Dean,

I am writing to oppose the GGNRA's Draft Dog Management Plan because the proposed Compliance-Based Management Strategy in any of the alternatives because it doesn't take into account of the actual environmental impacts on GGNRA lands.

The document assumes that noncompliance will automatically lead to resource degradation or negative impacts. There is no data or factual statements that support this assumption. This is simply discriminatory towards responsible dog owners like myself, who is the owner of a well-trained dog and under voice control not to chase shore birds and wildlife, as well as pick up other people's trash or dog feces every time I visit the GGNRA lands mentioned above.

I ask that the GGNRA first establish what the existing conditions are, and adopt an Adapted Management Strategy that would monitor the impacts on resources over time, including closer studies of not just impacts caused by dogs, but also humans, other wildlife and nonnative invasive plants. The information must also be fully disclosed to the public in order to come up with a meaningful plan that addresses the issue.

Thank you for your consideration.

Sincerely, Tszsan Kathy Reichardt

Correspondence ID: 3615 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special

Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 3616 **Project:** 11759 **Document:** 38106

Received: May,27,2011 15:18:17

Correspondence Type: Web Form

Correspondence: I am a dog lover, pet sitter and dog trainer. My dog training degree came from an evidence based course. Dogs are social animals and need mental and physical stimulation (evidence based). I take the dog or dogs I am pet sitting (one house-hold at a time) out evenings and weekends for off leash activities to Chrissy Field, Sunset Beach and Fort Funston. Those dogs not able to go off leash take on leash walks in many of the GGNRA areas. I have always cared about the environment and always keep my city clean, recycle and compost.

I like to recreate in the outdoors and want to be with the animals I love. I understand that the existing conditions (1979 pet policy) only gives 1% of the GGNRA for on leash and off leash dog walking. 1% is already such a small percentage and the GGNRA preferred alternative significantly restricts and eliminates off and on leash dog walking in many areas within the GGNRA.

Please keep the 1979 pet policy in place.

Respectfully,

Joan L. Mapou

Correspondence ID: 3617 **Project:** 11759 **Document:** 38106

Received: May,27,2011 15:19:59

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean,

I visit GGNRA almost every weekend with my two beloved rat terriers, Mia

and Luna. It is one of my favorite things in the world to go from Glen Park in San Francisco, where we live, to Ft. Funston or one of the other parks in the area. As a tax payer and a Latino immigrant who is now a naturalized U.S. citizen, I am proud of my tax dollars being used to provide the public with parks that are safe, enjoyable and welcoming of well-behaved off-leash dogs.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely, Jeordan Legon San Francisco, CA 94127

Correspondence ID: 3618 **Project:** 11759 **Document:** 38106

Received: May,27,2011 15:21:27

Correspondence Type: Web Form

Correspondence: To whom it may concern,

My family loves visiting Tort Funston with our dog. We can spend hours roaming the beach and enjoying the beauty of the environment and the fun loving animals. Having an off leash area that allows for total family entertainment is a fabulous addition to our community. The dogs are all friendly and owners responsibly pick up after the dogs. Please keep this treasured location open to off-leash activities.

Warm Regards, Dana Rysavy

Correspondence ID: 3619 **Project:** 11759 **Document:** 38106

Received: May,27,2011 15:46:25

Correspondence Type: Web Form

Correspondence: I love dogs. In fact I own one. My dog does not know how to reason with gamebirds though and it is for that reason sensitive areas such as Golden Gate park- one of the most ecologically diverse areas in our great nation- need to be kept off limits to illogical mutts. I love my companion but I love the bigger picture more...

Correspondence ID: 3620 **Project:** 11759 **Document:** 38106

Received: May,27,2011 15:48:41

Correspondence Type: Web Form

Correspondence: I am writing to express my concerns regarding your proposed closure of most of the areas currently available for off-leash dog-walking at Fort Funston. I have read through the Draft Dog Management Plan and I also attended the Open House at Fort Mason on March 2011. I have been walking my dog at Fort Funston for the last 15 years and am very familiar both with the terrain and with Fort Funston's history with regard to off-leash dog-walking over that period of time. Although I regret GGNRA's proposed dog-walking restrictions in many of the areas covered by the Management Plan, I am limiting my comments to the restrictions proposed for Fort Funston because I believe that they cannot be justified by GGNRA's own research or objectives and will result in significant hardship for San Francisco's dog-owners. Of the available alternatives, I believe that the NPS

should adopt Alternative A (no action) with regard to Fort Funston because it does the most to preserve off-leash areas for dogs. In my opinion, Alternative E is misleadingly titled as providing "Most Dog-Walking Access" because in fact the areas open to dog-walking would be less than those under Alternative A. I urge the NPS to clarify this point to the public and to take the possibility of confusion into consideration when reviewing public support for Alternative E.

Principal Reasons for Favoring Alternative A

- 1. Importance of preserving Off-Leash Areas for Dogs.** Other than the horse, it is difficult to imagine another species that has had as lasting and beneficial a relationship with humans than the dog. It's important that the NPS balance many factors when considering the appropriate use of lands under its purview. However, just as the NPS takes into consideration threats to endangered species, it is entirely appropriate that the NPS also consider our species' obligation to provide adequate exercise for a species whose ongoing contributions to humankind cannot be over-stated. The fact is that requiring dogs to get virtually all of their exercise at the end of a 6' long leash is simply cruel. Dogs cannot get their natural exercise needs fulfilled walking at the pace of a human. The opportunities for off-leash exercise for dogs are already extremely limited in San Francisco and elsewhere and will become more so if the NPS management plan is enacted. Fort Funston has long been one of the few areas in San Francisco where dogs can enjoy off-leash exercise with relatively few negative impacts to the environment and disruption to other users. It should be managed in a way that will allow it to continue to fulfill this important purpose. Indeed, this is a cultural resource in its own right and deserves protection.
- 2. Absence of Critical Habitat Protection.** At the open house held at Fort Mason, one of the senior rangers confirmed that there were few, if any endangered flora at Fort Funston because of decades of urban and natural degradation beginning with the area's use as a military complex. I have also not seen anything in the NPS Report that suggests otherwise, other than declaratory general statements that there would be some adverse impacts. Yet, the NPS's preferred solution would close the entire area to off-leash dog walking. As for fauna, where bank swallows or other birds nest on a seasonal basis, the NPS has a reasonable solution that adequately balances competing interests by simply closing those affected areas on a temporary basis to off-leash dogs or, if necessary, to any dog-walking activity.
- 3. Closure will simply lead to concentrated degradation in areas that remain open.** The extremely limited opportunities for dog-walking in non-urban outdoor spaces in San Francisco will guarantee Fort Funston's continued use as a dog-walking area by area locals, regardless of which management plan is adopted. The NPS's preferred plan, in which off-leash dog-walking areas are restricted to the beach and to one area adjacent to the parking lot, will simply concentrate that usage to a much smaller area, thus magnifying both environmental impacts to the extent that there are any and the likelihood of conflict between dogs and people.
- 4. Closure violates one of the four outstanding values to be protected by the GGNRA in the 1972 enabling legislation.** It is

important to recall that the GGNRA, including Fort Funston, was originally intended as an urban recreation area. It should not be viewed in the same category as other non-urban National Parks covered by the NPS. As an urban outdoor recreation area, it fulfills an important function in allowing urban dogs and their urban human owners a rare opportunity to get out and stretch their respective legs. That function should not be jeopardized or restricted, absent compelling reasons to do so ? reasons which the NPS has not shown with regard to Fort Funston.

Correspondence ID: 3621 **Project:** 11759 **Document:** 38106

Received: May,27,2011 15:58:15

Correspondence Type: Web Form

Correspondence:

As an long-time environmental activist, I am writing to ask you to continue to allow dogs off-leash in Fort Funston. This area is the best dog park in the USA. Please do not ruin it.

Thanks for listening,

Mike

Correspondence ID: 3622 **Project:** 11759 **Document:** 38106

Received: May,27,2011 16:23:19

Correspondence Type: Web Form

Correspondence:

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am a long-time resident of the Bay Area, having moved to San Francisco in 1999 and to Marin in 2009. A large part of the reason that I chose to live in the Bay Area (I am originally from the East Coast) is the natural beauty and accessibility to the outdoors. As many Bay Area residents do, I own a dog, who is beloved and an intrinsic part of our family. We are very responsible dog owners, always cleaning up after our dog no matter where we walk him, making sure that we stay on trails that are indicated for dogs and keeping him on leash when it is required. We are also firm supporters of the environment, and have donated over the last few years to San Francisco

Baykeeper, an organization that is a pollution watchdog for the San Francisco Bay, using science and advocacy to strengthen clean water laws and hold polluters accountable. We also support the Marin Agricultural Land Trust (MALT) which preserves open space for farming, encourages stewardship of the land and discourages development. Clearly, taking care of the environment is a big concern for us.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The GGNRA is the open space for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Specifically in Marin County, I do not think two public ocean beaches that allow dogs off-leash is too many. Keep both Rodeo and Muir Beach off-leash / under voice control. Allow access to humans with dogs on the fire roads and trails that run directly out of the neighboring communities into the GGNRA and to the fire roads adjacent to the surrounding communities that circle the GGNRA. I agree that on-leash makes sense for most of the fire roads, not only for the safety of wildlife, and the maintaining the spirit of sharing the fire roads with others, but also for the safety of our dogs. Maintain that Alta Avenue from Donahue to Orchard Fire Road should remain off-leash / under voice control, as should Orchard Fire Road and Pacheco Fire Road that run up to Alta from Marin City. This area has had

hundreds of dogs each day for years, and it can be argued that the dogs have done little or no damage. Removing this area from off-leash/voice control is not only unnecessary, it does not benefit the NPS in its goal to strike a balance between resource protection and recreation; and it would result in costly enforcement that is not warranted.

Thank you for your consideration.

Sincerely,

Maria Jose Castro-Dara

Correspondence ID: 3623 **Project:** 11759 **Document:** 38106
Received: May,27,2011 16:25:40
Correspondence Type: Web Form
Correspondence: I strongly support restricting dogs, especially off-leash dogs, in sensitive habitat areas. Too many times I have witnessed wildlife being harassed and chased. Habitat and wildlife are precious resources that deserve respect and protection.

Correspondence ID: 3624 **Project:** 11759 **Document:** 38106
Received: May,27,2011 16:29:07
Correspondence Type: Web Form
Correspondence: Hello, I would like to see some places in GGNRA kept open for off-leash dogs, and a greater amount of space open for leashed dogs. I have a small dog (30 lbs) and would like to let her run around on park land. I promise I will clean up after her.

By the way, how do I unselect the Member button if I've accidentally clicked it? There doesn't appear to be any way to undo it.

Correspondence ID: 3625 **Project:** 11759 **Document:** 38106
Received: May,27,2011 16:32:38
Correspondence Type: Web Form
Correspondence: Dogs are GREAT..but unfortunately only have as much common sense & courtesy as their owners. GGNRA areas ought to focus on natural set asides for current and future use, in addition to the historical.

? I've watched owners with their dogs run right through marked areas for Snowy Plovers by Crissy Field, almost belligerently. ? One individual came

out of the redwood stand adjacent to El Polin Springs with 10 dogs; they had been off leash in the stand, wondering about. ? There's plenty of feces along the trails every time I've hiked through the Presidio. ? While I firmly believe most dog owners are conscientious, the sheer number of dogs means every day wildlife is assaulted/hassled throughout the GGNRA. The Presidio in particular can look like a private reserve for dog owners.

As GGNRA Management considers a dog management plan, greater consideration should be given to the following than the draft plan currently does:

? Dogs on trails should be on-leash; it's the only way to ensure wildlife can co-exist in close proximity with dense human populations ? Fenced, large dog run-free areas need to be created throughout the GGNRA ? Beaches: some beaches within the GGNRA lend themselves to leash-free areas, some simply do not. Clear signage delineating such areas would be needed ? Commercial dog walking should be banned from the GGNRA: I don't get to use the area for profit and, without a permitting process, neither does anyone else. ? Cat colonies?? I'm completely unclear as to why there is an exemption for a destructive, feral animal that consumes our native bird/reptile/small mammal populations and has no place in the local ecosystem.

Thank you for the opportunity to provide feedback on the GGNRA Draft Dog Management Plan.

Correspondence ID: 3626 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 3627 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Most dogs do need time off leash.Responsible dog owners are being punished for the very small minority who do not follow the common sense laws like picking up poop.By all means do what must be done to resolve this problem but don't make the rest of us suffer.

Correspondence ID: 3628 **Project:** 11759 **Document:** 38106
Received: May,27,2011 16:44:22
Correspondence Type: Web Form
Correspondence: Please, please do not allow dog owners more use of public lands to have their dogs off leash, Please lessen their off leash dog use as much as possible. As it is, almost every park in the Bay Area is open to dogs, including watershed land, right next to reservoirs. Since dogs carry a number of parasites, the only reason I can imagine for this is the power of the dog lobby.

The few areas requiring dogs be on leash or are restricted to dogs are ignored. When I was a docent with Audubon for the Burrowing Owls in Berkeley, where people had a large off leash area, most still would not put their dogs onleash near the owls.

It doesn't matter how many people are threatened or attacked by dogs, or how many of us plead with dog owners to have control of their dogs, no public area is truly safe. But we have the choice to never go to the parks -- it's even more upsetting for native animals who have no where else to live, who are tormented, injured, and killed by dogs. It's not the dogs' fault -- it's their irresponsible owners. I've been yelled at and threatened when I've politely asked people to respect the no dog areas or leash laws. I've seen people laughing happily when their dog has been mauling young calves on park land. Even when people try to stop their dogs from hurting animals or humans, most have absolutely no control.

Really, we need some place where wild animals and we also are safe from

dogs and dog feces. We need to be able to go to parks and not worry about having to face groups of snarling off leash dogs. The only way for this to happen is to have more laws restricting dog use, and to actually enforce them.

Correspondence ID: 3629 **Project:** 11759 **Document:** 38106

Received:

May,27,2011 16:50:24

Correspondence Type:

Web Form

Correspondence:

I am writing to express my support for developing and adopting regulations that will require dogs to be restrained by leash while in Golden Gate Recreation Area. As a professional dog trainer and free lance writer, I have written on the importance of leashes for the management and protection of dogs. Maintaining dogs safely on leash is vital for the health and safety of humans using the recreation area, wildlife and the dog. Loose dogs can and will pose a risk to visitors in the Recreation Area. A dog jumping on, chasing, startling or even playfully nipping at a runner, rider or cyclist can cause a wide range of injuries. Dogs will chase wildlife and cause damage, disturb natural behavior, injury and potentially death. Wildlife poses a variety of health and safety risks to unleashed dogs. In my region, coyotes have attacked small, unleashed dogs in local parks. There are multiple parasites and diseases that can be transmitted to domestic dogs and the dogs can pass on to humans. It is vital that dogs be restrained with a leash when walking in public areas. However, many owners ignore leash laws. Even in national parks where there is a law requiring all dogs to be on a lead no more than six feet in length, I see constant violations.

If there are designated off leash areas in the vicinity, then dog owners should be directed there. If not, then creating a designated and fully fenced off lead area is a suggestion I would pose. Adopt leash regulations and create a dog-specific area where they can run off lead.

Correspondence ID: 3630 **Project:** 11759 **Document:** 38106

Received:

May,27,2011 16:57:50

Correspondence Type:

Web Form

Correspondence:

Dear National Parks Representatives,

I am writing to strongly urge you to continue to allow off-leash dogs in the GGNRA properties of Sweeney Ridge and Mori Point in Pacifica, CA. Two months ago my family got our first family dog. For the first 6 weeks we ran her every day on-leash only, which was fulfilling for us and seemed to be fulfilling for our dog, at the time.

Two weeks ago, I felt like she was comfortable enough with me and with following basic commands that she could try running off-leash. On our very first off-leash run through Mori Point, I realized that up until this time I had been depriving her of her basic dog rights. What made me realize this was the joy in her face, her stride and demeanor which was displayed by a tongue hanging out of her mouth, a ferociously wagging tail, and vivid dancing eyes. Her bliss was obvious within just a few minutes off-leash.

At this moment, I felt terrible for having deprived her of this experience up until this point. I feel that by running off-leash she is able to explore her environment in a more independent way, however, she is still bound by the invisible tether of being a pack-follower to me. There is something that we cannot quantify, and that is very difficult to describe, but when you see a dog able to fulfill his/her instincts, you will recognize it. The dog will be a happier, healthier, more fulfilled creature for it, and so will you.

I understand that the GGNRA typically requires on-leash dogs for the sake of safety. I can attest that in the 4 years I have lived in Pacifica, and in the two weeks that I have been running my dog off-leash, I have never encountered a malicious, out-of-control dog. The high ratio of open space to people ensures that I don't encounter more than 10 dogs while out running in a 1-hour time period. I feel that this helps to limit any negative, defensive behavior that one might see at other areas (such as Fort Funston). Furthermore, I have never seen handlers with packs of large dogs (Pits, Rotweilers, etc...) using the GGNRA properties in Pacifica to exercise/parade their dogs. I have never felt like my safety was ever compromised in Pacifica due to an off-leash dog.

I feel that it would be a terrible waste of taxpayer dollars to enforce rules that don't need to be made. Please use taxpayer money towards more socially-responsible and necessary programs. PLEASE continue to allow off-leash dogs in Pacifica GGNRA properties!

Thank you, Sarah N.

Correspondence ID: 3631 **Project:** 11759 **Document:** 38106
Received: May,27,2011 17:02:03
Correspondence Type: Web Form
Correspondence: I am writing to comment regarding the proposed changes in accessibility for dogs and their owners to certain areas within the Golden Gate National Recreation Area. Specifically, I strongly object to any change in the permitted uses of Fort Funston.

I hope it is kept firmly in mind that the mission of Fort Funston is in the

name of its umbrella designation ? the Golden Gate RECREATION Area. By that standard, Fort Funston is a great success. What is playing catch or Frisbee with one's dog if not recreation? Recreating at Fort Funston is how I apologize to my dog for the boredom and constraints of his otherwise on-leash life. His recreation ? catching a flying disk, chasing a ball, goading another dog to chase him ? hurts no one. I submit that the positive externalities of this recreation far outweigh the small costs it might entail.

Even a casual look at Fort Funston confirms that it bears little resemblance to a nature preserve. Nature preserves don't have giant concrete edifices named "Battery Davis," or acres of foreign flora like ice plants, or remnants of missile sites. Fort Funston is a former military installation turned recreation area. It should be allowed to function as such, and its function and unique attributes should be understood in the context of the many other places that accomplish other GGNRA goals, but do not allow off-leash dogs.

I am not asking to change the fact that the majority of the public lands in the area do not permit off-leash dogs. It is fair and appropriate to prevent off-leash activity at many public places. I also understand that the presence of off-leash dogs may well make Fort Funston less attractive to some potential visitors. But given the many other places along the coast where off-leash dogs are banned, it is a small inconvenience at best to say, "this one spot is optimized for dog lovers ? if you don't like dogs, go to the next spot up or down the road." The idea that we are being negotiated DOWN from a mere 1% of the GGNRA is, simply, absurd.

Thousands of local residents see Fort Funston as a brilliant amenity exactly as it is. I see more smiles in an hour at Fort Funston than I see the whole rest of my week. That experience relaxes me and lubricates my interaction with the traffic and hassles that come with our densely packed region. Is that not the whole point of recreation ? to make our non-recreational time more bearable?

I am an environmentalist, and heartily agree with the vast majority of efforts to preserve pristine wild places, help endangered species, etc. But Fort Funston is not pristine, and has not been so for a very long time. I have read about a few strained claims of dogs affecting the nesting of a few birds along the cliffs. Those claims ring hollow. The coastline is long; Fort Funston is short. The ecosystem's original contours and rhythms were disrupted decades ago; evicting dogs will not restore them. And if those problems are truly pressing, fencing off those cliffs could address the concern while minimally affecting the rest of the recreation area.

For dog owners, Fort Funston is a unique and nearly magical place ? a place where treasured companions get to briefly sample pleasures usually denied

them by the urban lifestyles of their owners. It is clear that the voices that seek to change the status quo at Fort Funston do not belong to people who appreciate the sight of a dog running after a tennis ball, but that kind of activity is both a source of beauty and pleasure to thousands of Bay Area dog owners, and undeniably a form of recreation.

One of the best things about living in the Bay Area is its tolerance for a wide variety of lifestyles and pursuits. I would not seek to ban horseback riding from the many public lands that allow it, or to prohibit hang gliding from Fort Funston itself. When given room to do so, it easy for multiple practices to peacefully coexist. Fort Funston today is a model of tolerance and community. The proposed changes would make it much less so.

Shutting down this resource will not reduce the number of dogs in the Bay Area, but it will reduce their happiness, and their ability to peacefully co-exist with us and with each other. It will also likely increase the load on the remaining spots where dogs can play. And it is clear that what the proposed plan would do is effectively shut down Fort Funston as a dog park.

I visited Fort Funston before getting my dog three years ago, and saw its availability as an essential part of the equation that made getting a dog work. I take him there almost every week. Without this Fort Funston ? this wide open space ? his life would be much the worse. So would mine.

Correspondence ID: 3632 **Project:** 11759 **Document:** 38106

Received: May,27,2011 17:02:49

Correspondence Type: Web Form

Correspondence: I am writing to support the preferred alternative as presented in the DEIS. Although I have some reservations about all elements of the plan, I believe that it is basically sound and should be supported. I have two dogs and have had several negative experiences while walking my dogs on GGNRA lands. One time, at Fort Funston, one of my dogs was chased in a very aggressive manner by a pit bull and eventually was bitten by this same animal. All this occurred while the owner of the other dog watched from afar as I tried to break them up. The bite drew blood but otherwise didn't hurt my dog badly. However, the interaction with the dog's owner was very disturbing. The man said our dogs were "playing" but I think not and few dog owners would agree that if another animal bites and draws blood that they two animals are playing together. This is one example among many of where there was inadequate control by dog owners over their pets. One other time worth mentioning happened when I took my son to Fort Funston when he was 4 years old. A commercial dog walker was unable to control an animal that lunged at my son to get the stuffed toy in my son's hand. The large dog slammed into my son and caused him to hit his head on the course asphalt

pavement. I called the park police and reported this incident at the time. My son has suffered permanent disfigurement to the forehead from this fall.

In short, I think the NPS needs to put a rule in place that curtails the seemingly out-of-control offleash dog access in some parts of GGNRA to restore a modicum of safe recreational access for all park users. I think this DEIS is going in the right direction, though some relaxation of "no dogs" could occur in some parts of GGNRA lands in Pacifica with no detrimental effect to the natural environment, including listed species habitats. For example, the Baquiano Trail and the Sneath Lane access trail from the parking lot to the Baquiano Trail could be allowed for onleash access.

Finally, I support a carefully analyzed and implemented compliance strategy to ensure full compliance with all rules related to dog management. Things are far to lax now and must be brought under control The basic elements of such an approach are in the plan, but actual implementation is not ensured by simply writing a plan. There must be coordinated follow through with the affected cities and neighborhoods, good signs, and then enforcement. Without this, all the effort expended to date the the NPS will be essentially wasted.

I appreciate all the hard work and extensive analysis that went into the DEIS by the GGNRA and other NPS staff. They are to be commended for this diligence and attention to the complicated social and environmental aspects of this issues.

Sincerely, Paul Jones

Correspondence ID: 3633 **Project:** 11759 **Document:** 38106
Received: May,27,2011 17:27:51
Correspondence Type: Web Form
Correspondence: To whom it may concern,

I am writing to express my opposition to the preferred alternative in the DEIS. I have been a resident of the Marina for 21 years and daily user of Crissy Field and an weekly user of Baker Beach and Fort Mason. For the community of local dog owners, walking at Crissy is an important part of our daily lives and a way to stay in touch with friends and neighbors. The preferred alternatives for all these areas seem unnecessarily restrictive, excluding large areas (such are the airfield) which are rarely utilized by other park users unless there is a weekend event. Although I can understand restrictions on heavily trafficked areas such as the promenade, the proposed restrictions seem excessive. Also concerning is the "poison pill" provision where the NPS reserves the right to rescind all 'off leash' dog walking based

on a single infraction. This is absurd! Are you also similarly proposing to ban all cyclists in the GGNRA if one cyclist exceeds the speed limit or ban all cars if one driver rolls through a stop sign? I doubt it. An anti-dog bias is clearly evident throughout the document. This process is not about finding a compromise, it is about imposing a solution that brings the GGRNA rules in line with existing NP properties, not withstanding the existing mandate to preserve recreational uses that is the foundation of the GGNRA.

Sincerely, Amal Murgian

Correspondence ID: 3634 **Project:** 11759 **Document:** 38106
Received: May,27,2011 17:30:56
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean and other officers of the GGNRA:

I have followed the debate about off-leash dogs in the GGNRA with concern since I belong to several animal protection societies, especially of birds. Let me summarize my points briefly:

1. I applaud your plans to ban dogs from the areas you outlined.
2. Leaving things as they are gives too much discretion to irresponsible dog owners. I am using the word "irresponsible" quite deliberately, having had several unpleasant run-ins with dog owners during my weekly hikes on Mt. Tamalpais. I found some of these people rude or aggressive and unwilling to listen to the reasons I asked them to leash their animals. They were not at all concerned about other creatures and their lives. In fact, when I mentioned plants or flowers, I received comments like "there are so many of those that a few dogs cannot do any damage."
3. I want to **STRESS** that I do now and have owned dogs for the last 30 years and like them very much. But I can honestly say that I always have put them on the leash during my hikes. Dogs are incredibly adaptable. Once they know the routine they enjoy trotting alongside their owner(s) perfectly happily, getting the necessary exercise and enjoying their outing. They do not need to be put in situations where they can bother others or disrupt people enjoying the beach. The same goes for their chasing wildlife. If something moves, a dog will chase it. We all know that. I have seen dogs running after very small fawns, for example, and at times catching sea birds.
4. Rather than demonstrating noisily, dog owners should understand that they are only one constituency privileged to use the magnificent GGNRA for their recreation.

Sincerely, Elisabeth G. Gleason Professor emerita of History University of San Francisco

Correspondence ID: 3635 **Project:** 11759 **Document:** 38106

Received: May,27,2011 17:31:59

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Sincerely,

Maribel Tirado

Correspondence ID: 3636 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: 27 May 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

My dog Dooney and I moved to San Francisco at the end of November. Dooney is a very special part of my life. Although abused as a puppy, and still shy around new folks, she's been my companion for the last 7 years and has been there for me through cross-country moves, personal illness, and a painful divorce. Since moving to SF, however, it seems like we've both found our home. Dooney goes out daily with her dog walker and "pack" - a practice that has really gotten her out of her shell! She seems so much more relaxed and happy. On the weekends, I take her to Crissy Field and we walk along the beach. We sit and watch the Golden Gate - it is our "happy place" and where I go to recharge after the long week. I simply cannot imagine not having access to this beautiful area any more. I realize there are those who argue that the dogs are damaging to the environment, but I disagree! Responsible dog owners care very dearly about the environment. We're the ones who are outside every minute possible enjoying the beauty and sunshine (and even fog) with our four-legged companions.

As such, I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for

these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely, Dori Raymond

Correspondence ID: 3637 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean,

I am an Asian American woman who has lived in both San Francisco and Marin. I love the Bay Area for so many reasons, but one of the main things that makes this place so uniquely special and not just another big urban area is how man, nature, bikes and animals can all share and enjoy the GGNRA.

I purchased my house on the edge of the Marin Headlands because I can walk out my door and enjoy being in nature. I've hiked it, biked it, run it, camped it. It is an integral part of my life. And seeing happy people enjoying it with their dogs is why I now have a dog named Spirit. My husband I consider him our kid. We regularly enjoy all areas of the GGNRA with Spirit--the Marin Headlands, Crissy Field, Fort Funston, Ocean Beach, Muir Beach, Stinson Beach. He has become so healthy and well-adjusted because he gets these many opportunities to exercise and interact with people and dogs.

Through Spirit we, in turn, have become much more educated about the preservation of these places because we are more aware of issues like the current proposal. Spirit has endowed us with an appreciation for animals and nature that goes infinitely beyond the great love we already had before he was around. Most of the people with dogs I know or meet are equally positively affected by their dogs. In contrast, I've observed many uneducated adults and children littering, yelling and scaring wildlife, throwing rocks and sticks at or chasing animals, or cutting trails and causing erosion, leaving big ruts in trails with their bikes. No user group of the GGNRA is perfect. To punish dogs by taking away what little off-leash land they currently have is unreasonable and unfair. It will lead to problems between humans and dogs when dogs cannot be properly exercised and socialized and when

humans are less exposed to dogs and therefore don't have the opportunity to learn how to act with dogs. It is cruel and abusive if dogs cannot get the distance and speed of exercise they need and cannot fully express themselves as dogs. I have lived on the edge of the GGNRA for eleven years and have seen an increase in all forms of traffic on this land--dogs should not pay the price for something that EVERYONE has a part in.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Polly Ing

Mill Valley, CA 94941

Correspondence ID: 3638 **Project:** 11759 **Document:** 38106

Received: May,27,2011 17:34:55

Correspondence Type: Web Form

Correspondence: Please keep dogs on leash and out of most ggnra areas. The only place they should be allowed should be a portion of Ft Funston. There are too many dog messes not cleaned up and for those with fears or allergies to dogs, they are not able to enjoy these areas. Since the resources do not exist to effectively enforce rules or good behavior by the dog owners, not allowing dogs is the best option. Just as i would seem insane for a person to expect to be allowed to walk nude or shoot guns in these area, brining dogs especially off leash is equally wrong.

Correspondence ID: 3639 **Project:** 11759 **Document:** 38106

Received: May,27,2011 17:42:00

Correspondence Type: Web Form

Correspondence: May 27, 2011

Attn: Frank Dean Golden Gate National Recreation Area

Dear Mr. Dean,

I do not support the proposed changes to the 1979 Pet Policy for the GGNRA. I believe there are other ways to preserve natural resources without restricting off leash dog walking areas.

I live on the 8th floor of Opera Plaza condominiums with my 4 legged terrier. For years, every single morning around 6:30 a.m. we go to Chrissy Field and run and walk the beach and trails. This is our back yard. He is off leash for an hour, we both get our daily exercise, and it is pure joy for both of us. There is a wonderful community of responsible and dedicated dog owners who are there every morning. This makes city living possible - and enjoyable - for me. IF there were no off leash areas where we could exercise together and enjoy the surrounding beauty before I go to work every day, I would likely move out of the city.

I support conservation and preservation, but if we can not have access to those areas with normal recreation, doesn't that defeat the purpose of the GGNRA? I am in favor of a program that balances recreation including dog walking, with preservation. I support a modified Alterntaive A - a no action alternative- with improved vegetative barriers and educational outreach for those who may be less responsible. The proposed changes will severely

compromise the quality of my life - and the lives of many other responsible citizen's who live in San Francisco.

Thank you for considering my strong opinion,

Jody Brotman Crissy Feild Dog Group Member

CC: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Correspondence ID: 3640 **Project:** 11759 **Document:** 38106
Received: May,27,2011 17:46:59
Correspondence Type: Web Form
Correspondence: May 27, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

My name is Brian Kurtz and I am a resident of Bernal Heights. Although I utilize my local dog parks including Holly Park and Bernal Hill I make a point of going to Fort Funston at least 3 or 4 times a month. Additionally we have a dog walker who takes our Pug out to GGNRAs quite frequently, a few times a week. As a member of Green Peace, Earth Island Institute and the Sierra Club I do feel as though I have a profound interest in the health of the environment.

As a general rule dog owners tend to be responsible individuals. They take great pride in showing their pets are well behaved and cooperative. Of course there is always exceptions, I am a person who fully believes we need to share the open space with everyone and each of us needs to have respect for the outdoors. We all need to share and interact civilly, on or off leash.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural

resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration.

Sincerely,

Brian Kurtz San Francisco, CA 94110

Correspondence ID: 3641 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I believe we have such a wonderful city and recreation areas here in San Francisco. We are so happy when we are out in the Presidio, Ocean Beach or Fort Funston with our dog Hazel, bird watching, flying kites and sharing BBQ with friends and family...it all happens at once on a very regular basis. Please take this into consideration when you make your decision.

Correspondence ID: 3642 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am a member of the San Francisco Board of Supervisors, representing

e: District 8. I hereby submit the following as public comment.

1. Resolution of the Board of Supervisors opposing GGNRA's current proposal regarding off-leash dogs:
<http://www.sfbos.org/ftp/uploadedfiles/bdsupvrs/resolutions11/r0183-11.pdf>

2. Transcript of hearing on GGNRA's proposal, which occurred before the Board of Supervisors Land Use and Economic Development Committee on April 11, 2011:
http://sanfrancisco.granicus.com/TranscriptViewer.php?view_id=12&clip_id=11927

Correspondence ID: 3643 **Project:** 11759 **Document:** 38106

Received: May,27,2011 18:56:51

Correspondence Type: Web Form

Correspondence: Edward James Kiernan and Libby Kiernan Sausalito, CA 94965

May 27, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean:

I am writing to express my opposition to the proposed rule changes to off leash dog walking in GGNRA. My wife and I reside in Sausalito with our six-year-old Australian Shepherd, who we consider part of the family. We have always been responsible dog owners who clean up after our pet and make sure she does not harass wildlife or people. I has been our experience that our behavior is the norm, as opposed to the exception, amongst dog walkers in the GGNRA, and are extremely upset to learn of the draft plans that would severely restrict our ability to enjoy these recreational lands with our pet.

As it is now, about once a week, we run our dog at one of the areas which now permit dogs off leash, including Muir Beach, which is up the road from us, Crissy Fields, when we visit the City, and, occasionally, Fort Funston and Baker Beach. Because we bring our dog with us almost everywhere we recreate and because she is an active breed that needs exercise, as a practical matter, banning off least dog walking the GGNRA is really a ban on our use of this public property. As a responsible dog owner and tax payer, I find the proposed ban an offensive and arrogant trampling of our rights to enjoy this public land that has been designated for recreational use. My wife and I support preservation of the environment, have participated in beach clean-up events (more than once), and diligently work to ensure both our and our dogs impact on the environment is minimal. However, banning off leash

dog walking, as proposed, is, in our view, a misguided effort to convert these recreational areas within a major urban environment into pristine wilderness, untouched by humans and their domesticated animals. Such efforts, while attractive in the abstract, are both unrealistic and extremist when it is considered that millions of people and their pets live in this region and that this public property was specifically set aside for recreational purposes. The misguided nature of these efforts is all the more apparent when it is considered how well preserved these lands are under the current rules that allow people and their pets (off leash, under voice command), so these proposed rule changes strike us as a solution in search of a problem. Thus, we would like let the record reflect that we do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, we believe other options (besides restricting dog-walking access) should be considered first. We favor an approach that balances recreational use (including dog-walking access) with preservation. We think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not arrogantly assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, we support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. If an effort is made, members of the dog walking public can be partners in preserving these precious lands, whereas the approach now contemplated unnecessarily will alienate a large percentage of those who currently

recreate on these lands.

Thank you for your consideration.

Sincerely,

Edward James Kiernan and Libby Kiernan

CC:

Sausalito, CA 94965 CC: Senator Dianne Feinstein 331 Hart Senate Office Building Washington, DC 20510 Senator Barbara Boxer 112 Hart Senate Office Building Washington, DC 20510 Congresswoman Nancy Pelosi 235 Cannon House Office Building Washington, DC 20515 Congresswoman Jackie Speier 211 Cannon House Office Building Washington, DC 20515 Secretary Ken Salazar Department of the Interior 1849 C Street NW Washington, DC 20240 National Park Service Jon Jarvis, Director 1849 C Street NW Washington, DC 20240 National Park Service Christine Lehnertz, Pacific West Regional Director 1111 Jackson St, Suite 700 Oakland, CA 94607

Correspondence ID: 3644 **Project:** 11759 **Document:** 38106
Received: May,27,2011 18:57:54
Correspondence Type: Web Form
Correspondence: I visited Muir Beach today and saw your request for comments.

I think dogs should be required to be on a leash at all times.

While a dog may be under voice command most of the time, if it gets excited chasing a bird for example, it probably won't be.

Correspondence ID: 3645 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- * Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.
- * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- * Exclude speculative, exaggerated, biased, or misleading statements and studies.
- * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- * Enable professional dog walking and align any professional dog walking rules with county or city regulations.
- * Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: As a native San Franciscan, I am reminded daily of how fortunate I am to have a home town that some people can only dream of visiting. A huge part of that great fortune is the time I am able to spend in the GGNRA with my dog, Joe. He's really at his happiest on the beach, and I am so grateful that we can enjoy that together. We're at Fort Funston and Crissy Field at a couple of times a week. It would be such a great loss to so many if we lost access to

these areas as places to walk our dogs.

Sincerely,

Edward Brauer San Francisco, CA 94117

Correspondence ID: 3646 **Project:** 11759 **Document:** 38106

Received: May,27,2011 19:43:57

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean:

I am a thirty year resident of San Francisco, age 71 years. I live in Cow Hollow where I have owned my own home for 21 years. I also owned a house at Lake Street and 12th Avenue where I lived for 7 years. During these thirty years I have been a constant, responsible and dedicated dog owner. My favorite place to bring my dog is Crissy Field, which is close to my home. There I can walk comfortably, chat with other dog walkers, and my dog is able to run and play with other dogs. These are recreational activities which are extremely important to my health and well being. My dog (and the ones I've had before this one) when off leash is always under my voice control and active visual supervision. I am careful to clean up after him and to respect the fences, signs, and other environmental barriers which protect the birds and plantings which I also greatly enjoy. I have supported and/or been a member of many environmental organizations over the years including (but not limited to) the National Audubon Society, Defenders of Wildlife, the Sierra Club and the Nature Conservancy. Dog walkers of Crissy Field in general are respectful and protective of the natural resources we enjoy along with others who come to the GGNRA. As with any group, there are individuals who err and should be warned and then ticketed, but their misdeeds should not create legislation which is damaging to a very large number of compliant individuals. People with dogs, in my observation, are good stewards of the environment. Often it seems that the dogs themselves, in their joyful playing, swimming, and running are telling us how important it is to protect and maintain the environment. I do not believe that environment and recreation are adversarial. I think consequently that the DEIS is gravely mistaken in its' proposals. I fully support a modified Alternative A (the "No Action alternative.

Correspondence ID: 3647 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Please help imperiled wildlife by not allowing anything to disturb their

nesting and living habits. I have lived in San Francisco for 35 years and have always hiked all around the GGNRA on both sides of the bridge. It is one of the most extraordinarily beautiful places I have ever seen. Part of what makes it beautiful to me is the bird life. There are so many habitats that have been taken over for human use, there is less and less available for birds. Dog owners can take their dog to the beach ON A LEASH, and still enjoy the beach without disturbing others. Perhaps a small section could be dedicated to those who want to let their dogs run free, as long as it doesn't disturb the wildlife.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for your consideration

Correspondence ID: 3648 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

In addition, as a nurse. I see the benefits of exercise in our elderly population. The majority of which walk because they have dogs. Many of

these people would not be out there if it wasn't for their pets.

Sincerely,

Michelle Isonio Redwood City, CA 94061

Correspondence ID: 3649 **Project:** 11759 **Document:** 38106

Received: May,27,2011 20:39:08

Correspondence Type: Web Form

Correspondence: The proposal is difficult to access and even more difficult to understand:

It is difficult to find the proposal on your website, and once found, it is difficult to understand because it is written in legalese. If you are honestly interested in finding out how the community feels about the proposal, the first step should be to communicate it in English.

The proposal represents an existential threat to most Bay Area dogs:

As near as we can tell, the proposal can be boiled down to "walking your dog off leash will be banned on most Bay Area beaches". For retrievers (and therefore for most dogs) this represents an existential threat, since it effectively outlaws their primary reason for being, which is to play fetch. Euthanasia may be the only humane option for these dogs, but that is not mentioned in the proposal. That the proposal fails to recognize this impact on dogs is shocking and outrageous.

The proposal substantially reduces the quality of life for dog owners:

Dog owners are being asked to surrender their enjoyment of most public beaches. Nowhere in the proposal is this cost accounted for or even mentioned. Dog owners vote and pay taxes, apparently to put people in office who then turn around and appoint bureaucrats who spend our tax money to deny us access to our own land? Wars have been fought over lesser grievances. It has been said that evil is often banal. This proposal proves it.

The proposal fails our children:

Children need to learn that we share this planet with relatives who may have fins, feathers, or fur. Playing fetch with a dog is one of the most common child/animal interactions, and banning this activity on most Bay Area beaches fails our children.

The proposal fails our senior citizens:

Many older owners, including ourselves depend on dog walking for exercise. This activity is important to our mental and physical health, and the proposal bans it on most Bay Area beaches. Again, the proposal does not seem to consider this factor at all. Were the authors of the proposal selected on the basis of being uncaring and ignorant? It would appear so.

The proposal fails our community:

The proposal unnecessarily creates deep divisions in our community. It has already spawned tremendous anxiety among dog owners, and gratuitously created deep seated animosity towards the National Park Service in particular, and environmental causes in general, that will be difficult to reverse. The proposal fails to recognize that most dog owners value their dogs more highly than their fellow human beings, and, as the callousness of the proposal proves, for good reason.

The proposal violates the terms on which the NPS originally took over management of GGNRA:

The NPS was charged with running the GGNRA as a recreation area, not as a national park. At the time that deal was made, dog walking was explicitly on the list of recreational activities the GGNRA was designed to accommodate. Dog owners would never in a million years have supported that original deal if they knew the NPS was even remotely capable of going back on it by producing a proposal such as the one before us today. We expect that this bait and switch maneuver will be litigated all the way to the supreme court if necessary, regardless of the financial cost, which brings us to our final point:

The proposal wastes taxpayer dollars:

The cost of the study and the cost of defending against guaranteed lawsuits from dog owners, including ourselves, are projected to reach into the millions of dollars. These dollars come from taxpayers, many of whom are struggling to survive financially. This money will never be seen again. It is a dead loss to our society. There is no multiplier effect from studies and lawsuits, that money provides a temporary stimulus to bureaucrats and lawyers and then it is gone forever, with zero benefit to society or to the ecosystems which we are all agree we want to protect. Every dollar spent on this madness is a dollar less spent on protecting the environment. Thanks NPS!

Conclusion:

Based on the above, we feel strongly that this disgraceful proposal should be either withdrawn or completely rewritten (in English this time) to take the above points into account and to expand off leash access at Bay Area beaches. As it stands now it is fatally flawed in all of the ways described above, and we are shocked and outraged that as taxpayers we have participated in funding a work product this shoddy, incomplete, biased, and frankly, witless. To salvage what little credibility the NPS has left we also suggest the personnel responsible for this fiasco be fired and an apology made to the taxpayers.

Correspondence ID: 3650 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: Being able to take my 2 dogs off leash to Baker Beach, Crissy Field, and Fort Funston is one of the best things about living in San Francisco. I can't imagine enjoying these location without my dogs. Dogs enhance our lives in so

many ways and they deserve a space to run. Walking on leash is just not the same. If these areas are taken away from us, the parks within the city are going to be overcrowded and unenjoyable for dog owners and non-dog owners alike. Please don't take these areas away from us!

Sincerely, Sarah Zemunski San Francisco, CA 94109

Correspondence ID: 3651 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: We must protect and harbor wildlife and these gifts of nature for the world and for our country

Correspondence ID: 3652 **Project:** 11759 **Document:** 38106
Received: May,27,2011 20:54:55
Correspondence Type: Web Form
Correspondence: I drive to the city on a regular basis to walk with my dog at East Chrissy Field beach. Please don't take this away or the other dog friendly venues. There are countless numbers of venues that are not dog friendly that families and individuals who do not wish to share their space with dogs having fun to frequent. I do believe is responsible dog ownership, so dog owners need to take responsibility for keeping the parks clean and not disturbing the wildlife or vegetation. That said, there are many humans without dogs, who are irresponsible with regard to keeping parks clean, safe and respecting the wildlife and vegetation.

Where would you have dogs go? These open spaces are far safer than small overcrowded "dog parks" that are can be measured in square feet. Dogs are a large part of our society. It is our responsibility to provide safe open spaces for them to exercise and play.

Furthermore, for destination dog friendly venues, most people also spend money in that community. So the potential for lost revenue to local business is real.

Come out to one of these beautiful parks and watch the dogs. You will find yourself forgetting your stresses and instead smiling and feeling better just witnessing their joy. There are countless studies demonstrating the health benefits of dogs in our lives.

Thank you for your consideration.

Correspondence ID: 3653 **Project:** 11759 **Document:** 38106

Received: May,27,2011 21:13:00

Correspondence Type: Web Form

Correspondence: I am a professional dog walker in Mill Valley, CA. I often use several of the trails that are under review for changes in dog walking. I have to say that I am daily befuddled at the thought of what I do becoming illegal. It's difficult to imagine walking with dogs in Nature as the unholy thing it seems to be being made out to be. When the dogs and I are out there on the trails, exercising, socializing, and doing doggy business, it is the most natural and wonderful thing I can think of.

Being a professional, I take great pride in the manners that I require of the dogs in my packs, NOT allowing them to pile out of the truck, but leashing each and every one until we are well onto the trail, and then releasing only those who are trustworthy and well trained enough to be polite trail users. I pull them over when I see other folks coming along, (runners, mt bikers, mommies with strollers or tots in tow, anyone walking with walking sticks or canes, the occasional park service vehicles, etc), and strive to never, ever be a problem for other trail users. It is my goal, and that of other professionals I know, to inspire the public to love our dogs as much as we do. Knowing that this is not always going to be the case, I avoid, avoid, avoid whenever possible, and bait my ever hungry canine companions towards me with treats, if necessary, to ensure that their attention in on ME, and not anyone else passing by. We've received many compliments over the years about how it can be done WELL.

I provide a very valuable service to my community, and plead with you to not take away the privilege of hiking these precious family pets in Natural places where they can romp and play and spin out their beans so that they can stay happy, healthy and fit, which makes them better citizens all around.

As a private individual with three of my own dogs, my heart wrenches at the thought of never being able to go to Muir Beach again. I've lived in Marin for 25 years BECAUSE of the Natural beauty of this place. The restrictions coming down feel as though we are being choked right out of the county.

As far as degradation of the parks via feces and off trail galavanting, there will always be individuals who scoff at their responsibility, but they are the minority. And I would bet that no matter what restrictions come to pass that those same individuals will continue to violate the laws. The VAST majority of us LOVE our parks, and show it by cleaning up after our precious pets, as we do not like to step in poo anymore than anyone else. In fact, my own personal and professional policy is to pick it up if I see it, whether it came

from the dogs in my care, or not.

If this precious privilege is taken away, not only will my own dogs and I suffer for it, but my business, as well. As someone who runs a legitimate business and pays taxes, I would hope to continue to do so. It is hard enough being a single person living in Marin, paying Marin rent, buying Marin gas, food, etc, without having to move out of the county to rebuild my business elsewhere, or simply close up shop. Basically, I'm begging here. Please, please don't take away this thing we love so much.

Thanks.

Megan

Correspondence ID: 3654 **Project:** 11759 **Document:** 38106
Received: May,27,2011 21:32:48
Correspondence Type: Web Form
Correspondence: And who was John Muir without Stickeen?

I exercise a pit bull/lab mix female who is two years old. I started taking Bear out when she was seven months old - the couple who owned her were both suddenly diagnosed with illnesses that prevented them from training and socializing this incredibly sweet natured animal. As I started taking her out in the world a lot of people would try and avoid me and immediately shielded their children. I came to understand that the dog's demeanor did not make a difference, people's bias took over immediately. They were frightened and as they guarded their children, their children became fearful. Bear is now under voice control, loves to play, and rejoices in the outdoors, running, rolling, playing fetch, and hide and seek with me in bushes and trees. And I rejoice in her play, and in her athleticism, she has saved me as I have saved her, totally equal in our devotion.

After I saw the notice that GGNRA was reviewing its dog-leash policy I thought I would talk to others to see what their feelings were. I choose two friends who do not own any pets. Their immediate response was negative, dogs should be on a leash. When asking why, one responded that her next door neighbor's dog was out on their property and barked at her, and this is from a distance as she lives in Sebastopol on larger acreage property. I asked her if she called to the dog, or if she said "stop" or "it's all right," or anything. She said no, it just frightened her. The other friend said a dog had knocked down her 3 year old grand child in a park. I asked if the dog was barking or aggressive. She said no, the dog looked to be playing.

I know our population has increased, and I know tourism and the use of the

parks under the control of the GGNRA has dramatically increased. I also feel that ordinary attitudes that my generation was raised with have also dramatically changed. I was raised with dogs with the attitude that they were man's best friend. As a kid growing up on Long Island, we loved our neighbor's and friend's dogs. They were by our very side - they came everywhere with us - did they knock us down, oh, yes. Did we tumble and roll with them on the lawns, oh yes. Did we run and play, take them in our boats, on rides to the beach, swam with them in the ocean, oh yes. We exhaled in the freedom of being kids with dogs, our dearest friends, confidants, the only one we could cry with - our loyal buddies.

I don't know how we have become so biased, opinionated, righteous in our demands, and so outraged to feel that we not only have to restrict where animals go and how they go, but that animal care-takers too should have the joy taken from them, the joy that comes from raising a dog as a family member that gets to live to its potential, that watches over the family, that cries when we cry, that springs to joy when we are happy.

Perhaps there are other methods besides reducing what little pleasure owner and dog now have. I think it rationale to assume that when people are afraid of a dog they encounter, they react negatively, and the dogs with their keen sense of awareness intuit those fears. That can be the start of an uncomfortable situation in the making. The dog could bark, could back away as if readying itself, may appear as acutely aggressive. All our knowledge is from exposure and education. The park does much in the way of introducing the visitor to the terrain, threatened species, and natural history. I believe dogs are part of our natural history and evolution. Dogs have served mankind for many centuries as we hunted, by our sides, as farmers fending off predators. Instead of further reducing dogs freedom by policy, how can we educate those who visit our parks and beaches. We educate about the snowy plover that habitats our beaches, why not for man's best friend! Education has always played a part in national park policy - if we can post signs on how to protect the endangered species, or habitat, why not on how to meet and greet dogs. Why not encourage local elementary schools to the reading to youngsters of what purpose and value dogs are to man, which, of course, brings to mind Stickeen accompanying John Muir as he mapped the Sierra. I am sure that John Muir would not be in favor of a further reducing to a couch potato his best friend. I ask you to consider the full impact on further restricting these animals that serve us and serve our families, children, and society.

Correspondence ID: 3655 **Project:** 11759 **Document:** 38106
Received: May,27,2011 21:36:34
Correspondence Type: Web Form

Correspondence: I strongly support your proposal to only allow on leash dogs on Pacifica trails and no dogs on Sweeney Ridge. Off leash dogs chase wildlife and may bark at or threaten hikers.

Correspondence ID: 3656 **Project:** 11759 **Document:** 38106

Received: May,27,2011 21:40:40

Correspondence Type: Web Form

Correspondence: May 27, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean,

Three generations of our family have lived in San Francisco since immigrating from China in the mid-1800s. We have explored and enjoyed the many of the areas now within the GGNRA. As a retired SF Unified School District teacher, former board member of the California Institute for Biodiversity, and owner of over 5 acres of land which have been put into trust with the Bodega Land Trust, I understand how important it is to value and preserve our environment.

This letter is to address the GGNRA's proposed policy to restrict off leash dog walking at Ft. Funston. I have been enjoying the outdoors at Ft. Funston a minimum of 3 days a week for over 30 years, walking the many trails with our dogs. During this time, I have witnessed the formation of a very viable community of nature lovers and animal lovers. It is a healthy environment for us as well as our dogs; it has become the true urban recreation area that was envisioned over 30 years ago by the citizens of San Francisco. Dog walking is our recreation and we are excellent stewards of the environment!

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking at the Fort. Yes, I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas; however, I also believe other options (besides restricting dog-walking access) should be considered. It is possible to balance recreational use (including dog-walking access) with preservation. We are doing just that now.

The current DEIS does not evaluate the impact on the "human environment" at Ft. Funston. It fails to adequately address how the proposal affects "recreational" values for the citizens of San Francisco; it fails to recognize that environmental values include both recreation and nature. Indeed, in many places the DEIS treats the environment and recreation as adversarial values (i.e., that recreation only harms natural resources). Education/improved signage and physical/vegetative barriers are preferable

to restriction. It is imperative that the DEIS include such an alternative as a reasonable option.

Conventional wisdom and experience dictate that any "compliance-based" approach punishes many for the perceived transgressions of a few. In my experience as a teacher, I've always found that confrontation is not a productive means to an end and I urge you to partner with the community to develop a workable plan and not to assume an adversarial relationship.

I urge you to consider education/improved signage and physical/vegetative barriers at Ft. Funston. Keep Ft. Funston as an off-leash area. Sincerely,

Diana Owyang

CC: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives
Ken Salazar, Secretary of Interior
Jon Jarvis, National Park Service Director

Correspondence ID: 3657 **Project:** 11759 **Document:** 38106
Received: May,27,2011 21:42:21
Correspondence Type: Web Form
Correspondence: The GGNRA is a unique area. It provides a natural wild area for local urbanites to enjoy that is a refuge from the stress of civilization. It should be managed to protect and preserve the natural features including its endangered wildlife. Please consider plan D as your primary means of management. Keeping it wild is the top priority.

Correspondence ID: 3658 **Project:** 11759 **Document:** 38106
Received: May,27,2011 21:42:32
Correspondence Type: Web Form
Correspondence: The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management

plan to: 1)Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. 2)Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. 3)Exclude speculative, exaggerated, biased, or misleading statements and studies. 4)Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). 5)Enable professional dog walking and align any professional dog walking rules with county or city regulations. 6) Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I personally have been a very responsible dog owner who has enjoyed Crissy Field and Fort Funston. All dogs should have an area where they can run free. I hope that you will consider these comments. Sincerely, Dr. Veronique Lauriault

Correspondence ID: 3659 **Project:** 11759 **Document:** 38106
Received: May,27,2011 21:44:43
Correspondence Type: Web Form
Correspondence: I would prefer to have dogs banned from Mori Point, Malagra Ridge, and Sweeney Ridge altogether....no leashed or unleashed dogs. I have done extensive hiking and biking at all locations mentioned and many dog owners begin their walks with theri dogs on leash and then take the leash off when they get away from parking areas. I have seen dogs chasing birds, squirrels and other wildlife.

If all dogs are banned it is easier to regulate. There is no way that rangers and other law enforcement can make sure all dogs remain on leash. By eliminating all dogs one doesn't have to follow everyone to make sure they conform to leash law. Just keep all dogs out and don't worry about leash or no leash.

Pacifica is going to create a special dog recreation area where dog owner can run their dogs without leash.

Correspondence ID: 3660 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27th, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

I am a dog walker and I take my dogs to many of the parks in the GGNRA. But I only take one or two dogs at a time. Every dog walker that I see out there is responsible, picking up poop and taking care that their dogs are behaving. In fact, I believe that dog walkers and other animal professionals are the most caring and responsible people out there. I believe that it is random, rogue dog owners who do not train their pets and are most likely also not responsible in picking up their pet's waste or curbing their pet's possible bad behavior.

I don't believe it is the "right thing to do", putting many, many people out of work or in desperate circumstances for their livelihood. Not to mention all of the people (from all over the Bay Area, tourists, etc) and their pets who count on these areas to be open to them and their pets every day.

Why do a handful of irresponsible people have the power to ruin something wonderful many, many responsible, caring people depend on and love? There has to be a better way.

Sincerely,

Jennifer Loayza San Francisco, CA 94112

Correspondence ID: 3661 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the

park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

In regards to off-leash areas, they should be enclosed to protect park users, wildlife, and other dogs. You should also limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Correspondence ID: 3662 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from

recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Correspondence ID: 3663 **Project:** 11759 **Document:** 38106

Received: May,27,2011 22:50:42

Correspondence Type: Web Form

Correspondence: I have three small toy breed dogs. We like to visit Baker Beach often. This is the only place i feel comfortable leaving them off leash to play fetch with a ball. The problem i have experienced is the owners of larger breed dogs who are off leash. The have a need to dominate the area and the more than half the time the owners are not paying attention to their dog. They just let them roam and wander. For example, my dogs are playing nice together and what do you know a large dog will interfer and take the ball and run off or better yet just go after my smaller dog as pray. This has really annoyed me to no end as when this happens I intensely ask the owner if they are around to pull off their dog. They just look at me in shock. I give them a few not so nice words about controlling their dog. I guess my point is that it would be nice to have a park area fenced in for small toy dogs 0-30Ibs and another fenced area for larger dogs 30ibls and higher. They could be part of the park areas within each neighborhood. Other states have this sort of set up (Arizona). I do think owners should be ticketed for not picking up their dogs poop. This is also a big problem in the city neighborhoods. I also think that outsiders, those who do not live in SF, just come on by and do and take what they can. There needs to be a few more restictive rules so our neighborhoods keep clean. I hope this has provided some incite to the dog, people, and environment situation. Thank you for your time, Karen Kelly

Correspondence ID: 3664 **Project:** 11759 **Document:** 38106

Received: May,27,2011 22:53:25

Correspondence Type: Web Form

Correspondence: please keep fort funston off leash for the dog community .I would be lost without it. My dog enjoys running so much and there are not many places that can accomidate the strength of running he can do.

Correspondence ID: 3665 **Project:** 11759 **Document:** 38106

Received: May,27,2011 22:54:53

Correspondence Type: Web Form

Type:

Correspondence: Keep dogs out of GGNRA trails! I have been bitten and snapped at by dogs off their leash many times at Mori Point, and I'm just plain tired of it. Not to mention stepping in the dog poop, and seeing the wildlife scared away by dogs charging into the bushes. Yes, I'm tired of it. No dogs at all. I would support a leash-only rule, but dog owners completely ignore such rules where we have them now (e.g., Linda Mar beach). Dog owners should have their own dog parks, where they can play dodge the doo-doo and hope that dog charging at you is friendly. Josh Gordon

Correspondence ID: 3666 **Project:** 11759 **Document:** 38106

ID:

Received: May,27,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: May 27, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean,

My name is Susan Nightingale. I am a business owner of 31 years employing over 100 people. I also am a dog owner/lover. I have had 4 dogs at one time in recent years and it has been our refuge and joy to walk at Fort Funston. We drive to Fort Funston on a weekly basis because it is so important to us all to be in nature and walk freely with out a leash. All my dogs are well behaved to both other dogs and people. They all come when called and have always been good citizens. The exercise they get from off leash walks is essential to their well being and mine.

I have taken my beloved dog friends to Fort Funston on a regular basis for over 20 years. I want to assure you that I have never seen any dog disturb wild life there. They run and play. It is important to me to respect this beautiful spot and I always pick up after them. I support the NRDC, the LVC, the Nature Conservancy, Canopy for Trees in Palo Alto, POST, Committee for Green Foothills and numerous other environmental and conservation organizations. I am fully aware of how precious our parks and open spaces are and I am committed to doing whatever I can to help. My love of dogs and walking in nature does not mean that I do not respect nature. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options

(besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Susan Nightingale Portola Valley, Ca. 94028

Correspondence ID: 3667 **Project:** 11759 **Document:** 38106
Received: May,27,2011 23:11:13
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco CA 94123-0022

Dear Superintendent Dean,

I am writing to respectfully request that the proposal to limit off-leash dog areas in the GGNRA be abandoned and that the alternative proposal be rejected as well. Both the original proposal and the alternative are too restrictive for the large number of people and dogs who live in San Francisco and use these urban recreation areas. The impacts of off-leash dog walking as stated in the EIS are not supported by facts. In addition, the EIS does not consider the negative impacts of its alternative proposal for dog walking in the Bay Area.

I have lived in San Francisco for over 30 years and have had dogs for most of that time. I frequent Ft. Funston regularly with my dog (off-leash and under voice command). We both enjoy walking there. It's a great

opportunity for both of us to get exercise, socialize and alleviate the stress of living in an urban area. If Ft. Funston were not available to us, I would visit a city park which I expect most other dog owners would do as well. Restricting GGNRA use and the resulting overcrowding of city parks will have a negative impact on the dogs, on people, on the environment and on city services that have to deal with resulting problems.

Ft. Funston has a long history of being a treasured open space that all people of the Bay Area can enjoy. It is a beautiful location used by hikers, hang gliders, horseback riders and dog walkers. We all love it there. Visitors to Ft. Funston all get along, do their own thing, and enjoy themselves. In all my years of going there, I have never witnessed fights between dogs or people, nor have I seen any of the problems that are alleged in the EIS. I have never witnessed dogs destroying the landscape, chasing birds or doing anything other than romping and enjoying the fresh air.

There is an argument that the ecosystem of Ft. Funston has been negatively impacted by off-leash dog walking. That is just not correct. For example, a UC Berkeley Environmental Sciences study presented by Megan Warren on May 7, 2007 concludes that within the GGNRA, the feeding of the Western Snowy Plover does not appear to be negatively affected by human and pet recreation.

Any environmental impact study on the GGNRA would have to include the impact of all of the groups who visit the area, not just the dogs. One could argue that one way to restore the original ecosystem of Ft. Funston would be to prohibit any trespassing by humans or animals, tear up the parking lots and keep everyone out. However, the GGNRA was created for recreational use.

Of course, the natural environment and beauty of the GGNRA should be protected ? that is the expectation of all of us who visit it so often. But the GGNRA is not a wilderness area. I am an environmentalist and would not support a position that would endanger the environment.

These are hard economic times for people. One outlet for free recreation is to go to Ft. Funston with our dogs off-leash. Do you really want to take away such a fundamentally positive thing that so many San Franciscans enjoy ? something that contributes to people's wellbeing? None of this makes any sense to the people of San Francisco.

Please keep the GGNRA policy unchanged and reject any alternative plan. Let it remain open to off-leash dog walking and to the people of this area to enjoy.

Thank you.

Sincerely,

Patricia Veitch

Correspondence ID: 3668 **Project:** 11759 **Document:** 38106

Received: May,27,2011 23:29:52

Correspondence Type: Web Form

Correspondence: To Whom It May Concern,

I was surprised and saddened to hear that you are considering limiting access to dogs in Muir Beach and that one of your proposals would completely prohibit dogs anywhere but in the parking lot. I have lived in Muir Beach for 11 years and have an 8 year old black labrador. I have cherished being able to walk from my home down to the Beach and up the Coastal Trail with my dog. It is one of my favorite parts of living in Muir Beach.

I urge you to consider an option that allows for dogs on Muir Beach and on the Coastal Trail. Muir Beach is one of the few Marin beaches where dogs can run free together and it is a big part of the Recreational (thinking of the R in GGNRA) element of this place. If people are seeking a non-dog beach, they could drive just 15 minutes up the road to Stinson.

In addition, I urge you to consider allowing dogs on leash on the trail from the Pelican Inn to the Green Gulch Gate. Green Gulch does allow dogs on leash on their property, but without being about to use the road from the Pelican Inn to the Green Gulch Gate, there is no way to get there without getting in a car. If allowed, this would preserve one good dog walk residents of Muir Beach could take.

I also encourage you to increase signage (including fees for violation) in order to help clarify regulations and encourage responsible dog ownership.

Please keep Muir Beach Dog Friendly!

Sincerely, Mary Daniel Hobson

Correspondence ID: 3669 **Project:** 11759 **Document:** 38106

Received: May,28,2011 00:16:30

Correspondence Type: Web Form

Correspondence: I am not a dog owner but I oppose the proposed restrictive Alternatives in the DEIS. I visit Fort Funston on a weekly basis and love interacting with other people's dogs. I particularly appreciate that we have a place where dogs and people can have freedom near an urban environment. The offleash options there are critical as an last-remaining option for well-behaved dogs that are under voice control. I have never had a negative experience at Fort Funston and would be seriously disappointed if the land access to dogs was restricted as proposed.

Correspondence ID: 3670 **Project:** 11759 **Document:** 38106

Received: May,28,2011 01:01:57

Correspondence Type: Web Form

Correspondence: This letter is in response to the GGNRA Draft Dog Management Plan.

You are the National Park Service. How is NPS serving the people?

Just because National Park Service (NPS) acquired more land doesn't mean you have to change it.

My biggest argument is that NPS doesn't have a good enough reason to change anything. Where dogs are allowed now, they should be allowed always.

These lands have been open to dogs for decades. NPS owes something to the people and dog owners who are and have always been the Parks' biggest customers.

How do you serve the people?

The people who go to the parks regularly are the ones who value it most. NPS doesn't understand how much dog owners truly appreciate the Parks. There's nothing NPS can possibly do that will make it all right for your most appreciative customers if you take any of the land and make it off-limits to dogs.

How does this serve the people?

NPS does not exist to expand on an agenda of banishing dogs. NPS tries to disguise this by claiming it's good for the environment, yet your real agenda isn't environment or wildlife based-you call it "Dog Management". NPS is discriminating against dog owners by even calling it "Dog Management".

Don't you see?

We're not talking about allowing dogs where they haven't been allowed before. These are places where dogs have been allowed for a long time. The wildlife is doing just fine with Park visitors who bring their dogs along. We see all kinds of wildlife at Fort Funston everyday. There's ravens, hawks and even an owl on occasion. If dogs were a problem for the wildlife, then the wildlife wouldn't be there, it would have left a long time ago.

People have a tendency to think that animals in the wild need our protection. But we become arrogant when we imagine more common wildlife will not survive without our interference, so we over-protect for the sake of Policy. Some endeavors that ring of good intentions were ultimately born of pride. Don't misunderstand-I'm not talking about endangered, predatory cats in Africa. I'm talking about hawks and ravens in abundance in our own backyards.

The wildlife in these Parks is thriving on its own without interference-even though there are lots of dogs around. In addition, it's impossible for dogs to disturb cliff dwelling birds. So how can NPS say that the dogs are disturbing the wildlife?

Yet NPS claims that dogs cause erosion as well. Nevertheless, the imperceptible erosion caused by dogs cannot compare to the erosion caused by the wind most every day along the coast. The weather and winter storms cause more erosion than the dogs can possibly do. The wind literally extends beaches across The Great Highway, forcing the closure of the highway a few times a year.

Also, let's not forget that much of the coastal land's instability makes it useless for development or other purposes-that's why Fort Funston is still a Park, and houses occasionally tumble down into the sea while others await the same fate. When the houses fall, do we blame the dogs?

So really, what do you have against dogs?

Fort Funston in particular is used by hundreds or maybe a thousand people, mostly with dogs every day. When the wildlife is thriving and the erosion is imperceptible with dogs, then what reason does NPS have to kick the dogs out?

I'd almost be willing to bet that some high official at NPS together with some NPS Representatives-like those at the public Meetings-had a bad experience with a dog, so he or she just doesn't like dogs, and goes on to make Policy to remove all dogs from all Parks. Because one dog did something, or its owner didn't have control of it, then all dogs and all dog owners are evil.

I had a couple of bad experiences with dogs myself, but by being around dogs, I gradually got over it, and now I'm a happy dog owner, and I wouldn't have it any other way. No matter who you are and whether you like dogs or not, you have to admit that owning a dog is part of an American dream for lots of Americans-we can't all be wrong-and this dream includes taking our dogs to the Parks and Beaches.

I've been to NPS public comment meetings. It feels like NPS is just paying lip service to dog owners by eliciting our comments. It sounds like NPS will do whatever it wants, and when we try to state our position, the reply is we're being "unreasonable." If we don't want to concede, we are unreasonable. How is not wanting to change it unreasonable?

We're not trying to develop it, change it, or make it into something it isn't - that's what NPS would like to do. The land is not just Parks, it's also part of the Golden Gate Recreation Area. Dog owners and Parks are not in conflict about opening to dogs a pristine land that never saw a human footprint. The land has already been set aside for Recreational use, and dogs are a part of that use, as much as running, hang-gliding, exercising, school sports-team training, and just plain walking.

Leaving Parks the way they are is a very good idea that doesn't cost extra work or money for anyone.

At his point, I could go into numerous reasons how taking the dog to the Park benefits dogs, dog owners and society as a whole. But, I don't want this to distract from the main point I'm trying to make-that NPS doesn't have a good enough reason to change anything. Thriving wildlife and virtually no erosion caused by dogs proves this argument. After these points, NPS has no legitimate argument.

Correspondence ID: 3671 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/28/11

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: I love walking my dog no one should be allowed to restrict where I go. We walk on Linda Mar Beach trails all the time. I am a responsible dog owner

who picks up after my dog. So what could I possibly be doing that would impact the environment anymore than walking by myself?

Cindy Fuentes Pacifica CA 94044

Correspondence ID: 3672 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I had the chance yesterday to visit both Crissy Field and Baker Beach. My dogs had a wonderful time at both places because they were allowed to "just be dogs;" to run, swim, and interact with other canines while not feeling like they had to defend themselves because they were leashed and unable to get away if need be from something that scared them. Please keep these wonderful areas accessible and off-leash for our invaluable canine friends and partners!

Correspondence ID: 3673 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 26, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean,

My husband and I have been residents of San Mateo County for almost 40 years. We live in Burlingame and own property in both Pacifica and El Granada. We are concerned about the elimination of opportunities for dog owners to use open areas for recreation. We do understand some areas are more sensitive than others and must be protected. What we don't understand is the logic of making all these areas off limits for people to enjoy with their dogs even if they are on leash.

It is hard for individuals to care about open space if they are restricted from developing a connection with it. If one can't read, one would not care about a library. I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the

GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for on-leash dog walking in most areas as well as off leash walking in some more sensitive areas that have been acquired by the GGNRA since 1979, especially in San Mateo County. ? Examine carefully what may be speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely, Chris and Michael Read Burlingame, CA 94010

Correspondence ID: 3674 **Project:** 11759 **Document:** 38106
Received: May,28,2011 08:20:17
Correspondence Type: Web Form
Correspondence: May 28, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean:

Thank you for the opportunity to comment on the GGNRA draft dog management plan. I live in Oakland, California and have lived in the Bay Area since 2002. I used to live in San Francisco. I meet friends from San Francisco every Sunday at Fort Funston (and occasionally Chrissy Field) with our dogs. I have a 12 year old lab mix and we both enjoy visiting Fort Funston. I sometimes bring friends to Fort Funston with me, even those who don't have dogs. I've been a member of the Sierra Club, and contributed to the NRDC and other environmental organizations. I am an environmentalist, and have spent my career working on environmental issues.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979

Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. I believe off-leash recreation is extremely important for dogs. Not only does it reduce problems between dogs, but it also helps foster happy, well-adjusted dogs, who don't cause problems with people. Living in an area of Oakland with very limited access to off-leash recreation, I see the difference between dogs where I live now, and dogs where i used to live in San Francisco. They aren't socialized as well. Dogs need to spend time off-leash, recreating with other dogs.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely, Janet Magnuson Oakland, CA 94610

Correspondence ID: 3675 **Project:** 11759 **Document:** 38106
Received: May,28,2011 08:38:57

Correspondence Web Form

Type:

Correspondence: I am writing because I was injured in a public park by dogs. I was knocked over while walking in a park by two large dogs who were chasing each other off leash. This park was marked as "dogs on lease". Because they clipped me from behind I broke my knee. My doctor said this is a common break from dogs who like to hurd. The healing required no weight bearing on that knee for 8 weeks. This had a huge consequence to my life economically as I could not work. I did not hear the dogs coming or I would have tried to avoid them. I totally approve of these new regulations and hope you will approve them and in-force them. Annie Boddum

Correspondence ID: 3676 **Project:** 11759 **Document:** 38106

Received:

May,28,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: These places mean alot to dog owners/walkers/dogs themselves. What kind of life is it to b tied-up all the time? The vast majority of dogs do no harm and even those that chase a bird are only on one small section of a huge California coast. Stop over regulating everything SF city!! Please

Correspondence ID: 3677 **Project:** 11759 **Document:** 38106

Received:

May,28,2011 08:58:18

Correspondence Web Form

Type:

Correspondence: We need MORE areas opened for off leash dogs, not less. This reduction will adversely impact dogs and dog owners throughout the Bay Area and put more stress on the limited areas remaining available. It is NOT a good decision for these wonderful publicly owned lands.

Correspondence ID: 3678 **Project:** 11759 **Document:** 38106

Received:

May,28,2011 09:02:43

Correspondence Web Form

Type:

Correspondence: I am a longtime member of the Sierra Club, and I am appalled at the discriminatory bias that the National Park Service has against man's best friend.

I love the outdoors and I'm a committed environmentalist. I also love my dog, and my favorite pastime is exploring our natural world with him. We treat the resources with utmost respect. I do not at all appreciate this document which attempts to paint my dog as some type of villain. I live in Florida but visit California with my dog. You can be assured that if these

restrictions are put into place, the San Francisco area will no longer receive my tourist dollars.

40% of American families include a family dog. It has been scientifically proven that owning a dog improves our health and longevity, but only if we can provide the right amount of outdoor exercise and stimulus for them.

The GGNRA has already restricted dog owners to less than 1% of its space. It should be INCREASING the space available for this 40% of the population, not decreasing it. Walking with and enjoying the outdoors with our dogs is a timeless human recreational activity; one of the simplest, most basic forms of recreation since the human and canine species formed their special bond 10,000 years ago.

A friend of mine immigrated to America from Norway and he is flabbergasted at the puritanical attitude about dogs in the outdoors of the United States. He loves many of the freedoms America offers him, but doesn't understand why in Norway, dogs are an accepted part of public life, and are welcomed almost everywhere, but in America, the land of the "free", this basic need is taken away from our citizens.

Please scrap or rewrite this document to increase dog walking on this public land (purchased with my tax dollars), instead of further restricting it.

Correspondence ID: 3679 **Project:** 11759 **Document:** 38106
Received: May,28,2011 09:10:47
Correspondence Type: Web Form
Correspondence: Frank Dean, Superintendent GGNRA Building 201 Fort Mason San Francisco, CA 94103-0022

May 28, 2011

I support formalization of the 1979 Pet Policy allowing Dog Walking at Fort Funston without any further territorial restriction.

Re: Executive Summary, DEIS Dog Management Draft Plan, Fort Funston, pp. xx-xxi

"Impacts to San Francisco lessingia would be long term, minor, and adverse for alternatives C, D, and E, and the preferred alternative, negligible for alternative B, and long term, moderate and adverse under the no action alternative" (p. xxi)

On the NPS.gov homepage of the Presidio of San Francisco, the article on

the San Francisco Lessingia (*Lessingia germanorum*) the article states:

"Range in State: San Francisco Bay Area. The only population known of outside the Presidio is located in Daly City. The Presidio is the type locality for this species."

Please provide substantive documentation including biology reports that San Francisco Lessingia (*Lessingia germanorum*) existed at Fort Funston as a native species prior to the adoption of the 1979 GGNRA Pet Policy, and that this native plant has degraded or disappeared as a direct result of dog walking.

I question the accuracy of all of the DEIS Executive Summary related to Fort Funston on pp. xx and xxi.

I am not a dog owner, but enjoy walking at Fort Funston and enjoy the dogs. Current policy seems fine to me, although a daily foot patrol by a Park Ranger might be good for friendly public relations and the Rangers' cardiovascular health. Licensing of dog walkers might also be explored.

I support formalization of the 1979 Pet Policy allowing Dog Walking at Fort Funston without any further territorial restriction.

Sincerely,

William Klingelhoffer San Francisco, CA 94122

Correspondence ID: 3680 **Project:** 11759 **Document:** 38106

Received: May,28,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I can't believe San Francisco would seriously consider reducing park areas for dogs and their owners. It's a main reason that we continue to pay SO much to live in the city. The cost of housing and living is driving people out of San Francisco and this will only make it worse.

My wife and I walk our terrier Cecil every weekend at Ocean Beach, Fort Funston, Stern Grove and Glen Canyon. Dogs get owners out enjoying the parks and meeting other people. Taking away that right would create an out-roar like the city hasn't seen seen civil and gay rights.

Please do the right thing and overturn these planned changes. Thanks for listening!

Correspondence 3681 **Project:** 11759 **Document:** 38106

ID:**Received:** May,28,2011 00:00:00**Correspondence** Web Form**Type:****Correspondence:** May 28, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is a flawed plan not based in fact; but instead relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the law or science. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: 1. Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. 2. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979. 3. Work with the facts and exclude speculative, exaggerated, biased, or misleading statements and studies. 4. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). 5. Enable professional dog walking and align any professional dog walking rules with county or city regulations. 6. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. The GGNRA is for everyone; and if some are excluded, they have failed in their purpose. Sincerely,

Beth Wurzweiler San Francisco, CA 94121

Correspondence 3682 **Project:** 11759 **Document:** 38106**ID:****Received:** May,28,2011 09:36:36**Correspondence** Web Form**Type:****Correspondence:** I have been a regular visitor to San Francisco and Marine County for the last few years. One of the things that has impressed me the most and that I talk

about when coming home is the dog friendliness of the parks, and the extremely good behaviour and control of the pets. I have never seen a dog fight. Even without a dog, I have enjoyed walking through breathtaking parks and greeting dogs and owners. I have read your proposal and noticed that none of the preferred alternatives include Option E, where dogs would keep the freedom they enjoy now. This would in a sense discriminate against a large chunk of the population who owns a dog, enjoys dogs but has no possibility to own one, or cannot afford to buy a car to drive to a place where the dog can run free. I can understand limiting the amount of dogs one person can bring, and I can understand the need to balance the different interests. But in your solutions the balance has tipped too much to one side.

I urge you to work harder to rectify the balance and to make sure that off-leash areas are better distributed and more accessible. That said, I have a special interest in park conservancy, and have volunteered several times, but this is not a contradiction. I still think that a better compromise can be reached.

Thank you very much.

Correspondence ID: 3683 **Project:** 11759 **Document:** 38106
Received: May,28,2011 09:37:11
Correspondence Type: Web Form
Correspondence: Protect visitors and park workers! Require all dogs to be on leash within all areas of the GGNRA, and ban professional dog walkers.

Correspondence ID: 3684 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 29, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am a dog owner. I live in Potrero Hill in SF. I frequently use the GGNRA. I like to take my dogs to natural areas. I belong to the Sierra Club and support environmental causes.

Chronologically I am a senior and off-leash dogs do not bother me. I have a

dog that needs to run off-leash to get exercise.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Joan Rosen San Francisco, CA 94107

ID:**Received:** May,28,2011 10:12:40**Correspondence** Web Form**Type:****Correspondence:** Jennifer Harden Half Moon Bay CA 94019

Frank Dean, General Superintendent Golden Gate National Recreation Area,
Building 201 Fort Mason San Francisco, CA 94123-0022 *****MAP
TO BE SENT SEPARATELY ENTITLED "CLIPPER RIDGE DOG
TRAILS" VIA EMAIL TO <goga_gmp@nps.gov>,
<GOGA_Planning@nps.gov>, *****

Regarding the Dog plan for new lands aquired by GGNRA and specifically
Rancho Corral.

I live in the neighborhood along Coral Reef that we call "Clipper Ridge" and
with my husband and family have lived here for 27 years during which time
we walked dogs off leash, rode horses, and enjoyed the trails and vistas
immensely.

I ADAMANDLY OPPOSE YOUR STATED PREFERED
ALTNERNATIVE TO THE " Dog Plan " (DEIS) AND SUPPORT THE
BASIC PREMISE THAT ALLOWS DOGS ON LEASH THROUGHOUT
THE GGNRA AND DOGS OFF LEASH UNDER VOICE CONTROL IN
SMART PLACES. Dog walking is popular in this area both on- and off-
leash and the dog policy that welcomes on-leash dog walking is a good
place to start for GGNRA. The draft management plan should be revised to
include specific areas for on- and off=leash. Moreover, current plans are too
restrictive and should be completely revamped to reflect the evolving
attitudes toward our land appreciation ? there is a growing population of dog
walkers who will enjoy and embrace public lands if they become available
for dog walking. For most parts of Rancho , on-leash walking is appropriate.
Historically, the trails close to homes and specifically to Clipper Ridge
should accommodate off-leash walking (please see map attached entitled
Clipper Ridge dog trails). These are frequented by dog walkers and some
hikers, bikers and they provide access to the southern lobe (south of
Dennison Creek) of Rancho.

There are two popular loops frequented by dog walkers, one through LT
(low trails) and one up to Flat Top (penciled in red pen) ? The LT are low
trails that are seasonally flooded in 1-2 places and would benefit from
boardwalks for winter . ? Parts of C1 are very steep but have responded well
to erosion bars; eventually they should be revised to contour up to Flat Top
? C2 is somewhat steep and has responded well to erosion bars (note, most
of the soil erosion occurred before 1980 based on air photos) ? CF (central
freeway) is a gentle slope up to Flat Top; historically the disturbance to

grade the road did the most damage but sediment seems more stable now

To my knowledge there have been no complaints registered about dog walking in this neighborhood. I request that you allow dog walking on a loop to and from Flat Top (on C1,C2,CF, and LT) , as these have proven to be highly valued resources for dog walkers for the past 30 years. Moreover I request that you allow voice control-only (off leash) walking on 1 or 2 branches of the trail (confluence of C1 and LT is a good dog romping area). We are important stewards for this land and would continue to value this open space as a recreational opportunity.

On trails leading to gun club, I think on-leash would prove to be successfully frequented by many participants. Dogs have shared the trails with bikes, horses, and hikers for years and could do so for many more.

Thank you for your consideration

Jennifer Harden

Correspondence ID: 3686 **Project:** 11759 **Document:** 38106

Received: May,28,2011 10:16:54

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I was born in San Francisco and have lived here all my life. In 1973, I voted in favor of the ballot amendment that deeded Fort Funston to the National Park Service with the understanding that the Park Service would maintain these lands for recreational purposes in perpetuity. Quotes in local newspapers from the person who became the first GGNRA Superintendent and flyers promoting support for the ballot measure, as well as ballot arguments in the voter's pamphlet promised this. The proposition passed in 1973. In 1979, consensus was reached with steak holders that a very small percentage of the GGNRA would be maintained for use by off-leash dogs. This was promulgated as the 1979 Pet Policy.

My wife and I are both senior citizens and have walked our dogs at Fort Funston for many years. We have seen the Park Service gradually remove portions of the GGNRA from recreational use and severely impair our recreational opportunities in our City. You have broken the promises you made to the citizens of San Francisco.

Your current plan unilaterally removes these small pieces of land from use by off-leash dogs and sets aside an agreement reached through consensus building. As we move into the second decade of the 21st century, the city of San Francisco is planning for a substantially increased population. It is said that we are the second most densely populated city in the country, and we

are planning for increased population density. What you are doing here is poor policy which negatively affects your neighbors greatly, and you refuse to even consider the impact your proposals will have on our city. You refuse to consider the needs and desires of the majority of park users of these tiny areas. You are proposing these changes in rules for an urban recreation area, not Yosemite or Yellowstone.

Your poor performance as a neighbor is only exceeded by your arrogance. Mr. Dean, I oppose your alternatives and urge you to revert to the 1979 Pet Policy. Sincerely,

Avrum Shepard

Correspondence ID: 3687 **Project:** 11759 **Document:** 38106

Received: May,28,2011 10:23:27

Correspondence Type: Web Form

Correspondence: Dear Administrator, I am deeply dismayed to read the recent draft plan for Fort Funston. It is hard to believe that anyone who has visited Fort Funston would want to make any changes or limitations to off-leash dog walking. When I first got a dog 15 years ago, I was told that Fort Funston is "dog heaven". Every time I go there, I see this is true. Fort Funston is currently heaven for both dogs and people. It is impossible to go there without seeing happy dogs and happy people, enjoying the out-of-doors. This kind of enjoyment is not possible with leashes. It is hard for me to believe that someone would knowingly choose to remove joy from this earth, for no good reason. So I can only guess that you have never been there. I would encourage you to go to Fort Funston and walk on the trails, and see the happy dogs and people before you make a decision to ruin it. There are many parks and beaches in Californina that either do not allow any dogs, or do not allow off-leash dogs. People who want to avoid dogs have plenty of choices. But people and dogs who enjoy the off-leash experience have very few options. When I go to Fort Funston, I often see families with children, some of whom do not have dogs. Without exception, the children are enjoying the dogs, and it is obvious that for families without dogs, Fort Funston provides an opportunity to enjoy seeing and interacting with happy, loving dogs. For the number of people and dogs who enjoy Fort Funston, there are remarkably few problems. I believe this is partly due to the group of dedicated volunteers who promote a culture of both cleaning up after dogs, and being considerate of other park visitors. Dogs at Fort Funston are not aggressive, are kept under control, and are simply having fun in a natural way. Fort Funston is NOT a pristine natural environment. Before becoming a park, it was a military installation, and since then, it has been open to dogs. Birds which inhabit the cliff areas are not disturbed by the dogs. There is no valid environmental argument for keeping the dogs on-leash in any

area of the trails or beach at Fort Funston. Dogs need to run and play, and many people cannot afford huge yards. My dog trainer has told me that small fenced off-leash dog parks promote aggression in dogs, but the same is not true for Fort Funston, because there is room for the dog to run and walk, so they do not feel threatened. Please consider carefully this misguided plan. Look at the faces of the park visitors at Fort Funston, and ask yourself why you would want to make them unhappy. There is no good reason to limit off-leash dog use at Fort Funston. Thank you for your consideration.

Correspondence ID: 3688 **Project:** 11759 **Document:** 38106
Received: May,28,2011 10:30:55
Correspondence Type: Web Form
Correspondence: Ladies and Gentlemen

I am a senior citizen living in San Francisco. I walk my small dog in the affected GGNRA areas almost daily. I am a responsible owner and clean up after my pet and obey all existing rules.

The GGNRA is a multi use facility and it is my observation that the current rules are fair to all. Severely curtailing permitted current uses will only place added burdens on our already over-burdened City park facilities.

I respectfully urge that you continue the current multi-use regulations which have proven to be fair to the overwhelming numbers of users of Park facilities. To do otherwise is to unfairly penalize pet owners and the desires of our elected officials.

Thank you for this opportunity to express my opinion.

Correspondence ID: 3689 **Project:** 11759 **Document:** 38106
Received: May,28,2011 10:32:39
Correspondence Type: Web Form
Correspondence: Part 1 of 2 parts. I am also submitting the comments as one hard copy via mail.

COMMENTS ON DRAFT DOG MANAGEMENT PLAN Submitted by Charles Pfister

The following comments refer to specific page numbers/sections of the Draft Dog Management Plan.

P. 15 ? Wildlife: "Intensive dog use of an area could disrupt its use by wildlife ?.

The use of the adjective "intensive" is misleading and meaninglessly vague in this context. Dog use does not have to be intensive, in the sense of total number of dogs present, to disrupt wildlife. Unfortunately, even if most dog owners handle their charges responsibly, one or two misbehaving dogs can ruin the attempts of the responsible owners to avoid disturbance and completely clear out kilometers of an open beach of shorebirds (see section "P. 797 Wildlife / Birds"). Synergistic impacts (Smit and Visser 1993) may magnify the impacts of a small number of off-leash dogs. At Ocean Beach on a warm day when the beach is crowded with people, a few off-leash dogs may represent a severe disturbance, because few alternative resting areas may be available.

Sandpipers and plovers, types of shorebirds found along sandy beaches and some fields in GGNRA, are known to have relatively high metabolic rates compared with other bird species (Kersten and Piersma 1987) and even short-term (and what might to some casual observers seem occasional and inconsequential) disturbance of feeding and migration behavior could have potentially serious consequences.

Using formulas to estimate energy expenditure by disturbed shorebirds, a shorebird biologist estimated that a certain species of shorebird would lose 25% of its daily energy requirement during migration staging if disturbed 20 times per day (Brian Harrington, Manomet Center for Conservation Science, personal communication, 2002). Goss-Custard et al. (2006) have used models based on an intensively studied population of oystercatchers in the baie de Somme, France to estimate that if the birds are disturbed more than between 1.0 and 1.5 times per hour in good feeding conditions or 0.2 to 0.5 times per hour in poor feeding conditions a reduction in fitness would result.

P. 19 Employee, Visitor, and Dog Health and Safety

The total number of leash law violations recorded by GGNRA and reported in this section is only the tip of the iceberg of orders of magnitude more incidents that actually occurred but were not detected and so should be noted in this section. Over the years, GGNRA has taken a "monkey-no-see" approach to enforcing the leash law and protecting wildlife and visitors from harassment by dogs. The number of violations should be seen in the context of how abysmally ineffective GGNRA has been in enforcing leash laws and protecting wildlife and visitor experience.

GGNRA has not used professional management techniques to protect wildlife and visitors from off-leash dogs. Such techniques would include reviewing enforcement attempts related to outcomes and adjusting methods

to attain results; educating GGNRA law enforcement staff about how to recognize harassment of wildlife and visitors; and following up on reports by visitors concerning patterns of disturbance of wildlife and visitors by off-leash dogs. A FOIA request submitted in 2005 related to dog management did not show any evidence of professional management techniques related such as mentioned above. GGNRA also did not respond to dozens of complaints about dangerous situations for visitors related to off-leash dogs and harassment of wildlife by reviewing policies and procedures. Instead, GGNRA was more concerned with appearing to address the issue ? not with securing results. A result of such an approach is the current high rate of non-compliance concerning leash laws.

In a letter to me dated 8/9/2001 in response to my reporting chronic disturbance of shorebirds by off-leash dogs and the lack of protection provided by GGNRA, Superintendent Brian O'Neil invited me to report future incidents of wildlife harassment I observed to park dispatch. He did not offer any suggestion that GGNRA would engage in professional management techniques to address the problem.

In fact in subsequent years, I frequently jogged on Ocean Beach, and in almost every instance observed multiple incidents of harassment of birds by off-leash dogs and violations of the leash law. Approximately 20 times I reported such harassment, as suggested by O'Neil, and waited at the site of the harassment to determine the outcome of my call. In no case did GGNRA respond soon enough to intervene in the harassment I reported. In no case did my call result in a report or citation being issued documenting the harassment. Most disturbingly, GGNRA did not show any indication of taking any initiative to prevent future instances of harassment of wildlife such as I reported. Some dispatchers seemed uninformed about the current regulations or even that disturbance of wildlife was illegal in GGNRA.

Some of the specific incidents on Ocean Beach included:

? 8/21/2004

5:30 - 6:00 p.m. -- Observed large flock of approximately 500 elegant terns and off-leash dogs ? no evidence of enforcement

6:00 p.m. -- Called in about dogs. Told by dispatch that three rangers called in sick.

6:55 p.m. Saw terns flushed by two dogs off-leash. Called dispatch again. Was told two rangers had previously responded but found no indication of violations. The rangers were now at a rest stop but would respond again.

7:25 p.m. No evidence of further response.

? 3/21/2007

6:15 ? 6:25 p.m. ? Observed harassment of shorebirds by off-leash dogs and called dispatch. No response.

7:10 p.m. ? No response. Called to find out what happened. No record of explanation.

? 4/9/2007

5:15 p.m. ? Reported harassment of shorebirds by off-leash dogs. Ranger came within a few minutes but did not find harassment. Conversation with dispatcher ? he described how visitors put dogs on leash when they see rangers come and that there is a website with the location of park rangers. No mention of countermeasures. Called a second time because of continued harassment. No record of response.

? 9/21/2007

5:15 ? 6:00 p.m. ? Harassment of shorebirds: visitor throwing ball for dogs in snowy plover area of dunes; several dogs chasing birds along shoreline. No evidence of patrol.

5:44 p.m. ? Reported harassment of birds.

5:58 p.m. ? No response. Called again. Dispatch said ranger was en route.

? 11/3/2007

5:35 p.m. ? Reported golden lab chasing dogs in area Tarval to Ortega, going north. Approximately 100 shorebirds trying to feed at tide line; many off-leash dogs south of this area.

5:45 p.m. ? No response. Called again and spoke with "Vicky" the supervisor; no record of previous call. Will send someone out. No record of further response.

? 11/18/2007

11:15 a.m. -- Reported dogs chasing birds in snowy plover protection area. Dispatcher initially said that dogs off-leash were OK along the water. Gary, acting supervisor then got on the line and claimed what the dispatcher said was a "miscommunication" or "misunderstanding". He claimed that the snowy plover protection area is only the "dry" area of the beach. Excuses for

not responding: oil spill, etc, etc.

11:30 a.m. ? I left beach. No response by this time.

? 12/31/2007

11:57 a.m. ? Reported two pit bulls off-leash approaching snowy plover area; chasing birds

12:02 p.m. ? No response. Dispatched stated that ranger had responded and was on the "street side" (i.e., Great Highway) but went up to look over the beach and saw no problem. I never observed the ranger in the area of disturbance.

? 3/7/2008

5:44 p.m. ? Reported several dogs off-leash running up and down the beach. Saw German shepherd chasing birds on tide line and several other dogs off-leash dogs.

5:59 p.m. ? No response. Called dispatch, who reported that a ranger had responded but saw nothing. I never saw any ranger in the area of the disturbance.

? 3/10/2009

5:07 p.m. ? Reported off-leash dogs chasing shorebirds

5:22 p.m. -- No response. Dispatch gave excuse of drugs and stolen car call at Presidio. Sending someone from Presidio. She will assess the situation. Dispatcher was not aware that my call was in the snowy plover protection area. Dispatch was not aware that dogs chasing shorebirds was not OK outside the snowy plover protection area.

P. 28 Dogs and Wildlife: "While it is generally well known and well documented that the presence of dogs in natural areas can result in disturbance to wildlife, studies reviewed as part of this analysis provide conflicting conclusions."

"Conflicting conclusions" is a misleading characterization. There is no scientific research that contradicts the fact that off-leash dogs frequently represent an intense level of disturbance for the primary type of situation of dogs vs. birds encountered in GGNRA: off-leash dogs disturbing shorebirds and other birds on open sandy beaches. See section "795 ? Wildlife / General Wildlife."

P. 794 -- Wildlife / Impact Thresholds The discussion of adverse impacts does not make sense. If an impact is not outside the "natural range of variability," then it is by definition not detectible. The phrase "natural range of variability" needs to be defined. It is not clear to me why the authors of this section require a park-wide effect to occur for an impact to be categorized as "major." It is not necessary to endanger a regional population of a species for the impact of disturbance in a specific area of GGNRA to be major. For example, any chasing of shorebirds by dogs of more than a few times per day, such as occurs almost daily at Ocean Beach, would be potentially a major disturbance impact in that area.

It should be noted that any dog allowed by its owner to chase birds or other wildlife is a violation of 36 CFR 2.2(a)(2) which prohibits harassment of wildlife. It is true that human visitors engaged in activities such as walking, surfing, fishing, and kite flying disturb wildlife to some extent. However, in almost no case is the disturbance as serious as the disturbance caused by off-leash dogs and the human disturbance is almost never intentional, and therefore does not violate 36 CFR 2.2(a)(2). The analysis of adverse impacts as written appears to condone illegal activities under 36 CFR 2.2(a)(2) if there is no regional population impact. Harassment of shorebirds at Ocean Beach represents a particularly cruel form of harassment (see section "P. 797 Wildlife / Birds").

A more direct assessment of the impacts on wildlife in each section discussed, such according to criteria suggested by Pomeranz et al. (1988), would be more appropriate.

P. 795 ? Wildlife / General Wildlife

Studies by Bekoff and Meaney (1997) and Forrest and St. Clair (2006) were cited in the Draft as examples of studies that suggest that there is no impact of off-leash dogs on wildlife.

An examination of these studies shows that both have little to no relevance to coastal disturbance issues in GGNRA. Specifically, the bird species included in the impact studies were songbirds and the habitats involved were forests and meadows. In these environments dog walkers traveled primarily along trails and disturbance was thought to occur intermittently (Bekoff and Meaney 1997) only when off-leash dogs left the trails. This disturbance scenario represents levels of disturbance much lower than in areas in GGNRA such as Ocean Beach or Crissy Field, where off-leash dogs potentially travel throughout the entire extent of wildlife habitat and even brief observation reveals that dogs frequently chase birds. In both of these studies available evidence suggested that dogs did not frequently leave the trails, so that in neither study was there any direct evidence that disturbance of birds by off-leash dogs was actually occurring. Therefore, the negative

results of these studies may not represent any testing of the hypothesis that off-leash dogs disturb wildlife.

Addition discussion of each study:

Bekoff and Meaney (1997)

This study is primarily based on a survey of attitudes of visitors to open space areas in Boulder County, CO about dogs ? a survey that by the nature of the questions asked seems specifically intended to find support for allowing off-leash dogs in open spaces. A small part of the study consisted of alleged observation to detect any immediately observable impact on wildlife by dogs.

This part of the study is hopelessly flawed. Observations of dogs were made by an observer following dogs along a trail in various open space areas. Observations were allegedly made about the frequency of dogs disturbing wildlife: various mammals and several bird species (black-billed magpies, robins, dark-eyed juncos, mallard ducks, Steller's jays, and mountain and black-capped chickadees). The definition of disturbance of wildlife was "flushing or chasing." It was not clear whether the observers were qualified to determine whether birds were disturbed by dogs or whether accurate observations could have been made regarding all species of wildlife during the "real-time" observation relied upon to detect disturbance. It should also be noted that disturbance may not be immediately observable in terms of avoidance of dogs by wildlife (see below in this section and under "P. 1250 Special Status Species ? Western Snowy Plover / Ocean Beach"). It should be noted that songbirds are rarely susceptible to harassment or disturbance by dogs. Their habitats, behavior, and the lack of ability of dogs to stalk them make songbirds essentially invulnerable to disturbance by dogs, unless a human trains a dog to locate nests of ground nesting species.

The study authors claim that in 150 hours of observation, no observations were made of birds being disturbed by dogs. However, the bird species included in the study are unlikely to be disturbed by dogs in their natural habitat, and observations also indicated that dogs rarely left the trail for a significant distance (a result that might also suggest observer effect.) Thus, it is not clear that disturbance of birds was even an issue in the study area.

The authors never specifically define what criterion would be used to determine whether disturbance of wildlife was occurring beyond "flushing or chasing." However, in the Discussion section, the authors suggest that they were using a highly restrictive, almost legalistic definition of disturbance. They claim to have seen only two instances of "earnest chases" of wildlife, in which it was "unambiguously concluded that it was the dog who initiated and maintained the chase." With such a convolutedly

restrictive description of what was allowed to be considered disturbance of wildlife, it is no wonder that so few instances of disturbance were documented.

The authors of this study also make the incredible statement that: "All observers noted that dogs off-leash were friendlier than dogs on leash though no data were detailed data were collected on this aspect of behavior." The fact that the observers in this study would hold and even publish such a biased, unsubstantiated and subjective impression about off-leash dogs in an area of concern central to the study indicates that data regarding the disturbance of wildlife by dogs cannot be trusted nor can the authors' interpretation of the results of the study.

The conclusions of the authors regarding mammals have been superseded by a far more sophisticated study of the impact of off-leash dogs on mammals also along trails also in open space areas in Boulder County, CO (Lenth et al. 2008). This study compared various objective indicators of mammal activity along trails in open space areas in which dogs were prohibited vs. areas where dogs were supposed to be under "sight and voice control." The presence of dogs along recreational trails was correlated with altered patterns of habitat utilization by several mammalian species. This study showed how unreliable the methods and results were of the earlier study by Bekoff and Meaney (1997) and that their method of direct observation of dogs "flushing or chasing" wildlife did not detect significant disturbance impacts on mammals.

Forrest and St. Clair (2006)

Another study cited, Forrest and St. Clair (2006), compared local diversity and abundance of mammals and birds in open spaces where visitors were required to leash dogs vs. areas where dogs were allowed off-leash. Most of the visitors traveled through the open spaces via trails. The study found that "off-leash dogs have no effect on the diversity or abundance of small mammals or birds in urban parks." However, the study has little relevance to the issues at hand in GGNRA, as the study involved songbirds, not shorebirds, and the habitats in the study were generally not comparable to GGNRA, especially the open beach area used by shorebirds in GGNRA.

Even if the result of the study that off-leash dogs do not impact birds were potentially relevant to GGNRA, the authors of the study present a long discussion showing why the negative result of their study may not be valid.

? Local diversity and abundance may not be a good indicator of the impact of disturbance on a species.

? The authors indicate that evidence shows that there may have been a high

rate of non-compliance of leash laws so that "the functional differences in our leash designation treatments and, consequently, differences in our response variables?" were possibly invalid.

? The authors state that observations made in the field suggest that dogs did not stray far from trails in most habitats, so there may have been little actual disturbance of wildlife over the areas used as treatment locations in the study. Therefore in this scenario: "?dog activity is restricted to such small temporal and spatial scales that its effects are negligible."

? "A third reason that leash designation may not affect birds and small mammals ? is because these communities may already have responded to the presence of wild coyotes."

Thus the result of the study that off-leash dogs do not affect wildlife is dubious, according to the authors themselves.

Citing of these two barely relevant or irrelevant studies in a paragraph beginning with a cursory two sentences with no citations discussing the impacts on wildlife of off-leash dogs presents a bizarrely skewed account of the relevant scientific literature and probable impacts on wildlife of off-leash dogs in GGNRA. These studies are referred to in several occasions in the Draft without the shortcomings and lack of relevance being discussed.

In other sections, the Draft cites some studies that show or infer that dogs represent an especial disturbance to wildlife. Studies not cited of particular relevance to GGNRA that show impacts of dogs or identify dogs as likely factors in general human disturbance of birds in coastal environments include:

? Davidson and Rothwell (1993) ? In a summary of research on the effects of human disturbance on waterfowl and shorebirds during winter and spring and fall migration it was found that on tidal flats, moving people and animals (especially dogs) generally create worse disturbance than sedentary people.

? Kirby et al. (1993) ? At an estuarine beach in Wales, a traditionally important roost for several shorebird species, including black-bellied plover, red knot, sanderling, dunlin, and bar-tailed Godwit, dogs caused 27-72% of total disturbances observed per year.

? Keller (1991) -- At low tide, 70% of disturbances of eider ducklings were caused by dogs with or without people, while people without dogs accounted for 9%. Broods were disturbed by dogs for significantly longer periods than by walkers or anglers and at about twice the distance.

? Pfister et al. (1992) ? Disturbance at a high tide resting area at a coastal barrier beach displaced shorebirds and seemed to cause long-term declines in abundance. Most disturbance was believed to be caused by pedestrians and off-leash dogs.

? Scott (1989) -- Dog-walkers were the most frequent cause of disturbance of shorebirds at a coastal estuary.

? Smit and Visser (1993) -- A summary of Dutch research from reports not normally accessible to English-speaking scientists concludes that running dogs are very disturbing to shorebirds.

? Thomas et al. (2003) -- Human disturbance reduced the amount of time sanderlings spent foraging on two Central California beaches. The most significant factor was the presence of free running dogs on the beach.

P. 797 Wildlife / Birds

In general scientists have not frequently done specific research regarding the impact of dogs on wildlife, since the severity of the disturbance is obvious in many cases. Most of the relevant research exists under more general disturbance topics. The relevance to disturbance by dogs can be inferred from the research results and knowledge of the biology of bird species and the site characteristics in GGNRA.

The literature summary in the Draft is primarily concerned with the general issues of the disturbance dogs may cause to wildlife. The literature review should be extended to focus on specific disturbance and other conservation issues related to GGNRA. For example, dogs are often mentioned as an especially intense form of disturbance in bird disturbance studies in coastal environments (see above in section "P. 795 ? Wildlife / General Wildlife").

It is virtually impossible to quantify the overall impact of a specific factor, such as disturbance by dogs, on shorebird populations because of the enormous difficulty and expense of obtaining the necessary data. Colwell (2010, pp. 284-286) summarizes some studies of behavioral responses of shorebirds to disturbance, indicating that many of the studies focused on measuring foraging responses to disturbance. However, the full implications of ongoing chronic disturbance of shorebirds by dogs such as occurs in GGNRA must be discussed primarily in theoretical terms.

A previous study (Pfister et al. 1990) found that intermittent disturbance along a beach of similar length to Ocean Beach resulted in reductions of shorebird numbers of species using the beach for a high tide roost of up to 50% within a year and probably caused some species to abandon the beach entirely over time. In this study, however, disturbance only occurred at high

tide. Therefore, disturbance at Ocean Beach may be far worse, since shorebirds seem obligated to use the zone of maximum disturbance at the tide line for feeding (see below). It should also be pointed out that in the Pifster et al. (1990) study shorebirds had alternative roosting areas within a few miles. This does not appear to be the case at Ocean Beach.

Disturbance of shorebirds may be hard to observe at Ocean Beach, because once aggressive dogs are present, birds scatter and are not easily observed. For example, on April 8, 2000 during the peak of northbound migration of shorebirds, I walked along the beach south of Sloat Boulevard. I counted approximately 300 large shorebirds (whimbrels; willets; and godwits) intensively feeding at the edge of the surf. At this time there were no dogs on the beach. Within approximately 90 minutes many dogs were on the beach and most of the birds had been dispersed. At this later time an observer would never have known about the earlier assemblage of large shorebirds and would have not realized that such severe disturbance had occurred.

Correspondence ID: 3690 **Project:** 11759 **Document:** 38106
Received: May,28,2011 10:34:10
Correspondence Type: Web Form
Correspondence: Part 2 of 2. These comments will also be submitted in one part via US mail.

The following is a discussion of various issues related to the impact on shorebirds of off-leash dogs at Ocean Beach.

? Lack of alternative resting areas

Based on observations I have made at Ocean Beach, it has become clear to me that the vast majority of shorebirds at Ocean Beach remain on site continuously for both feeding and resting and do not "commute" to other parts of San Francisco Bay at various tidal cycles or due to disturbance. I have inferred this fact by comparing counts of shorebirds on consecutive days and by the fact that I have never seen flocks of shorebirds or individuals flushed by disturbance travel in any other direction than along the beach.

Because the shorebirds at Ocean Beach do not appear to have alternative roosting areas where they can seek refuge during periods of disturbance, they are subject to the full impact of disturbance with potentially more serious consequences (Colwell 2010, p. 281).

? Shorebirds exposed to intense disturbance while feeding at the tide line.

Shorebirds at Ocean Beach/Fort Funston generally remain along the tide line -- where most dogs are walked by their owners -- for foraging. The primary prey species of most shorebirds appears to be the sand crab, probably *Emerita analoga* (Ricketts et al. 1985; p. 252). Foraging behavior of the sand crab (Ricketts et al. 1985; pp. 252-3) seems to correlate well with the behavior of feeding shorebirds. Specifically, the crab moves up and down the beach to remain in the zone of breaking waves and emerges from sand that has become fluid by water movement in the "wash zone." Thus, the fact that shorebirds congregate at Ocean Beach at the edge of the surf (often jumping into the wash zone) is probably explained by the fact that they are tied to this area in order to forage on sand crabs.

The degree of disturbance by off-leash dogs along the tide line at Ocean Beach/Fort Funston can be catastrophic. When large numbers of shorebirds are present, inevitably off-leash dogs chase the birds up and down the beach. Some persistent dogs will continuously harass and chase flocks of birds for hundreds of meters or more up and down the beach. Given that the shorebirds are tied to the tide line in order to get their food for survival, it is hard to imagine a more cruel and brutal form of human disturbance of wildlife in nature.

? Narrow beaches increase impact of disturbance

At higher tides shorebirds are forced from preferred feeding areas around Sloat Boulevard; at many mid-tide levels shorebirds there are wedged against the cliffs of Fort Funston and are unable to avoid passing foot traffic. One off-leash or even a leashed dog would be capable of flushing birds from an entire segment of beach under these conditions.

? Areas of cover scoured by storms and sand removal

In the winter, storm surges and high tides sometimes scour the beach in the Snowy Plover area on Ocean Beach. The area where the plovers normally seek refuge among debris at the back of the beach becomes flatter and swept clean of debris. This condition also occurs after sand removal. Under these conditions, western snowy plovers, sanderlings, and other shorebirds and other bird species are exposed to more disturbance from humans and dogs due to lack of cover and protection in resting areas.

? Larger flocks targeted by dogs

Off-leash dogs appear to affect the flock structure of shorebirds. Large flocks of shorebirds are thought to be more vulnerable to disturbance (e.g., Smit and Visser 1993), and my observations over the years indicate that large flocks of shorebirds present tempting targets to off-leash dogs. I have found congregations of up to approximately 300 larger shorebirds (willets,

godwits, whimbrels) during both northbound and southbound migration on numerous occasions south of Sloat Boulevard. There have been congregations of up to 500 smaller shorebirds, primarily sanderling, further north between approximately Noriega and Taraval. In addition, this area is used in the fall by terns. In the fall of 1998 I observed approximately 1000 elegant terns in this area resting on the beach. Flock structure is believed to confer benefits to shorebirds, including increased foraging efficiency, defense from predators, and successful migration strategies (Colwell 2010, pp. 188-193). The disturbance from off-leash dogs tends to break down the flock structure and scatter shorebirds into small isolated groups.

Although I accept the general concept of the Preferred Alternatives in allowing some portions of the beach area to be used by dog walkers with off-leash dogs, these sections need to be greatly confined so that most of the beach areas do not have off-leash dogs and birds can avoid the sections of beach disturbed by off-leash dogs.

P. 802 Compliance-Based Management Strategy

The 25% compliance rate target is far too low to protect wildlife or visitors. Goss-Custard et al. (2006) have used models based on an intensively studied population of oystercatchers in the baie de Somme, France to estimate that if the birds are disturbed more than between 1.0 and 1.5 times per hour in good feeding conditions or 0.2 to 0.5 times per hour in poor feeding conditions a reduction in fitness would result. As discussed in other sections, just one or two aggressive dogs can wreak havoc in an area of shorebird concentration. Some areas of GGNRA are visited by dozens or even hundreds of dogs per hour. If 25% of these in a controlled area are still off-leash, the character of the area related to wildlife and visitor experience would still be that of an off-leash area.

A 2005 FOIA request did not show that GGNRA had any method of tracking repeat offenders regarding leash law violations or other bad behavior of their dogs. The level of contempt for the law and public safety expressed in various incident reports by dog walkers indicates that any fines for dog-related violations must be severe in order for compliance to be a realistic goal.

In preparing a final Dog Management Plan, NPS should investigate reports that in the past 15 years, GGNRA has transferred rangers who enforced the leash law when complaints about a specific ranger were received from dog walkers who were irritated with the leash law being enforced. The reasons for GGNRA's pathetic performance in protecting wildlife and visitors from off-leash dogs needs to be fully explicated so that in the future "compliance-based management" is credible.

Although I accept the idea of compliance-based management, GGNRA should not completely rely on compliance to assess and implement the DMP. Changing environmental conditions, changing wildlife populations, and changing visitor behavior could undermine various assumption in the DMP. GGNRA should continue to monitor the outcomes of its policies and be able to adjust the DMP related to factors beside the compliance rate.

P. 1250 Special Status Species ? Western Snowy Plover / Ocean Beach

A number of studies done by GGNRA regarding the western snowy plover are cited but not discussed in detail. These studies are, however, often picked apart by non-scientist off-leash dog advocates, suggesting that the studies have failed to find any evidence of disturbance of western snowy plovers by dogs.

I have previously reviewed a number of these studies as cited in the Draft.

The number of instances of disturbance and harassment of western snowy plovers reported by NPS is small because the sampling method used by NPS: 1) involved observers moving down the beach and surveying an entire segment of the beach and not watching specific flocks of plovers and 2) the sampling method did not attempt to specifically include observation periods when the level of disturbance was mostly likely to be severe, so the periods of peak disturbance, which may be very significant in assessing overall impacts, are not represented in the data.

Regarding:

? Hatch. 2007. Status Report: Western Snowy Plovers and Recent Changes in Human and Dog Use Within the Snowy Plover Management Area at Ocean Beach?."

I reviewed a draft of this report dated 5/14/07.

The use of "encounter rates" as a measure of the rate of disturbance is an attempt to use the data set for something it is just not suited for. It is not possible to justify obtaining "encounter rates" from observations made along a transect. Even assuming the observer could perfectly observe all birds and disturbance within a "sector," the study appears to overestimate the time an observer could make observations within a sector. When the observer is half way through a sector, half the sector is behind him/her and events in that portion are no longer observable. Shorebirds, including western snowy plovers, have a patchy distribution on the beach. If within a sector, a major flock is located in the beginning portion of the sector, during most of the observational period, this flock will not be visible to the observer. Thus, while the study suggests that an observer was within a western snowy plover

area for 15 hours/year (i.e., "the amount of time window in which observers can actually observe potential impacts to western snowy plovers -- p. 7"), the effective amount of time in which disturbance could actually be observed would be closer to 7.5 hours than 15 hours (given a perfect observer), if one were to accept the concept of "encounter rate." However, the actual number of hours of effective observations of plovers is probably much less, since it is hard to imagine that an observer could accurately observe all disturbances of these small, cryptically-colored birds from distance of more than 100 feet, assuming the observer had already spotted and was carefully watching a bird or flock. The actual number of hours of observation in which useful observations might have been made of western snowy plovers on Ocean Beach could be as low as 2 or 3 hours or less per year in all observations combined. Given all the factors involved in determining the behavior, distribution and abundance of snow plovers, this is a pathetically low number of observational hours from which to draw any conclusions.

The study also failed to adequately survey the beach during the relatively narrow windows of peak northbound and southbound migration of shorebirds, when critical disturbance would be likely to occur. The study failed to take into account differential behavior and distribution of western snowy plovers based on the amount of dog and pedestrian traffic on the beach (Baye 1995). For example, a few dog walkers with aggressive off-leash dogs could displace plovers from feeding on the front of the beach, yet a survey would not find any disturbance issues, since the plovers would have already been displaced, and there might be few dog vs. plover interactions during the survey.

Because of the sampling method, there is so much variation in such variables as "Dogs Per Hour Chasing Shorebirds (p. 13)" that such variables are not really useful for statistical analysis or even biological interpretation. Median or average values of disturbance rates have little usefulness in assessing disturbance at Ocean Beach. On some dates or times, there are virtually no pedestrians and dogs on the beach; at other times, there may be numerous dogs but because of previous severe disturbance, little interaction between dogs and birds. Averaging data of surveys from these cases with surveys with more intensive dog/bird interactions would tend to obscure the nature of the impact of dogs on birds.

The study found average "Dogs Per Hour Chasing Shorebirds" of between 0.14 and 1.92 (p. 11). I have sought out situations in which disturbance was likely to occur and frequently made observations suggesting rates of over 20-30 disturbance incidents per hour for shorebirds (regarding a specific flock or sector of the beach). In a one-hour observational period in 2006, I observed five disturbance incidents regarding western snowy plover roosting in a mixed flock of other shorebirds, primarily sanderlings. Apparently, in one hour I observed more instances of dogs disturbing western snowy

plovers than in the entire five years of this study (p. 11).

NPS apparently uses the correlation between the number of dogs vs. western snowy plover abundance as evidence that dogs impact plovers. Although the conclusion may be somewhat relevant, I think that the weakness of the correlation is more significant than its statistical significance. The correlation is much weaker than found in a similar correlation between a disturbance index and local abundance of various shorebird species (Pfister et al. 1992). Gill et al. (2001) discuss scenarios in which wildlife that exhibit a weak avoidance behavior towards a disturbance may actually be impacted by disturbance more than a species that exhibits strong avoidance behavior. This occurs because a species has no "suitable alternative habitat" and will be forced to remain in a highly disturbed area, regardless of whether its fitness or survival is impacted by disturbance.

"From a population viewpoint, the species most likely to be adversely affected by disturbance are those for which the fitness costs are high but they have little excess habitat to move to ? and are thus constrained to stay in disturbed areas and to suffer the costs in terms of reduced survival or reproductive success."

I believe that this is the case with western snowy plover at Ocean Beach.

NPS has focused most of its survey and research effort on western snowy plover and hardly mentions other bird species that are harassed and disturbed by dogs. A number of bird species commonly found in GGNRA are listed in the 2007 United States (Yellow) Watch List (a joint project between American Bird Conservancy and the National Audubon Society -- <http://www.abcbirds.org/abcprograms/science/watchlist/index.html>). Such a list includes species that are not yet listed as threatened or endangered but after a conservation analysis are believed to be in greatest need of immediate conservation attention to survive a convergence of environmental challenges, including habitat loss, invasive species, and global warming.

Species on the list that I have observed to be subject to harassment and disturbance by dogs include:

Elegant tern Sanderling Long-billed curlew Marbled godwit

These species and other birds harassed by dogs should have been discussed in the Draft.

P. 1401 Visitor Experience Use and Experience This section is extremely weak. Lumping all visitor who are against off-leash dogs in GGNRA as "visitors who would prefer not to have dog walking in GGNRA" does not begin to characterize the nature and variety of ways visitor experience can be

impaired by dogs and off-leash dog walking in GGRNA and trivializes the intensity to which the presence off-leash dogs may cause feelings of fear and unpleasantness to visitors.

Various subgroups of visitors have extraordinary safety concerns because of off-leash dogs, including: 1) the elderly; 2) visitors with young children; 3) horseback riders and other special users; 4) blind and disabled visitors; 5) various minority groups; and 6) visitors who suffer from fear of dogs because of previous experiences or for other reasons. For many in these groups, an off-leash dog area may represent a flat out "no go" area.

For visitors who do not necessarily have extraordinary safety concerns, the impact on their experience in visiting GGNRA due to dogs, especially off-leash dogs, can also be strong enough to displace them from off-leash areas. Many visitors enjoy the opportunities GGNRA offers to escape the urban environment and experience nature, solitude and even almost wilderness. Off-leash dogs can completely destroy the quality of this experience for many visitors.

A study of visitor experience related to dogs in open space areas in Boulder, CO (Vaske & Donnelly 2007) indicated that a significant proportion of visitors to open space areas reacted strongly to negative behavior associated with off-leash dog walking . A total of 951 visitors, both dog owners and non-dog owners, completed questionnaires regarding their attitudes towards potentially disruptive behavior by dogs. Those dog behaviors were classified as "direct" and "indirect" and were as follows:

Direct behaviors:

? Dogs jumping on a visitor (60%)

? Dogs pawing a visitor (50%)

? Dogs licking a visitor (35%)

? Dogs sniffing a visitor (23%)

? Dogs approaching uninvited (36%)

Indirect behaviors:

? Owners not picking up after their dogs (79%)

? Dogs causing wildlife to flee (57%)

? Dogs flushing birds (46%)

? Owners repeatedly calling their dogs (31%)

? Dogs off trail (18%)

? Dogs "play" chasing another dog (18%)

Respondents were asked about their attitudes towards experiencing those behaviors in open space area. The percentage for each category listed above indicates the percentage of respondents who felt the behavior was a "moderate" or "extreme" problem if it occurred during visitation.

Additional analysis of the data indicated that for 9 of the 11 behaviors visitors indicated "no tolerance" norms even for only one occurrence of the behavior. Such a result can be interpreted to mean that the given behavior is unacceptable and there is no tolerance for the behavior if encountered by visitors.

The results of the study by Vaske & Donnelly (2007) suggest that the negative behaviors many visitors associate with dogs in natural areas are not simply minor irritants but could potentially spoil the entire experience for the visitor. Such an interpretation is consistent with my own experience that many friends and acquaintances completely avoid areas of intense off-leash dog activity in GGNRA, such as Crissy Field, Fort Funston, and Ocean Beach.

A factor not discussed by NPS in the Draft is how the presence of off-leash dogs affects the carrying capacity of GGNRA. Carrying capacity is the level and type of recreation use that can be accommodated in a park without violating standards for relevant indicator variables (Manning 2007, p. 25). In terms of the indicator of visitor experience, different user groups probably have widely different tolerance levels of the presence of dogs and dogs off-leash. The stratified results of the 2002 Survey regarding such issues as attitudes towards leash laws undoubtedly reflect such differences.

A quantitative study by Arneburger et al. (2004) showed that the presence of off-leash dogs in an urban park made a remarkable difference in the degree of tolerance of visitors for crowding in the park. The presence of off-leash dogs decreased the tolerance of visitors to social conditions such as crowding. A certain degree of crowding of visitors that might be acceptable with few or no dogs off-leash became unacceptable when many visitors had dogs off-leash. Such a result is intuitively obvious at areas of GGNRA where visitors with off-leash dogs congregate, such as Crissy Field or Ft. Funston. Active off-leash dogs may seem to take up all the space between

people and create a greater sense of crowding than would otherwise occur.

Anywhere in GGNRA where large numbers of dog walkers and other visitors congregate, the potential exists for visitor tolerance of crowding to be exceeded due to synergistic impacts of off-leash dogs, social crowding, safety concerns, and many other factors. Although there are no studies specifically addressing the idea of carrying capacity in GGNRA, the results of the 2002 Survey should provide some clues as how certain user groups may view carrying capacity and be displaced from off-leash dog areas. The idea of a carrying capacity was not discussed by NPS in the Draft at all.

The fact that dog walking, especially off-leash dog walking, in GGNRA potentially excludes many user groups and a large proportion of potential visitors must be explicitly discussed and the ramifications for the mission of the NPS resolved for any alternative allowing off-leash dog walking.

P. 1402/3 -- Visitor Experience / Impact Thresholds The definition of a "major" and "moderate" impact as defined requires consideration of whether other Park areas are available to visitors if a specific area receives an impact. The definition of "major" and "moderate" should only refer to the impact within the area being considered. If off-leash dogs make an area so uncomfortable for a significant proportion of visitors that the visitors are displaced from that area, then the impact is "major" for that area.

If a significant number of visitors do not tolerate dogs in an area where off-leash dogs are present, then my view is that this is a major impact, since a significant number of visitors may be displaced from a specific area. The only way visitors could avoid feeling unsafe or uncomfortable in an area where off-leash dogs are present, would be to have enough space to completely avoid encountering off-leash dogs. This is usually not possible at some of the most popular areas in GGNRA, including Ft. Funston, Ocean Beach, and Crissy Field. It is likely that a significant proportion of potential visitors are displaced from off-leash areas (see below under "P. 1404 Visitor Experience / Visitors Who Do Not Have a Preference about Dog Walking in GGNRA").

P. 1403 -- Visitor Experience / User Groups The designation of three user groups, essential pro-dog, anti-dog, and neutral, is an arbitrary and extremely oversimplified approach to evaluating visitor experience.

P. 1404 Visitor Experience / Visitors Who Do Not Have a Preference about Dog Walking in GGNRA This section refers to the 2002 Social Research Laboratory survey results that 49% of respondents reported that off-leash dogs had no impact on their experience. The survey results actually are that 49% of respondents who had seen off-leash dogs believed that off-leash dogs had no impact on their experience. This section incorrectly assumes

that this results means that these 49% of respondents represent a user group that as "no preference" regarding the presence of off-leash dogs in GGNRA. This assumption is false, because the survey results did not question the respondents as to what their attitudes would be if the respondents had experienced some type of negative behavior associated with off-leash dogs, such as categorized by Vaske & Donnelly (2007). (This false assumption should have been obvious to NPS, as over half of the respondents opposed off-leash dog walking.)

A more rigorous interpretation of the results of the 2002 Social Research Laboratory by reference to the study by Vaske & Donnelly (2007) suggest a more likely characterization of user groups is that the 36% of respondents who "strongly oppose" off-leash dog walking in GGNRA as identified by the survey represent a collection of user groups who have extraordinary safety concerns, general safety concerns, and/or find that many of the negative behaviors of off-leash dogs strongly impact their visitor experience. It is likely that the 17% of respondents who "somewhat oppose" off-leash dog walking have some safety concerns and/or find negative behaviors associated with dogs moderately impact their visitor experience.

It is possibly or even likely that the 36% figure of respondents strongly opposing off-leash dog walking represents an approximation for the proportion of visitors who would likely be displaced from areas where off-leash dog walking occurs and cannot be avoided by visitors.

No doubt that dog owners wishing to walk their dogs just as vehemently want access to off-leash dog walking areas as those who wish to avoid dogs. NPS must recognize that ultimately off-leash dog walking not only diminishes the visitor experience for many but even excludes a large proportion of potential visitors.

P. 1591 Human Health and Safety

Although actual attacks involving dogs biting and knocking down visitors to GGNRA may be relatively infrequent, any exposure to off-leash dogs potentially involves considerable risk. Certain user groups, such as the elderly and young children, are known to be particularly vulnerable to serious injury when bitten by a dog. More troubling, it is not possible to predict when and where a serious attack might occur. One study showed that in the case of serious attacks by dogs on a child, 66% of dogs had never previously bitten a child, and 19% had never bitten any human and 66% of owners had taken their dogs to obedience training classes (Risner et al. 2007). According to Dr. Gail C. Golab, director of the American Veterinary Medical Association's Animal Welfare Division, "Any dog can bite? Even the gentlest dog, if it is physically or mentally unhealthy, is in pain, feels threatened, or is protecting its food or a favorite toy, can bite (quoted in

USPS 2011)." When an attack does occur, there is a significant chance of a fatality. One study estimated that a risk of 2 fatalities per 1,000 reported dog bites exists nationwide (Wright 1985).

A dog bite is a common type of injury (Holmquist & Elixhauser 2010). One study found that approximately 1 in 50 patients treated in emergency rooms suffered from a dog bite (Beck et al. 1975). It is estimated that half of all children in the U.S. suffer a dog bit injury by the time they are high school seniors (Dr. Alison Tothy, American Academy of Pediatrics, Illinois Chapter, quoted in USPS 2011). The exposure to risk increases in areas of GGNRA that became crowded in terms of both visitors and dogs. Visitors may have few opportunities to avoid direct encounters with off-leash dogs. In addition groups of dogs such as brought by commercial dog walker or that form when various visitors allow their dogs to congregate increase the safety risk due to aggression characteristic of pack walking and the increased likelihood of social and re-directed aggression .

Visitors to GGNRA who have been bitten by a dog or who recognize the danger of off-leash dogs may well have a fear of dogs that would limit their enjoyment or preclude their visiting an area where off-leash dogs are allowed.

Although few studies seem to exist regarding human psychology and attitudes towards negative behaviors of dogs, NPS needs to recognize that potential safety issues are very real in the minds of visitors and have a significant impact on an individual's psychology and ability to enjoy the visiting experience. Niktina-den Besten (2008) found that the presence of dogs was a significant negative factor in the child's mental map of a neighborhood.

The Draft does not acknowledge that visitors to areas where off-leash dogs are allowed are potentially subjected to unmitigated encounters with large and powerful off-leash dogs. There is little the visitor can do to mitigate exposure to the risk of being charged or attacked by dogs in such cases. Such encounters can be especially frightening in relatively isolated areas with no cover, such as Ocean Beach.

One implication of my analysis of the impacts of dogs on visitor experience and human health and safety is that major areas of GGNRA should provide access to visitors to allow them to experience significant portions of each area without encountering off-leash dogs. For example, at Fort Funston, visitors should be able to enjoy portions of the bluff and beach and a pathway in between without encountering off-leash dogs.

P. 1595 Human Health and Safety / Park Staff Health and Safety Impacts
The belligerent behavior of some dog walkers towards NPS Staff should not

be considered as a factor in the Plan. A user group that resorts to intimidation and violence should not be rewarded with mention in this context. Park staff should be trained and equipped to enforce laws and regulations in the public interest.

Appendix E: Guidelines for ROLAs ? Voice Control The guidelines for ROLAs require dogs to be under "voice and sight control at all times, meaning that dogwalkers must be able to recall their dog promptly, and shall demonstrate this when required by Law Enforcement personnel." As written, this requirement is meaningless and unenforceable. An individual might be able to demonstrate voice control in one situation, when in a more crowded environment or in a location with a large flock of birds or other tempting wildlife targets, the dog might react completely differently. I suspect that NPS has issued very few citations for 36 CFR 2.34(a)(4) and that such a code would not be an effective tool for insuring that "voice control" guidelines are followed.

In my experience "voice control" has in any case not been a successful or realistic concept. Dogs owners frequently do not consider it necessary to prevent their dogs from engaging in harmful and disruptive behaviors such as categorized by Vaske & Donnelly (2007). When they do show sensitively towards impacts on other visitors, dogs, or wildlife, the owners frequently do not attempt to control the dog until the harmful behavior has already occurred. It does not make any difference if a dog owner can "promptly" recall a dog, if the harmful behavior has already occurred. It does not seem possible that a commercial dog walker or any other park user walking two or more dogs could effectively exercise "voice and sight control at all times" over all his/her dogs.

Furthermore, although relying on the concept of voice control for decades, it does not appear that GGNRA has ever evaluated the effectiveness of voice control. In responding to a FOIA request for records of citations issued related to failure to exercise voice control, GGNRA reported that they had no way of searching their records for that information. Available information suggests that voice control is not effective in protecting wildlife or visitor experience.

By proposing an unproven and untested concept of "voice control," NPS would be creating zones where visitor safety and wildlife protection could not be assured. This has essentially been the status quo for most of GGNRA in past years. However, if such areas are formalized and legalized, visitors from vulnerable user groups should be warned not to enter these areas, as their safety cannot be guaranteed.

A "voice and sight control" regulated area in Boulder County, CO did not

prevent disturbance of wildlife (Lenth et al. 2008).

GGNRA should analyze dog citations by zip code to determine whether education is even a feasible method of increasing compliance with restrictions on dog walking. If citations are mostly for dog owners in the media market near GGNRA, it is unlikely that any action but increased enforcement would change compliance rates.

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Correspondence ID: 3691 **Project:** 11759 **Document:** 38106

Received: May,28,2011 10:42:41

Correspondence Type: Web Form

Correspondence: Dogs should NOT be allowed to run free, off leash, any place they or their owners like. I love dogs, love state parks, Volunteer at Candlestick SRA, but I'm 70 years old and get very nervous when large loose dogs are bounding around. Areas where dogs are allowed should be enclosed so you have a choice whether to have dogs in your outing or not. Separate dog areas could also help preserve native plants and animals from sometimes destructive dog activities. I saw a large dog, digging and chasing a ground squirrel, wreak havoc in a pristine wildflower area.

Commercial dog walkers also probably ought to have some sort of controls - maybe limited to 3 dogs on leash or not allowed in certain areas. It's a commercial enterprise using park resources, public resources. There ought to be some limits.

Correspondence ID: 3692 **Project:** 11759 **Document:** 38106

Received: May,28,2011 10:56:53

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, My name is Nathan Logan Hanley. I am an independent filmmaker living in Portola Valley. I am also an avid dog enthusiast and consider myself to be very environmentally conscious. I have had the luxury of being able to call some of my best friends over the years dogs; and have also made very frequent visits with them to Fort Funston so that they could mingle with other dogs, run, and have fun. I have been very grateful in being able to do so and I know they have been too. The thought that the GGNRA is considering such a drastic move when it comes to Fort Funston and other off leash dog areas simply breaks my heart. I have just one dog now, my good friend Elijah; and his freedom at Fort Funston is a weekly jaunt that

brings both of us so much pleasure. It would be a true injustice to have that taken away by poor judgment or rash decision making. Suffice to say, I really do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Nathan Logan Hanley Portola Valley, CA. 94028

Correspondence ID: 3693 **Project:** 11759 **Document:** 38106

Received: May,28,2011 00:00:00

Correspondence Type: Web Form

Correspondence: My dog has been enjoying the Park immensely, even though it is far from my house. I never hesitate to drive up there. My dog is a very friendly Goldn Retriever and enjoy meeting all of other dogs, especially when he sees the beach to dive in! Boy, does he enjoy running the trail and into the water to swim and run around the beach with so many other dogs. All the dogs are very frinendly and we, dog lovers make sure that we all clean the dog mess

and keep clean the Park. If you close this Park, we have no place our dogs to run freely and enjoy the open field with many other friendly dogs and dog owners - as you may guessed that we, owners of dogs enjoy the beautiful Park just as much as our dogs. Please don not take away this joy from us all. I have never met any unfriendly dogs nor incidents of fights amongs pets. I don't see nay reason to enforce the leash law, if you witness how happy all the dogs and how friendly they are. We, all the animal lovers urge you not to close this happy haven for animals as well as people.

Thank you.

Correspondence ID: 3694 **Project:** 11759 **Document:** 38106
Received: May,28,2011 11:15:50
Correspondence Type: Web Form
Correspondence: To whom it may concern re: the draft Dog Management Plan.

Dogs can have significant negative impacts on wildlife, native habitat, and other park users if they are uncontrolled and in large numbers. We must also ensure that any recreation in the National Park respects the natural and cultural values that are intended to be enjoyed by all.

Dog recreation areas should be enclosed to protect wildlife, habitats, and other park users. Commercial dog-walking is not an appropriate activity in the park. There should be more trails in San Francisco that are closed to dogs.

Thank for your time, Fred Rinne

Correspondence ID: 3695 **Project:** 11759 **Document:** 38106
Received: May,28,2011 11:22:27
Correspondence Type: Web Form
Correspondence: I've seen numerous dog attacks, (dog vs. dog) and also many frightened people, including myself, when dogs have charged, barked, and basically threatened people for whatever reason dogs do that. I hate going anywhere that there are no leash laws, especially in a public area. Fort Funston is also a tourist area, and it's just bad news when you have 100+ dogs running openly in a parking lot/visitor area. I would suggest a leash law in the parking lot and visitor area, and off leash for the beach and surrounding open space areas. I'm a dog owner, I love dogs, and I believe it's lack of owner responsibility for the most part, but dogs are an animal, and they have their own way of doing things, and from time to time their predator instincts come out and people and or other animals are injured or killed.

Gary

Correspondence ID: 3696 **Project:** 11759 **Document:** 38106
Received: May,28,2011 11:47:32
Correspondence Type: Web Form
Correspondence: I am in various areas of the Golden Gate National Recreation Area almost every single day. Often for work, and sometimes just for the sheer joy of it. I love the park. It is one of the gems of Bay Area.

I completely support the proposed preferred alternative dog management plan. In fact, I would support a significantly more restrictive plan. I enjoy most dogs, but I also like having an area to be away from them and the risks they represent. A national park where the mission is to protect multiple species seems the right place to restrict dogs. I've seen so many people who have a sense of entitlement ruin nice days in the park with their off leash dogs - dogs that don't get cleaned up after, dogs that dig, dogs that chase wildlife, dogs that scare children, and on and on.

The rules must be understandable and enforceable. So while it might be nice to say, for example, that East Beach could be off leash until 8am and after 6pm, that is difficult to sign. (How many visitors read signs anyway?) Even on-leash dogs (and dog owners) can be problematic for the park and park resources. GGNRA was not established to be a dog park.

When looking at the dog management plan, I think it is wise to ask: is this good for the park? Does this support the NPS mission? Everything else should be mitigated and I think you have a wise plan to do so.

Correspondence ID: 3697 **Project:** 11759 **Document:** 38106
Received: May,28,2011 11:59:57
Correspondence Type: Web Form
Correspondence: I strongly believe that multi-use open space that includes off-leash dogwalking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA. All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement the National Park Service inappropriately singles out dogs. Its conclusions are not based upon sound science nor long-term monitoring of site-specific conditions. Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of

park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources. The GGNRA was created to provide open space for recreation (including dogwalking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo county). Respectfully, Jan Corlett, San Francisco

Correspondence ID: 3698 **Project:** 11759 **Document:** 38106

Received: May,28,2011 12:01:15

Correspondence Type: Web Form

Correspondence: To Frank Dean. Dear Sir, I am a resident of San Francisco, and a native, born at Letterman General Hospital. I have always had a dog in my home. First in the Presidio when growing up and then in San Francisco. I have always enjoyed their company, their loyalty, and their unconditional love. It is very wrong for the government to take away the right of dog owners to have access to the system of parks and open spaces where they can bring their dog to exercise and run free when it is not infringing on anyone else. I have visited Fort Funston many times and the dogs there are well behaved and under control of their owners and dog walkers. There are only dog people walking in that area with a few other sight seers who love the dogs. The open land is supposed to be for the people to enjoy not for the officials to take away. It is for recreational use of the people who live in city areas. The government is supposed to be for the people, it is paid by the people, and should be answerable to the people. Do not take away our rightful recreational property. Do not turn against those things that have been entrusted to you as public servants for the people of this area. Sincerely, M. Damir, resident of San Francisco for 76 years

Correspondence ID: 3699 **Project:** 11759 **Document:** 38106

Received: May,28,2011 12:36:18

Correspondence Type: Web Form

Correspondence: Clearly, NPS has bent over backwards to accommodate dogs in and around San Francisco.

Having worked for three springs to monitor butterflies on Milagra Ridge, I have seen endless parades of off-leash dogs and do not enjoy being jumped on or approached. My preference would be for NO dogs in areas where there are protected species, but I would be even happier to see no dogs or

excrement at all in GGNRA lands. Restricting dogs to paved roads and paths as the California State Beaches do would be my strong preference.

It has been dramatic recently how most dog owners locally have leashed their dogs knowing that the management plan is being considered. I fear that once the comment period is over the leashes will again come off.

Given the effort of GGNRA to present alternatives, my choice of the alternatives would be "D" with the addition of better compliance, 95% at a minimum. There must be serious consequences for non-compliance, too.

Thank you for your efforts.

Correspondence ID: 3700 **Project:** 11759 **Document:** 38106

Received: May,28,2011 12:40:08

Correspondence Type: Web Form

Correspondence: Thank you for the opportunity to comment on the GGNRA Draft Dog Management Plan. Clearly, the GGNRA is an important and much loved resource here in the Bay Area, accommodating many different experiences and values. While dogs are much loved members of our community, some impacts of these animals (and, unfortunately, disregard by their owners) can and has led to significant harm to the many hundreds of other species which depend upon the park habitats. Please bear in mind that, despite the vociferousness of some dog owners and their organized opposition, it is incumbent upon all of us to accept certain limits and regulations to ensure the survival and well-being of all of the park's natural resources and to foster the full range of enjoyment from visits to the GGNRA.

Understanding the goals of the National Park Service, it would be simplest to institute the same regulations in GGNRA as are mandated throughout the NPS (i.e. "Alternative B") but, owing to the extreme politicization of this policy over the past decade, this seems to be fruitless. While I therefore understand the need for exceptions, some policies cannot be condoned in NPS areas. In particular, permitting commercial dog-walking is inappropriate. A firm limit of 3 dogs per visitor is prudent, as it is unlikely that more than this number of dogs could be reasonably controlled at any time by most people. Furthermore, if any sites are to be designated as "off-leash", they must be clearly marked and bordered, preferably fenced for the protection of other park visitors (and the dogs themselves), and to prevent damage to surrounding resources.

It is imperative, whatever agreed policy is implemented, that leash and voice control requirements be strictly enforced in all areas at all times. We have already seen that lack of enforcement under the existing rules has led to

erosion of the rules such that many areas have become de facto off-leash areas. This cannot continue if the NPS is to ensure the safety of all visitors and protection of natural resources. In particular, the stated aim of 75% compliance with leash and voice control requirements is far too low. History has shown (and I have too frequently observed when hiking or bird-watching in multiple areas) that a lack of continuous enforcement has led to wide disregard of the regulations, even in designated habitat conservation sites (such as the Snowy Plover Wildlife Protection Area at Crissy Field). The NPS should expect full compliance with all rules, and set a goal of 95% compliance with leash and voice control rules for dog use as a trigger for more restrictive policy.

So what should be the dog use policy for the GGNRA? In my view, protection of all of the natural resources in the GGNRA should be paramount if we are to ensure the survival of the area and to allow the widest range of user experiences. In general, therefore, I favor Alternative D (Most Protective), as it allows for dog walking and exercise but most fully protects resources and visitors by reducing circumstances that could cause conflicts or harm. No commercial dog walking, period. However, I understand the need to balance some "traditional" practices in a few selected areas, and would support the NPS' "Preferred Alternative" in a few places (i.e. Fort Mason, Muir Beach). Whatever policy is adopted, per my comments above, the areas must be monitored and rules must be strictly enforced.

Please persevere in your efforts to design an acceptable and workable dog use policy for the GGNRA, allowing for the enjoyment of "man's best friends" as well as the protection of all of the park's resources. I urge you to select the Environmentally Preferable Alternative, and to insist on full monitoring and compliance with the policy and rules to ensure the survival of precious natural resources and to allow for the full enjoyment of the park for the widest range of visitors.

Thank you for incorporating my comments in the decision making process.

Sincerely, Richard Bradus, M.D.

Correspondence ID: 3701 **Project:** 11759 **Document:** 38106
Received: May,28,2011 12:52:16
Correspondence Type: Web Form
Correspondence: Sierra Club San Francisco Bay Chapter Serving Alameda, Contra Costa, Marin and San Francisco Counties

May 28, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123 RE: GGNRA Draft
Dog Management Plan/Environmental Impact Statement (DEIS)

Dear Superintendent Dean:

The Sierra Club, San Francisco Bay Chapter urges the GGNRA to reject the Preferred Alternative identified in the above referenced DEIS due to that Alternative's inadequacy in protecting native plant and wildlife species, including listed species, as well as its failure to provide undisturbed national park experiences (nature recreation, education and science) to its visitors due to the impacts of off-leash and leashed dogs.

Instead, we urge you to adopt Alternative D, "Most Protective of Resource" as the alternative most appropriate for implementing a GGNRA Dog Management Plan that protects the parks natural resources and provides appropriate visitor experiences. We also urge you to add a further component to Alternative D. We believe it is essential that ROLAs be delineated by physical boundaries in order for dog walkers to more easily determine the location of these ROLAs and to facilitate enforcement of ROLAs by providing clearly discernible borders.

Protection of Natural Resources Compels Alternative D

We believe the scientific literature is clear in concluding that both off-leash and leashed dogs significantly impact our natural environment. This conclusion was recently reinforced in a study reported in the journal *BioScience* 61(2):125-132. 2011 doi: 10.1525/bio.2011.61.2.7, "Is Wildlife Going to the Dogs? Impacts of Feral and Free-Roaming Dogs on Wildlife Populations", by Julie K. Young, Kirk A. Olson, Richard P. Reading, Sukh Amgalanbaatar and Joel Berger. This study concludes that, "dogs can significantly disrupt or modify intact ecosystems well beyond the areas occupied by people [abstract]".

Impacts to Migrating Waterbirds Shorebird studies (e.g., Guts Don't Fly: Small Digestive Organs in Obese Bar-Tailed Godwits, Theunis Piersma and Robert E. Gill, Jr., *The Auk*, Vol. 115, No. 1 (Jan., 1998), pp. 196-203) have shown that migrating shorebirds can alter their morphology and convert their internal organs including their digestive tracts into energy (fatty tissue) for long migratory flights. Upon their arrival at migratory feeding grounds these shorebirds need to feed continuously and studies have documented feeding up to 18 hours a day. If disturbed from such feeding they may not survive further stages in their migratory journey.

Unleashed dogs on beaches are well known to disturb feeding waterbirds thus potentially causing this delayed mortality. This is a significant impact and greatly diminishes the functional value of Ocean Beach and Crissy Field as well as Rodeo Beach and Muir Beach and other GGNRA beaches for migrating waterbirds.

Only Alternative D would provide shorebirds and other waterbirds that use GGNRA beaches for nesting, foraging and roosting with beaches that are free from the energy consumptive disturbances that result from unleashed and leashed dogs.

Impacts to Listed Species We were disappointed that you did not more fully emphasize the Lafferty studies at Sands Beach, Coal Oil Point Reserve in Santa Barbara, California. This study demonstrated that human recreation on beaches and particularly off-leash dogs pose a significant problem for the viability of nesting snowy plovers. In fact, no snowy plovers had successfully fledged on this beach for 30 years. A management regime that included a physical boundary around a proposed nesting area and the prohibition of off-leash dogs resulted in the success of snowy plover nesting after initiation of that regime.

The federal Endangered Species Act states in Section 2 that "[i]t is further declared to be the policy of Congress that all Federal departments and agencies shall seek to conserve endangered species and threatened species"(16 U.S.C. '1531(c)). The ESA also states in Section 3(3) that, "[T]he terms "'conserve", "conserving" and "conservation" means to use?all methods and procedures which are necessary to bring an endangered species or threatened species to the point at which the measures provided pursuant to this chapter are no longer necessary?" In other words, all Federal agencies should help in the effort to remove threatened or endangered species from the endangered species list. Since one of the goals of the NPS is preserve our nation's wildlife and plant species this instruction holds particularly true. This is a much higher test than simply protecting a species. Under the ESA there is a requirement for the NPS to actually help "recover" the species, i.e. bring it back from the brink of extinction, and this means increase its population if possible and then sustain those increases.

Thus, in determining appropriate levels of dog use in GGNRA particular attention must be paid to those areas that provide listed species habitat. Ocean Beach and Crissy Field are two areas that support the listed Western snowy plover. The Lafferty research demonstrates that with a significant reduction in disturbance, especially from off-leash dogs, snowy plovers can successfully nest on these beaches and thus increase the total snowy plover population. We believe that it is incumbent upon the NPS to implement such management regimes at these two sites, and any others that support listed

species, in order to comply with the federal ESA obligations cited above.

This would entail the prohibition of off-leash dogs on Ocean beach and Crissy Field. Alternative C does provide for some of this protection but we believe it is inadequate. Alternative D would provide the greatest opportunity for the Western snowy plover to have successful nesting seasons at these beaches, and others in the GGNRA.

Barriers around ROLAs.

The Lafferty study was quite clear that signage alone was inadequate to instill public compliance with a prohibited access area. On the other hand, a minimal fence in combination with a docent program was quite successful. The minimal fence alone was also inadequate, although better than the signage alone. This demonstrates that the management regime for ROLAs proposed in all alternatives is doomed to failure. Without a physical barrier and some human presence, be it educational docents or enforcement staff, the boundaries of a signed-only ROLA will be ignored. (We argue that since a barrier and docent were necessary to keep off-leash dogs out of an area, it is likewise necessary to have barriers and docents to keep off-leash dogs in a ROLA.)

For this reason we believe that Alternative D (or the Preferred Alternative, although not our choice or any of the other alternatives, if chosen) must include physical barriers around all ROLAs. Again, the Lafferty study demonstrated that effective compliance was developed only with a physical demarcation and the presence of docents. Signage alone was completely ineffective.

Studies have also shown that leashed dogs may also disturb wildlife, Wildlife Responses to Pedestrians and Dogs, Scott G. Miller, Richard L. Knight and Clinton K. Miller Wildlife Society Bulletin, Vol. 29, No. 1 (Spring, 2001), pp. 124-132. Impacts take place both on beaches and trails and leashed and off-leash dogs cause disturbances that affects both plants (digging up vegetation and causing erosion, as adequately explained in the DEIS) and animals. Thus all of the above arguments for choosing Alternative D as the best alternative for GGNRA apply to both leashed and off-leash dogs.

Impacts to visitor experience

As described in the DEIS, both off-leash and leashed dogs can diminish the enjoyment of national parks for those people who are not comfortable around, or are afraid of, dogs. Dogs can harm seniors with stability problems simply by jumping on them and can injure children who are not

aware of how to behave around dogs.

None of these experiences are appropriate for a national park. Alternative C provides for a large number of ROLAs and a very large amount of trails proposed for leashed dogs. Under the Preferred Alternative, only one GGNRA trail in San Francisco is proposed to be totally free of leashed and off-leashed dogs.

This will make most trails in the GGNRA in San Francisco unusable to the populations described above who find dogs, for whatever reason, a deterrent to trail use.

Only Alternative D will provide all GGNRA visitors a national park experience that is free from the impacts of leashed and off-leashed dogs on a majority of its trails.

Conclusion

The Mission of the National Park Service is to, "conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." (NPS Organic Act)."

A plain reading of this Mission dictates that the GGNRA adopt Alternative D.

Leashed and off-leash dogs have significant impacts on vegetation, soils, and wildlife. The excessive presence of leashed and off-leashed dogs as proposed in the Preferred Alternative can only result in a failure to "conserve the scenery and the natural and historic objects and the wild therein?"

Leashed and off-leash dogs have negative impacts on many segments of our citizenry. Leashed and off-leash dogs can interfere with the ability of visitors to appreciate the GGNRA or even result in some visitors avoiding parts of the GGNRA thus reducing the ability of the GGNRA to provide for "the enjoyment of future generations?"

For all of the reasons cited above, we urge the GGNRA to adopt Alternative D for its Dog Management Plan.

Thank you for your consideration of our views.

Yours, Arthur Feinstein, chair Sierra Club, San Francisco Bay Chapter

Correspondence ID: 3702 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: GGNRA Staff,

Please try to balance the needs of all of the users of our Bay Area natural resources. There are people who love walking with their dog(s) - people who consider their dog a family member, and there are people who are disturbed by or scared of dogs. Please leave some areas in Marin, San Francisco and the Peninsula for on-leash dog walking. I understand that the most environmentally sensitive areas need to be off-limits to leashed dogs, or at least seasonally off-limits.

Also, please leave a few areas for off-leash, voice-controlled dogs. It is wonderful to watch the joy that off-leash socializing gives to dogs. You could allow at least one prominent area south of San Francisco, one on the north side of San Francisco, and one in Marin to be for off-leash dog walking. Fort Funston and parts of Crissy Field are good examples. If the off-leash designation is official and well-known, and if the signage is good, than people who do not want to hike with off-leash dogs will know to hike elsewhere, in one of the many other natural areas available to them.

This is the San Francisco Bay Area. We have a history of being inclusive and not discriminating against others. Please continue this tradition by making room for both types of users of the GGNRA - those with dogs and those without.

Thank you.

Correspondence ID: 3703 **Project:** 11759 **Document:** 38106
Received: May,28,2011 13:42:42
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean,

Thank you to you and your staff for the thoughtful development of the dog management plan that strives to maintain the delicate balance between wildlife habitat and human recreation in a beautiful natural landscape that makes the Golden Gate National Recreation Area (GGNRA) so special. As a veterinarian working at The Marine Mammal Center in the GGNRA, and as a tenant living within the GGNRA, I really appreciate the difficulty of balancing the needs of different constituents, wildlife and the delicate coastal habitat. I have lived in the Marin Headlands for over 10 years, and

regularly walk along Rodeo Beach, although I am not currently a dog owner, where I observe dogs and their owners enjoying running in the surf. I will always remember meeting a father of a special-needs young boy who was playing in the intertidal area with his dog, and hearing that it was the one place locally they could come a feel free and one with nature. Throughout these years, I have not observed dogs disturbing marine mammals there, and in fact, The Marine Mammal Center occasionally releases rehabilitated animals off Rodeo Beach due to its proximity to the Center and its suitability as an access point to coastal waters for sea lions.

I thus support the DEIS preferred alternative C for Rodeo Beach, and hope that this area can remain an off-leash area for dogs under the guidelines in the DEIS. I could not find specifics on whether dogs would be allowed on leash between the housing in the Headlands and the trailheads on which dogs will be allowed on leash. I hope that on-leash dog walking from housing to trailheads will be allowed, so the residents and their visitors who have dogs will not be compelled to drive short distances to comply with new regulations.

I truly appreciate the work that has gone into this plan, and I hope alternatives will be chosen that can balance the needs of wildlife, habitat and Park visitors.

Correspondence ID: 3704 **Project:** 11759 **Document:** 38106
Received: May,28,2011 13:46:54
Correspondence Type: Web Form
Correspondence: I am writing in opposition of the the GGNRA's Draft Dog Management Plan and EIR. As a long-time San Francisco resident and dog owner, I simply cannot fathom why the Park Service is attempting to railroad through these onerous new restrictions without a single shred of evidence that dogs pose any threat to the well-being of the RECREATION AREA (not "National Park"), and without going through the due process of public hearings mandated by law.

Quite simply, you are inviting a lawsuit- one which I will gladly support and in which we, the 200,000-strong San Francisco dog owners are almost assured victory based on the outcome of previous similar cases. Frankly, you have wasted taxpayer dollars throughout this process, and you are about to waste even more defending these unsupportable rules.

Do dogs chase endangered birds? According to your own (white elephant, insanely expensive and altogether inconclusive) EIR, there were FAR more instances of humans (particularly small children) harassing birds in the GGNRA during the study period. Do you intend to ban children from the

Recreation Area as well to protect your precious birds?

Does dog waste pollute the Recreation Area? No more so than waste from other animals- not to mention human waste from the derelicts you tolerate living and sleeping in the parks. Where is the plan to prevent people from relieving themselves in the GGNRA?

Do they make certain people feel uncomfortable? WHO CARES? Currently less than 1% of the entire GGNRA land is available for off-leash recreation, leaving TENS OF THOUSANDS OF ACRES available for peaceful enjoyment of non-dog-lovers. Let them use the 99% of the Recreation Area that we can't. The point of the GGNRA is to offer recreational opportunities to all types of people- and off-leash dog walking is one of the most prevalent forms of such recreation in San Francisco. I can't remember the last time I played soccer, or football, or baseball, but I walk my dog EVERY DAY.

Perhaps the most insulting and disturbing aspect of this process is your feeble and thinly-veiled attempt to circumvent due process and disenfranchise the public via your silly "public meetings"- in which no microphone was provided for those opposed to the plan to voice their concerns. You should be ASHAMED of the way this was handled, though it is clear from these actions that you were afraid of allowing the public to point out the inanity of your plans and the shortcomings of the EIR on which you wasted so much time and money. Under the guise of a storied American institution (the NPS) you violated everything that American supposedly stands for- most importantly, public involvement in the political and legislative process and local control of public facilities.

The San Francisco Board of Supervisors recently voted 11-1 in favor of a resolution supporting dog-owners' rights and opposing this ludicrous plan. Please stand reminded that the Board has the authority to wrest control of the portions of the Recreation Area within our city limits back from the NPS. These lands were granted to you in trust, but with the caveat that San Francisco could reclaim them should you fail to administer them in a way that meets the needs of all San Franciscans, including dog owners. Should this plan go forward, we will lobby our Supervisors to kick the NPS out of SF once and for all and return areas like Chrissy Field and Fort Funston to their originally-intended recreational purposes.

This plan is absurd and should never have been proposed. If you pass the rules as outlined we will fight on tirelessly until we win.

Correspondence ID: 3705 **Project:** 11759 **Document:** 38106
Received: May,28,2011 13:50:58

Correspondence Web Form

Type:

Correspondence: As a frequent user of the parks, I have been concerned for some time about the increasing number of dogs allowed in the parks, particularly off-leash, and especially in beach and riparian areas. Although my primary concern is the disruption of wildlife habitat, I also feel that there are virtually no park areas left where a person can take a walk, observe nature, meditate, etc., without the presence of dogs.

Far too often I encounter ill-trained dogs off-leash, chasing shore birds, etc., and sometimes being actively encouraged by their owners to do so. I generally find that if I attempt to approach these people to voice my concerns, I am met with hostility.

On occasion dogs have jumped up on me, sometimes quite forcefully, and I have been left with muddied clothing and in one instance a knee injury. Sometimes the owners have been apologetic, but other times they just laugh at how playful their dogs are, as if no one could possibly experience discomfort at the prospect of being run into and jumped upon by a 50-pound animal. I was in a picnic area once designated as on-leash only, and a dog ran up and ate the hot dog right off of my plate. When I said something to its owner about the leash rule, he told me that I needed to educate myself about the park rules, as it was okay to have a dog off leash if it was under voice control. This struck me as so absurd, given the circumstances, that I did not bother to respond.

I could go on at length about other encounters with dog owners that left me feeling discouraged and disturbed, but the gist of my point is that I do not believe that rules for either on-leash or voice-control areas are enforceable, simply because most people do not obey the rules and there is no one to see that they do. I don't think that either dogs or dog owners are inherently bad. But I do think that we have become a "dog society" in which, no matter what the rules, dog owners do not really believe that they apply to them. Alternatively, I sometimes speak to people who had no idea that dogs were not allowed in a particular section, or only allowed on-leash. And I have to say that these designations are easy to blur. If an area is designated on-leash only, dogs will be off leash. If an area is voice-control, dogs will be running around without any supervision.

I worry that the dog ownership coalition is so large and vocal that people who prefer to enjoy nature without dogs are simply discounted. Moreover, I find it somewhat shocking that in the Bay Area, which I have always thought of as progressive, there would be such a lack of focus on wildlife habitat, which is shrinking all of the time. There needs to be a greater focus on our wildlife and environment. If we need stringent laws, with real enforcement and penalties for breaking them to bring this about, then those

laws should be implemented.

Thank you for your consideration.

Correspondence ID: 3706 **Project:** 11759 **Document:** 38106

Received: May,28,2011 13:52:17

Correspondence Type: Web Form

Correspondence: As a frequent user of the parks, I have been concerned for some time about the increasing number of dogs allowed in the parks, particularly off-leash, and especially in beach and riparian areas. Although my primary concern is the disruption of wildlife habitat, I also feel that there are virtually no park areas left where a person can take a walk, observe nature, meditate, etc., without the presence of dogs.

Far too often I encounter ill-trained dogs off-leash, chasing shore birds, etc., and sometimes being actively encouraged by their owners to do so. I generally find that if I attempt to approach these people to voice my concerns, I am met with hostility.

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Thank you for your consideration.

Correspondence ID: 3707 **Project:** 11759 **Document:** 38106
Received: May,28,2011 13:55:44
Correspondence Type: Web Form
Correspondence: (copy of comments emailed to parkplanning@nps.org)

May 28, 2011

Dear General Superintendent Dean:

I am a resident of Pacific Heights, on the Board of Directors of the Pacific Heights Residents Association, and a representative to NAPP. I am also a dog owner. In one role or another, I have been working on the "dog issue" since 1970, the year I arrived in San Francisco, and the start of the hard-fought battle for the Pet Policy, which was finally issued in 1979. In this transmission, I speak only on behalf of myself, a responsible dog owner who uses Crissy Field almost daily, who picks up after my own dog and anyone else's dog that may have left something behind.

I also am aware that the NPS has a legislative right to curtail off-leash dog walking in certain areas of the Presidio and the GGNRA, if that is deemed to be necessary. However, I consider its proposed solutions for off-leash dog walking draconian. I have issues with all of the plans except the no change version.

The areas proposed for off-leash dog walking in San Francisco in the Preferred Plan are so limited that most local residents wishing to exercise their dogs off-leash will opt out of taking them to Crissy Field and go to one of the City's parks. I don't think that the City of San Francisco should have to absorb the users of former City-run and owned property into its parks because the NPS has issued its third plan to keep us off its turf.

The comments that follow refer only to the Crissy Field area, because I am

most familiar with it.

The two areas selected for off-leash dog walking in the Preferred Plan discriminate against people with disabilities: Central Beach is, of course, sand, and that is a very difficult surface for people who have walking or pulmonary problems. Walking on sand takes a lot more energy than walking on a firm surface. For people in wheel chairs, it probably precludes them for using it.

Similarly, the grassy areas of the former landing strip are lumpy and difficult to walk on.

At both areas, there is insufficient access to adequate parking close by to accommodate handicapped dog owners who have come to Crissy Field to exercise their dogs.

I have pulmonary problems and enjoy off-leash dog walking on the Promenade. On the Promenade, bicyclists are a problem because most of them ignore the posted 5 MPH speed limit. The riders with dogs are the most egregious abusers of disposing of their dogs' feces because they ride far ahead of their sniffing, social pets.

I could be somewhat satisfied with access limited to Central Beach + the southern half of the former airstrip -- **IN ADDITION TO THE PROMENADE AND BEACH ACCESS BEGINNING ON THE WEST SIDE OF THE BRIDGE TO THE WESTERN END OF CENTRAL BEACH.** This suggestion does not address the added burden to City open space by limiting off-leash walking as much as you have suggested.

I would also like to point our that on rainy and/or winter days, dog walkers are the main users of Crissy Field.

Thank you for considering these issues and suggestions.

Sincerely,

Margot Parke

Correspondence ID: 3708 **Project:** 11759 **Document:** 38106
Received: May,28,2011 13:56:44
Correspondence Type: Web Form
Correspondence: May 25, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean,

I am a 64 year old senior and since I retired from a professional career at the University of California San Francisco, I take my dog to Ft. Funston 4 times a week. I have an energetic dog and off-leash activity is important.

Since I moved to California in 1974, I have gone to Yosemite National Park at least twice a year. In the past 4 years I have participated in week or month long volunteer experiences with the Yosemite Association, Yosemite Conservancy and Sierra Club. I have been a member of the Sierra Club for over 20 years. I have been a docent at Crissy Field with the NPS in 2009-2010. In 2011, with Jose Roldan's approval, I had planned to transition to walking Crissy Field and answering questions. However, with the release of the GGNRA draft plan, I have been less active with the GGNRA.

I would like to address my dog experiences in Yosemite National Park and four of the areas that I frequent-Ft. Funston, Sweeney Ridge, Miwok-Wolf Ridge Trails, and Crissy Field-that are addressed in the GGNRA draft plan.

First, in Yosemite National Park dogs are allowed on all campgrounds, paved roads, paved bicycle paths, and sidewalks. That means you can walk your dog on leash on bicycle paths or roads to Mirror Lake and over 4 miles in the valley floor. Dogs are also allowed on-leash on the one way 4 mile Old Big Oak Flat Road from Hodgdon Meadow to Tuolumne Grove. I did part of this hike with my dog in 2010 and 2011. This road is in the middle of the wilderness. I am going into so much detail regarding Yosemite National Park dog regulations to show you that your new draft plan is more restrictive than Yosemite National Park.

Specifically, at present, dogs are allowed on leash at the Sweeney Ridge Trail. In the new draft plan this will be prohibited. The first 1.8 miles is a paved road. It then divides and continues one way as a paved road and the other way a dirt road. I have hiked this trail with a leashed dog for over 6 years. The area is used by many locals as a pleasant daily walk with their dogs. Recently I talked to everyone with a dog on that trail and most people had no idea that their dog walking activity would be prevented.

I have also hiked the Miwok-Wolf Ridge trail quite a lot. There are so few trails one can take a dog on-leash that to prohibit dogs on Sweeney Ridge and Miwok-Wolf Ridge would be very sad.

I love the off-leash activity at Ft Funston. To get to the beach at Ft. Funston is an ordeal and most people without a dog go someplace else where they can drive right up to the beach. I didn't see any horse restrictions in the GGNRA draft plan. Horses create much more erosion and the owners do not pick up after them.

Finally, I do agree with your plan to close the East Beach to dogs at Crissy Field. The beach at Crissy Field is very convenient and has become over populated with dogs and dog walkers. I do believe parents and children should have a place to go without dogs.

Thank you for your consideration. If you have any questions I would be happy to talk to you.

Jeannette Bonifas San Francisco, CA

Correspondence ID: 3709 **Project:** 11759 **Document:** 38106
Received: May,28,2011 14:05:15
Correspondence Type: Web Form
Correspondence: We have no where for dogs to run and play in the city. I have a child and a dog and I feel that we have to have large enough open spaces for everyone including dogs. Please keep Fort Funston available for the dogs to use. We need to all live together. San Francisco is a diverse place for all types. It's so expensive to live here and many of us don't have large yards for pets to play in. We need some open space or it makes living in San Francisco near impossible. Thank you

Correspondence ID: 3710 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose GGNRA's draft dog management plan. It is not based on fact; instead, it relies on speculations, exaggerations and misleading statements. It reaches conclusions that are not supported by either science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an <<urban recreation area>>, not a pristine wilderness area. The courts have repeatedly upheld the existing 1979 pet policy. They have said it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities and others.

The GGNRA draft dog management plan does not provide evidence to

justify such drastic changes to 40 years of healthy dog recreation. The National Park Service should revise the dog management plan to: 1. Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. 2. Provide for off- and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. 3. Exclude speculative, exaggerated, biased or misleading statements and studies. 4. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishers, surfers, bicyclists, beach-goers, joggers, walkers, etc.) 5. Align commercial dog walking rules with county or city regulations.

My suggestions are supported by the fact that as a San Francisco Native, and a current Marin County resident, I have been using the GGNRA lands for recreation, in particular recreational dog-walking, since it was created in 1972. My dearly departed Australian Shepherd Luna, who passed away on February 18, 2011, from Lymphoma, derived the greatest joy from playing ball in the surf a Muir Beach and Stinson Beach. We now have a 4-month-old Australian Shepherd, Bonita, and we want her to grow up to experience the same joy. Please don't deprive an active puppy of that joy of vigorous exercise.

There are enough "No Dogs Allowed" and "Dogs On Leash At All Times" public open spaces in the Bay Area. My daily exercise regimen includes exercising with my dog. Please don't deprive me of the right to exercise with my dog in the public open spaces of the GGNRA.

Thank you for your consideration.

Respectfully, Karen Engbretson Sausalito, CA

Correspondence ID: 3711 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by

offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3712 **Project:** 11759 **Document:** 38106

Received: May,28,2011 14:44:39

Correspondence Type: Web Form

Correspondence: As an owner of multiple dogs, the ability to take my dogs to hiking trails and beaches legally is something that has become an intrinsic part of our lives. It is something that we do on a weekly basis, as long as weather permits. These outings are so much a part of what makes the bay area a such a special and wonderful place to live for both people and their dogs. Both dogs and their companions hike, and relax. This fosters easy-going, happy and relaxed states of mind that in turn is also passed along to the community in the form of our interactions with each other. We are responsible dog owners who make sure that our dogs are well-behaved, free of disease and we always have poop bags on hand. There are already so many parts of the GGNRA where dogs are prohibited. I feel that this new dog plan is another way to slowly eliminate dogs from the GGNRA altogether. That will force dog owners to either use the parks and trails illegally or have to stay on city streets which are already congested and not a place for recreation. A study by National Geographic showed that there are more dogs in San Francisco than children under 18 years of age. All of these people and families need places to go and hike and run. Please don't take away the few places left that responsible dog owners can take their dogs off-leash. These places are so much about what makes the SF bayarea unique and special. Thank you!

Correspondence ID: 3713 **Project:** 11759 **Document:** 38106

Received: May,28,2011 14:45:55

Correspondence Type: Web Form

Correspondence: Firstly- PLEASE KEEP ALL THE PARKS OPEN- WE THE PEOPLE NEED TO STAY CONNECTED TO NATURE!!

Our family and friends' thoughts WRT "DOG MANAGEMENT":

Dogs/domestic animals on leash in all parks.. along with feces-pickup enforcement

No dogs/domestic animals in critical habitat!

Specified leash-free areas especially with strict feces-pickup enforcement

Dogs need outdoor space to run of course.. meanwhile we Need to keep feces out of ocean!

Thank you!

Correspondence ID: 3714 **Project:** 11759 **Document:** 38106

Received: May,28,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean:

I feel that dog walking qualifies as an appropriate use of a recreation area as defined by the enabling legislation. I feel off-leash dogs should be allowed in a portion of GGNRA property in proportion to the fraction of users that are dog walkers. There are three GGNRA properties with which I am familiar, Crissy Field and the Marin Headlands, where I walk dogs only occasionally; and Rancho Corral de Tierra (Rancho), where I walk dogs daily. The area defined for walking dogs off leash is far too small on Crissy Field, and your proposal to ban dogs entirely on Rancho is absurd. Apparently the current plan for the Rancho property involves opening it to horses and banning dogs. Although I have no objection to horses being on the property, dog walkers currently outnumber horse riders on the property by at least 20:1. Banning dogs entirely is obviously not in keeping with the wishes of the current users.

I also feel the Rancho property is a poor choice as a refuge for wildlife, although every effort should be made to preserve wildlife consistent with its use as a recreational property. As a Sierra Club member since 1972, I have and do support the need for wildlife sanctuaries. We already have wildlife sanctuaries nearby. The Rancho property has been in agricultural use for decades, and is bounded by a heavily used highway on one border and residences (in Montara) on two others. It should be best used for recreation, including off-leash dog walking, mountain bikes, running, hiking, and similar uses.

By supporting off-lease use by dogs, I do not mean to imply that the use by dogs should be totally without restriction or regulation. For many years the Marin Headlands had a successful plan in place for managing dogs, which included areas that were not open to dogs, areas that allowed dogs only on leash, and off-leash areas for dogs. The area which allowed off-leash dogs was very substantial, and included all or most of Rodeo Beach, along with

other areas. This plan seemed to be working for everyone, but was terminated several years ago for unknown reasons. For several years now the Rancho property has been successfully managed by a group of local residents, the Montara Dog Group, with no powers of enforcement. Nevertheless, voluntary participation is high, and there have been very few incidents. There are other examples of dog friendly areas, such as the beach at the city of Carmel, CA, which has been successfully open to off-leash dogs for decades.

It seems one of the reasons quoted for not allowing off-leash dogs is environmental impact. Through 30 years of off-leash dogs at Rancho, I have not observed any significant environmental effects. The objectivity of the park service in performing scientific studies is far from spotless, as the recent analysis of the Tomales Bay Oyster Farm by the NPS (which resulted in a negative review internal to the government and a letter criticizing the results from Senator Feinstein) illustrates.

When I attended the presentation in early March in Pacifica by the GGNRA on the Dog Management Plan, your representative said the GGNRA was trying to be "reasonable." If banning all dogs from the Rancho property is reasonable, I would like to know what your definition of "unreasonable" is. Residents of the Coastside in general and Montara in particular have long taken an interest in the Rancho property. There was an attempt to put in a gated community when Westinghouse owned the land. This was defeated by the late Nancy Maule and others, and Westinghouse moved the development to the south end of Half Moon Bay. Caltrans wanted to put in a bypass road going over the ridge on concrete pillars, which was also defeated (in favor of a tunnel) after a lot of local effort, including a ballot referendum. Later, another land developer wanted to put in 40 acre "ranchettes," on the property, which was defeated at the county level, again a local effort. We were initially happy that the GGNRA had agreed to purchase the land, which was followed by your banning dogs from the property. People have been walking dogs on the Rancho property for at least 25 years, probably much longer.

It will be interesting to see how this all turn out. I suspect it will wind up in court, as did your decisions on dogs at Fort Funston.

Sincerely,

Michael Madden

Correspondence ID: 3715 **Project:** 11759 **Document:** 38106
Received: May,28,2011 15:35:52
Correspondence: Web Form

e Type:

Correspondence: May 22, 2011

e:

My name is Betsy de Fries. This is my second and final follow up comment regarding the "Dog Management Plan/Environmental Impact Statement". I have lived on the edge (WUI) of the GGNRA at the trailhead of the Miwok Trail for almost 12 years. Prior to that I lived for many years at the top of Glen Drive, Mill Valley where our land bordered the parkland from Mill Valley as far as Corte Madera. In all that time I have walked unfettered with dogs on a daily basis through parklands and watersheds ? often as far as Muir and Stinson Beaches.

Having read the proposed plan at great length and attended several of the NPS Open Houses I write to oppose the GGNRA draft dog management plan. I find the NPS is once again skewing evidence and scientific fact to mislead, exaggerate, speculate and manipulate and forming conclusions that are neither based in fact nor supported by science or the law.

The GGNRA is large enough, at more than 75,000 acres, to accommodate both recreation and conservation. Originally designed as an urban recreation area and not as a pristine wilderness area, like Yosemite and many other National Parks, NPS now seeks to alter the mandate of its creation. It is worth noting that the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. The area now in contention, upon which the NPS wishes to leash dogs, is in fact less than 1% of the total acreage of the park.

This plan would disenfranchise an entire class of park visitor in favor of other classes. It disregards the health and well being of people, dogs, and the community and arbitrarily excludes Bay Area residents who exercise regularly with their canine companions, discriminating against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. Moreover the NPS is blatantly disregarding their avowed purpose to "provide a variety of visitor experiences" by ignoring the obvious needs of a large part of the visitor constituent ? those who are dog owners. They are being singled out and excluded in favor of hikers, walkers, mountain bicyclists, equestrians, bird watchers, fishermen, naturists and beachgoers.

Gross Manipulation of Existing NPS Scientific Data for Advocacy Purposes: In the same way that our State Senator Diane Feinstein finds it "troubling" that the NPS has consistently manipulated existing scientific data to achieve its end goal with regard to the oyster operation at Drakes Estero, I too find it troubling that the NPS now uses the same tactics to exaggerating the problem of dog management. Her letter to Interior Secretary Ken Salazar can be found here:

<http://1.usa.gov/mPT8qj>. Note these very disturbing quotes:

? The Frost Report details a "collective but troubling mindset" (p. 32) of misusing science for advocacy purposes. "This misconduct arose from incomplete and biased evaluation and from blurring the line between exploration and advocacy through research." (p. 35) ? The National Academy of Sciences found that the Park Service "selectively presented, over-interpreted, or misrepresented the available science on the potential impacts of the oyster mariculture operation." ? Likewise, the Office of the Inspector General concluded that the Point Reyes science advisor "misrepresented research."

There can be no doubt that the park service has cynically ignored and purposefully buried scientific studies in an attempt to foist their "preferred alternatives" onto the public and to create obfuscation at higher Government levels. The same tactics employed as above were used in this NPS report:

"Western Snowy Plover (a Federally Threatened Species) Wintering Population and Interaction with Human Activity on Ocean Beach, San Francisco, GGNRA, 1988 through 1996" by park scientist Daphne Hatch.

. The 1996 Hatch Report states: "Factors other than the number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach." . Unable to prove that dogs affect the numbers of plovers, the 1996 Hatch Report argues that dogs "disturb" plovers. In fact, in the entire year-and-a-half study, only 19 out of a total of 5,692 dogs ? less than one-third of one percent ? were observed deliberately chasing plovers, and none was reported to actually catch or harm a bird."

Further scientific studies over the past 20 years show that in reality there is - no scientific consensus that off-leash dogs have a significant impact on bird and wildlife populations. I refer to the following studies: . The 2006 Canada study, by Forrest and Cassady St. Clair. . The 1997 Colorado study by, Beckoff and Meany. . The 2007 UC Berkeley, California study, by Megan Warren.

This proven evidence is contrary to NPS assertions and refutes much of the false claims made by them. Indeed their own their own scientists can find no evidence to support the claims of bird and wildlife harassment.

The Aggregation of Evidence. The NPS is engaging in the aggregation of evidence found in one single park site - Fort Funston - and is attempting to leverage these finding as evidence prevailing in all of its 21 parks. This is to exaggerate the problems of erosion and wildlife disturbance by off-leash dogs. This "one policy fits all" is grossly unfair. All assertions made by the NPS should now be independently examined in detail for their veracity before

changes are made to the existing law.

The Gross Exaggeration of Problems with Dog Safety on the GGNRA. The NPS states an urgent need to create an overall policy to deal with dog safety issues and seeks to create a park force of additional rangers to deal with these exaggerated problems proposing to spend upwards of \$1,500,000 per annum on the staffing of such rangers whose sole purpose will be to ticket park users. Revenues from these tickets will presumably pay for salaries. This is a cynical move to create a "revenue stream" ? an underhanded tax on the people ? under the guise of providing, "a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park."

The reality of problems related to dogs is very far that stated in this plan. A more accurate study conducted by Sally Stephens, commenting at the GGNRA NR Full Committee meeting 10/27/07, produced an exact tally of the number of dog incidents comparing them with the number of people related incidents over a period from 2001 ? 2006.

I attach her significant research here. As you will find it is in total contrast to the sweeping and unfounded assertions made by the NPS:

ARE THERE SIGNIFICANT SAFETY ISSUES AROUND DOGS IN THE GGNRA? SAFETY OF THE DOGS THEMSELVES During the course of Negotiated Rule making, claims have been made that "literally hundreds of off-leash dogs have been lost, injured, or killed while roaming the [GGNRA] off-leash." (Emergency Petition to the GGNRA, p.20) These claims have been used to justify restricting off-leash access ? it is necessary for the protection of the dogs. Is this accurate?

Analysis of incident reports from 2001 to 2006 provided by the GGNRA yield the following information:

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | 6 year totals | Dogs Lost | 3 | 4 | 2 | 6 | 1 | 2 | 18 | People Lost | 57 | 57 | 68 | 65 | 63 | 63 | 373 | Dogs Injured | 2 | 1 | 0 | 1 | 1 | 0 | 5 | People Injured: Motor Vehicle | 31 | 26 | 28 | 20 | 24 | 16 | 145 | People Injured: Bicycle | 19 | 31 | 19 | 24 | 19 | 38 | 150 | People Injured: Other | 285 | 231 | 262 | 208 | 171 | 175 | 1332 | People Injured: TOTAL | 335 | 288 | 309 | 252 | 214 | 229 | 1627 | Dog Fatalities | 0 | 1 | 0 | 0 | 0 | 1 | 2 | People Fatalities | 11 | 19 | 14 | 19 | 18 | 21 | 102 | Dogs Rescued | 8 | 9 | 5 | 8 | 3 | 4 | 37 | People Rescued | 50 | 71 | 81 | 46 | 94 | 90 | 432 |
|------|------|------|------|------|------|---------------|-----------|---|---|---|---|---|---|----|-------------|----|----|----|----|----|----|-----|--------------|---|---|---|---|---|---|---|-------------------------------|----|----|----|----|----|----|-----|-------------------------|----|----|----|----|----|----|-----|-----------------------|-----|-----|-----|-----|-----|-----|------|-----------------------|-----|-----|-----|-----|-----|-----|------|----------------|---|---|---|---|---|---|---|-------------------|----|----|----|----|----|----|-----|--------------|---|---|---|---|---|---|----|----------------|----|----|----|----|----|----|-----|

The data in the incident reports indicate that there were a total of 62 incidents involving dogs over the course of the six years from 2001 to 2006. The claim of "hundreds" of incidents involving dogs in the GGNRA is, quite simply, false. When you consider that tens of thousands of dogs visit the GGNRA each day, the total number of incidents reported is miniscule (62 incidents out of nearly 22 million dog visits over the six years). The GGNRA is not an unsafe

place for off-leash dogs. Interestingly, comparing the numbers in the table between dogs and people indicates that the GGNRA is significantly more unsafe for people than for dogs. Claims have also been made that "the Bay Area's top animal behavior specialists have conducted extensive studies and shown that allowing dogs to roam off-leash is the cause of leash aggression, not the cure for it." (unpublished Letter to the Editor of the SF Chronicle, posted to a blog 10/17/07) This sounds impressive, but it too is false. At the February 8, 2007 meeting of the San Francisco Animal Control and Welfare Commission, Jean Donaldson, the founder and director of the SF/SPCA Dog Training Academy, testified on this issue. Donaldson has over 30 years experience in dog behavior and training, and is the author of several books, including *The Culture Clash*, which was voted the Best Behavior Book of 1997 from the Dog Writers Association of America and is the #1 book recommendation for dog owners from the Association of Pet Dog Trainers. At the Commission meeting, Donaldson said (a complete transcript of her statement is at the end of this issue summary):

There is not only no evidence that allowing dogs off-leash for play opportunities increases the incidence of aggression, to a person every reputable expert in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access decreases the likelihood of aggression. There is no research demonstrating that dog parks or off-leash play contributes to any kind of aggression, including dog-dog aggression. It was brought to my attention a couple of months ago, that claims were being made that such research existed. And so I did an exhaustive literature search as well as consulting at length numerous colleagues in dog behavior in the United States. All were amazed at the suggestion in view of no such research. Trish King, my counterpart at the Marin Humane Society, has been publicly quoted several times as having authored research concluding off-leash play contributes to aggression. I spoke to her at length about this and we corresponded in the last couple of weeks. She has not performed or published such research. She is furthermore, and I quote, "mortified", unquote, that anyone would suggest or imply that. She believes off-leash access, if anything, prevents aggression. Priscilla Feral, the president of Friends of Animals, often has also been quoted as opposing off-leash access. I spoke to her this past Monday regarding Friends of Animals' position, and she was adamant that statements suggesting that Friends of Animals oppose off-leash access are false. The same holds true for Kathy Santo, a nationally recognized colleague of mine. I also spoke to her this week. She followed up the conversation with me with an email, which I will now quote: "Hi Jean. I wanted to email you and clarify my stance on dogs engaging in off-leash play. I strongly believe that it is good, or more accurately necessary for healthy dogs to play off-leash in safe areas while supervised by their owners. An exercised, socialized dog is a happy and well-adjusted dog."

Clearly, there is no compelling reason concerning the safety of dogs

themselves to restrict off-leash recreation in the GGNRA.

SAFETY OF OTHER PARK VISITORS

A) DOG INCIDENTS IN THE GGNRA Those opposed to dogs in the GGNRA have often painted a picture of thousands of dogs running amok terrorizing other park visitors. But is this common or even true? An analysis of incident reports provided by the GGNRA for the years 2001 to 2006 do not support these claims:

| | | | | | | | | | | | |
|--------|--------|--------|--------|--------|--------|---------------------------------------|--------|--------|--------|--------|--------|
| 2001 | 2002 | 2003 | 2004 | 2005 | 2006 | Off-Leash Incidents | 270 | 244 | 494 | 559 | 179 |
| 111 | 63 | 77 | 80 | 79 | 63 | Off-Leash Citations | 188 | 162 | 372 | 350 | 61 |
| 15 | 17 | 17 | 17 | 17 | 17 | Closed Area Incidents | 50 | 31 | 31 | 31 | 31 |
| 23 | 29 | 21 | 24 | 24 | 23 | Closed Area Citations | 87 | 70 | 88 | 38 | 40 |
| 17 | 17 | 17 | 17 | 17 | 17 | Dog Bite Incidents | 26 | 26 | 26 | 26 | 26 |
| 1 | 0 | 0 | 0 | 0 | 4 | Dog Bite Citations | 1 | 0 | 0 | 4 | 2 |
| 3 | 5 | 2 | 6 | 0 | 2 | Lost Dog Incidents | 3 | 5 | 2 | 6 | 0 |
| 2 | 2 | 2 | 2 | 2 | 2 | Pet Litter Citations | 3 | 3 | 5 | 4 | 1 |
| 1 | 1 | 1 | 1 | 1 | 1 | Total Pet Incidents | 406 | 403 | 649 | 748 | 363 |
| 296 | 296 | 296 | 296 | 296 | 296 | Total Pet Citations | 363 | 311 | 520 | 428 | 122 |
| 42 | 42 | 42 | 42 | 42 | 42 | Total Incidents | 14,578 | 12,160 | 12,389 | 14,259 | 13,704 |
| 13,179 | 13,179 | 13,179 | 13,179 | 13,179 | 13,179 | Pet Incidents as % of Total Incidents | 2.79% | 3.31% | 5.24% | 5.25% | 2.65% |
| 2.25% | 2.25% | 2.65% | 2.25% | 2.25% | 2.25% | | | | | | |

It is clear from this table that the majority of incidents and citations involving dogs in the GGNRA are for violations of leash laws, not for dog bites or problems with other park users. Compare the number of dog incidents and citations to the total number reported during the same periods. In every year for which the reports were provided, dog incidents/citations constituted less than 5.5% (and frequently less than 3%) of the total. Dogs do not represent a major safety problem for other park visitors that would require restrictions on off-leash recreation to correct. Comments demanding absolute safety where dogs are concerned have been made. During the time the NR Committee has been meeting, a man shot and killed a hang glider at Fort Funston, and wounded another. During NR, two women were charged with luring a man to Fort Funston with the promise of sex, only to rob and kill the man once in the park. No dog has ever killed a person in the GGNRA. Unfortunately, the same cannot be said for the human visitors. What is the real threat? It should also be noted that many people, especially women and seniors, do not feel safe hiking alone in the GGNRA WITHOUT a dog. The GGNRA is adjacent to a dense urban area. Unfortunately, that means it is also adjacent to all the ills that beset that urban society. A woman was raped and killed about two years ago while walking/running in an East Bay park during her lunch hour. Many women and seniors do not feel safe walking in the GGNRA, especially its more remote areas, because people with bad intent can so easily access the park. These same women and seniors do feel safe walking in those same areas if they have either their own or other people's off-leash dogs around them. If these areas are closed to off-leash recreation, they will be effectively closed to many women and seniors who will not walk in them alone. Of course, dogs should never bother other park visitors. Proper Park Petiquette is to not let your dog approach people you do not know. Dogs should not jump on people, or take food away from them. Dog training and public education can address these problems. It is not necessary to restrict off-

leash recreation to address these issues. Note also that there has not been a single case of dog-feces borne illness in a human reported to the San Francisco Department of Public Health in over 50 years.

B) DOG BITES Concerns about dog bites are often specifically cited as a justification for restricting off-leash access in the GGNRA. Of course, a single dog bite is one bite too many. But are concerns about bites significant enough to justify restricting off-leash recreation in the GGNRA? There is no public safety crisis involving dogs in San Francisco. According to SF Animal Care and Control, about one-quarter to one-third of all households in San Francisco have at least one dog. Therefore, ACC estimates the total number of dogs in the City to be about 120,000 to 140,000. The total number of dog bites reported in San Francisco in 2004 was 384, down 20% from the number in 2003 (SFPD testimony before SF Police Commission, and private communication; this is the last year for which I have information). But ? and this is a big "but" ? San Francisco does not separate incidents where dogs bite other dogs from incidents where dogs bite people when it reports the total number of dog bites. Since the vast majority of dog bites involve one dog biting another, the number of people bitten by dogs is actually significantly lower than the total number suggests. Considering the number of dogs in San Francisco, the number of bites is extremely small. Do the math: 120,000 dogs times 365 days a year equals the potential for a minimum of 44 million bites each year. The actual number is 384 (a significant number of which are dog-dog, not dog-people bites). Reports of serious dog bites and fatal dog attacks make the news precisely because they are unusual and rare. In one of the most comprehensive analyses of injuries due to dog bites, Canadian researchers searched a national database of all reports of injuries throughout Canada in 1996 (Canadian Hospitals Injury Reporting and Prevention Program, or CHIRPP; the study can be found at: http://www.phac-aspc.gc.ca/injury-bles/chirpp/injrep-rapbles/dogbit_e.html). Dog bites represented 1% of all injuries in the CHIRPP database. The CHIRPP analysis found that children between 2 and 14 years of age sustained over 70% of all bites. Most of the dogs involved in bite incidents (65.2%) were either part of the family, part of the extended family, or part of a friend or neighbor's family. Only 12.2% were stray or unfamiliar dogs. The majority of the dog bites (64.5%) happened in someone's home (either the victim's or another person's home). Only 3.1% of dog bites (38 total) occurred in a public park. In other words, bites occurring in locations similar to the GGNRA accounted for a miniscule 0.02% (2/100th of one percent) of the total number of 188,717 injuries in the database that year. A majority (50.3%) of victims had been interacting with the dog before the bite: 19.3% were petting, handling, feeding, or walking with the dog; 17.5% were playing with the dog; 7.8% had hurt or provoked the dog; and 5.7% were disciplining the dog. The Canadian results are similar to those reported in the US. The Centers for Disease Control's MMWR weekly from July 4, 2003 says that 42% of all dog bites occurred among children under 14 years of age, and cites research that indicated that in children under 18 years old, 80% of bites

were inflicted by the family's (30%) or a neighbor's (50%) dog. Children are primarily bitten by dogs they know and not unfamiliar or stray dogs that run up to them in a park.

In testimony before the San Francisco Animal Control and Welfare Commission on February 8, 2007, Jean Donaldson, the founder and director of the SF/SPCA Dog Training Academy said:

Off-leash play has not proven to be a factor in dog bites. According to both the Centers for Disease Control and Prevention and the American Veterinarian Medical Association, the majority of bites take place on the guardians' property. The remaining incidents involve dogs that are either restrained, i.e., leashed, or dogs that are "at large", [that is,] unsupervised dogs that have escaped confinement. Consider for example, the three highest profile serious dog attacks in the history of San Francisco. Those are Diane Whipple in 2001, Sean Jones in 2001, and Nicholas Faibish in 2005. In the first, the dogs were on-leash. In the second, the dogs had escaped confinement in the backyard and were at large. And in the third, the dog was confined in the guardian's home. I would add that in all these instances, the dogs were un-neutered. Interestingly, it could very well be that the safest dogs are those that attend off-leash dog parks. Shyan and cohorts published a research paper in 2003 in the Journal of Applied Animal Welfare Science, which looked at the prevalence of inter-dog aggression in dog parks. Dog to dog problems turned out to be minimal and of a non-serious nature. While the paper did not consider the question of dog-to-human aggression, the obvious interpretation of this low incidence of aggression was interesting and I think very relevant. They suggested that self-selection operates strongly, i.e., people who take their time to get into their car or walk to a designated off-leash area to exercise their dog tend to not to be the type who are derelict in other areas of dog guardianship, such as training, socialization or appropriate containment.

As is clear from all of this, the chance of being bitten in a park by a strange dog that you have not interacted with is pretty slim. Consider where dog bites rank in the context of accidental injuries for people in general. According to the Centers for Disease Control's WISQAR (Web-based Injury Statistics Query and Reporting System, accessible at: <http://www.cdc.gov/ncipc/wisqars>; this site tracks injuries treated in hospital emergency rooms) site, the top 15 causes of accidental injury in the United States in 2006 were:

| Rank | Cause of Unintentional Injury | Number of Injuries | % of Total Injuries |
|------|---|--------------------|---------------------|
| 1 | Fall | 7,934,840 | 28.7 |
| 2 | Struck by/against object (not vehicle or machinery) | 4,663,517 | 16.9 |
| 3 | Overexertion | 3,474,597 | 12.6 |
| 4 | Occupant in Motor Vehicles | 2,723,465 | 9.8 |
| 5 | Cut/Pierce/Stab | 2,215,211 | 8.0 |
| 6 | Other Bites/Stings (not dogs) | 1,095,521 | 4.0 |
| 7 | Other | 922,208 | 3.3 |
| 8 | Poisoning | 703,702 | 2.5 |
| 9 | Unknown/Unspecified | 652,130 | 2.4 |
| 10 | Other Transport (includes horseback | | |

riding, ski lifts, golf carts, etc) 635,018 2.3 11 Foreign Body 621,433 2.2 12
Pedal Cyclist 465,395 1.7 13 Fire/Burn 417,540 1.5 14 Dog Bite 306,273 1.1
15 Machinery 278,676 1.0

Dog bites represent 1.1% of all accidental injuries. At least four of the injuries on the list are not only more common than dog bites, but could easily happen to visitors in the GGNRA ? fall, overexertion, motor vehicles, and cyclist. If off-leash access is restricted in the GGNRA to "protect" the public, then walking, hiking, all motor vehicles, hang gliding, rock climbing, and bicycling should similarly be banned. These activities combined account for 52.8% of all accidental injuries. Once again, the low frequency of dog bites, especially when compared to other more common causes of injury, indicates that bites cannot be used to justify restricting off-leash access. Fatalities from dog bites are even more rare. In 2001, the American Veterinary Medical Association published a report from its Task Force on Canine Aggression and Human-Canine Interactions titled: "A community approach to dog bite prevention," (JAVMA, Vol. 218, No. 11, June 1, 2001, p. 1733). The report states that nationally, there are about 53 million dogs (this was in 2001; there are more dogs now), and an estimated 4.5 million dog bites each year, of which about 20% (800,000) require medical attention. Note that these statistics do not mean that 10% of all dogs bite, since they don't account for repeat offenders. Note also that these numbers include medical treatment obtained at sites other than emergency rooms, which accounts for the difference in numbers between the WISQAR site and the JAVMA article. NOTE: The JAVMA report states: "although most dog bites occur on the property where the dog lives, unrestrained or free roaming dogs do pose a substantial threat to the public." In this context, "unrestrained or free roaming dogs" does not mean off-leash dogs supervised by a person. "Unrestrained or free roaming dogs" means stray dogs that have no person supervising them. Out of the millions of bites, about 10-20 are fatal each year, roughly 0.0003% (three-ten-thousandth of one percent) of the total number of bites. That number has remained nearly constant for decades, despite significant increases in both the numbers of people and the numbers of dogs. About 70% of those killed by dogs each year are children under the age of 12 (a total of 7 to 14 deaths a year). Of course, even one bite is one too many, and any fatal dog attack is devastating for families and friends of the victims. But what is the context for these numbers? Do dog bites pose a significant risk of death to children? To get a sense of the context, compare the number of children killed by dogs with the number of children who died from other causes. Sadly, over 1000 - 2000 children die each year as a result of abuse, most at the hands of their parents or primary caregivers. ("Primary Prevention of Child Abuse", Lesa Bethea, American Family Physician, March 15, 1999, vol 59, no 6) The SAFE KIDS USA Campaign (formerly the National SAFE KIDS Campaign) is dedicated to preventing accidental deaths of children. Their website (<http://www.safekids.org>) provides information on the causes of unintentional death and injury for children under the age of 14. Dog bites are not even mentioned. According to

the SAFE KIDS website, in the year 2002, some of the causes of accidental death in children were: ? 1,638 from motor vehicle crashes ? 838 from drowning ? 599 from pedestrian injuries ? 520 from fire and burn-related injuries ? 130 from bicycle-related crashes ? 95 from falls ? 100 from poisonings ? 60 from firearm-related injuries ? 147 from playground equipment-related injuries (between 1990 and 2001) ? 89 from inline skating injuries (since 1992) ? 120 from ATV-related injuries (in 2005) ? 20 from school bus-related injuries (in 2003)

http://www.usa.safekids.org/tier3_cd_2c.cfm?content_item_id=19010&folder_id=540 When the numbers above are compared to the number of children killed by dogs, it is clear that dogs do not pose any significant risk to children.

Putting this all together, there is no compelling reason associated with dog bites to restrict off-leash recreation in the GGNRA.

Therefore it can be concluded that well-exercised dog is a well-behaved dog. Dog owners carry the responsibility for the actions of their dog. There is no evidence that allowing dogs off-leash for play opportunities increases the incidence of aggression, to a person. Every reputable expert in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access decreases the likelihood of aggression.

Unbiased Reporting. It is essential that you take the time to read and consider these independent studies, since it can be inferred from their findings that the NPS is intent only on the advocacy of their own agenda and cannot therefore be trusted to produce a fair and unbiased plan. This plan will affect so many of the lives of people in the Bay Area enjoying the GGNRA for the purpose in which it was established.

Park Service should revise the dog management plan in the following ways: . Honor the original 1979 Pet Policy. . Respect dog-walking as a legitimate recreation. . Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in Marin County. . Exclude speculative, exaggerated, biased, or misleading statements and studies. . Provide reasonable ways to address any significant adverse impacts from recreational activities. . Use objective standards applicable to other recreational activities like equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers etc., . Eliminate "compliance-based management," which allows for additional restrictions to be implemented without any public input.

Fiscal Responsibility and Accountability. It is reprehensible that the NPS should spend so much money, time and energy on this plan when they say they cannot provide staff to maintain existing parkland and adequately finance fire management and prevention. I speak from experience in trying to get park

personnel to remove trees and debris that fall from the park on to our property.

In Conclusion: The park is a national treasure and the GGNRA draft management plan does not provide enough unbiased evidence to justify such drastic changes to 40 years of healthy dog and human recreation to the detriment of all. Policing the GGNRA would create a very negative atmosphere. However, educating people and make them feel a part of and responsible for the well being of the GGNRA is a much better policy one of which I could support spending good tax paying on.

Sincerely,

Betsy de Fries Mill Valley CA 94941

Correspondence ID: 3716 **Project:** 11759 **Document:** 38106

Received: May,28,2011 00:00:00

Correspondence Type: Web Form

Correspondence: --The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3717 **Project:** 11759 **Document:** 38106

Received: May,28,2011 15:39:17

Correspondence Type: Web Form

Correspondence: I am a regular user of both the Marin Headlands and Crissy Field. I support stricter rules concerning dogs in the parks for both environmental reasons and out of respect for other users. Many dog owners think that having their dog nose another person or jump on them is cute and friendly. As a person

who was attacked by a dog as a child I find off leash dogs to be a nuisance at best and sometimes frightening. For the vast majority of dogs 'voice control' is a joke. I support keeping our parks safe and clean for everyone including wildlife. Dogs running free are not part of this equation.

Correspondence ID: 3718 **Project:** 11759 **Document:** 38106

Received: May,28,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: -Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. -Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. -Exclude speculative, exaggerated, biased, or misleading statements and studies. - Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). -Enable professional dog walking and align any professional dog walking rules with county or city regulations. -Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely, Lisa Kucukdogerli

Correspondence ID: 3719 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/28/11

To Whom It May Concern:

Golden Gate National Recreation Area may be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. Indeed, the park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined!

To help protect these species and other protected wildlife, inappropriate activities such as motor vehicle use on beaches were banned. However, the park continues to permit unregulated activities that disturb wildlife like western snowy plovers and marine mammals. Wildlife take refuge on Golden Gate's beaches to rest, breed, and rebuild energy for survival, yet unregulated off-leash dog recreation in these areas has resulted in habitat encroachment and wildlife harassment by dogs. For example, the park has reported that unleashed dogs represent the most significant recreational threat to wintering western snowy plovers.

I am writing to urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

I feel that endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Also, the park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

I feel the park should require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs and limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. I think alternative D best reflects the national park values.

Thank you for listening to these comments, which are intended to be helping

to create a better park experience at Golden Gate National Recreation Area, and giving imperiled species a chance to survive.

Sincerely, Serena C. Wittkopp, B.A. Graduate of Arts and Letters

Correspondence ID: 3720 **Project:** 11759 **Document:** 38106

Received: May,28,2011 16:41:38

Correspondence Type: Web Form

Correspondence: I understand that you want to limit the use of the GGNRA from dogs and I disagree.

You are located in San Francisco, a densely populated area. The dogs and the humans need to be able to utilize the space that is available. There are plenty of areas in California and in the Bay Area, where habitat and species are protected. San Francisco, the 2nd most densely populated city in the nation should not be one of them. Dogs have a therapeutic value to humans and they need space and place to be dogs. Humans need to be able to recreate with their canine companions. It is a symbiotic relationship. Dogs need to be able to run and romp and play because that is their nature. This area has been available for years and ought to continue to be so. I am a 62 year old San Francisco native. Roberta Coleman

Correspondence ID: 3721 **Project:** 11759 **Document:** 38106

Received: May,28,2011 17:01:20

Correspondence Type: Web Form

Correspondence: This document is flawed as to scope and to how it avoids addressing laws and factors passed after NEPA went into effect. SO, this document at least needs a supplement or revision, if not a substantial re-do.

NOWHERE is there any mention of or concern for a specific animal grouping-- guide dogs and service dogs. Nor is there any reference to protecting vulnerable HUMAN populations.

Yet, Guide Dogs for the Blind has been in San Rafael, CA, since the 1942--LONG before NEPA was passed and long before the establishment of the GGNRA. Worse, in the files of GGNRA is a 2005 letter from Guide Dogs for the Blind, wherein their field service manager cites a 2003 survey indicating that:

89% of their graduates [EIGHTY-NINE PER CENT] "have had Guide Dogs interfered with by off-leash dogs"; and further that

42% of their graduates [FORTY-TWO PER CENT] " have had their Guide Dogs ATTACKED [[emphasis mine]] by off-leash dogs".

When a person using A Guide Dog loses those services, it can take up to two years and cost \$50,000, or more, to get a new Guide Dog. During that interim training period, the mobility of that person whose guide dog was incapacitated is greatly limited.

If, contrary to existing policy elsewhere within the NPS system GGNRA allows off-leash dogs, then GGNRA can be viewed as liable for injuries to the Guide Dog, to the person, and to training and replacement costs.

By the silence of this document on the hazards of off-leash dogs, readers are allowed to assume that off-leash dogs present no discernible hazard or risk to anyone. This also means there is an unprofessional hiding of the facts, making GGNRA possibly culpable for triple damages in any civil lawsuit.

So, failure to have a plan that properly addresses the needs of those dogs [Guide Dogs] as well as of "service animals" is negligent and non-responsive, as to a comprehensive response to and plan for ALL animals, and not just "off-leash" dogs.

Once the neglect of safety of Guide Dogs from attack by off-leash dogs is raised, that raises the larger issue of how safety of ALL people is also not addressed,

Since there already is evidence that off-leash dogs DO attack Guide Dogs, that means it likely the person using a Guide Dog also is entangled or engulfed in the attacks of off-leash dogs on Guide Dogs. Protection of that user of a Guide Dog's services also is not addressed. Since Guide Dogs are attacked, the larger issue of safety for vulnerable populations also is not addressed. Not only do people using guide dogs have a greater vulnerability, but so do many people with mobility impairments, toddlers, pre-schoolers, adults pushing a baby in a stroller, a group of primary grade children out on a field trip and some seniors.

Members of all those groups have slower speed, reaction time, and mobility options than those who wrote this document and than those likely to be monitoring and / or enforcing any off-leash regulations.

Which also shows how narrow is the experiential thinking that produced this narrow-focus document that deals only with:

off-leash dogs, and endangered flora and fauna, but not with Guide Dogs, Service Animals, and the people who rely on them.

By considering a deviation from NPS standards, GGNRA is opening up the entire system to a crazy-quilt of possible local options, which will be unknown to visitors from outside that area. Despite disclaimers to the contrary, any deviations from national NPS standards that GGNRA authorizes will be used by others, elsewhere, for their "local rules".

Even allowing consideration of off-leash dogs also lessens the importance of native and entrenched flora and fauna.

This document's neglect of addressing the safety needs of vulnerable populations ASSUMEs all visitors to / users of GGNRA facilities are all fully able-bodied, agile, mobile, and possessed of all their cognitive faculties.

Somehow, the writers of this document got stuck somewhere in the early 1960s, ignoring the passage of the Older Americans Act in 1965 and the passage of the Americans with Disabilities Act [A.D.A. in 1990.

Since the 1965 Older Americans Act was in effect when NEPA was passed in 1969, there should be no professional excuse for ignoring the impacts of that 1965 law on a 1969 law.

Further, with passage of the civil right law known as the A.D.A., people with disabilities are, supposedly, guaranteed a right to all programs and services a government agency provides.

If GGNRA allows off-leash dogs anywhere, that will effectively block some people with disabilities from also going into those areas.

Somehow, GGNRA wants to subordinate a national civil rights law to a local standard of allowing off-leash dogs to have designated areas. GGNRA does not have the authority to contravene, overrule, undermine, or evade a federal statute.

By all that this document neglects to address, GGNRA cannot fairly and prudently consider any areas for off-leash dogs. This document needs to be rejected and re-done.

Correspondence ID: 3722 **Project:** 11759 **Document:** 38106
Received: May,28,2011 17:12:25
Correspondence Type: Web Form
Correspondence: Saturday May 28

Dear Superintendent Dean,

Below are the comments I hand-delivered to your office at Fort Mason yesterday at 2 p.m. I've had other thoughts about the DEIS and specifically Fort Funston which I'd like to add.

In the many hours I've spent with our dog Penny at Fort Fun, rain, shine, wind, cold, the most consistent presence has been dogs and their people -- I, a senior woman with my dog, have always felt safe and that if I took a fall or there was any kind of emergency, someone would help me. Also, I have never seen a homeless encampment or a feral cat there, in large part, I believe, because of the presence of dogs and their people (although I had an interesting conversation with a woman who takes her dogs there at 6:30 a.m. and laughed when she told me her dog had interrupted a man defecating in the bushes by the hang-glider overlook). Before the Park Service destroys this precious and possibly unique dog/human community I think more evidence is needed that it's an inappropriate use of GGNRA resources. Sincerely, Judith D. Kucera

May 26, 2011 San Francisco 94112

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

Re: Draft Dog Management Plan/DEIS

Dear Superintendent Dean,

My husband (64) and I (67) have owned our small (lot is 25 x 100 ft.) home in the Glen Park/Bernal neighborhood of SF for 30+ years. 2 years ago we adopted a rescue dog for companionship and exercise. Because of our ages we initially looked for an older dog, but fell in love with Penny (now 3, a 60 lb. Chow/Shepherd mix, see pix) at the SPCA pet fair and embarked on a new, demanding and immensely satisfying relationship.

Over the past two years we've spent countless hours exploring San Francisco with Penny, but our favorite spot has been Fort Funston because of the dog-friendly environment where we can go for long walks together and she can socialize with other dogs and humans off-leash. Twice a week she goes there in a play group with a dog-walker (I quite often tag along because it's so much fun watching them play together ? Penny's best friend is a year-old Weimie she's known since he was 2 months old), and 2 - 3 times a week she goes there with Mark or me; other days we go to city parks for her daily 2 mile walk. For a year and a half we went to A Better Way for Dogs and learned voice control and how to work with her on and off leash,

and we've worked hard to be responsible dog-owners. As long-time environmentalists (I'm a Sierra Club member) we also try to be responsible stewards of the natural world (we used to go to Ocean Beach to do clean-up in the '80's ? young people thought we were weird!), so we keep a close eye on her when we're out there, and have worked hard to exercise voice control when she's off-leash.

I've attended 2 NPS meetings as well as the SF Supervisors meeting to learn about the Draft Proposals for the GGNRA and have been utterly dismayed at the extreme reductions in on/off-leash recreation outlined for dogs and their guardians. After studying the Fort Funston ROLA proposals it seems clear that no dog behaviorists were included as DEIS advisors, because neither the on or off-leash areas have any shade!!! Also, as a senior, I'd risk injury trying to get Penny to the beach (which as you know is often unusable because of high tides or bad weather) on-leash, and because the trails would be crowded Penny would be anxious, esp. on-leash, and more likely to be aggressive (evinced possible "leash rage"). The ROLA proposed next to the parking lot is completely inadequate for the number of dogs using Fort Fun and is an invitation to non-compliance which under the current proposal would eventually result in dogs being banned entirely.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents, or to evaluate the impact on local parks of such a drastic change in existing policies..

The recent brochure I got in the mail from the Golden Gate Conservancy was headed "Parks for all Forever" ? unfortunately as dog-owners we feel excluded from this generous vision by the DEIS. Having read quite a bit about NPS dog policies, it seems clear that our dog, and therefore we, are not welcome in the national park system, with very few exceptions, most of them a thousand or more miles away. Obviously there are areas where dogs shouldn't go, for endangered species preservation or their own well-being. However, in general, we don't understand why the policy doesn't allow leashed dogs wherever humans are allowed, and why there are not many more ROLAs in the NPS as a whole. Since some 15% of Americans own dogs, it does not seem unreasonable that 1% of Parklands would be set aside to allow access for them too, and to this end we think:

- 1) The National Park Service should treat the GGNRA as a model for developing more enlightened dog policies throughout the park system, which could be co-ordinated with the "Let's Move" efforts which our First

Lady Michelle Obama is so actively involved in, encouraging families to get outside with their dogs, educating them about dog behavior, and providing room for off-leash recreation (you can't play catch when your dog is leashed!)..

2) Hire dog behaviorists to improve the existing models Fort Funston, Crissy Field and other important GGNRA dog recreation areas including the New Lands. Point Isabel Regional Shoreline is a sophisticated model of multi-recreational use which could be drawn upon and then used throughout the park system. Consider experimenting with a "green" approach to dog waste, providing compost stations like those coming into use in Canada, or biodegradable bags which could then be composted instead of going to landfills.

3) Signage and fencing or other barriers for areas closed to the public and/or dogs should be abundant and educative.

4) Remove the "poison pill" plan with regard to compliance.

5) Require all dogs using the GGNRA to display a current license together with contact information in case of emergency and to be under voice control when off-leash.

6) Set up a low-cost automated permit system for dogs (\$1 - \$2 a day per dog) which will help defray any extra maintenance costs.

7) At Ocean Beach either: retain and expand existing snowy plover protections to include human disruption as well as heavy equipment, kite flying, beach fires and other known factors affecting the bird population. Where feasible create plover-friendly areas including oyster shells for cover. Or, recognize that Ocean Beach may never become a nesting area because of the heavy human presence there. Is it true that only 7 plovers have been sighted in the annual counts since the dog ban was instituted? Maybe GGNRA plover restoration efforts should be concentrated elsewhere instead of closing off 2 = miles of a beach much needed for human recreation, with dogs welcome on-leash and off in a larger designated ROLA..

After much thought, I support Alternative A, the No Action alternative, and retaining the existing 1979 policy with changes as outlined above. It's especially important that the New Lands policy be changed to include respect for existing uses of the lands including on and off-leash dog-walking. I see many dog-walkers at Fort Funston who drive up from San Mateo County because there are so few off-leash areas there, and the New Lands proposal would exacerbate this situation. State and county parks in San Mateo have extremely restrictive dog policies ? perhaps an enlightened NPS policy would have a trickle-down effect in this regard. It's important to

remember that dogs have important well-documented roles to play in providing companionship, exercise and protection (I feel much safer hiking now that I have a dog) for their humans.

Other changes we would support:

Pit-bulls (and other breeds specified in local ordinances) must be neutered or on-leash.

Owners/walkers must have a leash for each dog and a bag for feces pickup.

Dogs may be off-leash during daylight hours only

Dog caregivers must leash excitable dogs within 50' (? not sure how far) of horses, hang-gliders, and other stimuli known by the owner to cause prolonged barking or aggression. When sharing paths with young children and bicyclists, owners must leash their dog and/or withdraw a safe distance to reduce other users anxieties. Owners are expected to act as good-will-toward-dogs-ambassadors, recognizing that many people have a high level of anxiety about dogs. Inappropriate or aggressive behaviors which caregivers don't take immediate steps to control should be reported and may result in the dog and its caregiver losing access privileges. Those reporting such behavior can call a hotline and give an incident report describing the dog, its care-giver, time/place and vehicle license number if known, as well as a brief description of the problem. If urgent they should call 911.

No off-leash dogs in or within 25' of parking lots.

We hope that you and the Park Service can find ways to reconcile the many conflicting interests surrounding this issue, and develop a more humane and sensible approach to the problem which will continue to welcome us and our dog in the GGNRA.

Sincerely, Judith D. Kucera and Mark Hein

cc The Honorable Nancy Pelosi, Secretary Ken Salazar, Mr. Jon Jarvis, NPS Director

Correspondence ID: 3723 **Project:** 11759 **Document:** 38106
Received: May,28,2011 17:32:12
Correspondence Type: Web Form
Correspondence: Commenting on dog rules for the park:

Remember the often negative experience of dog NOISE in the park.

Correspondence ID: 3724 **Project:** 11759 **Document:** 38106

Received: May,28,2011 18:49:50
Correspondence Type: Web Form
Correspondence: Please don't pass the more restrictive dog policy. It is a terrible idea.

Correspondence ID: 3725 **Project:** 11759 **Document:** 38106

ID:

Received: May,28,2011 18:51:38

Correspondence Type: Web Form

Type:

Correspondence: Why We Don't Trust You

In the DEIS, "A substudy of the San Francisco Sewage Master Plan determined that bacterial contamination of the water off Ocean Beach was significant due to dog fecal matter deposited along the shoreline. (NPs, 1999)" (DEIS, p 228, para.5)

See, this is just one example of why we don't trust you, GGNRA. Why would you include this statement in your DEIS when you know this "substudy" was impossible to track down? During Negotiate Rulemaking in 2007, NPS admitted neither they nor the SF PUC Water Quality Bureau could find it, yet here in 2011 you made this claim sound like it came from a real document. And this is your basis for the accusation that dogs contaminate the water starting with the Executive Summary.

You actually had real data to draw from regarding water quality at Ocean Beach and elsewhere. The SFPUC website has information available to the public. The reason you didn't is THERE IS NO PROOF DOGS ARE CONTAMINATING THE WATER. To the contrary, there is evidence fecal contamination doesn't exist there at all. The SFPUC monitoring San Francisco beaches showed off-leash beaches do not have higher bacterial contamination than beaches where dogs are prohibited.

On May 26, 2011, a front-page story in the San Francisco Chronicle was entitled, "Where Not to Go in the Water at Bay Beaches." The environmental group Heal the Bay annually rates the Bay Area Beaches, among others, and concluded, " Ten Bay Area beach locations received perfect scores and were named to the groups' honor roll, including Ocean Beach at both Balboa Ave. and Sloat Blvd., Crown Memorial St. Beach in Alameda, Montara State Beach, Surfers Beach, and six others in San Mateo County." (p.1,12)

So go ahead, GGNRA. Keep making stuff up and spreading it around. We'll see what Nancy Pelosi and Diane Feinstein have to say about this. We will never stop fighting for our rights.

Correspondence ID: 3726 **Project:** 11759 **Document:** 38106

ID:

Received: May,28,2011 19:16:59

Correspondence Web Form

Type:

Correspondence: I am writing to oppose the GGNRA draft dog management plan alternatives that further restrict or ban dogs in open spaces. There are 4 parks I specifically want to address:

1) Mori Point in Pacifica. The work GGNRA has been doing in this park has been fabulous. Though you've cut out some of the trails we used to walk on, what you've done has made the park more accessible to more people (instead of my secret almost private place, which I do admittedly miss). However, the plans to close off upper Mori Trail and Lishumash trail are ill-advised. These trails provide a more rugged experience that dogs and owners need, move us away from people with little kids and strollers, and give people more exercise and dogs more places to sniff, without harming the vegetation or affecting wildlife. Your draft plan also cuts off all access to the Headlands, which is odd and unfair. It prevents us from the longer walks along the cliffs heading south, and from meeting up with the trail that leads to the Quarry, both popular and beautiful walks. Furthermore, the plan to close off the trail that leads north from lower Mori Road just before we reach the new ponds (this path fronts backyards), will cut off easy access from the entire neighborhood. I meet many elderly people, people in wheelchairs or with canes, and people with young kids who enter the park through this trail. Closing it off will cause all the people who live there to either have a much longer walk to the main entrance by the Moose Lodge, or they will have to drive there, increasing parking congestion amid much more inconvenience.

2.) Milagra Ridge in Pacifica. This is a wonderful space that is lightly utilized (some of the time I'm there alone with my dogs). The heaviest users are people with dogs, and everyone I've seen with just a couple of exceptions respects the on leash requirements here. We like to walk along the dirt trails as well as the paved ones, for the variety, for the exercise, and for the views. I've never heard of any negative encounters between dogs and wildlife (the one time we saw a deer I held my dogs close and there was no interaction). Closing off any of it to dogs on leash is unfair and unnecessary to protect this park. Dogs have been using it for many many years with no ill effects to either wildlife, vegetation or other users, and I strongly urge you to continue the current policies of on leash dog access.

3.) Sweeney Ridge (Pacifica and San Bruno). This park has steep trails that provide intense exercise and reward us with spectacular views. We need this place and our dogs need this place. Dogs have been using these trails for many many years and there is no compelling reason to destroy what has

been a workable and successful human/dog experience.

4.) Ft Funstan. Alternative A, leaving the area open to off leash dogs as it has been for 50 years, is by far the best option. It benefits the dogs, the owners, and the rest of the GGNRA by allowing one place where it is legal to run the dogs. All other parks have severe restrictions or prohibit off leash dogs, and it is reasonable for Park Service to recognize that this place is different and deserves to be treated differently than all the rest of NPS territory. Besides recognizing the force of tradition, this would demonstrate that the Park Service recognizes that a unique area deserves unique consideration for the needs and expectations of the population which uses it and contributes people power to its upkeep.

In my discussions with Park Service Rangers, I kept hearing that no other parks in NPS allow dogs at all, and therefore GGNRA should conform to those restrictions. I think this reasoning misses the point. GGNRA is not Yosemite, or Glacier, or Yellowstone, or Zion. It is an urban park, surrounded by populations who have been used to considering and using these areas as part of the neighborhood. An urban park serves an urban population, which contains dogs as valued members of the community.

I hope you will take very seriously the needs of the people who use these parks and want them to remain dog accessible. The Park Service needs the support of the population in order to successfully manage these areas, and the people need your support to make these parks meet our needs.

Thank you, Shelley Levine

Correspondence ID: 3727 **Project:** 11759 **Document:** 38106

Received: May,28,2011 19:27:11

Correspondence Type: Web Form

Correspondence: I have been a resident of the Marina District in San Francisco since 1997, and my company has our office on the Main Post of the Presidio. As a result, I spend a considerable amount of time in the Presidio and around Crissy Field. I am a runner and a biker and use a lot of the trails/open space in the Presidio.

I am not a dog owner, but wanted to say that in all my time spent in the Presidio, I have never encountered any trouble with any off leash dog or even seen any issues. The dogs and their owners are very much a part of the landscape of the Presidio, and I strongly disagree with any attempt to place additional restrictions on the amount of space available for dogs.

There is no need to change the current plan, and if for some reason the plan

is changed, the current proposals are much too restrictive and not in keeping with the open space use that best serves the community.

Correspondence ID: 3728 **Project:** 11759 **Document:** 38106
Received: May,28,2011 19:34:03
Correspondence Type: Web Form
Correspondence: May 28, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022 Re: Draft Dog
Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I have been a resident of San Francisco since 1977. I have lived next to the Presidio for all of my time here and have been very impressed with the Park Service's transformation of the Presidio from an army base into a National Park. I am an active environmentalist and am a member of the Golden Gate Parks Conservancy - William Kent member, the Sierra Club, and the NRDC.

I believe that the GGNRA is an absolute jewel of a resource and is generally well run. I believe that the Presidio and the rest of the GGNRA should be managed, however, as urban parks and that their management should be guided by a set of principles tailored for urban parks rather than the principles that guide the remote wilder lands that comprise the bulk of the National Park system.

One of the unique opportunities for the Park Service with an urban location like the Presidio is to introduce urban dwellers to the out-of-doors and management policies should be creative and inviting. Urban dwellers are drawn to the Presidio to walk their dogs and become enchanted with the beauty of its natural setting. Restricting dog walking will reduce the number of citizens who experience the out-of-doors...precisely what I would think the Park Service would not want to do.

I am a dog owner and have been so for fourteen years. I walk with my dog in the Presidio daily, on trails near my home and often along Crissy Field out to Fort Point. I also hike with my dog in those areas of the Marin Headlands that permit dog walking. Of course I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas. However, I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The

proposed changes to the existing conditions (1979 Pet Policy) are not based upon sound science or long-term monitoring of site-specific conditions.

As presented in the DEIS, the proposed dog management plan eliminates dog-walking (on and off leash) access for all new lands (additions to the GGNRA sometime in the future). The GGNRA's mission applies equally to new lands as existing lands; it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands as well as for existing.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it is not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

In all my time at Crissy Field, I have seen very few incidents of dogs going beyond the fences that enclose the dunes or the marsh, and even fewer incidents of dog aggression. I have never seen a dog be aggressive to an adult or a child. With the many dogs that are there on weekdays, and the hundreds that are there on weekends, I think that is quite remarkable, and certainly does not justify the restrictions being put forth in the GGNRA's preferred alternative.

Many people have worked diligently both together and separately to study the DEIS and to make thoughtful comments on its findings, in hopes of encouraging the National Park Service to rethink and more carefully document its stance. The outcome of this plan will have an important effect on the quality of life for everyone in the Bay Area. I urge you to support Alternative A with individual consideration for any new lands, for the sake of the health and recreation not only of thousands of Bay Area residents and their canine companions, but for everyone who enjoys the GGNRA.

Sincerely,

Kathryn Nyrop San Francisco, CA 94123

CC: Representative Nancy Pelosi Senator Dianne Feinstein Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director District 1 Supervisor Eric Mar District 2 Supervisor Mark Farrell District 3 Supervisor David Chiu District 4 Supervisor Carmen Chu District 5 Ross Mirkarimi District 6 Supervisor Jane Kim District 7 Supervisor Sean Elsbernd District

Correspondence ID: 3729 **Project:** 11759 **Document:** 38106

Received: May,28,2011 19:36:17

Correspondence Type: Web Form

Correspondence: This letter is asking for your support in allowing continued access for dogs in the Rancho Corral de Tierra, soon to be part of the GGNRA. This large property is close to my home in Montara.

I am a small animal veterinarian and I have been hiking with my dogs in the local open space area for the last 15 years. This is something I do daily-and without it my quality of life would be compromised. Daily walks with my two well behaved dogs is the highlight of my day. I am a member of the Montara Dog Group as well as the Sierra Club. In addition to walking our dogs, I often bike ride or ride my horse in this same open space. You can consider me a heavy user of this wonderful resource-and I want to emphasize how well dog walkers, horseback riders, cyclists, and hikers get along and respect each other. The Montara Dog Group has encouraged responsible dog walking by starting a volunteer organization of people who remove dog waste from the mountain and by promoting leash protocols that respect all users in the park.

I encourage you to adopt Alternative E from the GGNRA Draft Dog Management Plan. This will allow continued on leash dog walking with off leash to be considered if certain criteria in the plan are met. The proposed Alternative prohibits dogs from an area where people have been walking them for 50 years. This is unacceptable.

The reasons I want Alternative E are:

This is a very small percentage of GGNRA, yet a huge part of life in Montara. In fact, one of the reasons we moved here from southern California was precisely due to the opportunity to walk our dogs in an open space.

Dogs do not harm the open space. [The Peninsula Humane Society Wildlife Expert supports this comment. There is no evidence collected by GGNRA to dispute it.]

GGNRA is a RECREATION area, and walking dogs is a very popular form of recreation.

There is a lot of room in the Corral--and all users should be considered.

Many trails afford opportunities for dogs, horses, bicycles and hikers to enjoy this open space area.

As you proceed with revising and modifying the dog plan, please select an option that includes dogs. There are two important thoughts that I want to express:

1. Dogs have been walked in this area for 50 years, and there is no documented evidence of harm. This activity benefits many local users, and it is vital that we be allowed to continue this activity.

2. I am concerned about the "Compliance Based Management" system and would like more specific guidelines about dog walking. For example, if a dog is off leash and not doing harm, would this cause the rules to revert to the next stringent level? Is there any community input allowed on this? Who would enforce Compliance Based Management.

I hope you plan to allow dogs based on site specific information for the Rancho. I would also like to see the rules depend on documentation of actual effects of dogs on the Rancho. I do not want dogs to cause any harm, nor do I want to see them restricted without good reason.

Thank you for taking the time to read and consider my comments.

Lisa

Correspondence ID: 3730 **Project:** 11759 **Document:** 38106

Received: May,28,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Recreation should not be allowed to undermine the park's mission to protect natural and cultural resources. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve (and require) a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--To better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, more than one trail and more beach areas free from dog recreation are needed.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you

Correspondence ID: 3731 **Project:** 11759 **Document:** 38106
Received: May,28,2011 19:58:55
Correspondence Type: Web Form
Correspondence: I am a 68 year old woman who values the off-leash areas to walk my young dog. I go to Fort Funston and Crissy Field at least 4 times a week and enjoy meeting and visiting with other dog walkers as much as my dog enjoys playing with various and sundry dogs along the way. If those dogs were on leash this simply would not happen Dogs on leash often become very protective and aggressive towards other dogs and strangers. I can still manage the stairs to go down to the beach at Fort Funston, but that will not always be the case so I hope you will reconsider your plan to make all of the trails on the upper area off limits to off leash dogs. I believe that these areas should be an example of how sociable dogs can be when allowed to run off leash. I have walked my dogs in these areas since 1994 and have observed only 2 occasions that dogs were out of control and needed to be constrained. Those 2 occasions both involved dogs that were not neutered. I would suggest that efforts be made to enforce laws that I believe already are on the books, such as restricting the number of dogs that dog walkers can walk at one time and insisting that dogs be neutered or spayed. I have volunteered at Wildcare in San Rafael so I do have an awareness of the impact people and their pets have on our native wildlife. I do not believe that the proposed changes to existing conditions set by the 1979 Pet Policy will improve our impact on the natural surroundings. In order to achieve that we would all have to be barred from these areas and that includes hang gliders, hikers, horseback riders and bicycle riders. We are in an urban environment and that simply isn't reasonable or rational. Please put your energies and money elsewhere.

Correspondence ID: 3732 **Project:** 11759 **Document:** 38106
Received: May,28,2011 20:42:52
Correspondence Type: Web Form
Correspondence: 12 aprile 2011 (28 maggio 2011 PM PACIFIC posted to ggnra in protest of their taking away leash free 1% of golden gate national recreation area to dogs)

dear mayor lee and san francisco supervisors (and ggnra "officials" literally

hiding out at nps.gov),

greetings! it is with extreme urgency that i write you tonight because i personally cannot afford to take off work and visit with each of you in person as i would have preferred to do, you see i have to work very hard every day just to stay in san francisco, my home of choice since 1986, and i understand that you all are coming to decisions and actions on the golden gate national recreation area's (ggnra's) sudden proposed anti-dog issues in and around the city and county of san francisco, and as my direct employees in my hometown and county i must give you my explicit directions: i am PRO maintaining and growing leash-free areas in and around the city and county of san francisco and i expect you to be also as well as for you to advocate for the same.

as way of quick background: people have walked with their dogs off-leash on the coastal lands of the san francisco bay area for centuries. the ggnra was created in 1972 to "provide for the maintenance of needed recreational open space" for the people of the bay area. congress stated the purpose of ggnra's creation was to "assure the preservation of open space . . . to provide public access along the waterfront, and to expand to the maximum extent possible the outdoor recreation opportunities available to the region."
(reference <http://www.sfdog.org/>)

and to share with you only some of my own qualifications, i rescued-adopted a two-year old adult dog in 2006 from milo foundation, who is my own personal california assistance dog, who lost her leg to a fungal infection in january 2009, having had two heart surgeries and a year-plus-long vascular port commencing in 2008, yes i could have bought and owned a home outright in most ANY where in the usa during the bush & co era with the moneys i personally helped pump into the LOCAL economy saving her life, not to mention nor forget the help i and she received from her team of friends and family. the fungal infection was something undetected and manifested itself only post her 2006 adoption and specifically in july 2008. as a three-legged strong and healthy dog now, her having quality leash-free areas within and around the city and county of san francisco is vital for her ongoing good health and maintenance requirements.

when the federal government including and specifically bush & co was creating the HUGE mess that we are all in now, i was helping to spend LOTS of money in the LOCAL economy, the dog health economy, as were my friends, and as a side benefit i helped maintain the health and well-being of san francisco and the state of california. indeed, i qualify as one of the many people with dogs who often refer to the surrounding ggnra areas as "heaven on earth" and i with my friends and family will continue to fight to keep the bay area's "backyard" open to all.

now i need you to step up to bat for me and mine: vote PRO maintaining and growing leash-free areas in and around my home, the city and county of san francisco, california. thank you for your immediate consideration, time, and more importantly, for your immediate actions taken on my, my family, and my friends' benefit in maintaining leash-free in full and intact throughout san francisco.

yours only with equality in the streets,

richard lynch

daily cyclist, sfbc member, sfdog member, walksf member, local artist, resident of jane kim's district, and sf resident since 1986

"The bicycle is more than a sport and a means of transportation, it is a social benefit." -- Pierre Giffard, 1899, Le Velo (translation by Graeme Fife)

My job search web site is: This is a Flash site with a key at bottom. My resume only is at:

Thanks and talk soon!

| | | | |
|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 3733 | Project: 11759 | Document: 38106 |
| Received: | May,28,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | May 28, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am a resident of San Francisco and a homeowner in District 11. I have walked the beautiful trails at Fort Funston with my dogs since 1992, nineteen years. In fact even though I lived in San Francisco since 1975, I had never frequented the Fort Funston until I rescued my first San Francisco SPCA dog. I take my dogs to Fort Funston every single Saturday and Sunday. I am 59 years old and walk with many of my friends and their dogs. These friends are between the ages of 55-70 years of age. We are either already Senior citizens or quickly on our way to becoming AARP members. We are not afraid to use the GGNRA because of off leash dogs. We love our dogs they are members of our families. In fact research shows that individuals who own dogs experience better health as a result of exercising their dogs. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. The Preferred Alternative is not acceptable. It is overly | | |

restrictive, and its restrictions are not justified by the totality of available data. It is based on separation and exclusion, a management philosophy that goes against the values of the Bay Area in which it is fully immersed. It violates the mandate for the "maintenance of needed recreational open space" contained in the legislation that created the GGNRA. The DEIS presents very little evidence of the impacts dogs actually have. The DEIS instead makes assumptions about what could happen.

I have been very politically active in San Francisco for two decades. In addition to the many issues I have fought for ? economic equity for women, more humane approaches to working with juvenile offenders, saving the environment by reducing our carbon footprint ? I have been active in preserving off leash dog walking in our San Francisco parks as well as the GGNRA. Given the intense scrutiny of dogs by the GGNRA and the City and County of San Francisco over the past decade and more, the fact that there is not more persuasive real data about significant impacts of off-leash dogs means that there is no real justification for the proposed restrictions contained in the Preferred Alternative. The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with dogs, and could lead to an increase in conflict as more and more people are forced into smaller and smaller areas. The impacts of people moving from the GGNRA into city parks is not adequately addressed in the DEIS.

Any alternative must address these impacts on city parks and ways to mitigate them. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for

these local residents. I love San Francisco. I am proud to be part of a community that embraces all of our differences and strives to make our community work for everyone. After careful consideration I ask the GGNRA to develop a new alternative, the A+ Alternative, that will better balance the recreational needs of the Bay Area with protection of natural resources. The A+ Alternative would include everywhere that is currently off-leash, plus sufficient off-leash opportunities in San Mateo County to meet the demand, and more trails off-leash throughout the GGNRA. In addition, new land added to the GGNRA would include off-leash areas, especially in those areas where it has traditionally taken place. There would be no compliance-based management strategy in the A+ Alternative. Any dog management philosophy in the GGNRA, like that for any other recreation use, should be based on Bay Area values of co-existence, shared space, collaboration among park user groups, and education where problems arise. Enforcement of already existing regulations should target irresponsible dog owners who create the few problems documented by the GGNRA, while allowing responsible dog owners to continue their traditional off-leash recreation without harassment.

Thank you for your consideration. Sincerely, Michelle Magee San Francisco, CA 94112

Correspondence ID: 3734 **Project:** 11759 **Document:** 38106
Received: May,28,2011 21:04:43
Correspondence Type: Web Form
Correspondence: Please protect the wildlife by not allowing unleashed dogs to have full access to GGNRA. It would be my hope that designated areas for dogs can be established in areas that will not adversely impact the wildlife, nor the habitat.

Thank you for considering this compromise.

Correspondence ID: 3735 **Project:** 11759 **Document:** 38106
Received: May,28,2011 21:57:12
Correspondence Type: Web Form
Correspondence: I can not encourage the National Park Service more strongly to follow through with this plan. The needs of wildlife far exceed the needs of people to be able to walk their dogs off leash as they would like. The whole reason of the National Park Service is to preserve nature and wildlife for all Americans, now and in the future. How can you accomplish that great goal when the lands you seek to preserve is overrun with dogs off leash? As an avid hiker (I hike 20+ miles with 4-5K altitude gain once a week), I have

found people with their dogs off leash in areas closed off to dogs far too many times. When this is mentioned to the dog owners they either get hostile, ignore me or state their dog is perfectly trained and the rules do not apply to them. Just hiking I have been cornered more times than I care to remember by snarling, dangerous curs. rarely do the dog owners, or is the supposed appropriate term "guardians", apologize as they struggle to get their dogs under control. Once two women kept up a conversation while one of them got their snarling pit bull and drug it away from me without uttering a word to me. I know there are many mature, sensible and polite pet owners in the world, but having been bitten once and kept off the trails for weeks after while I healed, the inconsiderate ones are my biggest fear, as I have a right to be on the trails unmolested by supposedly domesticated animals. So, I will not deny I have other motives aside from the preservation of wildlife. It is sad enough that there is potential danger from other humans, and wildlife, I should at least be safe from supposedly domesticated animals. I won't even begin to discuss the continuing issue of dog feces, either in the open or bagged up and left on the trail (who do they think will pick it up? The park maid??). I hope and pray this plan comes to full fruition and I am willing to write whatever letters, emails or make what ever telephone calls necessary to secure its implementation. Respectfully, James W. Blaine III

Correspondence ID: 3736 **Project:** 11759 **Document:** 38106

Received: May,28,2011 00:00:00

Correspondence Type: Web Form

Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation

following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 3737 **Project:** 11759 **Document:** 38106

Received: May,28,2011 22:51:19

Correspondence Type: Web Form

Correspondence: I oppose all the Alternatives in the DEIS (especially the Preferred Alternative), I do not feel such severe restriction are warranted and would like to see enforcement of current regulations and cooperation between the GGNRA and diverse citizens representing the interests of local urbanites here in the Bay Area. I love walking my dog off leash and under voice control at Fort Funston. I want a dog management plan based on real science, not pre-determined biased obscure observations with guessed at causes and outcomes. I want to cooperate with the Sierra Club and with disability advocates and other concerned groups because I am a steward of the land and appreciate being there. I am an environmentalist and a conservationist and a dog lover and active hiker with dogs.

Compliance-based Management Strategy cannot be part of any plan. It changes status of areas (off-leash becomes on-leash; on-leash becomes no dog) automatically and permanently if GGNRA claims not enough compliance with new restrictions. No evidence of impacts from non-compliance are necessary, only the fact that there is non-compliance. This will potentially end off-leash access without giving people a chance to comment on the change. This punishes responsible dog owners for the bad actions of a few irresponsible ones. It must be opposed and removed. This poison pill is unfair and unacceptable. I oppose the Preferred Alternative because it is too restrictive. There is no justification in the DEIS for major changes. I support formalization of 1979 Pet Policy PLUS off-leash access in the current GGNRA and on new lands that the GGNRA acquires in the future.:

Recreation ? The GGNRA has a recreation mandate and the DEIS treats recreation as an adverse impact, rather than a value to be preserved. DEIS should add section evaluating benefits of recreation. Urban Environment ? The GGNRA is in a dense urban area, yet the DEIS is written as if the Bay Area and its residents don't exist just outside its boundaries. This is an urban area, not a pristine wilderness. The DEIS ignores impact on residents or area resources, especially city parks if restrictions take effect. Note that the SF Board of Supervisors passed a resolution opposing the Preferred Alternative because of the lack of study of impacts on city parks. Human Environment ? The DEIS does not consider impacts on the health (physical, mental and socialization) of people if dog walking is severely restricted. The DEIS also

does not consider impacts on social communities of people with dogs at GGNRA sites of severe restrictions take effect. Active recreation with dogs is an activity all the members of my family share; kids, teens, parents, aunts, uncles and grandparents walking on the beach together with our dogs. Family recreation activities really should be maintained. Walking dogs bring people together into communities and I have met new friends while at Fort Funston walking my dog. This is very important to me. Undocumented Assumptions ? The DEIS is full of assumptions about impacts ? things that "might" or "could" happen ? but there is no evidence of actual observed impacts. Cannot base management plan on hypotheticals. The GGNRA has had years to observe and document actual observed impacts. The fact the GGNRA did not include them in the DEIS indicates they don't exist. I have never seen dogs causing major problems, not attacking people or bothering bank swallows or snowy plovers at Fort Funston. I have seen all terrain vehicles down at the beach at this and other beaches. Safety ? DEIS claims a major safety problem with dogs in the GGNRA. But their own data indicates dogs accounted for only 2% of serious safety incidents involving dogs. The vast majority of serious incidents involved people only. Even if you include non-serious incidents, dogs accounted for a mere 7% of incidents in the GGNRA. Dogs are not a major safety problem. I walk thru the tree lined trails there and as a woman I feel safer on a deserted trail without a dog at my side. Diversity ? Dog walkers constitute the most diverse group of people who use the GGNRA ? seniors, kids, people with disabilities, gay and straight, all ethnic groups, all religions, all social and economic classes ? all interacting in positive ways, bound by their common love of dogs. There is no mention of this diversity in the DEIS. Minorities are mentioned only in the context of being afraid of dogs. The DEIS incorrectly quotes from a focus group of people who had largely never been to the GGNRA as proof that minorities don't come to the GGNRA because of the dogs. DEIS did not consider negative impacts on minorities and disabled who lose access to dog walking. I meet all sorts of diverse people and their dogs when out at Funston, especially on those few spectacular gorgeous days when it is a cross section of the Bay Area represented on the trails. Bad science ? The DEIS uses misleading literature citations to claim dogs have negative impacts on wildlife and the environment. When examined closely, many of these studies do not say what the DEIS says they do. Other references cite non-existent studies. Claims of impacts on snowy plovers and bank swallows are not supported by available data. The DEIS must start over and study actual impacts documented to occur at each site in the GGNRA, and must consider whether there are simpler mitigations that can address any impacts that are actually found. Management Tools ? The DEIS does not consider simple management tools that could be added to the 1979 Pet Policy that could alleviate concerns without needing to ban people with dogs. For example, if concern is dogs going over cliffs at Fort Funston, a low-lying fence near the cliff and better signage could keep people and dogs away from the cliff. Education programs to socialize dogs to horses

could help reduce negative interactions between horses and dogs on trails. Visitor Experience ? The DEIS describes the visitor experience as focused on people who don't want to be around dogs. I love bring my super friendly dog there to meet anyone who came without one - just to be around dogs! I have heard this on multiple occasions. Relative Impacts of Dogs Compared to Other Causes ? The DEIS considers dogs as if they are the only thing in the GGNRA. There is no context. For example, there is no discussion of impacts of natural predators on snowy plover birds and how that compares to those from dogs, or how do disturbances from people compare to disturbances from dogs. Without this context, the DEIS cannot say restricting dogs will have a significant positive impact on species. Horses, humans and ATV's have a MUCH higher impact. Negative impacts on dog behavior ? The DEIS did not consider negative impacts on dog behavior caused by severe restrictions on off-leash in the GGNRA and by resulting overcrowding in city parks. Dog behaviorists, including Ian Dunbar, Trish King, Jean Donaldson, and Veronica Boutelle, have said the loss of off-leash exercise will cause an increase in problem dog behaviors, including bites. This resulting increase in problem behaviors will lead to an increase in surrenders at city shelters, which cannot handle the increase. This is another impact on surrounding communities that was not considered in the DEIS. The SF Animal Control and Welfare Commission held a hearing on this and passed a resolution calling on the Board of Supervisors to oppose the Preferred Alternative because of that. Lack of Site Specific Information ? The DEIS fails to document actual impacts on resources at each site. DEIS assumes that if an impact "could" occur, it does occur at each site, even though there is little evidence of actual impacts documented at each site. If the DEIS cannot document actual impacts, then they cannot restrict access. Non-compliance does not equal negative impacts ? The DEIS assumes that non-compliance with leash restrictions means there are negative impacts on environment by dogs. Yet there is no evidence that impacts actually happen. DEIS has to re-evaluate that assumption and must base any conclusion on actual documented impacts.

Correspondence ID: 3738 **Project:** 11759 **Document:** 38106

Received: May,28,2011 23:09:41

Correspondence Type: Web Form

Correspondence: I come to review the GGNRA Dog Management Draft Plan ("the Plan") with three perspectives, that of a parent of children who were afraid of dogs, of an active Presidio restoration volunteer, and as a dog owner. Incorporating all of these perspectives, I find the "preferred alternative" put forth in the Plan too restrictive for dogs and their people. Alternative A is the best option.

The executive summary states that the current GGNRA practice is not

consistent with the policy of the National Parks as whole. Consistency is not the goal that we should seek. Clarity and appropriateness of policy will serve the most people. The GGNRA is an urban park and must respond to the people who live here as well as the nation. The National Park system is much too restrictive in its dog policy. Since getting a dog our NPS visits have plummeted. The GGNRA can lead the way toward a more inclusive dog policy. According to the Humane Society of the US 39% of households own dogs. All of our national parks are prohibited to 39% of the population who would like to hike, ski, or explore with their dogs. The GGNRA

The Plan states that current practices "compromise visitor and employee safety". The level of incidents reported in the plan. The plan states that there were 43 dog bites in the year 2007-8 in the whole area covered by the plan. Considering the huge usage by dogs and people this is a miniscule! There is no mention of human on human injury or damage during that time. In the grand scope of the GGNRA and in the city this is not a problem.

While the plan spends a lot of time trying to calculate the impact of dogs on the landscape and wildlife (a huge 45 incidents of dogs chasing wildlife), there is no consideration given to the positive effect that off leash use has on the dogs and people who use it, or the loss that would be experienced if off leash access were curtailed. Off leash hiking is not at all the same as leashed walking. The quality of my experience as a human is greatly enhanced by being able to walk at my pace on a trail and to see my dog interacting with her ball or other dogs or with all the smells on the trail. Going to a dog park is like hanging out at a bar or coffee shop (for both owner and dog). It is not like taking a real walk or run. The benefit of off leash dog play of course goes to the dog too. Many experts (including former SFSPCA director Jean Donaldson) agree that off leash exercise decreases dog aggression and allows them to exercise in ways that they can't on leash. Leashed dogs can really run very far or very fast unless they have super athlete humans on the other end of the leash.

My children were initially fearful of dogs, but the many good experiences with off leash dogs at our beaches taught them about dogs. This experience enhanced their lives. The wonderful off leash access that our dogs currently enjoy makes GGNRA a destination for folks traveling with dogs. This type of experience should be expanded in our National Parks, not reduced.

The presence of people and their dogs increases public safety at places like Ft. Funston. For example leash controls would likely decrease the number of people out at Ft. Funston on winter evenings and make that place less safe for everyone who does go. I am much more afraid of other humans out there than dogs.

Decreasing off leash areas in the GGNRA would have a negative effect on

parks in San Francisco, increasing the density of dogs in the off leash areas and dog parks in the city.

The GGNRA would do well to work with local dog groups to enhance compliance with reasonable laws and regulations. I often see dog owners reminding others not to trample plants on the beaches and bluffs. We pick up after each other. I find the level of dog waste on trails and beaches to be extremely low! When local frequent park users are onboard, they can be a major help with compliance. At an open house I heard that "ease of enforcement" was a priority in making some of these regulations. I object to this. People's needs and rights to use the land should lead, not police convenience.

I would like to some specific comments to the three areas that we use most: Crissy Field, Baker Beach and Ft. Funston. ?Both Crissy field and Baker Beach have very different densities of people at different times of the week. Weekend use is high and weekday use is much less. If need be, there could be different dog usage restrictions on the weekends. This would mainly require some decent signage and initial education of users. It would be quite a huge shame to ban dogs on Baker beach on Wednesday morning when no one is there because there are lots of family picnickers there on the nice weekends of the year. The same goes for East Beach on Crissy field. On weekends and after work during the windy season, the beach is packed (kite and windsurfers), otherwise it is very sparsely populated. ? At Ft. Funston inappropriate dog-horse interactions could be greatly mitigated by appropriate signage at the major access points to the trails and beach. Many people don't know that folks occasionally ride horses there. The sign near the hang-glider landing area could be a model for the type of warning needed for horses.

I appreciate the opportunity to contribute my input.

Correspondence ID: 3739 **Project:** 11759 **Document:** 38106

Received: May,28,2011 23:16:49

Correspondence Type: Web Form

Correspondence: Dogs have lived with humans for 10 thousand years. We have domesticated them and they have relied on us for a long time. Dogs also provide a love ambiance that helps reduce stress. To repay them for this, we should provide them with a good place to run around off-leash. Dogs should be allowed off-leash within the GGNRA.

I have a very energetic dog who needs to walk off-leash for at least 30 minutes everyday; and i walk her in many places within the GGNRA. Fort Funston, Crissy Field and Baker beach to name a few. I really love walking

with her off-leash; if the restrictions are put into use, my life, and my dogs life, would be effected in a negative way. I'm sure many, many more dog owners feel the same way. I am a 14 year old who volunteer with the Presidio Park Stewards, so I understand that dogs do have an impact on plants and the habitats of animals of all kinds. But dogs are also animals who have needs, and can also work with nature instead of against it.

Dogs need exercise to stay mentally and physically healthy. It needs to run, just letting it into the backyard will not insure the dog gets enough exercise. The best way for a dog to get exercise is by playing with another dog. The dogs run, wrestle, and chase each other, which can only happen in the dogs are off-leash. When dogs get tired they are less likely to be aggressive or have behavior problems. "A tired dog is a good dog". Fort Funston in the most popular dog park in San Francisco, and every GGNRA proposal would cut more than half of the dog off-leash areas out. If the most popular dog park in San Francisco is cut in half the people will go else where. But most other dog parks in San Francisco are too small to handle half the dogs that go to Fort Funston. Too many dogs in a park will pose more problems with waste and destruction of habitat. If the GGNRA cuts too much away there will be overcrowding in other parks.

As I see it, the GGNRA's current dog policies are working fine for everyone who visits the parks. Option A (keeping it the same) is how I would like this to turn out. I do not see the negative effects of dogs within the park. I hope you will consider my points and opinions.

Correspondence ID: 3740 **Project:** 11759 **Document:** 38106

Received: May,28,2011 23:38:28

Correspondence Type: Web Form

Correspondence: I am a senior lesbian who moved to Pacifica a year ago from the East Bay to enjoy the beautiful ridge trails and ocean walks. Since moving here I find that the GGNRA is proposing to limit the places I can walk my dog even on an a leash, and is planning on limit further off leash walking. Sweeney Ridge where I often go with my dog will ban dogs completely and Milagra ridge will limit the trails available to me with my dog. As I understand it the area for off leash walking at Fort Funston will also be decreased. We live in an Urban area one with many dogs. By limiting access to this degree, becomes collective punishment of all dog owners. Rather than hold those who do not respect others, accountable all of us must pay. We live in a lovely natural place. All, including dogs have a right to share it. There should be more off lease areas not less. Next environmentalists will be pushing to exclude people form the parks as well.

Correspondence 3741 **Project:** 11759 **Document:** 38106

ID:**Received:** May,28,2011 23:39:21**Correspondence Type:** Web Form**Type:****Correspondence:** I have been volunteering for the GGNRA for the past 17 years and have seen population pressures mount on park resources with each passing year. I feel there needs to be a better balance of human recreation vs protection of natural resources. For this reason, I urge you to go with the preferred alternative, particularly as it applies to Fort Funston.

While I don't trivialize the importance of dog walking as a form of recreation, I don't feel it should be allowed at the expense of native habitat for wild animals and the ecosystem that supports them. The fact that dog ownership in SF has risen dramatically should not be the reason for the further demise of endangered animals and degradation of their habitat.

Correspondence ID: 3742 **Project:** 11759 **Document:** 38106**ID:****Received:** May,28,2011 23:57:41**Correspondence Type:** Web Form**Type:****Correspondence:** Please do NOT change the current pet policy on GGNRA lands. There are currently so few places in San Francisco to walk dogs off-leash. Restricting access in the GGNRA would further reduce off-leash options. Humans and dogs seem to co-exist currently. There have been few "incidents" involving off-leash dogs. If NPS is concerned about damage to natural resources, then it can issue citations to violators, but it should not punish all dog owners for the few scofflaws in our midst.

Correspondence ID: 3743 **Project:** 11759 **Document:** 38106**ID:****Received:** May,29,2011 00:25:22**Correspondence Type:** Web Form**Type:****Correspondence:** Dear Mr. Dean, My name is Brian Bullard. I am a fourth generation San Franciscan, currently living in Marin County, since 1957. I am an owner of Fur Family & Friends, a pet care agency, and am a member in good standing of Marin Pet Care Association. I have permits to walk on Open Space with my client's dogs and I walk on GGNRA property daily. I am truly concerned about the newly revised plan for dogs. I am also concerned about how dogs impact our environment, and I take great measures to keep them under control and clean up after them. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment",

but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Brian B Bullard Larkspur CA 94977

Correspondence ID: 3744 **Project:** 11759 **Document:** 38106
Received: May,29,2011 01:27:41
Correspondence Type: Web Form
Correspondence: Frank Dean General Superintendent, GGNRA

Re: Dog Management Draft Plan/DEIS

Dear Superintendent Dean:

As a longtime resident of San Francisco, I have for many years walked and enjoyed GGNRA lands, especially the Crissy Field area and the Marin Headlands, and am delighted that the National Park Service has developed a comprehensive plan to regulate dog walking in the GGNRA.

I strongly support the NPS preferred plan. It is a thoughtful compromise among competing interests and, if observed, would allow for greater preservation of GGNRA's natural and cultural resources and greater enjoyment of the GGNRA by many diverse park users, present and future.

I am concerned, however, that compliance will be a major issue. One example: I have seen numerous people running their dogs off-leash through the Crissy Wildlife Protection Area in knowing defiance of posted leash requirements. The NPS must retain sufficient powers to enforce compliance with the plan, without resorting to further rulemaking.

The draft plan's "75% compliance" proposal is a good idea, but the requirement should be higher ? 95% ?

Can some or all of the "Regulated Off-Lease Areas" be fenced, so there are

clear boundaries for dog owners and other park users?

Thank you for your extensive efforts in publicizing, and soliciting comments on, the draft plan. The GGNRA is a fantastic national resource which deserves our protection and preservation.

Nancy Smith

Correspondence ID: 3745 **Project:** 11759 **Document:** 38106
Received: May,29,2011 01:33:41
Correspondence Type: Web Form
Correspondence: Superintendent Dean,

My name is Steve Hooker. I live in San Francisco, and have done so since the mid '70s. I have raised my family here, I own a home here, I own a business here. The land that you are responsible for is land I have been going to for several decades. I took my young son to the beaches in this city, I took my dog to the beach in this city. I continue to take her there daily, along with other dogs. I plan on growing even older than I am by continuing to go to the beach in this city on a daily basis. My idols are those older people who make the trip out the beach daily with their dogs. I will be them before long, if I am lucky.

My own usual haunt is Fort Funston. There are older people there that amaze me, who don't seem like the type to be hiking around out there, but more like the type who should be at home with a book, or in front of a screen. They know that they need to stay active if they are going to stay active, and do you know how they manage to keep themselves active? They have dogs. The dogs need to be cared for, and so they take them out and get them exercise and play and let them take care of their business too. In the process, they stay in touch with the other folks who frequent the area, and get their own exercise. They have a community, the inspiration that comes from going to a place of great beauty, and they are healthier for it. Some of them would not be able to do it if required to have their dog on leash, as an excited dog can pull and cause a person to fall and hurt themselves.

In addition to the elderly folk, there are young children, some there with their own dogs, and others who are unable to have one but who want to know about them, and relate to them. This is where that can take place, where the dogs and the kids can educate one another about how you get along with and understand another species, that shares a long history of cooperation and companionship with our own. That may not be Smokey Bear's business, but Smokey is sharing city beach lands with city dwellers, and he just might have to make a few adjustments to the way he does things.

While kids are at the park, they aren't watching TV, playing video games, eating french fries, drinking soda, etc... They are getting exercise, and that has to be contributing to their health, don't you think? Isn't there a Healthy Parks Healthy People program, and wouldn't getting people to the park be a major part of implementing it, whatever it was?

You will also find people of all races, ethnicities and religions, people with handicaps, dogs with handicaps, and more. You will find people and dogs getting exercise and socializing. There can be no better "use" of such a place. And if you don't want us to "use" it, then don't insist that it is a park.

The draft plan doesn't take into consideration for a second what a negative impact all of its options would have on this city (even the "no change" option contains the compliance based management system, which is clearly designed to get all dogs out of your park step by step). It goes so far as to say that that impact is of no great importance in the development of a plan. If you take away recreation at the beach from a city like SF, you turn us into a landlocked city, and do us a great disservice. Does the GGNRA just not care that this is one of the main ways we "recreate" in this part of the world. Recreation is part of your (the GGNRA's) mandate, and you (the GGNRA) do exist inside of municipalities that gave their lands to you with the understanding that the ways and needs of their people would be of some importance to the GGNRA. Your "park" does not exist as a plot of land that we drive to from some distance so we can view it from behind a barrier. The place you are in charge of is in our back yards, literally. If you see no reason to work with us then you have no right to serve as the stewards of our beaches.

Do a study if you have to, or you could take it from me: the people who go to the beach (besides sunbathers, and a very few others) are people with children and people with dogs. If you succeed in taking dogs out of the GGNRA, you will end up getting rid of the people who go there as well. The scariest part of that is that it seems to be your ultimate goal. Why else target the people who use the area the most, or make a lot of claims that are either untrue, unsubstantiated or ludicrous. I know you have heard this over and over, but the science that this plan is based on is not even flawed or skewed science. It is nonexistent science. You yourself admitted as much at the SF Land Use Committee hearing where you told Scot Wiener that you had no numbers to back up your claims. And of course, the NPS has a record of using "biased, improper, mistake-ridden work by scientists" (not my words, but the Interior Department's office of the solicitor's, in regard to the Drake's Bay Oyster Company issue).

I am sure there are some changes that could be made that would allow us to better share the resources within the GGNRA, but this plan makes no attempt to suggest any such changes. Instead, after years of "study," and a

ton of our money, it makes a lot of unsubstantiated claims about the potential impact of dogs on plant and animal species. Such claims need to be backed up with scientific documentation, and they haven't been.

We need a few things, and they won't happen unless this plan is seriously altered or not implemented at all. Here are a few:

The preferred alternative cannot be allowed to go forward. It is more than too restrictive, Parts of it are downright dangerous. Having the off-leash area at Funston be an area that borders the cliffs and the parking lot, given that the density in that area will be greatly increased shows a complete disregard for the safety of the pets that will be using that area. Leashing packs of dogs while descending to the beach is also a recipe for disaster.

The compliance based management system has got to be removed. It will not be implemented in a fair way. There is no way to measure compliance as a number reliably, and it will be done subjectively, by a 3rd party who will have no interest in being accurate anyway. There will be some level of non-compliance, and that level will be called excessive, and off leash will become leash, and leash will become no dog.

The existing pet policy needs to remain in place, and new lands (especially in SM county) need to have some dog recreation land, including off-leash areas. One thing that came up at the SF Supervisors' hearing was the fact that some of the users at Funston and Crissy were not from SF. Do you want to know why that is? They have no off-leash space available to them in San Mateo County to speak of, and the plan would make it so that they have less.

Where there are real safety concerns, changes can be made to situation as it is. Fences/barriers, improved signage (that wouldn't be hard). Consideration for the impact on the population of this city (canine and Human) should be evident, and consideration for the impact on City parks should as well.

We can work together to make something that works better than what we have now, but the alternatives in the present DEIS cannot be seen as suitable, even with some tweaking, ...none of them. Work with the cities you inhabit, and we will work with you. Show us that you don't care about people, dogs, recreation, or health and happiness through exercise and the inspiration that comes from spending time in nature, and we will all lose so much. I wouldn't wish a San Francisco with no beaches for people and dogs to enjoy on anyone. I would truly love for the GGNRA to continue to be something worth treasuring. I can watch TV if I want to see nature. I want to experience it, with my best friends, every day I possibly can. You would take that privilege away from me and my neighbors. Don't do it.

Steve Hooker Owner-Operator, Hooker's Hounds SF Resident Not a big Fan of the DEIS

Correspondence ID: 3746 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I used to live in the Bay Area and hiked in Golden Gate Park. I was aware of a lot of the trail heads closed due to sensitive environmental replenishment. Its very important to save this area and ecosystem. One of the most beautiful in our great nation!

Correspondence ID: 3747 **Project:** 11759 **Document:** 38106
Received: May,29,2011 08:29:33
Correspondence Type: Web Form
Correspondence: Dear Sir or Madam:

On behalf of my wife and our five year old, neutered male pug, we not only implore you, but we beg you to choose Alternative A (no action) for the San Francisco areas of Crissy Field and Fort Funston. All alternatives suggested other than no action have an adverse effect on my family, my dog, and our dog walker.

Ever since my family and our dog relocated here to San Francisco over three years ago, we have paid for a dog walker to help with our dog. And ever since then, our dog receives the requisite exercise Monday through Friday while my wife and I work demanding corporate jobs during the week. We pay a fair amount to compensate the dog walker and in return, our dog is well taken care of. We, as the owners, are assured that proper daily exercise been given to our dog by our dog walker. Further, we have used only two dog walkers in the city of San Francisco and both proprietors had come highly recommended and are well reputed with other dog walkers and owners in the city.

By proposing alternatives that reduce or eliminate geographical area for monitored dogs to roam restricts the logistics of how to best serve the group of dogs that are taken out for exercise. This in turn may congest the approved areas, reduce the surface area for the dogs to exercise, and ultimately, the dog suffers from an unproductive outing. Further, our dog walker will then be unable to provide the same level of service in the same amount of time. They may have to reduce the number of dogs taken out per outing and raise prices to their customers for the lost scalability. We, as dog owners, would suffer as well by having to pay higher prices and/or suffer

from not having our dog being properly exercised.

We are not insensitive or not understanding for the need to propose alternatives that mutually benefit all natural and cultural resources and ensure visitor safety for all that patronize the GGNRA. Unfortunately, after much thought and consideration, none of the alternatives other than no action, keep the same level of benefit for my family, our dog and our dog walker.

We feel the adverse effect of these alternatives, other than no action, simply cannot be condoned. We attended one of the first public house open meetings at Tamalpais High School and voiced our concern and also wrote in comments at several booths. We suggested the following programs to be explored since we are advocates of Alternative A: 1. Have dog walkers register with the GGNRA to establish proper channels of communication and documented compliance. 2. Post placards for an email address or website to report patrons who are damaging natural resources or endangering visitors of the GGNRA.

We simply wanted to reiterate our current position and hope you kindly consider our position of endorsing Alternative A. Thank you very much.

Sincerely,

Christopher and Renee Mendez

Correspondence ID: 3748 **Project:** 11759 **Document:** 38106
Received: May,29,2011 08:45:51
Correspondence Type: Web Form
Correspondence: To Superintendent Frank Dean,

I have been a resident of San Francisco for over 10 years. My family and I really enjoy many of the GGNRA parks. We have a 2-year old son and a dog, so the GGNRA parks provide opportunities for us to all spend time together.

If you limited the dog areas in your parks, it would definitely negatively affect our opportunities to enjoy nature together. There are many, many dogs in San Francisco and they deserve to have places to exercise along side with their families.

I think you should support maintaining the existing dog areas (both on- and off-leash) while looking for additional areas that could be used for dog activities. Public education and outreach would also be useful to show the

public how to properly respect the GGNRA land.

It does not make sense to further restrict the use of GGNRA land for recreational and dog use. In San Francisco's urban environment, all opportunities for recreational and dog use are already fully accessed by our residents. We need more opportunities, not less.

Thank you in advance for your thoughtful consideration, --Edward
Pertcheck

Correspondence ID: 3749 **Project:** 11759 **Document:** 38106
Received: May,29,2011 08:59:47
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I'm a resident of San Jose. There is nothing even remotely close to the Fort Funston/Ocean Beach experience in our area. My dogs and I make a weekly trip "up North" to enjoy the off leash freedom and unique beauty these places have to offer. In the 6 yrs I have been doing this I have yet to see a dog guardian who does not have voice control, intentionally enter a restricted area, or fail to clean up after their pet. These GGNRA areas are urban park settings, not a wilderness areas. The DEIS fails to recognize that GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship. I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration.

Mai Idzkowski 2151 Nassau Dr San jose, CA

Correspondence ID: 3750 **Project:** 11759 **Document:** 38106
Received: May,29,2011 09:09:20
Correspondence Type: Web Form
Correspondence: Please do not change the current dog policy.

Correspondence 3751 **Project:** 11759 **Document:** 38106

ID:

Received: May,29,2011 09:13:11

Correspondence Type: Web Form

Type:

Correspondence: Before I had my daughter, my girlfriend and I (now my wife) would take walks with our pit/lab mix all over the city. The best off-leash area is Fort Funston by far. We call it dog heaven. Now our daughter is almost 2 and our dog and her are best friends. My daughter is a kinder more empathetic person because of their relationship and we look forward to our walks at Fort Funston every week. Because of the high wind and cold weather in that area, that area is only suitable for dogs and hang gliders most days out of the year. There are no absolutes in life and accidents do happen from time to time, it's because of an irresponsible owner or inattentive parent and you can avoid them easily because you usually can see them a mile away. We've been going there almost every weekend with no issues.

Correspondence ID: 3752 **Project:** 11759 **Document:** 38106

ID:

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: I attended the hearing of the Board of Supervisors and heard both sides of the argument. I was surprised and shocked at the lack of real research or facts about what's actually happening in these urban recreation areas. No one was able to link off-leash dogs to any issues that you are facing. Until there is a real exploration of the problem, it is irresponsible to ban off-leash dogs.

Sincerely, Kim Thompson San Francisco, CA 94117

Correspondence ID: 3753 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Do NOT change the current dog policy.

Correspondence ID: 3754 **Project:** 11759 **Document:** 38106
Received: May,29,2011 10:10:46
Correspondence Type: Web Form
Correspondence: Re: Public Comment into the presence of dogs in the listed bay area sites.

It would be ideal to keep dogs out of all biologically sensitive areas, which includes almost every site on the list. The breeding and routines of native species must be preserved and maintained and dogs are extremely disruptive. This includes leashed dogs if only because their owners often ignore the leash once in situ.

That said, I understand this is an unrealistic demand. Therefore my "public comments" would be as follows:

Allow urbanized areas such as Ft Mason, Chrissy Field, and Fort Point as leash-free dog runs. Also, as a compromise, allow Fort Funston to continue to be essentially the dog run that it is (replete with untended feces) with the caveat that this does not include the lower beach area, only the upper iceplant infested bluffs surrounding the parking lot. Otherwise, dogs have no business in the areas listed where seabirds forage, interact, and mate.

While native species are my priority I believe this is also a matter of public safety. I am a parent and a domestic animal lover as well as a naturalist. I have had the misfortune of being mauled (almost to death, in 1983) by a pair of "family dogs" who "wouldnt hurt a flea" so I am well aware of the potential danger dogs pose that their owners are often most unaware of. When unleashed slightly aggressive/over friendly dogs can be at best scary to children and at worst, dangerous. I feel that areas like Chrissy Field are excellent dog-runs, populated with many people and that dogs will tend to behave better in this more supervised setting than when in the more wild, exciting, environments of sparsely populated beaches. This is indeed a matter of public safety.

Thank you for your attention to this matter.

Sincerely, William A. Cuevas

Correspondence ID: 3755 **Project:** 11759 **Document:** 38106

Received: May,29,2011 10:16:31

Correspondence Type: Web Form

Correspondence: I take my dogs to Ocean Beach or Fort Funston on a regular basis. They love the freedom to roam & sniff & I enjoy the exercise keeping up with them. I NEVER let them bother the birds or other wild life & I pick up not only their poop, but any other poop/refuse that I see lying around. It would be a terrible blow to no longer be able to let them go off leash. I believe that the threat of losing this privilege has awakened all dog owners to the urgency & importance of keeping their dogs under control. I hate to ever throw anyone under the bus but perhaps it is the professional dog walkers who have an excessive amount of animals to oversee & who are perhaps not a diligent as the owners who are the real problem. Perhaps more guidelines about the number of dogs one has under their control is in order but PLEASE don't totally forbid off leash activity. Thank you for allowing me the opportunity to make my feelings known. Sincerely,

Stephanie J. Garrett aka Doxie mom to Max & Fred

Correspondence ID: 3756 **Project:** 11759 **Document:** 38106

Received: May,29,2011 10:41:43

Correspondence Type: Web Form

Correspondence: Gentlemen; i have read the entire GGNRA draft dog report as it relates to me and my dog (Crissy Field, Stinson and a few other places).

i have been walking dogs at Crissy for over 40 years and since about 2000

almost daily.

I think the proposals are stunningly awful. For over 150 years the GGNRA lands and Presidio have accommodated the local public wonderfully. Even back in the 1950s when places like Fort Cronkite were in full operation (soldiers shooting on the rifle ranges etc.) hikers and dog walkers were welcome. As a boy scout we camped there. The proposed 'plan' would ruin that.

What seems to be missing from the plan is any appreciation that these lands have been an urban, wild park. There is a claim that various species are endangered. If they have survived 150 years of intense military activity and daily dog walking one wonders why the need for change.

The argument that if dogs were allowed at GGNRA, people would urge that they be allowed in Yosemite or Yellowstone is spurious. Everyone knows the difference between an urban, entirely artificial 'museum' and wild nature. In closely reading the Draft, I see nothing but speculation about impacts dogs might have. No studies are mentioned. You are probably aware of the massive tree cutting, path building etc. that is taking place in the Presidio and the mammoth campaigns to bring people to GGNRA lands like Crissy Field (running events, camping events, visitor centers etc.) surely this activity has a much larger impact, "foot print" if you will, than dog walking yet nothing is said about it and to my knowledge no studies have been done.

Dogs have always been part of man's life. To be healthy they must be allowed to run free. The world's greatest athletes could not properly exercise a dog on a leash.

Why is GGNRA so opposed to dogs? There have been no studies to demonstrate adverse impact and they are very good for the community. People with dogs talk to one another, those without don't. I met a woman who told me that when she turned 45 she got a dog. In the next six months, by her estimate she met more people than in her entire life to that point. I met a mixed race couple at Crissy who told me that they lived in their neighborhood for two years without knowing their neighbors then they got a dog. Soon they knew everyone and made many new friends.

In my experience, dogs on leash tend to be more 'growly' and aggressive toward other dogs and people than dogs at large.

If a dog is a problem, punish it or its owner, don't punish the entire community, the vast, vast, majority of whom are well behaved and loving.

In the draft you note that eighty percent of the anti-dog comments came from out of state - get real, these lands are an urban park used by Bay Area

residents on a daily basis, not occasional visitors from Oklahoma or New York. To give these comments weight is absurd.

The draft mentions low income people are also opposed. My guess is that those people are from neighborhoods where fighting dogs are part of the culture and are very dangerous. Again, that is not Crissy Field or other GGNRA lands. Comparing their experiences with those of GGNRA users is an apples and oranges comparison and invalid.

The entire management of GGNRA with respect to dogs is contradictory. On the one hand everything is being done to encourage people to come here (and they do, in droves) but on the other, you complain that dogs create a problem. Before the Crissy Field "face lift" and even for a year or two afterwards the place was empty except for dog walkers, wind surfers, occasional bike riders and some weekend picnic parties. Today, thanks to the efforts of various governmental agencies, the place is crawling with visitors daily, rain or shine. Certainly their impact is far greater than dogs.

The preferred proposal for Crissy Field is unworkable. The off leash area is ill-defined with little parking. it seems designed to create infractions and makes no rational sense as it will only concentrate a greater number of dogs (particularly from adjoining areas where they are even more restricted) on a smaller space virtually guaranteeing problems. Further, from the maps it appears that the dog area will be the same area as is used by the increasing number of big events from which dogs are necessarily excluded. THis is short sighted and unfair.

Finally the dog exclusion or downgrade rules that add further restrictions on dogs if infractions are observed is monstrous and will result in the eventual entire exclusion of dogs. THis is calculated and mean spirited. It suggests a completely insincere effort to create a fair and workable solution to the perceived dog problem. I might add, during the short period in the early 2000s when the leash rule was enforced, the enforcement lead to huge conflicts and ill feelings not just between dog walkers and park enforcement people and other employees but also with other visitors, some of whom would aggressively demand that dogs be put on leash and seemingly go out of their way to create trouble.

My personal experience is that non-dog people appreciate my dog (and others) nearly every time we go out little children want to pet my dog, a large (65 lbs.) black poodle. Little old people want to visit with him because he reminds them of their old dog. People want to pose for pictures with him, particularly foreign visitors.

Some (very few) people or little children are genuinely afraid of dogs. That has never really been a problem. He (and most other dogs i have observed)

somehow have an innate sense that they are not wanted and stay away. He is also under good voice control and will come away and is easily leashed up.

I strongly support leaving things as they are now . If a dog is guilty of some infraction, ticket him or his owner. Don't penalize the entire community.

Best Regards Jim Thompson

Correspondence ID: 3757 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I feel as an american citizen our dogs have rights also and I want to keep the free areas to remain open to both of us to run free. Please keep the golden gate nat. rec area's dog management plan the same.

Correspondence ID: 3758 **Project:** 11759 **Document:** 38106
Received: May,29,2011 11:35:30
Correspondence Type: Web Form
Correspondence: After my father passed away 10 years ago one of the few things that cheered me up was taking the dogs, mine and his, out to Ft. Funston. Every day rain, shine or terrible wind I would pile the dogs into the car and take a long walk out at the park. Often time my step mother would join me and we could walk for hours talking and watching the dogs play. Out there is always felt like a community, I saw the same people and dogs everyday. I have meet some very nice people out there. As a small single woman I don't always feel safe in parks or by myself in them but I always felt safe there no matter what time of day it was.

I had heard from other dog people that years ago the GGNRA had banned dogs from FT. Funston and it was a terrible place to go. There was crime, a rape in fact, it was dirty and had just wasn't safe. Then the dog people took it over and it was much better. I can't say that about most parks in the City. In fact I avoid most parks in SF because I don't always feel safe or they are filled with trash or have a homeless camp in them.

When I am out there I see the dog walkers pick up after their dogs, they pick up the trash and ever have clean up days. People and the dogs get along very well. In all the years I have been going there I have rarely seen any run ins between dogs or people.If dogs get lost, someone will help you look for them. Ft Funston has become a dog park and you hardly ever seen people without dogs out there. Ft Funston is a beautiful place, but it is rather rugged

and has some harsh weather.

I do understand the park are for everyone and we need to share. The changes the GGNRA is proposing are very harsh and limiting. Over the years I have watched Ft Funston change but that was due to the weather no the dogs or even the people.

Please leave Ft Funston off leash. Do not limit the areas of access or make it off lease. I love and very much so enjoy the area as is.

Thank you

Correspondence ID: 3759 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence : May 28, 2011

Superintendent Frank Dean General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PET MANAGEMENT AT THE GOLDEN GATE NATIONAL RECREATION AREA

Superintendent Dean:

The following comments will not be unfamiliar to the Park Service. For almost a decade, a variety of conservation, animal welfare, child advocacy, and environmental justice organizations have consistently impressed upon the Park Service that it must take a proactive, precautionary approach to dog management at the GGNRA. An essential component of this proactive management is to ensure that off-leash dog play areas are designed with the safety of people, pets, and wildlife as the primary design objective.

Ensuring that dog play areas are safe is not rocket science: it is a simple design problem with a basic, widely adopted solution. Safe off-leash dog play areas must be fully-enclosed with a physical barrier-and preferably all entry and exit points double-gated-to ensure the safety of park users and protect park resources.

Enclosed off-leash dog play areas ensure that our dogs do not fall off cliffs, run into traffic, or are lost while visiting the GGNRA; they ensure, when properly located, that wildlife will not be harmed or harassed by dogs; and they empower park visitors, giving them the power to choose if and when to

have off-leash dog experiences by entering an enclosed area, rather than having the experience imposed upon them whenever they visit the GGNRA.

And perhaps most importantly, enclosed areas are solidly grounded in the non-impairment mandate that governs the National Park System. An enclosure, like seat belts, bicycle helmets, safety goggles, and other safety devices, allow us all to participate in activities that are inherently risky while reducing the probability that drastic consequences from those risks materialize. This is precisely the point of the Park Service's governing mandate: to ensure that today's activities do not degrade existing resources or future recreational opportunities by permitting risky activities without adequate safeguards in place.

This is not a controversial idea: it is the principle element of good dog park design. Animal welfare organizations and park managers around the country have already adopted this design principle. For example, the American Society for the Prevention of Cruelty to Animals (which has submitted separate comments to the GGNRA) has exhorted dog owners to "[k]eep your dog on a leash when you are outside, unless you are in a secured, fenced-in area." <https://www.asPCA.org/pet-care/dog-care/dog-care-general.aspx>. The Humane Society of the United States, in its book *Animal Control Management: A Guide for Local Governments*, has explained that "[a]dequate restraint should be defined as physical control of animals; alternative methods of restraint, such as voice control, electronic fences, and chemical sprays, are not reliable for dogs whose basic predatory, sexual, or territorial defense drives have been triggered." http://bookstore.icma.org/Animal_Control_Management_A_G_P609C16.cfm. The State of California, which went through a dog management process in 2001, concluded that off-leash dog parks should "[b]e enclosed, unless located in areas where there is clear and functional topographical or other significant boundaries." http://www.parks.ca.gov/pages/795/files/dog_park_pilot_program.pdf. Even SF DOG has explained dog owners need off-leash dog play areas to have "[a]dequate barriers, natural or man-made, to protect dogs from vehicles, steep cliffs, or other hazards." http://www.sfdog.org/do/olrm_scan.pdf.

This is why, after years participating in a negotiated rulemaking process that largely failed, the negotiators reached consensus on only one point: to create a fully enclosed, double-gated off-leash dog play area on the Oakwood Valley Fire Road. As promised by the GGNRA, this consensus position was included in the preferred alternative in the existing plan.

Unfortunately, this is probably the only sensible part of the GGNRA's preferred alternative. The preferred alternative, rather than ensuring that off-leash dog play areas are safe, creates an unworkable, expensive, and risk-inducing compliance management plan for off-leash dogs. Apparently in lieu

of erecting simple barriers, the GGNRA intends to hire monitors to observe off-leash dog behavior, ratchet-up enforcement only after violations and harm to park resources occur-through a compendium amendment process no less, which evades basic administrative rulemaking procedures that govern national parks and federal agencies-and spend millions of dollars on this process.

If the expense, time, paper, and staff resources spent to date on the GGNRA's failure to resolve the off-leash dog problem at this park weren't insult enough, the GGNRA's proposal will deliberately extend this ongoing problem for decades to come. It is patently absurd for the Park Service to waste so many government resources on such a plan when a simple, physical solution is readily available, and particularly so when the park needs to be directing its resources at risks from oil spills, climate change, and managing the highest concentration of endangered species in any National Park in North America.

Yet the GGNRA has dismissed the most cost-effective, consensus-based, and most widely adopted recommendation for designing good off-leash dog play areas: enclosing them with physical boundaries. The GGNRA "considered but dismissed throughout the plan/EIS" any consideration of enclosures because of concerns about aesthetics and because of an artificial constraint that the Park Service placed on this alternative, and only this alternative: that physical barriers be so impermeable that all off-leash dogs will be contained by the barrier. This is an arbitrary and capricious justification for precluding this alternative from consideration under the EIS alternatives section. The Park Service admits that it's preferred alternative, a compliance management program, will only strive for 75% compliance-a far lower standard than the standard the Park Service apparently applied to physical barriers when they were rejected from the alternative analysis. This is a blatant failure to comply with the National Environmental Policy Act and the Administrative Procedure Act.

Moreover, the Park Service's suggestion that barriers will destroy the aesthetics of the Park Service is not only arbitrary and capricious, but also directly contrary to the Park Service's existing practice at the GGNRA. In location after location-from Milagra Ridge to Fort Funston to Land's end to Crissy Field to Oakwood Valley to Muir Woods-the GGNRA is constantly enclosing sensitive resources with post-and-cable and other physical barriers to protect park resources and values from activities that may harm them. The Park Service's decision to eliminate from consideration enclosing threats to resources, while it continues to enclose park resources in nearly every unit it manages, is completely unexplained in the DEIR. This failure to explain its decision is a fundamental failure in compliance with the National Environmental Policy Act, and the Administrative Procedure Act.

Perhaps most importantly, the Park Service's decision to enclose the resource while allowing threats to roam the park freely is inconsistent with precautionary management and the non-impairment mandate of the Park Service's Organic Act. By enclosing park resources, the GGNRA is slowly converting this great urban National Park into a zoo-like environment, where visitors move from enclosed to exhibit to enclosed exhibit to catch a glimpse of the incredible resources available in the Park. This is precisely the opposite of how the National Park Service should be managing its resources: it should be containing threats to ensure they do not impair the landscape in away that precludes future generations from enjoying the Park. It should not be enclosing the resource into segmented areas while the rest of the Park is impacted by uses that are incompatible with its basic operating mandate.

Even if one were to put aside the inconsistency of the Park Service's aesthetic rationale for excluding enclosures from alternative analysis, it is simply unfounded on the facts. The Park Service seems to believe that only 6-foot high chain-link fences, perhaps with barbed-wire along the top, are the only physical enclosure that can be placed around off-leash dog parks. But this is far from the case. Off-leash dog parks can have a variety of physical barriers, including features from the natural environment. Indeed, a fully-enclosed off-leash dog park proposal for Lake Merritt included butterfly garden draped around the enclosure. At its core, this argument is simply a design problem, not a problem that is so intractable that it is justify to exclude from alternatives analysis.

But a few things are clear about dog management: if an area is inappropriate for a physical barrier, then it is not an acceptable place to allow dogs to roam off-leash. If the Park Service truly believes that barriers are not appropriate, then it simply should revert to the National Park Service's leash law as the preferred alternative, because the park service has failed to demonstrate in the EIR that voice control is sufficient to keep dogs from encountering dangerous situations. Indeed, several articles and recommendations that expressly state that voice control is insufficient to ensure dogs remain safe from harm, yet the Park Service has failed to acknowledge these articles while proposing to continue a voice control management plan in the Park. This is an arbitrary decision by the GGNRA: and these articles are attached, again, so the GGNRA can contemplate its error one more time.

At its core, the thousands of pages in the Draft Environmental Impact Report is nothing more than papering over a structural problem within the GGNRA. The GGNRA appears to believe that there is a political problem in enforcing leash laws to this day. And while there may have been a political problem a decade ago, the political paradigm has changed enough so that the public will support the GGNRA to enforce the law: if the GGNRA simply creates a plan worthy of the public's support. Since 2001, San Francisco has been the site of several nationally-recognized dog maulings and attacks, and the numerous

problems with pet management in both City and National Parks has changed the paradigm in San Francisco and the greater Bay Area. As the DEIR states, off-leash dogs have become a limiting factor in attracting ethnic minority groups to the GGNRA, which is particularly disconcerting given the park was established to bring national park values to urban impacted people. The Northern Arizona University phone survey shows that 71% of Bay Area residents support enforcing the National Park Service's leash law at the GGNRA. At every public hearing since 2001, opponents of leash law enforcement have been outnumbered by supporters of it: when the GGNRA provides a sensible management plan for these supporters to stand behind.

Yet again, the GGNRA has put forward an unworkable plan that, given its reluctance to enforce leash laws historically, is unlikely to be implemented; given the fiscal constraints of modern government, is unlikely to be funded, and would be inherently unjust if it was; and which did nothing to protect resources before harm occurs. In the process, the GGNRA has isolated itself from its supporters, and thereby is creating the political problem that would otherwise exist only in its own perception.

For all of these reasons, the Wild Equity Institute urges the GGNRA to reject the preferred alternative and, in its place, put-forward a pet management plan that encloses any off-leash dog play area that is permitted under the plan. If enclosures are inappropriate in a specific area, then so is an off-leash dog play area, and alternative dog recreation opportunities, such as on-leash walking, should be considered.

In addition to these comments, I refer the National Park Service to comments submitted by Charles Pfister, Dan Murphy, Golden Gate Audubon Society, and comments submitted by the Wild Equity Institute and the Center for Biological Diversity during the ANPR process, the NEPA scoping process, and the numerous other hearings that have occurred on this issue over the past decade, and incorporates those documents here by reference. In addition, I refer the GGNRA to the 2005 Leash Law Enforcement Petition and the over 100 exhibits attached to it. I would like to refer the National Park Service to additional documents that I requested through the Freedom of Information Act in December of 2010: but the Park Service has violated the Freedom of Information Act, our First Amendment rights, and our rights to participate in this administrative proceeding by failing to process those records in a timely manner. To this date thousands of responsive documents have not been disclosed. Sincerely,

Brent Plater

Correspondence ID: 3760 **Project:** 11759 **Document:** 38106
Received: May,29,2011 13:05:09

Correspondence Web Form

Type:

Correspondence: I was disappointed to learn of potential changes to dog leash laws affecting GGNRA lands. Having relocated to the Bay Area about 3 years ago from Los Angeles, one of the biggest draws of the area was the relative abundance of open space for use with my dogs. My partner Sev and I frequently take our dogs to the various parks and beaches in Marin, most often Stinson beach, in areas currently permitting them to be off leash. While back yards in Marin don't provide an abundance of space for our dogs to run freely, I was willing to pay the purchase price of a home here and corresponding taxes knowing that the park lands would essentially provide an on-demand back yard. I would encourage you to reconsider modifying the current policies and regulations of the GGNRA. Sincerely, Kurt Mortensen

Correspondence ID: 3761 **Project:** 11759 **Document:** 38106

Received: May,29,2011 13:15:03

Correspondence Type: Web Form

Correspondence: I am writing to express my opposition to dog management rules proposed by the Golden Gate National Recreation Areas.

The current restrictions are more than adequate to protect wildlife, the land, to encourage the urban parks' use, and to accommodate park users who do not like dogs.

I have yet to hear anything that even begins to convince me that their plan will benefit the bay area urban wildlife enough to warrant the drastic changes they propose for dog access to the parklands. Any tour of most of the land in question will reveal wildlife flourishing in proximity to people and their dogs. It is only because wild species are doing well under the present setup that there is any wildlife to protect and manage.

The GGNRA has not presented any evidence about how their plan will improve conditions for wild species. Instead, GGNRA comes to the issue of parkland use with a simple agenda ? fewer people with dogs is always better for the parklands. This stark ideology is no way to run any park system, particularly one that weaves its way through an urban area.

I have particular experience with the San Mateo County GGNRA lands. Sweeney Ridge, Milagro Ridge, the areas in Montara ? these lands get very little public use. Only an agency that was driven purely by an ideological agenda ? fewer dogs is always better ? would consider changing the access rules for these lands. There is simply no need for change, because the park

users' impact on these lands is so minimal.

Please keep dog access rules the way they are now, with only a few spots, like Muir Woods, closed to people with their leashed dogs. By any measure, bay area GGNRA lands are doing well. There may be a few discrete areas where changes to the present regulations are necessary. But the present GGNRA report simply does not factor in the public benefit that accrues when park users are permitted to walk their dogs in GGNRA land; nor does it factor in the impact on other non-GGNRA park lands if dog owners are forced to take their dogs to these parks because they are locked out of GGNRA lands that were formerly amenable to dogs and their owners.

Please do not reduce dog access to any of the GGNRA land below their current levels. The dog management report provides no support for reduction in access; a tour of the vast majority of GGNRA land reveals that no reduction in dog access is necessary.

Thank you.

Correspondence ID: 3762 **Project:** 11759 **Document:** 38106

Received: May,29,2011 13:18:05

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean, I have resided in the Bay Area since 1968, and have lived in Mill Valley for 31 years. I have always had dogs, and have chosen places to live that make it easy for me to have access to spaces that I together with my dogs can enjoy. Currently I live about < mile from the trailhead to Miwok Trail, where I have hiked with my dogs over 30 years. I use most of the GGNRA spaces-the Coastal Trail, Muir Beach, the Marin Headlands, Homestead Valley, etc.-in our area. I am out with my dogs almost every day (I am now retired). I am very familiar with your proposal and am extremely opposed to it. The GGNRA was established as a recreation area. Your report barely makes reference to that use. As someone extremely familiar with all the local GGRA in which dogs are allowed, I find little evidence that dogs have any significant impact on the native animal nor plant environment. I believe that dogs have less of a negative impact than certainly people-as well as other recreational users. But not only has my personal observation supported that-more importantly the GGNRA's proposal cites reasons for the severe limitations of dogs-both on-leash and off-leash-are NOT supported by scientific evidence. In addition, the majority of people without dogs, upon seeing my dogs, on trails or at the beach, seem not only not minding them, but delighted by them. They bring smiles to people of all ages. For me, my dogs are integral to my exercise, and therefore to my health. The GGNRA proposal is not only unnecessary but if enacted, harmful to the lives of both humans and dogs alike, and

would have minimal positive impact on our environment.

Respectfully,

Gayle Donsky Mill Valley 94941

Correspondence ID: 3763 **Project:** 11759 **Document:** 38106

Received: May,29,2011 13:20:35

Correspondence Type: Web Form

Correspondence: While I realize that park management involves balancing recreational uses with stewardship of natural resources, I feel very strongly that the needs of sensitive wildlife and habitats must have priority over those of visitors and their dogs.

It has been my observation over the past 10 years that leash requirements are routinely ignored by the majority of dog walkers at GGNRA sites in San Francisco. The proposed Plan is a compromise that will allow dog walkers much more leeway than they would have anywhere else in the national park system. It will be up to dog walkers to show they are willing to abide by the new regulations.

I urge that the Plan/NPS preferred alternative be modified as follows:

? Clearly define the boundaries of off-leash areas by installing fences or other barriers that have low environmental impacts. Off-leash areas that are not enclosed will not provide adequate protection for wildlife, park users, or on-leash dogs.

? Raise the standard of compliance with regulations to 95%. Given that very large numbers of dog walkers and dogs visit the park, even a 5% violation rate represents a significant number of incidents. A 25% violation rate is plainly unacceptable.

? Increase the number of trails in San Francisco that are closed to dogs. Birds and small mammals perceive a dog as a threat even when that dog is on a leash. People who are afraid of dogs or simply prefer not to encounter them should have more than one trail available to them.

? Establish a limit of no more than three dogs per person and prohibit commercial dog walking.

Correspondence ID: 3764 **Project:** 11759 **Document:** 38106

Received: May,29,2011 13:30:44

Correspondence Web Form

Type:

Correspondence: I am writing to oppose the GGNRA management plan for off-leash dogs. I have two small dogs, 20 lbs. each and as a city dweller, a fourth generation San Franciscan living in Cow Hollow, the accessibility to Crissy Field has been exceptional as a place I have gone almost every weekend for the past six years. Words can't describe how important this area is for dogs to play, run and socialize - we've been so lucky to have it. If you take it away, or limit our access, it would be a crime. Dogs need socialization - they're much better adjusted, interact better with other dogs and humans. Do you not go out there yourself to see how well-adjusted and happy dogs and owners are when they have the room to run, exercise and play? To take this away or severely limit access is just not fair. We're tax payers. We follow the laws. At Fort Mason, where dogs are not allowed off-leash, when you walk the dogs at night, there are drug dealers, homeless dwellers defecating wherever they want to; it seems you should focus your energies on these types of situations rather than law-abiding dog owners. Please reconsider.

Correspondence ID: 3765 **Project:** 11759 **Document:** 38106

Received:

May,29,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: _____ May 29, 2011 _____ (date)

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors,

families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

Although we like our neighborhood city park, Alamo Square, and play there regularly, it just isn't big enough for everyone. Our dogs are very athletic and like to exercise, they don't enjoy hanging around wrestling with other dogs, they like to work. We love Crissy Field and Fort Funston among others because they offer an expansive stretch of land for off-leash running and ball chasing which is essential for our dogs' health (as well as our own!)

It brings joy into our lives watching our dogs light up with such happiness in these places. Like many San Franciscans, we don't have children (or a yard), but we have dogs, and they are a big part of our family life. Exercising them and playing with them is how we love to spend our free time. We don't want the off-leash recreation area taken from us, we value it and visit it more frequently than most residents! I rescued a dog from the SFSPCA a few years ago and she's so smart, athletic and energetic that I have to take her to the beach to fully exercise, condition and keep her happy. She is a working dog who swims, runs and hikes to keep balanced. She cannot get this kind of exercise/stimulation at most of the city parks because they are crowded and/or small. Having access to GGNRA parks are one of the big reasons we still live here in the city and it would be devastating to lose this recreation area especially since dogs are prohibited in most California State Parks as it is.

Sincerely, _____KSF_____ (name) _____San Francisco, CA 94115_____ (city, state, zip)

Received: May,29,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: May 29, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean,

I frequent Crissy Field on a daily basis as a runner. Perhaps my greatest pleasure in experiencing this area of the GGNRA is watching the numerous dogs romping on the beach and playing with other canines. It is part of what makes Crissy Field such a fun experience. I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Align commercial dog walking rules with county or city regulations. These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA).

In regard to my experience at Crissy Field, I know there are those who have raised safety concerns about off-leash dogs. In the twenty years I have been running there on a daily basis, I have never personally witnessed a problem. IF ANYTHING, IT IS THE NUMEROUS RENTAL BIKE GROUPS, SUCH AS 'BLAZING SADDLES", THAT CAUSE ONE OF THE LARGEST SAFETY HAZARDS. There is no regulation on how many

bikes can utilize the Crissy Field walkway and on weekends there are hundreds of rental bikes. Often the riders are in groups, chatting and snapping photos of the Golden Gate Bridge. I;ve never had an off-leash dog run into me, but I have been hit on a couple of occasions by bike riders who are not paying attention.

Thank you for reviewing by comment. Again, I stand with the San Francisco Supervisors in opposing the GGNRA's dog management plan. Sincerely,

Pamella Earing San Francisco, CA 94115

Correspondence ID: 3767 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean:

I had the opportunity to meet you and both the public meeting in Pacifica and the San Francisco City Council hearing room. You seemed like a decent, forthright man. So I am particularly puzzled at your staunch opposition to dog access in the GGNRA.

I am writing to oppose the GGNRA's draft dog management plan. From speaking to you and other park service employees, I have come to the same impression as many members of the dog community -- the report is not based in fact; instead, it relies on speculations, exaggerations, misleading statements, and pure anecdote. Its conclusions are not supported by either the science or the law; nor do they even have enough substantiation to begin to convince me my conversations with you and other park service staff.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

The proposed dog management plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their dogs. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

What strikes me as particularly odd is that someone like me has a lot in common with GGNRA staff. I love the Bay Area hiking trails. I want to see them preserved. I support the park service, including funding increases, etc. I find it very distressing to find that the park service wishes to exclude me, one of their supporters, based on spotty reasoning influenced more by ideology than by science. Simply put - I thought I was part of your constituency and have found out that instead you want the GGNRA lands to be something close to a terrarium as opposed to an urban park system that encourages public use and conservation.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

honor the original 1979 Pet Policy and respect dog-walking as legitimate recreation;

provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County;

exclude speculative, exaggerated, biased, or misleading statements and studies;

provide reasonable ways to address any significant adverse impacts from recreational activities, using the same objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.);

eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

The present plan reads like an ad hominem attack on dogs. In fact, dogs' impact on the GGNRA lands appears minimal; certainly, nothing in the report our conveyed in conversation by yourself or park service staffers suggests otherwise. Speculation I heard from GGNRA staff about what might benefit the Blue Mission Butterfly or about the benefit of swaths of land through which predators may be able to migrate if there are no domestic dogs anywhere on the land do not justify the measures proposed by GGNRA.

I have walked all over the San Mateo County lands that will be affected and see hardly any people. Many of those people I do encounter are enjoying the parklands with their dogs. The facts on the ground do not warrant the draconian management plan preferred by the GGNRA.

Very truly yours,

Jonathan Lipsky

Correspondence ID: 3768 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Thank you for the opportunity to comment on the GGNRA Dog Management Plan/EIS. Everyone agrees that a balance between recreational uses and the protection of the natural resources within a park is a good thing. I strongly believe that the preferred alternative is not a balance between these two competing uses. I think it unduly favors a particular use group: dog walkers.

As a frequent visitor to GGNRA lands of San Francisco and San Mateo County for more than 20 years, I have noted that the majority of dog walkers do not follow the leash or voice control requirements. The proposed new dog management policy is too weak to protect natural resources/wildlife (plants and animals), people who have a fear of dogs, and other dogs who are on leash. To make it stronger, please:

? require all off-leash areas be enclosed to protect park users, wildlife and other dogs; ? limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats; ? provide more trails that are free of dogs (currently, only 1 trail in San Francisco will be available for those who do not wish to interact with dogs); ? limit dog walkers in the park to 3 dogs and to not permit commercial dog walking; and ? implement compliance-based adaptive management that requires at least 98% of dog walkers to comply with the new regulations.

I have personally witnessed off-leash dogs chasing snowy plovers on Ocean Beach in the area where these birds are supposed to be protected (and I do know how to distinguish snowy plovers from sanderlings).

Correspondence ID: 3769 **Project:** 11759 **Document:** 38106
Received: May,29,2011 13:56:28
Correspondence Type: Web Form
Correspondence: Dear Park planners, I am a concerned citizen who has spent nearly two hours every day on Ocean Beach from Santiago Street to the Cliff House and back - for the last 15 years. I love this beach. I love the people on this beach. I love the birds on this beach. And I love the dogs on this beach. This unique natural resource welcomes all and needs to be open to all forms of

recreation - including ample off leash running areas for our canine friends. There is no greater sight or feeling than watching dogs romp, play, and run as fast as the wind. I have witnessed hardly any problems do to the dogs - and they provide a great deal of enjoyment and pleasure to the visitors to Ocean Beach. Please maintain an ample area for our beloved friends to run - it is a noble creature who should be treated as man's best friend. Thank you, Peter Munks (call anytime, , and I will discuss this at length)

Correspondence ID: 3770 **Project:** 11759 **Document:** 38106

Received: May,29,2011 14:11:41

Correspondence Type: Web Form

Correspondence: I strongly urge the GGNRA to revert to forbidding "voice control" off-leash dogs in the GGNRA. That original plan is in compliance with federal code, and rightly so. "Voice control" is a joke. It is a misnomer, something that can be debunked in minutes through observation.

The sense of entitlement and ensuing political pressure that dog owners have in San Francisco and surrounding areas have led to making various state and city parks unenjoyable for many park patrons, including myself.

I have been assaulted various times by unleashed dogs at parks, and once by a dog owner or friend of the dog owner for defending myself from a dog attack by an unleashed dog at Marina Green (which is part of the GGNRA). The park ranger who responded to the incident seemed to imply that it was not wise to object to off-leash dogs or even them violating one's personal space. The dog owner, to my knowledge, was not cited.

In a larger context, cats (feral or domesticated), wild animals, children, and senior citizens do not attack people, but dogs do attack these and other populations of people. Then there is the impact on the fragile environment by scavenging dogs.

A more complete protection of all park users and the GGNRA itself is needed. At minimum, do not give into any diminishing of your proposals to protect the parks. Preferably return to true protection of the Bay area and all of its creatures and reduce off-leash access further than proposed.

Correspondence ID: 3771 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 29, 2011

<http://www.tinyurl.com/GGNRAcommentonline> Frank Dean, General Superintendent Golden Gate National Recreation Area San Francisco, CA 94123-0022

Dear Mr. Dean, I'd like to introduce myself and tell you of my interest in Crissy Field and the pet policy currently under consideration for the GGNRA. My name is Zoe Schwartz and I live in the Marina district just a few blocks from Crissy Field. I am a retired senior citizen and I love to walk in Crissy Field. I am also a dog owner, and my dog enjoys the walks as much as I do. Together we take long walks, usually twice a day, and these walks are very healthy for the both of us.

I am a supporter of many environmental organizations. In particular, I have been active in the Trust For Public Land which, as you know, has been instrumental in acquiring land which has been transferred to and incorporated into GGNRA. I am a staunch believer in their credo: Parks for People. Crissy Field is a unique urban park where people of varying interests including walkers, joggers bike riders, boater, windsurfers and more share an amazingly beautiful spot and do so in a respectful way. One of the first things that amazed me when we moved to the Marina district and began frequenting Crissy Field was how amazingly well the off-leash policy works and how diligently the dog organization works to maintain the cleanliness of the park. They monitor and maintain the dispensers that provide poop bags and on many occasions I have observed members of the organization picking up random poops left by some less considerate dog-walkers. They also educate people as to the sensitive areas of the park and the rules and restrictions applying to dog owners with regard to those areas. I am not a member of the organization but I admire and am thankful for their diligent efforts to make Crissy Field a place where people and dogs can get along harmoniously.

As a firm believer that "if it isn't broken, don't fix it," I do not agree with the GGNRA's proposed changes that will significantly restrict and, in some areas, eliminate off leash dog walking. I see no need for changes to the existing conditions (1979 Pet Policy). While I fully understand that there will always be a few irresponsible dog owners just as there are irresponsible people in all walks of life, I think it is unfair to punish the vast majority for the transgressions of a few. What I do see in this situation, is the opportunity for the park and the community to work together to provide clearer rules, more signage, improved vegetative barriers, and increased education and outreach as part of the overall program that balances recreational use (including dog-walking access) with preservation. For that reason, I humbly request that you adopt a modified Alternative A, the "No Action alternative". Thank you for your consideration. Zoe Schwartz

CC: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives Barbara Boxer, U. S. Senate Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Correspondence ID: 3772 **Project:** 11759 **Document:** 38106

Received: May,29,2011 14:23:33

Correspondence Type: Web Form

Correspondence: I am a 31 year resident of San Francisco and have a wife, a six-year old daughter, and a dog. All of us need open space to walk, run and play. The proposed plan for limiting access for dogs is going to, at the very least, split the family as we will be forced to exercise the dog in a different location than our child likes to play.

AS THINGS ARE NOW we (husband, wife, daughter and dog) can spend time together walking in the headland or playing at Crissy Field pretty easily.

AS THINGS MIGHT BE the opportunities for all of us to be together will be severely restricted and, I think, practically speaking, eliminated as we do not have that much time as it is.

I would add that we had the child before the dog and there were times I would have preferred to be in a dog-free place. This is something easily done with a some notices and a few additional porta-johns. However, this proposal is taking an completely insensitive meat axe to the problem that as far as I can see is not based upon any sort of study.

Our family is at Crissy Field at least three times a week with the dog at least three times a week. No one has been there to ask us a single question as to how we use the space or what we think might be an improvement. I certainly do not believe public hearings give one an accurate picture of the actual use of areas and the consequence to the area of that use. Who has time to show up at a public hearing during work hours?

Both kids and dogs need a place to run -- and a lot of those kids like running with dogs to play with.

Correspondence ID: 3773 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: 29 May 2011

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

Via E-Mail

Dear Mr. Dean,

I am writing to strongly object to the proposed Golden Gate National Recreation Area (GGNRA) Draft Environmental Impact Statement (DEIS) for areas currently used by off-leash dog walkers in Marin, San Francisco and San Mateo counties.

I urge your office to formally adopt the status quo regarding existing uses of GGNRA lands, and maintain policies that encourage varied forms of recreation in current and future acreage.

I am a middle aged Asian woman. I reside in the Twin Peaks area of San Francisco. Since September 2001, I have walked as often as possible, at least weekly, preferably daily, with my Labrador mixed breed dog at Fort Funston or Crissy Field. My dog is off leash and under voice control. My dog and I walk in all kinds of weather, year-round. I am vigilant about cleaning up after my dog, and carry extra supplies that I freely offer to those dog walkers caught unprepared or in inconvenient locations. I am a supporter of The Nature Conservancy and the Natural Resources Defense Council.

Assuming there is a need for the DEIS, other than for punitive purposes put forth by a vocal minority of park visitors whose attitudes towards dogs are generally negative, the following comments are based upon my use of GGNRA parks in all three counties, and the GGNRA public meeting on 7 March 2011.

My objections to the DEIS are that it is too broad, too vague, and applies the wrong standard to the miles of coastline subject to GGNRA oversight. The statement seeks to conform all GGNRA lands now and in the future to a standard of oversight and use that is inconsistent with urban areas and present uses. As the regional population increases, presumably the frequency of use and variety of uses for acquired lands will also increase.

Too Broad

The scope of the area within GGNRA boundaries is relatively large for an urban park, and getting bigger. At most, a single digit percentage of total lands supervised by GGNRA is currently used by recreational or professional dog walkers. The acquisition of additional land is anticipated in

the near term, and broad-brush application of use restrictions regarding that land is not supported by the DEIS.

The DEIS does not refer to specific or generalized instances of visitor conflict related to dog walking practices within existing, traditional, popular dog walking areas. The fact that previous attempts to regulate off-leash dog walking resulted in conflicts between park personnel and visitors does not mean that off-leash dogs per se constitute a health or safety risk to other visitors. Park personnel are entitled to clear guidelines regarding their duties and responsibilities. Arbitrary or seemingly arbitrary enforcement of DEIS preferred alternatives will not serve park personnel, or the public, well.

Too Vague

Adopting GGNRA's preferred alternatives may or may not result in increased numbers of visits or a broader variety of visitors overall. The DEIS does not detail any statistical or other evidence for the assertion that people are dissuaded from using GGNRA lands in general due to the presence of off-leash dogs. I specifically object to the implication that racial, gender-based, age-based or class-based complaints led directly to the GGNRA proposed rule change. If GGNRA intends to make such assertions in a public document, statements must be on the record, at minimum generally attributed, and accompanied by relevant demographic details. Similarly anecdotal evidence from regular dog walkers regarding frequency of visits would be strongly to the contrary, and no doubt can be substantiated if needed.

I see disabled visitors to Fort Funston rolling in wheelchairs or using walkers on paved trails to walk their dogs on a regular basis. Such use does not appear to be curtailed by the presence of scores of off-leash dogs in close proximity. To the contrary, the presence of other dogs and their people appears to energize such visitors, and encourage them to participate in recreation. It is clear, with my dog, that seeing and greeting such visitors sensitizes her to the fact that people are all shapes and sizes, and all are entitled to respect.

If the purpose of the DEIS is to establish a precedent to reclaim urban-adjacent areas to wildlife habitat, GGNRA must state that purpose. Reversion to habitat precludes most recreational uses, including hang gliding, horseback riding, cross country running, and cycling, none of which are subject to restriction proposals in the DEIS.

Wrong Standard

The assertions proffered in the GGNRA DEIS regarding traditional off-leash dog walking areas fail to note the realities of open spaces in close proximity

to urban areas. Most of the locations proposed for more restrictive dog policies include amenities such as water fountains for dogs and people, garbage bins and plastic bag dispensers, paved or unpaved trails, installed steps or rock buffers too steep for most casual walkers, benches, parking lots, and public restroom facilities. Those indicia are not compatible with the express and implied intent to convert to restricted use disallowing off leash dog walking or outright bans on dogs. GGNRA proposes to promote and enhance natural areas preservation and restoration in locations where the existing and probable future population, including companion animals, is already established. The aims of GGNRA in specific areas which are already subject to multiple uses, including high frequency, high volume off leash dog walking, omit and summarily dismiss the recent history and recreationally beneficial impact of such uses, and are therefore misleading as presented in the DEIS. I submit that the GGRNA lands frequented by off-leash dogs and their people are safer and more welcoming to park visitors in general than areas that are more desolate and offer fewer amenities. For those who wish to encounter nature on her terms, the National Park Service is world renowned for maintaining and protecting land for that purpose.

Conclusion

The GGNRA now encompasses many miles of shoreline that were granted to its supervision by municipalities and local jurisdictions with the expectation that the future uses of those lands would be preserved for, and enjoyed by, generations to come. Improvements to those lands have resulted in one of the outstanding examples of urban parks anywhere, in terms of accessibility, variety, and scope.

This letter commends GGNRA for stewardship of some of the most valuable real estate in the world. My objection is limited to the recurring, and misguided, efforts to restrict the access of a longstanding and dedicated population of park visitors who visit specific areas for the specific purpose of walking their dogs off leash. That opportunity is a privilege and a premise of living in a region where quality of life is of utmost importance. It is an opportunity freely shared with all who visit for similar reasons. Please retract the proposed changes to dogs in the park, and work with interested parties to ensure that all who visit may enjoy their time at the GGNRA.

Thank you for your attention.

Respectfully, K. Lu San Francisco, CA

Cc: Supervisor John Avalos, San Francisco Supervisor Scott Weiner, San Francisco Minority Leader Congresswoman Nancy Pelosi, San Francisco US Senator Barbara Boxer US Senator Dianne Feinstein Crissy Field Dog Walkers Fort Funston Dog Walkers Eco-Dog SFDog

Correspondence ID: 3774 **Project:** 11759 **Document:** 38106

Received: May,29,2011 14:36:42

Correspondence Type: Web Form

Correspondence: May 29, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean,

My husband and I have lived in the Cow Hollow area of San Francisco for the past fifteen years. We have three very active children, and I must say that bringing them up without a backyard would have been a challenge if it were not for the Golden Gate Recreation Area. At least 4-5 days per week we get our exercise by walking our dogs at Chrissy Field, Fort Funston and other areas. It has become a healthy and bonding family tradition to walk, talk and hike with our dogs. It is such an integral part of our week, it would be devastating to see it end.

I guess you could say that we could leave the dogs at home, but that is ostensibly the reason why we walk. They are happier and healthier, and so are we.

It is essential for the GGNRA to consider reasonable alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS implies that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are most often the best stewards of our environment. Further, the proposed broad limitations in the DEIS are largely without site-specific science that demonstrates that the perceived degradation of the quality of the GGNRA's natural resources are actually attributable to dogs vs. other factors.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Christopher & Jane Cook

CC: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives
Ken Salazar, Secretary of Interior
Jon Jarvis, National Park Service Director

Correspondence ID: 3775 **Project:** 11759 **Document:** 38106
Received: May,29,2011 14:47:20
Correspondence Type: Web Form
Correspondence: Please don't limit of dogs in the park. It helps the community if people and dogs can get exercise. It's not time to start limiting outdoor options. People are more treating dogs like members of the family and it's nice to have all the family on a hike.

Correspondence ID: 3776 **Project:** 11759 **Document:** 38106
Received: May,29,2011 14:54:19
Correspondence Type: Web Form
Correspondence: Hi, I feel a responsibility to all the dogs and dog people I know to speak up on the GGNRA management plan currently under consideration. The only place still available for walking dogs off leash anymore in this area (Pacifica) is Fort Funston. That is still quite a drive, but people go because there really are no other legal choices. The prospect of losing Ft. Funston, to what sounds like a glorified enclosure, is really frustrating and heartbreaking. Dogs need to run to be healthy and happy. Furthermore, it seems logical that having dogs is a healthful commitment emotionally and physically for people. In this day, when exercise is in the forefront of a healthful lifestyle, dog walking is a happy possibility for urban dwellers. To say that these few places currently available for dog walking are for dogs is inaccurate; they are most certainly for the people who love dogs. The people I have observed at Ft. Funston are unfailingly responsible about curtailing their dogs' behavior and messes. We also show our appreciation for having this great area by having clean up days to maintain plants and debris on a regular basis. People, without dogs, can walk just about anywhere and there are an abundance of options for them. We do live in a beautiful area just

loaded with nature's opportunities. I am so hopeful that this process is still open to new ideas and solutions and not a "done deal". I really believe that it will be a big step backward for what is normally a fair-minded and forward thinking area--San Francisco. Sincerely, Alice Garibaldi

Correspondence ID: 3777 **Project:** 11759 **Document:** 38106

Received: May,29,2011 14:57:36

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

My name is Jeff Ubersax, age 36. I have lived in San Francisco for 14 years and have lived in the Inner Sunset for the past 13. I received my Ph.D. in Biochemistry and Molecular Biology from UCSF. I am currently an employee of Amyris as a Scientist where we are working to make renewable chemicals, drugs, and biofuel to displace petroleum usage. I am a current or former member of REI and the Sierra Club and consider myself an environmentalist.

I have a well trained and well behaved dog and have enjoyed walking him off leash at Crissy Field and Fort Funston for several years. We go to Crissy Field 3 times a month and Fort Funston one time a month. We have also occasionally gone to Muir Beach and Rodeo Beach. I have always cleaned up after him and kept him from going into restricted areas such as the tidal marsh or dunes of Crissy Field, the habitat restoration areas along the sand ladder at Fort Funston, and the lagoons at both Muir Beach and Rodeo Beach.

Prior to being a dog owner, my wife and I visited Crissy Field and Fort Funston a few times every month. We enjoyed walking along the beach and taking in the beautiful scenery and watching other people's dogs run and play off leash. Watching dogs run and play off leash was a major reason for us going to these two areas and added greatly to the recreational value of them. The current DEIS has not taken into account the fact that many people who are not dog owners, including many of my friends and family in San Francisco, gain significant recreational enjoyment from watching dogs run off leash in these areas.

The GGNRA is located in and adjacent to a large urban center. Much of the land is no longer in a pristine native state. I applaud and support efforts to restore the GGNRA to a more native state, as has been done at the Crissy Field tidal marsh. That said, much of the areas around Fort Funston and Rodeo Beach have been highly impacted by military use. The military planted large amounts of ice plant to stabilize the sand dunes at Fort Funston and Rodeo Beach. Parts of the DEIS that treat these areas as pristine

wilderness are misguided.

The DEIS makes a number of general statements about the negative impact of dogs. The DEIS fails to present any site specific evidence of these impacts caused by dogs on soil, vegetation, and wildlife. The DEIS needs to show evidence that dogs have negative impacts on site specific soil, vegetation, and wildlife to justify restrictions on dog activity. The DEIS is full of possible impacts of dogs on wildlife and vegetation and other visitors that 'could' occur, but there is little evidence that these impacts do occur. The DEIS should base it's management plan of actual observed impacts.

The DEIS fails to note that there is conflicting scientific evidence about the impacts of dogs on birds and vegetation. There is no scientific consensus that restrictions on off-leash dogs are needed to protect wildlife and vegetation. Forrest and Cassidy ST. Clair (2006) and Warren (2007) show that there is little to no impact of off-leash dogs on bird diversity, abundance and feeding. The DEIS needs to test the hypothesis that off-leash dogs are harmful to these sites before it can justify further restrictions.

There is evidence that humans alone and humans with leashed dogs have greater impact on the environment. Knight and Miller (1996, Wildlife responses to pedestrians and dogs) shows that the flush distance of birds is greater for human or humans with leashed dogs than unleashed dogs. This suggests that the birds in this study view humans as more of a threat than dogs. The DEIS needs to present a balanced view of the scientific literature and as there is no consensus about the impact of off-leash dogs, site specific studies should be carried out. It is often very difficult to differentiate the impact of dogs vs humans in an area. The raw data in the studies presented in the DEIS often shows that the conclusions reached in those studies and in the DEIS are not supported by the data.

My own observations suggest that humans have a bigger impact on many of the areas sited in the DEIS. I have seen far more people and children climbing and degrading the cliffs at Fort Funston than I have seen dogs. The DEIS should observe and report of the frequency of violations by people vs. dogs.

The DEIS suggests that dogs are the main driver of complaints by visitors. Complaints about the smell of urine around the batteries of Fort Funston have no evidence that those smells are coming from dog urine. In my many visits to Fort Funston and the marine headlands (Battery Rathbone), there has been the smell of urine around old batteries. There have also been beer cans and cigarette butts in the area. I find it much more likely that the smell of urine is from human urine rather than dog urine, especially as there are dramatically fewer dogs at Battery Rathbone than at Fort Funston.

Problem interactions between park visitors and off-leash dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA. Visitor fears of being attacked by an off-leash dog are fears based on emotion, not empirical evidence. The vast majority of citations in the GGNRA are leash law violations or being in closed or restricted areas and did not reflect any safety issues between dogs and park visitors. It is unfair to restrict a class of users from the GGNRA based on the irrational fears of another class of users. The GGNRA should focus on enforcement on the small number of people whose dogs misbehave, not on excluding the entire class of users.

The preferred alternatives listed in the DEIS assume 100% compliance when judging their impact. The DEIS assumes non-compliance with current rules and regulations when looking at the no-action plan. The DEIS should be comparing apples to apples and look at the impacts of the no-action plan with 100% compliance and enforcement. I strongly believe that better visitor education and better signs can dramatically increase compliance and reduce negative impact under current rules. Furthermore, the DEIS states that it will cost nearly \$1 million dollars to enforce the Preferred Alternatives but does not consider how the addition of more money to enforce the no-action plan would change the outcome of that plan. The DEIS should consider how additional funding could help enforce current rules and how this would impact site specific areas.

The DEIS includes a compliance-based management strategy that says if there is non-compliance with restrictions imposed under the Preferred Alternative, the GGNRA will change the management of the area to the next more restrictive level. This change will be permanent with no chance to go back to less restrictive rules. This section must be removed from the final plan as it is not based on scientific evidence at all. There is no evidence that more restrictive rules will lessen the impact that dogs have on areas. Furthermore, there is no provision for public comment and federal courts have routinely told the GGNRA that they have to hold public meetings and take public comments before making such changes. Furthermore, compliance would not likely be monitored by independent and non-biased observers. This section of the plan should be removed.

I support the Alternative A plan (no change or no action) along with additional visitor education and enforcement. I believe that this plan will help bring together dog owners and the GGNRA. This plan best represents the original intent behind the GGNRA as a way to preserve open spaces for recreation.

Respectfully,

Jeff Ubersax San Francisco, CA 94122

Correspondence ID: 3778 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story, how the dog management plan will impact you if it's implemented, and what you've seen when you've been out at the GGNRA)

Correspondence ID: 3779 **Project:** 11759 **Document:** 38106

Received: May,29,2011 15:14:52

Correspondence Web Form

Type:

Correspondence: My dogs (many now deceased) have grown up at Fort Funston....it is their social life and mine. When it came time for me to buy a house in SF, I purchased a house in the sunset for the express purpose of being near to Fort Funston. In order for dogs and humans to be complete beings, they need contact, society and exercise.....San Francisco has very few off leash areas for dogs to exercise in. Please keep the intent and spirit of the 1979 pet policy in place. Without Fort Funston, there is no reason for me to remain in San Francisco

Correspondence ID: 3780 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Why do we destroy everything we touch?

Correspondence ID: 3781 **Project:** 11759 **Document:** 38106

ID:

Received: May,29,2011 15:23:39

Correspondence Type: Web Form

Type:

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I live in Pacifica, with my wife and our rescue mutt, Lucky. I walk my dog at the nearest GGNRA lands (Mori Point, Fort Funston) at least 5 times a week. I enjoy the outdoors, am a member of the Sierra Club, The Nature Conservancy, and donate to Peninsula Open Space Trust. I appreciate the open space available in the SF Bay Area and love that I can walk from my house and be in the hills overlooking the ocean in a few minutes.

I do not agree with the conclusions presented in the GGNRA's Draft Environmental Impact Statement (DEIS) and I don't agree with the suggested Preferred Alternatives because they severely restrict off leash dog walking and visitation by people with dogs in general within GGNRA lands.

It is important to keep the GGNRA open to people with their dogs and continue to allow off-leash dog walking in areas already open to people with dogs and off-leash walking as allowed in the 1979 GGNRA Pet Policy. I propose that you maintain current usage, your Alternative A.

The DEIS and the Park Service does not address the recreational, social, psychological, and health benefits of off-leash dog walking with the recreational lands with the GGNRA and the extreme negative aspects of the proposed Preferred Alternatives upon current visitors with dogs to the Recreational Areas. There are not current usage statistics included in the DEIS. If these statistics were included, they would demonstrate how adverse

the effects will be upon the large population of current visitors. The Park Service has information on current user populations with dogs and typical dog movement on and around paths, how far most dogs will travel off path. You choose to not to make this information publicly accessible. During a recent visit to Ft. Funston a park employee acknowledged that most of the visitors to Ft. Funston had dogs. It seems like you wish to reduce visitors to Ft. Funston since your Preferred Alternative will negatively affect most of the visitors to Ft. Funston. It seems obvious to me that the Park Service is not interested in the needs of most of the visitors to local Recreational Areas, even though Ft. Funston currently is serving it's highest and best use.

The DEIS does not present any original, long term research results conducted on GGNRA lands that demonstrates that people with dogs have a deleterious affect upon plants and wildlife more than expected of visitors without dogs. The use of the word "Could" is used many times in the DEIS. Dogs "could" stir silt up, "could" harass wildlife, etc, instead of attempting to study actions of visitors and reporting statistics of actual use, misuse, and its effects.

GGNRA lands are Recreational Areas to be used by the residents of the SF Bay Area and Region. GGNRA is not a destination National Park. It is my big back yard. These are local lands, often given to the GGNRA to permanently prevent development, not to restrict recreational use.

It is not correct to think and act as if people with dogs and wildlife/plant life are mutually incompatible. The DEIS presents scientific literature review that demonstrates that people with pets do not harm wildlife and that areas with dogs have more reported instance of wildlife. Anecdotal reports suggest that cliff swallows at Fort Funston abandon cliffs where dogs are excluded and move to dog friendly areas. Dogs may deter harassment by predators.

The SF Bay Area is not pristine, untouched wild areas. Excluding people with their dogs will not make a naturally balanced, evolved ecosystem on GGNRA lands. Excluding dogs will not cause Marin Headlands redwoods to regrow. Excluding dogs will not eliminate monocultures of ice plant and cape ivy in Marine Headlands.

I walk my dog, off leash, at Fort Funston and Mori Point Recreational Areas 7 times a week. Mori Point is a former gravel pit with severely compacted soil (DEIS soil report). It was transferred to the GGNRA to prevent development, not to restrict recreational uses. I walk from private property to less used trails at Mori Point, trails that will not be open to dogs in the Preferred Alternative. I object to the changes at Mori Point. Dog walking on less used paths reduces interactions between people who don't like dogs and dogs. Your trail eliminations at Mori Point forces everyone, regardless of

their specific use, to use the same single path regardless of their activity. If you were concerned with recreational uses and reducing conflicts, more paths would reduce potential conflicts.

I am also concerned that unlabeled paths currently at Mori Point and marked for "Realignment" will be eliminated. I hope "Realignment" is not Park-Speak for remove.

The New Lands dog policy eliminates most dog walking from existing Recreational areas and prohibits dog access in new lands. This is NOT multiuse resource planning.

The compliance based dog policy is designed to be punitive and is not designed to reward compliance nor does it link impact with use and changes in policy towards off leash dog walking.

In a weekend survey that I conducted a survey at Ft. Funston, at least 86% of cars entering the parking lot had dogs. Most of the recreational visitors to Ft. Funston will therefore be extremely negatively impacted by the preferred alternative at Ft. Funston. My wife is disabled. I will not be able to walk with my wife and our off leash dog, (or on leash dog) at Ft. Funston with your preferred alternative.

A proposed need for action stated in the DEIS is "without action, those resources and values might not be available by future generations." Ft. Funston is subject to tidal erosion, seasonal landslides because of rain, and wind driven sand movement. Coupled with rising ocean levels, Ft. Funston will not be around to be enjoyed by future generations. Your DEIS Preferred Alternatives will PREVENT CURRENT ENJOYMENT of traditional recreational areas by residents of the SF Bay Area, allowing it to wash into the ocean, unenjoyed by the majority of the current visitors.

It is imperative that the social and recreational needs of current residents and visitors be acknowledged and accommodated. Saving for future generations will do nothing for today's needs. If the Preferred Alternatives are implemented, no doubt in the future the statement from the future GGNRA will still be, "Save it and our values for future generations". So who gets to use the land? No one, apparently.

Much of the land was transferred to the GGNRA so in order to keep the land from development.. Development is the single biggest problem in residential areas. Because of high density populations, pressure is put upon vacant land to achieve its highest and best use. If the deed to the land is restricted to prevent development, then it becomes a discussion about how to arrive at the highest and best use. Removing a large population of visitors in a highly populated area is not good use. It ignores humans, the only reason for there

to be any public access. In the absence of humans nothing else matters

Sincerely,

Ted Garber, Ph.D. Pacifica, CA 94044

Correspondence ID: 3782 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I want to protect the GGNRA's natural resources, I believe options other than restricting dog-walking access should be considered first. I favor an approach that truly balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based on any documented impacts of non-compliance, just the mere fact that non-compliance occurs. Because it will change the status of areas from off- to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur. That violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be. It should be soundly rejected.

The DEIS fails to consider that the GGNRA serves a large metropolitan area. The purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the San Francisco Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to adequately address how the proposal affects "recreational" values for these local residents.

I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written (there is no evidence

in the DEIS to support the closures of beach access because of the presence of snowy plovers), and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Correspondence ID: 3783 **Project:** 11759 **Document:** 38106

Received: May,29,2011 15:50:28

Correspondence Type: Web Form

Correspondence: I write in support of adopting a Dog Management Plan for the GGNRA. National Park values must be maintained to a high standard that is consistent system wide. While I am supportive of many aspects of the Preferred Alternative, I have the following comments to offer:

Commercial dog walking should not be allowed. Commercial dog walking does not relate to the purpose and mission of our National Parks, provides no service or benefit to park users, has negative impacts on park resources and park visitors, and serves only for the capital gain of private enterprises at the expense of the American public.

Off-leash areas should be well defined and be contained by a physical barrier. ROLAs should be distinguished by physical barriers and adequate signage so that all park visitors can choose whether or not to enter the area.

Park visitors should be limited to one dog per visitor. With few exceptions, dog handlers are not capable of managing more than one off-leash dog at a time.

The proposed compliance percentage of 75% is too low. The expectation should be that non-compliance is a rare occurrence and the compliance strategy should reflect that in its standard. The standard of compliance should be the same as for any other park rule or law. An acceptable rate of compliance is somewhere near 100%.

Within San Francisco, the plan does not provide an adequate amount of hiking trails and picnic areas where visitors can enjoy a dog-free, National Park quality experience.

The dog management plan should include a means by which park visitors can easily and effectively report non-compliant behavior. Park visitors are sometimes reluctant to report observed violations due to the time involved in making the report. A public reporting system should be incorporated into the plan that will be user friendly and workable. Such a system should require only a few moments of time and be an effective documentation of the violation.

Correspondence ID: 3784 **Project:** 11759 **Document:** 38106

ID:

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: I walk my 2 dogs at Fort Funston where we get exercise and socialize with friends. My boston Terrier is a ball girl. She has to chase the ball. She loves being off leash and couldn't chase a ball on leash or get the exercise she and I both need. We love recreating and living in San Francisco. I have a high stress job as a registered nurse and don't know what I'd do with out a way to relieve stress like I do in parks and GGNRA near my urban home. We also go to Stern Grove and believe the it would be over crowed if Fort Funston was limited for off leash use. Sincerely, Melinda McMurray _

Correspondence ID: 3785 **Project:** 11759 **Document:** 38106

ID:

Received: May,29,2011 16:11:55

Correspondence Web Form

Type:

Correspondence: Thank you for so carefully considering how to best allow the public to use these magnificent resources.

Please make provisions for off leash dog use. I hike this area because I love it, and I am motivated to use it more because I have a dog who is WELL BEHAVED off leash. I think that is the crux of the matter A few ill mannered dogs (and owners who have not been responsible for properly training their dog/s) make access a problem for all dog owners. Don't make us all suffer for a few.

This is a recreation area, not a national park. I heard a radio interview by the park director and could hear in his voice that he was not inclined to make this an "exception" to national policy. However this is a local issue, in a densely populated area, and there are many people who will use it precisely because they have a dog.

The weather in many parts of the country does not allow for as much outdoor activity for so many people. Many more people use these recreation areas because they have dogs.

Lynn Fraley

Correspondence ID: 3786 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 29, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, I am writing to give you my feedback on the GGNRA draft dog management plan. I have been having alternating reactions reading the plan, one is that the NPS is working hard to justify removing dogs from the GGNRA. My second reaction is to just forget about giving feedback and start fighting to have the GGNRA removed from NPS control. I am hoping that in providing input to the dog management plan you will understand how so many people feel about the wonderful resource the GGNRA is for the people of the bay area and how dogs fit into people's lives.

Although I am not currently a dog owner most of my life I have been. I grew up in Marin County when the Marin Headlands and the Presidio were still active military bases. It was such a relief to us that when the bases were closed they were not developed into private use but instead became parks. I don't specifically recall when Fort Funston was turned over to San Francisco

and then later to the GGNRA, but I do know the intent was to keep the property from being closed off from the public. One of the things that makes the bay area such a great place to live is the parks with all their opportunities for outdoor recreation.

Even though the Bay Area is heavily populated it doesn't feel like we are living in an urban jungle because we had the foresight to keep open spaces close by. In Marin County that meant keeping west Marin designated as agricultural and open space. When the Army pulled out of the bay area it meant not building on the bases but instead opening them up for recreation. It wasn't until about 11 years ago when the park service without warning started closing areas of Fort Funston off to dogs that I realized the National Park Service controlled the GGNRA.

Since I have started to become involved in efforts to keep Fort Funston open to dogs my general impression of the way the NPS has approached the GGNRA is to return the properties into their wild state before people came to California. I know this is not the exact stated goal, but in reading through the Draft Dog Management Plan I realize that the park service does approach managing the GGNRA the same way it does places true wilderness like Yosemite and Yellowstone. The GGNRA is not wilderness and should not be treated as such.

Fort Funston means a lot to me. It is where I walked with my father and the family dogs. When my father was ill we were able to walk together at his pace while the dogs were able to run around. My father walked every day out at Fort Funston before he passed away. The regulars who go out there look out for each other. My dad was part of the early morning crowd that went out before work. When he needed help driving and I went out there at the crack of dawn with him I was amazed at how friendly everyone was. After his passing I continued to walk the dogs before work out there. I ALWAYS felt safe even when during the winter I was out there before dawn. I can't say that about someplace like Golden Gate Park or even my neighborhood park.

The constant stream of people with their dogs out there discouraged campers, all night teenage parties and homeless encampments. Every now and then someone would be out there but they never made Fort Funston a permanent home because there were people and dogs out there. A few years after my father passed I started going to Fort Funston after work since I didn't like getting up so early. I found another nice group of people out there. There were people who were on the same general schedule as me and I looked forward to seeing them and their dogs every day. Sometimes we would dog sit for each other. It is a great social environment out there.

I saw such a diverse mix of people out there. There was an older lady out

there regularly in a wheelchair being pushed by an aid. She would go as far as the water fountain and stay there for a while petting all the dogs. She seemed so happy to be out there visiting the dogs. On weekends whole families come out. The kids run around climbing trees while the parents toss a ball for the dog. Most city parks segregate dogs and kids so you can't take the dogs to the playgrounds. And that makes sense to me. However most people I know with kids also have dogs, just like the household I grew up in. I have been to enough dog parks to know that there isn't anything for kids to do there. So as a result places like Fort Funston and Chrissy Field become the only places people can go with their kids and dogs.

Recently while dog sitting I made a doggie play date with one of my friends who has a child and dogs. I met her and her husband and daughter and their two dogs out at Chrissy field. She was 8 months pregnant and her daughter was 18 months. So her hands were full. We were all able to hang out and play with the dogs and her daughter. Her dogs and the one I was sitting were able to play with other dogs and to chase the ball. There is no way we could have done this on leash. The east parking lot where we met was PACKED. The beach was full of others doing the exact same thing we were. Families out with their kids and dogs. Clearly there is a demand for this. She drove up from San Mateo to come to Chrissy field because the beach is perfect to this. The waves are not too big, the view is great and there are other dogs for her dogs to play with.

I do have a wonderful neighborhood park 5 blocks from my house, Cayuga Park. It has a playground, a tennis & basketball courts and a baseball diamond surrounded by a very beautiful garden. It is a great park sit in or play sports but it is really isn't a great place to give a dog good walk. When the dogs became senior citizens I reduced Fort Funston to maybe 4 times a week and walked Cayuga Park the other days. The great thing about going someplace like Fort Funston is I get a walk too. It's not like going to a dog park where I stand there trying to get my dog to run around. Going to Cayuga Park was basically a walk to and from the park because there isn't much walking to do once in there like at Fort Funston.

At Fort Funston I would park usually in the main parking lot and walk down the hill past the trail to the beach. It is a very nice loop with some variations we could take. Whenever I dog sit I take the dog out there. I have made so many memories of my late father and our departed dogs there. One of the very last things I did with my father was to go out to protest the closing of areas of the GGNRA to dogs at the Presidio Officers club. I believe that protest was one of the reasons that the GGNRA had to do a formal process to change the dog policy for the park.

At first I thought the process for proposed rule changes to the park were so that the GGNRA could change the NPS rules so that off leash dogs would

be allowed as the exception to NPS policy. It seems to me now that the Park Service is on some sort of mission to justify removing dogs from the park. I know there is a lot of acreage in the GGNRA, but the volume of documents produced in the report seems like it's meant to bury the issues. The worst of it is when I was at one of your information sessions looking over the map of Fort Funston it wasn't even accurate. The bunkers at the top of the hill have two tunnels. One has pavement up to the entrance the other doesn't. After all the time and effort on the report the maps are not even accurate.

I was also disappointed that areas like the Tennessee Valley trail in Marin were left out of the report. I was told this was because dogs are not currently allowed there. All GGNRA properties should have been in the report. The report should have been written describing how dogs are managed on ALL GGNRA property. The report should reflect the entire scope of the GGNRA property and truly reflect how many areas do and do not allow dogs. When you exclude an area you are exaggerating how much of the total acreage is open to dogs now and how much of a change you are making. That is another way the park service has allowed inaccuracies and bias to enter the plan.

I really do appreciate the efforts of people to protect nature. I wanted to be a park ranger growing up. I earned a Bachelors of Science in Environmental Biology from UC Davis. But I got frustrated by both the bureaucracy of government and the radical elements of the environmental movement and chose not to go into the field.

I really do think there is a way for people to enjoy the GGNRA and to protect nature and to allow dogs off leash. I actually see allowing dogs off leash is a way for people who would have resigned themselves to walking their dogs on city streets or just going to a dog park to get out and see nature and want to protect it. The more areas we open up to more people the more people will see that open space and wildlife should be protected.

Overall when I see people out at Chrissy Field or Fort Funston they don't like seeing trash on their walk. I know I am not the only one who picked up other peoples trash during my walk. We like seeing the hawks and swallows flying around. None of the responsible dog owners is going to let their dog do something harmful. I do realize there are some people out there who are not responsible owners. But there are people all over who don't behave responsibly. It seems unfair to punish all of us for something a few people might do.

There are plenty of things to disturb wildlife in a park in the middle of a city. For example when I have gone down to the beach below Fort Funston the dogs are generally playing in the water. Not climbing up the cliffs disturbing the bank swallows. However I do see kids climbing up the cliffs.

After the 4th of July I have seen evidence of people shooting off bottle rockets below the cliffs. There are many Crows out at Fort Funston and we all know they like to scavenge other birds' nests. At Lake Merced across from Fort Funston where some of the swallows feed there are two very loud shooting ranges. So how can the Park Service say that removing dogs is going to protect the Bank Swallow?

I firmly believe the GGNRA can accommodate both recreation and conservation. It was designed as an URBAN recreation area, not a pristine wilderness area like Yosemite. It should not be managed the same way. The courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. If the Park service cannot manage an urban park than maybe the GGNRA should be removed from the Park Service's control.

This plan disregards the health and well-being of people, dogs, and the community. It does not take account of the impact of removing dogs will have on other parks in the Bay Area. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I know there is no way for you to make all parties happy because there is such a vast spectrum of thought on how the GGNRA should be managed. However I would like to see the decisions made to be based on FACTS not some sort of anecdotal stories of about dogs in the park.

Sincerely, Carola Hamann San Francisco, CA 94112

Correspondence ID: 3787 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 29, 2011 Frank Dean, General Superintendent GGNRA Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I live in San Francisco and have since 1971, I live in Twin Peaks neighborhood. I'm a member of the Sierra Club. I have two dogs, a toy poodle, a boston terrier and I regularly enjoy wild life and exercising off leash at Fort Funston. I love the fresh air, the fog, the ocean, I used to ride my horse there but no longer have a horse.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I want to protect the GGNRA's natural resources, I believe options other than restricting dog-walking access should be considered first. I favor an approach that truly balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternatives as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based on any documented impacts of non-compliance, just the mere fact that non-compliance occurs. Because it will change the status of areas from off- to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur. That violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be. It must be removed.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form

of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written (there is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers), and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration.

Sincerely,

Melinda McMurray San Francisco, CA 94131

Correspondence ID: 3788 **Project:** 11759 **Document:** 38106

Received: May,29,2011 16:33:13

Correspondence Type: Web Form

Correspondence: To the Golden Gate National Recreation Area, I think the Dog Management Plan is too ambitious in terms of micro management. It's application and enforcement could lead a lot of cost and ill will from the public. I am not convinced that it is necessary. Hence, I believe Alternative A is best if the Plan has too be imposed. I have lived in the Bay Area 99% of my life. I am still there most of the time even though I have no legal address there right now. Yes, I do have a dog . She is 14 years old, so I probably won't have her much longer. I doubt I will get another. So the truth is , it's not really my business in a personal sense except that I think dog ownership can be a blessing and I don't want to see it messed up by too much regulation. Realistically, I think some changes are bound to occur. I think they are warranted regarding Professional Dog Walking at certain sites under your jurisdiction. However, I think Marin can regulate itself. If changes are going to be imposed, I want to comment on Muir Beach and Baker Beach and Rodeo Beach. I think Muir Beach, on the beach area should allow off leash , voice control because it is a part of the local lifestyle. That is Alternative A. Muir Beach has always been an important destination for the free spirited Marin lifestyle. I don't think the National Park Service should kill the feel of the beach with more rules. I think the least the change , Alternative A, should also be applied at Rodeo Beach. It's a nice big place with plenty of room on the beach for all. Baker Beach on the other hand is more urban so realistically the possibility of stupid behavior is more acute. Therefore, I

think the beach should be split into portions for on leash, off leash and no dogs. That is Alternative A also. I want to thank the Golden Gate National Recreation Area for the opportunity to comment on this Plan. Obviously, a lot of time, effort and expense has gone into this proposal. From what I have looked at it is balanced. I think that future changes in the Golden Gate National Recreation Area should be based on this document and applied on a case by case basis as the need arises, rather than at one fell swoop.
Sincerely, John C. Williams

Correspondence ID: 3789 **Project:** 11759 **Document:** 38106

Received: May,29,2011 17:07:15

Correspondence Type: Web Form

Correspondence: Dear NPS,

I am a longtime resident of San Francisco, and frequent visitor of the GGNRA together with my husband, our baby, and our dog, Angus. We run and walk to and around Crissy Field at least several times a week, and visit Rodeo Beach and other areas of the GGNRA in Marin on weekends. Also, on weekday mornings, while my husband and I are working, Angus visits Fort Funston and other GGNRA spots with his wonderful dog walker, Rodrigo. We live in a small flat and rely on the amazing outdoor resources San Francisco has to offer for our own and our dog's quality of life. I have been visiting the same beloved spots in the GGNRA for nearly 30 years, always with my dogs. Were it not for the great resources in such close proximity to our urban setting, my family would likely not have dogs, or else would choose to live elsewhere. Having dogs and being able to give them a good quality of life ? including giving them regular outdoor free play ? is a significant part of our daily family experience and happiness.

I am also, in my professional life, an environmental planner. I have a master's degree in marine environmental management and am passionate about environmental protection. I have read many environmental review documents (both EISs and EIRs) in my career. I read much of the Dog Management Plan Draft EIS and, beyond my disagreement with the proposals provided in the document, I was incredibly disappointed by the quality of the document. Generally speaking, I had four major concerns:

1. There was a woeful lack of substantiation (scientific evidence or other documentation) to many claims made in the document. The document needs to be carefully reviewed and revised to ensure all statements are backed up by adequate references, or else that the statements in the document are revised.

2. The authors of the document clearly did not have a good grasp on the

experience of local residents using the GGNRA, or give the reader much context of the dense urban setting that surround the GGNRA. The document should be revised to include the experiences of local residents as well as much better characterization of the local setting (i.e. the urban environment). In my personal experience in the areas that I visit almost daily in the GGNRA, conflicts with dogs very rarely occur, dog walkers are extremely respectful, and dogs are generally very well behaved. While incidents may occasionally occur (though I have never witnessed an incident in my many years of visiting the park), there is no clear evidence presented in the document of a major issue. It would certainly be a shame to manage to the lowest common denominator.

3. There was very little creative thinking evident in terms of management approaches that could both address any real issues whilst still providing off-leash dog opportunities (i.e. planting/creating natural barriers around the Wildlife Protection Area near Crissy Field rather than so simply proposing a ban on off-leash dogs, increasing educational outreach in areas of special sensitivity). The lack of creative management approaches gave the impression that the NPS does not care about residents' values, and that they simply want to manage this urban park like other national parks. I sincerely hope this is not the case, and suggest that the document needs to be revised to include more nuanced management approaches that do not involve banning off-leash dog walking.

4. Finally, most importantly (and most appallingly!) there was a complete lack of analysis regarding recreational resources in the urban setting of the San Francisco Bay Area. NEPA requires that environmental impacts on the quality of the human environment be considered. They were not at all adequately considered in the draft document. The revised EIS should consider the human environment and recreational resources as a critical element in selecting the environmentally preferable alternative. The proposed alternative would have a significant impact on my quality of life, and many others.

Also, a minor comment, but one worth noting: the term "commercial dog walkers" does not properly characterize these individuals. The term implies a large-scale and impersonal operation; the reality is most of these individuals have small-scale operations providing dog-walking services to working families. Please, modify the term "commercial dog walkers" globally throughout the document to "professional dog walkers." Thank you.

While I am strongly in favor of protecting our natural resources, in an urban environment, it is also important to acknowledge other values and provide a balanced approach to management. I believe there is a way to honor both the needs of families with dogs and the needs of wildlife. Please carefully consider in the revised document how this can be done better. After all, in

the bigger picture of environmental protection, we should be encouraging densification of urban areas (i.e. less sprawl), and continuing to provide urban residents the type of resources we have in the GGNRA to maintain their quality of life. If these beloved resources are so altered that they cannot be enjoyed by families with dogs, many of us may move farther afield.

Please honor the mission of the GGNRA, which is to promote not only natural but also the recreational values of the park, and revise the EIS accordingly. Angus, my family, and so many others depend on the continued enjoyment of our resources.

Best, Antonia Sivyer

Correspondence ID: 3790 **Project:** 11759 **Document:** 38106

Received: May,29,2011 17:09:23

Correspondence Type: Web Form

Correspondence: I am a supporter of the GGNPC and believe that by and large those in charge of making the Presidio almost financially self sufficient w/o over commercializing it have done an excellent job. So it wonders me that the abominable "Ditch the Dog? plan could have been produced under its auspices. Dogs have very limited off leash range at Crissy Field, Fort Funstan and Ocean Beach as it is. Those who do not care to share space with dogs have vast options as to how to avoid them. So why the time, expense and trouble to create a 1400 page indictment of the most loving creatures on earth? It makes me wonder who appointed the perpetrators of the task force who wrote it and what the appointment criteria was.

I have always had dogs and they have never given me or others trouble. I am now 84 and too old to adopt another since my last one died. Therefore I get my dog fix by visiting Crissy Field or the superb "Dogs are welcome" beach at Carmel and I find the dogs invariably friendly and heart warming to watch as they happily romp about their limited space. Above all
REMEMBER THAT THE PARKS ARE FOR EVERYONE as well as plants, birds, man's best friends not just for those who don't choose to share public space with dogs.

Raymond Barrier

Correspondence ID: 3791 **Project:** 11759 **Document:** 38106

Received: May,29,2011 17:10:26

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean,

I support the efforts to develop new rules for dog walking on GGNRA lands. I believe that increased restrictions on dog walking in Marin County is vital in order to protect our sensitive park lands and the animals that live there.

As an avid hiker, I am disgusted by the "doggie bags" that litter the sides of trails. I invariably run into dogs who are off leash with the owner not in control of their pets. This is disconcerting to a solitary walker like myself. I'm in favor of the nationwide federal regulation that does not allow off-leash dog walking on NPS lands. However, knowing that this will never happen here in Marin I would support Alternative D for Muir Beach and Alternative C for Oakwood Fire Road in Tennessee Valley and the northern portion of Rodeo Beach with Alternative B for all other areas.

I understand the constraints on the NPS to manage the park lands. I find it sad that the park staff also has to confront hostile people when they try to issue citations or remind the public of the rules regarding dog walking.

Thank you, Adi De Sanna-Girroi

Correspondence ID: 3792 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am submitting my comments on the DEIS in opposition to the proposed plan. I support the No Action alternative along with better enforcement and education of the current rules and regulations.

I live in San Francisco and use the GGNRA areas with my Labrador retriever on a daily basis. I primarily use Crissy Field, Baker Beach, and Rodeo Beach/Fort Conkrite/Miwok Trail areas. I am an environmentalist in my own right and have been involved personally in major conservation land transactions and plans along with being on a board of directors of a land conservation organization, so I am well aware of the balance of preservation, protection, and conservation along with public recreation. All lands and areas need both, and based on my observations and use, I see adequate protections of the environment in place in the GGNRA areas. Instead of making new rules and adding restrictions, the current rules and regulations should be enforced and used to educate the public.

Like the vast majority of dog owners using the GGNRA areas, I keep my dog under voice and sight control, clean up after him and keep him out of the restricted posted areas. It is important to keep these areas open for off leash dog walking access, especially in an area like the Bay Area with a

large population.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site specific conditions. The GGNRA's mission applies equally to new lands as existing lands and it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands.

I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options (besides restricting dog-walking access) should be considered first. For example, it is not clear where dogs are allowed. I think the GGNRA should provide better signage and create environmental barriers, such as the vegetative barriers surrounding the tidal marsh at Crissy Field or the restored dunes at Fort Funston.

The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. I wish that the DEIS would include an alternative along these lines.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site-specific information that these areas are inappropriate for continued dog walking.

Once, again, I am writing in opposition to the preferred alternate, and in support of the No Action plan.

Correspondence ID: 3793 **Project:** 11759 **Document:** 38106

Received: May,29,2011 17:27:21

Correspondence Type: Web Form

Correspondence: As a frequent user of the Presidio and other areas of the GGNRA, I heartily support improved management of dogs in the park.

Today I was walking and 2 huge Great Danes off leash ran up to me barking. Although it turned out, they were "friendly", I was unnerved by the incident, especially since 2 friends recently have been bitten by off leash dogs in the Park.

I strongly support the the folowing: Commercial dog walkers should be limited to very specific, clearly marked areas. They should be limited to 4 ON-LEASH dogs, the most one person can truly manage Commercial dog walkers should pay a fee to receive permits to use the GGNRA (the same as any other vendor). The funds generated would help cover costs of plan implemntation On-leash areas should be clearly marked

Individuals or companies should be ticketed for not obeying the policies

Establishment of clear policies and enforcement are critical to maintaining the health and safety of all park users, as well as the wildlife and plants that make our GGNRA so special.

Correspondence ID: 3794 **Project:** 11759 **Document:** 38106

Received: May,29,2011 17:38:44

Correspondence Type: Web Form

Correspondence: Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Correspondence ID: 3795 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 29, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

My name is Lisa-Anne Manolius. I am a San Francisco resident, a professional certified dog trainer and a dog guardian. I take my dog to GGNRA off-leash areas at least 3 times a week, most often Fort Funston, Ocean Beach or Crissy Field. I am a dedicated dog and animal advocate who cares very much about the environment. I have regularly donated to the World Wildlife Federation, the Environmental Defense Fund and the NRDC. I also happen to be a member of a minority group; I am a US naturalized citizen who was born and raised in Jamaica, and am part Asian and part Black.

The human-animal bond is very important to me. As a responsible dog guardian, I keep my dog under voice and sight control, clean up after him, and keep him out of the fenced dunes and vegetative areas. It is important for dog guardians and me that areas like Fort Funston, Ocean Beach, Crissy Field and other GGNRA lands remain open for off leash dog walking access.

I do not agree with the GGNRA's current preferred alternative, as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site specific conditions.

I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options (besides restricting dog access) should be considered first, such as better signage and environmental barriers to demarcate areas where dogs are and aren't allowed.

As a responsible dog guardian and animal advocate I know it is crucial that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment. Adequate off-leash exercise and socialization are essential for a well-behaved dog. Having places where I can take long walks with my dog allows me to get the exercise I need while also meeting my dog's physical and behavioral needs. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dogs and dog guardians will not have sufficient opportunity to exercise and recreate, a serious problem for dogs, their owners and City residents without dogs.

The DEIS includes the following problems and errors: ? Neither the DEIS nor the Plan recognize that environmental values include both recreation and

nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The DEIS doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

? The GGNRA has a recreation mandate and the DEIS treats recreation as an adverse impact, rather than a value to be preserved. There are more dogs than children in San Francisco, approximately one dog for every 7 City residents. The DEIS ignores the significant life-quality enhancement that dog guardians like me derive from recreating with their dogs. Spending recreational time with my dog is a time of peace, reflection and bonding in the beauty of nature that GGNRA lands provide. There are simply no other opportunities for a remotely similar recreational experience in the crowded urban environment of San Francisco.

? The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. That could not be further from the truth. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

? The Plan effectively punishes many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. The DEIS should include an alternative along these lines.

? The proposed "compliance-based" approach should be modified to create a baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

? The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the severe restrictions of the preferred

alternative. Further, there is insufficient documentation that considers other impacts ? e.g., other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. Not once have I seen a dog disturb birds' nesting places on GGNRA lands, or harm wildlife.

? The DEIS fails to consider the significant negative environmental effects of the Plan on the San Francisco Bay Area. The Plan will have significant impacts on all Bay Area residents, whether they own dogs or not. The Plan will result in further overcrowding of City parks, which are already heavily used, and many of which are too small to reasonably accommodate the current numbers of dog that frequent them. Overcrowding will naturally diminish park goers' enjoyment of the park experience. City parks will suffer environmental damage that naturally accompanies overuse of lands. City taxpayers will ultimately bear the financial burdens of park overuse.

? The DEIS fails to consider the harmful behavioral effects on Bay Area dogs. The Plan will result in insufficient exercise and socialization for countless numbers of City dogs, which in turn will cause humans to suffer negative environmental impacts. Dogs that don't get enough off-leash exercise and socialization display a host of undesirable behaviors including excessive barking (noise pollution) and increased stress, anxiety, fear and aggression. The latter puts the public who encounter such dogs at risk.

? The GGNRA is in a dense urban area, yet the DEIS is written as if the Bay Area and its residents don't exist just outside its boundaries. This is an urban area, not a pristine wilderness. The DEIS ignores the significant impacts on residents and area resources, especially city parks if restrictions take effect. The SF Board of Supervisors passed a resolution opposing the Preferred Alternative because of the lack of study of impacts on city parks.

? The DEIS does not consider impacts on the physical and mental health people will suffer if dog walking is severely restricted. The DEIS also does not consider impacts on social communities of people with dogs at GGNRA sites if the plans take effect. I derive many benefits from walking my dog in GGNRA off-leash areas ? my physical health benefits from walking and playing with my dog, my stress and anxiety are reduced, and I have opportunities to meet and socialize with friends who also have dogs. If the GGNRA's Plan takes effect, I will have no similar opportunities to do these things in San Francisco.

? The DEIS is full of assumptions about impacts ? things that "might" or "could" happen ? but there is no evidence of actual observed impacts. It is

wrong and unfair to base management plan on hypotheticals. The GGNRA has had years to observe and document actual observed impacts. The fact the GGNRA did not include them in the DEIS indicates they don't exist. I have NEVER in 4 plus years seen a dog attack a person at GGNRA lands, dogs attacking one another or dogs disturbing any birds' nests/burrows.

? The DEIS claims a major safety problem with dogs in the GGNRA, but the GGNRA's own data indicates dogs accounted for only 2% of serious safety incidents involved dogs. The vast majority of serious incidents involved people only. Even if only non-serious incidents are considered, dogs accounted for a mere 7% of incidents in the GGNRA. Dogs are not a major safety problem. I worry about threats from other humans on trails, not from dogs, and feel infinitely safer on a deserted trail with my dog than without.

? Dog walkers constitute the most diverse group of people who use the GGNRA ? seniors, kids, people with disabilities, gay and straight, all ethnic groups, all religions, all social and economic classes ? all interacting in positive ways, bound by their common love of dogs. There is no mention of this diversity in the DEIS. Minorities are mentioned only in the context of being afraid of dogs. As a member of two racial minorities and one ethnic minority, I object to that characterization. It's simply untrue. The DEIS incorrectly quotes from a focus group of people who had largely never been to the GGNRA as proof that minorities don't come to the GGNRA because of the dogs.

? The DEIS uses misleading literature citations to claim dogs have negative impacts on wildlife and the environment. When examined closely, many of these studies do not support the DEIS' claims. Claims of impacts on snowy plovers and bank swallows are not supported by available data. The DEIS must start over and study actual impacts documented to occur at each site in the GGNRA, and must consider whether there are simpler mitigations that can address any impacts that are actually found.

? The DEIS does not consider simple management tools that could be added to the 1979 Pet Policy that could alleviate concerns without needing to ban people with dogs. For example, if concern is dogs going over cliffs at Fort Funston, a low-lying fence near the cliff and better signage could keep people and dogs away from the cliff. Education programs to socialize dogs to horses could help reduce negative interactions between horses and dogs on trails.

? The DEIS considers dogs as if they are the only animal species with possible impacts in the GGNRA. There is no discussion of impacts of natural predators on snowy plover birds and how that compares to those from dogs, or how do human disturbances compare to disturbances from

dogs. Without this context, the DEIS cannot say restricting dogs will have a significant positive impact on species.

? The DEIS did not consider negative impacts on dog behavior caused by severe restrictions on off-leash in the GGNRA and by resulting overcrowding in city parks. Expert dog trainers and behaviorists, including Dr. Ian Dunbar, Trish King, Jean Donaldson, concur that the loss of off-leash exercise will cause an increase in problem dog behaviors, including bites. This resulting increase in problem behaviors will lead to an increase in surrenders at city shelters, which cannot handle the increase. This is another impact on surrounding communities that was not considered in the DEIS. The SF Animal Control and Welfare Commission held a hearing on this and passed a resolution calling on the Board of Supervisors to oppose the Preferred Alternative because of that.

I support Alternative A, the No Action alternative, and would also include the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra) in San Mateo county.

Respectfully,

Lisa-Anne Manolius, JD, CTC, CPDT-KA San Francisco, CA 94131

CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Correspondence ID: 3796 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 29, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

My name is Kimon Manolius. I am a San Francisco resident and a responsible dog guardian. I take my dog to GGNRA off-leash areas at least twice a week, most often Fort Funston or Ocean Beach. I also consider myself an environmentalist and give regularly to wildlife and environmental

preservation and conservation groups.

The human-animal bond is very important to me. As a responsible dog guardian, I keep my dog under voice and sight control, clean up after him, and keep him out of the fenced dunes and vegetative areas. It is important for dog guardians and me that areas like Fort Funston, Ocean Beach, Crissy Field and other GGNRA lands remain open for off leash dog walking access.

I do not agree with the GGNRA's current preferred alternative, as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site specific conditions.

I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options (besides restricting dog access) should be considered first, such as better signage and environmental barriers to demarcate areas where dogs are and aren't allowed.

As a responsible dog guardian and animal advocate I know it is crucial that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment. Adequate off-leash exercise and socialization are essential for a well-behaved dog. Having places where I can take long walks with my dog allows me to get the exercise I need while also meeting my dog's physical and behavioral needs. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dogs and dog guardians will not have sufficient opportunity to exercise and recreate, a serious problem for dogs, their owners and City residents without dogs.

The DEIS includes the following problems and errors: ? Neither the DEIS nor the Plan recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The DEIS doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

? The GGNRA has a recreation mandate and the DEIS treats recreation as an adverse impact, rather than a value to be preserved. There are more dogs than children in San Francisco, approximately one dog for every 7 City residents. The DEIS ignores the significant life-quality enhancement that dog guardians like me derive from recreating with their dogs. Spending recreational time with my dog is a time of peace, reflection and bonding in the beauty of nature that GGNRA lands provide. There are simply no other

opportunities for a remotely similar recreational experience in the crowded urban environment of San Francisco.

? The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. That could not be further from the truth. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

? The Plan effectively punishes many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. The DEIS should include an alternative along these lines.

? The proposed "compliance-based" approach should be modified to create a baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

? The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the severe restrictions of the preferred alternative. Further, there is insufficient documentation that considers other impacts ? e.g., other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. Not once have I seen a dog disturb birds' nesting places on GGNRA lands, or harm wildlife.

? The DEIS fails to consider the significant negative environmental effects of the Plan on the San Francisco Bay Area. The Plan will have significant impacts on all Bay Area residents, whether they own dogs or not. The Plan

will result in further overcrowding of City parks, which are already heavily used, and many of which are too small to reasonably accommodate the current numbers of dog that frequent them. Overcrowding will naturally diminish park goers' enjoyment of the park experience. City parks will suffer environmental damage that naturally accompanies overuse of lands. City taxpayers will ultimately bear the financial burdens of park overuse.

? The DEIS fails to consider the harmful behavioral effects on Bay Area dogs. The Plan will result in insufficient exercise and socialization for countless numbers of City dogs, which in turn will cause humans to suffer negative environmental impacts. Dogs that don't get enough off-leash exercise and socialization display a host of undesirable behaviors including excessive barking (noise pollution) and increased stress, anxiety, fear and aggression. The latter puts the public who encounter such dogs at risk.

? The GGNRA is in a dense urban area, yet the DEIS is written as if the Bay Area and its residents don't exist just outside its boundaries. This is an urban area, not a pristine wilderness. The DEIS ignores the significant impacts on residents and area resources, especially city parks if restrictions take effect. The SF Board of Supervisors passed a resolution opposing the Preferred Alternative because of the lack of study of impacts on city parks.

? The DEIS does not consider impacts on the physical and mental health people will suffer if dog walking is severely restricted. The DEIS also does not consider impacts on social communities of people with dogs at GGNRA sites if the plans take effect. I derive many benefits from walking my dog in GGNRA off-leash areas ? my physical health benefits from walking and playing with my dog, my stress and anxiety are reduced, and I have opportunities to meet and socialize with friends who also have dogs. If the GGNRA's Plan takes effect, I will have no similar opportunities to do these things in San Francisco.

? The DEIS is full of assumptions about impacts ? things that "might" or "could" happen ? but there is no evidence of actual observed impacts. It is wrong and unfair to base management plan on hypotheticals. The GGNRA has had years to observe and document actual observed impacts. The fact the GGNRA did not include them in the DEIS indicates they don't exist. I have NEVER in 4 plus years seen a dog attack a person at GGNRA lands, dogs attacking one another or dogs disturbing any birds' nests/burrows.

? The DEIS claims a major safety problem with dogs in the GGNRA, but the GGNRA's own data indicates dogs accounted for only 2% of serious safety incidents involved dogs. The vast majority of serious incidents involved people only. Even if only non-serious incidents are considered, dogs accounted for a mere 7% of incidents in the GGNRA. Dogs are not a major safety problem. I worry about threats from other humans on trails, not

from dogs, and feel infinitely safer on a deserted trail with my dog than without.

? Dog walkers constitute the most diverse group of people who use the GGNRA ? seniors, kids, people with disabilities, gay and straight, all ethnic groups, all religions, all social and economic classes ? all interacting in positive ways, bound by their common love of dogs. There is no mention of this diversity in the DEIS. Minorities are mentioned only in the context of being afraid of dogs. As a member of two racial minorities and one ethnic minority, I object to that characterization. It's simply untrue. The DEIS incorrectly quotes from a focus group of people who had largely never been to the GGNRA as proof that minorities don't come to the GGNRA because of the dogs.

? The DEIS uses misleading literature citations to claim dogs have negative impacts on wildlife and the environment. When examined closely, many of these studies do not support the DEIS' claims. Claims of impacts on snowy plovers and bank swallows are not supported by available data. The DEIS must start over and study actual impacts documented to occur at each site in the GGNRA, and must consider whether there are simpler mitigations that can address any impacts that are actually found.

? The DEIS does not consider simple management tools that could be added to the 1979 Pet Policy that could alleviate concerns without needing to ban people with dogs. For example, if concern is dogs going over cliffs at Fort Funston, a low-lying fence near the cliff and better signage could keep people and dogs away from the cliff. Education programs to socialize dogs to horses could help reduce negative interactions between horses and dogs on trails.

? The DEIS considers dogs as if they are the only animal species with possible impacts in the GGNRA. There is no discussion of impacts of natural predators on snowy plover birds and how that compares to those from dogs, or how do human disturbances compare to disturbances from dogs. Without this context, the DEIS cannot say restricting dogs will have a significant positive impact on species.

? The DEIS did not consider negative impacts on dog behavior caused by severe restrictions on off-leash in the GGNRA and by resulting overcrowding in city parks. Expert dog trainers and behaviorists, including Dr. Ian Dunbar, Trish King, Jean Donaldson, concur that the loss of off-leash exercise will cause an increase in problem dog behaviors, including bites. This resulting increase in problem behaviors will lead to an increase in surrenders at city shelters, which cannot handle the increase. This is another impact on surrounding communities that was not considered in the DEIS. The SF Animal Control and Welfare Commission held a hearing on this and

passed a resolution calling on the Board of Supervisors to oppose the Preferred Alternative because of that.

I support Alternative A, the No Action alternative, and would also include the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra) in San Mateo county.

Respectfully,

Kimon Manolius, JD San Francisco, CA 94131

CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Correspondence ID: 3797 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 29th 2011

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely,

John

Correspondence ID: 3798 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, Like thousands of other responsible pet owners, I walk regularly at Fort Funston. I am there seven days a week, for the "early shift" just before 7am. I have one dog, and up until about a year ago had two. I am extremely disturbed by the unfairness of the proposed plan to limit dogs and off-leash dog walking.

In my seven years of daily walks at Fort Funston, I have met countless interesting, productive and caring people. Enormous efforts are expended to keep Funston clean and safe. I have heard countless stories from many long-time walkers about the decrepit and filthy state of Fort Funston before it was "taken over" by the dog people. As you no doubt know, we are a cohesive community of responsible dog owners, providing social interaction for many who would not regularly have a community (MANY SENIORS) or daily social interaction.

A very large number of seniors have dogs and walk them at Fort Funston (and no doubt other GGNRA areas). I personally see and walk with more than eight every morning between 6:45 and 8:30am. The eldest of my friends is 88 and walks daily with her shepherd. You will be removing an important social and fitness benefit from many lives if you so severely restrict off-leash dog access.

I would like to inquire about the fact that over the past eight months or so, the gate at Fort Funston is often locked shut for hours beyond dawn/sunrise. On a typical morning when this happens, you will see up to 20 or more cars parked along Skyline. It is very dangerous for people to have to pull in and out right on the side of the road, to say nothing of walking your dog from your car along Skyline to the path up to the Fort. Once again, I would like to bring up the issue of the morning seniors, who I assure you are very uneasy with this parking arrangement. I have backed many cars out for seniors who were concerned about getting their car out into the Skyline traffic. I truly believe it is inevitable that there will be an accident, and a person or dog will be hurt. If it is in fact true that the gate should open at sunrise, please honor that. We all see the many park vehicles inside the gate when it is locked. Fact or fiction, many of us believe the gate gets opened late whenever there is a march, or a meeting, or some new development in this dog crisis.

I am very concerned about the possible future lack of off-leash dog space. Where will we all go? What will happen to small neighborhood parks?

The remainder of my message is boilerplate, but I agree strongly with every word. The GGNRA is proposing to relegate us to a hilly pasture of foxtails at Fort Funston. This is unworkable and I urge you to work to compromise with us.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based"

approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Nina Steinman San Francisco, CA 94118

Correspondence ID: 3799 **Project:** 11759 **Document:** 38106

Received: May,29,2011 18:31:20

Correspondence Type: Web Form

Correspondence: My wife and I have spent many happy hours for the past two-plus years walking with our Norwich terrier, Emma, and some times with Emma and our now four-year old grandson, Levi, up and down the trails, over the dunes, and along the beaches of Ft. Funston. I have spent only a few hours, and much less happily, reading GGNRA Draft Dog Management Plan / Environmental Impact Statement.

I certainly learned a little about soils, plant and animal species, and the potential impacts on all from dogs (although I must tell you that on a per minute basis our grandson has a much greater impact on all of these).

I have no doubt that the good people who worked on the EIS are overwhelmingly earnest, sincere, intelligent, and dedicated to their view of the form in which the GGNRA should be preserved (another although here - although it is hard for me as a reader of the EIR to keep a straight face when it takes the authors of the report a paragraph to conclude that a little dog piddle has a negligible effect on the water quality on a beach washed twice a day by the waters of the Pacific Ocean or that the nutrients added to the local soils by dog poop is detrimental because it perturbs the natural balance of wild animal poop volume).

As one who has, like many others, stood on the high bluffs of Fort Funston and watched the sun set over the mighty Pacific Ocean as the wind gusted

through the dunes, I can tell all the authors of all the EIRs ever written that to pretend to meaningfully affect the natural forces in this world is, to the extent that it is sincere, simple hubris.

The premise of the EIR is that change is bad so that anything that promotes change, other than to undo previous change, should be stopped or, if not stopped, reduced. Those of us with more faith in the restorative power of nature than in the wisdom of man would like to leave room for the "Recreation" in GGNRA. That was the promise of GGNRA at its inception and the state of things that NPA should be preserving.

Those of us who thrill to the sight of a creature free to run and bark and accelerate erosion by "stopping fast" on soft sediments, free to sniff the breeze and even unmentionable body parts of its fellow creatures, we believe that this is worth preserving even though neither dogs nor their owners are ever going to be as universally wise and companionate and careful of the Earth many of us could wish.

I am a trained geologist and seismologist with decades of experience studying and characterizing the natural world and this I know: on the scale of geologic time it is not the Earth that is in danger - it is us. Whether we learn to preserve ourselves for a bit longer is to be determined. In the meanwhile, let us continue to enjoy a little freedom on the small percentage of GGNRA where off-leash dog running is currently allowed.

If you have survived, but not been persuaded by, this much philosophical context here are a few practical considerations.

Preferred solutions for the GGNRA areas generally are for reduced dog use rather than elimination of dog access. There are no guarantees, however, that these reductions, once implemented, will not be followed by further reductions in the future since they only ameliorate and do not solve the problem. Therefore, those who want "the ultimate solution" will be back for more restrictions. What we have now is good enough.

As you know the concern from the City is that NPC is simply unloading the GGNPA problem onto local jurisdictions and enforcement agencies. The part of the EIR that notes other dog use areas within a certain distance from current GGNRA areas makes no assessment of the impact on these new areas other than the completely unsubstantiated and qualitative pronouncement that it will generally be minor to moderate. If, in the view of the current non-dog users of these non-GGNRA areas, dog use becomes an increased annoyance raising political pressure to restrict or ban dog use in these areas GGNRA will not reconsider their EIR statements not any policies that have been implemented as a result.

In conclusion, live up to the promise of GGNRA as it was presented to all of us who supported its formation: the maintenance of needed recreational open space necessary to urban environment and planning. NPC did not inherit a pristine wilderness to be preserved, but a vibrant mixed use bequest whose status as mixed use recreation was to be protected.

Correspondence ID: 3800 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. Simply, it reaches conclusions that are not supported by either the science or the law.

I believe that the GGNRA can accommodate both recreation and conservation. People with dogs have a need to walk their dogs, spend time with their dogs, and enjoy their dogs. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

In this time of recession, the GGNRA is proposing to spend money policing areas to make sure no dog owners are breaking the law, instead of trying to acquire more land so there is more room for dog owners and non-dog owners alike.

The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional

restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: I have lived in Montara for over 30 years, very near one property that will soon be within the GGNRA 'fold'. I was told by a GGNRA representative that this area too will have to be policed to make sure dog walkers keep their animals on leash. Now I walk this area at least twice a week, once with my dogs and once on horseback. I can count on one hand the number of times I have seen someone else in this area, whether on foot or on horseback. And you plan to tell me that I cannot walk my dog offleash because that is the Rule? Why try to restrict people's lives? Why not try to have less rules and let the general populace work together to solve problems that may arise?

Sincerely,

Linda Steinhoff

Correspondence ID: 3801 **Project:** 11759 **Document:** 38106

Received: May,29,2011 18:32:18

Correspondence Type: Web Form

Correspondence: I am a native San Franciscan. I live in Bernal Heights in San Francisco. I am a home owner and dog owner and as such I often hike in GGNRA both with and without my dog. I feel that the designated areas for dogs should not be changed in any way detrimental to the livelihood of the dogs. While on the streets of San Francisco we walk on leash, of course. In the dog parks/areas is where the dogs get to shine, socialize, train and run off all that energy they have from living indoors most of the time. My dog would not be able to get the exercise she needs and loves if she was on leash the whole time as I am not physically able to do it. Off leash, however, she can run around with other dogs and/or run after the ball multiple times getting lots of exercise. I've heard is said many times by dog trainers, a well exercised dog is a well behaved dog. I can truly attest to that.

GGNA parks are awesome for everyone! We especially love going to Fort Funston at least once a week. I have yet to have a bad experience there. Nothing but good pets and good people. All working with each other to help get the dogs social and well behaved. If they were all on leash it might be difficult to get them better behaved. It seems to me when dogs are on leash they sometimes seem to be more territorial and protective of owners then when they are off leash. I've noticed this especially with dogs that are generalized as aggressive: pit bulls, german shepherds, dobermans, etc. It's an amazing sight to see them all getting along so well in big open spaces. I've even heard a dog owner say of their 5 little barking/agressive poodles, "oh, they just bark because they never get off leash". Perhaps if they had

some off leash socializing they wouldn't be so barky on leash.

I am a responsible dog owner and keep my dog always in sight at least 50 to 30 ft close to me and call her near if she starts to drift.

As long as the areas that need to be protected are fenced off and proper signage is up then dog owners do keep the dogs out of those areas.

Please do not punish 98% of the dogs/owners because 3% are behaving poorly.

Sincerly, Diane Carrara

Correspondence ID: 3802 **Project:** 11759 **Document:** 38106
Received: May,29,2011 18:35:56
Correspondence Type: Web Form
Correspondence: May 29, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, For Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan, Draft Environmental Impact Statement

Dear Superintendent Dean,

My name is Paul Quinn, my wife, dog and I live in the Sunset district of San Francisco. Since moving to San Francisco in 2004, we've always loved walking on the beach to relax and enjoy the natural beauty of Northern California. Two years ago, walking on the beach became even more important to us with the addition of a dog to our family. Being responsible dog owners, we took great care to ensure that our dog is well trained and behaved (adhering to all posted regulations), always under voice control and clean up after her. We take our dog to GGNRA off-leash beaches, most often Crissy Field four or five times a week. Additionally, I am an active outdoor athlete, and use the GGNRA frequently for hiking and running and never find (or have found) off-leash dogs to be a problem.

I do not agree with the GGNRA's current Preferred Alternative as it significantly restricts and eliminates off-leash dog walking in many areas of the GGNRA. The ability to take my dog for an off-leash walk at Crissy Field is just as important to me as it is to her: it allows us both to get exercise, socialize with our neighbors and enjoy our city. As a responsible pet owner, I fail to see the value or fairness in punishing the many for the

actions of a few.

Specifically, the Compliance-Based Management Strategy is not acceptable. By creating a poison pill, a few "bad apples" will have the power to ruin the off-leash experience of countless responsible dog owners. By all means, the current rules must be enforced, and I support fines for violating them. Furthermore, the GGNRA is not wilderness, it is part of an urban environment and as such there are many "non compliant" behaviors (e.g. speeding cars, bikes where they are prohibited, etc.). Should all activity in the GGNRA be subject to similar strategies, or, should enforcement be applied to all users of the GGNRA?

Given the importance of off-leash dog activities to the citizens ? human and canine ? of San Francisco and the Bay Area and since only 1% of GGNRA land is available for off-leash dog use, at the very least, the "No Change" Alternative A should be adopted.

Having said that a broader more comprehensive alternative should be considered and include the current off-leash areas without change and without any compliance-based strategy and open additional trails to off-leash dog walking.

In conclusion I'd like to reiterate by objection to the current Preferred Alternative. As a responsible dog owner with a well trained and well behaved dog who lives in San Francisco, we ? my dog and I ? depend on off-leash recreation in our urban environment. Furthermore, responsible dog owners deserve access to more off-leash space, not less. As I mentioned above, I'm an active person who runs and hikes on GGNRA trails and the Preferred Alternative does not have enough access to trails.

Respectfully,

Paul Quinn San Francisco, CA 94122

cc: Secretary Ken Salazar, Department of the Interior Christine Lehnertz, Regional Director, National Park Service, Pacific West Region Jon Jarvis, Director National Park Service Nancy Pelosi, Member, U.S. House of Representatives Diane Feinstein, U.S. Senator State Senator Leland Yee State Senator Mark Leno Mayor Ed Lee Distric 7 Supervisor, Sean Elsbernd

Correspondence ID: 3803 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area

Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to express my strong opposition to the GGNRA's shameful draft dog management plan. In addition to being based on speculation, exaggerations, and outright untruths, it reaches conclusions that are not supported by facts or by the law.

In a tolerant community like San Francisco -- where more households have dogs than have children(!) -- the current draft plan is nothing short of a disgrace.

The GGNRA has plenty of room to accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: I have been walking with my dog peacefully and respectfully at the GGNRA

for over 13 years. If I had known how poorly the GGNRA management would consider my needs as a dog-owning citizen, I would never have supported the transfer of these areas from the city to the GGNRA.

Sincerely,

Elizabeth Statmore

Correspondence ID: 3804 **Project:** 11759 **Document:** 38106

Received: May,29,2011 18:56:11

Correspondence Type: Web Form

Correspondence: I was born and raised in San Francisco. I love my city and my family. Including my dogs. I pay taxes, I am a public servant. I think the GGNRA should keep its promises to San Franciscans like me. The GGNRA promised to keep the access to dogs and their owners as they stood when they were GIVEN our CITY land. I pay my taxes. My rights should be protected. If dog off leash areas are taken away and dog friendly areas are taken away, our dogs are still going to have to be exercised causing congestion and frustrated dogs and owners in neighborhoods. Please keep your promises. Please keep Fort Funston, Muir Beach, Crissy Field, and all other access areas available to all San Franciscans, and their pets.

Correspondence ID: 3805 **Project:** 11759 **Document:** 38106

Received: May,29,2011 19:00:55

Correspondence Type: Web Form

Correspondence: Hello,

I am writing to plead that the proposed plans to cut off-leash dog walking not be approved. The dogs of San Francisco will suffer greatly without the opportunity to enjoy off-leash time within their city. I understand the need to protect endangered wildlife and plant species but I do not believe this is the way to do it. As someone who has studied the needs of dogs and worked directly with them for several years now I am intimately familiar with the exercise requirements of these pets. If people are not able to provide their dogs with off-leash exercise many dogs will not be exercised at all. As a result, they will become restless and bored and take out their frustrations on their homes and their guardians with unruly and destructive behavior. If this becomes enough of a problem, guardians may choose to relinquish their dogs to ACC, and the shelter system does not need to be any more strained than it already is.

I own a high-energy breed of dog, a shepherd, and I could not imagine

having nowhere within the city to take her for off-leash exercise. If these plans are approved you will be doing a great disservice to the dogs of San Francisco, which I have always known to be a dog-loving city.

I am unfortunately not educated enough in matters of wildlife preservation to propose an alternative plan, but I sincerely hope you will be able to find another way to protect the native species of San Francisco, and I hope also that this opens the eyes of dog owners who do not control their pets responsibly in off-leash areas.

Thank you.

Correspondence ID: 3806 **Project:** 11759 **Document:** 38106

Received: May,29,2011 19:06:45

Correspondence Type: Web Form

Correspondence: Dogs to be allowed off leash in the existing designated dog areas

limit professional dog walkers to no more than 6 dogs

certify professional dog walkers with a licensing program

setup a dog owners membership program so that membership fees can be utilized for clean up and the purchase of a bio-digester for dog wastes

utilize bio-degradable dog waste bags that can be utilized in a bio digester

communicate with dog owners via their membership to help make donations of time, and money for clean up

setup a web site for dog owners that is tied into the membership for dog owners that has FAQ on the proper usage of the dog areas in the park.

use funds from the dog owner membership to publish paper handouts for dog owners on proper usage of the park area

i think setting up a revenue model for dog owners to pay for the park maintainance as well as Bio Digesters in the Pakr so that DogOwners can drop their waste into the digesters and the digesters provide fertilizer for the plantings in the park.

Correspondence ID: 3807 **Project:** 11759 **Document:** 38106

Received: May,29,2011 19:12:25

Correspondence Web Form

Type:

Correspondence: I'm a park user, parent of 3 children and a dogowner. I support the preferred alternative, but am concerned about the ability of GGNRA to enforce these rules. I am glad the off-leash area near my home (outer Richmond) will remain open to off-leash, but I'm also concerned that the park will not be able to enforce non-leash behavior in the "ROLA" areas. That is, dogs chasing or biting children, running through picnics, etc.

Correspondence ID: 3808 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, My name is Kim Goussev, and I live in Potrero Hill. I will occasionally take my dog to the off leash grounds at Crissy Field and am always respectful of the environment- I curb my dog, control his behavior so he doesn't bother the many families that go as well, among other practices. My elderly mother and grandmother join me on occasion and they enjoy the great atmosphere at crissy field as well. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for

these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Kim Goussev San Francisco Ca 94107

Correspondence ID: 3809 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I urge the National Park Service to protect Golden Gate's imperiled wildlife from harassment by unregulated recreation.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values.

--Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs.

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Thank you for helping to create a better park experience at Golden Gate National Recreation Area, and for giving imperiled species a chance to survive.

Correspondence ID: 3810 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 29, 2011

Frank Dean, General Superintendent GGNRA Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am a 58-year-old, African-American, San Francisco homeowner and dog owner who spends a tremendous amount of time with my dog at Ocean Beach in the off-leash section. Not only do I take my rescue dog to the Ocean Beach small dog walk every Saturday morning, I also take him there every Sunday, early most weekday mornings and sometimes in the early evening, after work. This is by far, my dog's favorite area to romp off leash and my favorite location to remove myself from everyday stresses.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I want to protect the GGNRA's natural resources, I believe options other than restricting dog-walking access should be considered first. I favor an approach that truly balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such alternatives as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based on any documented impacts of non-compliance, just the mere fact that non-compliance occurs. Because it will change the status of areas from off- to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur. That violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be. It must be removed.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written (there is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers), and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration.

Sincerely,

Veronika A. Powlis San Francisco, CA 94115

Correspondence ID: 3811 **Project:** 11759 **Document:** 38106

Received: May,29,2011 19:21:21

Correspondence Type: Web Form

Correspondence:

I have one 7-year old black lab, and I walk her around sigmund stern grove, ocean beach, and fort funston several times a week.

Severe restrictions are not needed to protect other park visitors from dogs. Problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those incidents and citations issued to people with dogs, the majority were leash law violations, or being in a closed area, and did not reflect any safety issues between dogs and other park visitors. Target enforcement on the small number of people whose dogs misbehave, not on excluding the entire class of people with dogs from most of the GGNRA. Jean Donaldson, nationally recognized expert on dog behavior testified before the SF Animal Control and Welfare Commission on 2/8/07: "[S]elf-selection operates strongly, i.e., people who take the time to get into their car or walk to a designated off-leash area to exercise their dogs tend not to be the type who are derelict in other areas of dog guardianship, such as training, socialization, or appropriate containment." The DEIS does not adequately address dispersion issues. The DEIS does not adequately address the environmental and social impact of forcing large numbers of people and dogs into much smaller areas. Reducing the amount of area available for off-leash will significantly degrade the park experience for people with dogs. It will increase conflicts. Even more importantly, the DEIS does not address the environmental and social impact on small, neighborhood parks in cities like San Francisco next to the GGNRA. Because the GGNRA is located immediately adjacent to one of the most densely populated areas in the United States (San Francisco), it provides much needed recreational open space for Bay Area residents. If that open space is lost to recreational access, people and their

dogs will move to the much smaller city parks and they will not be able to absorb the hundreds or thousands of people with dogs each day that will be kicked out of the GGNRA. As further proof that the GGNRA did not consider impacts on city parks in San Francisco, the Preferred Alternative suggests the nearest legal off-leash area in San Francisco to Fort Funston is Lake Merced. That off-leash area has been closed to off-leash for years and has been turned into a native plant restoration area and habitat for the endangered red-legged frog among other animals. Yet this is where the DEIS suggests people with dogs go.

The DEIS continues a trend of GGNRA claims about impacts by dogs on birds that are not supported by the data. It is based on bad science. There is no scientific consensus that severe restrictions on off-leash dogs are needed to protect natural resources and wildlife. Some of the most compelling research in the last few years has been by researchers such as Forrest and Cassidy St. Clair (2006) and Warren (2007) who admit that they expected to find that off-leash dogs had a major impact on the diversity, abundance, and feeding behaviors of birds and small mammals. However, when they did the actual research, they found no such impacts. This indicates that assumptions about impacts from off-leash dogs must be tested and proven to be true before they can be used to justify restrictions. Unfortunately, most of the assumptions cited by the GGNRA have not been adequately tested or proven. In addition, the GGNRA has repeatedly cited research that they claim shows major impacts from off-leash dogs. However, when the raw data from these studies is analyzed, it is clear the claimed conclusions are not supported by the data. This is highly reminiscent of the problems documented at the Point Reyes National Seashore, where claims by staff biologists about negative impacts from an oyster farm located within the park were proven to be baseless when the raw data was independently analyzed.

Severe restrictions are not needed to protect the snowy plover. The GGNRA's own data show that off-leash dogs have no impact on the numbers of snowy plovers, a threatened species that roosts only (does not nest or raise chicks) on relatively small parts of Ocean Beach and Crissy Field. Indeed, larger numbers of snowy plovers frequently coincided with times when dogs were allowed off-leash in the area. The 1999 Hatch Report observed 5,692 dogs at Ocean Beach and found that only 6% chased birds (mostly seagulls). Indeed, of these 5,692 dogs, a mere 19 were observed to chase plovers. That is one-third of 1% of the dogs observed. Target those dog owners for enforcement, but leave the other 99.66% of dogs that did not chase plovers alone. Some studies define "disturbance" of a bird so broadly as to include the fact that if a bird merely looked up when it heard a sound, even if it took no further action, it was a disturbance. The GGNRA's own studies show that joggers and walkers, not to mention parents with toddlers, equestrians, surfers, and other park users "disturb" plovers, yet there is no

attempt to restrict their access in the plover areas. There are much less restrictive measures the GGNRA could take to protect snowy plovers, including the use of temporary "exclosure" fencing when the plovers are present. This would keep everyone, people as well as dogs, out of the area. Enforcement that targets people who intentionally disturb plovers would also help. During a 2/17/07 Negotiated Rulemaking meeting, Barbara Goodyear, Field Solicitor for the NPS, said that deliberate behavior (e.g., training your dog to chase birds) should be the target of a management policy, but that incidental behavior (e.g., walking by a bird and causing it to flush) should not. Yet the Preferred Alternative cites incidental behavior as a justification for increased restrictions on off-leash dogs.

Severe restrictions are not needed to protect the bank swallow. The DEIS claims "continuing" impacts from dogs and/or humans that include digging at or collapsing the burrows of bank swallows, flushing the birds from nests, and causing active sloughing and landslides that may block or crush the burrows. However, there is no documentation that any of these impacts actually occur. Bank swallows burrow near the top (but not at the top) of sheer cliff faces at Fort Funston. There is no way dogs can access these burrows, so there can be no impact on them from the dogs. A GGNRA bank swallow report claimed that these impacts "could occur" even without proof that they actually do. This "could occur" has been changed in the DEIS to "continuing impacts".

The DEIS is full of impacts of dogs on wildlife and other park visitors that "could" occur, but there is little evidence that these impacts actually do occur. After over ten years of intensive scrutiny of off-leash dogs in the GGNRA, it should be obvious if those impacts really do occur. The lack of data indicates they do not. For example, the DEIS mentions that disease "could" be transmitted to people from unpicked-up dog feces. However there has not been a single case of dog-feces-caused human illness reported by the San Francisco Department of Health for over 50 years. A management policy should not be based on hypothetical impacts. It should be based on actual, observed impacts. Hypotheticals that are not actually seen in the GGNRA cannot be used to justify restrictions on off-leash recreation in the GGNRA.

The claim that environmental justice requires severe restrictions on off-leash dogs is not supported by the studies cited in the DEIS. a) The DEIS cites a 2007 SF State study that claims all Latinos and Asians surveyed said that dogs were a problem. However, the study itself was not about the "ethnic minority visitor use experience at the GGNRA" as claimed by the DEIS, but was actually intended to address ways to improve "connecting people to the parks." Off-leash dog walking connects all different kinds of people to the parks. In addition, the SF State study was not an extensive survey ? it interviewed less than 100 non-randomly people who were largely unfamiliar

with the GGNRA (only 1/3 had visited at least one GGNRA site in the past year). b) A second study cited by the DEIS (Northern Arizona University phone study) was a scientifically rigorous study that used random sampling in identifying who was interviewed for the survey. This study concluded that there was no real difference in attitudes between the various ethnic groups about dogs in the parks. c) Indeed the restrictions on off-leash access supported by the Preferred Alternative will have a serious negative impact on the thousands of ethnic minorities who walk their dogs off-leash in the GGNRA, a point not addressed in the DEIS. Off-leash dog walking is the most diverse recreation activity in the GGNRA, enjoyed by the widest variety of people ? seniors, kids, the disabled, every ethnic group, every sexual orientation, and every social and economic class.

The claim in the DEIS that they have to manage the GGNRA in a manner similar to the way they manage parks like Glacier National Park or Yellowstone National Park is misleading and cannot be used to justify the restrictions called for in the Preferred Alternative. a) The GGNRA is a National Recreation Area, not a National Park. The mandate for the GGNRA's creation was, according to the legislation that established the GGNRA in 1972, for the "maintenance of needed recreational open space". Off-leash dog walking was acknowledged at the time as one of the traditional recreational uses taking place in the GGNRA when it was created. In 1979, the US Congress passed a law that all national park units, including national recreation areas, national seashores, and national monuments have to be managed uniformly. But, concerned that the unique purposes for each park would be overlooked in this change, they added the following language to the law: "The authorization of activities shall be construed and the protection, management, and administration of these areas ? shall not be exercised in derogation of the values and purposes for which these various areas have been established". So there is no mandate to match the GGNRA's policies with National Park Service requirements that dogs not be allowed off-leash in a national park. b) In 2002, a panel of senior National Park Service officials concluded, in part, "[T]hat offleash dog walking in GGNRA may be appropriate in selected locations where resource impacts can be adequately mitigated and public safety incidents, and public use conflicts can be appropriately managed." Adequate mitigations and management already exist ? target people whose dogs bother birds and wildlife or who jump on people, but leave the vast majority of responsible dog owners free to recreate off-leash with their dogs on the less than 1% of GGNRA land on which they've always been allowed off-leash. c) Dogs are allowed off-leash to hunt in national preserves, and other units administered by the National Park Service. Surely, if it's okay for a dog to be off-leash while it helps chase, corner and kill a wild animal, it should be okay for a dog in the GGNRA to be off-leash to play with people and other dogs. d) The GGNRA is located in the densely populated San Francisco Bay Area. It is in a major urban area. Much of the land was highly modified by the

military when they controlled the land before the GGNRA was created. The GGNRA contains numerous missile silos, artillery batteries, and their assorted support structures. The military planted huge amounts of ice plant to stabilize the sand dunes at Fort Funston and elsewhere. Standards of management that treat much of the GGNRA, especially those parts in San Francisco, like pristine wilderness are misguided. e) During 2/17/07 Negotiated Rulemaking meeting, Barbara Goodyear, the Field Solicitor for the NPS, made it clear that while all parks are managed to the same level (conservation of resources), there is flexibility in how that is done from park to park. She cited as an example, the fact that you don't manage Yosemite Valley with the expectation that people will have a solitary wilderness experience. You manage it with the knowledge that people will bump into each other in that part of Yosemite. The GGNRA, an urban park located in and immediately adjacent to a large city, does not have to be managed in the same way as Yellowstone or Glacier National Parks.

The level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use of GGNRA resources. The DEIS states that it will cost nearly \$1 million to enforce the Preferred Alternative, through the hiring of more Park Rangers or Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could easily enforce already existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking and minimal impact on natural resources and other park visitors from off-leash dogs.

The inclusion of a "poison pill" in the DEIS suggests the GGNRA will use it as an end run to ban off-leash dogs in the near future, bypassing the kind of public process such an action is normally required by law to follow. The DEIS includes a "compliance-based management strategy" that says that, if there is not enough compliance with the restrictions imposed by the Preferred Alternative, the GGNRA will change the management of the various areas to the next more restrictive level ? an offleash area will become on-leash only, an on-leash area will become no dogs at all. This change will be permanent, with no chance to go back to less restrictive levels at any time in the future. This section must be removed from any final Dog Management Plan. a) This compliance-based management strategy is decidedly unfair, because it can only be changed in one direction ? toward more restrictive levels of access for people with dogs. b) There is no provision for public comment in the case of a change in status of an off-leash or on-leash area because of the compliance-based management strategy. The GGNRA has already lost two court cases (and one appeal) when it tried to make a significant and controversial policy change without going through a public process. The federal courts have routinely told the

GGNRA that they have to hold public meetings and take public comments before making such changes. Clearly, a change in status of an off-leash area to leash-only would be both significant and very controversial, and therefore should require a period of public comment and public hearings before being implemented. The poison pill in the DEIS is an end run designed to allow the GGNRA to make such changes without having to go through a public process (they can claim the public process was the public comment on the DEIS itself, not on the changes it allows at a future time). c) How will compliance be monitored? Who will do the monitoring? The GGNRA has repeatedly relied on poorly trained volunteers with a deep-seated bias against dogs to monitor the interactions between dogs and snowy plovers. Why would we expect these compliance monitors to be any less biased? Will their claims of non-compliance be valid? Will the GGNRA resort to the use of surveillance cameras to monitor compliance? While noting that there is no mention of surveillance cameras in the DEIS, GGNRA staff have refused to say they would never be used. d) This allows a few bad actors to result in the removal off-leash access everywhere in the GGNRA, even if there are tens of thousands of hours of incident-free dog walking for every single incident. Including a "nuclear option" in a management plan is not good management policy. Regulations already exist to target those who do not control their dogs when they are off-leash. Target enforcement at those bad actors, not at the huge numbers of dog walkers who do not cause problems.

Off-leash play decreases the likelihood of dog aggression in dogs. In comments to the SF Animal Control and Welfare Commission on 2/8/07, Jean Donaldson, then head of the Dog Training Program at the SF/SPCA and a nationally recognized author on dog behavior said: "There is not only no evidence that allowing dogs off-leash for play opportunities increases the incidence of aggression, to a person, every reputable expert in the field of dog behavior in the United States is of the opinion that it is likely that off-leash access decreases the likelihood of aggression." She also said: "Interestingly, it could very well be that the safest dogs are those that attend off-leash dog parks." And she said: "There is no research demonstrating that dog parks or off-leash play contributes to any kind of aggression, including dog-dog aggression."

A well-exercised dog is a well-behaved dog. Dogs that are not adequately exercised can develop behavior problems such as barking, destroying property in the home, etc. Behavior problems are one of the primary reasons that people surrender dogs at shelters. San Francisco has a "No Kill" goal that no potentially adoptable animal in a city shelter (SF Animal Care and Control, SF/SPCA, Pets Unlimited). Representatives of the SF/SPCA have said that the Preferred Alternative will make it harder for the SF/SPCA to perform their mission to reduce surrenders to city shelters and make San Francisco a truly No Kill city.

Correspondence ID: 3812 **Project:** 11759 **Document:** 38106

Received: May,29,2011 19:23:07

Correspondence Type: Web Form

Correspondence: For full disclosure, I am an employee of the GGNRA, but am not speaking on behalf of the park--only as an individual, father of three children and owner of a dog. I support the preferred alternatives with the following exceptions:

1. I believe that leashed dogs should be allowed on the paved road at Sweeney Ridge. That is, the road between Sneath Lane and the Nike Missile Site. This would serve the park's goal of keeping the wilder sections of the site dog-free, but allow local residents the opportunity to walk on a portion of the park.

2. I believe that the proposed alternative at Fort Funston will not work unless the park fences the trails to keep visitors and dogs on trail. My experience working at Fort Funston has shown that unless fences are present, dogs will roam wherever their owners allow. That said, I suggest making the trails very wide, say 15 or 20 feet, to allow plenty of room for visitors with and without dogs to enjoy the trails. This will prevent a "fenced in" feeling, while allowing the park to restore the dune habitat that used to dominate Fort Funston. I don't believe the park can enforce leash laws or area restrictions without fences, and believe that fencing has worked in the northern portion of the site, allowing habitat restoration while also allowing dog owners and non-dog owners to enjoy the site.

Finally, I believe that many dog owners see citation fines as "the cost of doing business," and encourage the park to increase citation costs, especially for repeat offenders.

Thank you for your time and effort on this difficult issue.

Correspondence ID: 3813 **Project:** 11759 **Document:** 38106

Received: May,29,2011 19:37:32

Correspondence Type: Web Form

Correspondence: With all due respect, it does not make any sense to implement a policy requiring dogs to be on leash at all times in national park property. Dogs who play off leash at the beach or in national parks do not threaten or endanger any plant or animal life, they are simply enjoying playtime with their masters and other playmate dogs and do not bother anyone. 99.9% of dogs are well behaved, have owners who pick up after them and ensure that

they do not make any damage or bother the few humans who do not like or for some reason are afraid of dogs.

The dog owners who do not clean up after their dogs or let them behave inappropriately are the ones that should be dealt with and fined. At least there are only few of them. Restricting all dogs because of a few is not appropriate. My dog loves to run after his Frisbee and swim out in the Bay after it. How long do you suggest his leash now should be if your policy is implemented? Revise your plan and leave things as they are.

Correspondence ID: 3814 **Project:** 11759 **Document:** 38106

Received: May,29,2011 19:41:08

Correspondence Type: Web Form

Correspondence: A flat-out policy needs to be made that any new lands added to the GGNRA (eg., Sharp Park and environs) is dog-free.

No dogs, on or off-leash. This is especially important at Sharp Park where there are two Endangered species that need protected.

Correspondence ID: 3815 **Project:** 11759 **Document:** 38106

Received: May,29,2011 19:49:29

Correspondence Type: Web Form

Correspondence: Thank you for accepting comments on the GGNRA Proposed Dog Management Plan. My partner and I just spent the last two days pouring over the GGNRA's Criminal Incident Records for the year 2009 (Redacted) that relate to domestic animal issues at the GGNRA. We have categorized the incidents that were available to us and have copied them into this comment for the record.

Unfortunately, these reports which were provided at the request of a colleague under the Freedom of Information Act were only provided very recently and not in time to submit earlier comment. Also reports for the year 2010 have not yet been provided as requested so it is not possible to determine whether there have been any improvements or progress in number or degree of incidents of this type. We believe the information included in the 2009 and 2010 Criminal Incident Records should have been included in the Draft Environmental Impact Statement.

In reviewing the 2009 Criminal Incident Records several items stand out. 1. Based on these 2009 reports the professionalism of the U.S. Park Officers and Rangers was outstanding during this difficult period of transition and should be commended for their performance. As local naturalists and

wildlife advocates these officers have our gratitude for performing a very tough job with patience and dignity. Thank you! 2. There are a high percentage of non-compliant dog owners and professional dog walkers who provide false information or are rude and verbally abusive to the U.S. Park Officers. We are saddened to read about these incidents but not surprised based on our own experiences with non-compliant dog owners in the GGNRA. 3. There are a surprising number of fraudulent representations of dogs as "Service Dogs" 4. There are a high number of non-compliant dog owners who are repeat offenders. 5. Professional Dog Walkers place a tremendous burden on the natural resources of the parks and GGNRA Staff. 6. There is a high degree of variability between Park officers and at different park properties as to whether a non-compliant dog owner will be cited or given a warning. 7. Many dog owners whose dogs have acted aggressively towards other dogs or visitors flee the scene when an injury occurs or a complaint is registered. 8. Many non-compliant dog owners are abusive to visitors who complain to them about their dog's behavior or their handling of their dog. 9. Overall there is a tremendous burden to the U.S. Park staff in dealing with non-compliant pet owners.

Some conclusions: 1. Based on many hundreds of hours over decades of personal observations while at the GGNRA and the number of records in this 2009 report, the officers are observing only a very small subset of the number of actual domestic animal code violations that occur within the GGNRA. Of course the most egregious violations, if observed by visitors or park staff, are reported and handled quickly by officers. It is apparent that the vast majority of violations of rules are never reported by visitors or observed by park staff. Naturally, many non-compliant owners change their illegal behaviors quickly upon noticing the presence of park staff. Due to the size of the parks compared to the park's small number of staff a visitor can hike for many hours, even days, without ever coming in contact with park staff. Therefore the incidents in this report should be considered as a small percentage of the overall violations that do occur within a year at the parks. 2. The non-compliant dog owners listed in the majority (>90%) of incidents in the 2009 Criminal Incident record are given a verbal or written warning. The reports indicate that their names are entered into a database and they will be cited for subsequent infractions. During this transition and education period I personally concur with this method. However, using traffic law violations as a metaphor for pet rules in the parks is not unseemly and if licensed auto drivers come to expect only a warning when they are caught running a stop sign they are much less likely to comply with that law in the future. 3. Repeat dog rule offenders should always be cited and chronic offender's fines should increase with the number and severity of the offense. 4. Professional Dog Walking should not be allowed but being that the burden of proof is so high for the officers, all dog walkers should be limited to three dogs per walker.

GGNRA 2009 Criminal Incident Records involving dogs

Off-leash dogs at the GGNRA have harmed park visitors. 13 Records, at least 13 people injured 140009008641 Muir Beach, dog and juvenile on boogey board collide in water, boy taken to hospital for medical care 070009-012319 Ft. Funston 3 dogs charge visitor, one bites visitor 060009-000882 Ft. Funston 1 Dog bites NPS Employee, owner flees 270009-003014 Presidio Pacific Arguello 1 dog off leash bites visitor Being walked by Professional Dog Walker 200009-003278 Crissy Field One child bitten, another harassed by off leash dog 270009-004443 Presidio Pacific Arguello ? Bicycling tourist attacked, bitten by "group" of dogs being walked by Professional Dog Walker ? hospitalization required 070009-006549 Ocean Beach Off leash dog attacks, seriously injures off-leash dog and then bites dog owner 260009-009703 Presidio Riley Ave. 8 dogs off leash, one bites visitor Being walked by Professional Dog Walker 070009-009837 Ft. Funston 1 dog off leash bites Hang Glider when landing, owner flees 070009-011151 Ft. Funston Off leash dog attacks, seriously injures off-leash dog and then bites two dog owners 200009-011718 Crissy Field Visitor bitten by off leash dog, dog owner flees but tracked by vehicle license and cited 070009-011102 Ft. Funston Two off leash dogs attack, injure third off-leash dog, a visitor (not a dog owner) was bitten breaking up the three dogs, requiring care. One owner was slightly injured. All three dogs over 125 pounds in weight. 150009005047 Stinson Beach ? dog bites adult jogger 070009009173 Ft Funston person with leashed dog that had been attacked by group of unleashed dogs asked person responsible for off leash group to leash her 10 dogs. Person with unleashed dog group accused of throwing coffee on car.

Non-compliant, aggressive and/or abusive dog owners interfere and endanger Federal Officers and Rangers: 260009-001736 Portola St, Pres. 4 aggressive off leash dogs nearly bite ranger 200009-011332 W. Bluff Picnic area ? off leash dog harassing Police Horses Disorderly Conduct 200009-009110 Mountain Lake Professional Dog Walker, 7 off leash dogs, 2 harassing Police Horses, walker rude and disorderly to officer 260009-010113 Ecology Trail 6 off leash dogs, harassing Police Horses, Professional Dog Walker rude, non-compliant and disorderly to officer ? only verbal warning due to hazard to horses and officers 260009-010431 Ecology Trail 24 dogs off leash in on-leash zone, 3 Professional Dog Walkers given verbal warnings due to hazards to horse and officer 030009-011260 Ft. Mason Non-compliant, disorderly, abusive conduct towards a Police Officer from off leash dog owner in an on leash area while officer is performing duties. Dog Owner resisted arrest and claimed to have an illegal agreement with another U.S. Park officer. 260009-011736 Pops Field Professional Dog Walker, 6 off leash dogs, 1 charging, harassing Police Horse, professional dog walker non-compliant to officers commands 070009-012408 Ft. Mason Off leash dog in on-leash area attacks Police

Horse on Ft. Mason Horse Trail requiring use of force (pepper spray) by officer 070009000382 Ocean Beach off leash providing false information 070009000615 Ocean Beach 1 dog off leash, resisted officer requests 070009000615 Ocean Beach 1 dog off leash, resisted officer requests 060009000909 Sutro repeat, 2 dogs off leash, resisted officer 07000901976 Ocean Beach 2 dogs leashed but not held, needed police backup 030009002386 Ft Mason 40 unleashed dogs, harassment of officer by another individual 030009002482 Ft Mason 2 unleashed dogs, false ID, others taunted officers 090009009835 Ft Baker dog off leash, verbal abuse of officer 090009010129 Ft Baker dog off leash, resisted officer 170009010168 Mori Pt 2 dogs off leash, false identification, insulting officer 100009-012117 Black Sands Beach Dog in No Dog area, disorderly owner 170009003226 Mori Pt using social trail, dog off leash, insulted officer, backup requested 070009003594 Ocean Beach 2 dogs off leash, false identification, repeat offender 200009-010170 CF WPA 2 dogs off leash in WPA, one disorderly owner 170009010168 Mori Pt 2 dogs off leash, false ID 200009-011750 CF WPA dog off leash, disorderly owner 260009-000289 Ecology Trail 3 dogs off leash Disorderly Professional Dog Walker 200009-000624 CF WPA 1 dog off leash, disorderly owner 200009-000629 CF WPA 1 dog off leash, disorderly owner 200009-001094 CF WPA 5 dogs off leash in WPA 4 Verbal warnings, 1 citation, disorderly owner 070009-001248 Ocean Beach 1 dog off leash in WPA, owner disorderly 260009-001283 Portola Dirt 3 dogs off leash, owner disorderly 070009-001883 Ocean Beach 2 dogs off leash in WPA, 2 disorderly owners 030009-002486 Ft. Mason 40 dogs off leash, abusive & non-abusive owners 230009-007759 Kobbe/Washington 1 dog off leash in on-leash zone disorderly owner 170009-007110 Milagra Ridge 2 dogs off leash ? disorderly owner 230009-010532 Ft. Mason 3 dogs off leash in on-leash zone, owners disorderly 130009-011660 Tenn. Valley 1 Dog in No Dog area, disorderly report

Off-leash dogs have been involved in many dog fights and dog bites at the GGNRA. 260009-000538 Lombard Ruger Pres. Off leash dog attacks, injures on-leash dog 070009-001603 Ft. Funston Off leash dog attacks, injures on-leash dog 070009-002888 Ft. Funston Off leash dog attacks, injures off-leash dog 030009-005768 Ft. Mason Off leash dog attacks, injures off-leash dog, false information given by dog owner 070009-006064 Ocean Beach Off leash dog attacks, injures off-leash dog, owner flees scene 200009-006422 Crissy field Off leash dog bites, injures off-leash dog 030009-007267 Ft. Mason Off leash dog attacks, injures off-leash dog, false information given by dog owner, flees scene 080009-008403 Mori Pt. 6 dogs off leash, one attacks, causes stroke to on-leash dog 20009001231 WPA off leash dog bites officer 07000902736 2 dogs off leash, one bit officer and growled 070009007313 Ft Funston woman bit by German Shepard, woman required medical care 2000097656 WPA two dogs bit a miniature leashed horse, stopped when bystanders kicked the dogs and

pulled their collars, horse required UC Davis vet hospital care
070009008771 Ocean Beach pit bull attacks bulldog, bulldog injured in head and eye requiring vet care. Racist, foul language from group associated with bulldog, group fled before officer arrived. Person separating the dogs, punched dog, and was bit. 14009188 Muir Beach pit bull and boxer fight, boxer required \$315 vet care from bite 0700090140048 Ft Funston group of off leash dogs, one dog bit human 0700090003500 Ocean Beach off leash golden retriever bit by 1 of 3 off leash pit bulls. Dog required 36 stitches \$950 in vet costs 130009004632 Marin Oakwood Valley Trail May 8, 2009? coyote bit off leash dog which was off trail, dog required vet care. 1140009013962 Rodeo Beach ? unleashed dog "snapped, growled, humped" another unleashed dog then dog was bitten. Owners argued, foul language ensued. 60009001627 Sutro 2 dogs chased another dog, false information to officer 70009001710 Ft Funston 2 off leash dogs; 1 dog owner kicked dog

Off-leash dogs have been injured at the GGNRA falling off steep cliffs:
070009002454 Ft Funston, off leash dog ran away, stuck in cliff, Fire Dept, Ambulance 070009008417 Ft Funston dog stuck on cliff, technical rescue required 070009009156 Ft Funston dog stuck on cliffs, Fire Dept. dispatched for rescue. Two beach patrol officers, 3 rangers, 1 park police, 10 firefighters required 2 hours for this "preventable rescue". 0700010001 Ft Funston man and dog stuck on cliff, SF Fire Dept rope rescue required 070009004582 Ft Funston dog and person stuck on cliff, 3 park rangers, 2 life guards, rope rescue required 070009013710 Ft Funston dog and person stuck on cliff 12/16/2009, several park officers required for rescue 070009-001832 Ft. Funston Dog fell over cliff ? Heavy Rescue required 070009-010997 Ft. Funston Dog fell over cliff ? Heavy Rescue required

Charging and growling off-leash dogs frighten visitors and hamper their ability to enjoy the GGNRA: 200009-006182 Halleck/Mason 1 dog off leash repeatedly runs into path of bicyclists in "Escape from Alcatraz" triathlon Race, interrupting endangering riders 070009-007421 Ocean Beach 1 off leash dog knocks down, bruises two children 070009-008052 Ft. Mason 2 Dogs harass 2 horses whose owners harass dogs 200009-008867 CF Beach 2 dogs off leash aggressive towards complainant visitor 020009-010027 Aqua. Park 1 off leash dog harasses visitor who complains to dog owner ? dog owner then abuses visitor 260009-012622 Ecology Trail Visitor Complaint - 8 dogs off leash in on-leash zone, 2 dogs attack visitor, Professional Dog Walkers flees 070009013141 Ft Funston ? dog jumped out of car, nearly hit by officer's vehicle, owner did not stop immediately, visitors helped place dog in officer's vehicle

Dogs in areas where no dogs are allowed: 89 Records involving at least 130 dogs: 090009-010410 Ft. Baker 1 Dog in No Dog area, disorderly, abusive owner 060009-001055 China beach 1 Dog in No Dog area 130009-010846 Tenn. Valley 1 Dog in No Dog area 100009-010836 Black Sands Beach 3

Dogs in No Dog area 130009-010876 Tenn. Valley 1 Dog in No Dog area 140009-011621 Pirate's Cove 1 Dog in No Dog area 130009-011661 Tenn. Valley 1 Dog in No Dog area Cite# 2334208 Coastal Trail/Fire rd. Dog in No Dog area 130009-000410 Tenn. Valley 1 Dog in No Dog area 060009-001743 China beach 1 Dog in No Dog area 130009-002061 Tenn. Valley 2 Dogs in No Dog area 130009-002448 Tenn. Valley 1 Dog in No Dog area 170009-002964 Sweeney Rg. 3 dogs off leash 050009-003884 Ft. Point Pier 1 Dog in No Dog area 100009-004272 Black Sands Beach 2 Dogs in No Dog area 200009-005249 CF WPA 1 dog off leash in closed portion of WPA 100009-005297 Black Sands Beach 1 Dog in No Dog area 180009-006355 Tenn. Valley 1 Dog in No Dog area 130009-006708 Tenn. Valley 1 Dog in No Dog area 150009-006959 Stinson Beach 1 Dog in No Dog area 100009-007372 MH Kirby Cove 1 Dog in No Dog area 150009-007467 Stinson Beach 2 Dogs in No Dog area, repeated after warnings 130009-007482 Tenn. Valley 2 Dogs in No Dog area 130009-007575 Tenn. Valley 1 Dog in No Dog area 130009-007936 Tenn. Valley 1 Dog in No Dog area 130009-007938 Tenn. Valley 1 Dog in No Dog area 150009-008231 Stinson Beach 2 Dogs in No Dog area 200009-008756 CF Lagoon 1 dog off leash in closed section, left feces 130009-009861 Tenn. Valley 1 Dog in No Dog area 230009-010774 Batt. to Bluff Tr. 1 Dog in No Dog area 110009-012950 MH Bobcat Tr. 2 Dogs in No Dog area 130009-012955 Tenn. Valley 1 Dog in No Dog area 130009-013146 Tenn. Valley 1 Dog in No Dog area 130009000049 area closed to pets 130009000360 area closed to pets 150009000452 area closed to pets 4 dogs 150009000455 area closed to pets 2 dogs 230009432 dogs in plants in area closed to pets 150009000457 area closed to pets 2 dogs 130009000488 area closed to pets 2 dogs 13009001879 Tennessee Valley 3 dogs in no pets area, 1 off leash 230009002396 Ft Scott dog in no pet area 130009002543 Tennessee Beach dog in no pets area 13000902459 Tennessee Beach dogs off leash in no pets area, bottles on beach 06009007120 China Beach dog in no pets area 130009007470 Tennessee Valley dog in no pets area, false info 130009007469 Tennessee Valley dog in no pets area 10009007951 Marin Headlands dog in no pets area 80009008116 Phleger Estate 3 unleashed dogs 1109008503 Marin Headlands Marincello dog in no pets area 80009008501 Marin Headlands dog in no pets area 111009008579 Marin Headlands Bobcat Trail, 2 dogs off leash 130009008584 Tennessee Valley dog off leash 070009008724 Ft Point Pier dog, no dog area 110009008952 Marin Headlands, 3 dogs in no pet areas 140009008983 Coyote Ridge 2 dogs in no dog area 130009009591 Tennessee Valley 2 dogs in no dog area 130009009588 Tennessee Valley dog in no dog area 130009009822 Marin Headlands dog in no pets area 130009003069 Tennessee Valley dog in no pets area 130009003071 Tennessee Valley 3 dogs in no pet area 130009003673 Tennessee Valley dog in no pets area 110009003652 Marin Headlands dog off leash in area closed to pets 130009004234 Tennessee Valley dog in no pets area 100009004277 Black Sands 2 dogs in no dog area 110009004739 Bobcat Trail dog off leash in no dog area

230009005038 Presidio Bluffs trail 35 contacts with off leash dogs, 10 dogs in no pets area 130009005318 Tennessee Valley 2 dogs in no dog area 130009006265 Tennessee Valley dog in no pets area 150009006959 Stinson Beach ? owner refused lifeguard instructions to remove dog from beach 110009012716 Marincello Trail 2 dogs in no pets area 130009012952 Tennessee Valley dog in no pets area 140009013158 Tennessee Valley dog in no pets area 130009013250 Tennessee Valley dog in no pets area 130009013251 Tennessee Valley dog in no pets area 060009013252 Tennessee Valley dog in no pets area 100009013244 Kirby Cove dog in no pets area 140009013285 Coyote Ridge, dog in no pets area 130009013406 Tennessee Valley 2 dogs in no pets area 130009013402 Tennessee Valley 2 dogs off leash 09013773 Tennessee Valley dog off leash in no pets area 150009013935 Stinson dog off leash, out of sight of owners in no pets area 150009014036 Stinson beach, dog in no pets area 14000911878 Coastal Fire Rd ? dog in no pets area 090009000166 off leash 1400000358 dog with no owner on beach, begging for food 09009000454 dog off leash 20009000581 dog off leash being washed in shower facility

Running dogs off-leash at the GGNRA puts the welfare of wildlife at great risk. 007009000043 WPA dog off leash 007009000113 WPA dog off leash 200009000193 WPA dog off leash 070009000266 WPA dog off leash 070009000268 Ocean Beach off leash 070009000307 Ocean Beach off leash 120009000385 two off leashed dogs in leash area, flushed birds 08000900403 Dog off leash in endangered species area 070009000383 Ocean Beach off leash 070009000443 Ocean Beach off leash 070009000451 Ocean Beach off leash, left dog unattended 070009000444 Ocean Beach off leash 070009000448 Ocean Beach off leash 050009000484 off leash in leash area Ft Point 200009000482 WPA dog off leash 200009000576 WPA dog off leash 070009000616 Ocean Beach off leash 070009000570 Ocean Beach off leash 070009000612 Ocean Beach 2 dogs off leash 070009000661 Ocean Beach advised 5 people with off leash dogs 150009000677 Sweeney Ridge dog off leash 170009000676 Sweeney Ridge two dogs off leash 070009000825 Ocean Beach dog off leash 070009000822 Ocean Beach dog off leash 080009000928 Mori Pt 2 dogs off leash 070009000981 Ocean Beach 2 dogs disturbing plovers and other shorebirds 200006000890 WPA dog off leash 800090001045 Mori Pt off leash 800090001042 Mori Pt off leash 070009001060 Ocean Beach 3 dogs off leash 200009001106 Crissy dog off leash 070009001101 Ocean Beach 2 dogs off leash 070009001109 Ocean Beach dog off leash 070009001112 Ocean Beach dog off leash 000909001102 Ft Baker dog off leash 170009001143 Milagra Ridge dog off leash 170009001163 Sweeney Ridge dog off leash 170009001148 Ocean Beach dog off leash 170009001142 Milagra Ridge dog off leash 070009001149 Ocean Beach dog off leash 200009001200 WPA 2 dogs off leash 070009001209 Ocean Beach dog off leash 07009001207 Ocean Beach dog off leash 20009001241 Ocean Beach 3 dogs off leash 20009001231 WPA 5 dogs off leash, 1 scattered birds

20009001239 Ocean Beach dog off leash 07009001249 Ocean Beach dog off leash 07009001243 Ocean Beach dog off leash 07009001251 Ocean Beach dog off leash 07009001289 Marin Headlands dog off leash, off trail 20009001290 WPA 2 off leash dogs 00809001316 Mori Pt. Off leash repeater, near cliffs 08009001322 Mori Pt 2 off leash dogs 07009001362 Ocean Beach off leash dog 17009001440 Sweeney Ridge off leash 20009001451 WPA 6 off leash dogs 20009001526 Mori Pt dog off leash 07009001583 Mori Pt 4 off leash dogs 30009001604 Ft Mason off leash repeater 08009001733 Milagra Ridge off trail, unleashed dog 09009001795 Battery Yates off leash dog in Mission Blue habitat 09009001785 Ocean Beach dog off leash, no voice control 09009001768 Ocean Beach dog off leash 09009001769 Ocean Beach dog off leash 17000901958 Mori Pt off leash 07000901974 Ocean Beach dog off leash 07000901979 Ocean Beach off leash 17000902003 Sweeney Ridge off leash 08000902205 Mori Pt off leash dog 07000902228 Sutro off leash 07000902232 Ocean Beach 2 off leash dogs 070009002453 Ocean Beach off leash 170009002626 Sweeney Ridge off leash 170009002616 Sweeney Ridge 2 dogs off leash 170009002625 Sweeney Ridge human urination, dog off leash 170009002684 Sweeney Ridge dog off leash 200009002622 WPA dog off leash 008009002701 Mori Pt off leash dog in newly planted area 080009002699 Mori Pt off leash dog 70009002689 Ocean Beach off leash through 5 Snowy Plovers 13000902825 Tennessee Valley off leash off trail 07009002835 Ocean Beach dog off leash 20009002918 WPA off leash, no voice control 08000902919 Mori Pt 2 off leash dogs 080009002920 Mori Pt off leash dog 170009007107 Sweeney Ridge off leash & Mori Ridge off leash 170009007345 Sweeney Ridge off leash dog 170009007340 Milagra Ridge off leash dog 170009007348 Sweeney Ridge 2 off leash dogs 20009007365 WPA 2 people 2 off leash dogs 20009007374 WPA dog off leash 090009007676 Ft Baker dog off leash 2000900007754 WPA 6 dogs off leash 70009007856 Ocean Beach off leash 090009008162 Ft Baker dog off leash 10009008166 Marin Headlands 3 off leash dogs 1 off trail, no voice control 20009008205 WPA 2 unleashed dogs 20009008251 WPA dog off leash 80009008499 Mori Pt dog off leash 080009008567 Mori Pt dog off leash 070009008555 Ocean Beach dog off leash, no voice control, repeat offender 090009008880 Marin Headlands dog off leash in leash area 090009008888 Ft Baker 2 dogs off leash 80009008940 Milagra Ridge 2 dogs off leash 150009009116 Mori Pt dog off leash 20009009245 WPA dog off leash 170009009926 Mori Pt 2 dogs off leash 200009009329 WPA dog off leash 080009009429 Mori Pt dog off leash 070009009508 Ocean Beach dog off leash 070009009568 Ocean Beach dog off leash 070009009566 Ocean Beach WPA dog off leash 090009009753 Ft Baker traffic violation and 2 off leash dogs (repeat off leash offender) 200090009784 WPA dog off leash 200009009788 WPA dog off leash 080009009820 Sweeney Ridge dog off leash 070009009811 Ocean Beach dog off leash 200009009850 WPA 3 dogs off leash 200009009856 WPA dog off leash 090009009951 Ft Baker off leash dog, growled at officer 070009010067 Ocean Beach dog off

leash 100009010128 Main Black sands beach, nude sunbather with off leash dog 090009010182 Ft Baker dog off leash 200009002941 WPA dog off leash 100009002942 WPA dog off leash 170009002962 Mori Pt dog off leash 170009002964 Sweeney Ridge 3 dogs off leash 060009003043 Sutro Park dog off leash digging plants 070009003116 Ft Funston dog damaging park by digging 170009003174 Sweeney Ridge off leash dog 170009003170 Mori Pt 2 dogs off leash 170009003171 Sweeney Ridge dog off leash 170009003227 Mori Pt dog off leash 170009003252 Milagra Ridge 3 dogs off leash 200009003287 WPA 2 dogs off leash 070009003283 Sutro Park dog off leash 070009003589 Ocean Beach dog off leash 80009003611 Mori Pt dog off leash 80009003614 Mori Pt 2 dogs off leash 070009003848 Ocean Beach 2 dogs off leash 070009003878 WPA 11 people contacted re: dogs off leash in 2 hours, 4 additional people could not be contacted 20009003877 WPA 2 dogs off leash 090009004059 Ft Baker dog off leash 200009004057 WPA 2 dogs off leash 070009004262 Sutro Heights dog off leash 170009004378 Sweeney Ridge professional dog walker with 4 dogs off leash 090009004561 Ft Baker off leash dog 090009004621 Ft Baker off leash dog 170009004687 Mori Pt dog off leash 230009004954 WPA dog off leash 060009006043 Sutro Heights dog off leash 170009005239 Sweeney Ridge dog off leash 090009005250 Ft Baker dog off leash 090009005254 Ft Baker dog off leash 170009005711 Mori Pt dog off leash 170009006025 Sweeney Ridge off leash dog 170009006342 Mori Pt dog off leash 170009006369 Sweeney Ridge off leash dog 170009006344 Mori Pt dog off leash 170009006350 Mori Pt Sweeney Ridge 2 dogs off leash 170009007107 Sweeney Ridge 2 dogs off leash 800090012503 Mori Pt dog off leash 800090012576 Milagra Ridge 2 dogs off leash 070090012683 Ocean Beach dog off leash 070090012686 Ocean Beach 2 dogs off leash 080009012697 Mori Pt dog off leash, false ID 070009012903 Ocean Beach dog off leash interested in gulls 110009013103 Marin Headlands Rifle Range ? off leash dog harassing deer 080009013195 Sweeney Ridge dog off leash 070009013176 Ocean Beach dog off leash 140009013198 Marin Coastal Trail dog off leash ? repeat offender 060009013222 Sutro Park dog off leash 060009013223 Sutro Park dog off leash 140009013233 Muir Beach dog off leash 080009013274 Mori Pt dog off leash 140009013398 Muir Beach 2 dogs off leash Coastal Fire area 080009013435 Mori Pt 2 dogs off leash 070009013421 Ocean Beach dog off leash 140009013779 Marin Coastal Trail dog off leash 080009014097 Sweeney Ridge dog off leash 080009011 Mori Pt dog off leash ? repeat offender, agitated owner 14000913943 Marin Coastal Trail dog off leash 070009010152 Ocean Beach dog off leash, repeat offender 070009-010152 Ocean Beach 1 dog off leash in WPA 150009-010319 Sweeney Rg. 1 dog off leash in on-leash area 200009-010375 CF WPA 1 dog off leash in WPA 200009-010378 CF WPA 1 dog off leash in WPA 200009-010379 CF WPA 1 dog off leash in WPA 080009-010421 Milagra Ridge 2 dogs off leash in on-leash area 080009-010488 Mori Pt 1 dog off leash in on-leash area 080009-010490 Mori Pt 2 dogs off leash in on-leash area 090009-010658

Ft. Baker 1 dog off leash in on-leash area 140009-010821 Muir Beach Tr. 1 dog off leash in on-leash area 080009-010952 Mori Pt 1 dog off leash 080009-010953 Mori Pt 1 dog off leash 080009-011038 Milagra Ridge 1 dog off leash in on-leash area 080009011026 Mori Pt 1 dog off leash 200009011211 WPA dog off leash 080009-11253 Mori Pt 2 dogs, separate owners, off leash 080009-11659 Mori Pt 1 dog off leash 070009-011275 Ocean Beach 1 dog off leash in WPA 080009-11711 Milagra Ridge 2 dogs off leash 200009-011752 CF WPA 1 dog off leash Cite# 2334207 Coastal Trail/Fire rd. 1 dog off leash 070009-012123 Ocean Beach 1 dog off leash 070009-012340 Ocean Beach 1 dog off leash in WPA 200009-012414 CF WPA 1 dog off leash 070009-0900112 Ocean Beach 1 dog off leash in WPA 260009-000323 Ecology Trail 3 dogs off leash Professional Dog Walker 070009-000445 Ocean Beach 1 dog off leash in WPA 070009-000446 Ocean Beach 1 dog off leash in WPA 070009-000447 Ocean Beach 1 dog off leash in WPA 070009-000452 Ocean Beach 1 dog off leash in WPA 070009-000491 Sutro Heights 1 dog off leash 260009-000551 Ecology Trail 3 dogs off leash Professional Dog Walker 070009-000573 Ocean Beach 39 dogs off leash in WPA 38 Verbal warnings, 1 citation 070009-000577 Ocean Beach 1 dog off leash, pet impounded 070009-000617 Ocean Beach 55 dogs off leash in WPA 53 Verbal warnings, 1 citation, MVN for fraudulent rep. As Service Dog 070009-000619 Ocean Beach 10 dogs off leash in WPA 10 Verbal warnings, 1 prior 030009-000620 Ft. Mason 1 dog off leash 200009-000625 CF WPA 4 dogs off leash, 4 owners, verbal warning 030009-000626 Ft. Mason 1 dog off leash 230009-000663 CF WPA 1 dog off leash 200009-000674 CF WPA 7 dogs off leash in WPA 7 Verbal warnings 070009-000697 Ocean Beach 25 dogs off leash in WPA 20 Verbal warnings, 5 citations 200009-000700 CF WPA 3 dogs off leash in WPA 3 Verbal warnings 070009-000776 Ocean Beach 1 dog off leash in WPA 070009-000798 Ocean Beach 1 dog off leash in WPA 060009-000700 CF WPA 1 dog off leash in WPA 070009-000831 Ocean Beach 17 dogs off leash in WPA 17 written warnings 070009-000853 Ocean Beach 2 dogs off leash in WPA 070009-000877 Ocean Beach 3 dogs off leash in WPA 3 written warnings 090009-000892 Ft. Baker 1 dog off leash 060009-000912 CF WPA 3 dogs off leash in WPA 3 Verbal warnings 070009-000917 Ocean Beach 1 dog off leash in WPA 200009-000919 CF WPA 3 dogs off leash in WPA 1 written warning 070009-000920 Ocean Beach 1 dog off leash in WPA 070009-000925 Ocean Beach 1 dog off leash in WPA 070009-000929 Ocean Beach 1 dog off leash in WPA 070009-000930 Ocean Beach 1 dog off leash in WPA 070009-000955 Ocean Beach 1 dog off leash in WPA 070009-000957 Ocean Beach 1 dog off leash in WPA 070009-000960 Ocean Beach 1 dog off leash in WPA 070009-000961 Ocean Beach 1 dog off leash in WPA 200009-000979 CF WPA 1 dog off leash in WPA 070009-000982 Ocean Beach 31 dogs off leash in WPA 28 written warnings, 3 citations 200009-000983 CF WPA 1 dog off leash in WPA 200009-000998 CF WPA 9 dogs off leash in WPA 9 Verbal warnings 070009-001026 Ocean Beach 29 dogs off leash in WPA 27 written

warnings, 2 citations 070009-001038 Ocean Beach 1 dog off leash in WPA, owner cited Dog chased Snowy Plovers for 21 minutes 260009-001059 Ecology Trail, Pres. 3 dogs off leash 070009-001066 Ocean Beach 42 dogs off leash in WPA 40 written warnings, 2 citations 200009-001152 CF WPA 11 dogs off leash in WPA 11 written warnings, two grateful citizens 814009-001167 Ecology Trail "Numerous" dogs off leash 200009-001174 CF WPA 1 dog off leash in WPA 230009-001211 CF WPA 1 dog off leash in WPA 200009-001229 CF WPA 2 dogs off leash in WPA 070009-001238 Ocean Beach 1 dog off leash in WPA 070009-001242 Ocean Beach 1 dog off leash in WPA 070009-001245 Ocean Beach 1 dog off leash in WPA 070009-001250 Ocean Beach 1 dog off leash in WPA 070009-001314 Ocean Beach 1 dog off leash in WPA 200009-001398 CF WPA 1 dog off leash in WPA 200009-001557 CF WPA 1 dog off leash in WPA 070009-001558 Ocean Beach 1 dog off leash in WPA 070009-001585 Ocean Beach 2 dogs off leash in WPA 200009-001594 CF WPA 1 dog off leash in WPA 260009-001597 CF WPA 2 dogs off leash in WPA 200009-001598 CF WPA 1 dog off leash in WPA 070009-001770 Ocean Beach 2 dogs off leash in WPA 070009-001780 Ocean Beach 1 dog off leash in WPA 200009-001833 CF WPA 3 dogs off leash in WPA 260009-001868 Ecology Trail 1 dog off leash 060009-001872 Ecology Trail 1 dog off leash 900009-001875 CF WPA dog off leash in WPA 070009-001884 Ocean Beach 2 dogs off leash in WPA 070009-002032 Ocean Beach 3 dogs off leash in WPA 200009-002467 CF WPA 1 dog off leash in WPA 260009-002513 Ecology Trail 1 dog off leash 200009-002588 CF WPA 1 dog off leash in WPA 200009-002590 CF WPA 1 dog off leash in WPA 260009-002700 McArthur Lp 5 dog off leash 200009-003067 CF WPA 1 dog off leash in WPA 110009-003347 Marin Headlands 1 dog off leash in on leash area 900009-003067 CF WPA 1 dog off leash in WPA 070009-003572 Ocean Beach 2 dogs off leash in WPA 070009-003571 Ocean Beach 1 dog off leash in WPA 080009-003938 Mori Point 1 dog off leash 200009-004046 CF WPA 1 dog off leash in WPA 200009-004440 CF WPA 2 dogs off leash in WPA 070009-004440 Ocean beach 9 dogs off leash in WPA 080009-005320 Mori Point 2 dogs off leash ? Professional Dog Walker 260009-005332 Simonds Lp 1 dog off leash 080009-005711 Mori Point 1 dog off leash 270009-005770 JK Playground 1 dog off leash 080009-006031 Mori Point 2 dogs off leash 260009-006337 Ecology Trail 1 dog off leash 260009-006338 Ecology Trail 1 dog off leash 260009-006341 Ecology Trail 1 dog off leash 170009-006350 Sweeney R. 1 dog off leash 230009-006410 Magazine Rd. 7 dogs off leash in on-leash zone Professional Dog Walker 260009-006483 Ecology Trail 1 dog off leash 260009-007070 Ecology Trail "several" dogs off leash Professional Dog Walker 270009-007073 Ecology Trail 2 dogs off leash 260009-007411 Ecology Trail 1 dog off leash 260009-007597 CF WPA 1 dog off leash in WPA 200009-007783 CF WPA 1 dog off leash in WPA 200009-007796 Ruger @ Lombard 8 dogs off leash 170009-007860 Mori Point 1 dog off leash 200009-008194 CF WPA 1 dog off leash in WPA 070009-008395 Ocean Beach 3 dogs off leash in WPA

230009-008495 Pops Field 2 dogs off leash in on-leash zone 020009-009384 Aqua. Park 1 off leash dog in on-leash zone, false service dog info provided 070009-009572 Ocean beach 2 dogs off leash in WPA 170009-009573 Milagra Ridge 1 dog off leash 070009-009810 Ocean beach 1 dog off leash in WPA 200009-009962 CF WPA 2 dogs off leash in WPA 070009-010105 Ocean beach 1 dog off leash in WPA 200009-010154 CF WPA 2 dogs off leash in WPA 260009-010253 Ecology Trail 8 dogs off leash in on-leash zone, Professional Dog Walker given one citation 060009-010471 Sutro Heights 1 dog off leash in on-leash zone 200009-010750 CF WPA 1 dogs off leash in WPA 070009-011324 Ocean beach 1 dog off leash in WPA 080009-011749 Mori Point 1 dog off leash 070009-011753 Ocean beach 2 dogs off leash in WPA 070009-011807 Ocean beach 2 dogs off leash in WPA 030009-011814 Ft. Mason 4 dogs off leash in on-leash zone 140009-011877 Muir Beach 1 dog off leash in on-leash zone 260009-011995 Ecology Trail 1 dog off leash in on-leash zone 260009-011995 NW Pres. Golf Course Several dogs off leash in on-leash zone ? Professional Dog Walker 260009-012005 Ridge Trail 1 dog off leash in on-leash zone 260009-012057 Central Mag. Rd. 8 dog off leash in a WPA, one cite ? Professional Dog Walker 030009-012410 Ft. Mason "several" dogs off leash in on-leash zone 030009-012417 Ocean beach 1 dog off leash in WPA 030009-012853 Ft. Mason "several" dogs off leash in on-leash zone 030009-012974 Ft. Mason 1 dog off leash in on-leash zone 140009-012980 Muir Beach 1 dog off leash in on-leash zone 260009-012983 Ecology Trail 1 dog off leash in on-leash zone 260009-013031 Ecology Trail 1 dog off leash in on-leash zone 070009-013270 Ocean beach 1 dog off leash chasing wild birds 030009-013391 Ft. Mason 1 dog off leash in on-leash zone 030009-013393 Ft. Mason 1 dog off leash in on-leash zone

Off-leash dogs are more likely to leave behind dog feces in the park, reducing the recreational value of the GGNRA: 17000001957 Mori Pt 4 off leash, 1 defecated in restored habitat 230009007425 Baker Beach, off leash, dog feces covered with sand 13000907466 Tennessee Valley dog in no pets area, failure to pick up feces 070009008449 Ocean Beach failure to remove dog feces 070009005080 Ocean Beach 2 dogs off leash, left dog feces, no bags to pickup 150009-001375 Stinson Beach 1 dog off leash & owner refused to pick up feces 230009-004742 Crissy Field Dog owner neglects to pickup off leash dog's feces 13000907466 Tennessee Valley dog in no pets area, failure to pick up feces

Other: 150009001126 Stinson Beach solar powered lamp installed where 2 pets buried

Correspondence ID: 3816 **Project:** 11759 **Document:** 38106
Received: May,29,2011 20:02:29
Correspondence Web Form

Type:

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

It is crucial that the National Park Service arrange for an INDEPENDENT ORGANIZATION TO EVALUATE AND ANALYZE PUBLIC COMMENTS submitted for the Draft Dog Management Plan/Draft Environmental Impact Statement.

Many of the public comments point to false statements made by GGNRA staff regarding the facts on the ground at various GGNRA sites. GGNRA staff also made countless speculations in the DEIS that are unsupported by any evidence. GGNRA staff made numerous false and misleading literature citations in the DEIS to make it appear that there is evidence supporting unsupported statements. It is absolutely unacceptable for the same GGNRA staff to evaluate the veracity of their own statements.

At your open house event at Fort Mason, I pointed out to staff (from the organization that prepared the DEIS) specific false statements in the DEIS that came from GGNRA staff. I was told to "put that into a comment." I asked how they would evaluate my comment to decide if what I said was true. The response was that they would ask Daphne Hatch. Since I was pointing out false statements whose origin was Daphne Hatch, that was a bizarre response.

The level of bias displayed by GGNRA staff against all off leash recreation in the GGNRA leaves them with no credibility to evaluate their own pseudo-scientific arguments.

A committee of the National Academy of Sciences recently evaluated the work of National Park Service scientists regarding oyster culture in Drakes Bay. NAS reported in a news release, May 5, 2009, that, National Park Service scientists, "selectively presented, overinterpreted, or misrepresented the available scientific information," and, "exaggerate[ed] the negative and overlook[ed] potentially beneficial effects." The work of GGNRA staff that appears in the DEIS is at least as egregious as that evaluated by NAS.

Without independent evaluation and analysis of public comments, the whole NEPA process, the final EIS, and the policy resulting from it, can claim no credibility as unbiased or science based.

Sincerely, Keith McAllister Oakland, CA 94611

Correspondence ID: 3817 **Project:** 11759 **Document:** 38106

Received: May,29,2011 20:23:15

Correspondence Type: Web Form

Correspondence: I frequently visit GGNR areas with my dog and really appreciate having beautiful spaces to take a dog. I always keep her on leash and have never encountered an off-leash dog that was aggressive. Still, for the sake of preserving fragile habitats, I would support requiring all dogs be on leash, and perhaps limiting the number of dogs per visitor to ensure that they can be under full human control at all times (which would mean commercial dog walkers would reduce their use of the parks.)

I encourage the committee to consider options that would still allow visitors to bring 1-2 leashed dogs into GGNR areas.

Correspondence ID: 3818 **Project:** 11759 **Document:** 38106

Received: May,29,2011 20:32:26

Correspondence Type: Web Form

Correspondence: This plan would have a severely negative impact on my family. Fort Funston is the **only** place in San Francisco that I can let my dogs run off leash. One of my dogs doesn't do well in enclosed dog parks, and the other has problems with recall. (The cliffs on the beach keep her from getting off of the beach.) There is no other place that I can take both of them- not even an open space like the dog park at Stern Grove. I would need to drive much further to find a place to let them run free (negative environmental impact from extra mileage by car). If there haven't been major problems with dogs, dog walkers, and dog owners in Fort Funston, I don't understand why you are considering this draconian policy.

Ft Funston (and the rest of the GGNRA within SF) are located in a dense urban setting. Policies at these parks should reflect that reality. Specifically at Ft. Funston, if your draconian policy is adopted, the number of visitors to that park will **plummet**. From all of the time I have spent there, it seems like nearly everyone is either walking a dog(s) or hang gliding. The steep access to the beach makes the park unfriendly to families, especially those with young children or seniors. The number of protected native plants or animals is minimal.

If anything, you need to remedy the unsafe parking and traffic conditions on Skyline Blvd. The lower parking area (at the intersection of Skyline Blvd and John Daly Blvd) is really unsafe. More parking spaces are needed north of that intersection (where the fire lane is now), so that people don't have to

get on the highway/Skyline Blvd just to turn around. Pulling out of any of the parking spots along Skyline Blvd is dangerous. In order not to be hit from behind, cars need to back into traffic travelling at highway speeds, and get to highway speed in a very short distance. I have personally almost been rear-ended on multiple occasions.

There also needs to be a two-way intersection built across Skyline Blvd directly outside of Ft. Funston's entrance. The sight lines in this location would actually be safer than where cars are forced to turn in order to go north on Skyline Blvd (outside of the country club). I have also personally felt very unsafe on occasions making that u-turn - there just isn't enough time/space to get up to highway speeds. There is enough unused space in the highway median so that turn pockets and queuing lanes can be built in order to allow turning movements in all directions. With long enough turn pockets, the intersection wouldn't likely need to be signalized. Failing these measures, the GGNRA needs to work with local jurisdictions (and Caltrans?) to examine drastically reducing the speed limit on the section of Skyline Blvd from where it begins to the first left turn in Daly City.

Lastly, there needs to be more transit access to Ft. Funston, both at the entrance to the park at the intersection of Skyline Blvd and John Daly Blvd., and into the main entrance. If you are examining the environmental impacts that park users incur, please also examine how public transit access could be bolstered.

Bike access also needs improvement. Given the recreational nature of the area and how many cyclists use the road, Skyline Blvd should have a dedicated bike lane. I have seen bicyclists almost get hit. If there aren't any secure bike parking facilities in Ft. Funston, this needs to be examined as well.

Correspondence ID: 3819 **Project:** 11759 **Document:** 38106

Received: May,29,2011 20:36:18

Correspondence Type: Web Form

Correspondence: Hello, I live in montara and have been walking my dog in Rancho Corral de Tierra for the past ten years. 80% of the people walking in this area have dogs. In fact, many of the people without dogs are happy to see and pet other peoples dogs. We do not have a local park or rec center. Rancho is the one place people in Montara meet up, socialize and form a community. There is nowhere safe to walk my dog in Montara, other than Rancho. Walking in the neighborhood, requires walking in the street with cars going by. My 2 1/2 year old son loves to go on walks with our dog Max. If we had to walk in the street, he would miss out on that wonderful pastime. I request that Alternative E (in the dog management plan) be adopted for Rancho

Corral de Tierra. Anything else, would adversely affect all the residents of Montara. Bike riders, horse back riders, walkers, runners and dog walkers have co-existed in harmony for many years. Please do not change what is working.

Sincerely, Christa Livingstone

Correspondence ID: 3820 **Project:** 11759 **Document:** 38106

Received: May,29,2011 20:50:57

Correspondence Type: Web Form

Correspondence: To whom it may concern,

I am a dog owner.

It's important to have open space places for the Moose and I to romp, and there is so little of it to be had. Please do not restrict open space for off leash dog access.

I vote.

Best regards, Molly Burke

Correspondence ID: 3821 **Project:** 11759 **Document:** 38106

Received: May,29,2011 20:51:10

Correspondence Type: Web Form

Correspondence: I am writing to comment on your plan concerning hiking with one's dog off leash. My particular interest is the newly acquired Rancho Corral de Tierra lands.

I am a 74-year-old woman with moderate hearing loss. These facts are pertinent because age and disability are frequently cited as reasons for not allowing dogs off leash on GGNRA lands. I hike several times a week with my dog off leash on the Rancho Corral de Tierra land between Montara and the McNee Ranch State Park.

While this is a pleasure for both of us, the more important facts relate to health and safety for me. The pleasure motivates me to get the vigorous exercise that benefits an older person. The varied terrain at Rancho Corral de Tierra makes for a good hike in conditions that are not readily available elsewhere on the coast when walking with a dog. With my dog off leash we can precede a pace best for both of us ? me slowing some on the hills and

my dog chasing her ball.

Because of my hearing loss I wear hearing aids, these of course help but do not restore normal hearing and may occasionally be a handicap due to wind noise. My dog alerts me to what is happening around me. She has helped me avoid both mountain bikers and horseback riders on narrow sections of trail. And she tells me when other hikers and dogs are approaching. She comes readily to lead so I can leash her if necessary. Both of us are safer together. Further as a woman I feel safer hiking with my standard poodle.

I contribute to the community that has developed in Montara among off leash dog folk by maintaining one of the dog waste stations. I supply waste collection bags and empty and pack out accumulated waste. Such a sense of community and of responsibility for one's community seems to me to be something our government needs to make special effort to support.

My fear is that further restrictions to off leash dog hiking in GGNRA will have a negative impact on those few areas that remain available. And, in my case will necessitate a long drive to some area where I can hike comfortably with my dog - not a good choice economically nor for the environment.

My plea is for people not dogs. My hope is to continue to enjoy my choice of recreation, hiking with an off leash dog, - recreation that contributes to my health and well-being and that of the many others I meet on the trail.

Correspondence ID: 3822 **Project:** 11759 **Document:** 38106

Received: May,29,2011 20:54:03

Correspondence Type: Web Form

Correspondence: I oppose any further restrictions on dog walking. Off-leash areas should be expanded, not eliminated. The public lands exist for the enjoyment and recreation of the public. The use of public lands must be undertaken responsibly so as not to infringe upon the enjoyment of others or damage the public lands so they can't be enjoyed by future generations. Dog walking, when undertaken responsibly, does not have any greater impact than people walking without dogs. Responsible people keep their dogs under control and clean up after them. Irresponsible people are themselves out of control and do not clean up after themselves. Unless you are prepared to ban all people from parks or severely restrict their movements based on the bad behavior of a few people, please do not target a specific group of people who only want to enjoy the public lands (that they own) together with their four-legged companions. As a nation, we have adopted these creatures as our companions and they bring us great benefit. Dogs provide unconditional love and acceptance, unending entertainment, and motivation to get out of the house, exercise, unplug, and enjoy the real world. These are benefits to

individuals and benefits to society. With all of the negative and harmful activities that take place on public lands, and throughout society in general, it is simply beyond reason why a positive and harmless activity has been selected for new rules and restrictions. For dog lovers, and there are a lot of us, our outdoor activities center around walking our dogs. We walk and explore together and we enjoy the freedom together. Banning dogs from certain areas and restricting dog walking to a leash only activity in other areas may seem like a ban or restriction on dogs, and that is bad enough, but the effect is that it bans a targeted group of people from those areas, and that is discriminatory and unreasonable. Any harm that you can identify that is caused by off-leash dog walking, I can match with an equal or greater harm caused by people walking without dogs. Please reconsider your proposed action in this light. I believe that when you weigh the real benefits of off-leash dog walking against the imagined harm you will see that this is an activity that should be allowed to continue.

Correspondence ID: 3823 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean,

My name is Georgette Petropoulos and I've lived in San Francisco my entire life. My family got their first dog when I was a young teenager in the 1960s. That's when we discovered Fort Funston and Baker Beach. For more than 40 years my family, friends and I have enjoyed these open spaces along with our dogs.

One thing that has always been apparent, especially at Ft. Funston, is the sense of community and safety one feels there. It is generally cold and windy, and if not for the people with their dogs and hang gliders, it would be desolate. Throughout the years I've met many elderly people who go to Ft. Funston because they feel safe among the dogs and their owners. I have been a member of the Sierra Club for many years, and preserving our native habitat and species is important to me. However, I do not believe that dogs are having a negative impact on the flora and fauna throughout the GGNRA, especially since the percentage of space available for off-leash recreation is so minimal.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based

on any documented impacts of non-compliance, just the mere fact that non-compliance occurs. Because it will change the status of areas from off- to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written (there is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers), and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration.

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| Correspondence ID: | 3824 | Project: 11759 | Document: 38106 |
| Received: | May,29,2011 20:58:49 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I have been a responsible dog owner for nearly 30 years and I am always amazed by the bias shown toward dogs. To be well-behaved members of society, dogs need open space to exercise and interact with other dogs, yet this freedom is constantly being threatened. In my experience, dog owners tend to be more environmentally conscious than your average person so why are we being targeted? We clean up after our dogs and we make sure our dogs don't bother people. We take our responsibility seriously. What we get in return is priceless -- the look of sheer joy our beloved canines get when running on the beach and the contented calm they have on the drive home. I have experienced the profound impact it has on my life and that of my dogs when areas we once enjoyed are made unavailable to us. We have not done anything that justifies having this privilege taken from us. On the contrary, I see many humans without canine companions ravaging the environment. It sickens me to find a pristine beach littered with garbage and broken bottles, yet humans are not being banned from these areas. The changes being proposed by GGNRA are simply unfair to dogs and their owners. | | |

Correspondence ID: 3825 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I am a 67-year-old native San Franciscan who has enjoyed walking with my dog at Baker Beach and Ft. Funston for more than 40 years. I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation.

Correspondence ID: 3826 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose certain provisions of the GGNRA's draft dog management plan, particularly the "preferred alternatives" for GGNRA-administered areas in San Mateo County. The proposal to ban dogs completely from "New Lands" (aka Rancho Corral de Tierra) is especially draconian and would be punishing to the local communities. The preferred alternatives for Mori Point, Milagra Ridge, and Sweeny Ridge and Cattle Hill also seem to consist of arbitrary and capricious restrictions on current regulations and practices.

It is disturbing that the preferred changes do not appear to be based on actual, documented impacts, but rather on generalizations and assumptions. There is also a distinct lack of fuller context: the possible impacts of dogs are not discussed relative to the impacts of all users (i.e. people), nor are the well-documented physical and mental health benefits of pet ownership and dog walking considered.

The primary underlying assumption of the draft dog management plan appears to be that the open space areas administered by GGNRA are the

equivalent of pristine wilderness National Parks, such as Yosemite. To the contrary, the GGNRA was intended to provide urban recreation areas, serving both recreation and conservation ? a goal that is totally achievable.

Rancho Corral de Tierra, in particular, has a 300-year history as ranchland. Cattle, horses, and dogs have all been historically present; generations of local residents have recreated on these lands, without destruction of wildlife or degradation of the environment. The draft dog management plan acknowledges that no huge influx of new visitors to the area is expected. Therefore, the proposed ban on dogs in this area is unlikely to serve any beneficial purpose and only creates an unnecessary source of conflict between GGNRA and local residents. Banning dogs from these areas effectively bans dog owners. People who want to hike with their dogs won't go where they cannot take them. Thus the draft document proposes to ban significant numbers of people from enjoying the open space that surrounds their neighborhoods.

Overall, the GGNRA draft management plan does not provide evidence to justify such drastic changes to many years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Leashed dogs should be permitted on all groomed trails, unless there is clear, site-specific evidence of harm caused by dogs over and above the impacts caused by other recreational users. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Consider dog walking in the context of impacts caused by all recreational activities. Consider the impacts of dog walking relative to the benefits of pet ownership and dog walking. Banning dogs from an area effectively bans their owners, which means a significant portion of the human population would be left without access to recreation. ? Align rules for professional dog walkers, as well as others walking multiple dogs, with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. Ticket those who violate leash-only areas and "pooper scooper" regulations, rather than punishing entire communities for some arbitrary number of dog violations. Changes to dog policies should be based on objective data indicating actual harm, not on some whim-based rubric.

These are my personal comments and observations regarding this plan:

In addition to being a dog owner/walker, I am also an equestrian. I have ridden my horse on the trails of Rancho Corral de Tierra regularly over the past five and a half years. My horse and I have encountered hundreds of dog walkers during this time, with dogs both on and off leash. Only a handful of

those encounters have been less than perfectly pleasant, and none have required any more action on my part than waiting quietly for the owner to get their dog under control. I do not believe that the vast majority of responsible dog walkers and their pets should have to suffer for the inattention of a few.

My horse isn't bothered by dogs, she is more often disturbed by the shrill voices of shouting children as they run and play along the trails. In all honesty, I find the noise levels made by some of the other park visitors and their families disturb my enjoyment of the outdoor experience. But I would never suggest that children be banned from all or any part of GGNRA lands. Of course they should be there to get exercise and learn an appreciation for our beautiful environment. There is room for all of us: hikers, bicyclists, equestrians, and dog walkers to share the trails while protecting sensitive environments.

Correspondence ID: 3827 **Project:** 11759 **Document:** 38106
Received: May,29,2011 21:17:03
Correspondence Type: Web Form
Correspondence: Comment GGNRA Draft Dog Management Plan / Environmental Impact Statement

Brief Overview of Comment Thank you for your hard work trying to balance the various interests at stake regarding dog management in the GGNRA. I am a weekly user and lover of Fort Funston as well as a frequent user of many of the other GGNRA areas. I am an active environmentalist and supporter of local environmental organizations, a physician caring for women and children, and an owner of a dog. As such, I believe that I have a balanced perspective of the competing interests at stake in the management plan. My comment has two specific points: 1) the "preferred alternative" at Fort Funston is not a good compromise because it is too overly restrictive of Regulated Off-Leash Areas (ROLA) and, as such, undermines the stated goals of the process (e.g., maximizing visitor experience and reducing user conflicts); and 2) the "Compliance-based Management Strategy" is an utterly unfair aspect of the plan and must be removed if the plan is to be considered fair and acceptable to the many interested parties. I believe that an acceptable compromise is achievable, and would better serve the interests of all involved, with fairly minimal changes if the GGNRA is open to re-examining certain aspects of plan.

Who I am My name is Edward Machtinger and I live in the Mission District of San Francisco. I am a physician and an Associate Professor of Medicine at the University of California, San Francisco (UCSF). At UCSF, I direct the Women's HIV Program which provides primary care to a large number of

women and girls living with HIV/AIDS. I am also an environmental activist. I am a regular and dedicated contributor to the Bay Institute, a leader in protecting, restoring and inspiring conservation of the San Francisco Bay and its watershed . I have published many letters to the editor in newspapers that specifically address habitat and the environment. I am a donor to many other organizations dedicated to preserving habitat for endangered animals and believe that this issue, habitat preservation, is among the most important of our time. I am gay and married to another San Francisco resident who is an elementary teacher at a public school in the City. I am also a dog owner; we adopted a dog from the San Francisco Animal Control named Poka. At least once each week for the past many years, my husband and I have taken Poka to Fort Funston for over an hour of hiking and nature appreciation. Taking Poka to the ROLA at Fort Funston is the single most important and frequent activity in which my husband and I engage the natural world. We also frequent the Marin Headlands for hikes together with Poka. I believe that I have a very reasonable perspective of the competing interests at stake in the Dog Management Plan because I have longtime dedication to: 1) the care and safety of vulnerable people; 2) habitat preservation; and 3) the importance of being outside in nature with our dog.

My two comments 1. The "preferred alternative" at Fort Funston is not a good compromise because it is too overly restrictive of Regulated Off-Leash Areas (ROLA)

Simply stated, the preferred alternative is not a good compromise. I believe the intentions of those that chose this alternative are honest and well intentioned. However, the principal reason to restrict ROLA, environmental preservation, can be achieved by far less restrictive means such as improved fencing, signage, and enforcement. In truth, it appears like these less restrictive methods have not been tried. Preserving ROLA at Fort Funston is particularly important because it is one of the most popular sites in the GGNRA for ROLA. If adequate ROLA is preserved at Fort Funston, many of the other newly proposed restrictions on ROLA at other GGNRA sites will be more tolerable and acceptable and local City resources will not become overwhelmed.

Specifically, the preferred alternative does not provide adequate ROLA in the areas above the beach and does not provide an option to have a dog on voice control in a loop from one's car to the beach and back. The preferred alternative requires park visitors to leash their dog for long stretches in order to access the ROLA on the beach. This is very problematic because it is FAR safer , and less conflict inducing, for a dog to be under voice control instead of on leash while traversing narrow trails and walking down the steep grade to the beach. Unnecessarily leashing unaggressive dogs can impede the experience and safety of park visitors because it is far safer for the dog and visitor to travel across these areas untethered to one another. I

fear that older people, or people with disabilities, will be forced to tether themselves to their dog while walking across difficult terrain and will injure themselves as a result or simply not be able to spend time in nature.

Reducing these restrictions in ROLA on the trails to the beach and above the beach do not appear to negatively impact the core environmental goals of the plan, including protecting the habitat of vulnerable animals. Environmental and safety issues of having ROLA on the trails and above the beach, to the degree that these issues exist, can be addressed through better signage, education, and enforcement.

I strongly suggest adopting the least restrictive option for Fort Funston that allows for a loop of ROLA from one's car to the beach and back (Alternative A or at least alternative E). Doing so would acknowledge the unique and important experience of the many park visitors, like my husband and me, who rely on ROLA at the GGNRA for their principal experience in nature. Furthermore, preserving ROLA at Fort Funston would be a signal that the GGNRA values the experience and perspective of many caring and environmentally-interested dog owners like myself and would make restrictions on ROLA at other sites more acceptable and make it much more likely that the end result of the plan will be a coming together of all parties to support the compromise. I would also strongly suggest incrementally less restriction on dogs on Marin headlands trails. The potential environmental damage to the environment of leashed dogs on these trails to protected butterflies is not evidence-based and is likely completely unrealistic. As such, I strongly suggest adopting alternative A or E at this site as well.

2. The "Compliance-based Management Strategy" is an utterly unfair aspect of the plan and must be removed if the plan is to be considered fair and acceptable to the many interested parties

Including this provision would be considered by many, including myself, to be "poison pill" for the plan. The responsibility for enforcing the plan is in the hands of the GGNRA. If people do not abide by it, the GGNRA is responsible for escalating measures to ensure its enforceability. These measures could include fines, fencing, education, convening meetings of community members, and many other options. Community members do not, and should not, be ultimately responsible for the plan's enforcement. The community CAN support the plan and HELP enforce it through peer pressure and other means. However, for the community to act in this way, the GGNRA needs to enact a fair plan to engender the community's trust and "buy-in". It is simply unfair and wrong to put in a provision that allows for the entire process to be subverted, and the compromises unilaterally redrawn, because the GGNRA cannot live up to its ultimate responsibility to enforce the rules. I strongly suggest removing this provision from the plan. Doing so would be a sign that the GGNRA, despite, at times having

differences of opinion with some in the community, are nonetheless community partners with many shared values.

Thank each of you again for your hard work for the preservation of our country's beautiful outdoor and recreation spaces.

Warmly,

Edward Machtinger, MD

Correspondence ID: 3828 **Project:** 11759 **Document:** 38106
Received: May,29,2011 21:20:04
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean,

I have submitted a letter about the DEIS, with what I hope are substantive comments.

However, I would like to make a comment about the whole process. The GGNRA, which is funded by taxpayers and is supposed to be working for the people of this country, has been extraordinarily biased in its presentation of the DEIS. Clearly, the Park Service's preference is for no dogs, period. That is evident by the restrictive Preferred Alternative and by the "poison pill" aspect of the plan which states that if the Park Service determines that there is a certain percentage of non-compliance with the rules that are decided upon, then the Park Service can just change the rules with no public input.

The crowning arrogance was the sign that has been put up at Crissy Field recently that says that dog owners cannot use the outdoor showers. There was no announcement of this in the press. There are no reasons given, just the sign that prohibits using the showers. Why is this a new rule, after YEARS of happy co-existence between families with small children who need to be rinsed off, windsurfers that want to shower, and dog owners with sandy and salty dogs, each waiting their turn and gratefully sharing the resource?

In this age when technology makes it so easy to communicate, why didn't the GGNRA leadership say what the problem was, and ask its public to help come up with solutions?

Our national parks are wonderful and we all want to help keep them that way. The National Park Service and the GGNRA could use some work.

Sincerely, Mary Gregory

Correspondence ID: 3829 **Project:** 11759 **Document:** 38106
Received: May,29,2011 21:27:56
Correspondence Type: Web Form
Correspondence: Our Economy has taken a toll on us all, and I know the Recreational Parks that we all use and appreciate is the main issue. That is I am writing this to you all. I wish that we can just leave it alone. There are a lot of old people that walk their dogs. We all have met each other at this parks, and so I ask that you reconsider stopping the whole issue.

Correspondence ID: 3830 **Project:** 11759 **Document:** 38106
Received: May,29,2011 21:34:42
Correspondence Type: Web Form
Correspondence: I am writing because of GGNRA trying to make dogs on lease on GGNRA property. I am so against GGNRA trying so hard to close Fort Funston to off leash dogs. I have gone to this place with my dogs and friends dogs for years/ since 1970. Since before the city let GGNRA take over the park area including the beach, Crissy Field, and Lands End. I have gone to all those areas for years. You did close Lands End. Not happy but we still had beach area, Crissy Field, and Funston. I know when GGNRA was given the property it was to be kept friendly to use as it has always been. I listened then .. and have been gradually seeing GGNRA trying to put it in line with other National Parks. Never was to be. Never had problems with GGNRA when it had head quarters at the Cliff House. Started after you moved to Ft Funston. We know we where suppose to be able to continue walking our dogs there. You say the birds are harassed by the dogs they obviously are moving because the winds are flattening their nest ...The ice plant is not native but it protects the sands and is sturdy. So kids, people, and dogs can all have fun over the dunes and not worry about destroying something. Have small areas fenced to show off native plants. Don't stop us from running and enjoying the place. Even schools come out there to exercise. And I think most (not all) clean up dog poop/ but they have a cleanup every Saturday. So I can only stay do not do it. It is not necessary to make it like other national parks... its not suppose to be.

Correspondence ID: 3831 **Project:** 11759 **Document:** 38106
Received: May,29,2011 21:36:10
Correspondence Type: Web Form
Correspondence: I strongly support the GGNRA dog management plan. The parks and

recreation areas of the bay area must be balanced between people and pets. Dogs are harming the natural habitat of native species in many areas. Elderly people, young children, and disabled people need recreation areas where they are not threatened by off-leash aggressive dogs. Far more people in SF do NOT own dogs compared to those who do own dogs. It is courageous of the GGNRA to resist the disproportionate political influence of the activist dog groups.

Correspondence ID: 3832 **Project:** 11759 **Document:** 38106
Received: May,29,2011 21:45:07
Correspondence Type: Web Form
Correspondence: Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I have owned dogs my entire life. I have lived in San Francisco for 31 years and first owned a basset hound here, and currently own a Labrador retriever, always taking her on walks through the Presidio and to Crissy Field. I am devoted to the preservation of the extraordinary natural environment that makes San Francisco such a special place to live and work and play but I am also devoted to the idea that the area in which the Presidio National Park resides is not a monoculture ? it is diverse. That diversity is the key to its richness and promise; that diversity is also the signature feature of this park: the only urban national park in the country. That diversity means there should always be a place for dog owners to walk their dogs off-leash as long as they are under voice and sight control and the owners are responsible and clean up after them.

Today I saw a new sign at the outdoor shower on Crissy Field saying dogs were prohibited: this is outrageous! I have been washing off my dog in this shower since the shower was built and there has never been any problem between dog owners and other users -- wind surfers, parents and children, etc. The definition of a healthy community is learning to get along with different populations and this is a healthy community. There is no reason dogs cannot be hosed off at the outdoor showers. That sign should be removed immediately.

Moreover, I do not agree with the GGNRA's current preferred dog-related alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) are not based upon sound science or long-term

monitoring of site-specific conditions.

I am all for the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options besides restricting dog-walking access should be considered first. I think the GGNRA should provide better signage and create more environmental barriers where necessary, such as the vegetative barriers surrounding the tidal marsh at Crissy Field. In my many years of walking my dog I have seen an off leash dog in such an area only once, and even then the dog owner quickly brought the dog back under control. That is remarkable, and does not justify the restrictions being put forth in the GGNRA's preferred alternative.

As a responsible dog owner, I keep my dog under voice and sight control, clean up after her, and keep her out of the fenced dunes and vegetative areas. It is important that areas like Crissy Field remain open for off leash dog walking access. I know it is vitally important that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well-behaved dog. Recreation is part of the public mandate and a key part of recreation is recreating responsibly with one's dog.

Having places where I can take walks with my dog allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA we currently have (approximately 1% of the total acreage of the GGNRA), I am very concerned that many dogs and dog owners will not have sufficient opportunity to exercise and recreate.

Some specific problems with the DEIS include the following points. Please revise the DEIS to correct these errors.

1. This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.
2. The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. I feel the DEIS should include an alternative along these lines.
3. The proposed "compliance-based" approach should be modified to create

a baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

4. I feel the DEIS is not taking into account the potential effect of restricting off-leash dog walking on San Francisco's public parks, which could see a huge influx of dogs as a result. The GGNRA cannot do its planning without thinking of other neighboring recreation areas, such as the public parks, particularly in this time of limited resources.

5. The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

6. The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts ? other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors.

7. The DEIS needs to provide full disclosure to the public and decision makers. If dog-related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone ? so that an informed decision can be

made.

8. The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site-specific information that these areas are inappropriate for continued dog walking.

Many people have worked diligently both together and separately to study the DEIS and to make thoughtful comments on its findings, in hopes of encouraging the National Park Service to rethink and more carefully document its stance. The outcome of this plan will have an important effect on the quality of life for everyone in the Bay Area. I urge you to support Alternative A with individual consideration for any new lands, for the sake of the health and recreation not only of thousands of Bay Area residents and their canine companions, but for everyone who enjoys the GGNRA.

Thank you for your time.

Sincerely,

Daniel P. Gregory San Francisco, CA 94118

CC: Representative Nancy Pelosi Senator Dianne Feinstein Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director District 1 Supervisor Eric Mar District 2 Supervisor Mark Farrell District 3 Supervisor David Chiu District 4 Supervisor Carmen Chu District 5 Ross Mirkarimi District 6 Supervisor Jane Kim District 7 Supervisor Sean Elsbernd District 8 Supervisor Scott Wiener District 9 Supervisor David Campos District 10 Supervisor Malia Cohen District 11 Supervisor John Avalos Mayor Ed Lee

Correspondence ID: 3833 **Project:** 11759 **Document:** 38106

Received: May,29,2011 21:59:10

Correspondence Type: Web Form

Correspondence: San Francisco is a tiny city, densely populated, with immoveable boudaries on three sides that can only be crossed at considerable effort and expense. San Franciscans have fewer cars than most CA citizens, do to cost and parking restriction. San Francisco residents, both 2 and 4 legged, have the least amount of recreational space of any major metropolis.

GGNRA now proposed to further reduce the space available for residents who own and exercise their dogs, an activity that is healthy and necessary for both human and canine. It is also free. The city provides space for

golfers, tennis players, children and tourists. It cannot provide enough space for dogs to offset the limitations being proposed.

I love our National Parks, and I am a docent at a GGNRA site, but I do not condone the implicit concept that GGNRA should be operated like a national park. It is NOT, and while San Francisco has always welcomed tourists and visitors, it cannot always be thru the sacrifices and quality of life of its beleaguered residents.

Please give the dogs the range that they have historically enjoyed. Visitors who don't like dogs have LOTS of places to enjoy. The dogs and their owners have precious few acres, and need more, not less. Thank you.

Correspondence ID: 3834 **Project:** 11759 **Document:** 38106

Received: May,29,2011 22:05:34

Correspondence Type: Web Form

Correspondence: I have been a long-time environmental advocate and care deeply about our nation's natural resources. I am also a responsible dog owner.

Frankly, I am tired of being excluded from our National Parks. I travel with my dogs and they need and want to be with me. The policy of the NPS prohibits me from enjoying the wonders of our parks by prohibiting me from walking my dogs with me on park trails.

The current proposals to restrict my access to ocean front property in San Francisco is beyond comprehension. I understand the need to protect natural resources, but excluding me and my dogs from Fort Funston doesn't accomplish that goal.

Everywhere I go I see PEOPLE doing things that are injurious to the environment. Banning dogs from anywhere does not prohibit PEOPLE from causing harm.

Please reconsider your proposal to restrict access for dog owners and their dogs at Fort Funston. It is just not fair, just or reasonable.

Dena Mossar

Correspondence ID: 3835 **Project:** 11759 **Document:** 38106

Received: May,29,2011 22:09:55

Correspondence Type: Web Form

Correspondence: I am a fourth generation San Franciscan and a second generation Sunset

District resident. Although I no longer walk on the beach or at Fort Funston with a dog, I spent many years doing just that sometimes up to 3 times a day. From all my research into the so-called environmental reasons for banning or severely limiting dogs from these and other GGNRA areas, I see no valid reason for it. I urge you to allow dogs in the areas that were outlined for off-leash dog recreation back in 1979. And I urge you to keep the RECREATION in our area. You are guests in our backyard, not the other way around.

Thanking you for your understanding.

Denise Selleck

Correspondence ID: 3836 **Project:** 11759 **Document:** 38106
Received: May,29,2011 22:10:30
Correspondence Type: Web Form
Correspondence: Recreation with dogs is not just recreation for dogs - it is for the people with the dogs (dare I day dog owners) also.

Walking (with or without a dog) lowers blood pressure, lowers rates of chronic and costly diseases, and has many other positive effects. We should be encouraging people to recreate with their dogs - not constantly attacking it.

Particularly in the case of Fort Funston and many other areas, these are former military bases. The are not undisturbed wilderness areas. To pretend otherwise is somehow to ignore the facts.

Please preserve the current system that allows people to recreate with their dogs at Fort Funston and in all other areas currently allowed.

Correspondence ID: 3837 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Since the park is home to such an unusually large number of endangered and threatened species (and since the park's mission is to protect natural and cultural resources) I feel that:

--Alternative D best reflects the national park values.

--The compliance rate should be 95%, not 75% as outlined, to protect

endangered species wildlife habitat from human disturbance.

--The park should better accommodate diverse park user groups (such as runners, horseback riders, families, and those with service animals) by offering more than one trail and more beach areas free from dog recreation; by requiring all off-leash areas to be enclosed to protect park users, wildlife, and other dogs; and by limiting off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3838 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 29, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

For generations my family and friends have enjoyed walking and family outings on what is now known as the GGNRA. I voted for the formation of the GGNRA with the understanding that recreational activities (including off-leash dog walk and play) would continue in perpetuity. Please keep your agreement with those of us who voted for the GGNRA's formation. Our dogs are part of our family and we expect to include all of our family members when we go to Fort Funston, Muir Beach and other locations with friends and family. We have met so many wonderful people as we walk and play with our dogs. Frankly, were it not for our dogs we would seldom visit these areas, we wouldn't be so closely aligned with nature as we currently are, and we certainly wouldn't know so many of our fellow dog guardians and community members.

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the

community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to over 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for off-leash and on-leash dog walking other lands acquired by the GGNRA since 1979, especially in San Mateo County and on Muir Beach in Marin County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

As it is, we have access to only a very small percentage of the GGNRA --- only 1%! People who do not want to be around dogs at all have 99% of the GGNRA lands to enjoy. Families with their dog companions have access to only 1%. You have not presented any convincing evidence in your documentation that indicates a reasonable and honest argument for reducing access to the current 1%, or for that matter a change to the 1979 Pet Policy.

I stand in opposition to the proposed GGNRA draft dog management plan.

Sincerely, Francine Podenski Walnut Creek, CA 94595

Correspondence ID: 3839 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: The park's mission is to protect the natural and cultural resources, not allow recreation to undermine it. Alternative D best reflects the national park values. Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as proposed.

Please require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

Correspondence ID: 3840 **Project:** 11759 **Document:** 38106

Received: May,29,2011 22:47:39

Correspondence Type: Web Form

Correspondence: More of the GGNRA, especially at Fort Funston, needs to be protected from OFF LEASH dogs. I have no problem with dogs off-leash on the wide, asphalted trails, but dunes and coastal scrub need to be protected---fenced off,if necessary--- from the onslaught of off-leash pets. Also, wildlife such as the snowy plover need to be protected on the beaches during nesting season. For these reasons, I support the preferred alternative plan.

Furthermore, if concessionaires are required to pay for conducting their business within the borders of a national park, I don't see why professional dog walkers are allowed to conduct their business here free of charge. I feel that dog walkers should be required to buy a permit to use the parks.

Correspondence ID: 3841 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Frank Dean,

My name is Craig Shoji and I'm an avid user of the various GGNRA parks and beaches around me. Every morning I take my dog for a walk to Dolores Park and let him romp around off leash with his other dog friends. It's an amazing socializing experience for him as he's easily worked up when on leash and has shown signs of leash aggression to other dogs. When he's off leash he's extremely friendly and very good about helping dogs who are out of line. It's quite endearing and has been invaluable for him as a well behaved dog.

I also love going to Fort Funston and Baker beach to let him run around and make friends with the other dogs there. He's got wonderful recall and he's never a nuisance to the fishermen and local patrons of the beach. He loves exercising there, fetching balls and sticks and digging holes in the sand. I also love to take him on off leash hikes around the Marin Headlands and other hiking trails north of the Golden Gate. Ticks and foxtails aside, he's very well mannered on the trails and love to get out just as much as my wife and I do.

My dog is never being invasive of the environment of the wildlife habitats, and I frown on people who let their dogs erode the cliff sides at the beaches. I'm a huge fan of the environment (who isn't??) and preserving it, but I feel that can be done with a respectful balance from pet owners and people that frequent the parks. Sadly, a main part of the reason I love to frequent GGNRA locales is because they're off leash, and if that were to change I don't think I'd be as inclined to use the spaces.

Below is a statement that I wholeheartedly agree with:

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely,

Craig Shoji San Francisco, Ca 94114

Correspondence ID: 3842 **Project:** 11759 **Document:** 38106

Received: May,29,2011 23:00:06

Correspondence Type: Web Form

Correspondence: A mollusk snail, its appearance almost translucent, no larger than the first digit of my finger, inches along atop a leaf, trying to survive. Its antennae eyes react with caution to its environment. The Plan/DEIS is a long-overdue public policy that must be adopted to preserve these small creatures.

Correspondence ID: 3843 **Project:** 11759 **Document:** 38106

Received: May,29,2011 23:03:27

Correspondence Type: Web Form

Correspondence: Thank you for the opportunity to comment on the proposed dog plan. I live in the city of San Mateo. I visit the GGNRA regularly and in particular I walk the beach of Crissy Field. I consider myself sympathetic to (domestic and wild) animals' needs and have adopted shelter animals to be my companion pets since I was a child.

My dogs do not accompany me in public areas that do not allow dogs. My dogs have always been leashed in the public areas that allow for dogs. Leashes allow me to maintain control of my dogs. I understand that not everyone likes dogs. I also respect the fact that people can be frightened of dogs, partially dogs that are not leashed.

I consider myself a responsible dog owner and is the reason I am commenting on the proposed plan. To do so I believe describing my personal experience at GGNRA with unleashed dogs is the best way to substantiate my position on the plan.

Earlier this month while walking along the beach of Crissy Field, I was startled several times by unleashed dogs that came up behind me barking, this is not the first time this has happened to me and frankly does not add to my experience at the beach. On this particular walk I was almost knocked over by a dog as it ran into me chasing a ball. If the dogs were leashed I believe that I would not have been barked at and almost knocked over because people have more control over the dogs.

During this walk, and like so many others, I observed dogs eliminating themselves on the beach and the waste product left on the beach. I believe if the dogs are leashed then their human companions are more likely to pick up the waste. It could be in the unleashed situation that the human did not know

that the animal had gone to the bathroom. Regardless of the circumstances leaving dog waste behind poses a public health problem. Also seeing dogs eliminating themselves, wherever they choose, diminishes my experience at the GGNRA.

It is my understanding that Crissy Field and the GGNRA need to comply with the federal regulations such as the management and protection of endangered species. I fully support compliance with these laws. Based on my observation of unleashed dog behavior at Crissy Field and other GGNRA areas I am not convinced, based on my years of observation of dogs at GGNRA, that allowing unleashed dogs to run as they please can ever be compatible with these federal regulations. I do not know how the park service could realistically enforce this type of situation. This is further complicated with the federal budget cuts that could reduce the enforcement personnel at GGNRA.

I understand that GGNRA has allowed unleashed dogs on its grounds for many years and that this is unique within the federal park system. This is not a precedent, it is an aberration. I see no compelling logical reason to continue allowing unleashed dogs at GGNRA. San Francisco has dog parks throughout the city and suggest that those who prefer unleashed dogs to take their canine companions there.

As one who has visited the GGNRA over the years, it is clear that there is an increase in the number and variety of visitors who frequent GGNRA and that the quality of our visits also need to be taken into account. Just at paramount is the routine and sustainable enforcement of federal regulations such as the endangered species act.

I encourage the National Park Service to manage dogs at the GGNRA like it does its all of its other national parks. There should be no exclusion for GGNRA because no compelling reason exists for it.

Correspondence ID: 3844 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent?Golden Gate National Recreation Area?Fort Mason, Building 201?San Francisco, CA 94123-0022

Dear Mr. Dean, My name is Audrey Liu and I have lived in San Francisco for a little over 3 years. When I moved here, the first thing I did was adopt a dog from the local pound and I did it here, in San Francisco, because after living in New York City and Los Angeles, San Francisco seemed like the perfect place to have a dog. It's very rare that a city can afford its occupants

the luxury and pleasure of having a dog, but San Francisco stands out as one that does and does with great empathy and understanding. During these years, I've taken my dog to Dolores Park every morning for our routine walk. He goes to Fort Funston three days a week on his dog walks and I take him on regular hikes every month in Marin County. To prohibit his presence or limit our access to these great parks is not only depriving him of a proper livelihood, but me as well. I love my community, I'm a part of our neighborhood block association and regularly participate in neighborhood improvement projects.

There are bigger grievances at hand that should be considered before limiting access for our dogs to the park. Consider the fact that every morning, Dolores park is littered with trash-beer bottles, Bi-Rite shopping bags, picnic remnants. Perhaps we should reevaluate the impact of dogs on these parks and consider the impact of people. I pick up after my dog and I simultaneously have to keep him from getting into a heap of trash that a group of kids left the night before. I have to keep him from approaching a homeless person who is crawling in and out of the bushes (destroying the beautifully cared for gardens of the park) defecating on himself. If you choose to target our pets first, then I must seriously question the priorities of our city.

In addition, I understand that the DEIS proposed that racial minorities do NOT come to the GGNRA because of off-leash dogs. As a Chinese-American woman, I can honestly say that this is not true. Each morning, I walk through the park and the dog owners are seniors, they are minorities, so not only is this proposition a stretch, it's absurd. Such, below is a statement that I fully endorse.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely,

Audrey Liu San Francisco, CA 94114

Correspondence ID: 3845 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 29, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the

community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.
- ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- ? Exclude speculative, exaggerated, biased, or misleading statements and studies.
- ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- ? Enable professional dog walking and align any professional dog walking rules with county or city regulations.
- ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

I enjoy trips to Fort Funston with my dog and my parents and their dogs. Depending on the weather and energy levels, we've been visiting the park as much as two to five times a week for over eleven years.

Fort Funston is an extremely important place for my family. I use a wheelchair and have a service dog. Fort Funston is one of the few places with a significant distance of accessible paths and an off-leash area; it is one of the few areas I let my dog off-leash because I am able to travel parallel to him along the paths as he romps. With the proposed changes to off-leash areas at Fort Funston, I will only be able to travel along the perimeter of the area where my dog plays, which will restrict our interaction and enjoyment of the park.

From a social standpoint, we have made lasting friendships with people with different backgrounds that we would not otherwise interact with, were it not for our common bond as dog owners.

As frequent visitors, we can say that it is exceedingly rare to see problems between dogs or with dogs and people. We often see visitors without dogs and they are eager to interact with the dogs. I met one visitor that was going through treatment for breast cancer. She had come specifically to sit in the park and watch and pet the dogs and experience their energy. She's not alone among visitors I've met that enjoy the dog therapy that can be had at the

parks.

Again, I oppose the GGNRA's draft management plan. It fails to recognize the value - to people and dogs - that these parks provide under current policies.

Sincerely, Cecelia Perkins Burlingame, CA 94010

Correspondence ID: 3846 **Project:** 11759 **Document:** 38106
Received: May,29,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 29, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to

other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

I disagree strongly with the proposed GGNRA draft management plan for many personal reasons. As a city dweller I know I can enjoy a happy, healthy walk at Fort Funston because the dog owners are very conscientious in keeping their dogs under control and keeping the Fort paths very clean for everyone. With the dog walkers around I feel safe to walk and enjoy the beauty of Fort Funston because I am in the company of kind, clean, community concerned people. Please understand the reason for these GGNRA parks are for the enjoyment of the local people that use them everyday, not just for occasional visitors. I have been a member of the GGNRA, the Audubon Society and California Native Plant Society and understand the importance of our native environments. The GGNRA's plan does not seem to understand the environments of these local urban parks at all.

Sincerely,

Jacqueline Perkins Daly City,CA 94015

Correspondence ID: 3847 **Project:** 11759 **Document:** 38106
Received: May,29,2011 23:39:07
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean,

Please do not restrict our off-leash dog walking options further. I am an environmentally conscious citizen and love love love living in the Bay Area. It is truly one of the most beautiful places in the world. That being said, I have a dog who deserves the opportunity to, well, be a dog. He is a being of this earth as well, and should have the opportunity to run, sniff, feel the wind in his hair, explore. As a city dweller, we do not have a yard, and I already feel badly for him as a domesticated dog in a small apartment with an adventurer's spirit. Please don't break the spirits of dogs all around the Bay Area.

Thanks for you consideration.

Kelly Dorrance

Correspondence ID: 3848 **Project:** 11759 **Document:** 38106

Received: May,29,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: The

day Cleo, our 14 year old dog, came to live with us at 8 weeks old, our motto was, "A tired dog is a well-behaved dog". It's been in that spirit that we've raised both of our dogs, Cleo and Xena. I have been frequenting Crissy Field for recreation with my dogs off and on since 1997. They are now 14 and 13 years old. Because of our activities, and therefore their exercise and socialization, at Crissy Field, my dogs are model dog citizens: they have no aggression towards other dogs and they're wonderful with all humans, including children. The reason that so many dogs (over 100,000) can live so harmoniously with people in such a compact city is exactly BECAUSE of places like Crissy Field, Fort Funston, Ocean Beach and the many other places that fall within the GGNRA. It bears repeating that San Francisco is a city, an urban area, and not a pristine wilderness area and we have to balance all things to make it continue to work; up to this point it has worked extremely well. It would be a crime to take this recreation area away from the citizens of San Francisco and their dogs. Please, please, don't take this little slice of heaven away from my dogs. They love it...even at their advanced ages!

Sincerely, Deborah K. Brown San Francisco, CA 94114

Correspondence ID: 3849 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:02:03
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco CA 94123-0022

Re: Draft Dog Management Plan, Draft Environmental Impact Statement

Dear Superintendent Dean,

I'm entering my seventh-year as a resident of the Richmond district. When my husband and I moved here in 2004, we only signed a six-month lease because we weren't sure if we'd like city living, now we're raising a family here and hoping our grandkids are born here! One of the major contributing factors to our happiness in San Francisco is the fantastic walking available in the GGNRA. Almost daily we take our toddler and our dog on a walk in the GGNRA, and we love the off-leash exercise opportunities for our dog, especially at Crissy Field and Lands End.

We make every effort to be extremely conscientious dog guardians. Our 12-year-old Beagle/Corgi/Something mix is a very well-behaved, certified therapy dog who is also a Canine Good Citizen. We bring a bag, a spare, and one to share on every walk, and we volunteer to help clean up our local park (Mountain Lake Park). I've considered moving out of the city where it's

(at least strongly rumored) to be cheaper and easier to raise a family, but having the dog-friendly urban oasis of the GGNRA as a backyard continues to be one of the biggest perks for staying in the city. If the proposed new rules go through, it would have a big and negative impact on our daily life.

There are a few main points I want to discuss:

First, as I've followed this discussion over the years, it seems that there is a general perception-especially among the NPS administration-that dog-owners and environmentalists are at odds. In fact, that just has not been my experience at all. San Francisco is one of the most progressive cities in the country on environmental issues, and every dog owner I've ever met also cares deeply about the environment-after all, dogs need to walk, so we get out in nature often! Personally, I strongly support environmental organizations with my money, time, and votes.

I can only recall one of two instances in almost seven years of daily GGNRA use of seeing a dog owner act irresponsibly around sensitive areas-San Francisco residents as a whole are a responsible lot, but dog owners seem to take their guardianship seriously. The DEIS is short of specific examples (but full of generalizations and assumptions), but definitely lumps all dog owners into one category and tries to punish the entirety for the transgressions of a few. Especially when I see things like the "compliance-based management strategy" as part of the DEIS, which seems to assume that dog owners are irresponsible and makes no allowance for collaborative community-based strategies and cooperation-building, it's clear that the stance from the beginning of this process towards dog owners has been adversarial. I wonder what would happen if the process could be restarted with true partnerships with organizations like the SPCA and Eco-Dog?

Second, I can't emphasize enough how much this beautiful recreation area means for me in the middle of an urban environment. I absolutely would move if I didn't have this available for my daughter, and being able to take both my dog and my daughter on a walk is a crucial part of the experience both from a logistics/scheduling standpoint and a life-enjoyment factor. From what I understand, this area was originally developed for recreation-and it seems clear from the dog ownership numbers in this city that people in this town really enjoy their canine companions. As it stands, only a small fraction of the GGNRA lands are open for off-leash recreation, and this new plan is vastly inadequate for the needs and clear desires of San Francisco residents. (And this extends beyond just dog owners; I have two good friends in the Marina district who can't own dogs in their apartments who go to Crissy Field regularly to get their dog fix.)

Part of the problem seems to be that the NPS administration wants to run the GGNRA like it does other National Parks. But the GGNRA just isn't like

any other National Park that I've been to (and I've been to several dozen). Perhaps it was a mistake to try to even have the NPS manage the GGNRA- maybe the cultural DNA of the NPS and trying to make everything run exactly the same wasn't a good idea.

Thirdly, as someone who has invested a lot of time, energy, and money into training our dog, I know that most dogs simply cannot be adequately exercised on-leash. And especially since I now always have a two-year-old with me when we're out and about, I could never walk far enough of fast enough to give my dog enough exercise. Dogs who learn to walk responsibly off-leash are by far the safest dogs, and dogs on-leash are far more likely to cause problems as leashes define boundaries and can promote territorialism. I feel far safer for myself and my toddler when I'm in an off-leash dog area than an on-leash area.

And while we're talking safety, having my dog with me is part of my own personal safety in the GGNRA. Part of its charm is its vastness, but I wouldn't feel safe venturing out alone, especially in the early morning or evening hours without my dog.

Fourthly, I have read all of the available information over the years of this discussion, and I just cannot find evidence that the bulk of the claims made in the DEIS are scientifically supported. I also haven't seen any sincere good will efforts made by the NPS to address the few problem areas. For example, when I was a new city resident walking my dog at Ocean Beach, I had no idea where the off-leash versus on-leash dog portions of the beach were. In fact, when I went back to try to find exactly where the demarcations lines were as part of an article I wrote about Bay Area dog destinations, I finally found the correct information through the Ocean Beach dog group- the official NPS websites were difficult to navigate and on-site signage was very poor. If such drastic measures need to be taken, then we need site-specific evidence that dogs are actually the problem (from what I've observed, hordes of people watching fireworks do a lot more damage.)

I do realize that there may be some changes needed, but by and large dogs, people, children, and wildlife have co-existed quite nicely for three decades. Maybe a few tweaks are in order (I would support dog-walker licenses and limiting the number of dogs per adult, clearer signage, and other common sense measures that could be worked out in a community-partnership fashion), but the drastic and draconian measures that the DEIS proposes are not justified and will cause much more harm than good for dogs and people.

I fully support Alternative A, the No Action alternative of the DEIS for all locations, but especially for Lands End and Crissy Field.

Thank you for your time and consideration. I am happy to be an informed and responsible participant of keeping the GGNRA a fantastic urban destination for natural recreation, but I am firmly convinced that this version of the DEIS is deeply flawed.

Sincerely,

Daneen Akers San Francisco, CA 94118

Correspondence ID: 3850 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:02:32

Correspondence Type: Web Form

Correspondence: I am a 15 year resident of San Francisco, father of 3 little kids (age 6,3,and 3), and a dog owner. I work in Palo Alto and spend 2 hours commuting every weekday. I regularly tell people that the primary reasons we haven't moved south despite the painful commute and the insanity of navigating the city's educational system are the beaches and parks. I usually go on to explain that our weekends revolve around getting up early and going with our dog and kids to the beach, either Crissy Field, Baker Beach, Ocean Beach, or Fort Funston. Our kids usually request/demand that we go to the "beach with the river" (meaning East beach Crissy Field), and once in the car our dog begins chortling with anticipation of swimming after tennis balls. It is the way we experience this unique city, and it is something we couldn't do if we lived elewhere. Simply put if we had to keep our dog on a leash during these trips we wouldn't go and we would probably move out of San Francisco. I know this sounds melodramatic but its not an exxaggeration.

With that as the backdrop, let me commend the drafters of the dog management plan. For the most part I think you have done a great job finding the rational and razor thin middle ground between the envirnomentalist, the dog haters, those that are simply annoyed by dogs or nervous around dogs, and the dog fanatics. However, I would suggest one refinement. You should alter your East Beach and Baker Beach proposals to be a time based system. Specifically I think you should allow off leash dogs prior to 10 am and perhaps after 7 pm on weekends and holidays, and prior to 3 pm on weekdays. If you have spent any time at these locations during these time slots, as you obviously have, I assume you have observed that there are very few visitors who aren't accompanied by dogs. The beach going families, tourists, wind surfers, and kite boarders don't arrive until later. There are also no breeding snowy plovers or other sensitive environmental concerns that I am aware of.

If I was going to make a second suggestion it would be increasing the

severity of the disincentives to be and irresponsible dog owner. For example I would be very supportive of a \$250 fine for any dog chaperone caught not having poop bags in their possession and a similar fine for anyone who is clearly not making an effort to keep their dog out of sensitive environmental areas (e.g. behind the fenced/roped off areas at Crissy Field and Baker Beach.)

Good luck.

Correspondence ID: 3851 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I am a 14 year resident of San Francisco and a dog owner for 11 of those years. I own a home in Noe Valley. Either I, or the dog walkers I employ, use the parks of the GGNRA (Fort Funston, Crissy Field, Presidio, Marin Headlands) on a daily basis. I am a member of the Sierra Club and have supported many environmental and wildlife initiatives. Protecting the Earth and her resources for future enjoyment and sustainability is a priority.

I do not agree with the GGNR's current preferred alternative as it greatly restricts and eliminates off leash dog walking in many areas within the GGNRA. I would not enjoy or use these lands if they did not permit off-leash access. It would be a shame to see these lands go unused and un-enjoyed. Since I have owned a dog, I have become a frequent user of these recreation areas and it has improved my quality of life and health dramatically. I appreciate and am grateful for the access I have had for the years I have lived in the Bay Area and I want it to continue as it is.

I follow the posted rules and do not enter protected areas that are clearly marked or fenced. My dogs have always been well trained and under voice control. On crowded warm weekend days (the few we have), I voluntarily leash my dogs, even. I do my part to clean up the parks, not only for myself but for others who may have inadvertently left refuse behind. I feel that I would be penalized instead of rewarded for how I have supported these parks. Please consider alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe there exists an approach that balances recreational use (including dog-walking access) with preservation. Please consider education, increased and improved signage, and fencing or other barriers instead of completely denying access. This would be a detriment to human enjoyment of these lands, as well. It is imperative that the DEIS include

such alternatives as a reasonable option.

After a very thoughtful review, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration. Sincerely, Pamela A. Petriello San Francisco, CA 94131

Correspondence ID: 3852 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:15:57
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean,

I wish to express my support for the National Park Service's goal of finally creating a Dog Management Plan (DMP) for Golden Gate National Recreation Area (GGNRA), but I am extremely disappointed by how much of the park would remain open to pets, and I am very opposed to the proposals to allow off-leash pets in any area of the park. National Park Service (NPS) areas are not the appropriate location for dogs, let alone for dogs to be allowed off-leash. The NPS's mission is to protect the natural and cultural resources; not to allow recreation to undermine it.

If dogs are to be allowed in certain areas, they should be restrained on leashes at all times, as they are required to be at other NPS sites. And those areas in which on-leash dogs are permitted should not be near to or within wildlife habitat. Recognizing that the NPS will inevitably cave to those who believe that they have a god-given right to take their pets with them wherever they go and let their dogs run amuck, the proposal, at a minimum, should be modified so that it:

* requires that all off-leash areas be enclosed to protect other park users, wildlife, and other dogs. Park visitors should be given a choice about whether they will interact with off-leash dogs.

* limits off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

* acknowledges the importance of the GGNRA as a migratory bird corridor in the Pacific Flyway.

* carefully analyzes past, present and future impacts of dogs to wildlife and

habitat in the GGNRA.

- * establishes measures to protect and preserve wildlife and habitat for future generations to enjoy. In particular, the NPS must maximize protections for special-status species such as the Bank Swallow, Western Snowy Plover, Northern Spotted Owl, and Brown Pelican.

- * provides more trails that are free of dogs.

- * limits dog walkers in the park to three dogs. It is not appropriate for the NPS to create commercial permits for professional dog walkers. Also, it is unlikely that most visitors with dogs will be able to keep control of more than 3 dogs at one time.

- * completely abandons all proposals for "regulated off-leash areas." A few pet owners may be able to keep their pets under "voice control," but in my experience, the vast majority of pet owners who let their dogs off-leash in "voice control required" areas have no ability to recall or control their pets with just their voice. Far too many times I've encountered pets well out of ear-shot of their owners, or pets that just ignore their owners. When asked to better control their dogs and keep them from chasing after shorebirds, people, or other dogs, these owners invariably insist that their dog is under control. And

- * implements compliance-based management and include specific details on how existing and new dog regulations within the GGNRA will be enforced. Leash requirements must be strictly enforced throughout the life of the policy. Otherwise proposed on-leash areas will become off-leash areas, as has already happened under the old rules. Any Dog Management Plan or EIS Alternative must also include funding for enforcement.

The goal of achieving 75% compliance with the leash and voice control requirements is far too low. The NPS should not be creating a system that expects and tolerates failure by 25% of the dog walkers. The NPS should adopt a goal of at a minimum 95% compliance with leash and voice control requirements. And if pet owners are unwilling to comply with park regulations, then the park should be closed to walking pets and pet owners who violate the regulations should be cited for doing so.

While I recognized that the NPS has long been involved in trying to find the right balance for protecting the natural values of the GGNRA and meeting the demands of a variety of park users, I strongly believe that pets should not be permitted in any NPS area. NPS areas--particularly wild areas--are not the appropriate location for dogs; they should be reserved for native wildlife and for human visitors who are willing to take only photos and leave only footprints, hopefully leaving the park in better condition than

when they arrived. There are so many other public lands on which pets are permitted throughout the nation--and the San Francisco area already has a very high concentration of other public parks in which pets are permitted, both on- and off-leash--that there is no need to allow pets in NPS sites--areas in which we as a nation are, if the rhetoric is to be believed, trying to provide some of the greatest protections for wildlife against human-related disturbance. The NPS set a horrible precedent when it didn't restrict pets when the GGNRA was created, and this DMP just perpetuates and exacerbates that terrible decision.

GGNRA is the world's largest urban park and provides critical habitat for some of the state's most rare and threatened species, including 11 federally listed endangered wildlife species and 9 federally listed plant species. I am concerned that the DMP could lead to changes that would continue putting sensitive park resources and public safety in jeopardy. Numerous academic and government studies identify off-leash pets as threats to visitor safety, wildlife, and the integrity of natural and cultural resources. For example, a study by the American Humane Association documents injuries to humans, wildlife, and pets as a result of unleashed pets and recommends that pets be leashed in public areas set aside for natural resource protection purposes. GGNRA records indicate numerous incidents of dog bites, threats of dogs to park visitors, and instances where park rangers were forced to risk their own safety to rescue uncontrolled pets and pet owners trapped on cliffs or in the ocean. Over the years, the Golden Gate Audubon Society has documented that approximately 2/3 of dog walkers in the Crissy Field Wildlife Protection Area (WPA) ignore the leash requirements and let their dogs roam off-leash even while the threatened Snowy Plover is present. The rates of non-compliance are even higher on Ocean Beach and at Ft. Funston.

I strongly discourage GGNRA from implementing any seasonal closures to protect nesting wildlife; to adequately protect wildlife, current and potential nesting areas should be off-limits to dogs year-round. Seasonal closures are largely ineffective, even with the best of signage and education campaigns. By permitting off-leash dogs in, as an example, snowy plover habitat during any portion of the year, the park will reduce compliance with regulations when the plover is present, as many people will not realize that the closure is seasonal. I frequently visit the beaches of Point Reyes National Seashore where there are seasonal closures for beaches upon which snowy plovers nest and elephant seals haul-out. I have lost track of the number of times I have encountered people with dogs--usually with the dog off-leash--in areas closed to dogs, and when I inform the owner that pets are not permitted there, the response is often to the effect of "but the beach was open to dogs a few months ago." It doesn't make sense to open an area of the park for just a couple months each year to allow a small segment of the population to conduct an activity which has proven to be disruptive (and even deadly) to

the wildlife the park is supposed to protect.

The DMP is also inadequate for protecting snowy plover habitat because it does not include the entire portion of Crissy Field and Ocean Beach. It draws imaginary boundaries that do not comport with typical visitor's understanding of GGNRA, and the plovers are not, to the best of my knowledge, able to discern where these boundaries are either. A typical visitor with a dog will not always know if he or she is entering an area where pets are restricted, especially if the regulatory signs are vandalized or torn down by individuals who disagree with the rules, as too frequently occurs. This, again, will invite violations of pet regulations as people claim ignorance or confusion over the exact boundary. A closure prohibiting pets-- on- or off-leash--should apply to all of Ocean Beach and Crissy Field.

The DMP would also preclude the possibility of the snowy plover or other shore birds from ever adopting many coastal areas of GGNRA as nesting areas. According to the background information printed in the Federal Register during a previous comment period pertaining to dogs on Ocean Beach and Crissy Field, "snowy plovers do not nest in the park; they overwinter from approximately July through April. During the overwintering period, Snowy Plovers rest and feed to gather reserves necessary to successfully breed at other more suitable nesting locations up and down the Pacific coast." Given that snowy plovers nest on the beaches of Point Reyes, I would assume that snowy plovers used to nest on the beaches of the San Francisco peninsula, beaches which are now part of GGNRA. Aside from disturbance by dogs and humans, are there any other factors that prevent Crissy Field, Ocean Beach, and other park coastal areas from being suitable nesting locations for snowy plovers and other shorebirds? If not, then the presence of dogs and humans in these areas during the nesting season is likely the reason why the snowy plover has to migrate to other locations. And allowing pets in these areas when snowy plovers would otherwise be nesting there will assuredly prevent the plovers from ever selecting Crissy Field and Ocean Beach as a nesting site. And given how few suitable nesting sites are left for the snowy plover, it is incumbent upon the National Park Service?which is mandated to protect the wildlife unimpaired?to do everything it can to preserve whatever habitat there is for the plover to thrive. The National Park Service should therefore restrict dogs and other pets from potential nesting areas throughout the year.

And it's not just snowy plovers that are negatively impacted by dogs in GGNRA. Too many times I have witnessed off-leash dogs in NPS areas chasing after and harassing birds and other wildlife. A friend has related to me how, on a weekly basis, she witnesses a professional dog walker release up to 6 dogs to run and chase each other and wildlife in Oakwood Valley, trampling and tearing up the host plant to the endangered Mission Blue Butterfly. I've heard other friends describe witnessing off-leash dogs in

national parks attacking or harassing pinnipeds and chasing after shorebirds, including the threatened snowy plover. These reports lend more validation to the argument that dogs-especially off-leash dogs-have no place in national parks.

But it is not just park wildlife that is negatively impacted by pets. On several occasions as I have hiked in national parks or strolled along a park beach (more often than not where pets are prohibited, but also frequently in areas where they are at least required to be on leash), I've encountered off-leash dogs running out-of-sight of and well ahead of their owners, and frequently out of earshot. A number of these dogs have charged me, and many have made contact. So far, I have been fortunate and have not been bitten or injured. The same cannot be said for many of my friends or their pets which were on-leash. When I politely try to inform the dog's owner of the park regulations pertaining to pets, the owner more often than not interrupts me and generally is downright rude, making comments such as "Mind your own business" or "Go home." My friends relate similar stories. Granted, many pet owners are responsible and do not take their dogs where they do not belong, but it seems as though many of the pet owners who take their dogs to national parks are not amongst the ranks of the responsible or courteous. I grew up with dogs and am therefore familiar with them and know how to react to the dogs charging at me, but it still is not a comfortable situation to be in-not knowing whether the dog will actually attack or not. And for those who are unfamiliar with or afraid of dogs, such encounters are terrifying.

As a result of these encounters, I endeavor to hike on trails and visit areas where pets are prohibited. The DMP would provide those of us who share such sentiments with few trails within GGNRA where we would not likely encounter dogs. It is disturbing how little of our nation--let alone the San Francisco Bay area--is left for those of us who wish to visit natural areas without encountering dogs-or cell phones, guns, horses, bicycles, ATVs, aircraft, etc. We as a nation are quickly destroying wildlife habitat and the wilderness in the pursuit of doing whatever we feel like doing with no regard for how it affects others.

GGNRA is also perpetuating a horrific precedent that will reverberate throughout the National Park system by having regulations pertaining to pets at odds with those at nearly every other NPS site. I already encounter many pet owners walking their dogs on the trails of Point Reyes National Seashore who express surprise that pets aren't permitted on these trails given that they frequently walk their dogs in GGNRA...and aren't both Point Reyes and GGNRA National Park Service sites...and if they can walk their dogs on GGNRA trails, why not within Point Reyes?

By establishing some areas where pets are prohibited, others where they are permitted on-leash, and then others where they are permitted off-leash,

GGNRA and the NPS just seems to be doing its best to confuse the public and to give pet owners the excuse of ignorance when they are caught with their dogs off-leash in a closed area. The NPS should have uniform regulations pertaining to pets throughout the system. And in order to protect the wildlife, their habitats, as well as other visitors, the only sensible conclusion is to prohibit pets from all NPS sites. By maintaining one park-system-wide pet policy and instituting a nationwide education effort to inform pet owners about the policy, pet owners won't have an excuse for not knowing that pets are either prohibited from national parks or are at the very least required to be on-leash in a handful of specific areas at NPS sites.

And prohibiting pets at NPS sites would reduce another problem I frequently witness: dogs left in vehicles--often very hot vehicles. Another excuse I have frequently heard from those walking their dogs in areas where pets are prohibited is that they didn't want to leave their pet in the vehicle. This is understandable. I am outraged when I see a pet locked inside sun-heated vehicles while their owners are off hiking. I would assume that many dog owners, having become accustomed to hiking in GGNRA or other non-NPS public lands with their dogs, automatically take their dogs with them whenever they go hiking thinking that they will be able to go for a hike with their dog like they do at GGNRA. But then they arrive at parks like Point Reyes National Seashore and realize that dogs are not permitted on the trails. They have a choice to make: leave the dog in the vehicle, take the dog on the trails despite the regulations, or to go home or elsewhere where dogs are permitted. Far too many people choose one of the first two options. If the dog is left in the vehicle, it frequently sets to barking non-stop until the owner returns, sometimes several hours later. The rate at which pets would be left in vehicles or taken on trails because the owner didn't want to leave the dog in the vehicle would likely be greatly reduced if pets were prohibited in parks. Pet owners would hopefully have heard through a public information campaign that pets aren't permitted at NPS sites and will leave the pet at home if the owner wants to visit a NPS site.

And then there are all the dog owners who refuse to clean up after their pets, and all of the resultant disease and pollution issues, which are well documented and upon which I won't elaborate in this comment. But dog feces which are not cleaned up is just one more reason to prohibit dogs from NPS sites.

Some may argue that a prohibition against pets in NPS sites is excessive and unnecessary; that proper signage of where pets are and are not permitted would be sufficient. Those who make this argument must either willfully ignore or be blissfully unaware that a large number of pet owners are, apparently, oblivious to signage relating to pets or are somehow incomprehensibly ignorant as to what the signage means. Pet owners can pass by multiple signs indicating that pets are prohibited or are required to

remain leashed, and when they are informed that they passed by such signs, they declare that they never saw the signs. Or, if they did see the signs, they claim that they thought that the signs meant something else. I've had a staggering number of individuals who must have thought that I was an idiot or extremely gullible tell me that they understood the signs with the red slash through the silhouette of a person with a dog on leash to mean that dogs were permitted to be off-leash.

Some who want to maintain the destructive status quo may argue that they have long been able to walk their dogs in certain areas, even before GGNRA was established, and that that the NPS has no right restricting their ability to continue walking their dogs there. Following this rationale, upon those lands that the NPS has acquired which have been previously logged, mined, or hunted, logging, mining, and hunting should be allowed to continue largely unabated. Except for a few exceptions, these activities are not permitted. When National Park Service sites are established, we--as a nation through our elected representatives--are agreeing that these areas are special and deserve the highest level of habitat or cultural resource protection and that any activities that might have previously occurred there will be ended if such activities do not leave the "scenery and the natural and historic objects and the wildlife...unimpaired for the enjoyment of future generations." When National Parks Service sites are created, activities that impair park resources are, more often than not, ended. So, logging was prohibited within Sequoia National Park, Olympic National Park, Redwoods National and State Parks, and a number of other sites, when these areas were designated as National Parks, even though people had been logging in those areas for, at times, generations. Similarly, mining, hunting, and other extractive activities have been prohibited at various sites when they are included within National Parks.

Granted, dog walking is not an extractive activity; it's recreational (although far too many birds and other wildlife have been destroyed by dogs in parks). And while dog walking may not impair park resources to as great a degree as logging, mining, and hunting, no one can truthfully claim that there is no impairment caused by dogs to park resources. With regard to other recreational activities, when the use of Personal Water Craft (PWC) was deemed to pollute park waters, disrupt the natural quiet, and disturb park wildlife and visitors, PWCs were banned from many NPS sites where they had previously been permitted. There are many other recreational activities which the NPS has curtailed or prohibited because of the activities' negative impacts to park resources. But for some bizarre twist of logic, the NPS at GGNRA has created a large exemption for dog owners, which continues to result in the impairment of park resources. Why? It's not as if the NPS will be prohibiting the pet owners from walking certain trails or visiting favorite beaches. Pet owners would be more than welcome to visit these sites, so long as they do not bring their dog along for the hike. It isn't

in any sense different from PWC enthusiasts wishing to go to, say, Tomales Bay within Point Reyes National Seashore. They are welcome to visit and kayak and participate in other low-impact activities on Tomales Bay, but they may not use their PWCs. And loggers, miners, and hunters are all free to visit National Parks, but they are prohibited from logging, mining, and/or hunting during their visit. If a pet owner wanted to go for a walk with a dog, the pet owner would have to find a different location to do so--similar to how a hunter has to find other locations than national parks at which to hunt.

Regardless, I am unaware of any other regulated recreational activity that the NPS allows to continue within parks with such high levels of non-compliance. Maybe I'm wrong, but it seems as though the NPS would prohibit any other activity with similarly large numbers of participants refusing to adhere to pertinent regulations. What is so different about visiting parks with dogs that results in this special treatment?

National Parks and National Recreation Areas have been created to conserve the resources in those areas in an unimpaired state so that current and future generations may experience and enjoy those resources. The NPS, therefore, cannot legally permit activities that would harm or impair those resources, lest the resources be lost to future generations, regardless of how much enjoyment current visitors may obtain from participating in those activities. Nor should the National Park Service allow activities by some that negatively impact the enjoyment of the park by others. Yet the NPS and our government seems to quickly cave-in to every user group that claims their rights are being infringed upon because the NPS prohibits a particular activity that is detrimental to the wildlife and habitats which the NPS is supposed to protect. Why can't the NPS adhere to its mission?

In light of NPS officials inevitably bowing to political pressure from pet owners and considering that much of GGNRA is already urban and heavily developed, GGNRA would be one NPS site where I can understand bending the rules by allowing a few areas to be opened for walking pets on leash, so long as those areas are adjacent to San Francisco residential neighborhoods that have no other parks where pets are permitted, and so long as those areas do not include wildlife habitat or sites on the Marin Headlands. And under no circumstances should pets be allowed off-leash outside of a handful of areas.

There is little debate that off-leash dogs both harm the natural resources--primarily by harassing and scaring off the wildlife--and that off-leash dogs negatively impact the enjoyment of other park visitors who don't appreciate or might be frightened by large dogs bounding toward them, or by scaring off the wildlife other visitors may be observing. For these reasons--along with promoting humane treatment of pets and providing uniformity between national park pet policies--I encourage the NPS to prohibit pets from

GGNRA--or at a minimum to prohibit them from all but a few locations and to vigorously enforce the Park Service leash policy where pets will be permitted. Thank you for considering my comments.

Sincerely, Christopher Lish

Correspondence ID: 3853 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:40:50

Correspondence Type: Web Form

Correspondence: I am writing to respond to the proposed plans to the Golden Gate National Recreation Areas. I strongly object to changes in the laws and rules regarding dogs. The current restrictions are more than adequate to protect wildlife, the land, and to accommodate park users who do not like dogs. Walking dogs outdoors should be encouraged, and not discouraged. Restricting access to dogs will create overcrowding in state, city and county parks. Further, the wildlife in the lands in the GGNRA are thriving despite the fact that the lands are situated in an urban area.

I live in Pacifica, CA and I am particularly concerned about the restrictions proposed on the Baquiano trail, in the San Pedro Point conservancy area, in the Sweeney Ridge area and in the Milagra area. These are beautiful areas that are used primarily by people in the community and many have dogs. The current leash laws are all that is necessary to protect the environment. The trails are in coastal prairie lands and dogs, even if unleashed, would not be tempted to leave the trail because there is a proficiency of prickly low-growing shrub that prohibits free movement/exercise. Owners are not tempted to let animals roam because there is a lot of poison oak and also ticks.

The lands surrounding the GGNRA lands are already quite protected and do not allow dogs at all. The San Mateo County Park service, which owns the San Pedro Valley Park, that adjoins Sweeney Ridge, does not allow dogs at all. The Crystal Springs reservoir lands to the south and east, are closed to both people and dogs and kept pristine to protect the water supply. Additionally, there is not a problem with dog waste in the Pacifica GGNRA lands. The community is very ecology-minded and pollution is minimal. Occasionally, there is waste that has not been picked up, but it is generally limited to the trailheads because of the territorial nature of dogs. Further, coyotes are common in this area and dog feces are not meaningfully different from coyote feces, which are often found on the trails. People who complain about dog feces are likely mistaken about how much dog feces is on the trails because coyotes, bobcats, cougars and raccoons are flourishing in this area and the feces from these animals are easily mistaken for dog

feces by people who do not own dogs.

It is extremely poor policy to be pursuing plans that discourage exercise. Obesity has become a real concern in this country which has in turn adversely affected the rates of diabetes, heart disease and stroke. The government should be encouraging exercise and recent studies have shown that exercising with dogs is one of the best ways to keep up an exercise routine. (See: <http://well.blogs.nytimes.com/2011/03/14/forget-the-treadmill-get-a-dog>) A study in the February 2006 American Journal of Preventive Medicine found that dog owners in Canada walk almost twice as much as those who do not own a dog. Regular walking is a good way to improve health. With ever-spiraling healthcare and Medicare costs, good habits should be encouraged.

Dogs are allowed in a very small proportion of GGNRA lands and yet that access is very important because without it, families with dogs will have to use other facilities which, in this densely populated area will put too much pressure on city and county parks. While I agree that having pristine land set aside for wildlife is generally a good idea, creating a very large terrarium in the second largest metropolitan area in the most populous state is ridiculous. People need to be able to use the land and not merely appreciate it as an abstract concept. San Francisco has more dogs than children. There are an estimated 120,000 dogs in San Francisco, according to the city's Animal Care and Control department. There are anywhere from 108,000 to 113,000 children, according to U.S. census figures from 2000 and 2005. (SFgate, 6/17/07.) Banning dogs ignores the reality that dogs are part of the fabric of the city.

As public funding has been cut over the past years, many parks do not have adequate policing/security. As a woman, my dogs are important to me because they offer some protection from crime and from mountain lions. Some states are pressuring the parks to allow guns in the parks -- if state laws allow. Certainly dogs are a much safer and more socially acceptable deterrent to crime and animal attack than guns. Also, I do feel that I find it pretty arbitrary to pick on dogs. Mountain bikes have been growing in popularity in the parks over the past decade. I use the trails on a daily basis and have seen countless smashed snakes, lizards and newts with bike tire tread marks imprinted in the bodies on the trails. As for dogs on the beach -- families with children and teenagers leave a lot more trash on the beach than do dogs. Go to the beach at the end of any warm day and you'll find a lot more juice boxes, chip bags and beer bottles than you will dog feces. Do you plan on banning mountain bikes and young people from the parks next?

The GGNRA lands are thriving despite being situated in such a populous area. There are no longer dirt bikes criss-crossing Pacifica every weekend. The endangered populations of birds have beaches, such as the one at Mori

Point, to use without any human or canine interventions. While I appreciate the concerns of bird lovers, and I consider myself among that group, I think that the needs of people in an urban area must be addressed as well. Frankly, the idea that domestic dogs pose a threat to our bird populations seems pretty absurd. Pollution, loss of habit, loss of prey species, global warming ? these are actual threats to our bird populations. Antagonizing a large, vocal group that loves to be out in nature is simply not good policy.

Sincerely,

Gerry Sutkowski Pacifica, CA

Correspondence ID: 3854 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean, Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

My name is Deryl Carboy. I live in Palm Desert, CA and visit with my son and his family in the Bay Area several times a year. I am 82. Without a doubt the highlight of our visits is our daily walk at Crissy Field with their family dog. The parking set up, the flat paths and easy access to the beach where the dog runs, swims and plays with other dogs make it a wonderful place for our family outings.

I have read several sections of the DEIS and note that it mentions that many seniors and disabled people do not visit the GGNRA because of off-leash dogs. I would like to refute this. First, with respect to Crissy Field, we visit because of the off-leash dogs. It brings us a great deal of joy to watch my son' golden retriever fetch, roll in the sand and swim. I have many family photos taken during these fun times. The reason we do not go to the other GGNRA areas is because they involve steps or are otherwise not set up to accommodate seniors. If these places could be modified to make them more accessible - and provided off leash dogs are allowed - we would go on outings to these places as well. I am simply unable to navigate the steps at Fort Funston or on the Coastal Trail where my son also takes his dog. We tried these locations however needed to return to Crissy Field. We occasionally go to Baker Beach as the parking area is close to the water where the dog plays.

I see from the maps in the DEIS that the GGNRA's current preferred alternative significantly restricts and eliminates off leash dog walking in

many areas within the GGNRA. The GGNRA is a national treasure and steps should be taken to EXPAND access for people with dogs, especially families and seniors. This might include better steps, paths, benches, hand rails and signage. When we are at Crissy Field I notice senior citizens and disabled people as well as parents with toddlers, sitting on the benches and the concrete wall near the east parking area watching the dogs play. Watching these playful creatures in a beautiful environment is a source of joy for all who visit. I simply cannot fathom why the GGNRA wants to take this away from the dog guardians and all of us who cannot or do not have dogs who love to watch them at play.

I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas for all citizens for generations to come. As such, it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on all GGNRA lands, current and new. I favor an approach that balances recreational use (most definitely including off leash dog-walking) with preservation. I think that an approach that incorporates education, improved signage, improved access for seniors and disabled and physical/vegetative barriers is a good place to start. Restricting dogs makes the GGNRA a place that actively discriminates and is void of the fun and joy that dogs and their families bring. It is only logical that the DEIS consider progressive and community friendly option.

The document discusses a "compliance-based" approach as it punishes park goers with dogs for the perceived transgressions of a few. What if a senior or disabled person or young woman with toddler is unable to walk to the areas that are set aside for dogs ? They would be put in the terrible position of having to break the proposed rules or go home without enjoying without enjoying the natural beauty of Crissy Field, without socializing with a diverse set of other visitors and without giving their dog a chance to run and play. This simply does not make any sense. It is a byzantine approach and is set up for failure. Can you really not think of forward thinking and inclusive ways to allow all people and their family members, dogs included, to enjoy the GGNRA.

The GGNRA seems to be taking a very distrusting and adversarial position vs. the dog guardians of San Francisco. My experience is that this rather large group of citizens (all my son's friends have dogs) highly value our natural resources, always clean up after their dogs, are polite around seniors and the disabled. I have seen the Crissy Field Dog Group cleaning up trash and other debris. My daughter in law goes out with a group at Fort Funston that does the same thing. Dogs and their guardians make us all better and happier and make the GGNRA a cleaner and safer place. My son and his family do not have a yard. The GGNRA is their yard and the place that they socialize with their friends. The DEIS does not take this into account. The fundamental purpose of creating the GGNRA was to provide open space for

recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. If the GGNRA preferred alternatives are put in place my recreation at Crissy Field and my family's recreation at Crissy Field and the other GGNRA locations will be severely impacted. This does not seem to be considered in any way.

After careful consideration and reviewing the maps, I support Alternative A (the "No Action alternative") for Crissy Field, Fort Funston and Baker Beach. This Alternative A might be modified to provide more benches, more ADA access points, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for considering my comments.

Sincerely, Deryl Carboy Palm Desert, CA 92211

Correspondence ID: 3855 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA's draft dog management plan. It is not based on facts and reaches conclusions that are not supported by either science or law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. The proposed plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: (1) Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. (2) Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. (3) Exclude speculative, exaggerated, biased, or misleading statements and studies. (4) Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). (5) Enable professional dog walking and align any professional dog walking

rules with county or city regulations. (6) Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Based on my personal experience, it does not seem that allowing dogs on GGNRA lands would cause any additional harm to the land than already caused by allowing adults and children. If there are issues concerning pickup and removal of dog waste, then that is an issue that can be addressed by perhaps citing and fining those who fail to do so. Otherwise, the dogs are being punished for something that is not their fault. Having off-leash dog areas is very important to the well-being of dogs, allowing them to really exercise and get all of their energy out. This, in turn, is a benefit to the larger community, which is not bothered by aggressive dogs.

Thank you for considering my comment.

Correspondence ID: 3856 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am 76 years old and health problems prevent me from going far. I can occasionally visit GGNRA.

There are parks to exercise dogs near my home and all over. Please limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats. GGNRA's purpose is to protect natural and cultural resources. Alternative D best accomplishes that.

Endangered species wildlife habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

Courses for runners and horses should be confined to the periphery of the park where they will not impact sensitive species.

Thanks, Art

Correspondence ID: 3857 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear NPS - Golden Gate NRA,

I appreciate the opportunity to provide input to this Draft Management Plan.

Although I appreciate the needs and desires of dog-owners, I think that NPS units should be more for wild plants and animals than for purely human-oriented (or dog-oriented) pleasure. It is with this in mind that I make these specific recommendations:

--Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

--Require all off-leash areas to be enclosed to protect park users, native plants and animals, and other dogs.

--Endangered or rare plants and animals habitat deserve a higher level of protection from human disturbance; the compliance rate should be 95%, not 75% as outlined.

--The park should better accommodate diverse park user groups, such as runners, families, and those with service animals, by offering more than one trail and more beach areas free from dog recreation.

--The park's mission is to protect the natural and cultural resources, not allow recreation to undermine, damage or destroy it. Alternative D best reflects the national park values.

Thank you.

Correspondence ID: 3858 **Project:** 11759 **Document:** 38106

Received: May,30,2011 01:01:29

Correspondence Type: Web Form

Correspondence: These comments are in regards to the proposed GGNRA rules for managing pets, including dogs, in the GGNRA.

Mori Point in Pacifica, CA: I support Map 17, the preferred alternative. I visit Mori Point most weekends. There are always many dogs off-leash. Some are under voice command, most are not. Most people who say they have voice command do not: the dogs do not listen to the owners and do not behave. Virtually all off leash dogs enter open space, running and disrupting wildlife, particularly birds.

Here's an image of a Great Blue Heron hunting on Mori Point:

http://www.pacificariptide.com/pacifica_riptide/2011/05/dejeuner-sur-lherbe-heron-hunts-mori-point.html It's safe to say that this bird would fly away if off-leash dogs ? or dogs on-leash in close proximity ? are present. If the usual dogs that some owners insist on letting run off-leash were present.

----- Regarding the GENERAL RECOMMENDATIONS submitted by the City of Pacifica: 1. The comments submitted by the City of Pacifica represent the views of a few individuals, not my views, and not the views of most Pacifica residents. The City of Pacifica comments also do not represent any general consensus.

In particular, a. The City of Pacifica comments: "Mori Point: We suggest that the trails designated on Map 17C as "Tmigtac" and "Pollywog" trails be modified to allow on-leash dog access. We believe the likelihood of either the red-legged frog or the San Francisco garter snake being harmed or negatively affected is extremely remote?."

----- On the contrary: trails designated on Map 17C as "Tmigtac" and "Pollywog" should not be modified to permit dog access ? on-leash or off-leash.

This area provides vital upland habitat to the rare and endangered San Francisco Garter Snake arguably the most beautiful serpent in North America and likely its most endangered.

Dogs are a clear and present danger to frogs, snakes and other wildlife. In addition, their urine and excrement are disturbing to local wildlife, especially coyotes and bobcats.

b. The City of Pacifica comments: "Future Considerations: ?We are concerned that a loss of on-leash dog access on lands within Pacifica might have unwanted economic consequences, as dog walkers will go elsewhere, effectively eliminating the possibility of patronizing Pacifica's restaurants, hotels, or other retail outlets?."

On the contrary: Pacifica still has a lot of unbroken ridge lines and beautiful open space -- with a lot of fascinating flora and fauna, including several rare and endangered species. It is a key reason people visit Pacifica: a fun hike, some good bird/butterfly watching, rare plants. etc.

Folks are able to come and walk their dogs ? leashed and legal - in many areas around town. - Visitors from nearby surrounding communities regularly walk their dogs in Pacifica, I see many off-leash any time I visit Mori Point. Since they live here, it's not as likely they will purchase restaurant meals etc. - Visitors from outside the area, on the other hand, usually will not have pets with them, but will be more likely to purchase meals, hotel rooms, etc.

Whether the businesses in Pacifica are competitive with the surrounding areas is independent of any dog walking opportunities.

The City of Pacifica has approved one dog park, which is still to be developed. Pacifica would behoove itself to be more livable by providing more than one dog park ? and not rely on destroying the wildlife habitat of our public lands to provide the service of a dog park.

----- Sweeny Ridge/Cattle Hill I support the preferred alternative.

----- Pedro Point, Pacifica CA I support the Preferred Alternative. This year, I saw more than one pet owner come to the beach, let the dog run and relieve itself. One person picked up after the dog, the other did not. This should not be permitted.

----- Chrissy Field I support Map 10-D. The main reason for this is that this area is important to the western Snowy Plover, which is listed as a threatened species under the federal Endangered Species Act.

----- Fort Funston I support the preferred alternative.

----- Milagra Ridge I support the preferred alternative.

----- Rodeo Beach I support the preferred alternative. I have often gone hiking and bird watching on this beach ? and would not like to see the many bird species threatened or unable to survive due to the presence of off-leash dogs.

----- Marin Headlands I support the preferred alternative. I have hiked this area many times, and seen bobcats and California Gnatcatchers, to name two special species.

All of my comments are based on the facts that:

? Dogs have our homes, our yards, our sidewalks, our streets, and many of our public spaces where they may run, play, eat and survive.

? Wildlife, on the other hand, has only that habitat which it has evolved to use. It cannot survive in our homes, in our yards, on our sidewalks and streets, and most of public open spaces. Running from dogs costs wild animals vital energy that they no longer have to get food, shelter. It adds stress that contributes to inability to survive and reproduce.

? People are increasing our numbers and the space we use so greatly that beaches and open spaces are encroached upon by us and our pets, to the extent that these spaces no longer provide safe shelter and food habitat for the wildlife that calls it home.

? I support education, ticketing and finally banning of dogs in areas where

pet owners ignore the rules.

Raised with cats and dogs, I'm looking forward to the day when I have the time to have my own big dog.

As stewards of our environment, we must respect the fact that wildlife will not survive without our active participation. Once wildlife is gone, it is gone forever. We cannot bring it back. I feel a responsibility to keep our beautiful wildlife habitat, plants and animals thriving ? for future generations to learn about, understand, and enjoy.

Thank you for the opportunity to share my views on this important issue.

Correspondence ID: 3859 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/29/11

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

My name is Shannon Mace. I live in the Mission, a block away from General Hospital. I use the GGNRA parks almost every weekend with my dog Mika. I will usually go to either Fort Funston or Crissy Fields at least once a week. I understand that people are saying that if you are pro dog, then you must be anti-environment, but that is simply not the case. I support the Sierra Club, and I have helped to implement a green culture of recycling at my work. I stop and pick up trash at your parks if I see it lying on the ground. The environment is important to me, and being in nature is important for both my dog and I.

I work at the Janet Pomeroy Center, a recreational for disabled individuals. I have gone on field trips with them to the GGNRA parks, and they enjoy both the parks, and meeting the people (and their dogs) who go to the parks.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. Furthermore, based on what I have observed while at the parks, the primary cause of environmental damage is not out of control dogs, but unsupervised

children, or other adults ignoring the posted signs. (It's not dogs that are carving designs in the sand dunes of Fort Funston.)

I believe that it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. (Maybe restricting children?) I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education / improved signage and physical / vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Shannon Mace San Francisco, CA, 94110

Correspondence ID: 3860 **Project:** 11759 **Document:** 38106
Received: May,30,2011 01:17:46
Correspondence Type: Web Form

Correspondence: It is time to restrict dogs in the national park lands - on and off leash. People should be able to enjoy most, if not all, of the waterfront beaches of San Francisco and in the Bay Area park lands without dogs.

Fort Funston should have very restricted dog use - most of the land at Fort Funston should be dog free for everyone to enjoy - how did it ever become a dog park?

Your plan for most of Ocean Beach with no dogs is great.

The plan for the beaches at Crissy Field works - with no dogs on East Beach, and a very separate area for dogs.

It's great that Muir Beach is planned as a no dog area.

Please do not give in to the very vocal minority group of dog owners, and if anything, reduce the number of areas for dog use in your plan. It's unbelievable how entitled and self centered they are.

Thank you for protecting our open spaces and making them available for all to enjoy - not just for people who love their dogs.

Correspondence ID: 3861 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean Frank Dean General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

My name is Jack Haemmerlin. I am 83 years old and, due to a war injury, I am disabled. I currently live in Palm Desert, CA however I lived in the Bay Area for many years and worked at the local TV stations. I have asked my partner, Deryl Carboy, to submit this letter for me as I am not good with the internet. I I visit with friends in the Bay Area several times a year. During each visit, rain or shine, we take my friend's dog to Crissy Field so she can run and play. I like to take pictures. This is possible because the beach is so close to the parking and rest facilities. We have tried to visit the Marin Headlands, Baker Beach and Fort Funston however because these locations are not friendly for access for disabled people we are restricted to visiting only Crissy Field. If these places were better set up to allow for access and we could allow the dog to run off leash (I cannot hang onto the dog while navigating the steps) we would visit these locations as well.

During a recent visit my friends explained to me about the proposed restrictions that the GGNRA would like to impose for on and off leash dog walking. I looked at some pages of the document, especially those pertaining to Crissy Field. Even though I don't have a dog I would like to comment as I feel very strongly about this. Visiting these areas is the highlight of my visits back to the Bay Area. I love to take pictures of the dogs. If the GGNRA preferred alternative is adopted I would not be able to visit Crissy Field with my friend's dog. I cannot imagine that you intended to discriminate against seniors and the disabled.

From a broader perspective, I see from the maps in the DEIS that the GGNRA's current preferred alternatives for most of the GGNRA areas significantly restricts and eliminates off leash dog walking. As a former resident of the Bay Area I know that the GGNRA is a national treasure and steps should be taken to EXPAND access for people with dogs, especially families, the disabled and seniors. This might include better steps, paths, benches, hand rails and signage. When we are at Crissy Field I notice many people who do not have dogs petting my friend's dog and watching other dogs play and swim. I know from first hand experience that seniors and disabled people are much happier when they have a dog and can get out and socialize and get exercise along with the dog.

I think that it is very important to preserve the GGNRA's natural resources and want to protect these important natural areas for all citizens for generations to come. As such, I suggest that the GGNRA consider reasonable and balanced alternatives for dog walking on all GGNRA lands, current and new. I favor an approach that balances recreational use (most definitely including off leash dog-walking) with preservation. I would like to see an approach that incorporates education, improved signage, improved access for seniors and disabled and natural barriers. Restricting dogs would make the GGNRA a place that actively discriminates (is that legal ?) and would be deprive families with dogs of the full enjoyment of this area (and all the health benefits that come from dog walking) and would deprive non-dog owning visitors of the fun of watching the dogs play on all areas of the grassy airfield and the beach.

The document proposes a "compliance-based" approach to punishes park goers with dogs for the perceived transgressions of a few. After all my years of observing human behavior, if you set up a rule that is unreasonable or simply does not make sense, people will break it. If seniors, or disabled or young mothers would like to exercise their dogs near the parking lot at the beach or the parking lot near the big green air field, they will. They will do this because reaching the designated areas may be physically difficult or impossible and because other park goers LIKE to see the dogs play and often engage with the dogs. I know I do and I see others doing this as well. The GGNRA seems to be taking a very unfriendly and adversarial position

vs. the dog guardians of San Francisco. This will only make Crissy Field and the other areas places of conflict, not peace and relaxation.

My experience is that this rather large group of citizens, my friends in San Francisco and the many friends in the Bay Area with dogs who I still speak with, highly value our natural resources, always clean up after their dogs, are polite around seniors and the disabled, or ARE senior and disabled and count on the GGNRA for their and their dogs' exercise and fresh air. I should add that the dog owners seem to be a very friendly and helpful group of people. They are always very considerate of the seniors and others using the beach and sidewalks. I am grateful they are there especially when the weather is not nice as I know if something happens to me or I need help they will always offer to assist me.

The GGNRA is a backyard to residents and visitors to the Bay Area. The DEIS does not take this into account. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. If the GGNRA preferred alternatives are put in place my recreation at Crissy Field and my friend's recreation at Crissy Field and the other GGNRA locations will be severely impacted. This does not seem to be considered in any way.

After careful review of the maps, I support Alternative A (the "No Action alternative") for Crissy Field, Fort Funston and Baker Beach. This Alternative A might be modified to provide more places for seniors and those who are disabled to sit such as benches .

I appreciate your reading my letter.

Sincerely, Jack Haemmerlin Palm Desert, CA 92211

Correspondence ID: 3862 **Project:** 11759 **Document:** 38106
Received: May,30,2011 01:51:42
Correspondence Type: Web Form
Correspondence: I am currently living in Seoul, Korea, but between 2001-2010 I lived in San Francisco, four of those years with my golden retriever mix, Henry. I am planning to return to San Francisco in the next few years, with Henry. I am the Director of Scientific Affairs at the Institut Pasteur Korea. I am a PhD scientist and very knowledgeable about human health, particularly chronic diseases such as obesity and cardiovascular disease.

I am very concerned that the regulations being proposed are too restrictive and are motivated by a desire to turn GGNRA into a wildlife preservation area, without consideration for the impact on human health and recreation. People living in the Bay Area tend to have a higher quality of life because of the access to the outdoor park system (of which the GGNRA is a key element) and their ability to stay fit.

Personally since I have moved to Seoul and can no longer walk my dog like I used to, I have gained 20 pounds and my health has declined dramatically as a result. I am very concerned that restricting GGNRA access to such a large number of Bay Area residents will cause a similar decline in their health. The GGNRA belongs to the Bay Area and access should not be limited so drastically in this way.

Concentration of all dogs and their owners in very small segments of the park will further create unpleasant and potentially dangerous situations due to overcrowding, and this will no doubt impact other dog-friendly parks that remain, as they will have to absorb the traffic of dog owners seeking places to walk their dogs and get the exercise they previously were able to have at GGNRA.

Instead, I suggest GGNRA maintain the same level of access to dogs and their owners, but more rigorously patrol off-limit areas and enforce policies on cleaning up after pets. It is true there are always the small percentage of inconsiderate dog owners who do not respect the rules, but punishing all of us who abide by the rules and are considerate is unfair, and will create a much poorer quality of life and health for a wide sector of the Bay Area population.

I urge you to reconsider the plan and continue allowing off-leash dogs in areas of GGNRA like Muir Beach, Crissy Field, Fort Funston, and Ocean Beach so the Bay Area residents with dogs can continue to enjoy these areas and continue the high quality of life and health that is the reason so many of us choose to live in the Bay Area.

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| Correspondence ID: | 3863 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 01:58:36 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | As a responsible pet owner and a home owner and resident of San Francisco, I walk my dogs daily in the parks and recreational areas in and in the vicinity of San Francisco. Areas where I frequent are Golden Gate Park, Fort Funston, Crissy Field, Baker, and Baker Beach. The area where I typically take my dogs for off-leash recreation is primarily Fort Funston. As | | |

I work during the week, my use of Fort Funston is primarily on the weekends. Due to the terrain, it is very rare to see picnic-ers at Fort Funston due to more challenging access to the beach areas. I would really appreciate if some compromise re: dog usage in GGNRA were implemented. For example, limiting the ratio of dogs under the supervision of humans, or allowing some areas to remain off leash such as Fort Funston, which is not a big draw for tourists.

Thank you for your consideration.

Correspondence ID: 3864 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Many 30, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.
- Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- Exclude speculative, exaggerated, biased, or misleading statements and studies.
- Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- Align commercial dog walking rules with county or city regulations.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when

you've been out at the GGNRA) Sincerely, Akiko Kariya

Correspondence ID: 3865 **Project:** 11759 **Document:** 38106
Received: May,30,2011 08:14:18
Correspondence Type: Web Form
Correspondence: I wish to support the GGNRA in their preferred option for the control of off leash dogs in the GGNRA. I am in favor of letting the scientists make decisions regarding the best way to protect species and plants, not emotional, self serving dog guardians.

Correspondence ID: 3866 **Project:** 11759 **Document:** 38106
Received: May,30,2011 08:52:54
Correspondence Type: Web Form
Correspondence: Yesterday I took a walk at Ft. Funston to bird and examine the native flora. I haven't been there in quite a while. I entered Ft. Funston at the intersection of Skyline and John Muir and took the northern loop trail. As I walked, I encountered more than a dozen dogs, mostly off leash or on very long leashes. Some of them approached me in a threatening manner, others were just curious. All were an annoying distraction from my appreciation of the area. As I finished my walk I realized that I was the only person on the entire trail without a dog. In the past I would see a mix of dog owners and non-dog owners. It appears that the dog owners have driven everyone else away by the lack of consideration. This needs to be redressed. There need to be bans, enforcement of leash laws (especially at 75%) is futile. I should be able to enjoy this national park just as enjoy all others where dogs are not permitted.

Correspondence ID: 3867 **Project:** 11759 **Document:** 38106
Received: May,30,2011 08:55:30
Correspondence Type: Web Form
Correspondence: Please do not implement the proposed new GGNRA draft dog management plan. It is far to restrictive, does not represent the needs of the people and pets of the greater San Francisco bay area. It does not take into consideration the negative impact on local city parks and resources. Dogs and people need to run off leash, unfettered.

Sincerely,

Karen A Lundin

Correspondence ID: 3868 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean and members of the committee developing the Dog Management Plan:

The purpose of this letter is to express my concerns about the proposed Dog Management plan alternatives. I am a tax paying citizen of the United States and City and County of San Francisco. I have a dog and I use the GGNRA with my dog for healthful exercise and recreation. The DEIS serves to inappropriately limit the rights of the tax paying public.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I want to protect the GGNRA's natural resources, I believe options other than restricting dog-walking access should be considered first. I favor an approach that truly balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternatives as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based on any documented impacts of non-compliance, just the mere fact that non-compliance occurs. Because it will change the status of areas from off- to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur. That violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be. It must be removed.

There are, however, some improvements that a modification could address for the positive, specifically as they relate to Crissy Field:

1. The crushed gravel promenade from the parking lots west past the grassy meadow is of particular concern. There are dogs on and off leash, bicycles, runners, pedestrians, children learning to ride bikes, etc. Surely you have

seen on weekends it is a mob scene and recipe for accidents. Leashing dogs in this area and eliminating bicycles would certainly cut down on the risk of injuries to all users of the promenade.

2. Enacting the 1979 Pet Policy would return the west beach to a leash free environment all year round providing more areas to ease the density of dogs rather than commit them to smaller confines as proposed by GGNRA.

3. Professional dog walkers should be limited to a manageable number of dogs per person. Some are extremely conscientious and keep the dogs engaged. But there are also the dog walkers who meet up with other dog walkers and stand around and chat while 15 to 20 dogs run wild around

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

I uphold my responsibility to manage my dog under voice control and on leash. I believe it is incumbent on all dog guardians and handlers to do the same and maintain peaceful existence at all GGNRA sites. I do not feel it is appropriate for GGNRA to arbitrarily take away citizens rights as indicated in the draft plan. There are times in the day that the majority of people using Crissy Field and other beaches in the GGNRA are people who are with their dogs. Removing dogs from the beach will overburden the city parks and other GGNRA sites and negatively affect the health of the people and dogs in San Francisco. The exercise that we humans receive exercising our dogs at the beach positively contributes to our overall sense of well being and physical condition.

After careful consideration, I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written (there is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers), and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration. Sincerely yours,

Susan Spiwak

Received: May,30,2011 09:08:42
Correspondence Type: Web Form
Correspondence: Keep our parks free of dogs and preserved for our youth and wild life

Correspondence ID: 3870 **Project:** 11759 **Document:** 38106

Received: May,30,2011 09:22:54
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean,

I am writing to oppose the GGNRA's Draft Dog Management Plan because it fails to include any site-specific documentation of existing conditions and their analysis thereof.

The document states in general the impacts caused by dogs without any reference to actual impacts already caused. As the GGNRA is made up of vast lands, specific places as well as specific impacts must be documented to support the Plan's conclusion.

There is also a lack of information on the resource degradation, i.e. what these resources are. To justify the conclusion, the Draft Plan must be able to demonstrate how the degradation of these resources are specifically caused by dogs, as opposed to impacts caused by humans, other wildlife and predatory plants and species. In other words, I ask that the GGNRA look more specifically at each area, document the impacts of all park uses, disclose all information to the public and come up with a new alternative.

Thank you for your consideration.

Sincerely, Tszsan Kathy Reichardt

Correspondence ID: 3871 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00
Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean and members of the committee developing the Dog Management Plan:

The purpose of this letter is to express my concerns about the proposed Dog Management plan alternatives. I am a tax paying citizen of the United States and City and County of San Francisco. I have a dog and I use the GGNRA with my dog for healthful exercise and recreation. The DEIS serves to inappropriately limit the rights of the tax paying public.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I want to protect the GGNRA's natural resources, I believe options other than restricting dog-walking access should be considered first. I favor an approach that truly balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternatives as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based on any documented impacts of non-compliance, just the mere fact that non-compliance occurs. Because it will change the status of areas from off- to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur. That violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be. It must be removed.

There are, however, some improvements that a modification could address for the positive, specifically as they relate to Crissy Field:

1. The crushed gravel promenade from the parking lots west past the grassy meadow is of particular concern. There are dogs on and off leash, bicycles, runners, pedestrians, children learning to ride bikes, etc. Surely you have seen on weekends it is a mob scene and recipe for accidents. Leashing dogs in this area and eliminating bicycles would certainly cut down on the risk of injuries to all users of the promenade.
2. Enacting the 1979 Pet Policy would return the west beach to a leash free environment all year round providing more areas to ease the density of dogs rather than commit them to smaller confines as proposed by GGNRA.
3. Professional dog walkers should be limited to a manageable number of dogs per person. Some are extremely conscientious and keep the dogs engaged. But there are also the dog walkers who meet up with other dog walkers and stand around and chat while 15 to 20 dogs run wild around

The DEIS fails to consider that the GGNRA is the front/back yard for a

large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

I uphold my responsibility to manage my dog under voice control and on leash. I believe it is incumbent on all dog guardians and handlers to do the same and maintain peaceful existence at all GGNRA sites. I do not feel it is appropriate for GGNRA to arbitrarily take away citizens rights as indicated in the draft plan. There are times in the day that the majority of people using Crissy Field and other beaches in the GGNRA are people who are with their dogs. Removing dogs from the beach will overburden the city parks and other GGNRA sites and negatively affect the health of the people and dogs in San Francisco. The exercise that we humans receive exercising our dogs at the beach positively contributes to our overall sense of well being and physical condition.

After careful consideration, I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written (there is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers), and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration.

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| Correspondence ID: | 3872 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation | | |

at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 3873 **Project:** 11759 **Document:** 38106

Received: May,30,2011 09:51:58

Correspondence Type: Web Form

Correspondence: You should not make any changes to the dog policy that creates a more restrictive environment for dogs than there is currently. In fact, you should change the policy to make more off leash areas for dogs. Fort Funston is a dog walking haven and should not be changed at all. Plan A (voice control) is preferable.

Correspondence ID: 3874 **Project:** 11759 **Document:** 38106

Received: May,30,2011 09:52:56

Correspondence Type: Web Form

Correspondence: On this Memorial Day my thoughts are mostly with my most respected branch of the US government - the military. Second to that service, I respect and support the National Park Service, and the work they do safeguarding our national treasures. The NPCA proposals regarding Golden Gate National Recreation Area (which you are aware of so I need not repeat them here) seem to be in the best interest of the GGNRA and the people that use it.

Thank you for the opportunity to comment on this.

Sincerely

Gary Lowderback Tustin CA

Correspondence ID: 3875 **Project:** 11759 **Document:** 38106

Received: May,30,2011 10:06:05

Correspondence Type: Web Form

Type:**Correspondence:** To whom it may concern,

I am a responsible guardian of two smallish dogs (30 lbs). We go to Muir Beach most every week and have for close to 7 years. I always keep them on leash on the path out to the beach. If I assess that the beach is too crowded with people, I keep them on leash and they enjoy sniffing their way along. If, as is often the case in the morning, there are not many people, and most of them have dogs, I will let them off leash for a run. My dogs are not water dogs, they simply like to sniff, run and play on the sand. They are both people and other dog friendly. Were they not, I would not take them off leash. I watch them constantly and always clean up after them. They are never more joyful then when they are running free at the beach. There are so few places where they can do so. I vote for Alternative B; where dogs are kept on leash on Pacific Trail and then allowed to run off-leash, under voice control, on the beach.

Thank you for providing multiple options for community comments.

Judith Forrest

Correspondence ID: 3876 **Project:** 11759 **Document:** 38106**Received:** May,30,2011 10:06:16**Correspondence Type:** Web Form**Correspondence:** Thank you for enforcing the laws and keeping dogs on leash. I have been bitten twice by dogs and am accosted by dogs constantly in GGNRA areas. Please enforce all leash laws vigorously and keep the areas safe for people and animals alike. Thank you

Correspondence ID: 3877 **Project:** 11759 **Document:** 38106**Received:** May,30,2011 10:09:00**Correspondence Type:** Web Form**Correspondence:** Dear Mr. Dean and all Representatives: I write to oppose the current GGRN dog-management plan. Current off-leash parks have long histories of serving the residents of San Francisco, and their canine companions, well, without undue restraints on non-dog-accompanied residents. To reduce the off-leash area is to create harm to the health and mental health of all residents of this beautiful city. My dog died in August 2010, but I continue to go to Crissy Field and Fort Funston for my walks, especially because I want to be able to see and greet the many beautiful dogs being given the fresh air and exercise they need. Please carefully reconsider this plan; I stand in opposition to its current restrictions. Sincerely Beth MacLeod SF

94115

Correspondence ID: 3878 **Project:** 11759 **Document:** 38106

Received: May,30,2011 10:12:42

Correspondence Type: Web Form

Correspondence: My name is Gina Eigner, I am a resident of Richmond. I love that the beaches are leash free for dogs and would be very upset if that was taken away. I regularly go to Chrissy Field, Ocean Beach and the beaches in Marin. I have my dog under voice control and believe I am very respectfully of beach goers that do not have dogs. I am also very aware of environmental issues such as bird nesting season and restricted areas, I don't believe that dogs negatively impact the environment any more than humans. I am not native to California, I moved here 4 years ago, the off leash policy to me is what makes California such a wonderful place to live.

Correspondence ID: 3879 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

[Put your personal comments here ? Introduce yourself, identify your neighborhood, say how often you use the GGNRA, and where & how often you take your dog. Counter the argument that we are "anti-environmentalists" by listing the environmental organizations you belong to, or the actions you take that indicate how important the environment is to you.

If you are comfortable doing so, indicate if you are a member of a minority group. The DEIS proposes that many seniors, disabled, or racial/cultural minorities do NOT come to the GGNRA because of off-leash dogs ? let's show how many of us come for EXACTLY this reason!)

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas

within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

_____ (name)

_____ (address)

_____ (city, state, zip)

ID:**Received:** May,30,2011 10:35:55**Correspondence Type:** Web Form**Type:****Correspondence:** I strongly support alternative D, providing the most protection for natural resources and imposing the most restrictions on dogs and their owners. In my experience, most dog owners at the beach overestimate their ability to control their dogs with voice commands and underestimate the extent to which their dogs annoy or frighten others. I go to the beach often and frequently see visitors pestered by dogs whose owners are unable or unwilling to control them. My wife was knocked over by a large dog at Stinson Beach last year. We've given up going to the beach nearest our home (Ocean Beach) and instead go to Baker Beach across town because of the large number of uncontrolled dogs at Ocean Beach.

Correspondence ID: 3881 **Project:** 11759 **Document:** 38106**ID:****Received:** May,30,2011 00:00:00**Correspondence Type:** Web Form**Type:****Correspondence:** Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

[Put your personal comments here ? Introduce yourself, identify your neighborhood, say how often you use the GGNRA, and where & how often you take your dog. Counter the argument that we are "anti-environmentalists" by listing the environmental organizations you belong to, or the actions you take that indicate how important the environment is to you.

If you are comfortable doing so, indicate if you are a member of a minority group. The DEIS proposes that many seniors, disabled, or racial/cultural minorities do NOT come to the GGNRA because of off-leash dogs ? let's show how many of us come for EXACTLY this reason!)

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon

sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

marcia spitz _san francisco, ca 94118

Correspondence ID: 3882 **Project:** 11759 **Document:** 38106
Received: May,30,2011 10:39:15
Correspondence Type: Web Form
Correspondence: I am very pleased with the GGNRA's decision in regards to the dog management plan. I am a native San Franciscan and for far too long I have

watched dogs of all sizes, off-leash, chase snowy plovers, terns, gulls and sand pipers away from resting areas and stressing them out. Far too long I have watched uncaring owners of these dogs do absolutely nothing to prevent their dogs from frightening the birds. I have also witnessed and been the victim of dogs that chase or jump people. There are more dogs in San Francisco than there are children, and they have become quite a menace due to irresponsible owners. Our beaches suffer from their selfishness and carelessness as our birds suffer. I am shocked at how few people seem to care anything about the birds. They have almost no voice if it weren't for the GGNRA. I appreciate all you do for the beaches and the bird populations. Thank you. Sincerely, Kim Mosler

Correspondence ID: 3883 **Project:** 11759 **Document:** 38106

Received: May,30,2011 10:44:12

Correspondence Type: Web Form

Correspondence: I am submitting my comments on the DEIS in opposition to the proposed plan. I support the No Action alternative.

I live in San Francisco and use the GGNRA areas with my Labrador retriever on a daily basis. I primarily use Crissy Field, Baker Beach, and Rodeo Beach/Fort Cronkrite/Miwok Trail areas. I have always supported environmental issues however I believe this plan is not well thought out and unnecessarily restrictive to a large part of the population.

My comments:

There are adequate protections for sensitive land and wildlife. The GGNRA should better maintain these protections-specifically the fencing on the beach at Crissy field where sand has covered it. This is a simple fix rather than restricting use.

I am a responsible dog owner, as most are, keeping my dog under voice and sight control, cleaning up after him and keeping him out of the restricted posted areas. It is not appropriate to restrict all dog owners for the few issues with a small percentage of dogs. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA.

It is important to keep these areas open for off leash dog walking access, especially in an area like the Bay Area with a large population. As residents and taxpayers of San Francisco, we should not be restricted from use of these areas if we are using them responsibly. The GGNRA was created to provide urban recreation areas and the quality of urban environment in these

areas need to be considered more in the DEIS. The interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so. The GGNRA was not established as a wildlife preserve and while those needs are important, there are better places for them than an urban environment where open recreational access is so critical.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) are not based upon sound science or long-term monitoring of site specific conditions. I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options besides restricting dog-walking access should be considered first.

The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site-specific information that these areas are inappropriate for continued dog walking.

Once, again, I am writing in opposition to the preferred alternate, and in support of the No Action plan.

Correspondence ID: 3884 **Project:** 11759 **Document:** 38106

Received: May,30,2011 10:46:59

Correspondence Type: Web Form

Correspondence: Please make ocean beach dog free. This is an area that I am close to and would love to enjoy without the fear of dogs and disturbance of having dogs run up to me. Furthermore, I would like to see dogs on leash everywhere and more places that don't have dogs at all. For historical reasons, elderly African-Americans often do not feel comfortable with dogs. Dogs are a symbol of racism. They were used against African-Americans and it has been my experience that this racial group (especially those of the older generation) do not like being around dogs. I realize that African-Americans are often not considered but I would urge the park to do just this. I have also noticed that dogs tend to mirror their owners. Unfortunately, people often have unconscious bias against african-americans. So it does happen that owners see a large black man and get frightened. Their dogs pick up on this and act with hostility towards that man. I know it is not on purpose but it is not ok. This is also one reason why african-americans tend not to have favorable feelings towards dogs.

Correspondence ID: 3885 **Project:** 11759 **Document:** 38106

Received: May,30,2011 10:47:41

Correspondence Type: Web Form

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

May 30, 2011

Dear Mr. Dean,

I am a Professor at Presidio Graduate School, an MBA program in Sustainable Management. We teach our students not only about the environment, and about business, but about how to effectively change the world so that we can not only survive on the planet, but flourish. The system we address includes the earth, of course - but just as importantly, humans, animals, & the places they live and work. Sustainability in all forms is an integral and driving force in my life.

My life is shared with a 100 pound Curly-Coated Retriever named Jackson; before him, there was Sam the Dalmatian. Instead of two-legged children, I raise four-legged ones, and they are nearly as much responsibility. Jackson is under voice control, and I have spent countless hours training and socializing him. A year ago we moved to San Francisco, and one major driver was the number of off-leash parks we could choose from so he could get the exercise he needs. Being off leash for him is an integral part of his health, and I care deeply about that as you might imagine.

As part of the system that the GGNRA exists in, I naturally care about preservation of natural resources. However, I do not believe it needs to come at the expense of the other parts of the system - namely, our dogs, and the humans who also enjoy roaming these grounds with them. People of all ages and races exist equally here, brought together by their love of dogs. They are respectful of each other, and watchful over their dogs. I have never witnessed an incident, and I typically am at either Fort Funston or Stern Grove every single day.

I do not agree with the proposed changes to the existing conditions (1979 Pet Policy), and I believe options other than restricting dog-walking access should be considered first. The proposed "compliance-based" approach is one based on punishing the many for the perceived issues of the few; this doesn't make sense because the peer pressure to keep these lands open & available is sufficient for all but the most unaware people to change their behavior. We have moved well beyond "carrot & stick" approaches to

motivating behavior, and I would be happy to work with you to develop some more relevant & effective ideas.

Stakeholder engagement is key to maintaining fair and equitable solutions, and your proposal that denies the public a chance to comment gives way to a lack of transparency. Instead of seeking cooperation, the GGNRA is seeking to assume autocratic control over decisions. Healthy systems encourage debate.

A sustainable urban area includes open space for recreation - and for many of us, walking our dogs each day is our primary form of recreation. They need it, and we need it as well. I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written, and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration.

Sincerely,

Dr. Donna Montgomery San Francisco, CA 94116

Correspondence ID: 3886 **Project:** 11759 **Document:** 38106
Received: May,30,2011 10:55:47
Correspondence Type: Web Form
Correspondence: I feel that dogs should be banned from more areas of GGNRA in order to protect park users and the environment. Where dogs are not banned, they should be required to be on-leash at all times for their own safety and to protect children and adults, other dogs and the environment. Dogs running around off-leash ruins the park experience for me.

Correspondence ID: 3887 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

From: Aleks Petrovitch Owner of Aqua Surf Shop Sf Ca 94116

Dear Mr. Dean,

I am writing to strongly oppose the GGNRA's draft dog management plan. It is misleading and based on "Bad Apples" whom ruin things for all of us responsible dog owners. These GGNPA area bring me and my well behaved dog, incredible peace of mind and happiness. We will not have this taken away, and are more than happy to do our part to help out to make sure responsible owners and well behaved dogs get to continue to enjoy these outdoor areas

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

* Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. * Exclude speculative, exaggerated, biased, or misleading statements and studies. * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). * Enable professional dog walking and align any professional dog walking rules with county or city regulations. * Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely, Aleks Petrovitch _____ (name) _____ (address)
SF CA 94116 _____ (city, state, zip)

Received: May,30,2011 11:03:01
Correspondence Web Form
Type:
Correspondence: Dear Mr. Dean,

I am an animal behavior and welfare professional who has worked at shelters on the east coast and, since coming to San Francisco in August of 2010, have worked for a certain large animal shelter here in the city. Upon my arrival here, I was immediately struck by the fact that not only are the attitudes of the people here generally much more friendly, relaxed, and happy than the attitudes of people on the east coast, but that the attitudes of the dogs mirror those of their owners! In Baltimore, dogs don't walk off-leash and don't accompany their owners on errands and outings nearly to the degree they do here - in fact, one almost never sees that back east. The result is tense, pent-up dogs who are leash reactive, fearful of strangers, aggressive to other dogs, and uncontrollable and unrecallable when (illegally) allowed to run off leash in parks. These dogs are allowed very little enjoyment of life and very little freedom, and their behavior and personalities are reflective of that.

Arriving in San Francisco, I was astonished to see - everywhere! - well-behaved, easygoing dogs trotting obediently and happily behind their owners, off leash, on the sidewalks of the city! None were snapping at children or other dogs, none were barreling ahead of their helplessly shouting owners, none were running into traffic. As I began to spend a lot of time in the city's parks with my own dog (also a east coast transplant), it blew my mind to see the friendly, polite interactions between all the dogs playing off-leash there. There is almost never a scuffle that isn't done in play, hardly a cross word, and hardly even any subtle, troubling body language for which we animal behavior types are constantly vigilant. In short, there was no trouble! Dogs greet and play and steal each other's toys, and nothing bad happens. This kind of overall inter-canine harmony is unheard of in Baltimore, where frequenters of dog parks (both human and canine) are constantly on edge, waiting for that inevitable fight to break out. Even my own dog, a 14 year old Shiba Inu, who never met a dog she liked in Baltimore and couldn't be trusted off-leash for even a second, has, in 10 short months here, made a complete reversal in her personality and now joins in playful games of chase with new dog friends every day in Dolores Park!

I have begun to understand why it is that dogs are almost entirely different creatures here in San Francisco: because they go EVERYWHERE and do EVERYTHING with their owners, and have the freedom to behave somewhat naturally as dogs! Dogs were not meant to be leashed, and while it is sometimes in their best interest to leash them, it just makes it all the more important that they have ample safe off-leash play space in which they

are allowed to run, play, and be natural dogs. It makes them happier, which in turn makes us happier, which in turn is one of the big things that makes San Francisco such a great place to live. I implore you, as an animal behavior specialist and as the lucky guardian of a life-changingly wonderful dog, don't eliminate off-leash areas in San Francisco. In doing so, you would eliminate a large source of this city's canine and human happiness quotient, and would create new dog problems you couldn't even imagine.

Thank you, Ian Gilmore

Correspondence ID: 3889 **Project:** 11759 **Document:** 38106
Received: May,30,2011 11:03:12
Correspondence Type: Web Form
Correspondence: I fully support Alternative B; where dogs are kept on leash on Pacific Trail and then allowed to run off-leash, under voice control, on the beach. The restoration of Muir Beach wetlands will not be harmed by dogs running off leash on sand and playing in the Ocean. There's plenty of room for dogs and people to continue to enjoy together the unique beauty that is Muir Beach. Please don't take another freedom away. Thank you.

Correspondence ID: 3890 **Project:** 11759 **Document:** 38106
Received: May,30,2011 11:04:55
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean et al.,

I am writing to oppose the GGNRA's draft dog management plan. As a homeowner in Marin County, I have found that there are very limited spaces available for residents to walk their dogs off-leash. In addition, a large part of the GGNRA prohibits dogs, even when on-leash.

Just yesterday I was told by the mayor of Sausalito that our city has more dogs than children in residence. Dog ownership is obviously an incredibly important component of our community and having access to space that provides for the development of healthy, well-socialized dogs is a significant benefit to the community as a whole.

While I appreciate that there are competing demands for the use of GGNRA, I would encourage the Park Service to honor the 1979 Pet Policy and to treat the GGNRA as the urban recreation area that it is.

Thank you in advance for your consideration.

Sincerely,

Carol Quitmeyer

Correspondence ID: 3891 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story, how the dog management plan will impact you if it's implemented, and what you've seen when you've been out at the GGNRA)

Sincerely, _____michael marinaro_____ (name

Correspondence ID: 3892 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:08:07

Correspondence Type: Web Form

Correspondence: Dear GGNRA,

I am writing in support of your limited dog management plan. I work in an area where I consistently have problems with dog owners disregarding the rights of other people and wildlife. Dog restrictions are routinely ignored and some go as far as claiming their dog is a "service animal" while the dog is pulling on its leash and exhibiting none of the qualities of a highly trained animal that provides an indispensable service to a person who needs it.

Please don't let this highly passionate and vocal special interest group get their way at the cost of other users and wildlife. Please consider the rights of people that are terrified of dogs and wildlife that may not continue to exist if dogs allowed to trample their limited habitat. Dogs should not have an inherent right to be off leash everywhere and your limited off-leash areas combined with the more appropriate city dog parks is more than reasonable.

Please consider this comment a strong expression of support for your limited dog plan.

Sincerely, GGNRA User

Correspondence ID: 3893 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:10:49

Correspondence Type: Web Form

Correspondence: I love dogs, but there are too many of them to run free through our parks. They scare wildlife, not to mention people trying to enjoy a peaceful day. Even when on leash, dog owners think it's fine their dog can come up to you and sniff. Perhaps areas designated just for dogs?

Correspondence ID: 3894 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:12:48

Correspondence Web Form

Type:

Correspondence: To Whom It May Concern, Thank you for this comment opportunity.

I'd like to strongly suggest that Muir Beach and the mountains south of Muir Beach towards Tennessee Valley and onto Rodeo beach all be a

100% NO DOG Zone.

The last three times I've been there I have seen multiple rabbits, 1 coyote, and 1 bob cat - and some one was with me for a witness.

I know from the research that people who hike with dogs will see less birds, bc the dogs run ahead and directly or more likely indirectly scare them away.

I think Muir beach and the mtns south to rodeo beach should allow wildlife to roam free with out the fear of being chased or harassed by dogs.

I also WANT to see these animals. Dogs in this area would decrease my enjoyment by scaring the animals away.

Thank you. Matt

Correspondence ID: 3895 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 30, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am a professional dog walker in San Francisco. While I do not directly use GGNRA land for my service, many of my colleagues do. The DEIS seems like it was designed specifically to discriminate against dog walkers and dog owners. There was absolutely no inclusion of a plan for increasing dog recreation. Shouldn't a balanced plan put forth proposals on both sides of the

argument?

I agree with the DEIS in that dog walkers should be regulated within the GGNRA. But the compliance based management strategy put forth in this document is the wrong way to do it. Dog walking is one of the fastest growing service industries in the country. It should be regulated and assisted by the Federal Government. In these tough economic times, the government has a duty to help maintain and grow any emerging industries to increase employment. The GGNRA and professional dog walkers should be working hand-in-hand to grow the industry, increase jobs, and create a sense of trust between our industry and the government. We should be on the same team.

Therefore, I propose the creation of a Canine Stewardship Core(CSC) to work with the GGNRA Conservancy to regulate off leash dog walking AND protect and beautify the GGNRA. Whatever damage off-leash dog walking allegedly creates within the GGNRA, surely it can be off set by intelligent projects to restore other areas within the GGNRA. I'm proposing free labor from hoards of dog lovers in exchange for access to the historically off leash areas within the GGNRA. Each side need to compromise and bring something to the table and build a relationship for the future based on trust and mutual respect.

Fort Funston specifically is needed by the City of San Francisco for off leash dog recreation. It is a dog paradise, a magical place. Whatever is done in the rest of the GGNRA, please leave us Fort Funston. And not the small area that has been outlined in the preferred proposal, but the historical boundaries created by the 1979 Pet Policy. Without it, the City's parks will be overwhelmed with dogs and the citizens of this fair City will lose one of the best dog parks in the world. I'm not a nature expert, but it seems like the land there is in good balance. Its mostly sand dunes and ice grass(an invasive, non-native species). The dogs are not doing much harm there. Fort Funston acts like a pressure release for all the dog energy in the City. Without, who knows what may happen? Has the DEIS addressed the impact on City Parks? No. We need more research.

This is difficult because the DEIS is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

I believe it is possible for the GGNRA to accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness like Glacier National Park. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. One cannot manage an urban park like a wilderness park. The thousands of dogs in San Francisco and the Bay Area need more

space to recreate, not less.

Do we need regulation of professional dog walking? yes. Permitting and regulation of dog walkers will create funds to help cities and counties maintain parks. Budgets for park maintenance are being slashes throughout the country and these funds will help keep our parks in good shape. Paying for access is completely reasonable for professional dog walkers.

Should it be "compliance-based management." Absolutely not. This gives far too much power to a group already shown to be anti-dog. The people of the County should be allowed to vote on how to regulate dog walking. It is our right at citizens of a democracy. If the NPS/GGNRA wants a cut of dog walking profits, we dog walkers should have a say in how we are governed.

This speaks to the fundamental core of our great Nation's principles. "No taxation without representation!"

I ask the NPS to create a new DEIS, one that will:

Create a Canine Stewardship Core to help the GGNRA work with and communicate with the dog community.

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and lands acquired by the GGNRA since 1979. Exclude speculative, exaggerated, biased, or misleading statements and studies in the next DEIS. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards.

Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. Recognize professional dog walking as a legitimate industry that should be nurtured and regulated by the Cities and Counties in which it occurs.

Sincerely,

John Delaplane San Francisco, CA 94117

Correspondence ID: 3896 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: <Letterhead>

Frank Dean Superintendent Golden Gate National Recreation Area Fort Mason Building 201 San Francisco, CA 94123 Attn: Dog Management Plan/Draft Environmental Impact Statement Dear Superintendent Dean:

The California Native Plant Society works hard to protect California's native plant heritage and preserve it for future generations. Statewide, our nearly 10,000 members promote native plant appreciation, research, education, and conservation through our five statewide programs and 33 regional chapters. Through membership in CNPS, Californians of all walks of life are able to support and engage in opportunities to experience and learn about native plants and their habitats, gardening and landscaping with native plants, restoration of habitat areas, and conservation issues throughout the state.

It is very important to us that the GGNRA begin to manage pet dogs in a more appropriate manner to reduce impacts to native plants and insure all National Park visitors feel comfortable experiencing the natural and historical riches of the GGNRA. After careful review of the Draft Environmental Impact Statement on Dog Management in the GGNRA, we strongly encourage you to improve the plan in the following ways:

1)Regulated Off-leash Areas should be fenced, at least in areas where fences do not restrict views or pose risks to wildlife and habitats. NPS already uses appropriate fences to protect sensitive habitats, historical resources and insure public safety, so there is a clear precedent for their use in defining sensitive areas. Appropriate fences would provide clear, enforceable boundaries between dog and non-dog areas and keep all park users safe and comfortable in their parks.

2)The Park Service's proposed requirement of 75% compliance is too low. The Park Service should initiate measures to improve compliance if the level falls below a minimum of 95%.

3)Regulate commercial dog walkers like any other National Park concession enterprise.

4)More trails in San Francisco should be closed to all dog use. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs.

While dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals, plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future

generations.

Sincerely,

Mark A. Heath Yerba Buena Chapter CA Native Plant Society Delegate to
Negotiated Rulemaking Committee for Off-leash Dogs in GGNRA

Correspondence ID: 3897 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:20:17

Correspondence Type: Web Form

Correspondence: I first came to the Presido of San Francisco as a Soldier in 1987. I have returned since leaving active service many, many times. Walking Crissy Field beach with my dogs where I used to run on duty or in the woods around the old Magazine. The opportunity for my dogs to run in the surf or play in the long grass are some of my best memories with pets now gone and some of my favorite photos of these lost friends and members of my family. The majority of pet owners, the majority of all park users, are responsible. We carry bags to clean up dog waste. We monitor our dogs when off leash and ensure they behave properly. Dogs need places to run. They need places that smell wild. Dogs that are exercised properly are happy, well behaved and socialized. Please don't remove the dog off leash areas. Because I lived there, because I kept the grounds as one of many Soldiers there, I think of the park as my past home. I enjoy now returning with my family which includes my dog to walk and remember my time there. Removing the off leash or dog allowable areas would diminish the experience. Keep the park accessible and enjoyable for all.

Correspondence ID: 3898 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:21:21

Correspondence Type: Web Form

Correspondence: Dear Sirs,

My biggest problem with your proposal and with the NPS regarding dogs in National Parks is that you have not accepted that dog-owners are a large, permanent and important user group. You have not incorporated dog access as one of your objectives. Your plans only focus on current and possible future restrictions. You do not ever show that you plan to expand or increase dog-access. Dog use should be part of your planning. Why don't you connect with various dog-groups and search for ways to increase access? Why don't you make dog-access something that is constantly being evaluated? Have you ever opened new areas? Do you evaluate current restrictions for possible change? Just as with other recreational activities,

why don't you consider new locations and new facilities? Have you ever considered dog parks within the larger park? The GGNRA is largely an urban park and placing dog parks in various locations within it would be logical and provide real public service. As with other facilities, private groups and individuals could provide funding.

Essentially, you have taken a position where dog-access is seen as a matter of restriction and not treated as an important, ongoing part of national park services and so have placed the NPS and the dog-owning community in a permanent adversarial relationship. You should accept dog-use as part of your services, be constantly looking for ways to increase it and not treat it as a one-time consideration.

Dog access should be part of NPS planning and not treated as something to oppose, restrict and minimize. We pay for the parks and we are a major user group. None of your actions and plans demonstrates that you recognize that or include dog use as one of your permanent services. Stop fighting it and make it part of your ongoing functions.

Sincerely,

Fred Schein

Correspondence ID: 3899 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:21:23

Correspondence Type: Web Form

Correspondence: As a federal taxpayer, Bay Area resident and park user, I am concerned about the negative impacts of dog-related activities on the natural resources of the GGNRA and also on the ability of the public to enjoy the park.

I appreciate all the work of the GGNRA staff and citizen volunteers in developing the DEIS, and surely the "Preferred Alternative" is better than the status quo. But in order to be even moderately adequate, the proposed plan needs to be improved in a number of ways, including: ? If there must be any off-leash areas, require them to be enclosed, and limit them to areas where there will be no negative impacts on habitat; ? Provide more trails that are free of all dogs; ? Limit dog walking in the park to 3 dogs per person, and do not permit commercial dog walking; and ? Implement compliance-based adaptive management that requires at least 95% of dog walkers to comply with the new regulations.

One of my favorite places to enjoy the natural world used to be Fort Funston, but I never go there anymore because of the way it has been taken over by inappropriate dog activity. The myth of "voice control" is clearly

evident there, with many dog owners repeatedly yelling at their non-responsive animals, further degrading what should be an enjoyable park experience. Even law-abiding dog walkers avoid places like this because of attacks on their leashed pets by off-leash dogs.

The GGNRA made a serious mistake when it adopted a policy of non-enforcement of 36 C.F.R. ' 2.15(a)(2). It is way past time to reverse that decision and to join the rest of the National Park Service in complying with an intelligently conceived regulation that is necessary to achieving the NPS mission.

Correspondence ID: 3900 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Correspondence ID: 3901 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:24:42
Correspondence Web Form
Type:
Correspondence: To Whom It May Concern:

I am writing in response to the DEIS for dog management as an environmentalist, nature-lover, Sierra Club member, National Parks Pass Holder, an outdoor educator, a San Mateo County resident and a daily GGNRA user. There is little I love more than enjoying the outdoors and teaching others about the amazing habitat we have available to us in the San Francisco Bay Area, and I believe having access to the Golden Gate National Recreation Area is a true treasure. Specifically, what makes it a treasure is that this area is in the backyard of millions of people who have learned to co-exist with natural areas. I would hate to see Sweeney Ridge riddled with houses or Fort Funston paved over to become a shopping center; I am grateful these lands are preserved by the National Parks Service.

However, they are preserved for many reasons, recreation as one of the foremost. The GGNRA is a special area- quite unlike Yosemite, the Grand Canyon and Yellowstone. It lies in an urban environment and thus has vastly different usage. Families enjoy walking the dog alongside Ocean Beach, couples snuggle on a park bench at Mori Point and young urbanites hike amongst trails in the Marin Headlands. In my experience, these users are generally responsible, pick up after their animals and throw away their trash; they love having these areas, use them often and want to see them maintained. The image the DEIS paints is quite the opposite- the dogs are vicious killers of wildlife and their humans allow them to bite others and scare off minorities. According to the DEIS, the current GGNRA is stricken with unruly and dangerous dogs and people who are ruining the area for everyone. After looking at NPS research and data, the few incidents that have occurred insinuate that there are actually very few events in comparison to the number of visitors and the effect on wildlife is negligible, if not none at all. Where are the facts, not just the "could" or "might" statements? The DEIS does not provide enough real research to justify any of its claims.

The GGNRA is an urban park. It allows people, their animals and nature to interact and live together. The Draft Dog Management plan fails to recognize the good that comes from these interactions-- that people enjoy nature and visit the park more, that these dogs are safer and better socialized and that they are a model for co-existence. In fact, I believe more land should be opened to on leash and off leash recreation as to better balance park usage. The Bay Area prides itself on diversity- gay, straight, black, white, parents or non-parents, single people, couples, dog owners or non dog owners. The GGNRA needs to reflect that instead of discriminating

against a group of park users.

I reject all alternatives in this document and believe the 1979 pet policy should remain, and dog-friendly areas should be expanded. Parks should be for people to enjoy in balance with nature- there is no research in the DEIS that suggests this is impossible (even for people with dogs). Why? Because it isn't.

Correspondence ID: 3902 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:28:28

Correspondence Type: Web Form

Correspondence: Our national parks should provide the best possible visitor experience for people, not dogs. Dogs and wildlife do not mix. Dogs should generally be banned from national parks, national recreation areas, etc. If they are allowed, the areas should be limited to reduce conflict with wildlife and they should always be on a leash to reduce conflict with other visitors. Please ban dogs from the Golden Gate National Recreation Area, or at a minimum, require leashes and only allow dogs in limited areas.

Thank you.

Tim Zadel

Correspondence ID: 3903 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:29:43

Correspondence Type: Web Form

Correspondence: I am opposed to proposed new restrictions for dogs to the GGNRA, particularly at Fort Funston, Ocean Beach and Marin Headlands. I have been a resident of the San Francisco Bay Area since I was born in the East Bay, 42 years ago. I am a homeowner and taxpayer.

Restricting access to dogs and dog owners would significantly have a negative impact on my lifestyle and I would no longer be able to enjoy the outdoors with my best friends. My dog allows me to visit these urban parks and feel safe to exercise and enjoy the outdoors alone without fearing for my personal safety. Please don't restrict access to the GGNRA for me and my friends.

Correspondence ID: 3904 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration.

Mary O'Brien San Francisco

Correspondence ID: 3905 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I
am writing to oppose the GGNRA's draft dog management plan. It is not
based in fact; instead, it relies on speculations, exaggerations, and

misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- ? Honor the original 1979 Pet Policy.
- ? Respect dog-walking as legitimate recreation.
- ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- ? Exclude speculative, exaggerated, biased, or misleading statements and studies.
- ? Provide reasonable ways to address any significant adverse impacts from recreational activities.
- ? Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- ? Enable professional dog walking and align any professional dog walking rules with county or city regulations.
- ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

While my dogs and I do not use the GGNRA frequently, when we do, I am most grateful for its existence; I try to behave in a manner that is consistent with that gratitude, i.e., I try to be a responsible and careful dog owner and park user. It is my experience that most other dog owners feel and behave similarly.

The GGNRA is public land, supported by my tax dollars and those of other users. You serve at our behest. Lest you should forget, we live in a representative democracy, where the desires of all are meant to be taken into account when the use of limited resources is being determined. This certainly includes dog owners, of whom there are many in the San Francisco Bay Area. As was pointed out above, the GGNRA is an urban recreation area; it is meant to accommodate the needs of all its urban users. I ask you to please try to remember this when you are making decisions about the use of this area by dogs and their owners. Sincerely,

Elizabeth K. Raymond Berkeley, CA 94705

Received: May,30,2011 00:00:00
Correspondence Web Form
Type:
Correspondence: May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: wilderness protection and conservation is important, but a few irresponsible

pet owners should not spoil the rights and experiences of all dog owners.
perhaps the parks could institute a volunteer "watch dog" group?

Sincerely, E DePalmer San Francisco, CA 94115

Correspondence ID: 3907 **Project:** 11759 **Document:** 38106

Received: May,30,2011 11:41:40

Correspondence Type: Web Form

Correspondence: Having lived in the Bay Area for most of my life, I've seen many changes through the years but one thing I have always been able to count on are the unique opportunities available here that aren't readily found elsewhere...not only from a quantitative but qualitative perspective. GGNRA offers some of the absolute finest opportunities given the broad spectrum of activities available to all. It would be a shame to place restrictions limiting the areas in which families are able to enjoy taking all members..even the four legged ones who are so important to us and our quality of life.

I have visited Ft. Funston several times and make the trek with my little girl and my beloved senior service dog, now retired. He is old and arthritic yet enjoys his walks on the beach even though he always requires assistance getting into the car afterward...not a small feat given he weighs 120 pounds and I am but a lone, single mom trying to enjoy local beauty with my family. Point is, that each and every time we have visited the park we have always seen respectful, cooperative, peaceful interactions amongst ALL park visitors. I have literally never witnessed difficulties between dogs and others, and have always found dog owners quite respectful of others and in terms of keeping the grounds clean. In fact, it has been my experience that dogs bring so much enjoyment to everyone, that it enhances the visits for everyone...whether they are there with their dogs or alone.

Please do NOT restrict the off leash areas. I am surprised this is even on the table as a current topic. There seems to be little to no impact in the areas currently enjoyed by dogs and their people, and that there is plenty of other open space in the same parks for folks who prefer to avoid dogs to enjoy.

Please consider keeping the off-leash areas maintained as-is and the notion that these areas are precious and vital to our quality of life.

Thanks.

Correspondence ID: 3908 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: Personally, I don't even own a dog.. but I enjoy being out on the trails with my friends, and when I have been walking my friend's dogs I like to be able to let them run free. I am a conscientious dog walker and believe that we can all live in harmony. Having to constantly have dogs on leashes isn't as enjoyable as letting one's dog run and frolic as I go on my hikes with my friends. There should simply be more areas where dogs can run untethered.

So,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I don't

Correspondence ID: 3909 **Project:** 11759 **Document:** 38106
Received: May,30,2011 11:47:19
Correspondence Type: Web Form
Correspondence: Elizabeth Ponzini San Francisco, CA 94122

Frank Dean Superintendent Golden Gate National Recreation Area Fort Mason Building 201 San Francisco, CA 94123 Attn.: Dog Management Plan/Draft Environmental Impact Statement Dear Superintendent Dean:

I am a resident of the San Francisco's outer Sunset District. Every time I try to enjoy Crissy Field or Ocean Beach, I leave the area because there are numerous off-leash dogs running mad under no control by their owners. I would like to go to the beach one day and actually enjoy it without fearing being attacked by off-leash dogs. I do not even attempt to go to Fort Funston as it is impossible to go there and not have a usually frightening interaction with not one, but many off-leash dogs. I am a dog owner and I take my dog to designated off-leash dog parks throughout San Francisco and Marin(where there are many already!). There is no need to have our nation's National Parks also serve as a defacto dog park for a few local residents and commercial dog walkers. It is very difficult to walk your dog on-leash when everyone else's dog runs up and jumps on me and often threatens my on-leash dog.

If you choose to allow off-leash dogs in National Parks, please at least contain them with fences or other clearly designated areas so people wishing not to interact with dogs can chose to do so. I do take my dog for walks in the GGNRA, but only on-leash in designated areas. I want to respect the NPS mission statement of protecting the wildlife and habitat for all to enjoy.

Why have urban National Parks if not everyone can enjoy them?

Sincerely,

Elizabeth Ponzini

| | | | |
|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 3910 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Personally, I dont' even own a dog but I enjoy hiking out on the trails with my friends who do, and when I have been walking my friend's dogs I like to be able to let them run free. I am a conscientious dog walker and believe that we can all live in harmony. Having to constantly have dogs on leashes isn't as enjoyable as letting one's dog run and frolic as I go on my hikes with my friends. There should simply be more areas where dogs can run untethered. I understand that some people don't like dogs, or think they interfere with the wildlife, other hikers, bikers, people on horse-back, but a responsible dog owner doesn't let it be a problem.. | | |

So,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I wish there were more places to hike with dogs off-leash and the laws would be geared more to the irresponsible pet-owner's not make us all suffer for some people's negligence and laziness.

Correspondence ID: 3911 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both

recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

-Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. -Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. -Exclude speculative, exaggerated, biased, or misleading statements and studies. -Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). -Enable professional dog walking and align any professional dog walking rules with county or city regulations. -Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: I have spend a good deal of time with my dog at both Fort Funston and Crissy Field and although it provides my canine companion an area to run and play, it also provides both of us a place to socialize with other dogs and dog owners, and gives us an outlet for so many to enjoy exercise and recreation with our dogs making for happy and and healthy dogs and humans. While walking my dog along the beach at Crissy Field I have even met people from other parts of the country who travel with their dogs and we often discuss how wonderful it is to bring dogs to such places and makes the Bay Area a unique place to visit. And if anything, dog owners including myself are quick to police each other when misbehaving dogs are about because the majority of us know the benefits and and honor of having such wonderful places to share with each other are our canine companions. I hope the decision is given more thought to help keep both the on-leash and off-leash areas in tact. Sincerely, Heather Miller San Francisco, CA 94117

Correspondence ID: 3912 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Web Form

Type:

Correspondence: May 29, 2011

Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

RE: GGNRA Draft Dog Management Plan / Environmental Impact Statement

The Alto Bowl Horseowners Association appreciates the opportunity to comment on the GGNRA's Draft Dog Management Plan / Environmental Impact Statement.

The ABHA is a not-for-profit cooperative association that manages the pasture boarding of horses on Horse Hill Open Space Preserve, Mill Valley, under a long-term grazing lease with the Marin County Open Space District. In addition to being experienced horsekeepers and trail riders, many ABHA members are also hikers, cyclists and dog owners, thus bringing diverse perspectives to the issues addressed by the Plan / EIS.

The ABHA actively works to preserve the cultural heritage of the horse and trailriding in Marin County. Horse Hill is one of four remaining equine facilities in southern Marin, the other three being NPS-partner stables: Miwok Stables (Tennessee Valley), Presidio Riding Club (Rodeo Valley) and Golden Gate Dairy (Muir Beach).

Riders from Horse Hill use nearly all of the available trails in the GGNRA (Marin County), including Alta Avenue, Oakwood Valley Fire Road, and the trails in Muir Beach and Rodeo Valley. We also ride many other protection roads and trails in the Mill Valley area including those on open space lands administered by MCOSSD, such as Camino Alto OSP and Blithedale Summit OSP, and those under the jurisdiction of the Marin Municipal Water District and California State Parks.

We herewith offer comment regarding the Plan's seven Marin County "Sites", plus "New Lands":

We believe it's very reasonable that "resource protection" and "visitor safety" should have highest priority in any plan, yet the NPS preferred alternatives for all Marin sites except Muir Beach appear to compromise those obligations in order to enable "multiple use" for the purpose of dog walking. We strongly suggest that alternative "D" is the most appropriate alternative for all Marin sites, providing strong protection of natural resources and a high level of visitor safety.

Alternative "D" restricts dog walking, where allowed, to on-leash only,

which is the most dependable method of controlling canine behavior when dogs are sharing space with humans and horses. "Voice and sight control" are dog-handling methods that require significant training for both dog and handler and yet often fail in stressful situations. Equestrians who ride park trails frequented by dog walkers can offer many stories of unleashed dog encounters that were unpleasant and hazardous to horse, dog and humans.

The NPS preferred alternative "C" for Oakwood Valley is of particular concern to the ABHA. It proposes the conversion of the Oakwood Valley Fire Road to a fenced and gated Regulated Off Leash Area (ROLA) of very narrow configuration. This would essentially eliminate use of the fireroad by bicycles and horses, such use being currently permitted. The Oakwood Valley Trail on the west side of Oakwood Valley is presently designated hiker-only, so under alternative "C" equestrian access to the pond at the upper end of the valley would be eliminated. While this dead-end trail might seem insignificant on its own, it represents a popular destination for horseback rides from Horse Hill via the Mill Valley Multiple Use Path and Tennessee Valley Trail through Tam Junction. Any dog management plan that reduces or eliminates trail access for other users is not acceptable.

The proposed Oakwood Valley ROLA has several practical deficiencies beyond denying access to other users. These problems include: a very narrow confined space with no options for dogs and handlers to move about the ROLA with adequate separation from others; a lack of spaciousness and sightlines that will obscure illegal or inappropriate activities; a lengthy fenced area that is a major barrier to passage of native animals across meadows; lack of safe parking on Tennessee Valley Road for the numbers of dog walkers likely to be attracted to the site; and excessive implementation, maintenance and enforcement costs. We understand that the ROLA proposed under alternative "C" for Oakwood Valley was a result of Negotiated Rulemaking Committee discussions; we believe that the unintended consequences of placing a ROLA at this location were not fully considered.

Finally, the Plan Executive Summary states that all action alternatives for Oakwood Valley would have beneficial impacts for visitors who do not prefer dogs at the park, which is not correct. The NPS-preferred alternative "C" and alternative "E" would essentially deny access to the fire road for those not willing to enter the ROLA when occupied by off-leash dogs.

We thank NPS staff for the immense effort that produced this Draft Plan / EIS and we look forward to its successful implementation in final form.

Robert Eichstaedt President Alto Bowl Horseowners Association Mill Valley, CA 94942

Correspondence ID: 3913 **Project:** 11759 **Document:** 38106

Received: May,30,2011 12:05:11

Correspondence Type: Web Form

Correspondence: Dear GGNRA, One of my favorite places to take my dog is Fort Funston. Please keep places such as Funston and Chrissy field open for our dogs to run and play. I always clean up after her and have done tons of training to keep control of my pet. We have the same goals which is to keep and protect our environment. I feel lucky and thankful to have these wonderful places to enjoy with our pets. Thank you for your consideration when you are making decisions that will impact thousands of people and their pets future. Linda M.

Correspondence ID: 3914 **Project:** 11759 **Document:** 38106

Received: May,30,2011 12:17:40

Correspondence Type: Web Form

Correspondence: Because I live in Connecticut, I visit the GGNRA only occasionally when I travel to California. Nonetheless, this issue is very important to me. I am opposed to the preferred alternative absolutely and am in favor of the "no change" option.

I have written a book, Unleashed Fury: The Political Struggle for Dog-Friendly Parks published in 2011 by Purdue University Press, about political disputes over leash laws. Too often, dogs are blamed for problems without any supporting scientific studies. The negative impact of dogs is exaggerated, while the positive benefits of off-leash recreation for humans and animals are not properly acknowledged. The DEIS fits this pattern. It does not make its case scientifically for the draconian policy for which it calls. Nor does it properly reflect the importance of off-leash walking for humans who enjoy this activity.

More and more studies are demonstrating the benefits of walking dogs for health ? both physical and psychological. Off-leash areas allow people to come together and form friendships. They are places where people can socialize and exercise, while their dogs obtain the same benefits and become better behaved in the process. Particularly in a dense urban environment, such as San Francisco, people need public spaces to exercise their dogs. Otherwise, ownership becomes difficult. The benefits of owning dogs are extensive and well documented in scientific literature. Some examples included higher levels of self-confidence and reduced stress levels. Cities across the country are recognizing this fact and creating MORE, not fewer off-leash areas.

New York City allows dogs to run free at many of its parks before 9 am. When this policy was challenged a few years ago, the City's Health Department conducted a comprehensive study of dog bites. It found that only 2.3 and 2.2 percent of all dog bites in 2004 and 2005 happened in public parks. Even those bites were not necessarily attributed to off-leash dogs. Based on these findings, the City recommended the continuation of the policy, which it considers a success. Truth be told, almost all dog bites occur on private property. A well exercised dog is less likely to be aggressive. It is also worth emphasizing that no one is calling for free roaming dogs. The current policy, which should not be changed, requires that dogs be under voice control and within the sight of their owners at all times.

From afar, what I find most distressing is the second-class treatment of dog walkers. There is almost no activity that people enjoy that the government threatens to revoke if one or a small number of people behave badly or break the law. This notion, called Compliance-based management, is unacceptable and grossly unfair to those human beings who enjoy this recreational activity. The federal government has the resources and wits to devise a means to revoke the off-leash walking privileges of anyone who does not comply with the rules. What it absolutely should not do is revoke the privileges of the well-behaved many because of the actions of a few. It is a philosophy utterly inconsistent with the spirit of American law. If a few golfers start taking target shots at people adjacent to a golf course, should all golf courses be shut down? To ask is to answer the question. Nor should dog walkers be collectively punished (a foreign concept in American law) for the actions of a few people. This aspect of the DEIS plan is an affront to all Americans ? whether they live on the east or west coast or in between.

While people in decision-making roles might not consider off-leash dog walking to be as legitimate an activity as skiing or running or anything else, they should look around and notice its popularity. This brings enormous enjoyment to people, connects them to other humans, animals and yes, the environment. It brings them outside where they come to appreciate the beauty of nature. Thousands of people have provided testimony to the Park Service about these benefits, about their concern for nature, and about their passion for this activity. I cannot think of any other issue ? nothing comparable ? for which the government simply disregards this mountain of evidence. The pattern of bias ? in favor of national interest groups and against dog walkers ? is deeply troubling to me as an American citizen. This is not a subjective observation, but one supported by the opinions of the judiciary. The National Park Service has been taken to task for revoking the 1979 pet policy illegally, with a federal court ordering it reinstated in 2005. Whenever the national park service has strayed from law, it has been to the detriment of dog walkers.

It is truly inspiring to witness the political activism of the dog walkers in the face of an agency that has been against them at almost every turn. They have not only volunteered their time on committees and researched this issue, but they have also held regular clean-up days for parks and provided other public services, such as dog training advice. There are huge numbers of dog walkers in San Francisco. The preferred alternative does not accommodate their need for off-leash areas. No Change is the best option. Otherwise, there will be enormous pressure placed on City Parks, which are simply not sufficient in size to accommodate the activity. The City Supervisors are on record against the Preferred Alternative. The National Park Service should be as well.

As it is, the GGNRA provides access to both dog walkers and people who do not want to encounter dogs. There are plenty of areas that do not allow dogs at all in the GGNRA and there are many on-leash areas. The dog walkers are asking to retain those few areas where they get their enjoyment. This was the idea behind the establishment of the GGNRA. It was to be a recreation area, where City dwellers could enjoy themselves in a diverse array of ways. Please keep it that way! "No change" is the best option.

Correspondence ID: 3915 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 30, 2011

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

Dear Mr. Dean,

My name is Bob Edwards and I live at 310 E. Napa Street in Sonoma, CA. Along with my wife, Joan Tillman, and our golden retrievers, Zachary Baggins and Zoe, I am a regular visitor to the beautiful GGNRA. We have been visiting the GGNRA since we first moved to San Francisco in 1995 with Zachary & Zoe's famous predecessor, Nicki.

We continue to visit now that we live in Sonoma. Crissy Field, Muir Beach, Rodeo Beach, Ft. Funston, Ocean Beach and the Marin Headlands and costal trails are some of the areas we have visited regularly, to enjoy the ocean, bay, scenery and solitude, walk off-leash with our dogs and socialize with friends and fellow dog-lovers. One of the last outings enjoyed by our Barclay (golden retriever, age 16) before he left us was to the GGNRA.

As members of the Board of Directors of Sonoma Valley Dog Owners and

Guardians (SVDOG), we have good reason to know that, like millions of dog-lovers from around the Bay Area, many people from Sonoma County with dogs in their families also visit the GGNRA. This is because Sonoma County has few public beaches or open spaces that allow dogs to run free with their families; even adequate dog parks are rare.

WE ARE ENVIRONMENTALISTS AS WELL AS DOG-LOVERS My wife and I treasure the GGNRA because we are rabid (no pun intended) environmentalists and animal lovers. We are members of the Sierra Club, PETA, the Defenders of Wildlife, The Wildlife Federation, Best Friends Animal Sanctuary, the ASCPA, Greenpeace and the US Humane Society, as well as Panthera (protecting big cats around the world). It is no exaggeration to say that the environment and its defense take up a lot of our time and interest. Animals, including dogs, are integral to our lives.

But we are not "eco-anarchists with an attitude." We are former Fortune 500 corporate executives ? "suits" -- now in our 70's and though we've seen our share of protests and activism, life is blissfully slowing down just a little. Along with its beauty and relative emptiness and serenity, we more than ever value the ability to walk our dogs off-leash in the GGNRA because it is open, accessible and safe -- for us and our dogs. My wife, like me a graduate of the Marin Humane Society's Canine Behavior Academy, was recently diagnosed with a serious illness and still treasures walks with our dogs off-leash, where she maintains control of them by voice, as she has for years.

DOGS - ON OR OFF-LEASH -- DO NOT HARM GGNRA ECOSYSTEMS or PEOPLE'S EXPERIENCE & ENJOYMENT OF THEM. In the time we've enjoyed the GGNRA we have seen zero -- zero -- negative impact on the environment or other visitors caused by off-leash dogs ? ours or anyone's. The number of birds (yes, the snowy plovers, too) and other wildlife we have encountered has not been diminished by the presence of dogs. Indeed, I submit they have thrived, and I have yet to see a credible study, report or incident record that seriously supports otherwise.

Most of what has been offered as a "scientific" basis for GGNRA's alleged need to restrict off-leash dogs is frankly rubbish; I would welcome the chance to cross-exam the authors of those so-called reports and studies. The junk science, exaggerations and (to be charitable) slight-of-hand errors in them would not fool a jury of 10th grade biology students.

The negative environmental impacts we've observed in the GGNRA over the past 16 years have been rare, transitory and (surprise!) the fault of humans, not dogs. It is humans who leave trash, deface signs, disturb the quiet, occasionally menace other visitors and otherwise disrespect or threaten the environment with unauthorized fires, plant "thievery" and trail

erosion from mountain biking.

Of course, who can ignore that it was humans who built a massive pollution-drenched military base in what is now the GGNRA and, in the process of so doing, permanently altered the environment beyond anyone's ability to restore it to its "native" state, short of eliminating all people.

[To the Native Plant enthusiasts who would restore GGNRA vegetation to its pre-European "native" condition days by eliminating dogs, I say: Why stop there? Why not restore it to its Pleistocene "native" state, when the entire state was under the Pacific? There is a mission and an idiocy lacking any understanding of natural history or of how plant ecosystems ebb, flow and propagate on our planet. These are not "scientists;" they are Gardeners-Gone-Wild determined to convert public land to their private plant preserve.]

Let me also be clear on the perennial "poop rap" against dogs: The overwhelming majority of dog owners always pick up the poop. Consider that there are hundreds of thousands of people with dogs who visit GGNRA regularly. If only a fraction of one percent didn't pick up after them, the beaches would be knee-deep in poop. But that clearly is not the case. I submit that, like me, Rangers find more trash and condoms than dog poop in the GGNRA.

The same can be said of distorted "incident reports" involving dogs. Given the vast number of dogs who are daily exercised off-leash in the GGNRA, if even a tiny fraction caused injuries or problems the place would be swarming with armed Rangers, the papers would be full of dog-eats-kid horror stories and citizens -- including dog owners -- would be up in arms about "out of control dogs." But that has not happened and exaggerated reports to the contrary are just that ? exaggerations, if not outright lies.

While incidents do occur involving dogs, they are rare, especially in the context of the huge number of dogs who visit there. Most are trivial and easily preventable/avoidable short of banning off leash dogs. Consider, however, that FAR GREATER and environmentally more serious incidents in the GGNRA occur because of conduct by people. Yet no one is suggesting that people be banned or restricted because of the bad acts of a relative few.

DOGS ARE HIGHLY VALUED IN AMERICAN SOCIETY We are concerned that the GGNRA does not fully appreciate that Dogs are not "just pets" these days, nor are they "livestock" or somebody's "fetish." They are treasured members of millions of families throughout the US. Google the statistics if you seriously question the importance of dogs to US households. If GGNRA had a credible means of gathering statistics, I submit you would

find that the most frequent users of the GGNRA are people in the company of their dogs.

These days, hardly a TV commercial is made that doesn't feature a dog; dog-stories regularly make the best-sellers list and pepper the nightly news, especially when they do something cute or heroic or just goofy. That's because people LOVE dogs. The national affection for canines is relevant because tourists and local residents alike routinely travel everywhere with their dogs. In crafting public policy for a National Recreation Area that exists for the enjoyment of people, it is frankly insane to ignore these realities. It is easy to wrap an open mind around the realization that in a national recreation area in a major metropolitan area, deciding to restrict or ban dogs makes no more sense than deciding to do the same with children.

THE GGNRA'S "PREFERRED ALTERNATIVE" IS SERIOUSLY FLAWED. For all of the above reasons, we do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. GGNRA is, after all, a "recreational area" at the heart of a 10-million person metropolitan area, not a remote pristine national park or preserve.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While we want to protect the GGNRA's natural resources, I believe options other than restricting dog-walking access should be considered first. We favor an approach that truly balances recreational use (including dog-walking access) with preservation. We think a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such alternatives as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based on any documented impacts of non-compliance, just the mere fact that non-compliance might occur. Because it will change the status of areas from off-to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur. That violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be. It must be removed.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA

was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

DON'T CREATE A GGNRA MANAGEMENT NIGHTMARE Lastly, in any administrative rule-making involving the GGNRA, we believe it is critical to understand and respect the cultural traditions and political sensitivities of the huge Bay Area community which surrounds it and from which the overwhelming number of GGNRA visitors come.

As a senior and an attorney, I am seriously concerned that any effort to change the current (1979) off-leash policies will result in civil disobedience, if not actually make a (totally avoidable) sport out of unlawful conduct. What the GGNRA is proposing raises the question of very real and profound long-term enforcement issues that the GGNRA is woefully incapable of managing, particularly in a time of reduced staff and budget.

Recall that your predecessor's misguided preemptory attempt to restrict off-leash dog recreation resulted in a tumultuous, angry meeting attended by over a thousand irate dog-lovers that threatened to get seriously out of hand. That led to legal action by dog lovers that blocked the GGNRA's changes, forcing it into rule making. Unfortunately, in initially ignoring the lawfully proscribed process for changing its rules, GGNRA management lost virtually all respect and credibility among dog-lovers, and brought us to where we are today.

The huge Bay Area dog-loving community has demonstrated that it is law-abiding, as its participation in rule-making demonstrates. It is capable and prepared to utilize every legal, political and public relations tool at its disposal to protect off-leash access to the GGNRA. Yet it is naive to ignore that in that mix the potential for civil disobedience is a very real possibility ? in my opinion, highly likely ? and certainly something for which the Bay Area community is legendary. Regrettably, it was the GGNRA that set a precedent for ignoring the law.

Consider, too, that technology has swept ahead since that first tumultuous meeting. Today, think of endless You-Tube video of Twitter-coordinated flash-mobs, mass disobedience and demonstrations of dogs and dog-lovers continually taxing the limited capacity of GGNRA staff to defend 82,000 acres from thousands of people with off-leash dogs 24/7. Not a pleasant prospect. Local congressional delegations could not miss the late-night comics having a field day at GGNRA's expense. The resulting footage would enliven cable news on the Right and the Left, with predictable comparisons to the "Arab Spring." Eventually the phone would ring in your

office.

WE SUPPORT THE "NO ACTION" ALTERNATIVE. For all of the above reasons and after very careful study and consideration, we support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written. There is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers, and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration.

Sincerely, Bob Edwards and Joan Tillman with Zachary Baggins and Zoe ?
(Golden Retrievers) Sonoma CA, 95476

Correspondence ID: 3916 **Project:** 11759 **Document:** 38106
Received: May,30,2011 12:31:02
Correspondence Type: Web Form
Correspondence: 30 May 2011

National Park Service

RE: GGNRA Draft Dog Management Plan

Dear National Park Service,

I am writing to voice my opposition to any added restrictions for dogs (on and off-leash) as proposed by the Park Service. Presently, people with their dogs are restricted to a small percentage of the total area included in the GGNRA. This is especially true for areas available to people who enjoy walking their dogs without a leash. The off-leash area is presently less than 1% of the total park land. I would rather the present plan be amended to provide more off-leash areas for dogs and open new lands to dog walking.

The vast majority of dog owners are responsible. They should not be further restricted because of the incidents/altercations sited in your report. These incidents represent a small portion of the total use enjoyed by the public. These incidents should not be the excuse to further restrict law abiding, tax paying citizens from using the GGNRA.

Correspondence ID: 3917 **Project:** 11759 **Document:** 38106
Received: May,30,2011 12:35:45

Correspondence Type: Web Form
Correspondence: May 28, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am life-long resident of the San Francisco Bay Area; born in San Francisco and lived in Marin since 1999. My husband and I are middle aged ~ 68 and 54, respectively and we walk our dogs only as permitted on the designated fire roads and beaches as currently allowed by the GGNRA. We use the Crown Road trailhead at the top of Kent Woodlands almost daily as it is the closest, and safest, of the current venues for off leash dog walking. Our Australian Shepherd puppy is voice trained, friendly and well-behaved. The vast majority of dogs and people we encounter are responsible pet owners like ourselves who adhere to the rules and are courteous to the other users of the fire road. We are members of the Marin County Bike Coalition Spoke Society, MALT, the League to Save Lake Tahoe, Trout Unlimited and are avid outdoor lovers and participants.

We are opposed to the current very restrictive proposal and very much enjoy the 1979 Pet Policy as it now stands. We are both concerned about the long term preservation of our beautiful Bay Area open spaces going forward, and feel that this proposed alternative is too restrictive for the residents of the Bay Area who are outdoor lovers, and responsible pet owners.

Thank you very much and please do not hesitate to contact me/us for any questions you might have.

Sincerely,

Leslie Shelton Tognazzini Roland E. Tognazzini

San Anselmo, CA 94979

Correspondence ID: 3918 **Project:** 11759 **Document:** 38106

Received: May,30,2011 12:36:18

Correspondence Type: Web Form

Correspondence: Until recently, I lived in San Francisco. I was born in the City in 1960, but moved to Sonoma because the dense urban environment of the City became too much for me and I decided to live in the countryside.

While a child in San Francisco, I had a dog and took walks and allowed my dogs to exercise off leash at Fort Funston, Ocean Beach, and Crissy Field. This was well before the lands were transferred to the GGNRA. It was legal and one of many recreational activities people enjoyed doing, which included horseback riding, hang gliding, surfing, kite flying, sun bathing, jogging, and hiking.

I understand the park service's desire and mission to protect and maintain the ecology of the parks. I understand the need to keep the public safe.

But I also know the following.

1. In 1973, the public voted in favor of the ballot amendment that deeded Fort Funston to the National Park Service with the understanding that the Park Service would maintain these lands for recreational purposes in perpetuity. The proposition passed. In 1979, consensus was reached that a very small percentage of the GGNRA would be maintained for use by off-leash dogs. This consensus statement became the 1979 Pet Policy. You are bound by that.

2. There is no conclusive, empirical evidence showing that off leash dog walking has any negative environmental impact or contributes to ecological damage. While the NPS has speculated about possible correlations between off leash dog walking and declines in bank swallow numbers, destruction of native habitat, and even cliff erosion at Fort Funston, the fact is that there has never been scientific evidence to support these claims. There is plenty of NPS conjecture, but no proof.

3. Off leash dog walking does not represent a safety hazard to the public. While there have been a small number of dog bite incidents and dog-on-dog attacks, the overwhelming majority of dog encounters in GGNRA parks are completely safe. Moreover, the majority of the bite incidents are to dog owners. Is off leash dog recreation 100% risk free? No. But neither is hang gliding, surfing, swimming, or hiking. All these are legal activities in the parks.

I am completely opposed to any ban of off-leash dog walking.

However, I do also acknowledge that there are some real problems that need addressing, which include the very large groups of dogs brought to the park by individuals that are supervised inadequately. There is also the fact that there are a small percentage of dog owners who are irresponsible - who fail to clean up after their dogs or who fail to keep their pets under proper control.

There are other solutions to these legitimate concerns. For example.

1. **PROFESSIONAL DOG WALKERS.** All professional dog walkers using the parks should be licensed and bonded and be ready to show proof when asked by a ranger. No professional dog walker should have a group of off leash dogs with them with a dog/person ratio higher than 4:1. All professional dog walkers should apply annually for a license to use the GGNRA parks. At that time, they should present their state license and bond and pay an annual user fee of \$100. This money should go toward the maintenance of the parks.

2. **NON PROFESSIONAL DOG WALKERS.** All recreational dog walkers should be held to the same 4:1 dog to person ratio. If you want to bring more than 4 dogs to a GGNRA park for off leash runs, you need more human supervision.

3. **DOG WASTE CLEAN UP.** Clean up of dog waste is required. Owners who fail to pick up waste should be very heavily fined. Perhaps \$100.

4. **DOG CONTROL.** It is essential for owners to take more responsibility for their dogs. Rather than banning recreation for everyone, it's important to establish rules of conduct. The SPCA and dog advocacy groups should be asked to help with this, and I am sure they would be glad to. There should be signage with rules for conduct posted. For example, dogs should be able to come, sit, and stay on command. Owners must immediately call their dogs to them when requested to do so by another visitor. Dogs who are aggressive to other dogs or people are not allowed and owners will be fined if they bring such a dog to the park. Etc.

5. **OWNER AND DOG EDUCATION.** There is something called a "Canine Good Citizenship" certificate which signifies that a dog is able to sit, stay, come on command as well as demonstrate good behavior when encountering strange dogs or people. I would like to see monthly obedience classes in the parks designed to help dog owners pass this test with their dogs. There are many dog trainers who would love to bring their business to the parks and teach there. Require all owners using the park for off leash dog walking pay an annual fee of \$25 per dog which would go toward park maintenance (owners would have to carry this "dog walking license" with them at all times). But any dog who passes this Canine Good Citizenship Test would have the annual fee waived.

In short, off leash dog recreation is an important part of what keeps people in the City happy and healthy. Maintaining this activity is a firm promise the NPS made to the citizenry when it took control of the land. I completely oppose efforts to ban off leash dog walking, and encourage the NPS to engage in real and honest attempts to deal with those challenges that do exist

in ways that continue this recreational activity.

Correspondence ID: 3919 **Project:** 11759 **Document:** 38106

Received: May,30,2011 12:38:45

Correspondence Type: Web Form

Correspondence: May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. Like most people, I do not enjoy stepping on dog shit! However, the proposed rules are too draconian!

Sincerely, Lance Miller San Mateo, CA 94401

Correspondence ID: 3920 **Project:** 11759 **Document:** 38106

Received: May,30,2011 12:43:56

Correspondence Type: Web Form

Correspondence: Dear National Park Service,

I've been taking my eight-year-old Black Lab to Crissy Field for years, and have always loved the stunning view, openness and friendliness of the space. The energy of all the dogs running free, often in packs, chasing the same ball, and splashing around in the Bay keeps me coming back often.

There is no other place in the city as welcoming and friendly of dogs, so whenever I want my dog Isso to have the full freedom to run as much as he wants and socialize with other dogs, I take him to Crissy Field.

The changes you propose severely limit the areas where dogs can roam off-leash. It will change the whole dynamic of the experience for dogs and their owners. Now, just like every other park in the city, we are confined to a section where all dogs must cram in if they want to run off-leash. The sense of openness and freedom at Crissy Field will be lost forever.

My favorite thing to do at Crissy Field is walk the length of the park with my dog until we reach the Warming Hut, where I grab a hot chocolate and watch people. It will not be the same experience if he has to be on-leash for most of that walk. The whole purpose of bringing him there in the first place

was to allow him to be a dog and run freely with other dogs.

Thank you for your consideration of keeping things the way they are. Please don't let a good thing go, especially for the myriad dogs in the city and surrounding areas that look to Crissy Field as the ideal place to let loose and have fun.

Beverly Parayno

Correspondence ID: 3921 **Project:** 11759 **Document:** 38106

Received: May,30,2011 12:44:39

Correspondence Type: Web Form

Correspondence: I commented early on in the process and in person at the open house. My perspective however has changed a bit through the process. I agree we need some sort of reform. Seeing the animosity arise in the city over this issue made me realize that its not working as well as it could be.

I still strongly believe we need to maintain off leash dog walking areas for dogs under voice control

I still strongly believe the "compliance" language in the document that would strike all off leash areas needs to be stricken. No where in our society is there 100% compliance with any law. Our prisons wouldn't be overflowing if that were the case.

What I'd like to see is a solution that meets the needs of all San Franciscans, the entire community. I've lived in SF for 30 years and walked my dogs for over 20. I know the rhythms of usage. I'm in the parks every day.

Make Chrissy Field off-leash only before 10am. It's become so populated since the "renovation" that it really is a recreation area for people. It's not a natural area any more. It's an outdoor entertainment center. And dogs shouldn't be off leash during high use times.

Make Ocean Beach seasonal or timed access. Either open to off leash Nov - May or before 10am. The weather is what dictates visitors at this beach.

Make Baker Beach people only

Turn Fort Funston into this country's world class status dog park. Rent out space like in Curry Village to a dog washing facility/coffee bar like at Pt Isabel and generate revenue to offset the costs of maintenance. Leave the entire area off leash, including the horse trail (which hasn't been groomed for horses for years. Its impassable for riders at the north end due to tree

overgrowth.)

Is obvious you need a solution that will rally support vs divide us. I think most dog owners want to comply and find a solution that meets the needs of the most people possible.

Correspondence ID: 3922 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration.

Correspondence ID: 3923 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00

Correspondence Type: Web Form
Correspondence: May 30, 2011

Frank Dean, General Superintendent
Golden Gate National Recreation Area
Fort Mason, Building 201
San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, misleading statements and inaccurate data. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can, and already does, accommodate both recreation and conservation. It was designed as an urban recreation area, not a wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 Pet Policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. That remains true to this day. If anything, we should open up more areas to off-leash recreation to minimize the environmental impacts on these areas, as the population of this user group grows and more people use these areas daily.

Over the past 20 years, we have learned a lot about how concentrated farming operations is not an environmentally safe or viable way to manage lands used for ranching/farming. It stands to reason, concentrating your biggest user group into small and smaller areas will only create environmental harm and destruction. Environmental destruction due to overuse and concentrating users into tiny areas is completely avoidable if we simply start with the 1979 Pet Policy as a template and expand from there, to areas already being used by people with their dogs. The gross majority of this harmless user group naturally gravitate to using areas that are safe for this activity. The most reasonable and responsible way to manage these lands is to look to what is working, and then change policy based on the successful use of these areas. What is happening now is working extremely well and is very successful. Actually, it was even better off before the 12-acre closures happened at Fort Funston and the renovations that occurred at Crissy Field, which have already proven to have negative impacts on the surrounding landscape (it's simple and obvious just to look at what the areas looked like before the closures and now some years after - Crissy Field

looks like a theme park, it's horrible - it is no longer the wild and natural landscape, with a thriving wildlife population, like it once was). Do not let a small number of outspoken people negatively influence the health and sustainability of these areas further because they do not like dogs in particular; that's not a reason to change policy for a vibrant and well-used recreational area that supports a unique ecology 'as is'.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- * Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

- * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies.

- * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

- * Enable professional dog walking and align any professional dog walking rules with county or city regulations.

- * Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. SFRAW is a San Francisco based, green food co-op that is 100% volunteer-run and member supported. Founded in 2003, we have over 450 paid members. Our focus is on sourcing local, sustainable whole foods from small family farms that practice "beyond organic" humane farming methods and promoting natural lifestyles for both people and companion animals. Sincerely,

Kasie Maxwell Founder, San Francisco, CA 94124

Correspondence ID: 3924 **Project:** 11759 **Document:** 38106
Received: May,30,2011 12:55:45

Correspondence Type: Web Form
Correspondence: Please keeps dogs out of sensitive wildlife areas, particularly in urban parks such as the Golgden Gaste Recreation Area.

Correspondence ID: 3925 **Project:** 11759 **Document:** 38106

Received: May,30,2011 12:59:30

Correspondence Type: Web Form

Correspondence: I DO NOT SUPPORT OFF-LEASH DOGS IN NATIONAL PARKS.

I am a 20 year San Francisco home owner AND a dog owner. I do not want off-leash dogs in any of our parks.

Dogs are dangerous and frightening. My dog was recently attacked and almost killed by three Great Danes that were off-leash. It was a horrible experience.

Only if dogs are controlled will I ever feel safe again.

Thank you.

Sharon Starr

Correspondence ID: 3926 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: 5/30/11 (date)

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by

either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County and Marin County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: We need more open space for dogs, not less. Dogs are hugely beneficial to the physical, mental, and environmental health of our community. They provide so many people with inspiration to exercise and socialize, they are faithful companions, they provide proven health benefits lowering blood pressure and relieving stress, they bring people together, they are a more ecofriendly option to having children in a world which is overpopulated, demanding and consuming much less waste than a human child, they are great teachers, and they are magnificent in their own right. Dogs deserve space to run and play. Taking away this natural need will cause problems instead of solve them. Making some trails off leash and others on leash allows for the difference in needs for dogs who are good off leash and those that are not. Beaches such as Muir and Stinson/Seadrift are perfect places for dogs to romp and play. They are fine how they are currently set up with the dogs allowed on the sea drift end of Stinson Beach. The health of our community

is reliant in part on dogs having many places to romp and play with their owners.

Sincerely Donna Marks Lagunitas CA 94938

Correspondence ID: 3927 **Project:** 11759 **Document:** 38106

Received: May,30,2011 13:10:14

Correspondence Type: Web Form

Correspondence: Thank you for the opportunity to comment on the dog plan.

My husband and I are residents of Pacifica and live within walking distance from both Milagra Ridge and Mori Point. We have lived here for 33 years and feel extremely fortunate to have GGNRA sites on the coast in Pacifica for the public's enjoyment.

Both Milagra Ridge and Mori Point allow dog access if on leashes. I have never seen the leash law enforced at these parks although I have always encountered dogs off leash in both these parks whenever I go.

I have experienced the following stressful situations at both parks:

-physical and emotional distress caused by uncontrolled dogs aggressively running towards my husband and/or I, and jumping on one or both of us;

-dog attacks by unleashed dogs on leashed dogs;

-several heated conflicts between myself/husband and non-compliant dog owners;

-damage and destruction to fragile native plant restoration projects by unleashed dogs running off trails;

-injury and death to indigenous animals caused by uncontrolled dogs running after and attacking them;

My husband no longer accompanies me to the parks anymore because there is usually a frightening or unpleasant encounter with an off-leash dog and/or its owner whenever he goes. He is afraid of being bitten by a dog or getting into an altercation with a dog owner.

I do not think it is right or in the public's interest to let non-compliant dog owners prevent safe enjoyment of the parks by other users, or allow their dogs to damage native habitats because they want to let their dogs run free.

Since the leash law is not or cannot be enforced at Milagra Ridge and Mori Point parks I support an alternative to the leash law that prohibits dogs from these parks, and designates space within the north San Mateo park system that allows free-running dogs in an area which will not adversely impact safe and enjoyable use by all people, and will not cause damage to native environments. I would think the issues I've experienced are not specific to just the above mentioned two parks and so think this alternative should apply to other parks as well, but I can only speak from personal experience at these two.

Thank you for the opportunity to provide comments and suggestions.

Correspondence ID: 3928 **Project:** 11759 **Document:** 38106
Received: May,30,2011 13:17:37
Correspondence Type: Web Form
Correspondence: What is the difference between keeping dogs on leash vs. off leash in a national park? The same amount of "damage" will happen regardless. Not to mention the fact that humans will cause more damage than any off-leash dog can do. How can an off-leash dog harm the wildlife more than people grilling out, playing frisbee, dumping drinks out on grass, etc? If I go to Fort Mason green area, there are more people doing damage than any dog off leash could dream of doing. I imagine this is the same case at any park in the area.

Correspondence ID: 3929 **Project:** 11759 **Document:** 38106
Received: May,30,2011 13:25:57
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean,

I am writing to oppose the GGNRA's Draft Dog Management Plan because it consists of many undocumented assumptions that do not support its conclusion.

It fails to differentiate between the impacts of dogs, humans, other wildlife and predatory plants and species. The US Fish and Wildlife did not recognize Ocean Beach and Crissy Field as critical habitats for the snowy plovers. Specific potential habitats of garter snakes in the GGNRA as well as impacts caused by dogs are also undocumented. As such, the need for the proposed management plan is not established.

It is questionable that noncompliance (of dogs going off-leash in on-leash areas) will necessarily cause any impacts. I ask that the GGNRA reevaluate

its logic behind its arguments and look at the baseline conditions in specific areas before coming up with a new alternative.

Thank you for your consideration.

Sincerely, Tszsan Kathy Reichardt

Correspondence ID: 3930 **Project:** 11759 **Document:** 38106

Received: May,30,2011 13:27:24

Correspondence Type: Web Form

Correspondence: First I appreciate the opportunity to contribute to the dialog and provide input on the policy regarding dogs in the open space area of the GGNRA. My thoughts are guided by being an avid outdoors person more than 50 years! I have also worked as a naturalist in the National Park Service, as well as led groups of young people and adults in the outdoors on mountaineering, rafting and hiking adventures.

For the past 25 years, whenever I'm hiking (and at times biking) in the U.S. I'm doing it with my on leash dog. Here are a few ideas and suggestions for why an on-leash dog policy is a good one:

1) Recruiting Future Stewards of the Outdoors - As a life-long advocate of the environment and an outdoor educator, I believe it is important to get as many people as we can into the open space, enjoying and appreciating all it has to offer. Children and families that have a family dog want to bring it with them to the open space. The no dog policy will eliminate their ability to fully appreciate our parks and those children will never know the value of keeping and preserving our parks.

2) Public Health Value - At a time when obesity is at epidemic level and free or low cost recreational opportunities for children and families are going away, the parks serve as one of the best venues for life-long health and fitness. I also believe that dogs are some of the best "get up and move" advocates we have. If you have a dog, you know that you have to get out and walk them. In turn, you get your exercise, and have a much better level of health and fitness with your pet. So, if there is a "no dogs" policy, families with dogs will not be able to appreciate the trails in the park and will get less exercise and health benefits.

3) Safety ? I am a woman who walks all times of day (and sometime evenings) without another person with me and I feel I need my dog with me. I have met more then enough crazies and creepy folks on the trails, in a variety of remote areas, to believe that I would not feel be safe to appreciate our parks without him. If dogs were banned, it would take away my access

to the parks. This past week I was stalked and chased by a coyote in the Rancho. It was snarling, yapping and came within five feet of my dog and me. This went on for 30 minutes before I made it back to a clear open space. My dog stood between the coyote and me and I believe without him there could have been a distinct possibility of getting bit by this animal. In all my years of hiking and walking in this area, I have never before had such an encounter, however, I was relieved that I had my dog with me.

My recommendations for the GGNRA dog policy are:

1) On-leash dog policy ? I strongly recommend an on-leash dog policy. I do not believe that the majority of dog owners, who say they have "voice control", really have voice control. I also think it is not a good idea to have dogs off leash anywhere in the park, particularly after this last encounter with the coyote. I know if my dog was off leash, it would have been a disaster for all beings involved.

We share this open space with hikers, birders, children, bikers, seniors, and wildlife. Everyone can enjoy this amazing environment if dogs are on leash. If they are not, there is a constant risk of kooks with no control of their canine friends.

2) A strong enforcement policy ? I have walked many times on Milagra Ridge and have found that dogs, people, bikers and seniors can appreciate the area and enjoy a relaxing day at the park. Part of the reason for that is the strong enforcement of the on-leash policy. People know that Rangers patrol the area (particularly on weekends) and therefore comply with the policy.

3) If the GGNRA is going to offer a ROLAs option, my recommendation would be to have access limited and restricted to dawn-8 a.m. and 5 p.m. ? dusk (or 4 p.m. until dusk during PST). I also recommend NOT having dogs in "Area 1" because it is adjacent to the school and there is no good public access point currently available.

The current trailhead in Montara is not workable given it is in the middle of a residential area and next to a school. There has been strong opposition to the LeConte trailhead already and Second Street is semi-private, narrow, unimproved dirt road. If individuals parked cars at either of these locations it would cut off fire department access to the homes and the Rancho.

Another ROLAs option would be to have a similar policy that was instituted in 1979's advisory commission for Marin County's Whitegate Ranch. That policy allowed for an Advanced Dog Training Area where use is restricted to owners and dogs that have successfully completed basic obedience training and are in process of advanced obedience or special skills training

(i.e. search and rescue, etc).

I also want to note that I have been very uncomfortable with the negative and disrespectful tone that some members of the "dog advocate" communities have demonstrated. These individual do not speak for many dog owners in the bay area, and certainly not for me. Their anger and disrespect should be channeled to the dog owners who have, for many years, not taken control of their dogs and their behavior. This is not a GGNRA problem; it is a bad dog owner problem.

I strongly advocate that you not penalize all dog owners for a percentage of bad dog owners. I would however strongly encourage an on leash policy with strong enforcement policy for those who cannot comply with the regulations or a contained ROLAs option. With that, we can all enjoy this amazing and spectacular area together.

Correspondence ID: 3931 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; it is misleading & is not backed up by science or the law. I am a longtime resident & dog owner of San Francisco. I live in the Sunset District, and I run a fulltime professional dog walking, dog training & pet sitting business. I also sit on the board of the Friends of Animal Care & Control in San Francisco.

The number one thing that came to my mind upon reading this document & attending the public meetings was: "Wow. Where did all these rangers come from??" I walk daily, sometimes multiple times per day at Fort Funston and/or Ocean Beach & have for many, many years. I can count the number of rangers I have ever encountered there on one hand. This is a HUGE part of the problem. We already have existing laws regarding voice control, scooping poop, dangerous dogs, etc. The fact is that there is nobody enforcing or educating about the current laws. Making new laws is not going to solve this problem because the rule followers are not the problem. There is nothing built into this plan to plan for how this will be measured or enforced ? and since it is not being measured or enforced now at all ? the "compliance based management strategy" is an extremely slippery slope.

Regarding professional dog walkers, San Francisco Animal Care & Control already has an existing list of guidelines for professional dog walkers in terms of the maximum number of dogs per walker, maintaining voice control or leashes, scooping poop, preventing digging & chasing etc. Most responsible dog walkers have already voluntarily agreed to follow these

guidelines & are in favor of regulation, but there is not enough education or enforcement about these policies either. The current city guidelines regarding professional dog walkers can be found here: <http://www.sfgov2.org/index.aspx?page=1083>

Thank you, Courtney Gunter Durbin

Correspondence ID: 3932 **Project:** 11759 **Document:** 38106

Received: May,30,2011 13:33:24

Correspondence Type: Web Form

Correspondence: Hello, This is the second time I am writing to oppose the GGNRA's draft dog management plan. I am a longtime resident & dog owner of San Francisco. I live in the Sunset District, and I run a fulltime professional dog walking, dog training & pet sitting business. I also sit on the board of the Friends of Animal Care & Control in San Francisco.

True voice control works. If it isn't working, it is NOT voice control. If you cannot call your dog off of chasing a bird or digging a hole, then your dog is not under voice control, and should be leashed. This is already the existing law, though it is never enforced. In fact, many park users do not have any idea that they should prevent their dog from digging or chasing birds as there is little to no education & inadequate signage. Even a small amount of education & enforcement would go a long way. In fact, the only people I ever see educating the public on these rules is the professional dog walkers. I often ask people to prevent their dog from digging, or chasing birds. I remind them to scoop poop, and I ask them to leash their dog if he is not under control. I often see other dog walkers educating the public & self policing these parks that we use daily, but I see zero enforcement or oversight otherwise. Off leash freedom should be a privilege for trained, trustworthy, social dogs under voice control -- THIS is what we should be enforcing.

A trained dog under voice control causes no more trouble than a leashed dog does, and possibly less, considering that leashed dogs often show different behaviors than they would show off leash. They are more likely to be reactive, less likely to feel social with other dogs & people, more likely to be frustrated & pent up. Fencing in has a similar effect. Taking a city full of a huge number of dogs & leashing them all up or fencing them in will not create less conflict, but will create more. Dogs need to run & exercise daily, and without that release develop behavior problems. They are much more likely to be reactive when feeling restrained, confined & over crowded.

Take the example of Stern Grove on "Tsunami Friday." Several fights broke out due to so many frustrated dogs who could not get the exercise they

needed in that crowded environment. Confining the vast numbers of dogs residing in this area to enclosed spaces will cause far greater problems than allowing trained voice control dogs to retain their offleash freedoms. As a trainer, I can't think of a better way to ensure more dog behavior problems than to take away their ability to get appropriate daily exercise while living in a densely packed city, with a high expectation on dogs to be social & well behaved. We will be setting dogs & their owners up to fail.

Comparing an open recreation area like Fort Funston to a fenced in dog run like the one at Golden Gate park is comparing apples to oranges. These are not equivalent options. Fenced in parks are not healthy environments for many dogs & many dogs will simply not be able to get their exercise needs met here at all, especially when they become over crowded & dangerous. Not to mention, confining dog owning humans to fenced in parks also greatly limits their ability to get the exercise they need & want. It is an important recreation outlet for us as well to walk with our dogs. These fenced in parks do not allow any outlet for human exercise & recreation ? as we hear so much about Healthy SF ? fencing in the people is totally counter intuitive.

Thank you, Courtney Gunter Durbin The Whole Pet 2350 27th Ave San Francisco, CA 94116

Correspondence ID: 3933 **Project:** 11759 **Document:** 38106

Received: May,30,2011 13:35:53

Correspondence Type: Web Form

Correspondence: Hello, This is the third time I am writing to oppose the GGNRA's draft dog management plan. I am a longtime resident & dog owner of San Francisco. I live in the Sunset District, and I run a fulltime professional dog walking, dog training & pet sitting business. I also sit on the board of the Friends of Animal Care & Control in San Francisco.

Regular dog walkers, both professional & personal are the daily users of these parks, rain or shine. We love these parks & take care of them. Who organizes the beach & park cleanups monthly? Who picks up the trash & broken glass left behind by human visitors? Who is the first to notice if there is an environmental change occurring & speak up about it. The reality is that the dog walkers are the guardians of these parks. I almost always have a poop bag containing trash & glass to throw out as I walk. I tell others (usually non-professionals) to prevent their dogs from digging & chasing birds. In fact the only people I see enforcing these rules are us! I am a dog walker AND an environmentalist (as many of us who chose a career that takes us outside daily are) so I am concerned when I see a change or a

problem at the park & I act to do something about it.

A good example was when we were all tear gassed at Fort Funston thanks to the police running a drill at the shooting range across the street. People & dogs were getting very sick. The authorities came to inspect but did not put up any signs or prevent people from continuing to enter, though there was clearly a dangerous situation as many dogs, people & especially children can have strong reactions to tear gas ? and at first nobody realized what it was, just a strange chemical smell in the air & in our throats & that people were vomiting, passing out, at least 2 dogs had seizures. Who voluntarily stood in the parking lot all morning, telling folks to avoid walking here today? Who called the authorities in the first place to alert them to the problem? Who reported it to the news so word could get out? All dog walkers of course. These parks are our office & our backyard. We love them & seek to protect them.

Thank you, Courtney Gunter Durbin The Whole Pet 2350 27th ave San Francisco, CA 94116

Correspondence ID: 3934 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Friends at GGNRA ?

I am writing to you as the Governor's appointee to the 3rd Supervisorial District of the County of Marin, formerly held by the late Charles McGlashan. I also live in Sausalito and am a longtime Southern Marin resident. I do not envy you this particular task, and I offer comments that have been gleaned from many conversations with Southern Marin residents regarding the proposed dog leash regulations.

I have great respect for the need to preserve and restore this treasured recreation area in the midst of a bustling urban center, and think that most of the proposed changes strike a reasonable balance between what the strict environmental protectionists would want on the one hand and what the dog lovers would want on the other.

The following general comments apply to the proposal overall:

1. Continuous trail loops will encourage more active engagement with the environment while exercising. Many people, especially those who are aging, walk their dogs on trails such as this as their main exercise. We are all working towards similar goals of a healthier and more vibrant community

and loop trails would serve those goals.

2. Education and signage: Education and explanatory signage will go a long way towards the goal of keeping dogs out of sensitive habitat. Most people want to do the right thing, they just need to understand the details of habitat protection. Making it clear that people AND dogs must stay on trails and roads and avoid going cross country should be enforced throughout the area. (This seems particularly apropos of the Homestead Valley alternatives.)

3. Specific times for ROLA would allow some flexibility and would create optimum visitor experiences for those with and those without dogs.

We also would like to make a few specific points on behalf of the constituents on this side of the bridge:

Oakwood Valley Fire Road and Oakwood Valley Trail to Alta Trail: The most striking concern here is the gated and fenced dog run concept. We have heard anecdotally from several members of the "Dog Tech" subcommittee (Roger Roberts, Capt. Cindy Machado, Jane Woodman and Sonya Hanson, among others) that there was in fact not consensus regarding this ? and the 'assent' that was heard at the meeting was meant to be ironic. The gated and fenced idea seems to run contrary to the hoped for experience that being out in nature would provide.

We would request that the Oakwood Valley Fire Road and the Oakwood Valley Trail be a continuous loop with 'dogs on leash' at a minimum (off leash would be preferable) and that the connector to the Alta Trail and up to Donahue be designated as 'dog-friendly', as well. It would be preferable to leave this trail available for dogs along its entirety, creating a loop that can be accessed from several different points (Tennessee Valley Rd, Donahue St. and the Orchard Fire Rd). Please note that there is the appearance of an equity issue here, as the trail is primarily accessed at the top of Donahue in Marin City. This is a community with some of the highest rates of heart disease, diabetes and childhood obesity in Marin. Having this loop accessible to all ages in this community, and especially children, is seen as a critical component to creating a healthy community.

Marin Headlands: Again, we would like to suggest that as many loops be created as possible with fewer dead-end trails. It would certainly be acceptable to have both off-leash and on-leash areas, but it seems that dogs on leash should be allowed on sidewalks and roads. For instance, the intersection of the Rodeo Valley Trail could be connected at McCullough to the Coastal Trail, which would provide a great deal of variety and options for trail choice.

We hope that NPS will continue to make the recreation area as accessible to

all as possible. In reviewing the Transportation Plan, it is clear that getting people out of their cars and out into nature is the goal, which we applaud. While we strongly support protecting vulnerable habitat, we are concerned that the current plan would leave Muir and Rodeo as the only beaches in the Marin portion of the GGNRA where dogs would be allowed.

Fort Baker: Please consider including the Parade Grounds, Drowns Fire Road and East Road for dogs on leash.

I think the vast majority of dog owners are good citizens and strive to make sure that their canine companions are good citizens, as well. Try as we might, there will always be the rare bad actors and bad visitor interactions. Making it clear where dogs are prohibited gives the "no dogs" visitor the option to be in a 'dog-free' zone, and fair warning on other trails that they are likely to encounter dogs there. Similarly, dog owners can feel comfortable that they can enjoy time outdoors in this splendid and treasured place on trails where they are indeed welcome.

Thank you for considering these points. I look forward to seeing the comments once you have collected them all. As I said at the top of this letter, I do not envy you this task, but very much appreciate your dedication to improving the experience for all.

Best regards,

Kathrin Sears

Correspondence ID: 3935 **Project:** 11759 **Document:** 38106

Received: May,30,2011 13:38:31

Correspondence Type: Web Form

Correspondence: Hello, This is the 4th time I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; it is misleading & is not backed up by science or the law. I am a longtime resident & dog owner of San Francisco. I live in the Sunset District, and I run a fulltime professional dog walking, dog training & pet sitting business. I also sit on the board of the Friends of Animal Care & Control in San Francisco.

Much has been said about the lack of scientific support for this document, and the fact that this is a recreation park, not a museum, not Yosemite. Fort Funston is cold, foggy & covered with non-native ice plant. There are missile silos under the parking lot & a shooting range across the street. It is not a place to go have a picnic with your kids. There are lots & lots of places to go have a dog free picnic but there are very few places to let dogs get the

exercise they need to live safely & harmoniously in this urban environment.

This plan is dangerous to the health & wellbeing of park users, human & canine alike. The "preferred alternative" is not acceptable, relies on hypotheticals to support it instead of scientific data, and goes against the values of the Bay Area where these parks reside. It is overly restrictive & not remotely "balanced." A new plan must be developed that allows for true balance & co-existence of park users. This must include specifics regarding education & enforcement. Condemning all dog owners for the actions of a few irresponsible park users is not "balance." Non-dog-owning park users also cause disruptions to birds & the environment. Irresponsible park users of all types should be considered in the management plan.

This plan has been opposed by the city supervisors & all local neighborhood groups. Several dog experts including Jean Donaldson, Ian Dunbar & Cesar Millan have made statements against the plan, and supported the fact that dogs need open space & real exercise to be healthy, and to prevent behavior problems & aggression. There is no scientific data to support the idea that offleash dogs under voice control cause any more problems than leashed dogs, or human park users, their children, their litter, their vehicles, etc do. The courts have repeatedly upheld the existing 1979 pet policy, for good reason, as it reflects the needs & values of this area, and should continue to be respected. If this is to change, it needs to be done with true scientific study & accurate reflection of the needs of this community.

Thank you, Courtney Gunter Durbin The Whole Pet 2350 27th ave San Francisco, CA 94116

Correspondence ID: 3936 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30, 2011 Frank Dean, General Superintendent GGNRA Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, I support continuing to follow the existing guidelines drawn up in the 1979 Pet Policy. Indeed, I recommend opening more off leash areas within GGNRA. If there were more open areas, I would use them as well. People with dogs use parks daily. I have been a resident of California my whole life. I have been a Bay Area park user my whole life as well. I went to Ocean Beach almost daily from 1977 until 1984 when I moved from the neighborhood. I work in San Francisco so I still visit regularly. I have been walking with dogs in San Francisco and Marin since the 70's. I also recreate with my dogs at Crissy Field and occasionally Fort Funston. Look back at the newspapers, many of us were worried when the proposal to

create the National Recreation Area was first put forward, but we were assured time and again that there was to be no threat to the current recreational uses. I would like to see that promise maintained. It is the right thing to do. Especially in this densely populated urban area. I recommend stronger enforcement of poop pickup rules as I feel many who oppose dogs really object most strenuously to dog poop not dogs themselves. Please continue the current boundaries or even better, expand the off leash areas to include more GGNRA parklands. Of the choices presented currently I support a modified Alternative A (the "No Action alternative"), the 1979 Pet Policy. But add to that off- and on-leash access on GGNRA lands in San Mateo and on new lands that will be added to the GGNRA in the future, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration.

Sincerely,

Margaret Pinter Home: Oakland, CA 94618

Work: San Francisco, CA 94103

Correspondence ID: 3937 **Project:** 11759 **Document:** 38106

Received: May,30,2011 13:47:42

Correspondence Type: Web Form

Correspondence: I am a resident of San Francisco, who regularly uses the Crissy Field and Baker Beach areas of the Golden Gate National Recreation Area (GGNRA). I use both areas, but especially Crissy Field, for bird watching, and Baker Beach for sunbathing. I support the general goals of the Draft Dog Management Plan (DDMP): to prohibit dog use in areas with natural resources that would be adversely affected by dog use or areas where there would be conflicts with other recreational users; and to permit controlled dog use in other areas. However, the DDMP should be improved in several respects.

At Crissy Field, the National Park Service (NPS) should re-consider the feasibility of having a ROLA almost immediately adjacent to the Snowy Plover Wildlife Protection Area (SPWPA). The map of Crissy Field appears to show the ROLA ending a bit to the east of the SPWPA. The "no dogs" area should include all dune areas immediately adjacent to the SPWPA that provide potential habitat for Snowy Plovers.

Generally, when I visit the SPWPA there are numerous off-leash dogs, even though the SPWPA is signed for on-leash use only during the times of year when I am there. (The reports of the Snowy Plover census also show

significant non-compliance with the on-leash requirement.) As a result I generally don't see any Snowy Plovers. One evening, I visited at a time when there were no dogs present, and the Snowy Plovers were readily visible. I am afraid that if there is not a significant barrier between the ROLA and the SPWPA, numerous off-leash dogs will enter the SPWPA. Accordingly, if the ROLA and the no dog areas are immediately adjacent to each other, it will be necessary to erect a barrier between the two that dogs will be unable to cross. Before erecting such a barrier the NPS will need to consider whether such a barrier will have any adverse effect on the Snowy Plovers (e.g., by providing perches for bird predators).

In any event, the signs restricting dogs from the SPWPA will need to be more numerous and clearer than at present, so that it is impossible to enter the SPWPA without seeing a sign that says "no dogs". Currently, it is possible to enter the SPWPA without encountering a sign (e.g. by crossing the wall separating the SPWPA from the parking lot behind the National Marine Sanctuary Parking lot). Furthermore, the current signs need to be improved so as to more clearly prohibit dog use; at present the most prominent component of the signs are the words "Wildlife Protection Area". The most prominent component of the sign should be "NO DOGS" in large letters, accompanied by the symbol for no dogs. I support the use of the Airfield at Crissy Field as a ROLA, as that is an area where dogs will not interfere with wildlife or other users.

At Baker Beach I strongly support having a portion of the beach off limits to dogs. I also support the dog prohibition for Marshall's Beach and adjacent beaches to the north of it. The NPS should consider whether the area near the mouth of Point Lobos Creek should also be off limits to dogs. I used to see many birds hanging out at the mouth of the creek, although I have not seen them in recent years.

The Compliance Based Management Strategy needs to be improved, particularly with regard to areas where dogs are prohibited in order to protect endangered species and other wildlife. It is not clear how the 75% threshold would apply to an area where dogs are prohibited. Does this mean that if 24% of the dogs in an adjacent area where dogs are allowed enter the "no dogs" area there would still be no "Secondary Management Response"? If so, that is totally inadequate. An increase in restrictions in adjacent areas should be imposed whenever there is significant, continuing non-compliance that results in disturbance to the protected wildlife, regardless of the percentage of dogs that enter the prohibited area from the area where dogs are allowed. Thus, for example if dogs regularly enter the SPWPA from adjacent areas where dogs are allowed, resulting in disturbance to the Snowy Plovers, then the area where dogs are prohibited should be expanded to provide a larger buffer to the SPWPA.

Education and enforcement will be crucial to the success of the Dog Management Plan. Dog owners do need to understand that dogs actually disturb wildlife. However, I see little reference to enforcement in the DDMP. While education is preferable to enforcement, that is only true if education results in compliance. My own efforts to inform visitors to the SPWPA that their dogs are supposed to be on leash has not always resulted in compliance.

The education and enforcement efforts will require considerable manpower. For example, at the SPWPA, personnel will need to be regularly present on weekends during the Snowy Plover season to, at first, inform dog owners that dogs are prohibited, and thereafter cite dog owners who do not comply with the prohibition. In my many visits to the SPWPA, I have never seen any NPS personnel, or volunteers who are authorized to engage in outreach to dog owners.

The GGNRA is a unit of the National Park System. Protection of natural resources should be the top priority. Unfortunately, over recent years much of the Presidio, especially the areas near the beaches, has become one giant off-leash dog park. Contrary to the views of the San Francisco Board of Supervisors, I believe that the provision of off-leash dog areas is primarily a local responsibility, and not the responsibility of the National Park Service.

Some dog owners have expressed the view that if the NPS prohibits dog use, then the City of San Francisco should take back the areas the City donated to the GGNRA, because the areas were donated for recreational purposes. (This argument does not apply to the Presidio which was never owned by the City.) However, dog-walking is not the only recreational use that the public makes of the GGNRA lands. Bird-watching is also a recreational activity enjoyed by many, and dogs interfere with bird watching, especially along the beaches. Dogs can be walked in many places, but shorebirds are restricted to beaches (and other wetland areas). Accordingly, it is especially important that sufficient beach areas in the GGNRA be designated as "no dog" areas to provide enough shorebird habitat. This is especially true, as most of the beaches in the area are part of the GGNRA.

Finally, I note the need to establish rules for dogs at areas not covered by the current DDMP, including China Beach and the trails in the interior of the Presidio, although I understand that that may need to wait until the current Dog Management Plan is implemented.

Thank you for your consideration of my views.

Correspondence ID: 3938 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form

Correspondence: My email was incorrect. It is

Correspondence ID: 3939 **Project:** 11759 **Document:** 38106

Received: May,30,2011 13:52:02

Correspondence Type: Web Form

Correspondence: I walk and/or my dog at Crissy Fields most weekends and it makes me really sad to contemplate a time when I can't do that as freely as I can now. As I walked him today at Crissy Field, I became even more sad when I noticed that there are no signs whatsoever in this GGNRA area describing your proposed action to the public. Where is the signage alerting people of your proposal? I felt sorry for all the people who ran by me with their dogs who will never get a chance to comment on your proposal because they don't know about it. The lack of signage made me feel like the Park Service does not care about involving the public in their decisions about public resources.

I urge you to properly sign your proposal in all potentially affected GGNRA areas and extend your comment period to allow park users to weigh in on decisions that will affect them.

Correspondence ID: 3940 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: This DEIS is invalid because it fails to meet its legal obligation to take into consideration the negative effects the proposed changes would create for humans, their dogs and the surrounding environment (e.g. local parks). Further, the studies/science utilized to support allegations of damage to resources in the GGNRA are fatally flawed - the positive impacts are ignored and the negative impacts are unverified. For example, this DEIS omits the Warren study of the snowy plover which concluded recreation of dogs and their owners does not negatively affect the feeding of the plover. Instead the DEIS relies on a study performed by Audubon activists who recommend Draconian restrictions which are unjustified in areas that are not critical habitat. Therefore, I believe the 1979 Pet Policy should be implemented in its original form with no restrictions on off-leash recreation at Ocean Beach, and it should be institutionalized as a Section Seven Special Regulation. Further, I believe that all properties added subsequent to the 1979 Pet Policy and in the future should have historical off-leash recreational usage allowed. This would accurately reflect the enabling legislation for this National Recreation Area which GGNRA management has held in disregard for quite some time. I also believe the GGNRA's inclusion of a Compliance-Based Management Strategy as well as the

GGNRA's failure to commit to a Section Seven Special Regulation following this process indicates a lack of good faith and an intent to deceive the public as the GGNRA did following the implementation of the 1979 Pet Policy which the GGNRA later decried in Federal court as an "error".

Correspondence ID: 3941 **Project:** 11759 **Document:** 38106
Received: May,30,2011 13:58:22
Correspondence Type: Web Form
Correspondence: May 28 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Comments on Draft Dog Management Plan/Environmental Impact Statement

Dear Mr. Dean,

I am writing to request that the Draft Dog Management Plan be modified to make dog use in the GGNRA more, rather than less, accessible. I am concerned about the welfare of dogs and dog owners, particularly the urban population that exists in and around the GGNRA lands.

The reality is that the park lands under discussion are part of an urban community, not a wilderness.

The GGNRA is a unique urban open space, the historical result of lands preserved from residential and commercial development as a result of military use and political will in the Bay Area. It was created to serve the outdoor recreational needs of a large metropolitan area. The current analysis and recommendations fail to consider dogs as part of the urban environment in which the GGNRA was created.

Dogs and dog-walking, both on and off leash, existed in the lands now controlled by the GGNRA before the GGNRA was created.

People and dogs have lived together in urban environments for thousands of years and will continue to do so. It is critical to the emotional and physical health of dogs to be able to exercise fully. This is rarely possible on leash or in small postage stamp sized "dog areas"

If dogs are not given adequate exercise they are prone to more physical health problems. More importantly they often exhibit more behavior problems that affect people. As a veterinarian of 30 years I can tell you that

dogs that need exercise and do not get it are more likely to have aggression related issues, including dog bites. I am concerned that if you do not continue to provide space for dogs to run you will see an increase in the incidence of dog related problems.

The dog policy in the GGNRA has always differed from the policy in other national parks for valid reasons. Dogs should be regarded not as something foreign from which the environment must be protected, but as part of the urban environment which can co-exist in harmony with the other parts of that environment.

Given that people will continue to have dogs, and that these park lands have permitted dogs to run, there is an established expectation that they will continue to do so. Many people made responsible decisions to get dogs while thinking that they had a wonderful place close by to exercise them

It is unfair to punish all responsible dog owners with such severe measures for the problems created by a few dog owners. For example, we do not see similar severe measures being taken against bicyclists for the actions of a few.

Elderly people, special needs people and lower income people are more severely and unfairly punished by these current GGNRA proposals because they will have to travel so far to properly take care of their dogs. They may not be able to do so and may be forced to surrender their beloved companions.

A culture is judged by its wisdom and kindness to the old, the frail and to animals. This harsh proposal reflects poorly on the awareness of the GGNRA. There are more cooperative and community oriented approaches to this problem. A collaborative, educational approach is more humane and balanced.

A multi-use policy is appropriate for the GGNRA, including an adequate balance for dog-friendly and non-dog areas. The vast majority of GGNRA lands are already closed to dogs. The GGNRA should continue to allow a significant portion of its lands for both on-leash and off-leash use. The GGNRA policy should be made more, rather than less, dog friendly and expand dog use areas to allow even more responsible dog ownership enjoyment.

Sincerely yours,

Pamela Bouchard DVM.

ID:

Received: May,30,2011 13:58:35

Correspondence Web Form

Type:

Correspondence: The following are additions to Arnita Bowman's public comment regarding Public Health and Safety Suggestions & Comments mailed on May 28th.

DOGS ENCOURAGE DAILY EXERCISE

The following are excerpt from the New York Times on March 14, 2011 from the article: Forget the Treadmill. Get a Dog. By TARA PARKER-POPE

"You need to walk, and so does your dog," said Rebecca A. Johnson, director of the human-animal interaction research center at the University of Missouri College of Veterinary Medicine. "It's good for both ends of the leash." Several studies now show that dogs can be powerful motivators to get people moving. Not only are dog owners more likely to take regular walks, but new research shows that dog walkers are more active overall than people who don't have dogs.

Researchers from Michigan State University reported that among dog owners who took their pets for regular walks, 60 percent met federal criteria for regular moderate or vigorous exercise. Nearly half of dog walkers exercised an average of 30 minutes a day at least five days a week. By comparison, only about a third of those without dogs got that much regular exercise.

The researchers tracked the exercise habits of 5,900 people in Michigan, including 2,170 who owned dogs. They found that about two-thirds of dog owners took their pets for regular walks, defined as lasting at least 10 minutes.

Unlike other studies of dog ownership and walking, this one also tracked other forms of exercise, seeking to answer what the lead author, Mathew Reeves, called an obvious question: whether dog walking "adds significantly to the amount of exercise you do, or is it simply that it replaces exercise you would have done otherwise?" The answers were encouraging, said Dr. Reeves, an associate professor of epidemiology at Michigan State. The dog walkers had higher overall levels of both moderate and vigorous physical activity than the other subjects, and they were more likely to take part in other leisure-time physical activities like sports and gardening. On average, they exercised about 30 minutes a week more than people who didn't have dogs.

5 WAYS PETS CAN IMPROVE YOUR HEALTH

<http://www.webmd.com/hypertension-high-blood-pressure/features/health-benefits-of-pets> By Jeanie Lerche Davis WebMD Feature Reviewed by Louise Chang, MD

A pet is certainly a great friend. After a difficult day, pet owners quite literally feel the love. In fact, for nearly 25 years, research has shown that living with pets provides certain health benefits. Pets help lower blood pressure and lessen anxiety. They boost our immunity. They can even help you get dates.

Allergy Fighters

"The old thinking was that if your family had a pet, the children were more likely to become allergic to the pet. And if you came from an allergy-prone family, pets should be avoided," says researcher James E. Gern, MD, a pediatrician at the University of Wisconsin-Madison, in the *Journal of Allergy and Clinical Immunology*.

However, a growing number of studies have suggested that kids growing up in a home with "furred animals" -- whether it's a pet cat or dog, or on a farm and exposed to large animals -- will have less risk of allergies and asthma, he tells WebMD. In his recent study, Gern analyzed the blood of babies immediately after birth and one year later. He was looking for evidence of an allergic reaction, immunity changes, and for reactions to bacteria in the environment.

If a dog lived in the home, infants were less likely to show evidence of pet allergies -- 19% vs. 33%. They also were less likely to have eczema, a common allergy skin condition that causes red patches and itching. In addition, they had higher levels of some immune system chemicals -- a sign of stronger immune system activation.

"Dogs are dirty animals, and this suggests that babies who have greater exposure to dirt and allergens have a stronger immune system," Gern says.

Date Magnets

Dogs are great for making love connections. Forget Internet matchmaking -- a dog is a natural conversation starter.

This especially helps ease people out of social isolation or shyness, Nadine Kaslow, PhD, professor of psychiatry and behavioral sciences at Emory University in Atlanta, tells WebMD.

"People ask about breed, they watch the dog's tricks," Kaslow says.

"Sometimes the conversation stays at the 'dog level,' sometimes it becomes a

real social interchange."

Dogs for the Aged

"Studies have shown that Alzheimer's patients have fewer anxious outbursts if there is an animal in the home," says Lynette Hart, PhD, associate professor at the University of California at Davis School of Veterinary Medicine.

"Their caregivers also feel less burdened when there is a pet, particularly if it is a cat, which generally requires less care than a dog," says Hart.

Walking a dog or just caring for a pet -- for elderly people who are able -- can provide exercise and companionship. One insurance company, Midland Life Insurance Company of Columbus, Ohio, asks clients over age 75 if they have a pet as part of their medical screening -- which often helps tip the scales in their favor.

Good for Mind and Soul

Pet owners with AIDS are far less likely to suffer from depression than those without pets. "The benefit is especially pronounced when people are strongly attached to their pets," says researcher Judith Siegel, PhD.

In one study, stockbrokers with high blood pressure who adopted a cat or dog had lower blood pressure readings in stressful situations than did people without pets. People in stress mode get into a "state of dis-ease," in which harmful chemicals like cortisol and norepinephrine can negatively affect the immune system, says Blair Justice, PhD, a psychology professor at the University of Texas School of Public Health and author of *Who Gets Sick: How Beliefs, Moods, and Thoughts Affect Your Health*.

Studies show a link between these chemicals and plaque buildup in arteries, the red flag for heart disease, says Justice.

Like any enjoyable activity, playing with a dog can elevate levels of serotonin and dopamine -- nerve transmitters that are known to have pleasurable and calming properties, he tells WebMD.

"People take drugs like heroin and cocaine to raise serotonin and dopamine, but the healthy way to do it is to pet your dog, or hug your spouse, watch sunsets, or get around something beautiful in nature," says Justice, who recently hiked the Colorado Rockies with his wife and two dogs.

Good for the Heart

Heart attack patients who have pets survive longer than those without, according to several studies. Male pet owners have less sign of heart disease -- lower triglyceride and cholesterol levels -- than non-owners, researchers say.

PEOPLE WITH DOG FEAR OR PHOBIAS

People with a dislike or fear of dogs is not a major or compelling justification for banning or restricting dog recreation. If DEIS presents such arguments, there needs to be peer reviewed, unbiased social research studies completed for the GGNRA to demonstrated that this is a compelling justification and dog recreation has more than a nuisance effect that impedes these people visiting the park. In addition, the Park Service should be alleviating these people's fears instead of unnecessarily intensifying them.

The Sierra Club is misleading our membership that: "Asian and Latino park users report that they are less likely to visit parks for fear of harm from dogs and because of the presence of dog feces." which is offensive and manipulative portrayal by narrowly focused members of the environmental community. The report actually talks about barriers and does not measure the significance of those barriers in any way. It also fails to mention that the discussion groups were skewed towards recent immigrants and to those that have never used the GGNRA. Even I - with a tremendous love of the outdoors, people and dogs ? often mention not liking that a few irresponsible people aren't picking up dog poop but that doesn't mean I won't go because of poop or that it is more than an insignificant nuisance. I also dislike litter, horse poop on the trail, bicycles going too fast, fishing lines obstructing the beach, body odor, bad breath, intimidating park ranger behaviors, trucks on trails, unclean bathrooms, unmaintained trails, no trash cans, poor signage, too many people on the beach, fencing preventing me from going to the pond edge, etc. but that doesn't mean I think we should eliminate other recreational users, park personnel, nor anyone else's ability to go to the park.

Poor transportation and communication, unfamiliarity and different cultural norms, unfriendly park employees and visitors, fear of crime, and overly restrictive rules seemed far more of pervasive an issue than dogs for those in the SFSU study discussion groups. Dog barriers certainly tie in with the general discussions about some individuals' fear of the outdoors and the outdoors being unclean, however, positive exposure to the outdoors and dogs could help overcome those fears with most people. The study also talks about how attitudes change from first generation to subsequent generations which is supported by my recent conversation with a woman that lives steps from Mori Point in Pacifica that just returned from a trip to Thailand where she visited her family. Po (name changed) immigrated to the Bay Area and for some 30 years has loved her daily walks with her moderate sized

shepherd-mix and small terrier rescue dogs, often off-leash, at Mori Point and Sharp Park. Her son, now in US intelligence, grew up going to these parks with their dogs. When her sister visited last year from Thailand, she initially intimidated by the off-leash dogs but Po told her sister to basically "get over it, this is America" and her sister did. From being a PC volunteer in Yemen in the '80s and during my travels in Southeast Asia, I saw many feral dogs on the streets and understand why immigrants, in particular, would initially be afraid of off-leash dogs; just as it is normal to be afraid of almost everything that is so different in America or as I was of many unfamiliar things in Yemen. Po demonstrates that with a little time and positive interactions that dogs really aren't necessarily a long term barrier but are actually an opportunity for all individuals to integrate into our diverse community just like everyone else, particularly since a dogs are such social facilitators in these high visitation parks within neighborhoods along the coast.

Reading the Park Service dog plan has made me seriously think about people with phobias and how dog's impact their experience. Soon after reading the plan, I was trying to keep my balance as I scrambled down a steep, rocky, washed-out fire road deep into Cattle Hill and was thinking "what person that is afraid of dogs would be here". As ranger LaSalle proudly writes in most his \$100 off-leash tickets, Sweeney is a "wildlife haven with big animals" even after a generation after generation of dog recreation. The only people we saw were two young girls pushing mountain bikes up the trail were delighted to take a breather and pet Ella, and a woman with a reactive dog that we easily avoided. The real danger was sliding and ending up in a cast or maybe meeting a mountain lion. Both of which I've done in my life. The dense spring grass was up and, other than the trail, the vegetation looks untouched except for hundreds, if not thousands, of mole hills and wild fur-filled canine poop. Why on earth cram all dog people into a few small areas when remote hiking is so good for the human soul, and the people and dogs have such little impact on the remote areas?

I felt like the European peasants must of felt when they were excluded from the huge royal forests; surely, the park service and their extreme protectionist alias won't turn the more remote areas into their own private preserve. Is this really about dogs or is it about "conservation hoarding" and keeping people off their land? Ranger LaSalle also tells people "this park belongs to the National Park Service." I get that many in the Park Service dislike dogs, and probably that people with dogs as well as others that are using the parks for active recreation and not for their desired conservation or observation. However, discriminating against any person, just because they simply dislike them is not a value that the Bay Area culture embraces nor that the US government should embrace. The DEIS discuss dogs barking impacting the natural soundscapes and the smell of urine. Both seldom

occur and certainly not at a level to severely impede people's visits any more than the sound of children laughing or roughhousing or passing a poorly maintained toilet. I'm in the parks almost daily and seldom hear a dog bark and only smelled urine a few times at Fort Funston after the first rain on the season. When I looked at the Yellowstone winter season general management plan environmental impact studies, the Park Service recognized a potential problem and actually did scientific studies of the noise and fumes from snowmobiles. In this case, the park service is just pulling out everything they can possibly think of to convolute the DEIS and make it difficult for people to understand actual concerns, If the Park Service truly believes Bay Area residents and overall visitorship is severely impacted by any recreational activity, they should go beyond anecdotal evidence, such as my biased stories and most of the biased information in the DEIS, and conduct unbiased scientific social research and environmental research in the GGNRA to determine the real barriers and opportunities and the impact that has on GGNRA visitorship and not simply present misleading and biased survey excerpts and antidotal evidence targeting dogs.

Certainly the SFSU study nor the 2002 population study (questions designed to bias the results) are not substantial enough to draw any conclusions that dogs are a significant barrier for the general Asian or Hispanic/Latino population or any population. When I studied the responses from self-identified Hispanics in the GGNRA 2002 population survey, dog ownership resulted in significantly more days spent in the GGNRA, just like others with dogs. Instead of predominantly white Park Service management and conservation groups pretending to "channel" for the disadvantaged in their efforts to manipulate the public, the Park Service should seriously look at the demographics of people submitting public comments because the GGNRA is important to a diverse group of people with dogs. I'm white but I'm offended when I look around the parks and at the dog rallies and see the diversity that is united by our canine companions. The seniors, children, people with disabilities, and minorities benefit from dog recreation as much, if not more, than others.

Please consider following additions to Arnita Bowman's public comment regarding Environmental Injustice Suggestions & Comments mailed on May 28th.

The Compliance-Based Management Strategy must go.

This poison pill that will allow the GGNRA to change the status of off-leash areas to on-leash or no dogs without additional public comment if there is not 100% compliance with the new restrictions will not work. The change would be permanent. A management plan should not come with a built-in nuclear option, which is what this is. It allows a relatively few bad players to

undermine and destroy a traditional recreational use of the area. No number of responsible dog owners will stop what will become the inexorable removal of all off-leash access in the GGNRA if this strategy remains part of the plan. Tens or hundreds of thousands of hours of incident-free dog walking will not matter. There should be (and are) penalties for bad actors and these should be enforced. But the vast majority of people who do not act badly should not be penalized for the bad actions of a few. This strategy is unfair because off-leash status can be changed in only one direction (toward more restriction). It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined ? by volunteers biased against dogs? by surveillance cameras? ? is not included in the DEIS.

Correspondence ID: 3943 **Project:** 11759 **Document:** 38106

Received: May,30,2011 14:00:38

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I am one of the many dog owners in San Francisco that is saddened and distressed by the GGNRA's draft dog management plan. As you've likely heard already, the vast majority of us are highly responsible animal lovers who simply want a few places in the Bay Area where our canine companions can meet and play with their own kind. San Francisco is so expensive and densely populated that only a lucky few have a living space which has outdoor access, and even those who can afford it rarely have a yard in which our dogs can run freely. To curtail this natural dog activity--indeed, it is a strong need in dogs that must be satisfied for their mental well-being--is nothing less than cruelty to these animals.

Believe me, I understand the importance of protecting and encouraging the existence of the Bay Area's native wildlife. But my understanding is that the studies done to support the GGNRA's proposal have limited probative value when it comes to the actual impact allowing dogs off-leash has on the environment. Unless and until it can be proven that off-leash access is a fundamental cause of wildlife decline, the proposal is simply an attack on easy targets - dogs and their owners.

My dog and I have frequented GGNRA areas since he came into my life 4 years ago, and I strongly believe the most harmful threat to GGNRA area is the extensive littering that riddles our beaches and parks. I religiously clean up after my dog, as do my my friends and acquaintances when it comes to their own dogs. In fact, it's rare to come across an irresponsible dog owner who doesn't, and I fully support ticketing such people. I'm also supportive of

enforcing rules against destructive dogs that are not under voice-control.

However, in my opinion the major culprits putting our parks and shores at risk are people who can't be bothered to throw away their trash in a garbage can that's readily available. Every time I take my dog to the beach I am heartbroken by the plastic bags, cigarettes, cooler fragments, fish hooks and other detritus that riddles our shores. Also seemingly harmful to our environment are scofflaws who ignore park rules and enter off-limit areas, mindlessly tread on plants, wander off marked paths, and allow their children to pick flowers and act aggressively to animals. GGNRA could have a far greater impact on the well-being of the wildlife in our beloved beaches and parks by monitoring and ticketing those offenders. I also take issue with the limitation on areas where dogs are currently allowed but may no longer be able to go, such as Sweeney Ridge. Frankly, there seems little support for the proposition that an on-leash dog on a hiking trail would somehow cause more damage than the far more common humans using the same trail.

Recreational use by humans seems to be a little-considered factor in the GGNRA study and proposal, yet these areas largely exist for human enjoyment, including those of us lucky enough to own dogs. To grossly limit our enjoyment of these areas, with no concrete support for the proposition that well-behaved pets with responsible owners are affecting the areas in a way that destroys them for future generations, is nothing short of discriminatory. Personally, my ability to run with my dog on the beach and hike with him in our parks has increased my well-being and helped me to reach a level of health I've not experienced in 20 years. If GGNRA cares so little about the health and well-being of its constituents, I am sorely tempted to take my dog--and more importantly, my property and income tax dollars--to an area where dog owners and their pets are treated more fairly.

If GGNRA can fully substantiate the contention that environmental harm in GGNRA areas is due solely to responsible dog owners and their pets, I'm happy to consider a compromise that addresses such harm. However, a study that fails to fully consider the impact of humans who litter and ignore park rules, bicyclists, horses, and other animals as potential causes of harm deserves little credit, and to rely upon this study to curtail the rights of responsible dog owners is a slap in the face.

Please consider the rights of **all** Bay Area residents in making this crucial decision about where dogs can access and where they can be off leash.

Best Regards,

Marie Seibel

Correspondence ID: 3944 **Project:** 11759 **Document:** 38106
Received: May,30,2011 14:04:31
Correspondence Type: Web Form
Correspondence: steve gimber kensington, CA 94707

May 27, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Comments on Draft Dog Management Plan/Environmental Impact Statement

Dear Mr. Dean,

I am writing to request that the Draft Dog Management Plan be modified to make dog use in the GGNRA more, rather than less, accessible.

Personal: I have lived in the Bay Area since 1972, mostly in the East Bay, and have made extensive use of GGNRA lands since the inception of the park. I am sixty-nine years old and now retired. I am also a dog owner, spending much of my time with a wonderful ten year old rescue dog, an Australian-Shepherd/Border Collie mix. We do frequent/daily walks, at least ten to twenty hours weekly. While I still live in the East Bay, I continue to make extensive use of GGNRA lands, especially in Marin County. Walking is an essential part of both my dog's health and my own. Off-leash exercise is critical to my dog's health and happiness.

The Draft Proposal: I read the GGNRA analysis in the Draft Dog Management Plan with interest and concern. I believe the fundamental flaw in the analysis is the failure to consider dogs as part of the urban environment in which the GGNRA was created. The GGNRA was never a pristine natural environment such as that found in Yosemite, Glacier, or Capitol Reef National Parks - all of which I love and enjoy. The GGNRA is a unique urban open space, the historical product of lands preserved from residential and commercial development as a result of military use and political will in the Bay Area. It was created to serve the outdoor recreational needs of a large metropolitan area and contains a significant portion - and some of the best - of the open space in the Bay Area. There are valid reasons why the dog policy in the GGNRA has always differed from the policy in other national parks. Dogs and dog-walking, both on and off leash, existed in the lands now controlled by the GGNRA before the GGNRA was created. Dogs should be regarded not as something foreign from which the environment must be protected, but as part of the urban environment which can co-exist in harmony with the the other parts of that

environment.

Recommendations for more extensive dog use: A multi-use policy is appropriate for the GGNRA, including an adequate balance of dog-friendly and non-dog areas. The vast majority of GGNRA lands are already closed to dogs. The GGNRA should continue to allow a significant portion of its lands for both on-leash and off-leash use. In fact, I believe that the GGNRA policy should be made more, rather than less, dog friendly. Because of its unique position as the primary open space provider in the magnificent Bay Area, the GGNRA would do well to expand dog use areas to allow even more responsible dog ownership enjoyment.

Sincerely yours,

steve gimber

Correspondence ID: 3945 **Project:** 11759 **Document:** 38106

Received: May,30,2011 14:05:36

Correspondence Type: Web Form

Correspondence: GENERAL PUBLIC COMMENT & SUGGESTIONS

For me personally, it has been on a long, up and down, exhausting journey since seeing an article in January about the pending GGNRA dog management plan and environmental impact study (DEIS). During my journey and after reviewing the plan and visiting most of the parks, I've become an activist on the GGNRA trails and Bay Area dog groups and heard or read hundreds of inspiring personal stories and comments on the GGNRA. This one is universal and expresses my own feelings, better than I could, as a transplant from rural Oklahoma and much of why I continue to live in the Bay Area and am so intensely dedicated to opposing this attempt to marginalize "recreation" in the GGNRA:

"I go to the beach more than I go to parks. Going to the beach is more or less the same as going to the parks for me. The ocean is also a form of nature. When I look at the ocean, I could totally relax and let my imagination run wild. I feel that life in America is truly wonderful when I watch people fishing, jogging, playing and walking their dogs. Sometimes, I would even call my parents in China to tell them that I was at the beach and they could even hear the waves! I lived near the beach in Tsingtao when I was in China, and thus, I was especially happy when I ended up living near the beach here in America." [Chinese female, 44 years old, recent immigrant, San Francisco resident]

Ironically, I found this quote when looking at the SFSU (Roberts 2007) study <http://wildequity.org/images/4856> that, like other literature, the SF Bay Area Sierra

Club spokes people and the DEIS (page 31) are taking out of context to help justify eliminating dogs.

SUGGESTIONS

- 1) Abandon this extreme draft dog management plan including the 75% compliance rule
- 2) Honor the legislative mandate for the GGNRA which is for a National Recreation Area for a large urban population (aka, "maintenance of needed recreational open space necessary to urban environment and planning"). The mandate was never to provide a "National Park caliber experience".
- 3) Recognize dog recreation as a valid and safe recreational activity that should be supported by our National Parks and the GGNRA and reform the Park Service regulations acknowledging such
- 4) Before publishing the revised Dog Management Plan, complete and publish the GGNRA Foundation Statement and the GGNRA General Management Plan to provide full disclosure of the Park Services' understanding and intent for the GGNRA and to allow for meaningful communication to the public about the full extent of the GGNRA's plans for recreation.
- 5) Provide the public with the data supporting conclusions instead of just statements without support (e.g., increased off-leash dogs and chasing events). The public should be able to trust that the Park Service is using reasonable standards and not just be the promotion of a hidden agenda; and reasonable standards should stand up to reasonable scrutiny. Data should be presented even if it does not support the Park Services' agenda.
- 6) Fully disclosed the significance of the GGNRA protected species population to the recovery of the species and only reduce recreation if the recreation is proven to significantly impact the recovery of the species and other less extreme management changes are not available.
- 7) Monitor Park Service performance related to maintaining the recreation values using accurate visitation determination methods and unbiased visitor and population surveys. The current methodology seems to ignore many sites and only monitor a few entrance points and based on estimates from the 2002 Population Survey is significantly understating yearly local visitation.
- 8) Re-evaluate the current leash requirement closures and planned "Natural" area designations based on the recreation value of Ocean Beach and Crissy Field in comparison to the significance of these areas to the recovery of the Western Snowy Plover and the regional maintenance of other birds and wildlife, the actual evidence of impacts from dog recreation on the plover, the evaluation of other suitable protection options (e.g., education, signage, barriers, etc.).
- 9) Complete a comprehensive study of the recreational value of dog recreation (e.g. health, safety, culture, relaxation, etc.)
- 10) Conduct scientific studies to determine the actual impacts of dog recreation on the natural environment (e.g., effect of habituation, actual interactions and intensity, impact on individual and population viability, severity of dog trampling damages on vegetation and soil, impact of education/signage/barriers on human's management of dog, etc.).
- 11) Remove speculative, exaggerated, misleading, and anecdotal statements from the revised draft and rely on reasonable scientific studies of the actual incremental impacts from dog recreation that are not already attributable to other activities.
- 12) Define

an assessment methodology for evaluating impacts that relies on objective standards that consider both likelihood and potential severity and are not purely subjective standards. These standards should equally apply to other recreational activities and minimize the use of personal biases and hidden agendas. 13) Encourage people to get daily exercise with their dogs and to socialize their dogs (e.g., education and training programs, social events and activities, park services, etc.). 14) Justification for any reduction of recreation to be based on creditable evidence and justifications that is specific to each GGNRA park unit and that considers the recreational needs of people, including people with dogs. 15) Revise the DEIS justification to only use primary impacts and benefits instead of imply that all issues are significant. 16) Determine whether additional service (e.g., food service, training programs/areas, showers, etc.) would contribute to the recreational value at Ocean Beach and Fort Funston. Consider whether minimal park usages fees are appropriate as in other areas managed by the Park Service. 17) Re-evaluate the suggested alternatives dismissed from consideration and consider feedback from the public comment that requests that recreation is the mandate of the GGNRA and some impacts are acceptable to achieve that mandate. 18) Reject the ROLA plan in favor of the existing voice-control requirements supplemented by awareness programs. 19) Establish sound professional dog walking rules and regulations that enable safe but reasonable options for the community. 20) Implement programs to control poison oak and fox tails, particularly in crowded, high use parks; solicit assistance from concerned dog groups.

HONOR THE MANDATE OF THE GGNRA ENABLING LEGISLATION

The enabling legislation opening paragraph is:

"In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the recreation area, the Secretary of the Interior (hereinafter referred to as the "Secretary") shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area."

After some 40 years, the GGNRA park land is beautiful and diverse and the Park Service has not provided nor attempted to provide any scientific evidence that indicates dog recreation will have a significant impact on future generations' ability to enjoy the park as we do or on the natural environment. The main risk to our Recreation Area is that the Park Service will be successful in marginalizing recreation in the GGNRA and deprive over 3 million people of needed open space

for exercise and relaxation (aka recreation). The Park Service is diluting the recreational mandate as presented in the 2008 draft of a Foundation Statement that has not been enacted by the GGNRA but is being presented in the media as the purpose of the GGNRA instead of the actual enabling legislation mandate. The Draft Foundation Statement Purpose and what has been presented to the media is:

"The purpose of Golden Gate National Recreation Area is to offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic, and recreational values." In the subsequent description of the Park Significance, there is no mention of providing the core value of the enabling legislation which is to provide "open space needed for an urban environment and planning" nor a mention of "recreation" at all. The Park Service continually attempts to imply that "recreation" should be constrained in the Foundation Statement document with statements like: "The enabling legislation establishing the park - recognizing that heavy use could impair its "outstanding natural, historic, scenic and recreational values," - reconfirmed the mandate of the Organic Act: "In the management of the recreation area, the Secretary of the Interior shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management."

In contrast, the NPS policies state:

"Virtually every form of human activity that takes place within a park has some degree of effect on park resources or values, but that does not mean the impact is unacceptable or that a particular use must be disallowed. Therefore, for the purposes of these policies, unacceptable impacts are impacts that, individually or cumulatively, would be inconsistent with a park's purposes or values."

At the time the GGNRA was established, it was included in the National Park Service but was not a "National Park" nor was their claims of being a "National Park". If the National Park Service cannot accept the "recreation" mandate, I believe the President should consider transferring the GGNRA to an organization that can fulfill the park mandate and work with our urban community to preserve the recreational and environmental value of this "National Recreation Area".

The Foundation Statement is quite significant and any changes to park values should be agreed to before presenting these to the media or adopting them in more operational management plans such as the dog management plan. Per the NPS Policies 2006, the planning process should begin with the development of a foundation statement that is based on the park's enabling legislation or presidential proclamation and that documents the park purpose, significance, fundamental resources and values, and primary interpretive themes. The foundation statement is generally developed (or reviewed and expanded or revised, if appropriate) early, as part of the public and agency scoping and data collection for the general

management plan (GMP).

The Foundation Statement indicates that "We are dedicated to ongoing, dynamic conversations with the communities we serve. We will provide opportunities for meaningful involvement to promote better understanding and communication, discuss concerns, and express values and preferences when park decisions and policies are being developed and implemented." The Park Service has lived up to this value by soliciting feedback and listening; however, once the park service "listen" they virtually ignore the feedback of the mass majority as they have done with dog recreation. The Park Service management seems to have determined that the primary mandate of the GGNRA should be protected species propagations and any activity that impedes that goal should be politely eliminated even if they need to use misleading and unfair tactics to achieve their goals.

Instead, the Park Service is using misleading and unfair tactics to marginalize a subgroup that gets tremendous health and community benefits from the "Park of the People" and seems to be the most vocal advocates for recreation. I'm offended at how the dog community has been treated as a nuisance that doesn't even require scientific studies showing real impacts on others or the environment or attempting other management alternatives before the Park Service proposes such dramatic cuts.

It is unfortunately that the Park Service is forcing us non-political people to organize and to express how important these open spaces are for our diverse community's health and well-being. I'm a dedicated environmentalist and would never have expected to become so alienated from the Park Service or conservation groups. In my opinion, people like my family and other GGNRA regulars should be the spokespeople for the NPS Healthy Parks Healthy People campaign with our long walks in the GGNRA almost every day with our well-trained and behaved dog; instead it so bizarre that the Park Service is trying to ban responsible people like us from the GGNRA.

CONSERVATION VS PUBLIC RECREATION PRESERVATION

I've become super sensitized over the last few months to how our coastal recreation areas are so vital to making Bay Area people healthier and happier and safer and how the Park Service and local conservation groups are high-jacking open spaces that Congress mandated for "recreation areas". It is a significant concern that Ocean Beach parking lot traffic dropped 50% from 1996 (1.3 million) to 2010 (630,000) without any apparent justification, other than suppressive Park Service policies and lack of any services. Note that the Bay Area population increased by 4.7% from 2000 to 2010 per the US Census Reports. Fort Funston traffic counts, in contrast, increased by 20% from 1996 to 2010. The Park Service only uses visitation projections based on traffic counts so perhaps people are using different transportation methods today but the Park Service's lack of a methodology or concern for changes in visitation is also a concern; as well as that fact that

visitation is not monitored at many locations, and it doesn't seem visitation and user satisfaction is a key performance indicator. For my FOIA request for visitation surveys, the Park Service couldn't provide a single visitor survey, other than the survey designed to justify banning dog recreation.

Instead of sharing recreation in these areas, these "conservation hobbyist" are completely focused on their recreational hobby of changing the existing environment with natural plant restoration projects and creating new zoo-sized enclosures in city parks that highlight "protected species" which then gives them the license to turn park beautification projects into "conservation hoarding" as has been done at Ocean Beach and Crissy Field. The Park Service seems to now be preemptively extending the "conservation hoarding" strategy to the entire 80,000 acres and dramatically changing the mandate of the GGNRA without real public comment. The 2008 Draft GGNRA Foundation Statement, the Draft GGNRA General Management Plan, and the 2011 Draft GGNRA Dog Management Plan all highlight that the Park Service is marginalizing the recreation mandate of the GGNRA with little regard for the people. It is highly concerning that the Park Service issued a preliminary GMP in 2008 and received public comment and has not published the GMP three years later but is proceeding with this dog management plan without establishing and publishing the foundation. It is also concerned that as part of my FOIA request, they refused to provide the current draft of the GMP as required by law, which impeded my ability to raise awareness about the systemic marginalization of all recreation other than "stewardship".

The Park Service and these groups have shrewdly been hiding behind the words "protected species" because it seems even a whisper of the word, and the public and politicians are afraid to scrutinize their actions. The Park Service has also wisely omitted from the DEIS any recognition of whether an area is a critical habitat deemed by the US Fish & Game to be critical for the recovery of a species. Particularly with the Western Snowy Plover, it is not a critical habitat, and I doubt whether plovers resting in the narrow dunes is even conducive to the population's health and well-being with or without minor disturbances from recreation. There are bird sanctuaries nearby that are far larger and more suited to their needs; in fact, the bird sanctuaries in the East Bay are even larger than our 80,000 acre National Recreation Area and the undeveloped areas are miles wide instead of meters wide. Both Ocean Beach and Crissy Field are just narrow dune strips bordering on traffic or congested tourist pathways and any plovers in those dunes must be relatively habituated to human activity far more than plovers in remote areas.

Real conservation is important and so is public health and safety. The Park Service new Healthy Parks Healthy People motto is right on the money but needs to be more than a feel good motto. In 1972 in the GGNRA enabling legislation, Congress wisely recognized this need with "in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning" and "shall utilize the resources in a manner which will provide for recreation and

educational opportunities consistent with sound principles of land use planning and management". Just as it would be poor judgment for the Park Service to reintroduce the native grizzly to urban parks because of the public health and safety risks; it is poor judgment to allow non-critical habitats and in some cases just "suitable habitats" for native and non-native "protected species" to be a justification for driving people out of an urban recreation area, which has been done at Ocean Beach and Crissy Field, and is now planned for the rest of our urban recreation area.

Even without harassment, it is reasonable to believe that wildlife is being displaced from any relatively small urban park with high visitation with or without dogs. It is OK. The problem is the Park Service is not demonstrating an understanding of the health and cultural role of recreational open space necessary to urban environment and planning. Preserving open space for recreation is as important if not more so than maintaining other National Park Service areas that don't support wildlife such as the Presidio golf courses, parade ground, sports fields, buildings, campgrounds, etc. Not every space needs to be focused on conservation, and there is no justification to marginalize recreation on virtually all of San Francisco's coast leaving San Francisco land-locked and people hostage to the US government; just because the Park Service doesn't want to be in the recreation business. There is no more of a real conservation reason to turn Ocean Beach from a recreation area into a "Natural" area than turning Golden Gate Park entirely into a Buffalo or a Grizzly Bear habitat with guided tours and stewardship programs to maintain the area.

What is most disturbing is the Park Service has not studied or at least is not providing any studies of the impact of dogs on any wildlife or protected species in our urban National Recreation Area, except the Western Snowy Plover and a minor study at Fort Funston. I expect this is because the impacts would not be measurable or would be insignificant, particularly in comparison to other human recreation or park activities. In 2007, the Park Service justified re-closing the Western Snowy Plover beach areas to voice-controlled dogs after reviewing their internal monitoring that they claim showed increased off-leash dogs and chasing incidents. Just as with the DEIS, they did not provide any measurement of the degree of disturbances to justify the closures, and I suspect in reality this highly secretive monitoring was merely some minor anecdotal evidence. According to Suzanne Valente, the Park Service refused to support their claims with evidence and to release the supporting data even with her Freedom of Information Act (FOIA) request. In reviewing the 2007 to 2008 ranger/park police incident details for Ocean Beach, I only found four incidents of rangers or park police seeing dogs disturbing Western Snowy Plovers even though they wrote up case reports with more than 400 off-leash dog owner contacts and likely saw many more off-leash dogs that they didn't pursue or report. I expect, however, that the rangers/park police would have interrupted and cited any actual disturbances of the plovers by dogs, particularly considering the Park Service's objective of excluding people with dogs.

Most dogs, walkers, joggers, fishermen and others are on the beach and it is likely that the resting plovers have habituated to their routine, non-eventful presence. I've walked the Ocean Beach Snowy Plover Protection Area (SPPA) beaches three times since January and have only seen people ocean-gazing in the dunes. When I asked the rangers at the DEIS open house about why the Park Service was not stopping people from being in the dunes (e.g., barriers), the response was it wasn't critical enough because it wasn't a critical habitat for the Western Snowy Plover. They also mentioned that the beach erosion was likely the major cause for the decline in Western Snowy Plovers at Ocean Beach. I'm still confused that the Western Snowy Plover population was at its highest in 1994 before the Park Service started trying to protect them (e.g., before banning dogs and when overall visitation may have been twice as high as today). Wouldn't it be bizarre if more people is actually a deterrent to the ravens and sea gulls that prey on plovers and recreation is actually beneficial to the plover in the SPPA.

The Park Service have conducted and released results for a biased study at Crissy Field designed to show even miniscule dog impacts and only showed that dogs on-leash or off-leash cause few disturbances. Walkers and joggers caused 79% of the 14 "disturbances" in this popular beach recreation area that is a major destination for tourists. The Park Service has completely ignored unbiased plover studies in the GGNRA, such as the Warren study from the University of Berkeley, that showed no significant impact on the Western Snowy Plover feeding time from recreation users, including dogs. The Park Service again ignores monitoring data showing declines in plover populations from the 2008/2009 to the 2009/2010 season despite reductions in recreation. Most disturbingly, the park service is so focused on proving recreation is a significant impediment that it is ignoring other disturbances which are likely more significant such as those by the plover's natural predators such as sea gulls, ravens, and wild canines. That being said, I believe the Park Service should focus on more holistic monitoring of the health of the entire eco-system including that of all wildlife and humans that rely on the health of these parks.

As a nature lover, one of the greatest joys of being in the GGNRA is experiencing the rich beauty of the nature that surrounds us; I want nature preserved but recognized that adding dog recreation has a negligible impact on existing nature in the parks other than encouraging more visitorship, and the existing wildlife has long adapted to our recreational use in these parks. Currently, dog off-leash play type areas are less than 1% of the GGNRA park lands and on-leash/off-leash dogs on trails probably impact less the 1% of the remaining park land. Just because the Park Service and some conservationists want to dedicate the parks to conservations and solitary experiences is not a justification for high-jacking our recreation area and unnecessarily impeding the intended urban recreation.

A major concern with the DEIS is the use of exaggerated, misleading and speculative language; particularly in regards to protected species. The following

are examples of these extreme biases need to be removed from all sections:

1) The DEIS claims that dogs have accessed the bluff above where Bank Swallows nest in sheer cliff faces near top; pet rescues have occurred over cliff, which may disturb the colony during breeding season when personnel reel down. There is no evidence of dogs and or humans digging at or collapsing the burrows, flushing birds from nests, and causing active sloughing and landslides that may block or crush burrows with the young inside. Dogs cannot reach birds from bluff; cliff rescues are rare no documentation that dogs or humans contribute to any other factors that may affect birds

2) The DEIS claims dogs could damage Mission Blue Butterfly habitat in the trail beds and adjacent to the trails/roads; protective fencing for habitat does not exclude noncompliant dogs. However, there are no known studies measuring the impact of dogs on the habitat. The rangers did not document any cases of dogs in or damaging the restoration areas

3) The DEIS claims dogs could gain access to closed lagoon for the Tidewater goby (fish), dogs along the shoreline could crush goby burrows, cause increased turbidity. While individuals would be affected neither the population and gene pool would not be affected, and there are no known studies measuring the impact of dogs on the habitat. The ranger narratives only documented one case with two dogs briefly swimming in the Rodeo Lagoon during 2007 and 2008.

4) The DEIS claims dogs can cause California red-legged frog (amphibian) eggs, juveniles, and adult life stages to be affected by trampling and suffocation by sediments coating the eggs and behavioral disturbance or causing injury or mortality to individuals. There are no known studies measuring the impact of dogs on the habitat.

Other points to consider include:

Dogs have little negative impact on the natural resources and do not pose a significant threat, if any at all, to the survival of protected species, or other wildlife, in the Golden Gate National Recreation Area. Similarly, they are not a major safety threat in parks, where the significant amount of serious incidents that are reported to rangers and law enforcement involve people, not dogs. Protected Species: The GGNRA Draft Dog management/Environmental Impact Statement plan (DEIS) has information about 17 protected species listed as federally or state endangered or threatened. There is practically no documentation that demonstrates dogs impede population growth of these species or cause significant detrimental impacts on them within the GGNRA. In fact, the DEIS frequently advances hypothetical situations that posit what possibly could occur to species and habitat with specious conclusions (See species chart).

Critical habitat: Loss of critical habitat is the primary threat to most imperiled

species. Four species referenced in the GGNRA DEIS (Tidewater goby, Coho salmon, Steelhead trout, and California red-legged frog) are found in areas of the GGNRA considered to be critical habitat. However, the DEIS provides no data that demonstrate irreparable damage has been inflicted on the species or its respective habitats by dog (or human) which on rare occasion has been observed in a creek that is closed. While it's normal for populations to fluctuate, Coho salmon is the only species among this group that has experienced a recent decline, which is attributed to a regional oceanic phenomenon.

Western Snowy Plover: The Western Snowy Plover is the snowy plover that lives within 50 miles of the Pacific coast from Washington to Baja California and is listed as threatened under the Endangered Species Act. Snowy Plovers do not migrate and live throughout the United States, and the Western Snowy Plover is not genetically different from other snowy plovers populations that are not on the protected list. http://fresc.usgs.gov/research/StudyDetail.asp?Study_ID=425 Breeding sites such as the South San Francisco Bay Bird Observatory (non-GGNRA) with 30,000 acre in Milpitas has 275 breeding adults and is one of 11 California breeding habitats with more than 40 plovers during the breeding season . See http://science.nature.nps.gov/im/units/sfan/vital_signs/snowy_plover/docs/GOGA_Plover%20Monitoring%20Brief.pdf AND http://www.fws.gov/arcata/es/birds/wsp/documents/siteReports/California/RU3_S NPL_Report_2010.pdf

The snowy plovers do not nest or breed in the GGNRA but some do at times rest and forage at the two most popular and crowded San Francisco city beaches, units of the GGNRA. In the 2009/2010 season, the Audubon Society's 20 hour study of the birds showed up to 166 people in one hour period at Crissy Field and on average 1.55 plovers. See <http://www.fws.gov/arcata/es/birds/wsp/plover.html>. Other GGNRA studies show Ocean Beach has an average of 27 plovers resting and feeding in the dunes but don't show human usage at this popular beach.

Less than 2% of the California population of Western Snowy Plovers sometimes forage at these city beaches, and there is no evidence that resting and foraging in the limited dunes in these dense urban areas is critical and is perhaps not even beneficial to the species or to the Western Snowy Plover population or the Pacific coastal eco-systems. These preservation efforts may also cause some harm as, the GGNRA posts requirements for all walkers, joggers, and other recreational users to stay near the waterline away from the dunes in the Snowy Plover protection areas (http://www.nps.gov/goga/planyourvisit/upload/sb-plight_web.pdf), which forces unnecessary feeding disturbances for almost all of other shorebirds, including some other protected shorebirds, using the beach for wintering or during migration. Beach erosion and lack of dune acreage seems to be the most significant factor that deters the plover at Ocean Beach. Plovers are impacted less by dogs than by motorized park patrols, construction, walkers, beach-goers, joggers, surfers, equestrians, and natural predators. In fact, in the Crissy Field study (20 hours),

only 1 off-leash dog (1 for 40 off-leash) even remotely disturbed the plovers in comparison to 11 disturbances by people (11 for 298 people). On-leash dogs (2 for 18 on-leash) also caused more disturbances than the larger number of off-leash dogs. There are no reports of a dog ever injuring or killing a plover in the GGNRA. The significant disturbance during 2010 season was the building of the Crissy Field WPA fence that resulted in the plovers leaving for the season.

ERRONEOUS JUSTIFICATION BASED ON PEOPLE THAT FEAR OR SIMPLY DISLIKE DOGS

People with a dislike or fear of dogs is not a major or compelling justification for banning or restricting dog recreation. If DEIS presents such arguments, there needs to be peer reviewed, unbiased social research studies completed for the GGNRA to demonstrated that this is a compelling justification and dog recreation has more than a nuisance effect that impedes these people visiting the park. The Sierra Club is misleading our membership that: "Asian and Latino park users report that they are less likely to visit parks for fear of harm from dogs and because of the presence of dog feces." which is offensive and manipulative portrayal by narrowly focused members of the environmental community. The report actually talks about barriers and does not measure the significance of those barriers in any way. It also fails to mention that the discussion groups were skewed towards recent immigrants and to those that have never used the GGNRA. Even I - with a tremendous love of the outdoors, people and dogs ? often mention not liking that a few irresponsible people aren't picking up dog poop but that doesn't mean I won't go because of poop or that it is more than an insignificant nuisance. I also dislike litter, horse poop on the trail, bicycles going too fast, fishing lines obstructing the beach, body odor, bad breath, intimidating park ranger behaviors, trucks on trails, unclean bathrooms, unmaintained trails, no trash cans, poor signage, too many people on the beach, fencing preventing me from going to the pond edge, etc. but that doesn't mean I think we should eliminate other recreational users, park personnel, nor anyone else's ability to go to the park.

Poor transportation and communication, unfamiliarity and different cultural norms, unfriendly park employees and visitors, fear of crime, and overly restrictive rules seemed far more of pervasive an issue than dogs for those in the SFSU study discussion groups. Dog barriers certainly tie in with the general discussions about some individuals' fear of the outdoors and the outdoors being unclean, however, positive exposure to the outdoors and dogs could help overcome those fears with most people. The study also talks about how attitudes change from first generation to subsequent generations which is supported by my recent conversation with a woman that lives steps from Mori Point in Pacifica that just returned from a trip to Thailand where she visited her family. Po (name changed) immigrated to the Bay Area and for some 30 years has loved her daily walks with her moderate sized shepherd-mix and small terrier rescue dogs, often off-leash, at Mori Point and Sharp Park. Her son, now in US intelligence, grew up going to these parks with their dogs. When her sister visited last year from Thailand, she initially intimidated

by the off-leash dogs but Po told her sister to basically "get over it, this is America" and her sister did. From being a PC volunteer in Yemen in the '80s and during my travels in Southeast Asia, I saw many feral dogs on the streets and understand why immigrants, in particular, would initially be afraid of off-leash dogs; just as it is normal to be afraid of almost everything that is so different in America or as I was of many unfamiliar things in Yemen. Po demonstrates that with a little time and positive interactions that dogs really aren't necessarily a long term barrier but are actually an opportunity for all individuals to integrate into our diverse community just like everyone else, particularly since a dogs are such social facilitators in these high visitation parks within neighborhoods along the coast. Reading the Park Service dog plan has made me seriously think about people with phobias and how dog's impact their experience. Soon after reading the plan, I was trying to keep my balance as I scrambled down a steep, rocky, washed-out fire road deep into Cattle Hill and was thinking "what person that is afraid of dogs would be here". As ranger LaSalle proudly writes in most his \$100 off-leash tickets, Sweeney is a "wildlife haven with big animals" even after a generation after generation of dog recreation. The only people we saw were two young girls pushing mountain bikes up the trail were delighted to take a breather and pet Ella, and a woman with a reactive dog that we easily avoided. The real danger was sliding and ending up in a cast or maybe meeting a mountain lion. Both of which I've done in my life. The dense spring grass was up and, other than the trail, the vegetation looks untouched except for hundreds, if not thousands, of mole hills and wild fur-filled canine poop. Why on earth cram all dog people into a few small areas when remote hiking is so good for the human soul, and the people and dogs have such little impact on the remote areas?

I felt like the European peasants must of felt when they were excluded from the huge royal forests; surely, the park service and their extreme protectionist alias won't turn the more remote areas into their own private preserve. Is this really about dogs or is it about "conservation hoarding" and keeping people off their land? Ranger LaSalle also tells people "this park belongs to the National Park Service." I get that many in the Park Service dislike dogs, and probably that people with dogs as well as others that are using the parks for active recreation and not for their desired conservation or observation. However, discriminating against any person, just because they simply dislike them is not a value that the Bay Area culture embraces nor that the US government should embrace.

The DEIS discuss dogs barking impacting the natural soundscapes and the smell of urine. Both seldom occur and certainly not at a level to severely impede people's visits any more than the sound of children laughing or roughhousing or passing a poorly maintained toilet. I'm in the parks almost daily and seldom hear a dog bark and only smelled urine a few times at Fort Funston after the first rain on the season. When I looked at the Yellowstone winter season general management plan environmental impact studies, the Park Service recognized a potential problem and actually did scientific studies of the noise and fumes from snowmobiles. In this case, the park service is just pulling out everything they can possibly think of to

convolute the DEIS and make it difficult for people to understand actual concerns, If the Park Service truly believes Bay Area residents and overall visitorship is severely impacted by any recreational activity, they should go beyond anecdotal evidence, such as my biased stories and most of the biased information in the DEIS, and conduct unbiased scientific social research and environmental research in the GGNRA to determine the real barriers and opportunities and the impact that has on GGNRA visitorship and not simply present misleading and biased survey excerpts and antidotal evidence targeting dogs.

Certainly the SFSU study nor the 2002 population study (questions designed to bias the results) are not substantial enough to draw any conclusions that dogs are a significant barrier for the general Asian or Hispanic/Latino population or any population. When I studied the responses from self-identified Hispanics in the GGNRA 2002 population survey, dog ownership resulted in significantly more days spent in the GGNRA, just like others with dogs. Instead of predominantly white Park Service management and conservation groups pretending to "channel" for the disadvantaged in their efforts to manipulate the public, the Park Service should seriously look at the demographics of people submitting public comments because the GGNRA is important to a diverse group of people with dogs. I'm white but I'm offended when I look around the parks and at the dog rallies and see the diversity that is united by our canine companions. The seniors, children, people with disabilities, and minorities benefit from dog recreation as much, if not more, than others.

IMPACTS OF ADJACENT LANDS

I worry when I look at a map of the Bay Area and all the closures of parks to people with dogs and particularly about Stern Grove and McLaren. Neither will easily support the current Fort Funston visitation or the visitation caused by the increased leash enforcement in San Mateo County. Both suddenly will become more desirable than the new, tiny Fort Funston off-leash area. People with dogs are being discriminated against in more and more Northern California city, county, state, and national parks, which only concentrates any problems. Closing parks to people with dogs must stop. While the NPS has represented that dogs are a safety risk in the GGNRA, the actual law enforcement data actually shows that the GGNRA dogs are well behaved considering the high usage by people with dogs, and there are only a few incidents that rise above nuisance type problems. In comparison to other recreational activities, dog recreation is safe and gets people out in the parks on a daily basis while creating safe dogs for the community.

UNSUSTAINABLE IMPACT CLAIMS

The NPS is discriminating against people with dogs by not recognizing dog recreation as a high use recreational activity for the GGNRA. The NPS represents that the current dog management plan is unsustainable. After reviewing the DEIS, visiting all but 3 of the park units, reviewing the law enforcement data, and the

Western Snowy Plover research; the only unsustainable aspect of the current GGNRA dog management plan is the self-inflicted NPS conflict with the people with dogs over leash laws and areas closed to pets. Instead of addressing that problem, the DEIS plan will only exacerbate these problems within the GGNRA and adjacent lands.

ROLE MODEL FOR OTHER OPEN SPACES

The existing San Francisco model should be the role model for other communities on how to integrate dogs for a healthy and vibrant community. On the whole, the GGNRA dogs are well exercised, socialized, and trained, and dog owners are responsibly managing their dogs. While some unfortunate incidents do occur, those incidents are rare and only a few are more than nuisance type incidents. Dogs inspire people to lead healthier lives and to interact on a daily basis with the community. While some people dislike or are afraid of dogs, there are many parks that don't allow dogs or require the dogs to be on leash. There will always be people that dislike others for whatever reason; however, suppressing dog recreation, particularly off-leash, will only lead to more dogs and people not being socialized to each other and increasing the number of dogs and people with fears.

Correspondence ID: 3946 **Project:** 11759 **Document:** 38106

Received: May,30,2011 14:09:44

Correspondence Type: Web Form

Correspondence: I support Alternative D. I live near Ocean Beach and have seen too many incidents of dog fights, uncollected dog excrement, children being knocked over, and dogs running through people's picnics. Although I know that there are many responsible dog owners, they are not willing or able to police the irresponsible dog owners. I also think that many dog owners overestimate their ability to control their dogs with vocal commands. I routinely see owners with off-leash dogs that do not appear to be under voice control, even when it is clear that their dogs are bothering others. Letting dogs run off-leash is a privilege not a right and this privilege has been abused.

Correspondence ID: 3947 **Project:** 11759 **Document:** 38106

Received: May,30,2011 14:12:08

Correspondence Type: Web Form

Correspondence: I think GGNRA accusations of canine erosion of Fort Funston is a mask.GGNRA has not maintained Fort Funston.The roads are in need of repairs.The benches are in bad shape.There is no place to have a picnic lunch(a table under the trees in bad shape).GGNRA should explain how the funds are spent.I also think Frank Dean should be replaced asap.Under his administration Fort Funston has deteriorated. When Pres Nixon created

GGNRA,the Federal Government saw a need to protect these urban recreation areas from commercial development for the locals to enjoy.A role the Feds should play.Almost 40 yrs later,the Feds say,we know best.We don`t listen to locals.We will tell you what is legal.An obvious over use of power ignoring the original intent of creating GGNRA. The excuses we hear all the time from Rangers,I have a dog.Frank Dean has a dog Ranger.I feel sorry for these dogs who never get a chance to run loose and meet other dogs. If the GGNRA insists on new rules,SF should take back Funston/Crissy.The GGNRA would not be able to enforce the new rules pending litigation thru the courts.

Correspondence ID: 3948 **Project:** 11759 **Document:** 38106
Received: May,30,2011 14:16:04
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean,

I understand the GGNRA would like to further limit the few areas in San Francisco where my dog can roam freely and play with other dogs. Indeed, it seems like the new plan also cuts down on the areas my dog can be. This plan should not be implemented for a number of reasons, including the following:

- (1) dog owners and their pets are already the easy scapegoats of plans which have grossly limited the parks where dogs can be, both on and off leash;
- (2) the study which forms the basis for the plan, from what I can tell, does not fully demonstrate that dogs are the cause of any significant environmental impact;
- (3) the study does not consider the effects of the proposed plan on responsible dog owners, who have a right to enjoy our parks with their close companions -- what happened to the enjoyment of the parks by residents, and our health and well-being that comes from being able to exercise with our pets?;
- (4) the plan does not consider a strategy whereby only dogs that could even remotely be considered a problem - i.e., those that are overly aggressive and not under their owners' control - are limited in their use of GGNRA areas; and
- (5) the study doesn't fully consider other possible sources of harm to the environment, such as bicyclists and people who break park rules with little regard for the environmental impact of their actions.

I am one of many extremely responsible dog owners who are offended by

the proposed plan, and honestly believe that curtailing the rights of dogs and their owners will have little effect on the environment. Please take into account the interests of all SF residents when implementing a plan to protect our parks and beaches, and don't allow us to be the target of even more rules based on an incomplete and, in my opinion, biased study.

Thanks for reading this, and I hope GGNRA makes the right decision in this matter.

Correspondence ID: 3949 **Project:** 11759 **Document:** 38106

Received: May,30,2011 14:16:26

Correspondence Type: Web Form

Correspondence: To Whom It May Concern:

Although I no longer live the Bay Area, my dog and I enjoyed numerous hikes through the San Francisco beach areas - particularly Fort Funston and the associated beach area. I was alarmed to hear that there was discussion of making the area restricted to leashed dogs. While there are different variations in the proposals, I think it can be summed up that the new plans place far more restrictions on the area for dogs and dog owners than have been in place before.

Understanding that there are long-term environmental impacts to be considered, I can only relate my experience with the area when there were no "official" restrictions in place. At that time (approximately a decade ago), it was understood that dogs were leashed in the parking lots and areas leading to the dunes/beach area. Common logic prevailed: if a dog was unleashed, s/he could be hit by a vehicle or attacked by another dog. There was minimal policing of the area; individuals policed themselves - including staying off regrowth areas and sensitive dune sites. Dog-owners picked up after their dogs. If they did not, someone would remind them of their owner duties, or a "good samaritan" would do the pick-up. In other words, dog owners took the responsibility for the area. The reward was that the area was open for all and harbored a sense of community.

I'm concerned about these new proposals in limited roaming areas for dogs. Not only are the proposals costly (maintenance of site, policing the area, etc.), but by placing leashing restrictions no more and more areas, we are limiting the exercise/running drive in dog and frankly the rights of tax-paying dog-owners. While there are hundreds of places hikers and bikers can roam without dogs on trails, the number of open areas for dogs is ever shrinking. Where are these dogs to play and exercise. Small city "squares" within parks are not the answer - anyone with any knowledge of dog behavior knows that these areas are not conducive to socialization. Small

and limited spaces increase territorial issues which lead to dog aggression.

In my years taking our Rottweiler to Fort Funston, she never got into a fight with any dog. Why? Because she had the ability to run, exercise, and escape a potentially threatening situation (not that one arose). It was this relaxed atmosphere that became such a treat for both us and our dog.

Please reconsider putting any regulations in place at Fort Funston. It's important for the dog community and for the community as a whole.

Thank you.

Correspondence ID: 3950 **Project:** 11759 **Document:** 38106
Received: May,30,2011 14:17:31
Correspondence Type: Web Form
Correspondence: I have an active Labrador Retriever and own a home a half mile from Ocean Beach. We go there EVERY day. We run/walk from Santiago Street to the Cliff House and back. I have been doing so for twenty years. I CARE about this beach and all the creatures on it. I donate annually to both The Marine Mammal Center and to the International Bird Rescue and Research Center. My dog is leashed whenever she poses a threat to birds even on the "off-leash" area. Keeping Ocean Beach clean and a welcoming environment for flora, fauna and people is critical to me. My dog and I depend on this space for our wellbeing. Our social life revolves around the other caring beach people. Our appreciation for Ocean Beach is acknowledged every day and this beautiful space is never taken for granted. We watch out for issues that need attention and contact the beach patrol, GGNRA and TMMC when necessary. We have created a friendly, cohesive community. This Dog Management Plan assumes that millions of dogs are invading/threatening Ocean Beach and therefore must be prohibited. This is totally false. In reality, there are very few of us on the beach regularly. The weather and surface conditions are not inviting to most people. Only on exceptionally warm days (which are rare) is it crowded. GGNRA needs to understand that Ocean Beach is the western edge of a very dense urban city. This is San Francisco-a destination- not a rural area! People come to our city from all over the world and it's amazing how much JOY they get from seeing my dog in her element. They feel FREE NOT FRIGHT. All the GGNRA's inflated concern is invented. There are no more people with dogs now than there were twenty years ago. Ocean Beach is as wild and wonderful as it always has been and I want to maintain that. This draconian GGNRA plan is so suspect and potentially so damaging to those of us who live here. It's shocking to me how wrong this bureauratic nonsense is. Please realize, at the very least, this plan is UNREALISTIC and UNREASONABLE!

Correspondence ID: 3951 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: may 30th 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities.

Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Enable professional dog walking and align any professional dog walking rules with county or city regulations.

Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

With less than 1% of the GGNRA being used for off leash dog walking purposes, it seems only fair to keep the these areas used in their current state.

A joint effort of community meetings between Off-leash Dog walkers (both professional and non-professional) and the NPS could be used to address any problems that arise from the current use of off leash dog walking
Sincerely, Erik Heise erik heise (name) (address) San Francisco, california 94116(city, state, zip)

Correspondence ID: 3952 **Project:** 11759 **Document:** 38106

Received: May,30,2011 14:19:05

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing this letter to voice my opposition to the proposed GGNRA's draft dog management plan. I have read the plans for the areas that my dog, Monkey and I go to on a regular basis and their implementation would severely interfere with our quality of life. For the past two years, since Monkey was rescued, she and I have spent countless hours at Crissy Field, Ocean Beach and Fort Funston. These places have been instrumental in bonding me with this animal for life. When I first brought her home she was six months and had never been taken for a walk. She came from a 'backyard breeder' who sold her in a yard sale but soon (after a foreclosure) she ended up in the cages of a Vallejo shelter. She had little trust for anything human and that included homes and pretty much everything inside of them. Her fear was so acute in the first six months living with me and my husband that she would not come downstairs willingly and oftentimes had to be carried outside before she would walk. So in the beginning of our friendship it was these open spaces of fresh air and nature-filled oasis that allowed her to be free from the anxiety that being indoors brings her. Only outdoors did she show life and happiness!

Two years have gone by since Monkey has in fact rescued me. Because I have found that just like Monkey I am at my happiest in these open spaced, nature-filled oases. Monkey still struggles with wanting to be outdoors all the time but she has learned to recognize 'Do you want to go to the beach?!'

I know Monkey is just one dog but her story or similar ones are repeated thousands and thousands of times over in this beautiful city we all share. Thank you for taking the time to consider us.

Sincerely, Dorothy R. Adams

Correspondence ID: 3953 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. I have lived in Muir Beach for the past 11 years, and have two dogs as part of my family. Twice each and every day, our dogs are walked on the beach or run on the trails. Our house directly overlooks the beach and we have a clear view of the beach activities. After reading and reviewing the proposed plan, I believe that it is not based in fact and it relies on speculations and misleading statements. I believe that it will restrict my freedom and rights as a woman and as a dog owner. While I can appreciate that some people desire a "dog-free" experience on local beaches and trails, that option is already available at 99% of GGNRA lands, with the larger public beach at Stinson and most of the surrounding GGNRA trails already dog-free. In contrast, Muir Beach and the Coastal trails adjacent are the only dog-friendly options which remain in Southern Marin. I believe that the GGNRA can accommodate both recreation and conservation and its name GGNRA actually includes the very important word 'RECREATION'. It was designed as an urban recreation area for residents of the Bay area to recreate. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

The proposed plan disregards the health and well-being of people, dogs, and our community of Muir Beach and the surrounding communities who frequent the area. It arbitrarily excludes the residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and women like me who feel safe while enjoying the environs. Safe from not only animal predators such as coyote and cougars, but also menacing men who can be found lurking on the trails.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- Honor the original 1979 Pet Policy.
- Exclude speculative, exaggerated, biased, or misleading statements and studies.
- Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.)
- Eliminate "compliance-based management," which will

allow additional restrictions to be implemented without any public input.

As a resident of Muir Beach I walk the beach and the surrounding areas EVERY day usually twice each day with my dogs - I propose that the GGNRA: - continues to allow off-leash beach access for dogs. - maintain the dog-friendly Coastal Fire Road and Trail adjacent to Muir Beach - request an additional dog-friendly access of the Coyote Ridge Trail to Miwok Fire Road which would allow hikers with dogs to cross from Muir Beach into Mill Valley. - dog litter bag dispensers and waste receptacles placed at the footbridge entrance to the area. - Increased signage and education efforts provided by NPS so that all visitors to these areas are aware of current rules and regulations. Specifically: a large sign at the footbridge entry to the beach which clearly defines beach rules for all visitors.

Unlike an outright ban of one segment of the population, as is proposed in the NPS Preferred Alternative D, these efforts serve to educate and inform all visitors to the area, representing a true spirit of stewardship for the land. Additionally, these efforts will negate the need for costly reinforcement of new regulations. The preferred plan states that "off-leash dog walking can occur at a small beach area on county property adjacent to the NPS beach". This area is called "Little Beach" and it is not accessible without crossing the main beach or driving along neighborhood private roads. Most of the time, the rocks are impassible because of surf and tides. The "social trail" from Pacific Way to the north end of Big Beach is a steep, hazardous, rocky cliff pathway, with no handrails. There is no public parking on Sunset Way or Pacific Way. All lanes are fire lanes. Extra and illegally parked cars would create a hazard for the surrounding community in terms of blocking access to emergency vehicles. For those who would arrive on foot via the road, there are no amenities or services for Little Beach. No trash cans. No toilets- not a reasonable alternative. Formally stating and implementing such a plan would require appropriate impact studies and input from the surrounding community.

Thank you for the opportunity to comment.

Correspondence ID: 3954 **Project:** 11759 **Document:** 38106
Received: May,30,2011 14:34:57
Correspondence Type: Web Form
Correspondence: I am familiar with two areas of the plan: Baker Beach, and Crissy Field, so my comments will be mostly about those areas, though I think my points are relevant for the entire plan.

1. Regulated Off-Leash Dog Area - I assume this area would fill up with

dogs, like many of the city dog parks do. I've heard stories and witnessed plenty of incidents of dogs who are not controlled by their person, and these areas get pretty stinky too. I would not favor a ROLA in any of the areas under consideration.

2. Professional dog walkers - I think professional dog walkers should be prohibited from all areas under consideration. If they are allowed, I think they should be required to purchase a license for walking their dogs in GGNRA areas. In addition, I think the number of dogs they walk at one time should be regulated. 10 dogs make a pack. A pack of dogs is very different from an individual dog with its person.

3. Dogs under voice control - I favor the plans that include areas where dogs are allowed off-leash, as long as they are well-controlled by their person. No one should have more than one dog off-leash at a time.

4. In addition to the above comments, regardless of what plan is decided upon, I would favor the restriction of no more than three dogs per person. Period. And never should one person be allowed all three dogs to be off-leash at one time.

I am a dog owner. I love dogs. I think that for one person to be responsible for 10 dogs at a time is not fair to the dogs, and not fair to the people and other dogs that they encounter.

Thank you for the opportunity to communicate my views.

Correspondence ID: 3955 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. I have lived in Muir Beach for the past 11 years, and have two dogs as part of my family. Twice each and every day, our dogs are walked on the beach or run on the trails. Our house directly overlooks the beach and we have a clear view of the beach activities. After reading and reviewing the proposed plan, I believe that it is not based in fact and it relies on speculations and misleading statements. I believe that it will restrict my freedom and rights as a dog owner. While I can appreciate that some people desire a "dog-free" experience on local beaches and trails, that option is already available at 99% of GGNRA lands, with the larger public beach at Stinson and most of the surrounding GGNRA trails already dog-free. In contrast, Muir Beach and the Coastal trails adjacent are the only dog-friendly options which remain in Southern Marin. I believe that the GGNRA can accommodate both recreation and conservation and its name GGNRA actually includes the

very important word 'RECREATION'. It was designed as an urban recreation area for residents of the Bay area to recreate. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

The proposed plan disregards the health and well-being of people, dogs, and our community of Muir Beach and the surrounding communities who frequent the area. It arbitrarily excludes the residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, and minorities.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- Honor the original 1979 Pet Policy.
- Exclude speculative, exaggerated, biased, or misleading statements and studies.
- Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.)
- Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

As a resident of Muir Beach I walk the beach and the surrounding areas EVERY day usually twice each day with my dogs - I propose that the GGNRA:

- continues to allow off-leash beach access for dogs.
- maintain the dog-friendly Coastal Fire Road and Trail adjacent to Muir Beach
- request an additional dog-friendly access of the Coyote Ridge Trail to Miwok Fire Road which would allow hikers with dogs to cross from Muir Beach into Mill Valley.
- dog litter bag dispensers and waste receptacles placed at the footbridge entrance to the area.
- Increased signage and education efforts provided by NPS so that all visitors to these areas are aware of current rules and regulations. Specifically: a large sign at the footbridge entry to the beach which clearly defines beach rules for all visitors.

Unlike an outright ban of one segment of the population, as is proposed in the NPS Preferred Alternative D, these efforts serve to educate and inform all visitors to the area, representing a true spirit of stewardship for the land. Additionally, these efforts will negate the need for costly reinforcement of new regulations. The preferred plan states that "off-leash dog walking can occur at a small beach area on county property adjacent to the NPS beach". This area is called "Little Beach" and it is not accessible without crossing the main beach or driving along neighborhood private roads. Most of the time, the rocks are impassible because of surf and tides. The "social trail"

from Pacific Way to the north end of Big Beach is a steep, hazardous, rocky cliff pathway, with no handrails. There is no public parking on Sunset Way or Pacific Way. All lanes are fire lanes. Extra and illegally parked cars would create a hazard for the surrounding community in terms of blocking access to emergency vehicles. For those who would arrive on foot via the road, there are no amenities or services for Little Beach. No trash cans. No toilets- not a reasonable alternative. Formally stating and implementing such a plan would require appropriate impact studies and input from the surrounding community.

Thank you for the opportunity to comment.

Correspondence ID: 3956 **Project:** 11759 **Document:** 38106
Received: May,30,2011 14:39:44
Correspondence Type: Web Form
Correspondence: Frank Dea, General Superintendent: GGNRA

Engendering respectful collaboration among GGNRA stakeholders is the responsibility of GGNRA leadership and the National Park Service. For the first time since GGNRA establishment, I am inclined to believe that the City and County of San Francisco may be the more appropriate steward of GGNRA lands within our boundaries. I am saddened by this fact. I have been an active supporter of the GGNRA since its inception. Five generations of my family have enjoyed recreational time along our Ocean Beach corridor (since the late 1850's). I will provide a "map" to the evolution of my thinking on this topic below. Salient points will be highlighted so as to make a perhaps "too long" letter more accessible.

1). The GGNRA is designated a 'recreation area' for specific reasons. The mission of open space within an urban area is unique. This mission must reflect and balance the use requirements of a broad spectrum of stakeholders. Successful support of the GGNRA mission will not occur without strong stakeholder understanding & acceptance.

2). The City of San Francisco is one stakeholder in the GGNRA. This city has a large population of companion dogs, whose service is invaluable. As a licensed nursing home administrator, I can attest to the positive role of dogs in the lives of both independent elders and those who live in supportive environments. "Hug a pet" dogs spend hours each day providing therapy for institutionalized adults. They are rewarded for their work with recognition of, & response to, their needs. Many of these animals socialize and play at GGNRA sites. Large numbers of elders bring their dogs to GGNRA sites, as well. For many of these elders, their dogs open the door both to socialization and to the formation of community support networks which evolve through

their recreation areas. Aging in Place networking is now a popular movement, but vital informal networks were forged through dog walking sites beginning over 25 years ago. You can find such a support network by simply visiting Fort Funston and observing use patterns. Dog guardianship is an intergenerational activity. Therefore, community support networks rooted in this activity are also intergenerational and benefit the full community.

3). Acknowledging & planning for the varied the needs of urban dwellers and their companion pets is appropriate.

I very much appreciated the opportunity to review the plan with GGNRA personnel & private contractors provided during the spring. That being said, it was clear that seemingly all stakeholders had resorted to the use of "talking points", which indicates that the concept of successful collaboration in seeking the greatest common good had been abandoned. I was disappointed to discover mutual distrust between groups which should be focused on forging a inclusive plan incorporating recognition of all points of view with respectfully agreed upon & accepted compromise forged between disparate stakeholders. I believe that the GGNRA leadership's mission is to successfully develop collaborative models. Successful meeting models focused on collaboration between disparate stakeholders have, of necessity, been developed within San Francisco. As a neighborhood association president, I participate in such meetings routinely. National Park & :GGNRA leadership should learn to apply this successful model of collaboration as responsible public stewards of our shared open spaces. 4). While I understand that the GGNRA is a national recreation area, I must express my belief that comments from stakeholders many miles distant should not be equally weighted. I will provide an example supplied by a park rep. who cited a family from Chesapeake, Md. which were very distressed by the presence of dogs while visiting Fort Funston. They stated that the dogs were unruly, prevented their accessing the beach area, caused an allergic reaction in one of their children, and finally stated opposition to having unleashed dog recreation as this prevented them from enjoying time oceanside. Clearly, this family found Fort Funston while unable to find Ocean Beach, accessible from the Cliff House to Sloat Blvd. Their input is flawed and their use minimized by constraints of both geography and time.

5). Responsible stewardship requires full spectrum responsible use of limited resources. I will refer you to the SF RPD experience at Noe Courts in the early 1990's in support of this position. Noe Courts stakeholders fought each other until this hard lesson was learned. Dog owners and Coleman Advocates refused to compromise, wasting their energy on confrontation. In the end, park use was limited to only one of these stakeholders & everyone ultimately became a loser. In a short time, the park was overrun with less respectful , irresponsible users and the park became

dangerous for all residents of the neighborhood. This reality forced respectful collaboration and compromise among all stakeholders and only then was the full community able to enjoy their shared open space.

The presence of dogs and their human companions provides a committed stakeholder group which can monitor and maintain an area. In an age of limited financial resources, the community which spends the greatest amount of time at Fort Funston can also become the community which monitors, under the guidance of and in cooperation with park leadership, the quality of life for all at Fort Funston. Without the presence of those recreating with their dogs, this area will quickly be taken over by other, less respectful and responsible, populations. Fort Funston offers a rich environment for homeless encampments and drug dealing. Infection control and crime control will both become unmanageable on this tract of land without the high use pattern of the dog companion population. As a native plant enthusiast, I can guarantee you that I do not spend as much time working on native plant tracts as I do walking my dog when I have one.

6). While not currently a dog guardian, I have been one over the years. My last dog and I delighted in daily visits to Fort Funston. I am also a native plant gardener and an amateur wildlife/insect photographer. Thus, I appreciated and routinely spent time observing the restored habitat areas in Fort Funston with my dog under voice control. I clearly remember the distress the dog walking community experienced when, over a period of a week, the Fort's foxes were found eviscerated. At first the concern was that our community was responsible and that we must act to end the impact of irresponsible dog guardians. Ultimately, investigation proved that coyotes had entered the area. The presence of these wild animals caused a decrease in the presence of other wild life. I would hope to see responsible collaboration amongst all stakeholders, such as occurred during the time of the fox eviscerations, encouraged by GGNRA leadership. I believe that collaboration among stakeholders, leading to respectful use by all groups, will be the ultimate measure of success for urban recreation areas.

Respectfully, Chris Dillon San Francisco, California

Correspondence ID: 3957 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: /Users/marthawalters/Desktop/CFDG_Crissy_Field_addendum_final.pdf

Correspondence ID: 3958 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence: Web Form

Type:

Correspondence: May 30, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, My name is Lyn Stromberg. I am a 59 years old physician, currently living in Berkeley. I have lived in the Bay Area since 1980 when I came here to attend Stanford University School of Medicine. I fell in love with the Bay Area and the innumerable ways in which it is unique; I feel fortunate to be able to call it home. I have two vizslas, a high energy breed that requires ? and revels in ? the kind of exercise that can only be achieved on off leash runs. We come to the GGNRA at least a couple of times a month and most often visit the Fort Funston area. My dog-owning friends with whom I walk and I take great care to be responsible dog owners ? keeping our dogs under voice control, cleaning up after our dogs and ensuring that other non-dog owners sharing the trails enjoy their experience as well. Often, non-dog owners will stop us to ask about our dogs, requesting to pet them and expressing that they cannot own their own dog for various reasons but like to come to the off leash areas to enjoy them and see them run free. I am deeply concerned that the GGNRA's current preferred alternative seriously strays from the intent of the GGNRA to be a recreational area serving the multiple diverse needs of the population. Fewer individuals would utilize the GGNRA if these proposals, as they now stand, were to go into effect; I know I would come less frequently. Certainly, decreasing the careful use and enjoyment of this area cannot be the intent these changes. If so, this is a disservice to the citizenry.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The

fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Lyn Stromberg Berkeley, CA 94702

Correspondence ID: 3959 **Project:** 11759 **Document:** 38106

Received: May,30,2011 14:49:54

Correspondence Type: Web Form

Correspondence: I strongly object to the proposed establishment of a ROLA in Oakwood Valley for several reasons. First, its construction and use will destroy the existing habitat. Second, it will increase the number of cars in an area where there is inadequate parking, which will cause further destruction as car owners will undoubtedly create their own parking spaces. Third, it is my experience, as a runner and dog walker in both Oakwood and Tennessee Valleys for the past 26 years, that an increasing number of dog owners do not obey the rules, and I would discourage an increase in the number of dogs and dog owners in the area for this reason. Mill Valley already has an excellent dog park near the Middle School. It is a large space with water access. Rather than create another dog park, I suggest we encourage use of this park, and protect the precious habitat of Oakwood Valley.

Correspondence ID: 3960 **Project:** 11759 **Document:** 38106

Received: May,30,2011 14:52:32

Correspondence Type: Web Form

Correspondence: I fully support the National Park plan to greatly decrease off-leash dogs in GGNRA. Virginia Kibre

Correspondence ID: 3961 **Project:** 11759 **Document:** 38106

Received: May,30,2011 14:56:08

Correspondence Type: Web Form

Correspondence: I am very grateful that this plan has been created, and see much care and consideration of all aspects in its making. I am fully in support of the plan as it is, and I have further comments that I appreciate having the opportunity to

share.

I often take walks in the Presidio, and have felt the impact of dogs in my experience. It is common for me to see individuals with 7 to 9 dogs with them, usually at least half off leash. I feel strongly that professional dogwalkers, or even private citizens who own so many dogs, should not be allowed to walk with more than 3 dogs without a permit, and never with more than 5. I feel that professional dogwalkers are benefitting from all of the work done to care for the parks, and are making their profit at the expense of the public. I feel that they should be licensed and should pay for a permit for any use of the parks for walking the dogs, so that they are contributing a portion of their profits to the care and maintenance of the parks. All of their dogs should be on leash, except in designated off-leash areas.

In my personal experience, no matter where I am in the park, I rarely get to have a dog-free experience. I like to go to the park to experience peace and solitude, away from noise, and to enjoy the beauty of the landscape. However it seems like wherever I go, I need to deal with someone's dog running up to me - whether cute or intimidating, they are interrupting my experience - and are usually accompanied by their owner's shouting at them in an attempt to demonstrate their responsibility and control - which is usually futile and further distracting.

Sometimes dogs are threatening or make me feel stressed and nervous, and I have no recourse. Never mind the all too frequent unpleasant experience of unavoidably seeing dogs defecate or urinate. Not what I went out for. It seems that dog owners feel that all people should be as charmed by their dogs as they are, and seem insensitive to their impacts of noise, aesthetics, and experience of others who do not share their canine appreciation.

Dog feces make the park feel unsanitary, and have an impact on other species, such as butterflies, that live their lives by their sense of smell. They change the chemistry of the soil which can effect plant populations. They make parents uncomfortable having their children touch the plants along trails -when contact with plants is one of the great things an urban park makes possible.

What I really wish for, is to add to the plan, certain dog-free days, even in areas that allow dog use. For example - East Beach, which often feels like a dog run. For people who are seeking an undisturbed-by-dog experience, we are relegated to the small Snowy Plover refuge area - which doesn't seem right. Also for the health, recovery, and sanitation of these dog-used areas it would be beneficial to have dog-free days.

I feel that the city itself needs to start to set limits on the number of dogs its

public landscapes can support - licensing and having a saturation limit on the dog population, but this is beyond the scope of this plan. Thank you for making an effort to begin the important process of acknowledging the impact that uncontrolled dog-ownership has on our public landscapes, and the public who uses them, which include people like me, who would like to experience nature without dog interactions - and also the flora and fauna who rely on these landscapes as critical habitat refuges.

Correspondence ID: 3962 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 30, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

I absolutely love walking my Labrador at Fort Funston and at Crissy Field. I am a responsible dog owner. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: (here's

where you fill in your own personal story and what you've seen when you've been out at the GGNRA) Sincerely, Laura West San Francisco, CA 94114

Correspondence ID: 3963 **Project:** 11759 **Document:** 38106

Received: May,30,2011 15:00:14

Correspondence Type: Web Form

Correspondence: Regarding your preferred dog management plan: quite frankly I do not trust the GGNRA or NPS to review/analyze the comments submitted to the GGNRA/NPS regarding this plan in a fair and objective way. I heard that Frank Dean made the statement he would rather turn the lands back to the City (my preferred plan) than see them over run by dogs. And we're supposed to have faith that the GGNRA/NPS will review the comments honestly? If there are more comments in your favor are you willing to take a hard look and see how many are from people not even in the Bay Area? It's easy for the so called environmental groups to call on a nationwide letter writing effort supporting your plan when those people haven't set one foot in the areas that will be affected. In short, we don't trust you and we want objective oversight over the analysis/review process. You rigged the rule making process and quite frankly you've probably also rigged the review/analysis process. We demand an independent audit of all the public comments submitted.

Correspondence ID: 3964 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

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This plan disregards the health and well-being of people, dogs, and the

community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I've been taking my dog to Fort Funston for the 2 years I've had her. I make sure to pick up after her, prevent her from digging, and leave the area the way we found it. We've never seen a snowy plover, let alone chased one or disturbed its nesting area. Have you seen how many dogs go to Funston every day? If you put all those dogs into one small off-leash area, it will be a lot less enjoyable for both the dogs and their owners. And the stress on other city parks will be unbearable. Please keep Fort Funston open to people and off-leash dogs.

Sincerely, Margaret Crandall SF, CA 94107

Correspondence ID: 3965 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
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GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA) Sincerely, Aimee Porter San Francisco, Ca 94117

Correspondence ID: 3966 **Project:** 11759 **Document:** 38106

Received: May,30,2011 15:18:35

Correspondence Type: Web Form

Correspondence: Thank you for this opportunity to comment on the GGNRA Draft Dog Management Plan. I and my husband have been walking our current dog, Toby, and previous dog, Chrissie, for over two decades at Fort Funston. Fort Funston is a most special place for us, providing a place to exercise our dog, socialization of our dog with other dogs and people, as well as providing us with an opportunity for us to get exercise and connect with a wonderful community of people. I am very concerned that the GGNRA Draft Dog Management Plan overly restricts access of dog owners to a unique oasis in an urban area which provides a healthy outlet for dogs and their owners. I am also concerned that the new rules will only increase the likelihood of an increasing tendency in recent years for Fort Funston to be locked to completely restrict and block access to anyone in the early morning hours.

I am both a person who owns a dog but also is deeply concerned about our environment as well as need to share the limited gift of places like Fort Funston to be enjoyed by all of nature's creatures and vegetation great and small. I understand the balances and compromises that must be made by the GGNRA. But I also know that I and fellow dog walkers have been among

the most responsible and passionately caring folks for the existence and preservation of Fort Funston and other beaches in the GGNRA. We have worked hard to take personal responsibility to keep the area free of litter and dog poop with a glad willingness to pick up after others including many non-dog walking users of the area. As a whole, dog walkers in our community are polite, caring, and the greatest proponents and defenders of preserving natural parks and open spaces during a time that our state and nation would eliminate such places as an unnecessary expense.

So, I am asking that you reconsider your plan to look at better and less restrictive ways to serve the entire community and natural inhabitants of the GGNRA. I ask you to reconsider proposals that give GGNRA's major lovers, protectors, and users including the dog walking community a place that all can enjoy, protect, and improve what GGNRA provides. I ask that if there are any ways that in particular, the dog walking community is falling short in its responsibility in preserving and ensuring access to GGNRA, that it be given fuller opportunity and sufficient time to come up to the plate to address your concerns. I ask that you listen to the San Francisco Supervisors recommendation in their 10 to 1 vote to oppose GGNRA Draft Dog Management Plan.

Thank you again for the opportunity to comment.

Best regards, Derrick Kikuchi Daly City, CA

Correspondence ID: 3967 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: /Users/marthawalters/Desktop/2011.05.27__CFDG_GGNRA_DEIS_letter_.pdf/Users/marthawalters/Desktop/cfdg_deis.ltr2.pdf

Correspondence ID: 3968 **Project:** 11759 **Document:** 38106

Received: May,30,2011 15:20:45

Correspondence Type: Web Form

Correspondence: I am a San Franciscan resident with a 10 year old dog named Rudy. She is new to San Francisco having lived with my father for 10 years until he just recently died from cancer.

Living in the Mission is a VERY challenging place to walk Rudy. Its overwhelmingly concrete, crowded and stressful (on me and on my companion). Often we take car trips to more peaceful places like Bernal Hill

and Baker Beach. These places afford us the necessary opportunity to spread our wings and explore off-leash. When we finally get to take her leash off, Rudy is happy and harmless and very well watched (by me) in these spaces.

On a factual note, from what I have researched, there are no hard facts that dogs are detrimental. I have seen human beings being more detrimental to natural environments (plastic, noise, biking) than their pet companions. Based on my observation, my dog has had little to no environmental impact on the areas she has been off-leash in. Additionally, based on my observation, human activities I have observed have had a far more SIGNIFICANT impact on the environments.

I have read that dogs have been off-leash since the 1800s - so I ask why change this now? I see no immediate reason to change an essential pet policy and I don't think the GGNRA can "manage" this situation by eliminating dogs from it. Its not what I want as a dog guardian and a San Franciscan resident. And, I will continue to oppose this plan or any other that attempt to limit off-leash areas.

So, my official comment is that none of the preferred options in the proposed plan are acceptable or necessary.

There is no reason to change this pet policy. Most dogs in this city depend on off-leash areas to stay healthy and sane.

Please stop picking on the wrong target and pick on us humans.

Thank you.

Correspondence ID: 3969 **Project:** 11759 **Document:** 38106

Received: May,30,2011 15:24:07

Correspondence Type: Web Form

Correspondence: My name is Mandy Johnson. I am mother to Emma, a lovely 3rd-grade public school student; pregnant with my 2nd child; and the proud owner of two rescue dogs named Morty and Freddy. I have lived in Bernal Heights with my family for 12 years. I am also a public servant, working in management at the California Public Utilities Commission. I know a thing or two about rulemaking, and I can sympathize with the difficult task the NPS has ahead of it.

My husband, daughter, dogs, and I visit the GGNRA 4-8 times every month. We take our daughter's friends to Fort Funston after school and on weekend playdates; we bring our out-of-town visitors to Lands End and Baker Beach; we meet up with neighbors and friends at Crissy Field and Ocean Beach;

and, in every case, we bring our beloved dogs, Morty and Freddy. Morty's pure joy when he catches sight of the ocean is contagious -- he runs and we chase him; he explores and we find new things at which to marvel; he flops down in the surf to pose for photos; he greets other dogs, and we strike up conversations with other dog owners. Freddy is older and less active, but a trip to the GGNRA makes him seem young again. He enjoys the exercise, fresh air, and the admiration of other beachgoers. His gentle smile and impossibly furry coat attract children like a magnet; through Freddy, we have befriended countless toddlers and parents on the beach who love dogs, but don't yet have any of their own. The natural beauty we enjoy and sense of community we feel in the GGNRA is one of the things I love most about living in San Francisco.

When I first learned of the GGNRA Dog Management Plan/DEIS from other dog owners, I thought it couldn't possibly be as bad as they said. I, like the vast majority of dog owners, respect and follow park regulations, but I'm not blind to the small minority who don't. I love taking my dogs to Fort Funston, and I can understand the concern with dogs straying off the trails leading up to the beach. Like most dog owners, I'm also a nature lover and environmentalist; I share the GGNRA's desire to maintain park resources for future generations. I recognize that some additional restrictions -- or, at least, additional enforcement of existing restrictions -- could, if done right, be to everyone's benefit.

When I attended the public meeting on March 7 to learn more about the DEIS, however, I was disheartened. I came in with an open mind -- and talked to several NPS staff who also seemed open-minded -- but encountered more than a few NPS staff who became unmistakably cold and aloof once I identified myself, respectfully, as a park visitor and dog owner. I got a sinking feeling that the fix was in.

While the Preferred Alternative seems reasonable in the case of heavily-used Fort Funston and Crissy Field, it struck me as unnecessarily restrictive in several other cases, specifically:

-- Lands End: My family and I visit Lands End more frequently than any other part of the GGNRA, parking in Sea Cliff and entering from the east side. Even on the sunniest Fridays and Saturdays, I'm struck by how open and uncrowded the park seems (until you get within 200 feet of the west parking lot, that is.) Our typical walk takes us from the east entrance along the Coastal Trail, down to Mile Rock Beach, and back. On average, we spend 2-3 hours there and see fewer than 5 other dogs. At the beach itself, we often see absolutely no one else for 15-20 minute stretches (which never ceases to amaze me, because I think it's one of the most breathtaking parts of the GGNRA). While we don't see a lot of people at Mile Rock Beach, we do see a lot of what they have left behind; I always leave the beach with a

backpack full of garbage I picked up while scrambling across the rocks. The Preferred Alternative would ban dogs from Mile Rock Beach altogether -- and for the life of me, I cannot conceive of why. It is a solution in search of a problem. -- Ocean Beach: One of our favorite family outings starts at the N-Judah turnaround. We cross over to Ocean Beach and walk the dogs on-leash to Stair 21, then off-leash as far north as the tide allows; we then go back the way we came, and finish with a hearty lunch at Outerlands cafe. On these walks, I'm struck by all the refuse left behind by picnickers and late-night bonfire revelers; by all the deep treads left behind by the GGNRA 4x4 trucks running back and forth on the beach; and by the fact the friendliest, most responsible beachgoers, by far, seem to be other dog owners. Like at Mile Rock Beach, I usually leave Ocean Beach with a backpack full of empty Coke cans and Doritos bags that I've picked up along the way. Under the Preferred Alternative, the litterers will still be welcome up and down Ocean Beach, but my dogs and I will not. I can understand keeping dogs on-leash south of Stair 21 (although, I think if plovers are the prime concern, we should start by eliminating the truck traffic, bonfires, and periodic bulldozing that occur in that area), but I cannot understand the rationale for banning them entirely from that stretch of beach. The ban is not supported by the (rather methodologically thin) evidence GGNRA presents of habitat disturbances, and it is certainly not supported by my frequent firsthand experiences. -- Baker Beach: Unless it is a rare 80+ degree Saturday or Sunday -- when hordes of people flock to the beach -- I have found Baker Beach to be a surprisingly quiet and relaxing place to bring my daughter, her friends, and the dogs. Even on sunny days with little wind, we get large swathes of the beach all to ourselves. I also don't see a lot of dogs here (especially not on those very few hot, crowded weekend days); it is not a highly-trafficked beach, like Crissy Field or Fort Funston. The restrictions on beach access and elimination of off-leash recreation seem arbitrary, at best. Again, the Preferred Alternative seems like a solution in search of a problem. -- New Lands: This is where, frankly, it really feels like the fix is in. Regardless of how the land was used prior to acquisition by GGNRA, the Preferred Alternative deems it off-limit to dogs. This approach not only disregards the fact that GGNRA is a recreation area, where the needs of the surrounding urban communities must be considered; it is self-defeating. The opposition and public outcry that will inevitably come from dog owners whenever GGNRA considers acquiring new land will almost certainly torpedo the deal -- whereas coming in with a balanced, open-minded approach would blunt public opposition, and likely redound to the benefit of GGNRA. The fact that GGNRA is taking a hard line, I fear, tips its hand. And its hand looks awfully anti-dog.

More generally, I don't understand why the GGNRA has proposed a "compliance-based" enforcement strategy for the new dog regulations. If the NPS has sufficient resources to do this level of enforcement now, why haven't they applied them toward enforcing existing dog regulations? The

California State Parks, while famously and woefully underfunded, have a strong ranger presence to talk with visitors and make sure all regulations are followed; I regularly encounter and talk with rangers in my visits to state parks. By contrast, I rarely see NPS rangers at the parks outside of their 4x4 trucks. The dog owners I know would welcome enforcement of existing park regulations -- both dog-related and otherwise -- because we all care about conserving these gorgeous and important natural resources. Much like the Preferred Alternative to managing New Lands, the "compliance-based" enforcement strategy is overtly confrontational and, ultimately, self-defeating. Aggressively seeking out a small number of violators in order to justify a crackdown on dog access, and putting the new restrictions in place automatically -- completely bypassing the public comment process -- may not be legal and most certainly will be unpopular. If the GGNRA wants the City and County of San Francisco to try to take back GGNRA land, this is an excellent way to do it. As someone who loves and enjoys GGNRA land, I have to believe the NPS has better ways to expend its time and resources than willfully courting public controversy.

Thank you for your consideration. I appreciate that you are wading through a lot of passionate comments on all sides of this question. I just hope that, in spite of my worries, you will be fair, reasonable, and open-minded in seeking solutions that consider the needs of all stakeholders.

Correspondence ID: 3970 **Project:** 11759 **Document:** 38106
Received: May,30,2011 15:35:13
Correspondence Type: Web Form
Correspondence: May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Superintendent Dean:

I am a senior with a home in San Francisco. I and my senior dog frequently walk at Fort Funston and Crissy Field. We walk in the GGNRA because we are safe walking there ? there is a community of folks who walk there who share common interests ? dogs, love of the environment, and the enjoyment of nature ? and because in this very populous city, the GGNRA is our place for recreation.

I strenuously object to the "Compliance-based Management Strategy", which could arbitrarily and unilaterally end off-leash recreation, without public input or objection. It is unjust because those who are irresponsible, or who are deemed to be irresponsible, would decide the fate of off-leash dog-

walking in the GGNRA. In addition, the "Compliance-based Management Strategy" also works in only one direction: towards less off-leash space. There is no positive reinforcement, only punishment. The "Compliance-based Management Strategy" also violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be.

This "Compliance-based Management Strategy" should not be part of any Dog Management Plan. The GGNRA already has policies and penalties for those who break the laws. Use the law and punish the offenders. Do not punish the innocent for the faults of the guilty, and do not destroy a loved and valuable institution because some irresponsible people do not follow the rules.

I object to the GGNRA's current preferred alternative, which almost eliminates off-leash dog walking within the GGNRA. The proposed changes are not based upon sound science, or upon proper monitoring of site-specific conditions. Rather, I support an approach that balances recreational use, including off-leash dog-walking, with preservation. This would be a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written, and that also includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA.

Finally, I ask that you hire an independent and neutral third party to receive, count, organize and analyze the comments sent to the GGNRA regarding the Dog Management Plan. Otherwise, there will be no oversight, no watchdog, and no credibility for any results which the GGNRA might announce or purport to use as a basis for future action.

Thank you for your consideration.

Sincerely,

Dr. Renee Pittin San Francisco, CA 94131

Correspondence ID: 3971 **Project:** 11759 **Document:** 38106
Received: May,30,2011 15:38:16
Correspondence Type: Web Form
Correspondence: May 30, 2011

Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I moved to San Francisco in 1962 and raised my family mostly in Marin. I have felt extremely grateful for the beauty and benefits of the GGNR. I am now 78 and live half time in my condo in San Francisco. I continue to cherish the area as an ideal place for daily walks with my dog.

I am devoted to nature and respect your intention to preserve it in all its wonder, but I am totally opposed to what I consider to be an arbitrary increase in already restricted areas for man and dog recreation. As I understand it, GGNRA's current preferred alternative significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. In addition, as presented in the DEIS, the proposed dog management plan eliminates dog-walking (on and off leash) in all new lands (additions to the GGNRA sometime in the future). Such a plan appears to ignore the extraordinary value to man and beast of dog walking and equates this valuable form of recreation with environmental destruction, a linkage that in my mind has not been demonstrated.

I suspect that the vast majority of dog owners is being punished for the misbehavior of a few. This is obviously not a way to solve a problem, in so far as it exists. Personally I always walk with my dog on leash and monitor him closely. My dog-walking companions do the same.

The No Action alternative or variations on that alternative should be the plan of choice, including individual consideration for any new lands.

Thank you for your consideration.

Sincerely,

Susan Shaffer Member, Crissy Field Dog Group Member, Sierra Club

Correspondence ID: 3972 **Project:** 11759 **Document:** 38106
Received: May,30,2011 15:40:33
Correspondence Type: Web Form
Correspondence: To Whom It May Concern:

I am a Marin County resident, dog owner, and a donor to the Golden Gate National Parks Conservancy.

Please cast my vote for maintaining current levels of off-leash dog access to

GGNRA lands. I understand that complications arise from this policy (as do for any policy adoption), but feel strongly that they can and should be mitigated. We need to share the park responsibly. Off-leash (as well as on-leash) dog access is already quite limited in the GGNRA in Marin, please don't punish those of us who want to use the parkland responsibly with our dogs.

I am fully supportive of requiring dog owners and dog walkers who use the GGNRA to be responsible park users. Perhaps we could be required take classes on responsible dog management, or required to volunteer to restore habitat, etc., and/or pay licensing fees to subsidize classes, patrolling, and/or other mitigation efforts. Allow the dog owning community to be good GGNRA patrons.

Please maintain a balanced policy and keep the GGNRA open to a wide variety of users. Keep off-leash access at current levels!

Thank you,

Amy Larson

Correspondence ID: 3973 **Project:** 11759 **Document:** 38106

Received: May,30,2011 15:44:46

Correspondence Type: Web Form

Correspondence: I have been a professional dog walker at crissy field for the last 6 years.

In addition to cleaning up after myself and my dogs I also routinely collect human waste, both trash and biological. Condomns, syringes, feces and menses are are in a typical months work.

The professional dog walkers seem to be the only ones aware of the rules, like staying out of the dunes, lagoon and off the main trail while offleash.

I routinely encounter civilians letting their dogs dig for gophers and chase the protected wildlife.

If this is such a problem wouldn't it make sense to actually post these rules?

How can you be upset that people are disobeying unpublicized rules?

How on earth do you plan on enforcing all these new rules when you haven't even posted the existing ones?

I'd also like to point out that crissy, ocean beach and fort funston have

entirely different user bases and the dog walkers at each location have adapted their systems to reflect that.

This is all very sad.

What would be so hard about limiting your liability by charging an entry fee? You could print the limited liability waiver on the back of the ticket just like an amusement park does.

What would be so hard about segregating the beach? A picnic area without dogs, a dog area without picnics.

Without these open spaces dog quality of life will deteriorate and behavior will accordingly. You will see friendly dogs become aggressive.

I find it frustrating that my tax dollars pay you to arbitrarily nearly shut me out of business.

Please try to work with us. Sending mounted police to patrol dog parks is hostile and unnecessary. Why can't park police walk? Wouldn't walking and talking with us be a good place to start?

I'd love to have a park policemen take 45 minutes to go on a complete walk with me sometime.

I bet we don't disagree on as much as you'd think.

Thanks for listening, Wild Bill Peacock

Correspondence ID: 3974 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and

misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

* Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. * Exclude speculative, exaggerated, biased, or misleading statements and studies. * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). * Enable professional dog walking and align any professional dog walking rules with county or city regulations. * Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Aria Ashton

Correspondence ID: 3975 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

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The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

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- * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- * Exclude speculative, exaggerated, biased, or misleading statements and studies.
- * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- * Enable professional dog walking and align any professional dog walking rules with county or city regulations.
- * Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when

you've been out at the GGNRA)

Sincerely, Angel Cassidy-Borst

Correspondence ID: 3976 **Project:** 11759 **Document:** 38106
Received: May,30,2011 15:49:43
Correspondence Type: Web Form
Correspondence: Dear Supervisor Dean-

This is the letter I wrote to Supervisor Weiner and Mayor Lee. It summarizes the distrust and doubt I have about this process.

Dear Supervisor Weiner:

Below is the letter I wrote to Mayor Lee on Tuesday, detailing my experiences in negotiating with the GGNRA. They have not been negotiating in good faith. I am saddened by the this, because we are all essentially open space advocates. However, this has brought out the worst in otherwise good people.

Please be careful. Thank you.

Lisa V.

----- Forwarded Message ----- From: Lisa Vittori <> To: mayoredwinlee@sfgov.org Sent: Tue, April 19, 2011 6:01:51 PM Subject: Please stand up to GGNRA

Dear Mayor Lee-

Thank you for expressing interest in talking with the GGNRA regarding their heinous "dog management plan". I appreciate the fact that you are looking out for the interests of San Francisco residents in this matter. However, I must warn you: the GGNRA has not negotiated in good faith so far.

I speak from personal experience, as an environmentalist and a former ally and employee of the GGNRA. Over the last 35 years:

* I watched as the GGNRA (and the National Parks Conservancy) moved from an attitude of inclusion to a policy of exclusion. * I've watched as they acquired land by promising to continue existing recreational uses, then renege. * I personally managed major habitat restoration projects for ten years with my dogs by my side, until they started using habitat restoration as

a reason to exclude the public. * I watched as they touted community collaborations in public, and plotted in private (e-mails, staff meetings, internal memos) to limit recreational dog-walkers, children's camps, equestrians, surfers, wind-boarders, and other park users.

You may recall the infamous public hearing held in January, 2001, in which the GGNRA was required to receive public testimony regarding limiting dog-walking. I was there.

The weather was terrible ? blustery rain. The location was obscure ? a little known building in the Presidio. The time was inconvenient ? a week night in January. Yet ... 2,000 people showed up. Well dressed people slogging through muddy parking lots, standing in the rain because there wasn't enough room in the building. The park service finally opened an overflow room after hundreds of people, normally upstanding citizens, started banging on the picture windows, demanding entry.

The most interesting part of that meeting for me occurred during a break at around 11 p.m. Amy Meyer, one of the GGNRA commissioners, was speaking to a group of employees. She thought she was speaking off the record, to allies. I joined the group.

She expressed annoyance that the meeting was dragging on so long, then said: "I don't know why they're bothering. We've already made our decision." At that point more than 600 people were still signed up to speak, and the meeting was aborted at midnight.

That, Mr. Mayor, is why we are asking for your help, and why we beg you to be cautious in your dealings with them. The decision was made at least 15 years ago. Public input has been a sham, despite the massive public outcry over the last 10 years.

We think they need to start entirely over, and include us as full stakeholders in the process.

Thank you for your attention to this.

Lisa Vittori

P.S. I refer you to a letter sent today by another citizen, a brilliant letter that accurately summarizes our hopes and concerns.

Dear Mayor Lee-

I understand that you'll be speaking with the National Park Service regarding their proposal to sharply reduce off-leash recreational space in the

GGNRA, and I hope that you'll bring to that discussion your patented brand of common sense. It's sorely needed in this debate.

This tiny sliver of the GGNRA that we dog folks get to share (it's less than 1%...and although the NPS will tell you that figure is bunk, we have the maps to prove it) is not pristine wilderness. These are former military facilities, bounded by busy roads, traversed by trails, paved for parking and dotted with decaying batteries. That's why we ended up there with our dogs to begin with...no one hassled us there. And that's why our access to these areas was made legal and why the NPS was told it must honor that access or the city would take back the land.

In fact, the whole refurbishing of Crissy Field was designed with off-leash recreation in mind. Tens of millions of dollars were raised, much of it from dog owners, on the promise that this would be the model for integrating recreation (including off-leash) and habitat creation. Is the NPS prepared to give that money back, now that they are proposing to renege on that promise?

Mayor Lee, these parks mean so much to the citizens of San Francisco. And not as fenced-off untouchable gardens of native plants, but as vibrant, beautiful open spaces we all can share. Off-leash recreation brings together San Franciscans of every age, ability level, social strata, sexual preference, race, creed and political stance. It requires no expensive equipment, no proficiency in English and no membership fee. Hell, it doesn't even require a dog (many non-dog-owners gravitate to Funston et al for vicarious doggy time). It relieves stress, promotes healthy exercise, increases social contact and brings revenue to the furthest reaches of the city.

I hope that you, as our Mayor, will stand in support of this wonderful use of our urban open spaces. If wear and tear from concentrated use and conflicts from crowding are legitimate concerns, then expanding the area available for off-leash recreation is a much more logical solution than reducing it.

Please tell the GGNRA to go back to the drawing board.

Thank you for your consideration, XXXX (Another citizen)

Correspondence ID: 3977 **Project:** 11759 **Document:** 38106
Received: May,30,2011 15:52:23
Correspondence Type: Web Form
Correspondence: I primarily use the Alta trail head from Donahue Street in Marin City to walk my two pugs off-leash. I have seen hundreds of dogs which also use this section of the fire road over the 16+ years that I have been a resident

here. I have never witnessed anything which might be considered harmful to this environment as it relates to pets and their owners being allowed to exercise untethered. Several dog walkers depend on using this section of the trail for exercising the dogs of their clients. All of them have either kept their dogs on a leash or under good voice control whenever I have come across them.

Please keep This section of the fire road available for off leash use.

Correspondence ID: 3978 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly in the GGNRA with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse

impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan:

I am an 11-year resident of San Francisco and an active outdoor enthusiast. Together with my dog Walter, a 2-year old German Wirehaired Pointer, and my family and friends, we frequently hike in the Marin Headlands, play at Muir Beach, and visit Fort Funston for walks on the beach and hikes along the trails above the ocean. While at Fort Funston I have observed whales swimming up the coast of the Pacific Ocean, owls in the cypress trees, and ravens circling above the cliffs. My dog, on the other hand, keeps his eye on his tennis ball and he hasn't once had any interaction whatsoever with birds or other animals living in these areas. Moreover, because he is under voice command and sticks with me, he does not roam in any of the areas to the south of the Fort Funston parking lot where efforts are being made to restore native vegetation.

As a dog-owner, I have given up visiting some of my former favorite recreational areas because those locations either don't allow dogs or require the dog to be on a leash and that option does not provide good exercise for either me or my dog (e.g. Tennessee Valley Beach, Mt. Tamalpais, many state parks and beaches in Marin and Sonoma County, and the majority of Golden Gate Park). My dog and I greatly prefer Fort Funston and other GGNRA open spaces to city parks because the surroundings are more beautiful and both my dog and I get plenty of room to run and roam. These GGNA open spaces are a safer experience for dogs than city parks, as there no need to worry about cars and broken glass, and I also feel personally safer given that these spots are less urban.

When my dog was a puppy, I took him to Fort Funston daily, and he grew accustomed to returning to me promptly on voice command, playing well with other dogs and meeting a variety of people. As a result, he is a calm and friendly pet. I visit either the Marin Headlands or Fort Funston at least once or twice a week now, and if we didn't have this resource we would be forced to travel much farther from our home to find any comparable open space for hiking that allows off-leash dogs.

In the two years that I have visited Fort Funston and the Marin Headlands with my dog, I have not once seen a negative interaction between dogs and humans. The concept that humans are or could be "surprised" to find off-leash dogs in these areas is simply incomprehensible as these areas have been open to off-leash dogs for over 40 years and it's obvious from the

minute you arrive in the parking lot from the signs and simple observance of what is going on around you.

Finally, I am particularly opposed to the 'Regulated Off-Leash Areas' or ROLAs. It is simply unacceptable that the NPS can revoke access in the future to the ROLAs without further consultation and public comment. This provision appears to violate basic administrative law principles.

I urge you and your staff to seriously consider these comments and redraft the dog management plan to maintain the current off-leash areas, pursuant to the 1979 Pet Policy.

Sincerely,

Ellen K. Brown San Francisco, CA 94117

Correspondence ID: 3979 **Project:** 11759 **Document:** 38106

Received: May,30,2011 15:58:06

Correspondence Type: Web Form

Correspondence: I am writing in opposition to the draft Dog Management Plan. I would like to see the current rules and regulations remain as they are, with perhaps a seasonal adjustment to limit impact on the habitats of the endangered species that use the GGNRA. Preferring to walk my dog at Muir Beach, and as a long time user of the beach, I am basing my arguments in opposition to the Plan on my experiences there.

One of the reasons given for banning dogs at Muir Beach is that park visitors want a "dog-free" experience at the beach. This is simply false. In all of the years that I have been walking my dog(s) at Muir Beach, the number of times that I have been told, or have recognized through body language, that someone does not want contact with my dog(s) is probably less than 10. Far outnumbering that, guessing at 25 or even 50-1 are the number of times that people have expressed a desire to pet my dog(s), their excitement at seeing them play on the beach and the missing of their own pets that they've had to leave at home during their travels.

The Dog Management Plan calls for more funding for greater enforcement and signage of the new regulations. I would suggest that the higher funding could be used both to enforce current regulations and to install signs that actually let people know what those regulations are. The signs in place now are do not clearly state current regulations, are ambiguous at best and are poorly posted and easily missed. As to better enforcement, a few citations would begin to get the word out resulting in better compliance.

That better enforcement though would have to include the use of the lagoon by people, not just dogs and their owners. On any given weekend, there are far more people, families and kids, swimming, digging, and damming the creek and lagoon than the occasional dog.

Thank you.

Correspondence ID: 3980 **Project:** 11759 **Document:** 38106

Received: May,30,2011 15:58:32

Correspondence Type: Web Form

Correspondence: Frank Dean May 27, 2011 General Superintendent GGNRA Building 201 Fort Mason San Francisco, CA 94123-0022

Dear Mr. Dean, Re: Healthy Parks Healthy People US, etc.

My name is Lindsay Kefauver, I live in San Francisco and have been walking my dogs at Ft. Funston since 1978 for 33 years. I am a senior whose health and mental well-being is enormously benefited by being able to walk the trails at Fort Funston where I usually go 5 afternoons a week. I need to walk on paved paths as cannot get exercise standing around in a sandlot as you propose at Ft. Funston.

My vote is for Alternative A + or the status-quo of the 1979 Pet Policy. The plus is because we desperately need more access for off-leash dog walking on the GGNRA managed lands not less. When the GGNRA adds land then you must open up to more off-leash access.

The GGNRA's preferred alternative is clearly too restrictive. There is no justification in the DEIS for major changes to the legal 1979 Pet Policy - yes, twice a US Federal Judge has found your 1979 pet policy to be legal.

Please retain and formalize this existing GGNRA dog policy. The Park Service has not provided any measurements showing that dogs at Fort Funston, Ocean Beach or Crissy Field have a significant impact on the sustainability of threatened and endangered species of wildlife or native plants.

Then what about the NPS's May 31st conference on The Healthy Parks Healthy People US being held in the Golden Gate National Recreation Area? This is being billed as "the first of its kind in the United States...The forum will help forge a vision for the role of parks in contributing to a healthier nation."

I suggest that the GGNRA stand behind what you are promoting as a

national program. By choosing to restrict where health enthusiasts can walk in the GGNRA lands, many of whom are women and seniors who might not walk without the company & protection of their dog, you are denying a large group of Bay Area citizens what you pretend to be promoting for the US.

Instead of punishing responsible people with dogs who benefit so much from these recreational areas, why don't you try promoting educational awareness with new adequate signage and initially have park rangers out with good will and information instead of acting as a police force.

The fact that the NPS is promoting Healthy Parks Healthy People US at the GGNRA headquarters but instead working to restrict its own local citizens from the benefits of this program makes the program a total sham.

Please work to make the Bay Area a true proponent of Healthy Parks Healthy People US or the program will come back to embarrass the GGNRA.

Sincerely,

Lindsay Kefauver

Correspondence ID: 3981 **Project:** 11759 **Document:** 38106
Received: May,30,2011 16:00:41
Correspondence Type: Web Form
Correspondence: Please keep a friendly open environment for doggies. My dog is walked for me since I work... He is so happy when he returns home from hanging out with his friends and walker. We love to be at the beach and play areas on the week end. Part of the wonderful lifestyle in northern California. Please don't take that away!

Correspondence ID: 3982 **Project:** 11759 **Document:** 38106
Received: May,30,2011 16:03:58
Correspondence Type: Web Form
Correspondence: Dear GGNRA Dog Management Plan, I am a long time resident of San Francisco and have lived my entire life in the San Francisco Bay Area, during the past 60years, I have seen open fields and hillsides converted into subdivisions and with thier loss a loss of diversity and numbers of wildlife. I hope that the GGNRA will continue to preserve some of the 'wild outdoor' experience that shaped my childhood and make it available for future generations. I realise that there are just so many of us humans crammed into

this small area that the availability of having wilderness experiences may never be the same as what I remember, but I would encourage you to take steps towards preserving what you can by limiting our impact on the environment by restricting dogs to only certian trails and further requiring them to be leashed. With the difficulty in finding funding, it may be difficult to fund enforcement, but I think it is imperative that the law is strictly enforced at least initially so that private citizens can feel empowered to enforce it as time goes on. Also there should be clear and explicit signs so that everyone is clear on what is and isn't allowed. I do not think that the GGNRA is the place for commercial dog walkers. I have seen dog owners' comments in the newspaper that they need to run their dogs off leash in the GGNRA in oder to give them adequate exercise. The city parks generally provide fenced areas for dogs to run off leash in areas that are not also the home to native flora & fauna. If dogs must have off leash areas in the GGNRA, I think that they should be fenced and clearly marked and located in areas that are not sensitive habitat. Finally, I would like to thank you for taking on this contentious but important issue. Sincerely, A Presidio Park Steward volunteer (and I volunteer because I care about the environment)

Correspondence ID: 3983 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:05:02

Correspondence Type: Web Form

Correspondence: To Whom It May Concern:

I am writing in response to the GGNRA Draft Dog Management Plan and to express my vehement opposition to it. I have a dog and frequently walk her in the spaces that are being discussed in the plan and want it to be known that what is being proposed will greatly alter my daily schedule and ability to freely walk my dog.

It is not for a government body, which does not reside in our community, to dictate what we can and cannot do as a community. This sort of decision should be left to the people of San Francisco (and surrounding areas) to determine what is best for our community and, as you can most likely tell, we do not want there to be a chance in policy.

Please let it be known that I, Zoltan Bernat, a resident of San Francisco, CA, am going on record to voice my opposition for the Draft Dog Management Plan. If you have any questions, please feel free to email me at

Sincerely,

Zoltan Bernat

Correspondence ID: 3984 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:05:40

Correspondence Type: Web Form

Correspondence: In support of well-defined and realistically enforced dog management:

I am a very frequent park user. It's important to have a peaceful nature space. I walk and enjoy the ocean or the woods as a companion.

Unfortunately my precious outdoor time has been increasingly degraded by untrained, unrestrained, unavoidable canine influences. By this i mean dog noise, dog excrement, random dogs jumping on me, dogs charging & nipping at me, owner & dog on leash taking up the whole 2-way path with no intention, awareness, or effort to "keep to the right". These intrusions occur in dogs-allowed parks, no dogs-allowed parks, and stretches of shoreline that are bird sanctuaries.

Case in point: On this morning's walk at Ocean Beach, 2 people and their dog were coming from the parking lot across from the zoo, heading north. (Bird Sanctuary.) The dog stopped to poop. (The dog owners did not.) The good-intentioned dog-owners were carrying plastic bags, but never looked over at their dog 3 yards away, just kept going. (High tide; off the stools went to sea.)

Correspondence ID: 3985 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:11:12

Correspondence Type: Web Form

Correspondence: Frank Dean May 27, 2011 General Superintendent GGNRA Building 201 Fort Mason San Francisco, CA 94123-0022

Dear Mr. Dean, Re: Is your Compliance-based management strategy legal?

My name is Lindsay Kefauver, I live in San Francisco and have been walking my dogs at Ft. Funston since 1978 for 33 years. I am a senior whose health and mental well being is enormously benefited by being able to walk the trails at Fort Funston where I usually go 5 afternoons a week and once a week to the beach. I believe that most dog guardians in the Bay Area are as much environmentalists as those of you who aim to ban dogs from our shared, public open spaces.

My vote is for Alternative A + for the status-quo or 1979 Pet Policy. The plus is because we need more access for off-leash/under voice control especially in San Mateo where there is currently no off-leash access and a

request to add off-leash areas as more lands are acquired.

The GGNRA's compliance-based management strategy - commonly referred to as the "poison pill" - of the preferred alternative must not be part of any plan. I'm not convinced that this GGNRA strategy is legal. If the GGNRA decides there is not enough compliance with their new restrictions, the status of areas in the GGNRA will automatically and permanently become more restrictive - off-leash becomes on-leash, and on-leash becomes no dogs at all.

How will the GGNRA determine compliance? Will they use volunteers biased against dog walkers? Will it be staff who have gone on record as opposing people with dogs in the GGNRA.

The DEIS does not offer an opportunity for the public to comment on these changes. The rules will be changed essentially at the whim of a GGNRA official. And no reverse process is offered by the GGNRA - if there is good compliance then more areas are opened up for off-leash, etc.

The GGNRA presents no guarantee of fairness. In fact the DEIS is saying that it is okay for the GGNRA to exclude one group of citizens from our public lands. Isn't this discrimination?

You and the GGNRA must ensure we citizens that you will have an independent review of our comments and that it will not be the GGNRA staff who categorizes, analyses, and evaluates the public comment on such an important issue to the Bay Area.

Thank you for your attention.

Sincerely,

Lindsay Kefauver

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|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 3986 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | Mon. 5/30/11 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I use Fort Funston on a weekly basis (2-3 visits per week) and Chrissy Field occasionally. I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The | | |

GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA) Sincerely, Matthew Condrin

Correspondence ID: 3987 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:12:42

Correspondence Type: Web Form

Correspondence: I previously submitted comment letters by US certified mail on May 13, May 14, May 15, May 16, May 17, and May 18, 2011.

In those letters I erroneously said that Alternative A could be turned into a truly preferred alternative if only off leash areas were also provided at GGNRA sites in San Mateo County. I had overlooked the fact that Alternative A inexplicably removed off leash access from most of Ocean Beach. That is not justified, and off leash access should be restored to Ocean Beach as part of a preferred alternative.

Protection of the Western Snowy Plover is the chief rationale offered by GGNRA for banning off leash dogs from most of Ocean Beach. I, and others, have explained in other comment letters how WSP can be protected without banning off leash dogs. I won't go through that entire discussion

again. But effective GGNRA management actions would include seasonal exclosures, signage and education, prompt garbage pickup, and keeping other disturbances out of the immediate area where plovers are roosting. (I have observed horses, kite flyers, runners, picnickers, and NPS vehicles flushing WSP at Ocean Beach.)

Further GGNRA could have an independent study done to see what, if any, effect off leash dogs have on WSP at Ocean Beach. The DEIS and the "studies" cited therein haven't demonstrated any adverse impact of off leash dogs on WSP at Ocean Beach.

Sincerely, Keith McAllister

Correspondence ID: 3988 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:12:59

Correspondence Type: Web Form

Correspondence: I am a San Francisco resident (1990-1996 and 2006-2011) and a dog-owner; I take my dog to Fort Funston an average of about five times a week. For the 10 years that I was away from SF, I lived in a city with no dog parks, and found myself frequently talking to people about how much I loved Fort Funston, and about the dog-friendliness of the Bay Area and its parks, including the GGNRA. I am very concerned about the proposed limitations to dog-walking throughout the GGNRA, but as I am most familiar with and most attached to Ft. Funston, I am restricting my comments to that area.

I understand the need to protect wildlife and natural resources, and I accept that those efforts may require additional limitations on off-leash use of Ft. Funston. Regarding the needs of "people who don't prefer dogs," I am perplexed by the singling out of this group. In the plans for Fort Funston, the impact on "people who don't prefer dogs" seems to be the primary advantage claimed for the "Preferred Alternative (C)" over the existing system or the less-dog-restrictive Alternative E.

If I do not prefer children, or joggers with huge strollers, or the smell of meat cooking, or frisbee playing, I do not look to rules, regulations or park management to restrict access or activities in a particular park. Rather, I go to a park where I am less likely to encounter these things, or I go at a different time than those people. "People who do not prefer dogs" have many, many options for outdoor recreation in beautiful places. On the other hand, my options are limited when it comes to outdoor, off-leash exercise for my dog - state parks do not allow dogs at all, and many city parks require that dogs be leashed at all times.

The executive summary acknowledges that the Preferred Alternative would

have an adverse impact on people with dogs, but I believe the adversity will be much greater than what is claimed. Right now, the impact of many, many dogs and dog-walkers on Ft Funston is relatively small because we have access to the entire park. Limiting or eliminating off-leash access in so many GGNRA lands, and reducing the off-leash area at Ft Funston to the beach and the area adjacent to the parking lot is going to force many, many dogs and humans into a very small space. The increased traffic will kill off more vegetation; the higher density of dogs per square foot may increase conflicts (as will the requirement that dogs be on leash in the rest of the park - dogs on-leash are generally much more aggressive with each other than those off-leash); the likelihood of stepping in feces will be much higher - because not all dog owners are as responsible as we'd like them to be.

Given the restrictions proposed in so many other parks, I would propose that taking no action at Ft Funston would be the equivalent of a "fair trade" between the NPS and Bay Area dog owners. Recognizing that "no action" is not the most likely outcome, I believe Alternative E is the best of the alternatives presented in the report. Better yet would be a plan in which the off-leash areas in Alternative E were increased by adding the area just north of the parking lot, effectively making the park about one-half off-leash and one-half no-dogs or on-leash.

Correspondence ID: 3989 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:14:42

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. I believe the plan will have a negative impact on the residents of the City of San Francisco, as it proposes extremely restrictive policies about where we will be able to enjoy off-leash hiking, running and other recreation with our pets.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily ignores the needs of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

In my opinion, the GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area--and it IS an URBAN recreation area--not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. Further, by my observation and in my experience, there are quite a number of restrictions on off-leash use of GGNRA land already in place, but

enforcement seems to be the real issue. I fear that if these more restrictive regulations are enacted, it will only be the law-abiding dog owners who will suffer; the scoflaws won't care about the new restrictions--just as they don't follow existing laws now. I have also observed that when people and their families walk with their pets, they are more open to meeting other people, usually via inquiries about their pets. In the years we've had our dog, we've met more people and engaged in pleasant conversations with strangers than I have ever experienced in all my years before owning a dog. I truly believe pets can bring out the best of humanity in us all.

The GGNRA draft management plan does not provide tangible evidence that justifies such drastic changes to 40 years of healthy dog and human recreation. The Park Service should honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Recognize that there are hundreds of uninhabited miles along the California coastline for wildlife to thrive, while we San Franciscans and our pets have a 7 x 7 mile peninsula on which to recreate. Please do not adopt the proposed regulations, but rather, honor the 1979 Pet Policy.

Thank you for your time and consideration.

Sincerely,

Renee A. Richards San Francisco, CA 94121

Correspondence ID: 3990 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:20:11

Correspondence Type: Web Form

Correspondence: I am writing to strongly oppose the GGNRA's draft dog management plan. While I understand and support your conservation efforts, I believe this current plan does not adequately reflect the importance of off-leash dog walking areas in, or near, San Francisco.

While I do believe the current plan relies on some questionable studies to draw certain (questionable) conclusions, I am not a scientist, and therefore cannot speak directly to these points. Instead, I simply want to voice my concern that this plan does not adequately consider the negative impacts on all Bay Area residents.

For the past 8 years we have taken our dog to Fort Funston twice a week. This is a necessary and important routine in our lives to maintain the health of our dog, and ourselves. Fort Funston, and other parks mentioned in your plan, provide essential off-leash areas in a way that a standard dog park cannot. While San Francisco does provide (limited) off-leash dog parks, the

bulk of them are far too small to be of any real value for medium to large dogs.

The GGNRA land is an integral part of Bay Area life. It provides the only truly open space within reasonable distance. The current policies in place already severely limit dog access to GGNRA land, and these proposed restrictions will unfairly reduce that access even further - leaving many dog lovers with no viable options.

I ask that you please reconsider these proposed restrictions, to more adequately balance the needs of all parties. Please don't take away our only option.

Correspondence ID: 3991 **Project:** 11759 **Document:** 38106
Received: May,30,2011 16:21:19
Correspondence Type: Web Form
Correspondence: Frank Dean, GGNRA Superintendent Building 201, Fort Mason San Francisco, CA 94123-0022 Re: Golden Gate National Recreation Area Dog Management Draft Environmental Impact Study Dear Superintendant Dean:

I have already sent comments on the DEIS for Marin Unleashed. The following comments are my own.

I have spoken with you several times about my intention of sending you suggestions that you could consider for dog management in the GGNRA in Marin.

I understand the concerns that you and many others have about dogs off-leash in areas where there are wildlife and fragile eco-systems that require protection. I share these concerns.

With that in mind, I put forth the following alternative:

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

roads that run near the boundaries of the GGNRA with these communities should be accessible to the public walking with their dogs on-leash.

? The fire roads that lead from the neighboring communities into the GGNRA and run adjacent to them are, from Muir Beach in the north to Sausalito in the south:

? Coastal Trail from Muir Beach to Coastal Fire Road to Coyote Ridge Trail (a fire road) to Miwok Trail (a fire road).

? Miwok Trail from Highway 1 to Coyote Ridge Trail.

? Miwok Trail from Tennessee Valley Road to Coyote Ridge Trail.

? Marin Drive from Tam Valley to the Miwok Trail.

? County View Road from Tam Valley to the Miwok Trail.

? Tennessee Valley Road (or the adjacent Rhubarb Trail (Marin County trail)) to Oakwood Valley Fire Road.

? Oakwood Valley Fire Road from Tennessee Valley Road to Alta Trail (a fire road).

? Alta Trail from Donahue Avenue in Marin City to Rodeo Valley Trail.

? Pacheco Fire Road from Marin City to Alta Trail.

? Orchard Fire Road from Marin City to Alta Trail.

? Rodeo Avenue from Highway 101 to Alta Trail.

? We are requesting on-leash access to two trails because they provide access to 2 of the fire roads listed above:

? The Morning Sun Trail that was built to provide access from Sausalito to the GGNRA Headlands; it goes from the Spencer Ave bus-pad on the west side of 101 up to Alta Trail.

? The SCA trail that runs parallel to Wolfback Ridge Road and about 20 feet below it. This trail connects Alta Trail with the fire road (this one is unnamed) that goes over the 101 tunnel and then back into Sausalito (it comes out on Hecht Avenue).

The fire roads listed above are 12 feet wide on average, providing plenty of room for multiple use. Dogs on a 6 foot leash will not be causing damage to

wildlife or native habitat, or disturbing other users. These fire roads are all adjacent to the freeway and/or the communities of Southern Marin. They are not in the heart of the Headlands. They can all be accessed from outside the GGNRA reducing auto traffic into the GGNRA.

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

Thank you for this opportunity to share my thoughts on a subject that so many of us feel so strongly about (and so differently about). Wishing you all the best in the work you have ahead.

Sincerely,

Sonja Hanson Sausalito, CA 94965

Correspondence ID: 3992 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:26:00

Correspondence Type: Web Form

Correspondence: I am an executive at John Muir Health in Contra Costa County. Please reconsider your "Dog Management Plan." Taking hikes, etc. with the family dog is a very valuable opportunity of exercise and social contact. Your proposal to ban such activities I feel significantly diminishes opportunities for improving the health and well-being of our population.

Thank you for listening.

Correspondence ID: 3993 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:30:55

Correspondence Type: Web Form

Correspondence: May 30, 2011 Frank Dean, General Superintendent GGNRA Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

My name is Alexandra Dixon and I have lived in the Marina/Cow Hollow neighborhood for 50 years. I have had dogs in this neighborhood since 1977 and I have walked them in all areas of the GGNRA over the past 34 years. I take my dog to Crissy Field almost daily, and have also walked my dogs at

Fort Funston, Fort Mason, Fort Cronkhite, the coastal trail to Tennessee Valley and Muir Beach, Muir Beach itself, the Dipsea Trail, and Stinson Beach.

In all that time my dog has never had a negative environmental impact, nor has any of my dogs ever had a negative exchange with another living creature, including wildlife, other pets, or human beings.

I used to say, long before this ridiculous kerfuffle about off-leash recreation came up, that it is worth \$10,000 a year to me to have access to Crissy Field for off-leash recreation.

I am a member of the Fort Mason Community Garden, I believe in sustainable agriculture, I take public transit, I believe in having a small environmental footprint and in saving endangered and threatened species, and in particular I believe that man should not have unfettered dominion over the natural world, and should not allow his own selfish needs to have a negative effect on the creatures that share our space.

Having said all that, I also absolutely believe that a "National Park" in a densely populated urban environment is different from a park in a pristine wilderness such as Yosemite or Yellowstone.

Much of the GGNRA land in question was deeded to the NPS by the City of San Francisco in good faith with the stipulation that traditional recreational uses be preserved. The Park Service has acted in bad faith by slowly chipping away at off-leash recreation in Fort Funston and Ocean Beach. The City of San Francisco is within its rights to rescind the gift of these areas, and if you proceed with restricting off-leash recreation in these areas, please be prepared for the City to do just that, because the dog owning community is a HUGE percentage of the SF population, and we are well-heeled and well-organized.

I do not agree with any of your preferred alternatives; it is my conviction that the GGNRA should be providing MORE off-leash recreation, not less. The 1979 Pet Policy does not provide enough space for off-leash recreation but since it is the "least evil" of the options on the table, that is the option I prefer.

I have read analyses of the DEIS and am convinced that there is no sound science, nor public policy data, that provides support for further restricting off-leash recreation in the GGNRA. I believe that the NPS entered into this process with a biased point of view, attempted cynically to manufacture scientific evidence to support that point of view, and FAILED to do so. So we get 2400 pages of fluff, with no facts to back it up.

The 1979 Pet Policy which is presently in effect has ample teeth to ensure compliance if it is enforced. Despite what many people think, the off-leash policy does NOT permit ill-behaved dogs to disturb wildlife, people, or even other dogs. The policy is, and always has been, "voice control or leash." At any time, a park Ranger or Park Police officer can require a dog owner to prove that his or her dog is under voice control, and if the person fails to demonstrate this, can require that the dog be leashed, and can issue a citation to the owner.

Surely, with the vast majority of dogs being well-behaved, this is the logical approach to take - enforcing the current regulations with the few dogs that are not in compliance.

In addition, any "poison pill" that allows the NPS to unilaterally ban dogs from areas if - in the NPS's sole judgment - there is not 70% compliance, is an attempt to do an end-run around the civil/legal rights that all citizens enjoy. It's clear, at least to me, that the NPS views all of the alternatives as mere stepping-stones to their ultimate goal of banning dogs from the GGNRA - and what better way to do that, than to put in a poison pill which can be invoked at the NPS's sole discretion, without further public comment. I would NEVER support any alternative with such a provision. And, if an alternative containing such a provision is implemented - be prepared for a lawsuit.

After careful consideration, I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written (there is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers), and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration.

Sincerely,

Alexandra Fiona Dixon mailing address: San Francisco, CA 94123

home address: San Francisco, CA 94123

Correspondence ID: 3994 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Limit off-leash recreation to areas where it will not have negative impacts

on sensitive wildlife and habitats and also on people. For example, I would love to take advantage of the walks offered by the "Y" in the Presidio, but cannot because of all the dogs off leash. Dog walkers take 4 or 5 dogs on these paths and let them run wild. It is terrifying because the dogs turn into packs and can be very dangerous.

I can never go to the beach either because of all the dogs off leash. Again the dog walkers are a big problem here. I have seen some dog walkers that don't even know the names of the dogs to call them off.

It seems so unfair that as a tax paying San Franciscan, I cannot enjoy some of the beautiful outdoor spaces that the city has because of all the off leash dogs. There needs to be more stringent regulations. And most importantly, they need to be enforced.

I hope that something can be done about this situation so that all the residents of this city can enjoy all the outdoor areas it has to offer. Thank you.

Correspondence ID: 3995 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:37:21

Correspondence Type: Web Form

Correspondence: Dear GGNRA Staff,

It is my feeling that Fort Funston fulfills a unique recreational need in the Bay Area and is in fact one of the best off leash dog areas in the world. We train our program's dogs here to be under good off leash control. We also take Canine Studies students from all over the world to Fort Funston to show them how dogs of many breeds can learn to be compatible with people and other dogs.

In the proposed option for Fort Funston the trails would be closed to off leash dogs. This would lead to a higher number of off leash dogs concentrated in the ice plant area close to the parking lots. Currently dogs start off here but quickly move on into Fort Funston. With the new plan they would tend to stay in this area. This concentration of dogs would create problems due to the increase in dog density. It would also become less safe due to proximity to moving cars.

I proposed that you keep Fort Funston as it has been for several decades. It has proven to be an ideal example of how large numbers of people and dogs can recreate in an enjoyable and safe manner. It is a shining example of how an off leash recreational area can meet the recreational needs of people with and without dogs. You have a real jewel to point to that's unique in the

world. Please don't destroy it through closing portions of Fort Funston to off leash dogs.

Thank you,

Donald Martyn

Correspondence ID: 3996 **Project:** 11759 **Document:** 38106
Received: May,30,2011 16:52:10
Correspondence Type: Web Form
Correspondence: May 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, As a responsible, working, tax-paying San Francisco resident and dog-owner I am writing to oppose the GGNRA's draft dog management plan.

Seven years ago my husband and I looked the pros and cons of becoming urban dog owners. We talked with many, many city dog owners. We went to the off-leash dog parks to observe the environments. We went to Crissy Field and Fort Funston to see the areas that are available for off-leash dog walking. We received such positive recommendations that indeed San Francisco is one urban area that is dog-friendly and in fact, a great place to own and run a dog.

In particular, it was the 1979 Pet Policy where the city of San Francisco gave much of the land to the GGNRA with the express purpose that it would be used as it had been historically for recreational purposes, which includes dog walking that ultimately tipped the scale in favor of us getting our dog.

In the seven years since then we have enjoyed hundreds of beautiful walks on the beaches of Fort Funston and Crissy Field with our dog. During the week when we are at work, we pay a responsible dog walker to transport our dog to the beach and give her the exercise she needs to stay healthy. Our dog walker follows the rules of the area and never walks more than 5 dogs at one time.

In all that time I have rarely seen dogs cause problems or chase wildlife. As a matter of fact, usually the chasers of wild life are children or tourists.

We are positively behind the idea of establishing professional dog walker

rules and fees.

If off-leash areas are taken away we really may have to consider leaving the city of San Francisco now that we own and are responsible for the well-being of a large, energetic dog.. At the VERY least, I feel it would only be fair, if restrictions are to be imposed, that they go into effect after a 14 year grace period, allowing any new dog owner the current rules for the lifetime of an average dog. I'm not sure we would have made the decision to own a dog if it weren't for the current Pet Policy.

Sincerely, Joan Yokom San Francisco, CA 94103

Correspondence ID: 3997 **Project:** 11759 **Document:** 38106

Received: May,30,2011 16:57:42

Correspondence Type: Web Form

Correspondence: I am a senior citizen, 73 years of age, who has lived in the Sunset District for 40 years. Since retiring 14 years ago I have been a daily visitor, rain or shine, at Fort Funston with my dog who is under voice control.

I deeply resent this third attempt to largely negate the 1979 Pet Policy.

If you visit the Fort during the week you will see that the majority of the visitors are seniors with off-leash dogs. Most of these visitors are women who feel perfectly safe from crime due to the presence of the dogs. On the weekends, there are also many families with children who visit with their dogs. Obviously, they feel comfortable with the off-leash dog policy.

If you severely limit the off-leash area, as is planned, you will have overcrowding with it's problems.

Another issue is the Native Plant situation. Some years ago a great effort was initiated, building fences and planting native plants. Since then, these efforts have ceased. The fences are falling down and covered with sand. Planted areas are filled with weeds and no effort is being expended to maintain them.

One other aspect to this effort to severely limit the off-leash area is on our local San Francisco Parks that allow off-leash dog walking. One example is Stern Grove. Recently, when Fort Funston was closed for a day due to the Tsunami warning, many dog walkers including some professional dog walkers with multiple dogs, converged on Stern Grove, increasing the number of dogs from the usual fifty to between two and three hundred. According to the local San Franciscans who utilize Stern Grove on a daily basis, this created a very unstable and over-crowded situation. Other San

Francisco dog friendly parks will also be negatively affected. Fort Funston does not exist in a vacuum.

In summary, Fort Funston is a wonderful place with a varied and very responsible clientele. Any changes should be carefully thought out and should be minimal. I support the Modified Alternative A (the No Action Alternative) that codifies the 1979 Pet Policy as it was originally written.

Thank you for your consideration.

Sincerely,

James Krotzer

Correspondence ID: 3998 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: 5-30-2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate from congress for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city

regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: I have been walking my dogs at Fort Funston, since I moved back to the bay area in 1995. My dogs do not dig nor do they chase birds. They walk with me and play with other dogs they meet. It has helped with making my dogs better canine citizens. I have seen horses ride through snowy plovers, yet no one talks about banning them, and yes in my mind and by your actions that is what your intent is, the banning of dogs. I have met a lot of wonderful people that I most likely would never have met if I was not walking my dogs on GGNRA lands.

Sincerely, Joe Hague San Francisco, Ca

Correspondence ID: 3999 **Project:** 11759 **Document:** 38106
Received: May,30,2011 17:14:14
Correspondence Type: Web Form
Correspondence: Dogs should be banned from Muir Beach.

I support Alternative D, with the caveat that dogs should be completely banned from Muir Beach.

Recently I was at Muir Beach and I saw a lady walking 3 huge dogs. One of these dogs made a big poop on the shoreline. Not far away a few children were running in and out of the water. I asked the lady to please scoop up the poop. She told me not to worry, that the ocean would take care of it. I took out my camera and took a picture of the poop, the lady, and her dog. She immediately reached into her bag, brought out a plastic bag, and scooped up the poop.

This same big dog stood up on a large beam of driftwood and sprayed an enormous amount of pee all over the end of it, and onto the sand around it. Only a few moments earlier, I had seen small children playing in that exact same spot, and putting sand in their mouths, as children will do.

I wish I could say this was an isolated incident, but it is not. I have a hundred examples.

10 years ago I would have said that a few dog owners have ruined it for the many. However, times have changed. In the past 2 years I would have to say that the many dog owners have ruined it for a few.

In the past year I have observed the following at Muir Beach: On any given day, fewer than 10% of dog owners will honor the code. 8 out of 10 dogs are

off the leash. Of these, zero to one is under voice control. Almost every dog at the beach gets into the creek, and some of them play in the creek for a very long time. The new signage does not seem to be any help at all.

On most days, there are more dogs on the beach than there are people. This has become the norm. More than half the dogs will form a pack, and their owners let the dogs run wild, knock children over in the water, and get into domination fights. Very few dog owners will get into the middle of the pack and break up fights.

Dogs pee in the sand, in the creek, and on most of the driftwood.

On some days, going to Muir Beach is like visiting the dump. I just turn around and go home. We need to take better care of this Park.

I suspect that most of the responses you receive will be from dog owners who will want to maintain the status quo. This will unfairly weigh against the natural wildlife, the creek, vegetation, sand dunes, and the many young children who cannot speak for themselves. Think of my voice as one who is representing all of these. And also representing those of us who simply want to enjoy the wildlife and the scenic beauty in a natural environment.

Please hold tough to your proposal. Thank you for all your efforts.

Correspondence ID: 4000 **Project:** 11759 **Document:** 38106
Received: May,30,2011 17:16:39
Correspondence Type: Web Form
Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979 Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

I am a dog volunteer at the SF/SPCA, and have been walking and training dogs there for 10 years. I also assist in public classes. I can tell you that the well-being of a dog (and its human family) is dependent on off-leash exercise and interaction with other dogs. A tired dog is more trainable, gets along with other dogs, and has a higher quality of life. Too often we see dogs turned into shelters because their owners were unable to find a place for them to play. Dog owners in urban areas don't always have yards, or a park nearby to exercise their dogs. This results in dogs that aren't social, and can lead to them getting euthanized in kill shelters for bad behavior.

In San Francisco particularly, dogs are a member of the family, and with some folks, their ONLY family. Please do not remove dog recreation from

GGNRA.

Correspondence ID: 4001 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: To whom it may concern:

I read the following letter to the editor in the San Francisco Chronicle on Thursday, May 12, 2011, and feel it perfectly reflects my feelings on the dog leash issue in the Golden Gate National Parks.

Please protect our rare and precious Bay Area biodiversity by requiring dogs in the GGNRA to be on leash and by limiting the number of dogs a single person can bring into the park. National Parks are intended to protect the land for the enjoyment of future generations, not this generation's pets.

Thank you.

-- "Leash commercial dog-walkers"

Commercial dog walkers are abusing our parks.

As a frequent visitor to the Presidio, I encounter many groups of eight to 12 off-leash dogs in all areas of the park.

Although I love dogs, it does not seem fair or appropriate for commercial operators to allow their paid-for charges to run rampant in public parks where they threaten native wildlife and plants, as well as adults and children.

At the very least, these commercial operators should be limited to four on-leash dogs (the maximum one person can truly manage) in specific areas of the park.

They should be held accountable for infringements of park policies and, as other park vendors do, should have to purchase a license to operate in the park.

These funds could be used to enforce the regulations and maintain the dog-access areas.

Jean Colvin, San Francisco

Available at: <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2011/05/11/EDRE1JEE52.DTL#ixzz1NKeBoUeI>

Correspondence ID: 4002 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:22:35

Correspondence Type: Web Form

Correspondence: The time my family and I spend outside with our dog has been a wonderful experience for all of us. Our lab is in voice control on most trails with few people and on leash where required or there are just too many people/dogs around. Either way, GGRNA has been the reason we live where we do. Please leave the dog laws as they have been. Our dog gets us up and out in nature- enjoying what we pay to live near and pay to have open. We are strong paying park supporters who enjoy the outdoors with our dogs.

Correspondence ID: 4003 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:23:41

Correspondence Type: Web Form

Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979 Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

GGNRA was created for recreation, not preservation. To try to impose conservative policies to protect the animals in this environment is just crazy - we are talking about urban setting, not pristine conditions of National Parks, where preservation is justified. One cannot bring back these condition to urban environment with hundredth of thousands of people in the area unless you also plan to eliminate those populations in order to set aside areas for snowy plovers, garter snakes, and red-legged frogs. It really boils down to what is preferable to local residents, not GGNRA. It's people that must prevail, not GGNRA (ostensibly hired by and working for those people, although the record and "management plans" show otherwise) who is trying to protect a few animals that are actually doing quite well even without the presumptuous "protection" of GGNRA wild life conservancy plans, which are not backed up by science but by merely "good intentions".

We cannot bring back American Indians, and the fauna and flora of bygone years, it's too late for that now, after millions of people have moved in, intend to stay, and want their dogs to have some unleashed fun. Let's have reason and sanity prevail!

Correspondence ID: 4004 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:24:34

Correspondence Web Form

Type:

Correspondence: I'd like to thank everyone working on this plan for the hard work they're putting in dealing with a complicated issue with a lot of opinions on all sides. And of course by commenting here I'll throw yet another opinion into the mix.

I just got back from hiking around the Presidio. While there I noticed tons of dog prints all over the sandy dunes where fragile habitats can easily be damaged by that amount of foot traffic off the trail. This was right next to signs asking people to stay on trail. It seems far too many dog owners just don't realize how their dogs can affect those surrounding areas.

On the same hike we saw a dog tearing back and forth in this sandy area where it looked like native plants had been planted, or were at least struggling to establish themselves. If we want these areas to remain beautiful for many years to come, we need to allow the habitat restoration being done time to take hold, and when dogs are running completely free everywhere, it can really damage that progress in making, and keeping, our parks beautiful and great for all of us to enjoy.

I believe we can help protect these areas by making sure there are lots of good, clearly identified places, where dog owners can bring their dogs, but keep a lot of areas either dog-free, or only on leash. Education for the public is also important, to keep us all aware of how we can use our parks in a sustainable way ? in the same way people understand they shouldn't litter in a park, because if everyone did, it'd be full of trash, people need to understand they can't let their dogs run free because if everyone did, our parks would slowly degrade and no longer be the beautiful place they'd like to bring their dogs.

Thanks for your time and consideration.

Best, Josh

Correspondence ID: 4005 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:26:55

Correspondence Type: Web Form

Correspondence: Frank Dean, GGNRA Superintendent Re: GGNRA Draft Environmental Impact Statement (Dog Management Plan) Report from Eco-Dog Coalition/evaluation of Ken Weiner, Atty at Law Report from Marin Unleashed Dear Frank: The Park Service's Dog Management Plan that is currently receiving final comment is of major import to a large percentage of the Marin County population and will affect the lives of many. You and I

have talked about this several times before. I am writing you today to support and re-emphasize a few specific points. These recommendations are offered following research, not knee-jerk reaction or opinion. That is why I support them, and I hope you will give them thoughtful consideration. One general point that I find particularly disturbing is the lack of participation allowed to Marin County in creating the Reg Neg committee itself. To exclude such an extensive natural area from even being at the table as a stakeholder to me seems patently absurd. Agreement or disagreement with concepts or proposals is one thing; exclusion from participation in the discussion about them is quite another. While this is water under the bridge at this point, I believe it diminishes the overall quality and efficacy of the report itself. It has been posited that only three of the areas in the 1979 Pet Policy for Marin County were Discussed by the Reg Neg committee. Further, few of the areas included in the 1979 Pet Policy for Marin are included for consideration in the Draft Plan/DEIS alternatives for Marin. This appears to be a serious oversight in my view. However, getting to specifics that have a substantial effect on my community of in Marin County, and even more specifically Southern Marin, the proposals I am focusing on largely concern permitting on-leash access on the fire roads that run along the borders of the GGNRA with neighboring communities ? e.g. Sausalito, Marin City, Tam Valley, Homestead Valley, Mill Valley and Muir Beach. I support the proposal for on-leash access on these fire roads, and the 2 trails that provide access to them: The fire roads: Coastal Trail from Muir Beach to Coastal Fire Road to Coyote Ridge Trail (a fire road) to Miwok Trail (a fire road); Miwok Trail from Highway 1 to Coyote Ridge Trail; Miwok Trail from Tennessee Valley Road to Coyote Ridge Trail; Marin Drive from Tam Valley to the Miwok Trail; County View Road from Tam Valley to the Miwok Trail; Tennessee Valley Road (or the adjacent Rhubarb Trail (Marin County trail)) to Oakwood Valley Fire Road; Oakwood Valley Fire Road from Tennessee Valley Road to Alta Trail (a fire road); Alta Trail from Donahue Avenue in Marin City to Rodeo Valley Trail; Pacheco Fire Road from Marin City to Alta Trail; Orchard Fire Road from Marin City to Alta Trail; Rodeo Avenue from Highway 101 to Alta Trail. And the two trails: The Morning Sun Trail that was built to provide access from Sausalito to the GGNRA Headlands; it goes from the Spencer Ave bus-pad on the west side of 101 up to Alta Trail. The SCA trail that runs parallel to Wolfback Ridge Road and about 20 feet below it. This trail connects Alta Trail with the fire road (this one is un-named) that goes over the 101 tunnel and then back into Sausalito (it comes out on Hecht Avenue). I ask that you give a careful added review to these sections. The difference it would make, to add these areas, would be immeasurable to the dog-owning residents of Southern Marin. Furthermore, many of the residents in these areas, like Wolfback Ridge, have been consulted on these proposals and have no problem with them. In conclusion, there are references made in their in-depth reports by the representatives of the Eco-Dog Coalition, and of Marin Unleashed. Those prepared by the latter group are offered in an

effort to establish the voice that was excluded from the table during the discussion and drafting of the current proposal. I have reviewed some, not all, of their material, and a few items jumped out as reasonable and important. For example, a comment is made about lack of clear and consistent communication in GGNRA areas ? what are the rules, where and when do they apply? There is no question that clarity helps people obey the law, and the more adequate it is, In many instances the less enforcement is needed. I am including signs, brochures, websites and maps, and this might benefit from another look ? it could be to your advantage. There also has been review done by Ken Weiner, a NEPA lawyer, that probably has had, or deserves your attention in the review. I do indeed realize the gargantuan job you have on your hands in reviewing so much material and, most likely, so many opinions. Nonetheless, if the job is going to work, and stand up to time, it requires no less. It will affect, and most likely change, many lives of the residents of our Bay Area communities in very basic ways. I will be attending the Breakfast sponsored by the Marin Conservation League on June 10, at which you and Cicely Muldoon will be speaking. I look forward to seeing you again, and hope we'll have an enlightening and amicable discussion there. Meantime, I apologize for the length of this letter, but wanted to share a few views. Good luck, Frank, in your mission. Warmest personal regards, Amy Belser

Correspondence ID: 4006 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:28:54

Correspondence Type: Web Form

Correspondence: I just submitted a comment, but I wanted to add the following:

To whom it may concern:

I read the following letter to the editor in the San Francisco Chronicle on Thursday, May 12, 2011, and feel it perfectly reflects my feelings on the dog leash issue in the Golden Gate National Parks.

Please protect our precious San Francisco ecology by requiring dogs in the park to be on leash and by limiting the number of dogs a single person can bring into the park.

Thank you.

-- "Leash commercial dog-walkers"

Commercial dog walkers are abusing our parks.

As a frequent visitor to the Presidio, I encounter many groups of eight to 12

off-leash dogs in all areas of the park.

Although I love dogs, it does not seem fair or appropriate for commercial operators to allow their paid-for charges to run rampant in public parks where they threaten native wildlife and plants, as well as adults and children.

At the very least, these commercial operators should be limited to four on-leash dogs (the maximum one person can truly manage) in specific areas of the park.

They should be held accountable for infringements of park policies and, as other park vendors do, should have to purchase a license to operate in the park.

These funds could be used to enforce the regulations and maintain the dog-access areas.

Jean Colvin, San Francisco

Correspondence ID: 4007 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979" Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

Correspondence ID: 4008 **Project:** 11759 **Document:** 38106
Received: May,30,2011 17:30:26
Correspondence Type: Web Form
Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979" Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

Correspondence ID: 4009 **Project:** 11759 **Document:** 38106
Received: May,30,2011 17:41:53
Correspondence Type: Web Form
Correspondence: I support the GGNRA's efforts to protect endangered species, native habitat,

and restored habitat, from off-leash domestic animals (dogs) with the proposed plan. The role of the National Park Service is to balance the needs of the environment, our national heritage (natural, historic, cultural), and our human needs for recreation and pleasure (including animal companions). The notion that domestic dogs are being mistreated by the proposed policy is an exaggeration fueled by the intense bond that people feel with their animal companions and the confusion of human long-term perspective with the short-term joy/frustration of dogs and other domesticated species. The freedom of animal companions to range unleashed (or even under voice control or leashed) over native plant and animal habitat does not trump our responsibility to restore and preserve native habitat and to protect threatened and endangered species. Without the latter, our experience of National Park lands is infinitely poorer.

Correspondence ID: 4010 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:42:04

Correspondence Type: Web Form

Correspondence: The following are my comments on the Golden Gate National Recreation Area Draft Dog Management Plan / Environmental Impact Statement (DEIS). I support Alternative A, the no-action alternative.

My comments are organized around the following topic areas.

1. Semantics are important

Words matter. The wording that Golden Gate National Recreation Area (GGNRA) staff use sends messages both within the National Park Service (NPS) and to the public. I believe it is important for the NPS to be honest with the American people, who pay the NPS to manage their public lands. I request that the NPS change the following wording.

First, recreation management is fundamentally the management of people. In this case, the people are those who recreate with their dogs, and especially those who recreate with their dogs off-leash. Thus, the plan should be renamed to:

Draft Dog Owner Recreation Management Plan / EIS

This reminds the NPS and the public that it is people that are being managed, and people who are being affected by NPS management decisions.

Second, the NPS uses "park" as a shorthand for the GGNRA. The GGNRA is, of course, a national recreation area. It is not a national park, and it should be managed differently than a national park. Use of the term "park" mis-

represents the purpose and designation of this area. That is important.

The tendency for the NPS to inappropriately view the GGNRA as a national park is illustrated by the figure on page 9 of the NAU (2002) survey research report. The legend in that map refers to the lands as "Golden Gate National Parks."

Third, in the DEIS, the NPS periodically refers to the GGNRA "owning" lands. These are public lands owned by the American people, who have entrusted their management to the NPS. The NPS manages or has jurisdiction over these lands, but it does not own them.

Fourth, the DEIS uses "dog walking" as its default descriptor for recreating with dogs in the GGNRA. In my experience, there is a very significant difference between dog walking and off-leash recreation. Dog walking typically involves a leash and a walk around the neighborhood. Off-leash recreation, of course, does not involve a leash and typically involves recreation on public land. The NPS may desire that all recreation involving dogs in the NRA be on-leash dog walking, but the phrase is not appropriate as a descriptor of historical use in the area. I request that the NPS use an alternate phrase ? "recreating with dogs." This can incorporate everything from on-leash dog walking to off-leash recreation.

2. Mis-representation of the enabling legislation

It is my understanding that the enabling legislation for the GGNRA is as follows:

In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the recreation area, the Secretary of the Interior (hereinafter referred to as the "Secretary") shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area...

This is quite different from the NPS' stated purpose of the GGNRA (DEIS page 1):

to offer national park experiences to a large and diverse urban population while

preserving and interpreting its outstanding natural, historic, scenic, and recreational values.

It appears that the NPS has changed Congressional intent, and I do not see any rationale or legal foundation for doing so in the discussion of the enabling legislation (DEIS page 36). I request that the NPS provide a rationale for this change.

The DEIS preferred alternative may be consistent with the NPS' modification of Congressional intent, but it is not consistent with the enabling legislation.

3. Visitation is important

Outdoor recreation is important for many reasons, from physical and mental health to social bonds to connecting people to their public lands. The importance of recreation access to public lands has been recognized at the highest levels, with the February 2011 America's Great Outdoors report being a recent example. In their letter to the president, Secretary Salazar and others noted that "Americans care deeply about our outdoor heritage and want to enjoy and protect it." Not just protect it, but also enjoy it. The committee stated the specific goal of "Increase and improve recreational access and opportunities" (page 17). The steps outlined in the DEIS proposed alternative are directly counter to this goal.

The ability of Americans to enjoy their public lands is not only important to them as citizens. It is also important to the agency we have asked to manage our lands. Visitation strengthens public support for the NPS, and thus plays a critical role in the agency's legitimacy and ability to achieve its mission. Stephen Mather understood this well, and I encourage the NPS to remember it.

There has long been dog owner recreation on the lands comprising the GGNRA. These lands were transferred to the NPS with the understanding that this historical use would continue. Moreover, Congress clearly intended that the GGNRA serve a "parks to the people" function. The DEIS proposed alternative is inconsistent both with historical use and with Congressional intent.

The NPS accepted management responsibility for lands within the GGNRA knowing that federal regulation 36 CFR 2.15 existed and that numerous citizens visited these lands with off-leash dogs. If the NPS felt that off-leash recreation on these lands was inappropriate, it should not have accepted the lands into its system. Efforts to essentially eliminate this use undermine the agency's credibility as a manager of public lands.

I note that the NPS and the country as a whole has placed particular priority on getting youth outdoors. In America's Great Outdoors, there is a whole chapter

devoted specifically to youth. I believe there should be recreation areas where off-leash dogs are not allowed, in part because that is important for some youth and their parents. However, the converse is also true. For example, research in Oregon indicates that playing with dogs is a preferred outdoor recreation activity for both urban and rural youth. Based on my experience, this playing often is off-leash and involves public lands. The report can be downloaded at: http://egov.oregon.gov/OPRD/PLANS/docs/scorp/Youth_Focus_Group_Interviews.pdf

Franklin Roosevelt observed that "The fundamental idea behind the parks...is that the country belongs to the people, that it is in process of making for the enrichment of the lives of all of us." If this is true for the parks, surely it is even more true for national recreation areas. The steps outlined in the DEIS preferred alternative will subvert this idea that the country belongs to the people for the enrichment of all of our lives.

4. Inconsistency with purpose and need

The DEIS clearly states that "provide a variety of visitor experiences" is part of the plan's purpose and need (DEIS page 1). The preferred alternative is inconsistent with this objective, as it dramatically shrinks diversity in visitor experiences.

Recreating without a dog, recreating with a dog on leash, and recreating with a dog off leash are three very distinct experiences. Put differently, they are not substitutes for each other. Provision of diverse experiences is not only part of the plan's purpose and need; it is also a central tenet of recreation management for the past several decades. It is the backbone of the Recreation Opportunity Spectrum (ROS) and is Principle 5 (page 324) in Dr. Manning's text (see below).

The purpose and need section notes the importance of reducing controversy and conflict. The preferred alternative would increase controversy and conflict relative to the no-action alternative. The DEIS observes that past restrictions have generated these problems. Implementation of the quite dramatic restrictions contained in the preferred alternative will only exacerbate them. The key to resolving conflict is to provide desirable options for all historic uses, educate, and then enforce relevant closures. Efforts to suppress a popular use without providing desirable substitutes will increase, not decrease, controversy and conflict.

5. Need to adequately assess additional impacts

In the DEIS (pages 21-22), the GGNRA indicates that "Any change in energy requirements as a consequence of modifications in the number of vehicle trips to GGNRA resulting from the implementation of any of the alternatives would

be imperceptible." However, it is highly likely that implementation of any of the action alternatives would lead to increased vehicle trips to alternative sites, as access to opportunities for recreating with dogs in the GGNRA is constrained. I request that the NPS conduct a thorough evaluation of the impact of each alternative with respect to energy used by citizens obtaining opportunities that would no longer be available in the GGNRA.

In addition, I request that the NPS more fully evaluate the impact on other public lands in the region. By highly restricting a historic use of GGNRA lands, the NPS would displace off-leash recreation to other public lands. This impact should be compared relative to the no-action alternative, whereby the NPS can effectively manage, rather than displace, the use.

6. Use of good management principles

Dr. Robert Manning is a leading researcher in the field of outdoor recreation and the lead author of the most widely-used book in the field: *Studies in Outdoor Recreation: Search and Research for Satisfaction*. He is also director of the Parks Studies Laboratory at the University of Vermont. The National Park Service relies heavily on the research that he and his graduate students conduct.

Toward the end of *Studies in Outdoor Recreation*, Dr. Manning outlines several key principles and a fundamental recreation management framework. Principle 15 (page 326-327) notes that "Outdoor recreation managers should give explicit consideration to a variety of management practices rather than relying on those that are familiar or administratively expedient? Rationing use should be implemented only when other management practices are ineffective or not feasible."

Principle 10 (page 325) notes that "Outdoor recreation should be planned and managed within a rational, inclusive, transparent, and traceable framework." As noted in this section, the Visitor Experience Resource Protection (VERP) framework used by the NPS is one such framework.

The situation addressed by the DEIS affects thousands of people. They deserve to have the NPS follow good management principles. Based on communication with NPS staff, I understand that the NPS has conducted VERP processes at other NPS units in the region, including at Muir Woods National Monument and Alcatraz Island within the GGNRA, but it has not followed a VERP process in the context of dog owner recreation in the GGNRA.

I request that the NPS follow good management principles and processes by implementing VERP rather than simply relying on tools (access restrictions)

that are familiar and administratively expedient.

In other contexts, such as the 2007 Final EIS for winter use at Yellowstone National Park, the NPS has utilized adaptive management. If implemented well, adaptive management is an important and desirable approach to managing natural resources. However, the compliance-based management approach proposed for GGNRA is uni-directional and thus not adaptive. As described in DEIS pp. xiii-xiv, the GGNRA will only be adaptive in terms of further restricting access. Any steps toward further restrictions will be permanent. This approach does not reflect adaptive management or any other good management principle that I'm aware of.

7. Use of good science

According to the National Academy of Sciences, the NPS misused science in the case of the oyster farm at Drakes Estero. There is the danger the the NPS will again misuse science in the management of dog owner recreation on the GGNRA.

First, even if the results of the NAU (2002) report "Public Opinion Research Telephone Survey Regarding Golden Gate National Recreation Area Pet Management Issues" were valid, they would not be an appropriate foundation for restricting recreation with dogs. For example, the DEIS highlights (e.g., pages 279-280) the result that 22% of visitors reported that dogs being off-leash detracted from their experience and some respondents reported feeling uneasy or unsafe around dogs. This 22% is less than the percentage (27%) reporting that off-leash dogs added to their experience. In addition, the 22% was only of the 52% that had seen off-leash dogs. Of the 1,531 survey respondents who had visited any GGNRA site, only 174 (11%) reported that off-leash dogs detracted from their experience.

More importantly, 39% of respondents indicated that they did not see off-leash dogs. This is a reminder that it is possible for visitors to have experiences that do not involve off-leash dogs, as it should be. Some areas in the GGNRA currently allow off-leash dogs while some do not. This current mix of experiences is consistent with the DEIS' purpose and need of providing a variety of visitor experiences.

The fact that some (11%) of respondents reported off-leash dogs detracting from their experience reflects problems in GGNRA management, not problems inherent in off-leash recreation. One of two things presumably occurred for these people to have undesired experiences. First, they unknowingly went to areas where off-leash recreation is allowed, which reflects poor information provision by the GGNRA or poor information utilization by the visitors. Second, off-leash recreationists were in an area that currently does not allow off-leash recreation. This situation calls for better enforcement of existing

restrictions. Additional restrictions will only made this situation worse. In essence, the NPS is saying it should ban all RVs from national parks because I erroneously went to an RV campground and complained that there were RVs there, or because some RV drivers parked in a tent-only area. The solution is better management, including information and enforcement.

Moreover, the survey research suffers from a fundamental bias that makes it inappropriate for use in decision making. The researchers do a reasonably good job of addressing and discussing sampling and coverage error. However, they ignore measurement error, especially social desirability bias resulting from survey wording.

One would expect residents of the four counties to be aware of the NPS opposition to off-leash recreation in the GGNRA. By introducing the survey as connected to the NPS, the interviewers prime respondents to think about the NPS position with respect to off-leash access. Then, prior to asking opinions about off-leash access, it refers to "National Park Service regulations regarding dog leash laws at GGNRA sites" (question 10, page 44 of the report). That sentence alone would lead respondents to think that off-leash recreation was illegal. In case there's any doubt, the interviewers state that "current regulations?prohibit any off-leash dog walking" (question 11, page 45). By saying that an activity is prohibited, the interviewer primes respondents to oppose the activity and support the regulation.

With such leading questions, it's impressive that anyone supports off-leash recreation or opposes current regulations. It takes significant conviction to oppose federal government regulations, especially those coming from an agency such as the NPS, with national parks being viewed by the public as "feel good" parts of Americana similar to mothers and apple pie. Despite that pressure, 40% support off-leash dog walking.

Interviewers went on to state the GGNRA mission as (introduction to question 17, page 49):

the preservation, unimpaired, of the natural and cultural resources and scenic and recreation values of the park for present and future generations to enjoy.

As noted above, this mission is substantially different from the GGNRA's purpose in the enabling legislation, which reflects the intent of Congress (the elected representatives of the American people). I'm confident that responses would have been different if the interviewers had instead stated the following abbreviation of the enabling legislation:

to preserve outstanding natural, historic, scenic, and recreational areas for public use and enjoyment.

The effect of such leading questions is evident in the distribution of responses to question 13 and question 17. The questions are equivalent, with question 13 being preceded by significant priming to be consistent with NPS policy and question 17 being preceded by additional priming. Responses to question 17 indicate fewer "no opinions," less support, more opposition, and more strong opposition. In other words, the priming created by presenting the (NPS view of the) mission affected responses. One can reasonably conclude that "net support" (support minus opposition) would be greater if the survey followed good wording standards to avoid bias.

Measurement error is "perhaps the most common and most problematic collection of errors faced by the polling industry" (http://www.ropercenter.uconn.edu/education/polling_fundamentals_error.html). The significant measurement error in this survey renders results invalid as a scientific basis for decision making. I request that results from this study be removed from the DEIS. If results from such surveys is important in GGNRA decision making on this issue, I request that a scientifically-valid study be conducted.

Second, in *Studies in Outdoor Recreation*, Principle 6 (page 324) is "Outdoor recreation may be most appropriately considered in terms of motivations and benefits rather than participation in recreation activities and visits to parks and outdoor recreation areas." Benefits-based management represents the "best available science" in recreation management, and Dr. Manning expands on the benefits approach in chapter 7 of that book.

Following the principles of the National Environmental Policy Act (NEPA), and to achieve good management and the public interest, I request that the NPS more fully document, and quantify to the extent possible, the benefits from GGNRA visits that will accrue to citizens under each of the alternatives, including the no-action alternative.

Third, recent research conducted in Yellowstone National Park and other units managed by the NPS has highlighted trophic cascades and the role of inter-specific disturbance. All human activities (and all activities by other species) impact other components of the ecosystem. This does not mean that we will, as a society, treat all disturbance as acceptable. However, it provides a more honest reference point for discourse about acceptability. I request that the NPS document the historic range of variability, using pre-white settlement as a reference point, for the species discussed in the DEIS. In addition, I request that the NPS document the effect on those species of humans other than those recreating with dogs. This includes the effect of NPS actions. This provides an important context for discussions of the impact of people recreating with dogs.

Received: May,30,2011 17:43:26
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean,

My name is Deborah Roberts. I have lived here in Mill Valley, specifically Tennessee Valley, for 11 years. It is very important to me to be able to continue to take my dog off-leash to Muir Beach and the Miwok trail in Tennessee Valley. I am a very responsible owner. My dog is under sight and voice control at all times. We hike everyday on the Miwok in Tennessee Valley. It is my daily ritual! It truly is my backyard.

In the DEIS, there is very little reference to "recreational" uses. Recreation was a major priority in the establishment of GGNRA. Very little reference was made to recreational use. GGNRA was set-up for urban environment of San Francisco Bay Area. THE DEIS does not address a very important component, human recreational environment.

Walking my dog off-leash in these places is very important to my health and well being. I love being on the Miwok trail daily with Tesouro. We run and play together up and down the hill. As it is, dogs are already at the back of the bus at Miwok. This is only one of two trails of the dozens in Tennessee Valley that are dog friendly. If you take it away, you are taking away my daily recreation. You are not just removing us from the back of the bus but removing us almost all together!

I do NOT agree with the GGNRA proposal.

The DEIS fails to provide documentation or legitimate scientific studies that show that dogs are having a significant negative impact on birds and the environment. Without scientific proof that dogs, and not children or horses, are impacting the GGNRA in a negative way, it is unacceptable to deprive me of my recreational rights living here in this area I call home.

Thank you for considering and honoring my needs as I agree to have nothing but respect for the GGNRA as a responsible dog owner.

Respectfully, Deborah Roberts

Correspondence ID: 4012 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30,2011 Frank Dean, General Superintendent GGNRA Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am a 55 year old widow who lives in Noe Valley, San Francisco. I consider myself an environmentalist, and value the preservation of wildlife. I have been a member of several environmental groups, including the Sierra Club and I reject the Sierra Club's support of the current proposal to limit (and possibly ban - if there is insufficient compliance) off-leash dogs in the GGNRA. I am writing to oppose the GGNRA's draft dog management plan and protest it's unfair impact on single senior women who hike with their dogs for health. With a history of heart disease in my family, my physician has recommended hiking for exercise for physical and emotional health. I hike with my dog for safety. It is not realistic to think that I can do a vigorous hike on the slopes with my dog on a six foot leash. Implementation of the preferred proposals will result in my inability to continue with the health program recommended by my physician. I believe many other single senior women are in my position as well. In addition, I have talked to several seniors who get up in the morning and take their dogs to play on the beach. This constitutes not only their physical exercise but their social interaction as well. Prohibiting off-leash areas for these seniors who are not able (due to physical limitations) to hike with their dogs will deprive these individuals of their physical exercise and social interactions which support their health, happiness and longevity. (I noted that studies supporting these findings were completely omitted from the GGNRA Proposal report.) As a researcher and attorney who has reviewed the entire GGNRA Proposal, there are several problems with the GGNRA Proposal. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards

applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. I also am writing to register my complaint for the presentation of the information. I attended each of the public meetings and was shocked at the comments of the rangers in attendance, who indicated, after hearing my complaints regarding the quality of relevance of the research upon which the proposals were based, that even if the research was faulty, the proposals were supported by the anecdotal evidence of the rangers. Finally, I would like to understand why information regarding the cost of the GGNRA Proposal has not been made public. Thank you for your consideration.

Sincerely,

Judith Brown, Ph.D., J.D. San Francisco, CA

Correspondence ID: 4013 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:44:06

Correspondence Type: Web Form

Correspondence: I am writing in regard to the public comment of the proposed GGNR dog plan. As a San Francisco citizen, registered voter, biologist, conservationist, park volunteer, National Park donor and finally dog owner, I am profoundly disturbed by the NPF's DDMP. At it's best, the plan is a weak and flawed attempt to address a very small number of issues within a much larger & required management plan regarding the GGNR. Disgracefully, the DDMP attempts to do so by restricting some of the GGNRA's most numerous users and generous supporters. Even worse, it uses biased and misleading scientific data in the attempt to support the plan. I strongly endorse that the 1979 GGNRA dog plan remain as is and in favor of Plan A (no change) for all areas/resources until a more comprehensive and inclusive EIS/management policy for the entire GGNRA is designed. This following are just a few (of many) examples citing errors, problems, and incorrect data that has found within the DDMP draft by the NPS.

A. Recreation Area vs. National Park and rules governing such:

By definition of the 1972 charter, the GGNRA is not a National Park. Though the Secretary of the Interior & NPS has been charged to manage the GGNRA, attempts to impose NPS regulations-both land management and policy planning- on the areas is flawed and contrary to many goals listed to within the GGNRA charter. Policy and regulations specific for dogs and owners within GGNRA were established in 1979. It should be noted that

these regulations offered off-lease/voice controlled areas to dog owners in a small fraction (~1%) of the total area of the GGNRA. It is cited numerous times within the DDMP & Executive Summary that 1979 GGNRA dog policy did not comply with NPS regulations. This makes perfect sense ? as it is not a National Park. The GGNRA is a mosaic of lands largely embedded within a densely populated urban landscape. Much of the land has been developed through several urban-use iterations over the last 200 years, including military bases, railroad lines, public baths, ice skating rinks & private estates (among others). Most of the area's natural environment has also been transformed (intentionally & non-intentionally) by native and non-native plant/animal species. Almost none of these areas resemble the pre-European dune ecology that dominated the Western Coast of North America. Developing an Environmental Impact Summary (EIS) for such a diverse, complex and modified areas is without a doubt a challenging endeavor for the NPS. But the EIS must be specific for a National Recreation Area, with policy and regulations that reflect it's unique requirements. For example, fences and barriers are great & proven tools in the GGNRA to regulate traffic of humans and canines. Fences also can be used successfully to protect native plants and animals. In contrast, a national park ranger (SFSU DDMP open house) explained that fences in national parks had specific restrictions and had limited durations. Such an example highlights the needs for the NPS to develop policies and regulations specific to the GGNRA. In addition attempts to use cited data and studies from pristine wilderness areas or undisturbed areas of National Parks can be flawed and scientifically inaccurate ? but is done frequently within the current DDMP. In fact, several of the cited works don't accurately describe the data & the areas of study in the context of a dog or general EIS within the GGNRA. One of many examples can be found in pg.225 of the DDMP regarding " Alterations of Park Soils". The citation -Joslin and Youmans 1999, 9.3- is taken from a review from Montana Chapter of the Wilderness Society. Naturally, the review focuses on the subject of land policy more accurately described as Montana wilderness. But more importantly the citation actually does not include any actual data ? just a page & chapter in a review upon which the authors (Joslin/Youmans) cite other works. Even worse, the work was not published in a peer-reviewed journal. It begs the question if any/how many of the other cited works have any relevant data associated with development of a EIS for areas and ecosystems found within the GGNRA. A second example citing data from a study that intentionally manipulates readers toward a misleading & biased conclusion can be found on page 227. The cited study (USGS 2008, 12) refers to a USGS survey measuring baseline pesticides concentrations at 10 creek sites ? some of them located within the GGNRA. The data collected from this single study was no doubt an important first step "provide baseline information to enable evaluation of the need for future monitoring". But there is no data or method in this report to connect the low levels of Fipronil observed to any activity of dogs or dog owners in the area. So it begs the question, why is it in the

DDMP? A better application of this data would be found in comprehensive EIS study/plan of the GGNRA that included all the possible sources of the multiple pesticides sampled ? including residential and commercial use. The only possible conclusion of including this data within the DDMP is weakly attempted anti-dog rhetoric with no sound scientific basis.

B. Protection of Resources.

The DDMP plan goes to detail about the management of many different GGNRA resources, including plants and animals. It is impossible to comment upon all of the listed GGNRA resources within the DDMP. I will focus my comments upon one such resource that is a particular importance ? the conservation program of the Western Snowy Plover. This comment will be used as an example of how the DDMP has delivered a biased plan that improperly uses or ignores existing scientific data from multiple sources. The DDMP unfairly creates an illusion that the current canine management plan has had a large negative affect on the WSP population within the GGNRA. Worse still, it implies that further regulation is needed and makes an assumption not supported by scientific data the new regulations will improve WSP communities within the GGNRA.

There is no doubt that the protection the Western Snowy Plover is a concern toward any conservation plan involving costal habitat. The 2007 Western Snowy Plover Recovery Plan clearly defines its objectives as:

"The primary objective of this recovery plan is to remove the Pacific coast population of the western snowy plover from the List of Endangered and Threatened Wildlife and Plants by: (1) increasing population numbers distributed across the range of the Pacific coast population of the western snowy plover; (2) conducting intensive ongoing management for the species and Its habitat and developing mechanisms to ensure management in perpetuity; and (3) monitoring western snowy plover populations and threats to determine success of recovery actions and refine management actions "

The 2007 WSPRP also list the main reasons for declining WSP populations as: "Habitat degradation caused by human disturbance, urban development, introduced beachgrass (*Ammophila* spp.), and expanding predator populations have resulted in a decline in active nesting areas and in the size of the breeding and wintering populations."

The current DDMP drafted by the NPS uses the WSP protection plan as a reason to limit dog access ? both on and off leash ? in several GGNRA areas such as Ocean Beach and Crissy Field. The problem with the DDMP is that is does not address the most substantial threats to the Western Snowy Plover population in these areas. Though canine disturbance can be construed as a SINGLE aspect under the subject of "human disturbance" ? it is certainly

not the primary cause emphasized by the WSPRP (shoreline stabilization and urban development). Only a comprehensive plan including large-scale habitat restoration/protection, subsequent elimination of ALL intrusion into nesting/wintering areas (including people, canines, vehicles), as well as predation control (from feral and native species) can insure an honest effort in protection of WSP. As in other sections of the DDMP, the NPS attempts to manipulate and exclude data from recent WSP surveys (generated by the NPS) in attempts limit dog and dog presence in GGNRA, as well as generate positive public opinion for a weak and non-functional EIS. This type of false rhetoric from an agency tasked with managing resources is simply shameful. The DDMP claims that "Both on- and off-leash dogs are routinely brought into the WPA by park visitors, and are the greatest source of disturbance to western snowy plovers (Zlatunich 2009, 10)". Data presented in Tables 5, 6, and 7 from Zlatunich 2009 clearly provides evidence contrary to the DDMP statement. In the 11 hours of survey time (time with plovers present) reported in the Zlatunich study (conducted at Crissy field), there were 14 recorded incidents of WSP disturbances (Table 6). 79% (11/14) of these disturbances were caused by human walkers and runners. In addition, the number of humans within the 11hrs of survey (time with plovers present) numbered 398 vs 58 dogs (18 on leash/ 40 off-leash) ? a ratio of nearly 7 to 1. The data presented clearly shows that a large numbers of recreational humans are involved with the majority of WSP disturbances. In fact, only 1 of the reported 14 disturbances came from off-leash dogs. Table 7 reports a disturbance rate of 2.5% for off-leash dogs as compared with 3.6 % to walkers and 5.9% for joggers. A concerned citizen and WSP advocate such as myself begs to ask the question: How can the NPS's DDMP continue to blame off-leash dogs for WSP disturbances (at Crissy Field) when the data that they cite provides direct evidence that humans are the primary reason?

C. Compliance Based Strategy / Enforcement

Under the GGNRA DDMP compliance based strategy, "If noncompliance continues and compliance falls below 75 percent (measured as the percentage of total dogs / dog walkers observed during the previous 12 months not in compliance with the regulations) the area's management would be changed to the next more restrictive level of dog management". Furthermore the DDMP strategy is " designed to return impacts to a level that assumes compliance". No study or data provided in the DDMP shows that escalation to a more restrictive regulation of any area will reduce or return said impacts to a compliant level. It is alarming that the compliance strategy is designed to only increase restrictions, while not containing any flexibility to decrease restrictions within areas as needed. Why would such a strategy be designed with only a single, punitive direction resulting in more restrictions? Also, if such a compliance based strategy were adopted, how would it be enforced across some many areas with so many visitors? During

attendance to the SFSU DDMP open house, I was able to speak directly with NPS officers about the enforcement issues. Though I was not able to find within the DDMP plans of budgetary increases for enforcement efforts, I was told by a NPS officer that "some additional personal" would be included in the budget for enforcement. When I asked "how many" new enforcement personal would be available, the NPS officer replied "less than 5 new personal". I appreciate that fiscal/budget constraints will affect that actual number of NPS officers available for enforcement ? and the answer I received must be taken at face value as a spot estimate. But the simple fact that imposing more restrictive regulations across a wide area of GGNRA lands will result in many such areas falling into non-compliance. As per the DDMP designed strategy, non-compliance will cause even more restrictions to be implemented. With every new level of restrictions - enforcement efforts must be taken & enforcement resources must be allocated. This strategy also does not address the fact that a large percentage of the visitor population to the GGNRA areas are local pet owners. They are not going to simply stop visiting their local areas - nor abandon their pets. Increased restrictions will move them to other areas (GGNRA and others) that lack enforcement resources. In fact on page 270 of the DDMP policy, the NPS already concedes that " The enforcement of violations is not uniform. This is partly due to the size of the park and the inability of LE staff to be in many different areas at once". If the DDMP compliance based policy is moved forward as stated, and the amount of enforcement resources are not greatly expanded, how is this strategy deemed feasible? According to the NPS DDMP, enforcement of past dog and EIS policies have not been uniformly implemented. The recommendations for any new regulations across the entire scope of the GGNRA past the standing 1979 policy can only be looked at as an unenforceable strategy. The DDMP does include an actual, but limited data set regarding law enforcement data from 2007 and 2008. Though the data set includes only 2 years, the number of incidences involving dogs actually decreased from 2007 to 2008 from 1535 to 889, a decrease over 40%. It is interesting to note that the NPS does not comment on this drop in incidences, and its overall implications to the larger argument that more/new dog regulations are required.

Projected GGNRA Visitor Use:

The proposed DDMP makes the following statement in within chapters 1 (page5):

"Since the 1990s, the San Francisco Bay Area population and overall use of GGNRA park sites have increased, as have the number of private and commercial dog walkers. At the same time, the number of conflicts between park users with and without dogs began to rise, as did the fear of dogs and dog bites or attacks. The hours devoted by park staff to manage these conflicts, rescue dogs and owners, dispose of dog waste, educate the public

on dog walking policies and regulations at each park site, and enforce regulations also increased."

This statement seems at odds with other data presented within the DDMP and its predicted visitor policy. Page 290 states:

"As previously discussed in chapter 3, visitation to GGNRA is not expected to experience a significant increase in visitation over the next 20 years given the overall visitation trends to the park. Assuming there are no major changes in park boundaries or facilities, park visitation would range between 12.5 million to 16 million people annually, similar to how it has been operating over the previous 20 years. Therefore increased visitation to GGNRA should not result in cumulative impacts to GGNRA resources. "

Figure 5, page 267 shows data reflecting number of visitors to GGNRA. Interestingly- at the time of the current 1979 dog policy, visitor numbers were recorded at ~12 million/year. According to this data, visitor numbers greatly increased during 80-87 period to ~ 22 million/year. During the last 20 years, visitor numbers seem consistent at running around 15 million/year, a much closer number of visitors to when the 1979 policy is adopted. Data from the US Census Bureau clearly agrees that population of San Francisco and the surrounding Bay Area is growing, and that pet populations most likely have grown as well. As a reader of the plan, I am confounded with the statements within the DDMP. If NPS acknowledges that the local population is increasing, and visitors to GGNRA is also increasing, how is the DDMP/NPS not predicting increased impacts on GGNRA resources? Even worse, how can they claim that new dog regulations need to be adopted, if park visitation is predicted to be fairly constant, and there will be no impacts on GGNRA resources. Another argument can be made that as both the human and dog population of the Bay Area increase, the GGNRA resources available to them should also increase. The original charter for the establishment of the GGNRA states that " in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning". As the urban environment/population increases ? so should the GGNRA resources that service them. Under this interpretation, the NSP should be developing strategies to increase areas available for both on and off-lease dog use. This was listed as of the the primary issues within the executive summary : " needs of urban residents " pg. iv. This is clearly not being considered within the current DDMP.

Public Participation / Involvement of GGNRA Regulations

Perhaps the most striking feature about the proposed DDMP was the fact that local citizens (including dog owners) were not able to participate in regulation drafting. By leaving out & not actively working with the local public population, the NPS created a DDMP that ignores the needs of very

people who most often use the GGNRA resources. The DDMP does include a background (though biased) on the construction of a dog management/EIS plan. The NPS efforts in 2004- 2006 to implement the Negotiating Rulemaking act and form a "neutral party" (the Negotiated Rulemaking Committee) to help draft a dog management plan was by far the best effort to include the local public in design regulation. The NRC actually contained representatives from a variety of different interest groups. The DDMP states that the NRC was able to reach consensus "on nine guiding principles, guidelines for commercial dog walking, and a site-specific alternative for Oakwood Valley (Marin County)." The NRC failed to reach consensus of other issues - "special regulation for dog management at GGNRA". As mentioned, any EIS or management strategy for the GGNRA will include a complex process. The NPS seems to take the opinion that the NRC failed in it's goals, and now must act alone in developing a draft ruling. This is a short-sighted & incorrect view of the data, as well as not being responsible to the public interest in which the NPS exists to serve. The NRC did reach agreements for some issues, and provide a very important communication between public needs and the NPS. This type of negotiating system must continue to be implemented if the NPS is serious about drafting a comprehensive EIS (including dog policy) policy that can be successfully implemented. This may take more time and communication between the public, but makes the difference between success and failure. It is important to note the increased communication between the NPS and GGNRA users was one to the central areas for improvement reported by Dr. Nina Roberts in 2007. Though the main intent of Dr. Roberts work was sullied in the DDMP by using only 1 isolated quote in regards to dog use in the GGNRA, one of it's central themes regarding the need for communication between all the diverse people who use GGNRA rings true. Perhaps members of the NPS should reread Dr. Roberts work and take heed on what the needs of the people are involving the GGNRA ? I can assure you that the focus is not regulating dogs in GGNRA It should also remind the NPS that communication requires parties that listen to each other as well as an active and balanced discussion. Dictating or imposing regulations on others will not provide for a successful communication strategy to the public.

With these comments in mind, I strongly support Plan A for all GGNRA sites and resources. It would be my intention to dismiss the NPS proposed DDMP draft, in favor of designing a more comprehensive EIS that includes all of the issues the required for a successfully and balanced management plan across the GGNRA. The decision to abandon the current proposal is based on the reoccurring bias and scientific errors endemic throughout the entire proposal. I would look to the NPS to reinstate a more comprehensive and inclusive communication with to general public to aid them designing such a plan.

Regards, Scott Stawicki San Francisco, CA 94114

Correspondence ID: 4014 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:46:58

Correspondence Type: Web Form

Correspondence: May 30th, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean,

I'm afraid our city is going to lose every place a dog can run. As a non-canine walking person, I enjoy watching dogs in their element, It is nothing short of poetic.

Best regards,

jj San Francisco, CA

Correspondence ID: 4015 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:47:09

Correspondence Type: Web Form

Correspondence: I am writing regarding the proposal for change in use for dogs in the GGNRA. I have read the proposed plan and attended your public information session at lake merced and have concluded that this proposal is regressive and discriminatory.

I say this based on several observations. 1) applying the same use requirements as NPS land does not align with the size of the GGNRA areas in question nor to their proximity to urban environments. I can see that on the human use side, you have made concessions to accommodate this, but are not doing so in the same way with dogs. 2) The proposal goes straight from one community-based, mixed use model to the new model without any exploration of measures to make off-leash dogs compatible with the other objectives of the recreation areas, such as fencing and other barriers that have been acknowledged by NPS and other environmental groups to be effective. Your proposal simply says no. how can you expect people to trust your policy if you do not make any earnest attempt at compromise or mitigation before proceeding to restriction and exclusion? 3) Your proposal seems to place all of the responsibility for impact to wildlife on un-leashed dogs without comprehensive, un-biased studies which point to this conclusion. I am not a scientist, but I do operate in a world where data are included as part of the decision-making process. The few reports you did include point to human impact (snowy plover at crissy field, for example) as having the highest disturbance rate, yet I see nothing in the plan which is

aimed at restricting walkers, runners, messy picnickers (whose trash we pick up when walking our dogs) cyclists, skaters? 4) You provide zero data, suggesting there has been zero work done around the effectiveness in wildlife protection based solely on the removal of off-leash dogs while human use continues unfettered. Until you can show multiple cases of this targeted restriction creating positive change for the ecosystem in question, it shows only a course towards outright discrimination.

In conclusion, as an environmentalist, active citizen, dog-owner and voter, I have to describe the proposal as exclusionary, biased, arbitrary and misleading. With so much pristine land that can and should truly be treated with the special care and oversight it deserves, I cannot understand why you are adopting this approach and applying these resources to areas that will never achieve anything close to the splendor or ecological importance of places like Yosemite, Yellowstone, Mt. Lassen and so many others that desperately need your vigilance and diligence in orchestrating their preservation. Please dismiss this discriminatory attack on the community that treasures the GGNRA as it is and re-prioritize policy and enforcement in the places that will benefit future generations the most.

Thank you, Sarah van ness san Francisco, CA 94114

Correspondence ID: 4016 **Project:** 11759 **Document:** 38106
Received: May,30,2011 17:47:47
Correspondence Type: Web Form
Correspondence: GGNRA:

First, I am strongly opposed to GGNRA's inclusion of a many cultural resources in the DEIS when, simply-stated, many of these cultural resources are not within the dog-walking areas and some of the "negative activities" cited in this section cannot be attributed to dog-walking activities.

In addition, I am strongly opposed to the GGNRA's Preferred Alternatives for the dog-walking area of Fort Funston, in specific, and moreover opposed to the general reduction of off-leash walking areas in all of the GGNRA sites.

Discussion about Chapter 3: Affected Environments In general Chapter 3: Affected Environment, the DEIS overstates the cultural resources that are affected by the Chrissy Field and Baker Beach dog-walking areas. Below are listed 4 examples:

- In referencing Chrissy Field the DEIS states "original buildings-hangars, barracks, guardhouse, etc." are included in the "Affected Environment".

Most of these structures are located on the south side of Mason Street, geographically located across the street from the dog-walking boundary and in visits to the hangar areas of Chrissy Fields, dog-walking is not an activity found in this area where public and retail-oriented spaces are surrounded by parking areas.

- In reference to "Fort Winfield Scott" section of the DEIS, this section should be renamed to "Fort Winfield Scott Seacoast Fortifications" or entirely removed to itemize only embattlements that are contained within the Baker Beach dog-walking areas. In addition these fortifications should be itemized within the text and on the map in a consistent manner, and the "damage" that is caused by dog-walking activities to these fortifications should also be realistically discussed.

- In addition, the mention of "headquarters" in the text of Fort Scott implies that the "campus" including the headquarters building, barracks buildings and parade grounds are part of the DEIS area of concern. These cultural resources are geographically distinct from all of the dog-walking areas included in the DEIS. The reference to the "headquarter" should be re-written clearly.

- In referencing Chrissy Field, the DEIS states that "vandalism" is regularly occurring at this site. I find it difficult to believe that this "vandalism" should be attributed solely to dog-walking users of this site.

Discussion about GGNRA's Preferred Alternative at Fort Funston The Preferred Alternative and Alternates B-E at Fort Funston

-reduce the amount of off-leash areas to an unacceptable amount of gross area for the amount of users and dog-walking activities that occur there.

-reduce the amount of off-leash areas to an unacceptable amount of gross area for users that cannot physically walk down to the beach.

-limit (severely) the dog-walking areas when the beach is closed for various incidents like water contamination (i.e. similar to closure at the time of Busan Oil Spill) or more often, high-tidal water levels when the beach is not useable.

-limit the dog-walking areas to such a small gross area will most likely cause a rise in dog-related negative incidences, that no user nor park personnel would find positive.

I would like to recommend Fort Funston ALTERNATE B with the following modifications:

-At the intersection of the (Coast Trail, Beach Access and Sunset Trail), and heading north, limit this area to non-dog-walking activities for the protection of the Bank Swallow and for users that are not comfortable with dogs.

-North of that intersection (Coast Trail, Beach Access and Sunset Trail) provide a second smaller parking area and accessible trail with signage noting dog walking is permitted at the southern parking area.

-Provide clear signage in both areas of expectations and reasons for the rules. In the 8 years I have been using Fort Funston there have been no rules posted at the parking area of Fort Funston.

Discussion about GGNRA's General Reduction of Off-Leash Walking Areas Reducing the amount of open space for dog-walking activities is a punitive approach to current off-leash walking practices. The community was promised that the GGNRA lands would be maintained for its urban dwellers, and as a part of San Francisco blended community, the dog-friendly members are disappointed by the GGNRA's negative approach. I believe the system in-place is working (on many levels) and could work better if smaller, more localized strategies were undertaken to preserve cultural resources, landscape and wildlife habitats. Simply reducing the cherished dog-walking areas, throughout the Bay area for the sake of corresponding to Federal guidelines, is a waste of the positive efforts of the GGNRA.

Thank you for allowing this forum for comments and concerns.

Anne Marie Kuban

Correspondence ID: 4017 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:47:51

Correspondence Type: Web Form

Correspondence: I live in the Fairway neighborhood that borders Mori Point. I have spent many hours enjoying the scenery, hiking on the trails, and walking my dog. I walk my dog along the trails in Mori Point at least twice a week. My neighbors are the most frequent users of the area; we have a strong interest in keeping the area pristine. I want to be able to use the area for years to come. I am in favor of any plan which:

1. Permits dogs on all trails and roads within the GGNRA, and especially the Pollywog Trail in Mori Point. I have been walking dogs along the Pollywog Trail, Old Mori Point Road, and down to the beach for the twenty two years that I have lived in the neighborhood. I adore that walk and it is

one of my favorite parts of living in this neighborhood.

2. Requires dogs to be leashed everywhere within the GGNRA. The Mori Point area is frequently used by dog walkers, hikers, and bikers. Requiring dogs to be leashed is the best alternative to maximize visitor enjoyment and minimize conflicts.

3. Contains no restrictions or permits for dog walking within the GGNRA. This would require too much management and would be difficult for visitors to comply with.

4. Contains no poison pill which would permit the GGNRA to outlaw dog walking due to noncompliance. It is patently unfair to have a plan which allows the rights of law abiding dog walkers to be dependent on the compliance of other people.

Thank you for your time and consideration.

Correspondence ID: 4018 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:49:28

Correspondence Type: Web Form

Correspondence: My partner and I have two small Havanese dogs that we have taken to various off-leash areas around the city - mostly on the beach along Crissy Field and the beach in front of East Beach parking, when there are not many people unaccompanied by dogs present on that beach, but also on the grassy area of Crissy Field for Havanese Meet-Ups and when riding bikes with a trailer for the dogs past that part of the Crissy Field area. We also have been off-leash in Alta Plaza Park, Lafayette Park and Alamo Square Park as well as Fort Funston and appropriate areas of Golden Gate Park. It is one of the most thoroughly enjoyable activities for us and for our dogs here in the City. We recently moved here - May 2008 - and the perceived and actual dog-friendliness of San Francisco is one aspect of the City that we share with friends and family across the country. It is a true drawing card for travelers to the Bay Area, imho, and, therefore, likely beneficial to the local economy. The proposed reductions to off-leash areas fly in the face of this important character of life in San Francisco, imho.

I also have reviewed and heard comment on the supposed environmental impacts and these seem based on scant facts or authentic research (I am an educational researcher and am also familiar with key methods of both environmental research and relevant public policy research). There seem to be few truly tested proclamations about environmental impact throughout the report. My own experience on Crissy Field is that while dogs and their owners virtually never get in the protected dune areas of the beach I *often*

see people unaccompanied by dogs laying out blankets and/or having a picnic or otherwise sitting in the designated protected areas, even when there are few if any other people or dogs (for that matter) on the beach (so that there are plenty of opportunities to sit on the beach properly unbothered - it seems simple to be a preference of folks to sit among the protected dunes). I say this to point out that I have witnessed far more instances of *people* violating protected areas at Crissy Field and elsewhere and very, very few instances of a stray impetuous dog trespassing in these areas.

Please do not reduce the off-leash areas which are currently just a minimal part of the overall GGNRA. It is a *recreation* area not an endangered habitat area. And dogs and their owners are among the most protective of and respectful of the park lands in question.

Correspondence ID: 4019 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: 5/30/11 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city

regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely,

Gretchen Lan San Francisco, CA 94122

Correspondence ID: 4020 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:53:09

Correspondence Type: Web Form

Correspondence: Please eliminate any restriction of the off-leash areas in the GGNRA plan. As a parent of young children and a dog owner,keeping Fort Funston and portions of Crissy field as official off-leash areas is essential to my ability to enjoy the San Francisco Coast line with my family. Our dog is young and needs to run and socialize as much as my children do. Fort Funston and Crissy Field are an essential part or our recreation enjoyment in the city. Please preserve or increase the off-leash areas in the GGNRA. Thank you.
Dawn Silberstein

Correspondence ID: 4021 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:55:26

Correspondence Type: Web Form

Correspondence : Mr Dean, I find much to object to in this flawed and biased report. When one considers how much evidence this report is lacking and how many other studies show contrary facts, I can not help but conclude this report is prejudiced against dogs and discriminates against dog owners. Please read the following that I have collected.

1) There is no scientific consensus that offleash dogs have a significant impact on bird and wildlife populations. A recent study by Forrest and Cassady St. Clair (2006) (see below for citation information) studied diversity and abundance of birds and small mammals at 56 sites in urban parks in Edmonton, Alberta. To their surprise, they found that whether a site was on- or off-leash had "no measurable effect on the diversity or abundance of birds and small mammals. Indeed, they said, "wildlife, particularly birds, in suburban and urban areas exist there because they are fairly tolerant of moderate levels of human activity."

2) The GGNRA's own studies indicate that dogs have no significant negative impact on the population of snowy plovers at Ocean Beach, The Nov 15, 1996 report of snowy plovers by GGNRA staffer Daphne Hatch found that there was an increase of more than 100% in the number of snowy plovers in

the years after the 1979 Pet Policy went into effect (allowing offleash dogs on Ocean Beach and elsewhere). There was no negative relationship between the number of dogs and the numbers of plovers on the beach at the same time. Indeed, the 1996 Hatch Report says: "Factors other than the number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach."

3) The GGNRA's own data indicate that there was no negative impact on plover abundance after the court rulings reinstated the 1979 Pet Policy allowing dogs offleash on Ocean Beach. Indeed, the numbers actually increased. A follow-up 2006 Hatch Report considers effects on the numbers of plovers after two Federal Court rulings reinstated the 1979 Pet Policy, allowing offleash dogs back on Ocean Beach. According to the study, the maximum number of plovers ever recorded was in 1994, at a time when there were no restrictions on offleash dogs on Ocean Beach. Numbers of plovers have varied since then, (from a low of 14 in 2000 to 35 in 2005), but there is no correlation between when numbers of plovers were low and when dogs were allowed offleash. Over the same time period, similar changes in plover populations have been seen at Half Moon Bay State Park. At that beach, there was once a maximum of 60 plovers, but there are currently only 25-30 present. This decrease cannot be blamed on dogs since dogs are not allowed on the beach at the state park at all, even onleash. Clearly any decreases in plover populations in recent years are unrelated to whether offleash dogs are present or not. Indeed, data from the 2006 Hatch Report posted by the GGNRA on its website actually show an increase in plover numbers in 2005, the year after the first Court Ruling. The annual mean of snowy plover numbers (total number of plovers observed during all surveys in a year, divided by the number of surveys done that year) show an increase in plover populations after the Court rulings (from 26.55 in 2004 to 31.30 in 2005). The annual snowy plover median listed (the number of plovers counted in a single survey, with half the surveys counting more plovers than the median number and half the surveys reported less) is 28 for 2004 and 33 for 2005.

4) People without dogs pose an equal "risk" to plovers, yet there is no attempt to restrict their access to the plover areas. Unable to prove any impact on plover population numbers, the 1996 Hatch Report argued that dogs "disturb" plovers. However in the entire 1.5-year study, only 19 out of 5,692 dogs -- less than one-third of one percent -- were observed deliberately chasing plovers, and none was reported to actually catch or harm a bird. The report adds that on another 15 occasions, at least 100 additional plovers were "inadvertently disturbed" by dogs, comparing this to the 48 plovers inadvertently disturbed by people without dogs, implying dogs inadvertently disturb plovers at least twice as often as people alone. But a closer reading of the report shows that the disturbances from people were noted in about half the recording time (24 hours of observations) as that devoted to studying dogs (40 hours). Had the two groups been observed for equal amounts of

time, the number of disturbances would have been nearly the same. Yet there are no proposed restrictions on people without dogs who walk or run through the plover protection areas.

Note that in the 2006 Hatch Report, an incident is classified as a "disturbance" when, in response to an offleash dog, a plover lifted up its head and looked around. This overreaching and misuse of the term "disturbance" illustrates the bias inherent to the Hatch observational studies.

5) The Federal Government cannot make policy decisions (such as this proposed closure) that are based on assumptions that have no hard data to back them up. The assumption that any disturbance of plovers or other shorebirds causes significant problems for the birds is repeatedly stated as fact. However, even the 1996 Hatch Report says that "Little research has been conducted on the energetic effects of disturbances, and on whether individuals can compensate for this lost energy intake and increased energy expenditure." One recent study, conducted as part of a Senior Research Seminar at UC Berkeley did test the commonly repeated assumption that recreational disturbances changed the feeding behavior of snowy plovers. Megan Warren (2007) found no significant relationship between feeding behavior and direct disturbance by people recreating on the beach. "The Crissy Field study did not provide any relevant results, however, the data from the two Point Reyes study sites do not support the hypothesis that western snowy plovers in more heavily disturbed areas devote less time to actively foraging and more time to being alert." What other often-repeated assumptions about the effects of disturbances on plovers and other shorebirds will be similarly disproved when studies are done that put them to the test? Do we really want to restrict an entire class of people based on unproven assumptions?

6) The studies of offleash dogs in the GGNRA do not consider "real" threats to plovers from natural predators like ravens. Offleash dogs may be more likely to chase ravens, a natural predator of plovers, because the ravens are so large. Thus the presence of offleash dogs may keep ravens away from plover areas. This is one possible explanation for why the numbers of plovers increase when offleash dogs are present.

7) If the GGNRA was sincere about protecting plovers, they would put up "temporary" fences to keep ALL park visitors out of the plover protection areas, not just people with offleash dogs. To restrict only one class of park users and not others who have similar "effects" is discriminatory.

8) The GGNRA has not taken any other action to protect plovers, despite clear opportunities to do so. During the recent Cosco Busan oil spill, the GGNRA quickly erected floating booms to keep oil from entering the Crissy Field lagoon at the eastern end of Crissy Field, yet made no attempt to

similarly protect the plover area at the western end of the beach. The oil posed a significant risk to the plovers, yet the GGNRA did nothing to protect them from it. Indeed, oiled plovers have been reported in the GGNRA. The GGNRA has allowed sporting events like the 2006 Turkey Trot to proceed, with the result that at least 1000 people (more likely 1500) walked or ran through the plover protection area on Ocean Beach. Park rangers routinely drive four-wheel drive cars and trucks through the Ocean Beach plover protection area while pursuing people with offleash dogs. During Fleet Week, the plover protection area at Crissy Field is filled with people watching the air show, with no restrictions or protections in place. Dead sea mammals are left on beaches, encouraging natural predators of plovers like ravens to come to the beach.

9) The GGNRA should focus enforcement on offleash dogs who actually do chase plovers. Banning an entire class of people (those with offleash dogs) from the area because of the actions of a very few is discriminatory and does not offer the plovers any significant increase in safety. In order to ticket people with offleash dogs in the plover protection areas, Park Rangers will have to be present at the sites. They could, therefore, easily cite people whose dogs chase plovers (the few) and leave those people whose dogs ignore the plovers (the vast majority) alone.

10) Even if the restriction is justified, the area closed at Ocean Beach is much too large. The plovers are located down by Noriega St, and yet the area closed begins near Lincoln, nearly six city blocks farther north. A similarly large buffer zone is claimed at the southern end of the plover area. The buffer zones are too large and should be shortened.

Scientific Citations: 1) "Effects of dog leash laws and habitat type on avian and small mammal communities in urban parks," Andrew Forrest and Colleen Cassady St. Clair, Urban Ecosyst (2006) vol 9, p. 51-66 2) "Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover", Megan Warren, UC Berkeley Environmental Sciences 196, Senior Research Seminar, May 7, 2007

Sincerely a concerned and responsible dog owner, Patricia Sambrailo

cc to U.S. Senator Diane Feinstein:

<http://feinstein.senate.gov/public/index.cfm?FuseAction=ContactUs.EmailMe>

U.S. Senator Barbara

Boxer:<http://www.boxer.senate.gov/en/contact/policycomments.cfm>

Congresswoman Jackie Speier:

<http://speier.house.gov/index.cfm?sectionid=159§iontree=163,159> (If

you live from Moss Beach north)

Congresswoman Anna Eshoo:

https://forms.house.gov/eshoo/webforms/issue_subscribe.htm (If you live from El Granada south)

National Park Service Director Jon Jarvis: Jon_Jarvis@nps.gov

State Senator Leland Yee:

<http://lcmsubcontact.lc.ca.gov/PublicLCMS/ContactPopup.php?district=SD08>

San Mateo County Supervisor Don Horsley: dhorsley@co.sanmateo.ca.us

Correspondence ID: 4022 **Project:** 11759 **Document:** 38106

Received: May,30,2011 17:58:56

Correspondence Type: Web Form

Correspondence: Please leave things as they are. Many people enjoy Fort Funston, Crissy Field etc. with their dogs. Many families, many old people seniors, many people of all ages and ethnic groups. We like to play fetch, we like to jog, we like to let dogs play with dogs - none of these are possible on a leash. Please let us keep these tiny, tiny pieces of the recreation area - given to the park service years ago on the condition that existing uses, such as playing fetch off leash, be continued. There is no where else to go in San Francisco. I have a small child and I can say with authority that there are already plenty of places to bring a child where dogs are not allowed. We need to keep a few for the families, seniors and other people who want to enjoy recreation with a dog. Otherwise all these people will be swarming the small parks and the soccer and baseball fields. Many places are already set aside for native plants and birds. Please make this plan go away. Thank you, Megan Smith, Little League and soccer mom and dog owner, Fort Funston user, San Francisco resident .

Correspondence ID: 4023 **Project:** 11759 **Document:** 38106

Received: May,30,2011 18:00:32

Correspondence Type: Web Form

Correspondence: I have lived in Marin County for 25 year, always with 1-2 large dogs that need opportunities to run as well as walk. I have regularly taken my dogs to Homestead Valley, Alta Trail, Muir Beach and Crissy Field. All my dogs have been under voice control. Exercising my dogs in ROLAs is an important component of my own physical and emotional health.

I don't think the proposed alternatives are at all balanced for multiple use or by county - they distinctly lean toward restricting the most frequent/greatest number of users in many areas, with Marin having nearly all its ROLAs eliminated. Have you ever done a usage survey? In the areas I mention above and others, off-leash dog walking (and dog swimming) is the recreational usage for at least 50% of all visitors, probably more than that for some areas. Does the R in GGNRA not stand for recreation? How can you call a plan that eliminates a majority recreational use "balanced" for visitors?

I also don't buy the vague "potential threat to wildlife" canard - I also use a dog park in Mill Valley that co-exists with blue herons, killdeers, snowy egrets, pelicans, Canada geese, and many other types of birds. When we were first dedicated the land some 20 years ago, Audubon representatives protested, citing the "potential threat" argument. But all the avian populations have flourished except when sickened or killed by human-caused pollution: sewage, oil and other toxic spills.

I have not read the 2,400 page document but have been told that it fails to provide documentation based on scientific studies that show that dogs are having a significant negative impact on birds and the environment, and that this impact is solely caused by dogs and not other factors. There will always be some irresponsible dog owners and I fully support laws that target them, just as I do for irresponsible gun owners, irresponsible drivers, etc. But we don't take away privileges from a huge segment of the population just because of the few, and that shouldn't be the case here either.

Correspondence ID: 4024 **Project:** 11759 **Document:** 38106

Received: May,30,2011 18:02:24

Correspondence Type: Web Form

Correspondence: The NPS has been too lenient regarding dogs in GGNRA, and should not fear a public backlash mobilized by a vocal minority. Strong restrictions are necessary to enable everyone to enjoy and preserve the precious landscape. Without care the habitat will disappear, and if this occurs, future generations will lament that we prioritized short-sighted, selfish dog walkers over an irreplaceable ecosystem, while interfering with citizens' ability to peacefully enjoy nature.

Very few dog handlers demonstrate an attitude of responsibility and consideration, and instead are just as aggressive and intrusive as their dogs. I cannot fully enjoy walking at Crissy Field or Land's End because I have had many unpleasant interactions with dogs and their inconsiderate owners. I have been hit hard in the back by catapulted balls, been shocked when a

large dog jumped from behind onto my hips and legs, felt scared when another dog jumped on my legs and closed its mouth around my fingers, and have repeatedly dodged whirlwinds of dogs chasing each other. I enjoy well-behaved dogs in appropriate places, and in the past owned a wonderful, trained dog, but do not invite interaction with strange dogs. Every time a dog aggressively approached me without my beckoning, I politely, yet firmly, confronted the owner, and each time I was met with incredible rudeness. I have never encountered a ranger around the time of the incident to report the interaction.

It is only a matter of time before someone, perhaps a child or elderly person, is seriously hurt by a dog on government property, which may beckon legal action against the NPS. I do not want our tax dollars to go towards defending lawsuits because the NPS did not take responsibility towards the general public, and instead allowed dogs to run loose. The NPS must protect both the habitat and the general public, not pet dogs' ability to run wild on precious land.

I have witnessed dogs burrowing deep holes behind restricted, fenced areas, run freely in the snowy plover habitat during nesting season, chase seabirds fishing close to shore, as well as audibly disturb the landscape, which may drive wild animals from their habitats. Many dog walkers either do not care about those around them, or cannot control their charges, particularly when they take many canines out at once. I do not understand how the unboundaried play of dogs should be allowed to override the deep enjoyment of people relating with nature, which for many serves as a precious escape from the pressures of urban life.

Most of the anti-leash lobbyists are misguided about dog pleasure. Canines are pack animals who require a strong leader; when living with humans, every professional trainer will state that the leader should be the person, and that trouble arises when the dog believes that it can dominate people. Dogs are happiest when they know their boundaries, for this replicates the hierarchy found within canine social structure. Most of the dogs on GGNRA land are not well-trained; they jump on strangers, do not respond to voice command, do not heel, and have to create hierarchy with every interaction, and too often assume that they are dominant over strange people. This causes stress for the innocent person going for a walk, as well as for the dog, and ultimately for the environment as well. For those who believe that dogs need free interaction, large play areas should be created on less sensitive habitat, and away from where regular walkers wish to clear their heads and enjoy nature.

It is a relief to walk on the Peninsula and in the East Bay, where dogs are either prohibited or where their behavior is restricted. Throughout the Peninsula Open Space area and at Tilden Park, for example, very clear and

numerous signs create a workable rules of engagement for the places that dogs are allowed. These local governments do not seem inhibited about restricting where dogs are allowed, and under what conditions they may come. Why is the NPS more timid than these local governments? The misguided 'freedom' that is plaguing the GGNRA stands in sharp contrast to western Europe, for example, where it would be inconceivable for dogs to harass strangers in parks and on wildlands, at peril to the habitat.

It is simplest and ultimately best to follow the example of the Peninsula Open Space and many other federal lands, which is to prohibit dogs in most areas. It will be too difficult for the NPS to enforce complicated and subtle rules. Too many owners have a sense of entitlement at the peril of the world around them, and until our pet culture changes to one of consideration, dogs should not be allowed to run unleashed on GGNRA lands. This may be a case of where a few bad handlers ruin the situation for everyone else, but in my copious experience, it is on every occasion I venture out that I witness a dog destroying habitat or interfering with a citizen's peaceful enjoyment of the land.

Correspondence ID: 4025 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979" Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

Let me explain. My partner and I have two small Havanese. We routinely walk them in off-leash areas of Crissy Field. Mostly in the stretch of beach that I believe will still be available for off-leash, but also on the beach directly in front of East Beach parking when there are not large numbers of people unaccompanied by dogs - especially in the winter months when virtually no one beside owners with dogs are even bothering to use the beach. Further, we enjoy the grassy area of Crissy Field.

I have to say that rather than being bothered by the presence of dogs we and our dogs have been stopped on countless occasions with people - both locals and tourists - proclaiming how happy they are to be able to come to an area where they can enjoy the outdoors AND the presence of dogs (sometimes they are dog lovers who live in apartments where no dogs are allowed, so they come to the beach for their "dog fix"; other times tourists have spoken wistfully of their canine friends left at home and express appreciation for an opportunity to be reminded of them and to see dogs so well-integrated into

the social life and recreational environments of the City).

When so very little of the overall area of the GGNRA is devoted to off-leash opportunities, why reduce these few, well-utilized, respectfully-utilized and appreciatively-utilized park areas? Upon review of the impact report there seem to be virtually no really thoughtfully researched or factual accounts of adverse environmental impacts of these off-leash areas. It seems like it is a "policy for policy's sake" or a desire to force the San Francisco park lands into alignment with other park lands nationally without taking into account the unique character and social/recreational opportunities these areas afford our City.

Correspondence ID: 4026 **Project:** 11759 **Document:** 38106

Received: May,30,2011 18:11:38

Correspondence Type: Web Form

Correspondence: Thank you for listening to my contribution and input on the policy regarding dogs in the open space area of the GGNRA. My thoughts are guided by being an outdoors person for many, many years. I have also worked as a naturalist and conservation specialist in the GGNRA ? Fort Funston, as well as led groups of young people and adults in the outdoors rafting and hiking adventures.

Here are a few ideas and suggestions for why on-leash/off leash dog policies are for better for the community:

1) Recruiting Future Stewards of the Outdoors - As a life-long advocate of the environment and an outdoor educator, I believe it is important to get as many people as we can into the open space, enjoying and appreciating all it has to offer. Children and families that have a family dog want to bring it with them to the open space. The no dog policy will eliminate their ability to fully appreciate our parks and those children will never know the value of keeping and preserving our parks.

2) Public Health Value - At a time when obesity is at epidemic level and free or low cost recreational opportunities for children and families are going away, the parks serve as one of the best venues for life-long health and fitness. Dogs help us to get outside and move. Therefore, if the parks allow dogs, people will get outside and walk with them and get the exercise they need. Families with dogs will have a much better level of health and fitness.

3) Safety ? I am a woman who walks all times of day (and sometime evenings) without another person with me and I feel I need my dog with me. If dogs were banned, it would make it more challenging and would take

away my access to the parks. This past week my partner was stalked and chased by a coyote in the Rancho. It was snarling, yapping and came within five feet of her. Her dog stood between her and the coyote. At times like these, woman's best friend can be a great deterrent.

ROLAs (Regulated Off-Leash Areas)

In stating that additional ROLAs (Regulated Off-Leash Areas) will not be considered", the GGNRA violates the court ordered procedures in US v. Barton. The GGNRA again seeks to ban historical recreational uses without public input. "Regulated Off-Leash Areas" should be considered like any other recreational pursuit, and decisions based on the merits of a given area based upon objective criteria - including historical uses.

My recommendations for the GGNRA dog policy are:

For those that do have voice control:

ROLAs option, my recommendation would be to have access limited and restricted to dawn-8 a.m. and 5 p.m. ? dusk (or 4 p.m. until dusk during PST).

Another ROLAs option would be to have a similar policy that was instituted in 1979's advisory commission for Marin County's Whitegate Ranch. That policy allowed for an Advanced Dog Training Area where use is restricted to owners and dogs that have successfully completed basic obedience training and are in process of advanced obedience or special skills training (i.e. search and rescue, etc).

On-leash During the other times I strongly recommend an on-leash dog policy. We share this open space with hikers, birders, children, bikers, seniors, and wildlife. Everyone can enjoy this amazing environment if dogs are on leash or if people have the voice control for the ROLA option.

A strong enforcement policy ? I have walked many times on Milagra Ridge and have found that dogs, people, bikers and seniors can appreciate the area and enjoy a relaxing day at the park. Part of the reason for that is the strong enforcement of the on-leash policy. People know that Rangers patrol the area (particularly on weekends) and therefore comply with the policy.

Trail Portal The current trailhead in Montara is not workable given it is in the middle of a residential area and next to a school. There has been strong opposition to the LeConte trailhead already and Second Street is semi-private, narrow, unimproved dirt road. If individuals parked cars at either of these locations it would cut off fire department access to the homes and the

Rancho.

I strongly advocate that you not penalize all dog owners for a percentage of bad dog owners. I would however strongly encourage an on leash policy with strong enforcement policy for those who cannot comply with the regulations or a contained ROLAs option. With that, we can all enjoy this amazing and spectacular area together.

Correspondence ID: 4027 **Project:** 11759 **Document:** 38106

Received: May,30,2011 18:12:58

Correspondence Type: Web Form

Correspondence: I have walked my dog daily at Crissy Field (from west end of lagoon to fort point) for 10 years. While there are cranky people and mad dogs, that is few and far between. Never have I seen a "pack of threatening dogs". On average, like a busy Memorial Day today, there were about 250 people, 8 dogs on the grassy area, and 10 on the beach,(west beach area) 2 dogs off leash and 10 dogs on leash on the gravel trail. Off season and foggy days (almost 360 days) there are generally 2 dogs in the grassy area, 4 on the beach, and maybe 3 off leash. The only time I have seen signs stating CLOSED FOR RESTORATION was the aftermath of a massive structure built for a fancy party on the flat grassy knoll near the warming hut. There are restoration signs there now, as it is the aftermath of a structure that took 1 week to build for a 1 night party, complete with wood dance floor. The grass is now mud and has been this way for about 2 months. The grassy area of Chrissy Field is so large that the few dogs that frequent it could never cause as much damage as this party rental area. The gophers are mote damaging to the lawn than a dog could ever be. If the herons eat too many of the protected gophers, will the herons be banned? If I were a snowy plower, a loose child, a rolling ball, or a dog on leash would be scary. This area should be prohibited to all. On busy times, the trash blows and toilets flow with the remains of humans who don't carry bags to clean up after themselves. Today I was at Chrissy Field and there is only one word to describe it...MOVEMENT! Whether you walk your child, your dog, your rabbit; bike,boat, hike, swim, fish, run, cook, or look, everyone was active and moving, even the hummingbirds, gophers, herons, sea gulls, pelicans, and seals, all enjoyed the day and all without mishap. Yes, a child, or a dog, or even I might suddenly stop or dart in front of a runner or biker causing a slowing of a heartbeat, but it is not with malice; it is just life. Some people get up in the morning with the intent to look for and express negativity, even on those beautiful days like today. I guess Crissy meets the needs of everyone. Let everyone be. Crissy Field has always been green and healthy. Why destroy what works? Dog owners clean up after their dogs and the park service cleans up after the people. Please don't fix what is not broken!

Correspondence ID: 4028 **Project:** 11759 **Document:** 38106

Received: May,30,2011 18:14:12

Correspondence Type: Web Form

Correspondence: This morning my sister, my husband, our dog and I walked at Fort Funston. It was stunningly beautiful and as we arrived at the parking lot our dog went wild with excitement at being at his favorite place on the planet. He loves it there more than any couch, the car, or any other spot. Why? Because he has the freedom to romp up and down free of any leash, free of anything other than our voice control. We have voice control, and we clean up after him, and we watch out for walkers and bicyclers and other folks who don't have dogs but love the park too.

Please don't take away this treasure from us and the thousands of other people and dogs who LOVE it.

We're environmentalists, bird lovers, plant lovers, park lovers, and are committed to keeping parks like this beautiful, open, and available to all people. We're open to restrictions, but the ones that have been drawn up leave us nothing of the park we've come to love. Please, give us all a chance to work together to come up with a plan that protects the land, protects the birds, protects the native plants, but also protects the joy we and our dogs have every day.

Please. Don't move forward with the plan you've released. It is wrong. We can do better.

Thank you, Craig Wiesner

Correspondence ID: 4029 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I walk every morning at Fort Funston, seven days each week, in the early morning. I am extremely disturbed by the unfairness of the proposed plan to limit dogs and off-leash dog walking.

In my many years of daily walks at Fort Funston, I have met countless interesting, productive and caring people. Enormous efforts are expended to keep Funston clean and safe. I personally know what Fort Funston was like before the dog walkers-it was dirty and abandoned and not the lovely place it is today. It is the "dog people" who have kept it clean and pleasant for

many years. As you no doubt know, we are a cohesive community of responsible dog owners, providing social interaction for many who would not regularly have a community (MANY SENIORS) or daily social interaction.

A very large number of seniors have dogs and walk them at Fort Funston (and no doubt other GGNRA areas). I personally see and walk with more than eight every morning between 6:45 and 8:30am. The eldest of my friends is 88 and walks daily with her shepherd. You will be removing an important social and fitness benefit from many lives if you so severely restrict off-leash dog access.

I would like to inquire about the fact that over the past eight months or so, the gate at Fort Funston is often locked shut for hours beyond dawn/sunrise. On a typical morning when this happens, you will see up to 20 or more cars parked along Skyline. It is very dangerous for people to have to pull in and out right on the side of the road, to say nothing of walking your dog from your car along Skyline to the path up to the Fort. Once again, I would like to bring up the issue of the morning seniors, who I assure you are very uneasy with this parking arrangement. I have backed many cars out for seniors who were concerned about getting their car out into the Skyline traffic. I truly believe it is inevitable that there will be an accident, and a person or dog will be hurt. If it is in fact true that the gate should open at sunrise, please honor that. We all see the many park vehicles inside the gate when it is locked. Fact or fiction, many of us believe the gate gets opened late whenever there is a march, or a meeting, or some new development in this dog crisis.

I am very concerned about the possible future lack of off-leash dog space. Where will we all go? What will happen to small neighborhood parks?

The remainder of my message is boilerplate, but I agree strongly with every word. The GGNRA is proposing to relegate us to a hilly pasture of foxtails at Fort Funston. This is unworkable and I urge you to work to compromise with us.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor

an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely,

Cathy McGee Pacifica, CA 94044

Correspondence ID: 4030 **Project:** 11759 **Document:** 38106

Received: May,30,2011 18:19:55

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I walk every morning at Fort Funston, seven days each week, in the early morning. I am extremely disturbed by the unfairness of the proposed plan to limit dogs and off-leash dog walking.

In my many years of daily walks at Fort Funston, I have met countless interesting, productive and caring people. Enormous efforts are expended to keep Funston clean and safe. I personally know what Fort Funston was like before the dog walkers-it was dirty and abandoned and not the lovely place it is today. It is the "dog people" who have kept it clean and pleasant for many years. As you no doubt know, we are a cohesive community of responsible dog owners, providing social interaction for many who would not regularly have a community (MANY SENIORS) or daily social interaction.

A very large number of seniors have dogs and walk them at Fort Funston

(and no doubt other GGNRA areas). I personally see and walk with more than eight every morning between 6:45 and 8:30am. The eldest of my friends is 88 and walks daily with her shepherd. You will be removing an important social and fitness benefit from many lives if you so severely restrict off-leash dog access.

I would like to inquire about the fact that over the past eight months or so, the gate at Fort Funston is often locked shut for hours beyond dawn/sunrise. On a typical morning when this happens, you will see up to 20 or more cars parked along Skyline. It is very dangerous for people to have to pull in and out right on the side of the road, to say nothing of walking your dog from your car along Skyline to the path up to the Fort. Once again, I would like to bring up the issue of the morning seniors, who I assure you are very uneasy with this parking arrangement. I have backed many cars out for seniors who were concerned about getting their car out into the Skyline traffic. I truly believe it is inevitable that there will be an accident, and a person or dog will be hurt. If it is in fact true that the gate should open at sunrise, please honor that. We all see the many park vehicles inside the gate when it is locked. Fact or fiction, many of us believe the gate gets opened late whenever there is a march, or a meeting, or some new development in this dog crisis.

I am very concerned about the possible future lack of off-leash dog space. Where will we all go? What will happen to small neighborhood parks?

The remainder of my message is boilerplate, but I agree strongly with every word. The GGNRA is proposing to relegate us to a hilly pasture of foxtails at Fort Funston. This is unworkable and I urge you to work to compromise with us.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set

up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely,

Gloria Martinez

Correspondence ID: 4031 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:20:15
Correspondence Type: Web Form
Correspondence: Please don't restrict our pets to leashes! Encourage responsible dog handler behavior. Our city dogs need exercise and room to run freely!

Correspondence ID: 4032 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: Before my dog passed away in July, 2010, we spent many hours hiking in the GGNRA in Pacifica. This was a great place for both of us to exercise and keep ourselves healthy. I think it would be a grave disservice to ban dogs from the GGNRA in Pacifica. Please keep this area multi-use, including dogs and their owners.

Sincerely, Judy Kay, RN, BSN, HNB-BC Pacifica, CA 94044

ID:

Received: May,30,2011 18:27:46

Correspondence Type: Web Form

Type:

Correspondence: I am mother and love having the dogs at Crissy Field. My children enjoy playing and interacting with them. It is the reason that we go to Crissy Field rather than other parks. Seeing the dogs swimming, running and playing is a joy and only enhances our experience. Having dogs on leash only would greatly restrict this and would be a big disappointment. The dog owners we have met are very responsible and I never fear for the safety of my children. As a mother, I have a choice of going to a place where dogs are off-leash or on-leash. Parents who are uncomfortable with off-leash dogs have many options.

Correspondence ID: 4034 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

My partner and I have two small dogs. Walking them in off-leash areas of GGNRA is a highlight of our recent decision to move to San Francisco (May 2008). In fact, opportunities to walk with our dogs in appropriate areas of the GGNRA was a key factor in our deciding to purchase a Condo and make San Francisco our home. The pet-friendliness of the City, which would be marred by the largely unsubstantiated proposals in this Dog Management Plan, was a selling point for us, as it is likely for many other Bay Area urban home-buyers. Why take away this important social and recreational incentive that results in bringing people to the City and strengthening the economy? Further, we and other dog owners we know and see every day are among the most attentive recreational users of the GGNRA. Dog owners seem always on the look out for ways to be respectful to this important access to the natural environment, while I have witnessed many non-dog owners abusing the recreational privileges of the parks by littering or sitting, spreading a blanket or holding a picnic in areas that are meant to be protected and off-bounds to people and domestic animals. Enforce desired protections by citing both non-dog-owners and dog-owners alike who may be in violation. Though I'd venture to say very few are dog owners.

It is critical to maintain these off-leash areas. Without such areas we run the risk of creating great and unnecessary frustrations to dogs and dog-owners alike, which could mar our good record of having relatively low-incidences of dog misbehavior among urban areas nationally.

Correspondence ID: 4035 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:28:17
Correspondence Type: Web Form

Correspondence: FLAWED DEIS NEED FOR
ACTION/JUSTIFICATION/DISMISSALS/EVIDENCE ? PUBLIC
COMMENT AND SUGGESTIONS

SUGGESTIONS:

1) This DEIS is unjustified and the Park Service NEPA analysis is fundamentally flawed; the entire DEIS should be rejected in totality. The Park Service should start over and create a dog management plan that more appropriately represents the Recreation Mandate of this National Recreation Area (NRA), the cultural values of the Bay Area, and sound land use principles instead the speculative, exaggerated, and misleading analysis and justifications.

2) All "Alternatives Suggested and Dismissed from Consideration" need to be re-evaluated considering the recreational value of the park, valid scientific monitoring and measurement of incremental impacts from dog recreation, and the recognition that some impacts are justified to support the recreational mandate and to maintain recreational opportunities for this and future generations.

3) Acknowledge that Fort Funston is zoned for high visitation and not a "natural" area. Just like other sports areas and cultural lands (e.g., golf courses, athletic centers, museums, parade grounds, building, etc.), Fort Funston was never intended to be primarily a native plant and wildlife habitat but a place for a high volume of urban people to enjoy active recreation. Acknowledge that these crowded parks are vastly different from uncrowded "natural" areas (e.g. Oakwood Valley, Sweeney Ridge, etc.) and require different management and impact monitoring strategies. Also, acknowledge that Fort Funston provides tremendous value to the urban community by providing for the needs of a large segment of the population that enjoy dog recreation and that other mixed-use options that marginalize dog recreation are unlikely to increase the recreational value of the area.

4) Comply with the GGNRA enabling legislations requiring sound principles of land use planning and management such as those used by the Park Service at Rattle Snake National Recreation and Wilderness. If the Park Service is unable to achieve the recreation mandate, transfer the management of the GGNRA to a more suitable organization that values recreation.

5) Provide comprehensive measurements of actual park visitation and dog usage instead of just statements about crowding levels and estimates of dog usage. This is critical for measuring the current recreational value and for monitoring the Park Service maintenance of that value for current and future

generations.

6) Use this public comment process to prove that the Park Service meaningfully involves the public in the decision-making process and to mend the Park Service relationship with the recreational user of our NRA and to create a more cooperative relationship.

JUSTIFICATION:

The "SUMMARY-CONSISTENCY WITH SECTIONS 101(B) AND 102(1) OF NEPA" illustrates why this DEIS is fundamentally flawed and should be rejected in totality. The Park Service was required by NEPA to analysis how each alternative meets or achieves the purposes of NEPA, as stated in sections 101(b) and 102(1). Below is their analysis of the existing "No Action" Alternative A which highlights the fundamental flaws with this entire DEIS need for action/justification and the resulting plan, as well as the fundamental disregard that the Park Service has for the Bay Area residents and the urban recreation mandate of our NRA.

Most startling is the Park Service dismissive attitude toward local residents as highlighted in the DEIS on Page 267: "In many parts of the Bay Area, GGNRA lands are the backyards of the citizens, and residents have COME to expect public lands to be made available for dog walking and other recreational activities". The Park Service seems to have no understanding or appreciation for the on-going cultural and health significance of these urban recreation areas and seems determined to re-write history and impede this generation and future generations from enjoying the legislatively mandated recreational value of our NRA and instead is purely promoting and exaggerating the "conservation" value of the park.

Below is the Park Service NEPA analysis of the "no action" alternative along with my PUBLIC COMMENTS:

1. Fulfills the responsibilities of each generation as trustee of the environment for succeeding generations.

a. Alternative A would not fully meet the purpose of fulfilling the responsibilities of each generation as trustee for the environment. The no action alternative is based on a combination of Park Service regulations, the 2005 federal court decision (U.S. v. Barley, 405 F.Supp.2d 1121 (N.D. Cal. 2005)), and public use practices. Because dog walking regulations are routinely ignored by visitors at many park sites, on-the-ground activities sometimes vary widely from posted regulations. These differences are attributable in part to changes in dog walking policies over the years, court decisions regarding dog walking in GGNRA, and public confusion due to

both those changing circumstances and variable levels of enforcement.

Off-leash dog walking currently occurs at many of the sites. Dogs enter areas where sensitive species or habitats may occur. Dogs also frequently go off the trails or roads and create impacts to soils and vegetation through compaction, trampling, and nutrient addition. Under the no action alternative, dog walking activities would remain the same and adverse impacts to vegetation, wildlife, special status species, soils, and water quality would continue unregulated and unmitigated.

PUBLIC COMMENTS

The choice for America is recreation or conservation or a balance of both for future generations. We must protect our recreation heritage and culture, including off-leash dog recreational heritage and culture, for future generations to enjoy. The Park Service has not met any burden of proof that the off-leash GGNRA dogs have any real impact on the existing natural environment or other recreational users, and the history of off-leash dogs started in the park long before it even became a NRA. The natural environment in the park is quite healthy, and the Park Service has not provided any significant evidence that it is less healthy than 40 years ago due to any recreation in the park. Future generations must be able to continue the Bay Area outdoor enthusiast traditions. Hopefully, the Park Service will continue to introduce habitats for protected species within the park without significantly banning people's ability to exercise with their off-leash dogs in the park or take their children to the park with their family dog or impede other traditional recreation in the park.

Sure dogs are natural scavengers and predators, as are people. Our companion dogs are typically well-fed and don't go to the NRA to destroy the natural environment that we all love or to harass people or wildlife. The Park Service has taken an extremely conservative position that minor disturbance, even just altering to the presence of a dog, is unacceptable and is disturbing wildlife. All people would be ejected from our NRA, if the Park Service measured the adverse impact of people on the environment in the same way they are targeting people with dogs. Both dogs and people impact wildlife but some level of impact has to be accepted if we - and future generations - are to continue healthy interact with our environment.

The Park Service has minimized the importance of "recreation" to future generations and to the national parks system. "Recreation" is a mandate of the GGNRA, as reflected in the name. The Park Service has attempted to change that mandate by removing "recreation" from the park's name and changing it to Golden Gate National Park (GGNP). While the name change has failed in Congress, supporting organization such as the Golden Gate National Conservancy and Wildlife Equity refer to the park as the GGNP,

formerly known as the GGNRA. In addition, the Park Service contends that the GGNRA was created to create a National Park caliber experience which was not the intent of the GGNRA, which was clearly a NRA not a National Park.

The main catalyst for removing dogs from the park seems to be that National Parks do not allow off-leash dogs, except for some that allow hunting. The National Park service wants to manage all their parks the same and consider people with dogs challenging them in court and winning to be a nuisance. The Organic Act calls for the National Parks to regulate and conserve the "natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." If any of the action alternatives are adopted, future generations will not only be impaired but prevented from enjoying our recreational areas. Instead of being recreational areas, they will be gardens and enclosures to observe from afar instead interactive and personal experiences that we enjoy today.

Adverse Impacts Support by Minute Scientific Evidence and Voluminous Speculation: The Park Service is using unfair practices and is convoluting the real issues with 2200-pages of highly speculative and unsubstantiated adverse impacts caused by dog recreation. The Park Service has not provided any burden of proof in the 2200-page DEIS that dogs are significantly impacting the natural environment within our NRA and has not fulfilled its responsibilities to provide for sound land management practices, which should include monitoring the natural resources and recreational value. Almost all the evidence is speculation about what the dogs "may" do with no supporting monitoring in our NRA.

The Park Service sited research from other organizations that is non-conclusive about how dog impact wildlife populations, and Park Service makes no attempted to quantify how GGNRA dogs are increasing or decreasing the wildlife populations nor what that impact is over time. The Park Service is also ignoring that wildlife are known to habituation to human activities, including the presence of a dogs, and that over habituation to human activity is also not healthy for wildlife in an urban environment nor is it generally wise to encourage significant up-close human interactions with predators and other wildlife.

There is no evidence presented about the level of impact or the cumulative impact on nature that will impact future generations. By these standards, the potential to step on one tadpole seems sufficient evidence to exclude dogs. Based on this standard of evidence, all human recreation should be banned from the GGNRA because humans "may" impact the natural environment. Examples of dog impacts are digging in the sand, walking through closed areas, disturbing wildlife just with their presence or unintentional flushing,

preventing birds from foraging by walking by, littering (e.g., peeing & pooping), etc. With all of these activities, the GGNRA humans have a much greater footprint on the natural environment than the dogs and the addition of a dog only has a minor and acceptable additional impact considering the role of dogs in encouraging daily recreation and the urban recreational demand for this activity.

The DEIS alternatives are not about introducing dogs to the GGNRA; the dogs have been off-leash on these lands even before it became the GGNRA. The DEIS says the adverse impacts are measurable; however, the Park Service has few measurements of the impacts, and in the rare cases the Park Service has done measurements (e.g., water quality and the Western Snowy Plover), the results don't support their speculation. Their main measurable evidence of degrading the environment are the high rate of leash law violations. The leash law violations are actually just evidence that dogs are off-leash in these areas so if the Park Service speculations are true the impacts should be even more measurable.

Even though the Park Service has not quantified the adverse impacts, recreational areas such as Fort Funston, just like any of the Presidio athletic fields or cultural centers, obviously don't have sensitive native vegetation, and wildlife is not as plentiful because of the high visitation by people. These type locations cannot be used to justify removing trail hiking because the high city park level visitation and the type of recreation is not the same as that on hiking trails in large open spaces.

This areas are just like children's playgrounds or baseball fields that don't have extensive native plants or much wildlife either. Fort Funston is covered with non-native ice plants that the military used to successfully stabilize the dunes and is the dog world's athletic field that requires and receives almost no maintenance costs. Considering that some 450,000 people visit the GGNRA with their dogs, some special dog-focused locations, like Fort Funston, provides a valuable location where dog training can be perfected with little impact on visitors that dislike dogs and also provides exceptional health, safety, dog behavior insights, and cultural benefits to the Bay Area community. Indeed, Fort Funston is one of the great cultural phenomena's of the GGNRA and represents a unique opportunity for gaining a greater understanding of healthy canine/human social interactions.

Note that Fort Funston has always been zoned for high visitation; and it is offensive that the Park Service posts signs about "an Abused Landscape" on park entrance signage. Fort Funston is not abused because it hasn't been restored to a native plant or wildlife habitat any more than Fort Mason is abused because it doesn't have native plan habitats instead of administrative building, piers, lawns, etc. or the Presidio is abused because it has sports fields, parade grounds, building, shopping centers, golf courses, etc. that

have not been restored to native plant or wildlife habitats. Once again, this just demonstrates the Park Services disdain for recreation, particularly dog recreation.

Fort Mason, the Presidio, and Fort Funston all represent land that is being used as intended for the benefit of an urban population. In the 1980 GGNRA General Management Plan, it was recognized that Fort Funston would appear to some as a "natural" area but would require the same maintenance as other high visitation areas such as Fort Mason. The current Park Service seems to be confused or even worse deceptive about the purpose and needs of the Fort Funston recreation area. Perhaps, Fort Funston does need more monitoring and maintenance to ensure that it continues to provide the same recreational value to the present and future generations but the Park Service has not done either, or at least not provided that information in the DEIS or through apparent activities on the ground. The Park Service should be measuring the impacts of activity on the environment and working the dog community to address those that will likely impact future generation or that can be resolve with reasonable modifications to park management and visitor usage.

Based on this DEIS and the draft GGNRA General Management Plan newsletters, the Park Service seems to be planning to change the recreation usage of Fort Funston. Currently, according to the upper parking lot traffic counts, there are at least 2000 people on average a day and probably more that use Fort Funston for healthy and safe recreation, including long walks and active socialization with others. On a pretty weekend or evening, the parking lot overflows and the park is full of happy families and people with their dogs enjoying the park together. This high visitation is achieved with almost no services or facilities from the Park Service other than maintenance such as routine garbage collection, portable toilet maintenance, and trail maintenance. The main facilities include a side walk/road from end-to-end, some self-maintaining trails, a sand latter, garbage cans, a few benches and water stations, a portable toilet in the parking lot, and a parking lot. The high visitation is achieved even without real services such as food services, park ranger programs, or visitor centers, unlike Stinson Beach and Crissy Field that show lower visitation per the Park Service counting methodology. Ocean Beach is the location that has more visitation than Fort Funston.

The Park Service seems to imply that Fort Funston is evidence of the adverse impact of dogs on wildlife, soil, and vegetation and is ignoring that expected high visitation and crowding is the main cause of any issues in this area that is zoned for high visitation.

Crowded, high visitation areas will have less wildlife than uncrowded areas, with or without dogs. The adverse impacts for the natural environment throughout the NRA are questionable and don't address the issue of the

incremental impact of dogs on the environment in the park. In addition, the Park Service has not defined any quantifiable standards for what represents a minor, moderate, or major impact. Having hiking trails equates to a moderate impact for some areas, even if that trail is only 0.5% of the area, and with no indication of impacts that accumulate over time. All the adverse impacts levels are highly questionable and seem inflated. The Park Service should not be allowed to use purely subjective standards without sound measurements to support these drastic changes nor to imply that impacts are the same for sites with different zoning.

Non-Critical Beach Habitat for Western Snowy Plover Replaces SF Beach Recreation: The DEIS Preferred Alternative excludes dogs from two-thirds of Ocean Beach because the Western Snowy Plover uses the grassy dune areas for resting and feeding during the overwintering season. The first question is: "Should a non-critical habitat for a protected species significantly impede human recreation in high visitation areas of the GGNRA?" That is the main question that Americans must answer because, if so, unbiased research would likely show that visitors without dogs have a far greater impact on the Western Snowy Plover than visitors with dogs and all people should be excluded from these SF public beaches by that standard. It is highly suspect that is actually what the Park Service's plans since the Park Service refused to provide the current draft of the GGNRA General Management Plan even though it was requested in a Freedom of Information Act request.

The Park Service has done little to prevent people from going through the dune areas because it isn't a breeding area so it isn't that critical for the species recovery. The DEIS actually rejects the proposed fencing solution in the Negotiated Rule Making. Fencing, such as exists in many areas of the park, that would not only reduce the theoretical impact of dogs but also reduce the larger population of disturbances by people using the dunes for watching the ocean or sunsets or for accessing the beach from the local neighborhoods.

Even if conservation receives a much higher priority than recreation, the Park Service research is highly biased and provides little evidence that the dogs are significantly impacting the Western Snowy Plover. Based on their population data, the Western Snowy Plover population actually improves when there with more dogs off-leash on Ocean Beach, and they have not developed a direct correlation. The Park Service is only speculating that off-leash dogs impact the Snowy Plover population at Ocean Beach and their feeding success with little scientific evidence. From a practical standpoint, the plover activity is in the dunes, and dog activity is primarily at the tide line. The dogs are only in the plover areas briefly if the owner, like others from the Sunset neighborhood, chooses to use the dunes for accessing the beach. Otherwise, owners would have to deliberately take their dogs to the

dunes to disturb the plovers. Few people even know the plovers are there; particularly since the Park Service has done little to warn the public about the significance of the dune areas. I've noticed highly effective large distinctive signs at Mori Point warning about the coyote risks but nothing comparable for the Western Snowy Plover, the Bank Swallows, or the dangerous cliff areas in the NRA.

The Park Service in collaboration with organizations such as the Audubon Society to research the impact of dogs on the Western Snowy Plover. This research is highly biased and doesn't provide evidence that the WSP population is significantly impacted by the dogs or by people. Their philosophy seems to be reflected by this quote from Daphne: "Ocean Beach without people is an incredible habitat?"

In fact, the WSP population increased with the dog activity. Unbiased research from Warren, shows no correlation between recreational (including dog) activities and snowy plover feeding habits.

In addition, the habitat is not deemed critical and is only a resting place for the Plover. The standard is that any impact should result in dogs being excluded. Once again, by those standards, all people should be excluded as well since people have a greater impact on the Western Snowy Plover than dogs.

Replacing the San Francisco Bay Area Recreational Heritage with New Coastal Conservation Habitats: The Park Service is ignoring the value of dog recreation for future generations. The Park Service is attempting to convert the traditional San Francisco recreational areas for people into new habitats for coastal birds and plant life. For decades, Fort Funston has been the Mecca for off-leash dog recreation and represents the ultimate experience for people that enjoy taking their families out with their dogs or using their dog as a catalyst for daily exercise and fun. On a beautiful warm day, hundreds to a thousand people cover the park with their canine companions. On a typical day at least a hundred dogs are in the park at any one time. Baker Beach is a local beach where families go for beautiful vistas and safe off-leash recreation.

While two major adverse impacts relates to Ocean Beach with the Western Snowy Plover, all the remaining five DEIS major adverse impacts are related to Fort Funston, the Mecca of Bay Area dog activity. The Park Service wants to plant new population of endangered plants at Fort Funston and increase wildlife in the open spaces that are currently used for families, seniors, and other for getting out with their dogs for play, fetch, dune scabbling, ocean swimming, and hiking. Fort Funston has successfully established closed areas for creating other large coastal habitats but exaggerates the dogs' impacts, generally only along the trails edge, on the

success of those closed areas. Eliminating the large number of visitors will allow the Park Service to easily create these new native vegetation habitats without having to share the park these dog visitors that visit frequently. Even if the Park Service creates educational facility, as proposed in the drafted GGNRA General Management Plan, visitation to this area will drop dramatically, probably more than the 50% visitation drop at Ocean Beach over the past decade.

From a cultural standpoint, Fort Funston represents a living monument to dog people and our relationship with our dogs and how dogs relate to each other. For decades, the San Francisco culture has embraced off-leash dog recreation, and Fort Funston is the Mecca for this movement. Fort Funston is a place that few non-dog people have ever gone because it is more remote and obscure than the typical GGNRA beach areas. Because of the heavy visitation by people with dogs, there is little impact on non-dog people as owners hone their dog's social manners and a dog's recall and new dog people can safely learn about appropriate dog behavior while at Fort Funston. However, the DEIS considers the high percent of visitors with dogs to be a negative since the percentage of visitors without dogs is low. If dogs are leashed and the poison pill implemented, Fort Funston will likely turn into an uncrowded area since visitors with dogs won't have the incentive to drive all the way to Fort Funston from other areas. Few people know Fort Funston exists until they get their first dog. As an outdoors type person, I think I only visited the Fort Funston for the vista once, if that, before our dog joined the family.

The DEIS action alternatives will reduce the day-to-day use of the GGNRA by some 450,000 people that visit the park with their dogs. These dog people have traditionally ensured that recreation continues to be a mandate for the GGNRA. If any of the DEIS action alternatives are accepted, future generations will not be nearly as inspired to use the GGNRA on a daily basis for exercising, relieving stress, and socializing their dogs.

2. Ensure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings.

a. Alternative A would not fully meet the purpose of ensuring for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings. Dog walking regulations would continue to be unclear to visitors and would continue to create visitor and dog conflicts. Off-leash dog walking would continue in areas with high visitor use and high multiple-uses, which would increase the risk of dog related injuries to occur. Unkempt dog waste would also continue to be a problem, which would increase health and safety concerns and decrease the aesthetic and cultural landscape of the park.

PUBLIC COMMENTS

Fun and Diversity: Walking a dog off-leash in the Bay Area is fun and provides diversity and one of the layers of texture to our laid-back outdoor culture. Visitors with dogs share the park with a rich tapestry of people from naturalists, bird watchers, walkers, joggers, bicyclists, surfers, beach combers, sun worshipers, children, tourists, handicapped people, kite flyers, picnickers, disc or ball throwers, horseback riders, hand gliders, etc. Dog people celebrate this diversity that adds joy to our time outside. Some conflicts occur but they are few and far between. Most people respect others' space, are ok with some minor interactions, and just enjoy the park together. Most of us love seeing the rich tapestry in motion.

People love being out with their off-leash dogs because of our empathetic feelings for our dog and that their joy transfers to us:

? Watching our dogs explore the environment with their noses ? Watching dogs meet and greet each other ? Dog-dog play sessions ? Playing with our dogs with balls, discs, sticks, recall games, etc. ? Watching our dogs frolic in the surf or along the trail ? Watching other people and children enjoying interacting with our dogs ? Watching our dogs' social skills develop with both people and other dogs

Sure some people dislike or fear dogs. People with fear issues aren't likely to be comfortable with being on the trails with mountain lions in the hiking areas so this issue mainly impacts city and beach areas. In the perfect world, people would not have phobias or intolerances of others; however, isolating people from dogs will not help deal with the irrational fear or dislike that some people have of dogs. Children are unlikely to grow up with any irrational phobia or dislike of dogs if they have encountered family dogs regularly in the GGNRA.

From personal experience on public beaches, the few people that exhibit true fear of dogs appear to be recent immigrants to the Bay Area that have never been exposed to the friendly, family dog. In some countries, most dogs should be feared because they are feral, not socialized to people, and are not vaccinated. The GGNRA family dog is quite different from these feral animals. The GGNRA should do a better job of providing awareness about the low risk to people instead of flaming people's irrational fear.

Health Benefits: Because visitors with dogs love being out with their dogs, exercise is fun and dog people use the park for exercise more than most outdoor enthusiasts. The DEIS ignores the tremendous health benefits of some 450,000 dog people exercising in the GGNRA on a regular basis. On average, these dog people go to the GGNRA eighty days in a year, some twice a day. Instead of discouraging people, the GGNRA should be

encouraging more people to get out and move. San Francisco is currently one of the fittest city in the world.

<http://www.shape.com/lifestyle/travel/fittest-cities-8-san-francisco> The GGNRA provides a free platform that everyone should use for getting in shape and preventing morbid obesity, diabetes, heart problems, stress, several cancers, etc.

Dogs are a catalyst for getting normal people moving and off-leash recreation is the ultimate walking exercise program. With a high-energy dog and a responsible owner, dogs are exercise coaches and get their companions out at least twice a day, rain or shine. In addition to burning calories, off-leash dog hiking relieves stress and is a form of meditation. Both the dog and the human move at their own brisk pace and in harmony with no tugging or stopping. With other friendly dogs, the dogs calmly greet each other and sometimes play but usually just move along quickly. On the trails, leashed dogs are not a problem because there is plenty of space for recalling and preventing any physical interaction.

Moving the Feces: Some dog owners fail to pick up their dog's feces but in the GGNRA other dog owners generally pick up the orphan poop. Dog pee is a more negligible health and aesthetic issue since pee is sterile and one only smells pee after a first rain in the high visitation entrance areas such as at Fort Funston. Leash laws have little impact on the small percentage of dog owners that don't pick up poop. City and neighborhood streets and parks that require leashes have a worse a problem with orphan poop. Discouraging these irresponsible people from going to the GGNRA will only transfer and concentrate the existing problem from the GGNRA into the city and neighborhoods, where it isn't managed as well. Moving the feces out of the GGNRA sight or concentrating it in a smaller area is not improving public health. As the DEIS state, the Park Service routinely empties GGNRA trash cans that are filled with poop bags. Little poop actually stays in the park, and while the GGNRA theorizes how dog poop could impact ocean water quality, their water quality measurements do not support those theories. In addition, theoretically, dog poop from city and neighborhood streets will move faster into the ocean or Bay than orphan poop filtered through the GGNRA soil.

Nothing raises the ire of other dog owners more than those that don't pick up. With some 450,000 people taking their dogs to the GGNRA on a regular basis, even 1% of dog people being irresponsible means poop on the trail shoulders. Dog groups have regular clean-up days in heavy dog use areas such as Fort Funston and other owners just routinely pickup on the trails. Dog owners dislike orphan feces even more than other visitors because our dogs are more likely to step in, sniff, or eat the feces ? disgusting.

The Park Service has done little to address the orphan poop issue. Other,

more dog-friendly parks, provide bags and signage to help encourage poop pickup. GGNRA places such as Sweeney Ridge don't have signage, and people routinely leave poop along the trail for other irritated owners to pick up. The Park Service could be more proactive in implementing permanent signage, dog owner awareness campaigns, and using large temporary signage for the few problem locations.

3. Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences.

a. Under the no action alternative, off-leash dog walking would still occur in areas with high multiple visitor use, creating visitor conflicts and dog-related injuries. Dog walking regulations would remain unclear, which would also contribute to visitor conflicts and dog related injuries. In addition, off-leash dogs would enter areas where sensitive species or habitat exists, trample vegetation, compact soils, or chase wildlife, all of which would degrade the natural environment.

PUBLIC COMMENTS

Little Confusion: Visitors with dogs off-leash where leashes are required are seldom confused other than perhaps the confusing Marin trails or a few tourists that just observe others off-leash and assume it is legal. Families with small children, seniors, and other individuals that are normally law abiding citizens find themselves as law breakers when they get a family dog. Responsible people will break the current suppressive leash laws if they are committed to their dog and their own mental and physical health. The high number of regular people violating leash laws is an indication that public need is not being met. Providing a better balance of off-leash versus on-leash access, particularly in San Mateo County, would reduce people's stress and encourage responsibly exercising themselves and their dog.

Almost all parks and trails in San Mateo County require leashes, if they allow dogs. Providing off-leash dog recreation area in the GGNRA, would provide places that people could go without worrying about being ticketed. People that want to walk their dogs without any possible encounter with off-leash dogs or those that just dislike dogs could use those other extensive park and beach areas without dogs.

Safer Family Dogs: GGNRA off-leash dogs are likely the safest family dogs in the world. Most are or could easily be therapy dogs in nursing homes, schools, and other community service organizations. GGNRA off-leash dogs, particularly in San Francisco, are socialized on almost a daily basis with a wide variety of people, seniors, toddlers, dogs, horses, etc. All these positive encounters are critical for building the safest dogs possibly in the

world.

Even families without small children reap the benefit of their dogs safely interacting with children so that their dogs know that children are not some unknown alien. Wise dog owners only interact from a safe distance and teach their dogs that small children are wonderful and mean great treats are coming. Babies, toddlers, and other children are regularly out with their family dogs at high-use, off-leash dog areas such as Fort Funston. The main danger to children in the park is highly socialized GGNRA dog accidentally bumping a child when playing or being too friendly and jumping on a child. Unsocialized dogs in homes that don't get regular exercise and training are a far greater risk to people and children's health and well-being. In the home, children are the most likely to have serious dog bite because their faces are lower, their skin more fragile, they're more likely to irritate the dog, and the dog can't easily move away. Responsible socialization, exercise, and positive interactions help reduce this risk.

Most dangerous and vicious dog bite incidents occur at the dog's residence and are related to resident dogs not family dogs. Resident dogs (e.g., fighting dogs, guard dogs, police dogs, backyard dogs, etc.) are not an integrated part of the family like GGNRA dogs. Other public dog risks are stray dogs that are abandoned or escape their homes and aren't social. Either loose in the neighborhood or interacting with visitors in the home, most GGNRA family dogs have a long history of positive interactions with all types of people and are less likely to cause harm due to fear. Exercising together creates a strong bond between humans and their canine companions and helps ensure that these dogs are treated positively and have positive association with people.

The GGNRA law enforcement information supports the low incidence of dog bites and attacks in the GGNRA. The Park Service only reports about 27 dog "bite/attack" a year. Fort Funston has the most incidents but provides tremendous value to the dog community and represents the highest concentration of off-leash dogs and crowded conditions plus the additional issue of equestrians that sometimes ride at Fort Funston. Even there, the number of incidents is quite low and insignificant in comparison to the high number of people with dogs. The visitor traffic counter for the main parking lot has on average 1083 and the Park Service uses a multiplier of 2 for an estimated average daily visitation of 2166, which is more than the Park Service estimates for the high resource intensive Crissy Field. Unfortunately, the Park Service visitor trend and counting appears severely flawed and is likely significant understating visitation at both sites.

I expect that dog recreation is far safer than most other active recreation including jogging (e.g., falls, sprained joints, etc.) and bicycling (e.g.,

crashes, car accidents, etc.).

Cliff Rescues

The cliffs represent a safety risk for dogs and their people. The cliffs are near the main trail at the main Fort Funston parking lot and along much of the coastal park areas. Only one small sign, about 150 feet down the trail, warned people about the cliff danger, until the Park Service added a new bigger sign recently. A few people do go out to the cliff to do things like take scenic pictures without being fully aware of the risk. Other dog owners are the one making others aware of the risk; however, people can use the park for a long time before realizing the significance of the cliff risk. The park service has refused to consider planting prickly vegetation to dissuade people and dogs from going to the cliff edge or even fencing or better signage. There is a need for more action by the Park Service but preventative measures, other than reducing and banning dogs, would be a more reasonable solution.

Note that the Ranger/USPP descriptions in the PDFs of the cliff rescues in 2007 and 2008 provide no indication of high risk rescues putting park personnel in unreasonably risky situations, particularly at Fort Funston. Driving a car to work is far more life-threatening than these cliff rescues appear; particularly considering that safety equipment and experience is available to minimize the likelihood and severity of any fall.

4. Preserve important historic, cultural, and natural aspects of our national heritage and to maintain, wherever possible, an environment that supports diversity and variety of individual choice.

a. Alternative A would not fully meet the purpose of preserving important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice. Currently ground disturbance by dog walking, specifically under voice control is damaging to cultural resources at sites such as Fort Funston and Baker Beach within the Presidio NHL. Under the no action alternative, dog walking under voice control could continue in areas that would damage the cultural resources.

PUBLIC COMMENTS

Recreation Heritage and Culture: The Park Service seems to attribute physical structures to Cultural Resources and is ignoring the important cultural components. The military structures and Native American heritage is important to preserve but so is the the development and maintenance of the local culture. Nothing is more fundamental to the Bay Area or the GGNRA than the community gatherings and bonding experiences that

happen on beautiful days at high visitation places such as Ocean Beach, Crissy Field, Muir Beach, Rodeo Beach, Fort Funston, Mori Point/Sharp Park, etc. It is quite an incredible experience to participate in this tremendous melding of people from all ethnic, generational, socio-economic, recreational backgrounds as they communally relax and enjoy the park in their own way. Just as watching our dogs and wildlife play provides tremendous pleasure, so does joining this mass of humanity enjoying the simple pleasure of enjoying the outdoors together. On those beautiful days, it is one experience after another of happy people enjoying the park and each other. This diversity and freedom is core to the Bay Area culture and what separates it culturally from most other communities.

Dog Recreation Heritage: Walking our dogs is part of our living national heritage, particularly in the Bay Area. Dogs have been off-leash in these areas long before the establishment of the GGNRA and have over a 30 year history with the GGNRA. This heritage is even more important cultural landmark particularly the remaining concrete foundations and military batteries in these parks. Generations of people have grown up taking their off-leash dogs to GGNRA lands, and it is only fair to allow future generations the same joy.

Remaining Military Concrete Structures: As stated in the DEIS impact statements in Table 5, there is no effect from dog recreation on the cultural resources in the GGNRA per NHPA. The ground disturbances are not due to the dogs; the ground disturbances are due to natural erosion and somewhat people visitation and trampling. It is disingenuous for the Park Service to present "Cultural Resources" as a justification for this plan throughout the executive summary and justification narratives when it is clear in the detailed impact statements that dogs are not having any measurable impact.

5. Achieve a balance between population and resource use that would permit high standards of living and a wide sharing of life's amenities.

a. Under the no action alternative, dog walking regulations would continue to be unclear to visitors. Dog walking would continue to occur in restricted areas and would continue to adversely impact the park's natural and physical resources. Although, visitors would have the opportunity for dog walking at the park, resources would continue to deplete. Without higher protection of resources and clear dog management regulations, these amenities would not be available for the enjoyment of future generations.

PUBLIC COMMENTS

Recreation is a mandate of the Golden Gate National "Recreation" Area since its inception. Dogs have been off-leash on GGNRA land for over 40 years and certainly well before the creation of the park. Having a family dog

and fully enjoying life with our dog is part of the high standard of living that Bay Area people enjoy. Dogs inspire us to get out and move and reduce our daily stress. Seeing a dog's pure enjoyment in life transfers to us and makes us happier people which reduced mental and physical ailments. Many people live in the Bay Area because of the high quality of parks and our ability to enjoy the outdoors with our canine companions.

The dogs have been in the parks for over 40 years but the Park Service has not measured the adverse impacts on the park. The evidence provided is speculative and biased, and the Park Service has not done reasonable due diligence to test or measure for real impacts. The only scientific measurements relate to the Western Snowy Plover and that research is highly biased and doesn't provide evidence that the WSP populations are directly impacted by the dogs or how much of an impact occurs. In fact, the WSP population seems to be higher with less recreational suppression. In addition, the habitat is not deemed a critical habitat for the recovery of the plover and is only a resting place for the Plover. The Park Service standard seems to be that any possibility of an impact is justification to exclude people with dogs. By those standards, all people should be excluded as well since people have a greater impact on the Western Snowy Plover than dogs. Actually, that seems to be the fairly hidden agenda that is part of re-designation of Ocean Beach to "Natural".

Most local people are not unclear about the regulations. People believe the regulations are arbitrary and suppressive because they know that their dogs are well trained and not a threat to the park or to other visitors. Off-leash walking is good for both the human and the canine soul and the waistline.

If any of the action alternatives becomes policy, future generations will not enjoy the rich and diverse recreational opportunities that are the Bay Areas' heritage.

6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

a. Alternative A would not meet the purpose of enhancing the quality of renewable resources. Under the no action alternative, dog walking would continue to contribute to the adverse impacts to the park's resources. The second purpose, "approach the maximum attainable recycling of depletable resources," is less relevant to the dog management plan, as it is geared toward a discussion of "green" building or management practices. There would be no construction related to the no action alternative (alternative A), so this purpose would not apply. The action alternatives would involve the installation of new signage throughout the park stating the dog walking regulations for each site. Environmentally appropriate design standards and

materials would likely be used to minimize impacts to depletable resources.

PUBLIC COMMENTS

Renewable resources is not significantly impacted. However, because off-leash dog hiking is not available in San Mateo County, residents have to drive all the way to San Francisco County to enjoy hiking with their dogs. This only deters healthy recreation but increases traffic and the associated negative impacts on safety and pollution. The DEIS presents two off-leash areas in San Mateo County. Pulgas Ridge area is about a third of a mile long play area and in the middle of a longer on-leash hike. Esplanade Beach in Pacifica is a dangerous beach to reach and a dangerous beach for people and dogs. The beach has significant riptides that could catch a dog and result in owner death while trying to save the dog. In addition, rogue waves could pound a person against the cliffs.

Correspondence ID: 4036 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:32:17
Correspondence Type: Web Form
Correspondence: I cannot speak to all the areas encompassed by this proposal, only Crissy Field and Fort Funston. They both have separate areas already. Crissy Field has a long paved walkway for people to go on where dogs are on leash. I very rarely see people without dogs on the beach unless they're going out on the water to windsurf. It is usually very windy and cold there by the waterfront.

At Funston, the area is somewhat dangerous because of the cliffs; the beach is very hard and steep to get to and virtually deserted. The parasailers take off in a different area. Literally, everyone on the "dog side" is there with a dog. We have an entire coastline of beach access that is far easier to use where "dogless" folks go. The reason people started using Funston with their dogs is because it was deserted and rather undesirable as beaches go. Ban dogs and you'll just end up with a deserted beach again!

Correspondence ID: 4037 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 27, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean,

My husband and I have been enjoying bringing our dog, Poncho, to Crissy

Field for the past five years since we first adopted him from the SPCA. For the past year we've lived in the Marina and prior to that spent several years in Nob Hill, so going to Crissy Field is very convenient and is a daily part of our routine.

We do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA, and specifically within Crissy. The proposed off leash space is simply inadequate in size to enable the current number of dog owners and their dogs to continue enjoying off leash activities. Furthermore, the proposed beach area at Crissy is not nearly as easily accessible as the main beach where most dog owners currently spend their time.

The proposed changes to the existing conditions of the 1979 Pet Policy are clearly not based upon sound science or long-term monitoring of site-specific conditions. My husband and I consider ourselves environmentalists in that every day we make decisions and take actions that help to preserve our environment. The time we spend at Crissy with Poncho is no exception. We find it shocking and appalling that the GGNRA has targeted dog-owners and their dogs as being the culprits of environmental damage at Crissy Field, thereby warranting the substantial decrease of off leash areas. We find it extremely difficult to believe that the GGNRA's claims can be substantiated based on the extensive time we've spent at Crissy and our consistent experience of dog owners respecting the environment and specifically the restricted areas.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options besides restricting dog-walking access should be considered first. I favor an approach that balances recreational use, including dog-walking access, with preservation. I think that a multi-faceted approach that incorporates education, improved signage and physical and/or vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed compliance-based approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts versus compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

We love going to Crissy because it gives Poncho the opportunity to get the daily exercise he needs that can only be accomplished off leash. His daily exercise is imperative to his health and well-being, which not only impacts our family but everyone with whom he interacts in the city. We are

concerned about the impact of this pent-up energy of all dogs that are accustomed to getting exercise off leash. This affects their interactions with other dogs and of course people as well.

Taking our dog to Crissy is a great opportunity to spend time in nature ourselves and to get away from the hustle and bustle of the city. Having easy access to nature that we can share with our dog is essential to our health and well-being also. Being city dwellers, it's imperative to have an escape that we currently accomplish with Poncho, throwing the ball for him along the main beach at Crissy. The DEIS fails to consider that the GGNRA is the front yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation, including dog walking as a form of recreation, for residents of the Bay Area. NEPA requires evaluation of impacts on the human environment, but the DEIS fails to do so by failing to adequately address how the proposal affects recreational values for these local residents.

The proposed off leash beach area is not easily accessible as is the main beach. For the past couple of years I've had difficulty walking on the sand on several occasions due to physical limitations, and having to walk out to the proposed off-leash area is simply not possible for me in many instances. I can't help but to wonder what legally disabled people are supposed to do to get down to that part of the beach. I realize dogs can go off leash on the grass, which is more accessible. However, my dog has a bad shoulder that does not bother him when he runs on the sand, but becomes a problem on the grass area.

In summary, I support a modified Alternative A (the "No Action alternative"). The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely, Katherine Katz

Correspondence ID: 4038 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:33:18
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean:

I have been a resident of the Marina in San Francisco since 1984. I own my home. For 21 years, I have been walking my dog or dogs at Crissy Field -- OFF LEASH -- perhaps 3 to 4 times each week including at least once each weekend. I spend most of my time with my dogs at the East Beach, on the adjacent grassy areas, and on the promenade. My dogs have been generally well trained and respond to voice control most of the time.

I have quite considerable experience with the interactions of people and dogs at the East Beach and the adjacent grassy areas. I, and most of the other dog owners I have watched and interacted with, have been very careful to pick up our dogs' waste AND we take great care and pride in picking up litter.

I am also a senior citizen, 67 years old. I need to have parking close to the East Beach available for me and my dogs, because it is too far for me to walk to Crissy Field or to walk blocks from far away parking. One of the major reasons I walk my dogs at Crissy Field is the availability of nearby parking. (One of the major defects of the preferred alternative for Crissy Field is the lack of adequate parking near the area where dogs would be permitted off leash.)

The primary reason why my dogs and I go to Crissy field is that my dogs are able get plenty of exercise chasing balls into the water and surf. THEY CANNOT GET SUFFICIENT EXERCISE WHILE ON LEASH -- I am not physically capable of running or exercising with them on leash.

So, both my dogs and I derive tremendous health benefits from our excursions to the East Beach. I get sunshine, fresh air, a modicum of exercise, and social interaction with other dog owners and with beach walkers who walk without dogs. My dogs get sufficient exercise so that they are not over weight; they are able to work off their considerable energy; and they have been properly socialized with, and play with, other dogs and people at the beach.

I strongly disagree with the GGNRA's preferred alternatives for Crissy Field, and for the other GGNRA dog areas, because all these alternatives greatly restrict and eliminate off-leash dog walking. I conclude that the author(s) of these alternatives are biased against off-leash dogs. Worse still, the proposed changes to the existing conditions (1979 Pet Policy) at Crissy Field are not based upon sound science or long-term monitoring of the site-specific conditions. The DEIS simply fails to justify its preferred alternative that would exclude off-leash dogs at the East Beach at Crissy Field.

The GGNRA MUST CONSIDER BALANCED AND REASONABLE ALTERNATIVES for off-leash dog walking its lands. Without doubt, I share most peoples' concern about the long-term preservation of the

GGNRA's natural resources and their desire to protect these important natural areas. But based on my repeated observations and many conversations with recreational users of the East Beach at Crissy Field, I am confident that that area is well-protected from not only off-leash dogs, but also from the many children, sports enthusiasts, and other users of the East Beach.

The GGNRA should consider options other than eliminating off-leash dog-walking access at the East Beach and on the promenade. The current barriers and 1979 Pet Policy embody an approach that balances recreational use -- including off-leash dog-walking access -- with preservation. The GGNRA's constituency is broadly composed of many people, including a high percentage of dog owners. Eliminating all dogs at the East Beach would unfairly benefit one segment of the GGNRA's constituency and punish another.

The GGNRA's proposed "compliance-based" approach punishes far too many dog owners and dogs for the perceived -- NOT ACTUAL, in my experience -- transgressions of a very, very few. I know from personal experience that, by far, the vast majority of off-leash dog owners are responsible in caring for this precious beach and the grassy areas. We clean up after our dogs, we are mindful that these dogs do not interfere with others' use of the beach, and we signal other dog owners who might not be aware of their responsibilities.

The GGNRA should modify its compliance-based approach to create a baseline of current conditions and then measure impacts against compliance. Based on my considerable experience at Crissy Field, I am highly confident the GGNRA would learn that the so-called bases or justifications for the alternatives -- at least at Crissy Field -- have no validity. Indeed, many of the purported justifications for the restrictions are couched in "could's" rather than what has actually happened. The text of the DEIS demonstrates that there is no basis in history or fact for prohibiting off-leash dogs at the East Beach, the promenade, and the adjacent areas.

The GGNRA's DEIS and preferred alternatives establish a hostile and adversarial relationship with dog owners. The GGNRA should instead fulfill its mission by working with the community to find alternatives that do not alienate one segment of the population, which has as much right to use the GGNRA parks and land as others.

The DEIS fails to consider that Crissy Field is one of the front and back yards for San Francisco. The fundamental purpose of creating the GGNRA was to provide open space for recreation -- INCLUDING DOG WALKING AS A FORM OF RECREATION -- for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment," but the DEIS

fails to do this by failing to adequately address how the proposal affects "recreational" values for these local residents. In particular, the preferred alternative for Crissy Field entirely ignores the recreational benefits for the senior citizen, dog-owning community, including those of us who use the East Beach for our own, and our dogs', health and recreation.

Moreover, the GGNRA's preferred alternative for Crissy Field would severely and unfairly penalize senior citizens and those who rely on using the East Beach because of its abundant nearby parking and its ideal environment for exercising their dogs. The GGNRA should not, and cannot realistically, expect us to use only the western beach for walking on the beach and exercising our dogs off leash. That beach is essentially inaccessible due to the great distance away of available parking. The GGNRA should not expect senior (or disabled) citizens to park on the other side of the street and then have to walk all the way across the grassy area just to get to the beach where our dogs can chase balls in the surf and walk with us in the sand. Because of the uneven terrain and hidden holes in the field, the grassy areas is also dangerous for dogs to run on, and for humans to walk on. Because of this danger, that grassy field is ABSOLUTELY NOT a feasible solution for exercising dogs off leash.

I have read the parts of the DEIS for Crissy Field. The preferred alternative, with its accompanying text, purports to provide a fix for something that is not broken, and for something that the DEIS does not and cannot document as being broken.

I support a modified Alternative A -- the "No Action alternative." The current plan could be slightly modified to provide clearer rules, more signage, and education and outreach as part of the overall program. There is no need for more vegetative barriers at Crissy Field. Based on my years and frequency of watching the land within the barriers, I remain confident that these barriers are effective to protect the vegetation. And the snowy plover does not chose to spend time at the East Beach and adjacent grassy areas.

Thank you for your consideration.

Sincerely,

Peter Fortune San Francisco, CA 94123

Correspondence ID: 4039 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:36:27
Correspondence Type: Web Form
Correspondence: Hello...

My name is Marty Jaye & I am a 59-year-old, long-time resident of San Francisco with two active adult dogs. I am also a disabled person who uses a power-operated wheelchair and mobility scooter.

For years my family has enjoyed taking our dogs for off-leash play in the GGNRA, especially at Fort Funston and Crissy Field's East and Central Beaches. Not only are these locations our favorite places to go with our dogs, but they are among very few options in the city providing both wheelchair access and off-leash recreational activity with our dogs.

With daily vigorous activity our dogs are healthy & well-behaved. According to our experience and our vet's opinion, on-leash exercise is simply inadequate for our dogs. When they have had to be restricted to on-leash activity only, they have had both negative behavior issues and weight gain. One of our dogs has a medical condition for which weight gain is very detrimental. We feed them low-calorie food, but our vet has emphasized the critical importance of abundant off-leash exercise.

A primary issue for our family's dog care is my physical mobility. With the GGNRA's current dog policy, paved trails at both Fort Funston and Crissy Field enable me to participate actively in exercising our dogs. According to the Executive Summary, Alternatives B & D would completely bar me from being able to exercise my dogs at Crissy Field and Alternatives C & D would allow some, though very restricted (and likely very crowded) off-leash beach access. At Fort Funston, all options other than Alternative A would restrict off-leash dog activity from all wheelchair accessible trails. This, in effect, makes the area closed to wheelchair users who need to provide off-leash exercise for their dogs.

I strongly urge the GGNRA to reevaluate all alternative options to allow for mobility-impaired park users who need to exercise their dogs off leash. I urge the GGNRA to make it a priority to enable equal off-leash access for mobility-impaired individuals. Alternative A has worked extremely well in this regard.

I also urge the GGNRA to extend ROLAs in all parts of the GGNRA. With only very restricted off-leash areas available, a "ghettoized" situation is created with the few off-leash areas left becoming very crowded, resulting in inadequate exercise possibilities and heightening the potential for difficult behavioral problems--problems that do not crop up when off-leash space is plentiful.

In evaluating potential changes in dog-use policy in the GGNRA in general, I also ask you to consider the following: Many urban areas in the country allow for open, off-leash dog use in tandem with various management tools

to minimize negative impact. Rather than significantly restricting off-leash dog use of GGNRA park land, consider keeping the 1979 Pet Policy with these amendments: clear, attractive signage indicating sensitive ecological areas; clear, attractive signage delineating "good citizen" guidelines for dog-walking park users; and erection of more eco-friendly barriers to protect sensitive/vulnerable areas.

Finally, it is unclear from reading the GGNRA's proposed dog management policies what specific negative impacts there are to the parklands from off-leash dog activity. Data in the DEIS document is not clearly indicative of specific damage that off-leash dogs are causing in each of the GGNRA's areas. Has the GGNRA studied negative impacts caused by humans without dogs or what damage may be caused by natural predators? Without information specifically delineating negative impacts from each of these groups, how can the GGNRA state categorically that off-leash dogs are causing untenable damage?

Thank you for considering my comments.

Correspondence ID: 4040 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:39:43
Correspondence Type: Web Form
Correspondence: Please enlist an independent organization or person to audit and analyze the comments sent to you. An unbiased objective person/group is necessary.

Correspondence ID: 4041 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:40:49
Correspondence Type: Web Form
Correspondence: I do not agree with the plan to restrict off leash (under voice control). Please keep the current areas designated as off leash, off leash. My dog are an important part of my family. Taking her to an off leash areas such as Fort Funston to run and play with other dogs is one of the few areas that she can run. It is also great for me to see her enjoy herself and enjoy nature with her. it is great exercise for both my dog and me. Please honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely, Cheryl Ruble

Correspondence ID: 4042 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979 Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

Correspondence ID: 4043 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft

management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: The plan in itself is unnecessary, as most owners and walkers are responsible. Instead better compliance could be achieved through enforcement of the rules already in place. Park rangers should cite owners who do not exhibit voice control of their animal, and also those who do not clean up their dog's excrement. With the policies in place and the proper enforcement, there will be no actual or perceived threat to the natural habitats the GGNRA consist of. Sincerely, Aaron Feibus San Francisco CA 94131

Correspondence ID: 4044 **Project:** 11759 **Document:** 38106

Received: May,30,2011 18:48:27

Correspondence Type: Web Form

Correspondence: Dear Sir, This is my final plea for you to reconsider removing the off leash areas of the GGNRA. I am a life time responsible dog owner and enjoy the walks I take with my dog daily. I live along the Great Hwy and utilize Fort Funston occasionally. My daily walks with my dog allow me to walk safely and allows both of us to get exercise. Fort Funston allows us to have a leisurely hike with the paths. We live in an urban area. If the off leash areas are taken away, you will remove our reason for going to Fort Funston and force us to walk around the city streets. I am sure it will be more of a burden for folks who are afraid or dislike dogs and would probably make more folks complain.

There are plenty of parks and areas for people who do not want to be around unleashed dogs. There are very few places for people with dogs to enjoy recreation in the city. I do not take my dog to GG Park because it is more populated with tourists and I respect that.

There are irresponsible people in our city/county/state/country. There are irresponsible dog owners too. I hope that you will realize that most dog

owners follow rules, police their dogs and are respectful to our fellow citizens. There are so many arguments for and against having the off leash requirements. I hope you will keep those of us who would like to enjoy our environment while we still have it. For those of us who utilize Fort Funston, please understand that our pets have enjoyed the leash free freedom for years and to have that taken away is punishment for many wonderful people and pets.

One last comment I would like to make is that for those studies that blame the dogs for the condition of Fort Funston/Great Hwy. Please know that the sea and wind have created the ruggedness of the coastal area. Not the dogs. It is naturally beautiful without the unmaintained 'fences' along it's paths. Please don't blame the dogs for the sand covering up the man-made barricades.

Thank you for your time.

Correspondence ID: 4045 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:49:40
Correspondence Type: Web Form
Correspondence: I BELIEVE IT IS IMPORTANT TO THE QUALITY OF LIFE OF OUR BEAUTIFUL AREA TO BE ABLE TO BRING OUR DOGS, WHICH ARE LIKE FAMILY, TO SAFE, OFF LEASH, PARKS.

WE PAY A LOT OF TAXES TO LIVE HERE, HAVING A RECREATION AREA FOR OUR DOGS IS NOT ASKING TOO MUCH.

THANK YOU.

Correspondence ID: 4046 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30, 2011

Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

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The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Correspondence ID: 4047 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:54:00
Correspondence Type: Web Form
Correspondence: **Please: No New Leash Restrictions at Fort Funston**

This comment will urge the Golden Gate National Recreation Area to adopt no new restrictions to off-leash walking at Fort Funston. Before I expand on

that point, I'd like to share a few words about my connection to this place.

****Why I Care About This****

I'm a lucky person: I grew up in a family that taught me to appreciate life. Even better, they taught me to do it in one of the most beautiful corners of the globe: the Golden Gate National Recreation Area.

I was born in 1970, and when I was growing up, weekends meant trips to the many GGNRA jewels: Ocean Beach, Baker Beach, the Marin Headlands, Point Reyes, Muir Beach, Mount Tamalpais, Rodeo Beach. And since we lived in Daly City, they meant, more than anything, a quick 3-mile drive down Skyline Boulevard to Fort Funston.

My uncle Lawrence Pizarro was an Air Force veteran of Vietnam. For a while he came to San Francisco for frequent cancer treatments at Letterman VA Hospital in the Presidio. Whatever the purpose of his trip, when he came we counted on at least one jaunt to Fort Funston to "look at the waves," a delight he had little opportunity to enjoy near his home in the central valley. We climbed the dunes and dangled our feet off the cliff as the Pacific swallowed his gaze and the waves below us swished in and out. It was on excursion like these at Fort Funston that I started to learn how (and why) to capture a moment and inhabit it.

As an aviator, my uncle also enjoyed watching the hang gliders. He died twenty years ago, and today, over thirty years after our walks through the Battery Davis tunnel (back when it was still open to walkers), I still cannot go to Fort Funston without recalling how he taught me to watch and hear the way the hang gliders climbed on the wind and cut through it while quietly swishing past us on the observation deck.

To me, Fort Funston isn't a place to walk. It's a place I go several times a week to restore myself and to reconnect with the things I value most: my family, my past, my heritage, wonder, science, the natural world. It is a place my family and I treasure and one that will always be home to some of the best, most important memories of my life.

I mention all of this as I comment on the GGNRA's dog management plan because I wish to give proper context to my comments. I am not writing on behalf of a cause, a species (either domesticated, threatened, or endangered), a movement, a group, an industry, or a financial interest. I am writing because I am a person who grew up in the GGNRA, because I love the place, and because I hope the GGNRA will allow me to continue enjoying one of my very favorite things in the world: roaming Fort Funston with my dog, neither one of us tethered to the other.

****The Human Benefit of Off-leash Dog Walking****

I'm convinced that, by fixating on dog needs and dog welfare, the current debate on dogs in the GGNRA is missing an important point: the value of off-leash dog walking should be measured in what it does, not for dogs, but for people.

My dog enjoys our walks at Fort Funston, it's true. But selfishly I'm much more concerned about the effect that leash restrictions there will have on me and on the thousands of other people who take pleasure in seeing their dogs enjoy Fort Funston. The debate should not fixate on the welfare of dogs; instead, it should consider the unique and irreplaceable benefit that people derive from walking with our dogs off-leash.

If the GGNRA restricts off-leash dog walking at Fort Funston, it will restrict one of my very favorite things in life. Indeed, it will do this to the thousands of people who love exploring and appreciating this beautiful place with their dogs.

****On-Leash Dog Walking is Fundamentally Different from Off-Leash Walking****

I'd like to make sure the GGNRA understands that walking dogs off-leash is qualitatively different from walking dogs on-leash.

A leash is a tether. It ties a person to a dog. Of course, this is a legal, practical, and safety necessity in most areas outside the home. And while leashes are an effective means of protecting people, dogs, and public interest in most situations, this protection comes at a price for dog people: it forces us to be tethered when we leave home with our dogs.

A typical, enclosed, urban dog park offers welcome relief from the tether. But most such dog parks are small. In these parks, neither the dogs nor their people have room to explore and roam. These are important places, and they give our dogs the opportunity to exercise and socialize, but these benefits come at the cost of confinement. People can't get in much of a walk with our dogs at the typical urban dog park.

To dog owners, a safe off-leash area for dogs like Fort Funston is more than a luxury, it is a place where the creatures we love have a rare opportunity to do what evolution and breeding created them to do: roam, explore, run, play, search, retrieve, and more. Dog people simply treasure the opportunity to see the canine members of our families engage in these activities in a safe place.

Remember: this is about people: Fort Funston is a place where dogs can do

what they were meant to, and this brings singular joy to the thousands of people who love those dogs.

We can recreate parts of this equation at some enclosed dog parks. But Fort Funston offers an additional benefit: it is a place where people can not only watch our dogs do what they were meant to; it's a place where we can engage in these same activities alongside our canine family members.

This is a luxury that exists in precious few other places. Something you'll hear frequently at Fort Funston and other dog-walking treasures like Crissy Field is that these wonderful places are one of the reasons many dog people are willing to pay the Bay Area's exorbitant cost of living. World-class, dog-friendly resources like Fort Funston are part of what make our region so enviable.

Requiring leashes at Fort Funston will destroy the unique and irreplaceable benefit that thousands of people currently and regularly derive from the place.

We run. We walk. We exercise. We relax. We connect with other people and dogs. We enjoy the spectacular views. And at Fort Funston, we do this at a place where these activities have minimal effect on others.

****Who Besides Dog People is Using Fort Funston? ****

Hang gliders. Model aircraft flyers. Horseback riders. Picnickers. Walkers who are there without dogs. Beachgoers. There are many reasons people visit Fort Funston, but the truth is that it's not an area intensively used for any of these other purposes.

With that in mind, it is a place where off-leash dog walking is apt to have the least effect on others.

Given its use, especially compared to other areas in the GGNRA, Fort Funston is a perfect place for off-leash dog walking.

****But Dog People Do Have an Effect on Fort Funston****

It's true. Off-leash dog walking at Fort Funston has an effect on people who don't own dogs. It's important that dog people acknowledge this fact: we do have an impact, not only on people who don't like dogs, but also on the ecosystem, on the park staff and more. I'd like to say a few things about that.

****People Who Don't Want to Be around Dogs Have Many Other Choices in the GGNRA****

People who do not want to be around dogs have far more choices in the GGNRA portfolio than off-leash dog walkers do.

Taking Fort Funston away from off-leash dog walkers won't significantly increase the options for people who don't like dogs, but it will significantly harm those who enjoy off-leash dog walking.

****GGNRA: Please Clarify Habitat and Off-Limits Areas at Fort Funston****

At Fort Funston, you'll sometimes see people and/or dogs exploring beyond fences and beyond the areas once delineated by now-broken or missing fences.

The consensus among dog people at Fort Funston is that they'd be happy to respect any and all currently off-limits areas, whether they are for safety or for the restoration of native habitat. But the consensus also says that it's unclear where you are currently prohibited to walk at Fort Funston. With a few fence repairs and well-placed signs, the GGNRA could clarify which areas are currently off-limits. Dog people at Fort Funston agree: this would virtually eliminate the encroachment of dogs and dog walkers on these areas.

Dog people tend to be advocates for nature and wildlife. They are a constituency that is inherently receptive to efforts to protect habitat and species. In the dog walking community at Fort Funston, the GGNRA has a natural ally: a group that treasures this place, a community that would happily respect thoughtful limits sincerely intended to protect native habitat and species, a volunteer pool that would enjoy working together to help restore the natural beauty of the place we love, and a responsible group ready to police itself to encourage other dog walkers to respect any and all clearly set and meaningfully derived limits.

Really, this is what dog people at Fort Funston are always talking about.

Also: during this debate, the notion has been put forth by some members of the public that dogs are responsible for threatening species at Fort Funston. I assume the GGNRA is sufficiently knowledgeable about the issues to recognize that dogs are not to blame for the loss of native habitat there. As one of the GGNRA's signs at Fort Funston notes:

"Originally, Fort Funston's vibrant dunes were covered with a thick carpet of native wildflowers, including beach strawberry, Indian paintbrush, coyote bush and seaside daisy. These plants formed the basis of a strong food chain supporting birds and mammals, as well as insect life, fungi and microbes. Bulldozers cleared away native plants to make way for Battery Davis in the 1930's. Soldiers subdued the resultant blowing sands with some native

plants as well as iceplant, an invasive South African succulent. The iceplant soon covered the cleared dunes and replace much of the native vegetation. As the native plants disappeared, so did the wildlife that depended on them, such as quail, fox and rabbits."

When the GGNRA is ready to take advantage, it will find a vast, untapped volunteer labor pool that will turn out en masse to help establish, clarify, and police restricted areas.

But the restricted areas should not include any of the areas that are not currently restricted, for example the area along the cliff north of the observation deck, the ice plant area north of the parking lot, the ice plant area northeast of the parking lot, the trails marked as "Leash Required" on the Preferred Alternative in the current proposed Dog Management Plan and the areas marked "Regulated Off-Leash Area" in the current proposed Dog Management Plan.

****And Speaking of Policing: Poop****

Look down next time you're at Fort Funston and you'll see another of the impacts that dogs have there.

I think this is one of the principal failings of the dog walking community at Fort Funston. It's inevitable in an off-leash walking area that your dog will poop in a place that's difficult to find and even harder to reach.

We need to change people's understanding of their own responsibility here. It's never okay to fail to pick up after your dog. It's always okay to point out to another dog owner when they happen to have missed their dog's poop.

And we need to appreciate the GGNRA for reliably sending its staff around Fort Funston to empty the garbage cans that equip us to keep this place clean.

I think a few signs and roaming volunteers spreading the word about how unretrieved poops harm every dog owner at Funston could completely change the gestalt about our responsibility to pick up our dogs' poop.

****We Need to Prevent Dog-Horse Interactions at Fort Funston**** Like many dogs, our last one, a docile bunny rabbit trapped in dog's body, turned into wild, snarling animal at the site of a horse. And many of her compatriots in the canine community, share the same strong feelings about horses today.

As a group with shared interests, the dog people at Fort Funston can and need to do a better job of preventing horse-dog interactions. With a little encouragement from the GGNRA, (and again perhaps a few additional signs

and volunteers), we could easily create momentum that would encourage dog people to leash up whenever they saw a horse.

****We Need to Keep Our Dogs Away from People at Fort Funston Who Don't Want to be Around Dogs****

There are, of course, people who don't like dogs at Fort Funston. These folks have a right not to be sniffed, licked, loved, or otherwise inspected by our dogs, and dog people need to do a better job at reading other folks' body language, noticing when their dogs' attention is unwanted, and stopping it.

****Dogs Promote Diversity at Fort Funston****

One additional point here: because Fort Funston is such an extraordinary place, it attracts all kinds. It is of few places in the Bay Area where people of all races, classes, ages, backgrounds, political orientations, etc. gather. And because many of us gather there because of a common reason (our dogs), it's also a place where people from different backgrounds actually talk, share, and get to know one another.

Because of our dogs, Fort Funston is a place where the Bay Area converts our region's diversity from a potential asset to an actual one. I love this about Fort Funston, and I'm certain that restricting off-leash activity at Fort Funston will do what it does to foster community across racial, ethnic, and other stubborn lines.

****One Last Time: Fort Funston is a Place Where People Thrive because Their Dogs Do****

No one is entitled to take their dogs off-leash. No one owes dog owners that privilege.

But dog owners would love the chance to work with the GGNRA to display just how well off-leash dog walking can work for all people who want to use Fort Funston.

Go out to Fort Funston, ask around, and you'll find the same thing: dog people are ready to pitch in and care even better for the place we love.

There are plenty of places where people can avoid dogs, but there are precious few that offer the dog walking community what Fort Funston does: a place where people thrive because their dogs do too.

Dog people are ready to work to make Fort Funston a model of community-government collaboration that sets a new standard for well managed,

respectfully used, self-policed, off-leash, dog friendly areas.

Dog people love this place and look forward to working to make it even better, cleaner, safer, and more welcoming for everyone who wishes to share this gem with us.

Correspondence ID: 4048 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:54:33
Correspondence Type: Web Form
Correspondence: compliance with (36 CFR 2.15) is not a valid motivation for a change from the 1979 Dog Management Plan. The GGNRA is *not* a National Park, it is a National Recreational Area. The existing practices prior to the area becoming a GGNRA and the 1979 provisions along with the existing endangered species provisions are adequate for the mixed use of the recreation area.

Correspondence ID: 4049 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:56:06
Correspondence Type: Web Form
Correspondence: I have lived in Marin since 1960. My father was instrumental in conceiving of and obtaining the first railroad rightaway for the bicycle paths, he was on the first BCDC (with Senator Feinstein), and is currently on the board of Audubon. I explain this to show our family has always had strong environmental appreciation/preservation beliefs.

I asked him how he thought dogs could harm the environment differently than other animals to warrant a special ban. He couldn't think of anything! We talked about ground-nesting birds, yet raccoons, coyotes, and humans are just as dangerous-more so for the first two-to the birds. All of the animals poop; only the dogs' are picked up and removed. The birds don't appear to be scared of or by dogs. If you ever watch a dog swimming or running towards one, they wait until the last minute before moving, and then only move a short distance away. The birds appear as if they're teasing the dogs, frankly.

Please don't make a special ban for dogs. All animals should be allowed on GGNRA.

Correspondence ID: 4050 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:56:11
Correspondence Type: Web Form

Type:

Correspondence: I won't comment on some of the factual issues with the report, since countless other have already done so. The bias in this plan is obvious to any reader - the committee clearly seeks to severely restrict access for dogs on GGNRA lands. For over 30 years, dog owners have been given access to PUBLIC LAND for their use & enjoyment. The committee has not bothered to provide alternatives in the form of providing additional off-leash areas to offset the vast swaths of land being designated on-leash or no access. This land is within urban environments and as such is regularly subject to pollution, human activity, noise, smog, and many other urban issues which are contrary to "restoring the habitat". Singling out dogs as an environmental menace is simply unfair. The land is in an urban area and is meant for the ENJOYMENT OF EVERYONE. Not just naturalists, the committee, scientists, or all the other tiny special interest groups who have had an outsize impact on writing this plan. Urban environments, especially San Francisco, have significant numbers of dogs and dog owners. This land is meant for the use of the general public, and in certain areas, such as Fort Funston, the majority of the public visiting those areas are dog owners.

Of course, there are always people who break the rules. They don't pick up after their dogs, they are walking a dozen dogs at a time and not paying attention, they cannot control their dog by voice but still allow it to roam off leash. In every group there are "bad apples" to punish everyone because a minority are not in compliance is heavy handed and unnecessary. If the real concern is the resources to manage the areas, then set up a permit system to collect funds and fine offenders. Eliminating almost all the off-leash walking areas won't prevent people who aren't going to follow the rules. They still won't and the problem will not be solved. Enforcement of existing rules will make the parks enjoyable for everyone and not alienate a significant portion of the public.

Given that the vast majority of comments received are extremely negative, the committee should seriously reconsider its ill-advised course of action. I am strongly in favor of Option A with additional enforcement and/or permit requirements.

Correspondence ID: 4051 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979 Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

off leash parks are a staple for responsible dog owners -- exercised dogs are safe dogs.

Correspondence ID: 4052 **Project:** 11759 **Document:** 38106
Received: May,30,2011 18:59:31
Correspondence Type: Web Form
Correspondence: Penny Keating Pacifica, CA. 94044-3959

May 30, 2011

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

Dear Mr. Dean and Associates,

For months now I have felt anxious and depressed over the draft GGNRA dog "management" plan. I am 64 and have gained a great pleasure from walking and running with my dog(s) since I was a child growing up in San Francisco when there were hills to run in.

I have been walking and running my dog(s) in Pacifica and near by bay area open spaces for many, many years. It gives both me and my dog(s) a great sense of happiness, being alive and connection to the earth to walk/run in nature. It is a necessity for my dogs to have space to run. I cannot keep up with them for a good workout. I have used an extension leash and also an electronic leash which allows for full control while they are off traditional leash. Just the sound brings them into instant alertness to my command.

I find that the majority of people on the beaches also find joy in the absolute "in-the-moment" joy we see in our dogs running, playing, interacting with other dogs and people on the beach. I am VERY aware of the need to have a well behaved and well trained dog and to be a good steward by cleaning up after my dog(s). I also always carry a bigger bag to pick up the litter left behind by other beach-goers, fishermen and boats.

I am the daughter of an environmentalist whose hero was John Muir and I was raised to see the natural world as sacred. I grew up seeing the open spaces as my cathedral. I care deeply for my cathedral and its' beings.

I feel that my rights to freedom of "religion" and happiness are being greatly threatened.

Some years ago a group of dog walkers including myself, started the

Pacifica Beach Coalition to clean the beaches among other important missions. Our group has grown over the years. Those early-concerned dog-walking members have been running clean-ups for over 10 years because they are on the beaches and trails everyday and THEY CARE!!! This year there were something like 4,000 volunteers to help our earth day event manned and promoted by the Pacifica Beach Coalition and many of the early dog-walking/environmentally concerned volunteers.

I see many flaws in the "research" presented to back up a plan that is greatly unbalanced.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Penny Keating

Correspondence ID: 4053 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:00:40
Correspondence Type: Web Form
Correspondence: I am writing about the proposed ban on dogs in the newly added GGNRA

area next to Montara Mountain. I would strongly encourage you to reconsider this ban. This is one of the few areas left that dogs can run free and the reason I moved here. I keep my dogs close to me when we run, and keep them out of sensitive areas. I am a biologist and a science teacher so I am aware of the need to keep native plants and animals safe. It is also important however to have areas that are open for free recreation. In this era of shutting down state and government facilities, please don't take this one from the community who has supported so strongly in the past. Thanks,
Leni Liakos

Correspondence ID: 4054 **Project:** 11759 **Document:** 38106

Received: May,30,2011 19:01:40

Correspondence Type: Web Form

Correspondence: As a professional dog trainer in San Francisco I cannot stress enough the importance of preserving the off leash areas in the GGNRA. By restricting these areas, dogs will get less healthy exercise, which not only affects their quality of life, but also the quality of life (not to mention the safety!) of the entire community. I specialize in rehabilitating shy, fearful and aggressive dogs. If dogs do not have the appropriate exercise natural progression tells us that it's likely that we'll see an increase in fear, anxiety and aggression.

I have been taking my own dogs to Ft. Funston and Crissy Field for the past 9 years, and in all this time have never witnessed anything more dangerous than a rousing game of chase. To lose these two areas will impact my life, the lives of my dogs, as neither is the type to enjoy the enclosed dog play areas in San Francisco.

If it's true that only a fraction of the dogs who live in the SF are registered with the city, and that this small number is what inspires the building of designated dog play areas... at this point we already do not have enough space to exercise our dogs. I cannot imagine what the current city parks will look like if these open spaces are taken away.

I would like the existing areas to be preserved, and the fragile habitat areas marked clearly, and fenced off to avoid trampling and damage. I would also like to see an expansion to the legal off leash areas in the GGNRA in the future.

Correspondence ID: 4055 **Project:** 11759 **Document:** 38106

Received: May,30,2011 19:02:37

Correspondence Type: Web Form

Correspondence: The report appears to make no attempt to analyse the relative usage of each

of the areas by category, i.e dog and non-dog and the impact on the area outside of the GGNRA if the dog users are excluded and/or constrained by the changes proposed.

e.g, by simple estimation the majority of usage in ft funston is dog walking, yet no statistical analysis has been preformed and no subsequent analysis of the impact of the changes proposed.

This appears to be a bias fundamental in the intent of the report, only the 'environmental' impact has been considered.

Additionally no historic statistics have been presented to support any unacceptable increase in dog related 'issues' the report is purely speculative in this regard. This appears to be another biased omission intent in avoiding real analysis, and replacing it with 'opinion' unsubstantiated by fact.

Correspondence ID: 4056 **Project:** 11759 **Document:** 38106

Received: May,30,2011 19:03:56

Correspondence Type: Web Form

Correspondence: Thank you for making a plan to try to control dogs in the GGNRA. But I don't like the preferred alternative plan, I think it does not give enough protection to people or to wildlife or the land, and beaches. I like dogs and it would be nice if there were more parks just for them but I think you need to do more to control dogs at Ocean Beach, Chrissy Field, and other beaches and at other parts of the GGNRA because most dog owners either do not understand the affect their dogs have, or don't know how to train their dogs, or maybe they just don't care.

I have been fishing at Ocean Beach for almost 30 years, and Chrissy Field, and other Presidio beaches since the Army left. I have seen many dogs create problems at both places. I have been attacked by dogs at the beach near Fort Funston, at other parts of Ocean Beach, at the wildlife zone at Chrissy Field and at the part of the beach just west of the Saint Francis yacht club. They did not bite me but I was very scared. Two of those times the dog owner was mad at me for trying to scare their dog away even though their dog almost bit me.

At Chrissy Field some fisherman go very early in the morning because when the dogs come and splash in the water it scares fish. Some fish come very close to shore but leave if dogs are in the water. Most of Chrissy Field is spoiled for fishing most of the day and for any other activity than running dogs because of all the dogs there.

I have seen dogs off leashes attack horses at the beach near Fort Funston and

attack other dogs and other people at Ocean Beach, and Chrissy Field. I don't know about horses on beaches but this is about dogs. You should not let dogs without leashes in any part of the GGNRA at any time. Most people cant control their dogs even on leashes, and almost none I see in the GGNRA or in San Francisco can control their dogs at all just by talking to them without leashes.

I see many dog owners ignore the rules about dogs at the wildlife area for Chrissy Field but I have never seen anyone get a ticket for that. Most of the time I see the same people doing it again another day even if a GGNRA person talks to them. Most dogs I see without leashes chase birds, which does not look that bad but I have read it is bad for the birds.

I know fishermen who have had unleashed dogs steal their bait and one who was fishing when a dog ran up and grabbed his lure and got hooked.

I have seen many dog owners let their dogs go to the bathroom on the beach and I often find plastic bags filled with dog waste on the beach.

I have read some dog owners say there is not enough areas to take their dogs and GGNRA beaches are next to San Francisco which is a big city. I don't think this matters because it is what a dog does in the GGNRA that matters.

I am getting older and I am worried about what might happen in the future if a dog tries to bite me and I am too old to dfend myself. Sometimes I am the only person around except for the dog owner, who may not catch a dog in time. I see some older people fishing sometimes and I wonder what would happen to them.

About how I would like to hear about future reports, meeting, other info: I read local news websites. I did see some areticles on neighborhood news websites but never saw any ads or announcements from GGNRA on them. I would like to see GGNRA announce some of these things on local news websites, in addition to the news areticles they write.

Correspondence ID: 4057 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:08:37
Correspondence Type: Web Form
Correspondence: I oppose the proposed dog management plan

My best friend died suddenly this week, and I am writing on his behalf, too, because this issue is so important. He loved seeing the dogs frolic on Crissy

Field beach and went with me several times to Fort Funston.

GGNRA is supposed to be for all of us to enjoy. Almost 40% of all households own at least one dog, and almost 70% of all homeowners own at least one dog.* It is disingenuous to make it is dogs vs. people or dogs vs. birds. This is about people who wants to enjoy the parkland and beaches we pay a lot of money to support and exercise our dog at the same time. A dog doesn't care where he is, just who he's with. So this is about me, the human.

Danger? No dog is born dangerous to humans; they can only be trained or mistreated into being so. It's extraordinarily rare when compared to the danger of humans to each other. My wife would never dream of going out on a hillside trail alone without our dog because she'd worry about the male humans hurting her, not a dog. Statistically, the odds are phenomenally greater that another person, not a dog, hurts a person. We'll never forget the Trailside Killer in Marin.

Correspondence ID: 4058 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:10:11
Correspondence Type: Web Form
Correspondence: Frank Dean GGNRA Superintendent

Darn Mr. Dean:

I have lived in the Marina in San Francisco since 1984 and for 21 years have exercised my dog or dogs at the East Beach, the adjacent grassy areas, and the promenade (since it was built). I write again to add another fatal criticism of the DEIS for the so-called preferred alternative for Crissy Field. I have years of firsthand, eye-witness experience at Crissy Field with off-leash dogs, beach users, picnickers, and the protection of the vegetation, as well as the snowy plover (to which a section of the west beach is dedicated, without dogs, for a period of time each year).

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In far too many places, the DEIS treats the environment and recreation as adversarial values: the DEIS erroneously assumes that recreation only harms natural resources. That document utterly fails to acknowledge that people care about both recreation and natural resources, and that most all of the people with off-leash dogs at Crissy Field and the East Beach are responsible, careful stewards of our environment. We pick up our dogs' waste; pick up litter; signal other dogs owners to pick up their dogs' waste; and advise diligence in watching dogs to ensure they do not interfere with others' enjoyment of the beach and grass y areas. This bias in the DEIS is especially salient in the discussions relating to Crissy

Field; the false justifications for the so-called preferred alternative pits recreation against natural values and erroneously assumes that harm "could" result to the environment, when there is overwhelming evidence to the contrary. To the extent that any fix" is needed for something that is definitely not broken, the DEIS fails to identify or explore reasonable alternatives where nature and recreation can and do thrive together.

Not only is there no specific evidence of any significant PAST degradation at Crissy Field and East Beach. The proposed broad limitations in the DEIS for the East Beach and Crissy Field as a whole are largely without site-specific science demonstrating that the ANTICIPATED degradation of the quality of the natural resources would actually be attributable to off-leash dogs as opposed to other factors. There are so many other users of that area (e.g, children with inattentive or irresponsible parents; sail boarders; alcohol users; picnickers; sports participants; beach litterers) that the DEIS fails to consider as potential causes of any anticipated degradation.

For Crissy Field and the East Beach, I urge you demand that the DEIS contain actual justification for changing the current status quo. Based on m 21 years of walking my dogs off leash in the grassy areas the East Beach and the promenade, I am confident that you will conclude that the environment and beach users are protected by the 1979 Pet Policy and the vast majority of responsible dog owners whose dogs are off leash there.

Thank you for your consideration.

Peter Fortune San Francisco, CA 94123

Correspondence ID: 4059 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:13:34
Correspondence Type: Web Form
Correspondence: I am totally opposed to the concept of the ROLA areas; in particular the ability of the NPS to arbitrarily change the status of such areas based on their sole evaluation of the compliance etc without further public comment or input.

based upon the behavior of the authorities to date I have no confidence that the NPS will not use this provision to subsequently exclude all dogs from the proposed areas.

Correspondence ID: 4060 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:15:42
Correspondence Web Form

Type:

Correspondence: I support maintaining the current, traditional off leash dog regions on GGNRA property throughout the Bay area which have been in place for decades. As has been demonstrated by public space planners, dog owners and open space enthusiasts, restricting these areas to leash only space will only crowd municipal parks and reduce an important cultural, health and community activity for many Bay area residents.

A critical oversight in the GGNRA's assessment was their decision to use a literature search and not real time water and soil sample analysis on which to base their decision. This means there was no actual testing of soil or water quality over a period of time during which dogs were present on the open space in question--instead the GGNRA used case studies from other sites with similar characteristics on which to make their determination.

Bad science makes for bad decisions and misleading data. Bay area dog owners deserve much better--

The dog community contributes significant revenue to the tax base of its respective communities. We're looking at 1% of the total area of the GGNRA--we deserve to give our dogs at least that--if not more.

1% for dogs and their owners--it worked for decades, keep the current program and open off leash space in place.

Correspondence ID: 4061 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:16:22
Correspondence Type: Web Form
Correspondence: I am supportive of Chrissy Field map option E this provides the best balance of dog and non-dog access and usage.

Correspondence ID: 4062 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:18:27
Correspondence Type: Web Form
Correspondence: Off leash dog parks are essential to the health of animals who are spending most of the day in a small confined area. These beaches/parks should remain off leash to ensure a thriving community of humans and their canine companions.

Correspondence ID: 4063 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:21:13

Correspondence Web Form

Type:

Correspondence: Is this a solution in search of a problem?

Of all the animals allowed on GGNRA land-mountain lions, deer, raccoons, coyotes, rabbits, snakes, wild boar-will any of them: - Sacrifice their life to protect a human? - Help soldiers during wartime? - Help the Navy Seals capture Osama bin Laden? - Lead the blind? - "Hear" for the deaf? - Assist the physically disabled? - Capture criminals? - Stay with a toddler overnight until help comes rather than run home? - Jump through a car window, then lean back in to pull the baby out of a burning car rather than just run away? - love unconditionally, caring not whether I am rich, poor, fat, thin, pretty or plain, have a big house, or a fancy car?

No. So why are dogs the one species you want to ban?!! There's no scientific evidence for this proposal. PLEASE VOTE AGAINST IT

Correspondence ID: 4064 **Project:** 11759 **Document:** 38106

Received:

May,30,2011 19:24:10

Correspondence Type: Web Form

Correspondence:

Dear Superintendent Dean,

I have lived in the Sunset in San Francisco for 14 years and have owned a dog for the last two years. I regularly visit GGNRA lands to enjoy hiking, beach access, and historic sites. Since owning a dog, I have continued to take advantage of the opportunities for recreation in the GGNRA. I take my dog to Crissy Field once a week and to Fort Funston about once a month. I am a responsible dog-owner who walks with my dog under voice-control, who respects areas of the GGRNA that are restricted to dogs, and who always cleans up after her dog.

I have read the Draft Plan/Draft Environmental Impact Statement (Plan/DEIS) for Dog Management in the GGNRA that was released in January, and I feel that there are significant flaws in the document. The DEIS provides no site-specific studies or evidence to support its strongly stated conclusion that allowing dogs access to limited areas on the GGNRA results in a negative impact on those areas.

The studies that are referenced in the document are often decades old and are based on research done in places as removed from the GGNRA as Virginia or Colorado. Additionally, these studies present contradictory conclusions about the severity of impacts due to dogs. The final conclusions of the DEIS claim studies prove that dogs have a significant negative impact of the environment, but the Boulder, CO study referenced in the document

demonstrates that off-leash dogs did not travel far off-trail and rarely disturbed other people, wildlife, vegetation, or bodies of water. Another study states that dogs traveling on a trail with screening vegetation are unlikely to even encounter, let alone disturb, wildlife. Water quality sampling in the GGNRA at some sites that are currently accessible to dogs has shown that "the quality of water bodies throughout the park is generally acceptable for sustaining aquatic life." The DEIS cites the Crissy Field tidal marsh as a particularly healthy body of water, even though Crissy Field is a widely used off-leash dog recreation area. These conflicting data should put the conclusions in the DEIS about dog impacts into doubt, but instead the document clearly treats them as indisputable fact.

Another weakness of the DEIS is the failure to prove that any documented negative impacts on the area are due specifically to dogs. Because site-specific studies of GGNRA lands do not exist, there is no way to determine the extent of any negative impacts or to distinguish between impacts from dogs or humans. For instance, the DEIS refers to erosion as a major concern at Fort Funston and cites digging and climbing on cliffs by dogs as the cause. However, I have frequently seen adults and children climbing up the coastal cliffs at Fort Funston and, surely, dogs are not responsible for the graffiti that can be seen carved into the cliffs. I have also witnessed people walking on the dunes at the southern end of the Fort Funston beach and using paths other than the sand ladder to travel between the upper section of Fort Funston and the beach. This behavior must significantly contribute to erosion at the site, but no reference to human impacts on Fort Funston are mentioned in the DEIS. Also, the DEIS states that after certain areas of Fort Funston were restricted to dogs, an increase in bird presence was documented. This is cited as an example of a negative consequence of allowing dogs at Fort Funston. However, this land closure also prevented human access to these areas, which should also be considered when drawing any conclusions about impacts to wildlife.

The DEIS describes the many at-risk species that can be found in the GGNRA and justifiably states that the GGNRA lands contain important, biodiverse communities. The DEIS does not, however, provide clear documentation of the overlap of most of these species with areas currently accessible to dogs. Under current regulations, less than 1% of the GGNRA is accessible to dogs, and the DEIS does not prove that this small amount of land has a detrimental effect on the overall populations of these at-risk species. In cases like the snowy plover where there are clearer data, the DEIS again does not distinguish between the impact of the presence of dogs, on- or off-leash, and the presence of humans in the birds' habitat.

I feel the GGNRA has not based their conclusions regarding the negative impact of dogs on recreation area lands on solid, scientific evidence. The DEIS repeatedly lists negative impacts that "could" occur at the 21 sites

under review but provides no studies showing these impacts are in fact occurring and that they are the result of the presence of dogs. As a member of the community who enjoys visiting the GGNRA regularly, I ask that the GGNRA responsibly study this problem and support their case with rigorous, scientific data before restricting access to the GGNRA for a significant population of frequent visitors.

Thank you for considering my comments,

Sarah Green

Correspondence ID: 4065 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, We have a well trained Golden Retriever. She just passed the AKC Canine Good Citizen test. We believe it is the dog owner's responsibility to have a well trained dog and to always pick up after your dog. We live in the Marina and walk her to Crissy Field about three times a week. We are members of NRDC and are very concerned about protecting the environment. We are always respectful of the protected areas at Crissy Field.

I'm a senior citizen and an important part of my exercise program is walking my dog off-lease at East Beach. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The

DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Vicki Haggin San Francisco, CA 94123

Correspondence ID: 4066 **Project:** 11759 **Document:** 38106

Received: May,30,2011 19:25:06

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I am writing to oppose the GGNRA's Draft Dog Management Plan because exaggerations of the potential impacts of the "No Action" alternative are found throughout the document, while in all other alternatives there is an assumption that there will be compliance.

It is illogical to assume that if there is compliance, there will be a decrease in resource degradation. To correct these exaggerations, I ask that the GGNRA do an analysis on the current management strategy, which would mean that park rangers could provide education, dog owner training, better signage, and fencing off of sensitive areas to the endangered shore birds and wildlife. Instead of closing an area to dogs or eventually humans altogether, the current management strategy can enforce the above means to curtail the potentiality of noncompliance.

Thank you for your consideration.

Sincerely, Tszsan Kathy Reichardt

Correspondence ID: 4067 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the

existing "1979" Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

While I believe that protection of sensitive areas is a concern, there needs to be more than anecdotal tales of dogs impacting sensitive areas. Responsible dog ownership can add to the enjoyment of public areas by all citizens.

Correspondence ID: 4068 **Project:** 11759 **Document:** 38106

Received: May,30,2011 19:30:18

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I have been a resident of San Francisco for 14 years and I am a frequent visitor to several sites within the GGNRA. I have owned a dog for two years and enjoy hiking with him in the GGNRA, particularly at Crissy Field and Fort Funston. I recognize the importance of responsible dog ownership and I always have my dog under voice-control when he is off-leash and I also clean up after him.

I have read the Draft Plan/Draft Environmental Impact Statement (Plan/DEIS) for Dog Management in the GGNRA that was released in January, and I believe the analysis of the "No Action" alternative (Alternative A) is not handled properly, resulting in a bias against this plan option.

The analysis of the "No Action" alternative assumes essentially total noncompliance with current regulations, whereas the analysis of the other four alternatives assumes the opposite,-extensive compliance with the new regulations. The "No Action" alternative analysis also assumes that noncompliance with current regulations results in significant damage to the sites despite a lack of scientific documentation establishing this fact. This unequal analysis of the proposed alternatives creates a bias against the "No Action" alternative since the assumption of compliance for the other alternatives guarantees they will always have a lower impact on the area.

The DEIS repeatedly states that monitoring of compliance with dog regulations at sites throughout the GGNRA has been inconsistent and applied unevenly. The document also notes that there are some sites with confusing or inadequate signage regarding dog regulations. These facts would seem to call into question any assumptions about the actual level of compliance with current regulations and require further, careful monitoring before a proper analysis of this point can be made.

There is another underlying assumption in the analysis of the "No Action"

alternative that creates a bias against this option. When assessing the impact of the "No Action" alternative on park operations, the DEIS projects that additional labor and expense will be required for a sustained period to handle dog management, even though this option represents no change from the current operations. The analysis of the other four alternatives regarding park operations assumes that only a temporary increase in labor and expense would be required to implement new dog regulations. The DEIS offers no explanation as to why the new regulations would not also require sustained enforcement and maintenance of signage to be effective. Because of this imbalance of assumptions, the "No Action" alternative is projected to place a higher burden on park operations than the other four alternatives.

When analyzing the "No Action" alternative, the DEIS makes no allowance for the effects of improvements to the existing regulations that would mitigate the assumed negative impacts of allowing dogs in limited areas of the GGNRA. These improvements could include more consistent enforcement of current regulations, replacing inadequate post and cable fences with more effective barriers around sensitive areas, a steep increase in the fines for violations of dog regulations, or stricter policies such as requiring dog training classes for repeat offenders much like drivers caught speeding are required to go to traffic school. The Crissy Field tidal marsh provides an excellent example of how a combination of consistent enforcement, clear signage, and effective wire fencing led to a thriving protected area coexisting with an extensive off-leash dog area.

The DEIS states that the GGNRA is prepared to spend 1.5 million dollars a year to implement their preferred alternatives at the 21 sites covered in this report. This figure is seven times what is now spent on enforcement of the current dog management policies. If the GGNRA would consider increasing spending to improve compliance with existing dog regulations, I am confident they could preserve the already limited access for dogs and achieve their goals of protecting the natural resources of the area.

I believe the various alternatives for each site discussed in the DEIS were not fairly and comparably analyzed, resulting in a consistent bias against the "No Action" alternative. I ask that the GGNRA reevaluate the assumptions underlying the conclusions about the impacts of the alternative plans and gather data to more accurately gauge the levels of compliance with current regulations.

Thank you for considering my comments,

Sarah Green

Received: May,30,2011 19:33:41

Correspondence Web Form

Type:

Correspondence: Dear Superintendent Dean,

I have lived in San Francisco for 14 years and frequently visit the GGNRA. Since getting a dog two years ago, I go to Crissy Field every week and to Fort Funston about once a month. I enjoy walking with my dog under voice-control in these areas and I always make sure to have my dog in sight and to pick up all pet waste.

I have read the Draft Plan/Draft Environmental Impact Statement (Plan/DEIS) for Dog Management in the GGNRA that was released in January, and I believe the compliance-based management strategy outlined in the document is inappropriate and a violation of the requirement of the GGNRA to seek public input regarding major changes in regulations.

The DEIS suggests that compliance with current dog regulations is poor, but the document doesn't place the number of documented incidences of noncompliance in context with the total number of visits by dogs. On any given weekend day at Crissy Field, I would estimate around 700 dogs visit the area. The DEIS lists around 250 leash law violations over a one-year period at Crissy Field, which in the context of tens of thousands of dog visits over that same period seems extremely low. However, the DEIS uses these incomplete statistics about noncompliance to justify the implementation of the compliance-based management strategy if compliance with new regulations falls below 75%.

I also believe there are several flaws in the compliance-based management strategy itself. The DEIS only vaguely outlines how baseline compliance would be established and how future monitoring of compliance would be done. Also, this compliance monitoring would be done by GGNRA staff, not an impartial group, leading to doubts about the accuracy of the data collected.

In addition to the flaws in the design of the compliance-based management strategy, the policy itself is overly restrictive. Currently the GGNRA is working with the public to develop a set of dog regulations that is acceptable to a large group of GGNRA users. Any changes to these rules through invocation of the compliance-based management strategy would be permanent. There is no mechanism to appeal the shift to the more restrictive alternative or revisit the policy when new management or enforcement techniques can be considered. This is not a responsive management strategy for public recreational lands, but a punitive approach that robs GGNRA users of their voices.

I feel the compliance-based management strategy outlined in the DEIS ignores the responsibility the GGRNA has to incorporate public comments when developing new policies and I believe it should be removed from the plan before finalization.

Thank you for considering my comments,

Sarah Green

Correspondence ID: 4070 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:37:40
Correspondence Type: Web Form
Correspondence: As an equestrian who has ridden at Fort Funston for the last ten years please see my comments on the Draft EIS below.

Equestrians who ride on the beach and on Fort Funston proper have coexisted with dog walkers, hang gliders and other visitors for decades. In the past ten years, however, the lack of guidance and enforcement and inconsistent policies have led to increased incidents between off leash dogs and horses. While the majority of dog owners (including those who ride horses with off-leash dogs) keep their dogs under voice control, incidents have increased and continue to threaten the health and safety of other visitors. Because of the danger, many visitors choose not to frequent Fort Funston allowing the perception that the entire area is only a "dog park" and creating the feeling that the park service is violating their multiple use mandate by catering to a single user group.

In the spirit of multiple use, I support Alternative E with the following two caveats: 1) Horse trail- I do not believe it is necessary to exclude dogs from the horse trail as long as they are on-leash. The trail has several blind corners and if an on-leash policy was enforced, horses, riders and dogwalkers would be safe. 2) ROLA- I am very concerned about concentrating dogs in an area without barriers. If the ROLA doesn't have a barrier to the south, there would be no way to prevent offleash dogs from concentrating on an onleash state beach and increasing incidents with other users.

General Comments pertaining to dog walking in GGNRA Lands and the document itself: 1)Why wasn't a global no dog alternative analyzed in the DEIS? It may not be preferred among most users, but it would satisfy the requirements under NEPA and show a good comparison of how excluding a certain use would socially affect visitors. 2)Commercial Dog Walking-On most public lands, any commercial entity making money off of use of those lands usually has to pay a permit or lease fee to the agency responsible for

those lands (BLM- OHV races, Livestock grazing, mining, etc.; US Bureau of Reclamation-houseboat rentals, jet ski rentals, marinas, campsites, etc.). It seems that an entity bringing multiple dogs to NPS lands and making money off of that without having to assist in the upkeep of that area (financially or otherwise) is unfair to the rest of the general public using those lands and strains agency resources. This should be a general requirement on commercial dog walking in all GGNRA lands for all Alternatives (including the No Action alternative). 3)2002 Telephone Survey- It seems this is outdated for such a large plan (9 years?)?a more recent survey should be done prior to completion of the FEIS. 4)Who are the cooperating agencies in this process? When were they involved? Did they sign an MOU identifying their role in the process? 5)ROLAs- Great idea, but a ROLA without actual barriers is useless. EXAMPLE-A ROLA on a beach?unless there is a physical barrier, the offleash dogs will run outside of the boundaries (even under voice control). ROLA boundaries should be signed and some type of barrier be erected to contain dogs. If you can't contain the dogs from running outside the boundary then it is NOT a good place for an offleash area. 6)DEIS/ FEIS distribution-Why wasn't a request sent out to the mailing list asking them which format they would like to receive the DEIS in? Printing thousands of hard copies of a thousand plus page EIS seems like a complete waste of park service budget and resources. This request is recommended for the FEIS. 7)EIS Volume 2- It would help if there was a TOC at the beginning of volume 2 in addition to a TOC at the beginning of Volume 1. 8)Moderate to major impacts- Why is there NO mitigation identified when moderate to major impacts are recognized? It seems like a proper analysis would at least identify some measures to reduce impacts. 9)Alternative Conclusion Tables-Why are some of the cells empty on these tables? Example: Page 870, First Row?Why are the "Impact Change Compared to Current Conditions" and "Cumulative Impacts" columns empty? If there are no changes or cumulative impacts, this should be stated.

Executive Summary 10)ROLA's- If you mention a ROLA in the ES, it should be defined. 11)Commercial Dog Walking (pg. xiii second to last paragraph)-" 6 dogs. Six dogs off leash is not reasonable. How was this number decided? If too much for summary reference where discussed in document?AND explain better there. 12)Compliance Based Management Strategy (pg. xiii last paragraph)-Need to address noncompliance in ROLAs (e.g. not picking up waste, more commercial dogs than permitted per handler, etc.). 13) Compliance-Based Management Strategy (pg. xiii last paragraph)-"To prevent these impacts from increasing or occurring outside of the designated dog walking areas the NPS would regularly monitor all sites" Need more information-How would monitoring take place and how often? If too much for summary need to reference where discussed in document.

Chapter 2 Alternatives 14)Alternative Elements Eliminated from Further

Analysis-Pg. 93, First whole paragraph, "This program was cost prohibitive and would have required substantial park staff time" Cost is not an acceptable reason for eliminating an alternative. If this type of management is too costly than the park service should not allow the activity in the first place.

Chapter 3 Affected Environment 15)Visitor Experience, Incidents between Visitors and Dogs, Pg. 280-First sentence should mention hang gliders. 16)Law Enforcement, page 283, Third paragraph- "Violations are handled using a reasonable enforcement response". Reasonable is a bad choice of wording. This is subjective and varies by incident. 17)Law Enforcement, page 283, fourth paragraph- This issue with this whole paragraph is that there is not consistent enforcement throughout the park. 18)Page 286 "It is also assumed that the large percentage of visitors that experience incidents with dogs do not report them to park staff (Coast, pers. Comm., 2006)" This is a FACT?it should not just be an assumption. I have ridden horses on the beach below Fort Funston for over 10 years. There has not been ONE ride where an offleash dog has not chased after my horse. That being said, they usually turn around or stop after a while, but these are all incidents that harass/ annoy/ or effect the visitor experience of another user of the public land. I do not call the park service every time this occurs because I have a VERY seasoned horse and am used to handling the situation, but it should be noted that the events do occur on a regular basis and they are non-stop under current management.

All of Fort Funston Affected Environment and Analysis Adjacent Parks-" ?the closest park is Lake Merced". THIS is an incorrect statement. The closest park to Fort Funston is Thornton Beach State Park whose boundary butts up against Fort Funston 's southern Beach boundary. Throughout the entire document, there is inadequate cumulative analysis about the effect activities at Fort Funston have on Thornton State Beach Park. For one, this state beach is on leash. A proper trends analysis would show that offleash visitors to Fort Funston historically have allowed their dogs to run offleash on Thorton State Beach. I am extremely concerned about the future of this area. If a ROLA was established on Fort Funston without barriers, this trend would continue and increase conflicts among users to the south.

Correspondence ID: 4071 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:37:43
Correspondence Type: Web Form
Correspondence: Sirs:

As the 2004 recipient of the Terwilliger Environmental Award, my views about the GGNRA proposals for managing pets reflect my strong

commitment to the earth and teaching about it. At the SFRPD's Randall Museum in San Francisco, I coordinated science education and dealt frequently with dog-related issues. Early in my time at the museum, I mounted the exhibit "Endangered in San Francisco" for visiting school children and families. Volunteers worked with me to initiate monthly habitat restoration and birding on Corona Heights as well as to coordinate the San Francisco Natural History Series. At the Museum, I developed and presented a wide variety of general and environmental science programs for children and trained instructors and docents.

Having retired from the SFRPD recently, my interest now is focused on Pacifica where I live. My concern for the survival of the endangered and threatened species locally corresponds with the National Park Service mission to protect them. The D alternative of the Dog Management Plan is usually my preference.

However, no area in San Mateo County is identified for off leash dogs. Designating such an area somewhere in this county, I believe, will serve as further protection for the habitats critical to protected and other wild species. Pacifica has a large and vocal community of dog owners, and the City of Pacifica recommendation to allow dogs on Tmigtac and Pollywog trails at Mori Point ignores the endangered species and the rest of us who work to preserve them and reflects only the dog owners' voice. (It is sad to see a city administration afraid of such a vocal group when the potential damage to the protected species is a real threat.)

In my third year as a Mission blue monitor, I continue to see off-leash dogs on Milagra Ridge weekly. Walking routinely and occasionally helping with habitat restoration at Mori Point as well as at Pacifica State Beach, I am forced to pay attention to avoid feces from unleashed dogs. Monitoring wintering Western snowy plovers, I spoke regularly to recalcitrant off-leash dog owners. Recently, while exploring Corral de Tierra, a group of us with CNPS met several off-leash dogs chasing balls into the area where endangered Hickman's Cinquefoil is surviving. The potential damage was unintentional but real.

Western snowy plovers, Bank swallows, San Francisco garter snakes, Red legged frogs, Mission blue butterflies and Hickman's cinquefoil all the other endangered or threatened species need the best protection possible. Wherever protected species exist, as at Crissy Field and Ocean Beach, NO on or off-leash dogs should be allowed anywhere near sensitive habitat.

In Marin, at Baker Beach and Ft. Mason I support the preferred alternative. At Crissy Field and Ocean Beach I support Alternative D. Absolutely no ROLA should be allowed anywhere near threatened or endangered species habitat, including Ft. Funston. Given the abuses I see regularly, I firmly

believe that any off-leash area must be fenced and leash compliance must be enforced at 95% with a goal of 100%. Non-compliance must have consequences that will cause all dog walkers to police themselves or lose the privilege of using an area or trail, ie. dog walking must be banned completely if the owners do not comply with rules.

Many people quietly give up walking in areas that have high dog use to avoid being nudged aside or jumped on and because they do not enjoy the odor of urine and feces. Their preference for trails without dogs should also be given more consideration.

In this densely urban area, the GGNRA effort to accommodate many varying park needs and users has presented an herculean task. I want to express my appreciation and enormous gratitude to the dedicated and talented staffs of NPS, NPCA, GGNRA and GGNPC.

Margaret Goodale

Correspondence ID: 4072 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:39:06
Correspondence Type: Web Form
Correspondence: Frank Dean General Superintendent Golden Gate National Recreation Area, Building 201 Fort Mason San Francisco, CA 94123-0022

Re: Golden Gate National Recreation Area Draft Environmental Impact Statement

Dear Mr. Dean:

The GGNRA was created in 1972 to "preserve for public use and enjoyment certain areas of Marin and San Francisco [and] to provide for the maintenance of needed recreational open space" Pub. L. No. 92-589. Adoption of the Preferred Alternative suggested by the GGNRA's Draft Environmental Impact Statement would run counter to these important and long-recognized goals.

For nearly forty years, the people of the Bay Area have enjoyed the GGNRA with their families and friends, both two-legged and four. My colleagues and I make regular use of the GGNRA. In areas where dogs are permitted off leash, both the dog owners and the non-dog owners among us value the ability of dogs to run leash-free. Dogs are an essential part of the landscape at Crissy Field, Fort Funston, Muir Beach, and other areas, and the draw of these places lies largely in the opportunity to interact with and watch dogs enjoying the open space. I know from personal experience with

my golden retriever at Crissy Field and Fort Funston that many people enjoy and appreciate the joy of a dog splashing through the ocean in pursuit of a ball or stick.

Open access to the GGNRA is an essential component of life in the Bay Area. Adopting severe restrictions limiting access based on the will of a few individuals is directly contrary to the goals of the GGNRA, which was created for all people to enjoy. In the open spirit with which the GGNRA was created and to avoid the costly, time consuming dispute that will undoubtedly ensue should the GGRNA adopt the Preferred Alternative, the GGRNA should reject the Preferred Alternative and uphold its commitment to ensuring open recreational access to land designated as such by Congress.

Sincerely,

Danielle Crockett

Correspondence ID: 4073 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:43:27
Correspondence Type: Web Form
Correspondence: I am supportive of option 12E for Baker Beach, it is a good balance of access for dogs and non dig users

Correspondence ID: 4074 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:46:13
Correspondence Type: Web Form
Correspondence: I am supportive of option 16A for Ft Funston; i the absence of any statistical usage analysis I would assert that this area is primarily used by dog walkers and thus should be left unchanged in usage.

Correspondence ID: 4075 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA's draft dog management plan. I believe the plan will have a negative impact on the residents of the City of San Francisco, as it proposes extremely restrictive policies about where we will be able to enjoy off-leash hiking, running and other recreation with our pets.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily ignores the needs of Bay Area residents who

exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

In my opinion, the GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area--and it IS an URBAN recreation area--not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. Further, by my observation and in my experience, there are quite a number of restrictions on off-leash use of GGNRA land already in place, but enforcement seems to be the real issue. I fear that if these more restrictive regulations are enacted, it will only be the law-abiding dog owners who will suffer; the scowflaws won't care about the new restrictions--just as they don't follow existing laws now. I have also observed that when people and their families walk with their pets, they are more open to meeting other people, usually via inquiries about their pets. In the years we've had our dog, we've met more people and engaged in pleasant conversations with strangers than I have ever experienced in all my years before owning a dog. I truly believe pets can bring out the best of humanity in us all.

The GGNRA draft management plan does not provide tangible evidence that justifies such drastic changes to 40 years of healthy dog and human recreation. The Park Service should honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Recognize that there are hundreds of uninhabited miles along the California coastline for wildlife to thrive, while we San Franciscans and our pets have a 7 x 7 mile peninsula on which to recreate. Please do not adopt the proposed regulations, but rather, honor the 1979 Pet Policy.

Thank you for your time and consideration.

Sincerely,

Virginia Otis

Correspondence ID: 4076 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:49:14
Correspondence Type: Web Form
Correspondence: San Francisco, CA 94114 May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area

Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am a 67 year old woman, privileged to live with a wonderful 11 year old rescue dog. We have been going to Fort Funston several times a week for more than a decade. I've felt so lucky to have such a beautiful place available to us, where I've made many good friends, both canine and human. I believe that my good health and that of my dog are a direct result of our being able to exercise freely there.

My dog is mellow, well-trained and well-behaved ? he brings smiles to the faces of the children and families we meet. We are respectful of the land and vegetation and give thanks for every minute we're able to spend at "The Fort."

I've been concerned about the environment all my life and am a regular contributor to The Nature Conservancy, Marine Mammal Center, California League of Conservation Voters and The World Wildlife Fund, among others. I am committed to preserving and protecting our natural areas.

I strongly disagree with the GGNRA's current preferred alternative. It is restrictive and arbitrary, as there is no sound evidence that off-leash dog walking is detrimental to GGNRA lands. In addition, I don't understand how you can in good conscience renege on the 1979 Pet Policy, which was a fundamental part of the agreement by which you acquired this land. Such action is unfair and perverse.

Please consider reasonable alternatives. It would be tragic for me and so many others if we were to lose areas where both people and dogs can socialize in a calm, friendly setting. Being at Fort Funston lifts my spirits and literally makes my day. My dog is ecstatic just being there. I know this is true for hundreds of other people and their pets.

I'm counting with all my heart on your sense of what's right - finding some other way to balance recreational use with with preservation and I support a modified Alternative A (the "No Action Alternative"). We have kept up our end of the bargain and I think you owe us a better deal than the one currently proposed.

Thank you for your consideration.

Sincerely, Nancy Prowitt

Received: May,30,2011 19:50:45
Correspondence Web Form
Type:
Correspondence: Dear Mr. Dean and GGNRA,

I am writing to you to let you know that I oppose your plan to limit dogs in the GGNRA.

I am particularly concerned with the plans to limit dogs at Fort Funston. As a native of San Francisco I have been going to Fort Funston for over 40 years, and my appreciation of it has grown immensely since I started taking my first dog there eleven years ago.

I see enormous value to the community to have an area where people can enjoy the outdoors and have their four legged family members enjoy a little freedom. I visit Fort Funston every weekend, my wife joins us on Sunday, regardless of the weather; fog, wind, rain or shine. I look forward to this activity, partly because of the walk (takes my dog Sparky and myself 50 minutes to do a loop), the beauty and also the friendliness of the other dog owners and the sheer joy you see in dogs and people of all ages.

I do feel that things can be done to help preserve the area, but the plan put forward goes way to far. I would suggest:

- All trails should be off leash (voice command) this includes: beach, Chip trail, Horse Trail, Sunset Trail, Battery Davis Trail, Coast Trail, trails to the beach and the trail from the ranger station to the main parking lot
- I think most of the damage done by dogs are from their owners throwing balls in areas that dogs should stay out of.
- There should be a few designated area where dogs can chase balls (in front of the main marking lot, drinking fountain area by stairs, beach and on marked trails.
- GGNRA should repair the fences in the habitat protected areas and post signs with the fine amount.
- Rangers should patrol the area to enforce the new rules

I would like to see a reasonable plan put forward by the GGNRA, but the plans you have proposed would significantly reduce my enjoyment of the area and I think it would also reduce the benefit that the community gets from having an off leash area of this size available.

Have you ever been to Fort Funston on a weekend and seen this enjoyment?

Robert Valle San Bruno, CA 94066

Thanks

Correspondence ID: 4078 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. I believe the plan will have a negative impact on the residents of the City of San Francisco, as it proposes extremely restrictive policies about where we will be able to enjoy off-leash hiking, running and other recreation with our pets.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily ignores the needs of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

In my opinion, the GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area--and it IS an URBAN recreation area--not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. Further, by my observation and in my experience, there are quite a number of restrictions on off-leash use of GGNRA land already in place, but enforcement seems to be the real issue. I fear that if these more restrictive regulations are enacted, it will only be the law-abiding dog owners who will suffer; the scoflaws won't care about the new restrictions--just as they don't follow existing laws now. I have also observed that when people and their families walk with their pets, they are more open to meeting other people, usually via inquiries about their pets. In the years we've had our dog, we've met more people and engaged in pleasant conversations with strangers than I have ever experienced in all my years before owning a dog. I truly believe pets can bring out the best of humanity in us all.

The GGNRA draft management plan does not provide tangible evidence that justifies such drastic changes to 40 years of healthy dog and human recreation. The Park Service should honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Recognize that there are hundreds of uninhabited miles along the California coastline for wildlife to thrive, while we San Franciscans and our pets have a 7 x 7 mile peninsula

on which to recreate. Please do not adopt the proposed regulations, but rather, honor the 1979 Pet Policy.

Correspondence ID: 4079 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I have lived here for 34 years and use many of the GGNRA beaches for family, personal, recreational and dog walking reasons. I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979" Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

If you want to worry about beach soil, birds, and noise, there are many more egregious users: horses, picnickers, uncontrolled children, joggers, large events (permits authorized without comment by the GGNRA administration)!

Correspondence ID: 4080 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:52:32
Correspondence Type: Web Form
Correspondence: Regarding the Draft Dog Management Plan/DEIS, we advocate for Alternative A (no action): The current dog practices should continue as is and without any changes. We absolutely support that our beaches, and especially Ocean Beach, Fort Funston, and Crissy Field, are natural resources worthy of preservation to be safely enjoyed by all visitors, now and future generations. It also makes sense that the GGNRA have a plan that is unique from the other National Parks when it comes to the dog policy since we live in a densely populated area and the beaches are in essence our backyards. We have lived in San Francisco for over 20 years and have used the GGNRA extensively, and half of that time as a non-dog owners, with pure enjoyment of the natural resources. We have witnessed much wildlife and appreciate the uniqueness of such in our urban environment.

Humans, birds, and dogs should have the equal opportunity to coexist without the new restrictions proposed by the GGNRA. Three years ago we adopted a small dog, who is now fifteen pounds, and the preciousness of the open space provided by the GGNRA became absolutely invaluable. Two years ago we moved to 45th Ave. at Lawton St. and adopted a second 15 pound dog, and we can say that we are at Ocean Beach nearly every day since. Our considerable experiences at Ocean Beach have proven contrary to the DEIS and that the current situation is safe for all (humans, dogs, snowy

plovers, etc.) and that the recreational areas provide an invaluable resource for us and our lifestyle. During all of our time visiting Ocean Beach these past couple of years, we have only had safe and positive experiences with park rangers, most of whom engage us in small talk about our dogs, whether on or off leash. Our dogs pose no danger to the wildlife or public, in fact most day's people and children want to pet or play with our dogs. And with our frequent visits to the beach, our dogs have learned "no birds" means no disturbing the wildlife. Additionally faces have become familiar and we've met many wonderful people. The daily dog walks along the ocean not only provide a great opportunity to exercise and experience nature's wonders, but it has also enabled us to meet distant neighbors and build community: Shouldn't that be the goal of the National Park Service and the GGNRA?

Living four blocks from Ocean Beach, we use the beach often either with our two small dogs or alone as a place to exercise. We witness firsthand the birding activity and the impact humans with or without dogs have on the birds: Birds, especially the protected snowy plovers, are not at the beach 24/7, and people exercising along the shore or roaming in the grassy dunes disturb the birds more frequently than dogs simply because their numbers and usage outweighs that of dogs. Although there may be random episodes where a dog is off-leash and chasing the birds, it is infrequent. We are there year-round, not just on the weekends, not just when the weather is actually warm or even hot, but we are there when it is windy, cold and foggy, or just pleasant. We use the GGNRA beaches nearly every day, and there is no justifiable reason to make any further dog restrictions. If restrictions are to be made, it should be because of human activity rather than inaccurately placing blame on dogs for wildlife or habitat decline. There will always be people who don't like dogs, but enforcing restrictions won't change that vocal but minority user group. In our experience of using the beach multiple times a day and nearly every day for the past 2 years, there is no reason to make any changes other than provide better signage to clarify where and how far away the off-leash areas are located or to educate the community about why certain sections are designated leashed only and how their positive actions will preserve our wonderful recreational areas.

Since the public announcement about the proposed dog policy changes, there have only been a few occurrences where we have seen other dogs chasing wildlife or disturbing the habitat. And in most of those situations we have been able to go to the dog owner and talk with them about how important it is to respect the current dog policy so that dogs are always allowed on the beaches. When explained why dogs chasing birds is bad, as was told to us by another beach user who claimed to be a naturalist, each dog owner took action: Upon learning how disturbing the feeding birds may result in future starvation we have seen firsthand dog owners taking immediate action to restrain their dogs and most have thanked us for the clarification. Instead of making changes to the current dog policies, better

signage and explanation should be made readily available so dog owners know why there are usage limitations, and where and how closely located are the off-leash areas. Although we have read comments about negative incidents involving dogs and people, in all of our time at the beach we have not actually witnessed any so we believe it to be in reality a minority issue; therefore, the GGNRA should not propose additional restrictions across the board to all dog owners and all dogs but should instead individually address any problems. We believe that the reality is most San Francisco dog owners are environmentalists who care about preserving the beaches and its wildlife while maintaining maximum enjoyment of our special urban oasis. We are truly lucky to have the GGNRA in our backyard, and we believe most of the populace recognizes this, which is why our recreational areas should continue to be available for all to enjoy.

Sincerely,

Lisa Dougherty Jason Stallcup

Correspondence ID: 4081 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:56:34
Correspondence Type: Web Form
Correspondence: To Members of the Negotiated Rulemaking Committee for Dog Management,

I have lived in the Outer Richmond for 4 years now and am a regular visitor to Lands End. I am writing because I have been in (and witnessed) numerous dangerous situations with dogs and their owners while walking the Coastal trail and I fear it is only a matter of time before someone is seriously injured. This trail is heavily used by joggers, tourists and hikers of all ages. In several parts, the trail is narrow, uneven, steep and bordered by cliffs. There are blind corners, tight turns and several stair cases. When dogs both leashed and unleashed are being led through these sections, it creates serious congestion and apprehension for the parties involved, as well as the potential for serious injury. Alternative D is the best proposal, because it does not allow dogs in the above-mentioned areas.

Thank you for your time, Maggie Dale - San Francisco resident and weekly hiker on the Lands' End Coastal Trail

Correspondence ID: 4082 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:56:54
Correspondence Type: Web Form

Correspondence: Hello~

I am writing, first, specifically towards Muir Beach. This is mine & my pup's favorite place to walk, run & swim. In all our visits to this beautiful place, we have never seen a negative encounter of dogs & people, dogs & wildlife, or even dogs in the dunes. Without Muir Beach, we would be drastically limited in our options for outdoor exercise & play, which is why GGNRA was first instated. Without scientific studies proving the claims that dogs are causing damage to the various areas that would be affected with these changes, I feel it is more of a personal attack on dog owners... While I do understand that there are sure to be some irresponsible dog owners here & there, though I have yet to encounter any at Muir Beach, I hope the final decision is in favor of promoting the good health & exercise of dogs & their owners. Personally, I always keep my dog on leash until we've reached a good location to settle and play at. We never leave anything behind, and often take what other's have left behind with us. There already seems to be many beautiful places I wish I could run with my dog that I cannot (ie. Tennessee Valley) Please, please, do not take away Muir Beach. It is one of the main reasons I moved to Mill Valley 5 years ago. If I cannot take my dog, I would not be visiting it nearly as often.

As for the other locations included in this proposed plan, I know there are many responsible pet owners that would be negatively affected. Especially in the city where there are so few open spaces to run. I would hope that the accusations made about dogs affecting the wildlife were founded on scientific research, but they are not. The same argument could be made for irresponsible parents letting their children run on the dunes, and into protected wildlife habitats. (Ironically, I have seen more children causing damage than dogs...)

I thank you for taking comments and for your time. I hope that we are able to continue enjoying the beautiful spaces that have been protected for our well being.

Sincerely~

Mary Peterson

Correspondence ID: 4083 **Project:** 11759 **Document:** 38106

Received: May,30,2011 19:58:32

Correspondence Type: Web Form

Type:

Correspondence: Even though I live in a beautiful, progressive, liberal, accepting city, my life was empty before I adopted my Spike. Welcoming Spike into my life (and saving his life) was a life changing event. I adopted him knowing that we

would be welcomed at numerous green spaces in the city. And, we built a great life together.....exploring all the dog-friendly parks in the city. Walking and getting outside with my companion helped me overcome my depression - both by exercise and being outdoors. My life was changed because I was able to "get outside" with my dog and be in this great city. Because of the dog-friendly parks, I frequented neighborhoods and business I would not have, had I not had a dog. Having a dog, and being able to visit certain parks with him, I helped small businesses. Should parks become on-leash or closed to dogs, I will not visit these small businesses and spend my money. Additionally, I feel us "good" dog-owners are being jeopardized for the irresponsible dog owners. On many occasions, I have confront dog owners to; pick up after their dogs, not allow them into off-limit areas, leash their dogs in leashed areas, etc. Why are these laws not being enforced by the responsible authorities? I know funds are limited, but on many occasions I have witnessed park officials and other authorities ignore an irresponsible dog owner. Unfortunately, the irresponsible owners are the ones that make an impression. The responsible owners (those who live within the laws) are not recognized. Why not enforce the laws before taking away our space? Change cannot happen without education. The laws that are proposed are not educating us, the laws are dictating a change. The irresponsible dog owners will still break the law and ignore the rules. The responsible dog owners will respect the rules, continue to voice concerns to those breaking the rules..... Why is the city going from a to z? Why are we not taking the step to enforce the rules and fine/prosecute the offenders? We do this with other laws: drunk driving, littering, etc. Let's start to ticket the law breakers, and we will see change.....

If doggie green space and off leash areas are taken away from city residents, I suspect many people will move out of the city.

Correspondence ID: 4084 **Project:** 11759 **Document:** 38106
Received: May,30,2011 19:59:57
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean,

I have lived in San Francisco for 14 years and have visited many sites within the GGNRA both with and without my dog. I enjoy hiking in the Marin Headlands and understand the importance of limiting the presence of dogs in many areas of that section of the recreation area. I also enjoy taking my dog to Crissy Field or Fort Funston every week and have enjoyed the opportunity to allow my dog to have off-leash exercise and access to the beach and swimming. I am always a responsible dog-owner, have my dog under strict voice-control, and I consistently pick up pet waste.

I have read the Draft Plan/Draft Environmental Impact Statement (Plan/DEIS) for Dog Management in the GGNRA that was released in January, and I believe the plan fails to adequately balance the GGRNA's responsibility to preserve urban recreational opportunities that was outlined in the enabling legislation that created the GGNRA in 1972. The fact that the every preferred alternative for all 21 of the sites covered under this plan represents a more restrictive dog management policy than is currently in place strongly suggests that the interests of dog-walking visitors are not being given equal consideration as other factors.

In the user impact analysis section of the DEIS, the document mainly focuses on non-dog walking users and emphasizes possible scenarios where the presence of dogs "could" negatively impact their experience. There is almost no mention of the significant and very real negative impacts the new dog regulations will have users with dogs despite the fact that they represent a major category of regular GGNRA visitors at several sites like Crissy Field, Fort Funston, and Muir Beach. There is also no mention of the satisfaction many non-dog-walking GGNRA visitors get from watching dogs freely at play. For twelve years before I got a dog of my own, I frequently visited Fort Funston and Crissy Field specifically to enjoy the sight of dogs having fun.

The two surveys cited in the DEIS present directly conflicting data for both the question of whether there is general support for off-leash dogs in limited areas of the GGNRA and the question of whether minorities are dissuaded from visiting the GGNRA because of the presence of dogs. These are two major reasons the DEIS cites for the need to further restrict dog access to the GGRNA, even though there is no solid evidence to support these conclusions.

The DEIS also cites the high incidence of violations of current dog regulations as a justification for further restricting dog access in the GGRNA. However, the plan does not discuss how the numbers of violations relate to the total number of dog visits to the GGNRA. The vast majority of these dog citations were for violations of leash laws, not harmful human-dog interactions that could result in injury, even though the DEIS states that the danger dogs could pose to visitors is a main concern. Overall there were 54 negative dog-human interactions cited in the GGNRA in a two-year period during which tens of thousands of dogs also visited the recreation area.

The DEIS also repeatedly states that "dog walking regulations are unclear to visitors" but doesn't consider enhanced signage and education as an option for improving compliance with current dog regulations. A clearer understanding of which areas are dog accessible would significantly reduce conflicts between different groups of GGNRA users without reducing access for any one group. Visitors who prefer a non-dog recreational experience

would be able to avoid areas that allow dogs and to enjoy the more that 95% of the GGNRA that does not. Under the preferred alternative plan, the GGNRA is willing to increase the amount spent on enforcement and visitor education by seven-fold, but they do not seem willing to make a similar commitment to enforcing existing regulations that would preserve access to the GGNRA for all types of visitors.

I also believe that the GGNRA could preserve the current level of dog access within and protect delicate sections of the recreation area if the GGNRA repaired what has become an adversarial relationship with the many groups representing dog-walking visitors to the GGNRA. A working partnership between the GGNRA and these groups is crucial to improving conditions at all dog-accessible sites within the GGNRA. Dog organizations can assist with visitor education programs, organize pet waste pick-up events, represent a reliable source of volunteers for improvements to fencing and replanting native vegetation in affected areas of the GGNRA, and provide a strong unofficial force to change the culture of compliance at problematic locations in the GGNRA.

Many of the problems the DEIS cites in relation to dog access seem to be related to commercial dog walkers and people responsible for large numbers of dogs. It is understandable that it is more likely that someone with many dogs would be less able to adequately control them, pick up pet waste, and keep them out of restricted areas. This is reason for the GGNRA to begin regulating commercial dog walking and perhaps limiting the number of dogs one person can bring, but it is not a reason to deny access to historically dog-friendly areas of the GGNRA for individual, responsible dog owners.

I believe that off-leash walking access for dogs is an essential part of the mission to preserve recreational open space for the urban environment that was the founding principle of the GGRNA. A small, designated off-leash play area for dogs or on-leash only paths cannot adequately replace the experience of hiking with an off-leash dog. Access to off-leash dog recreation areas also allows those with limited physical capabilities like the elderly or disabled to provide their pets with sufficient exercise. The veterinary community recognizes that off-leash, open-space interactions between dogs reduces overall aggression and is an important aspect of dog socialization. It is important that as the GGNRA expands in the future, it continues to provide opportunities for these types of recreation and community interactions. Consequently, the plan should include some access for dogs in the new lands in San Mateo County, particularly since many of these areas allowed dogs before being acquired by the GGRNA.

When Bay Area cities and counties turned over much of their open spaces in 1972 to create the GGNRA, they did so with the understanding that all residents of their urban areas would continue to have a place to enjoy open-

space and experience nature under a variety of circumstances. The GGNRA was never meant to be exclusively a nature preserve or to be restored to a pristine wilderness. It is vital that it continue to balance the recreational needs of the community, including dog-owners, with its commitment to the environment. I ask that based on this founding principle of broad, recreational access the GGNRA reconsider the restrictions on dogs that are part of this DEIS.

Thank you for considering my comments,

Sarah Green

Correspondence ID: 4085 **Project:** 11759 **Document:** 38106

Received: May,30,2011 20:00:20

Correspondence Type: Web Form

Correspondence: I am writing to express my disagreement with your proposed dog management plan. Muir Beach is my & my dog's favorite place to walk, run & swim. In all our visits to this beautiful place, we have never seen a negative encounter of dogs & people, dogs & wildlife, or even dogs in the dunes. Without Muir Beach, we would be drastically limited in our options for outdoor exercise & play, which is why GGNRA was first instated. Without scientific studies proving the claims that dogs are causing damage to the various areas that would be affected with these changes, I feel it is more of a personal attack on dog owners... While I do understand that there are sure to be some irresponsible dog owners here & there, though I have yet to encounter any at Muir Beach, I hope the final decision is in favor of promoting the good health & exercise of dogs & their owners. Personally, I always keep my dog on leash until we've reached a good location to settle and play at. We never leave anything behind, and often take what other's have left behind with us. There already seems to be many beautiful places I wish I could run with my dog that I cannot (ie. Tennessee Valley) Please, please, do not take away Muir Beach. It is one of the main reasons I moved to Mill Valley 5 years ago. If I cannot take my dog, I would not be visiting it nearly as often.

As for the other locations included in this proposed plan, I know there are many responsible pet owners that would be negatively affected. Especially in the city where there are so few open spaces to run. I would hope that the accusations made about dogs affecting the wildlife were founded on scientific research, but they are not. The same argument could be made for irresponsible parents letting their children run on the dunes, and into protected wildlife habitats.

I thank you for taking comments and for your time. I hope that we are able

to continue enjoying the beautiful spaces that have been protected for our well being.

Sincerely~

Kevin Hartman

Correspondence ID: 4086 **Project:** 11759 **Document:** 38106
Received: May,30,2011 20:01:46
Correspondence Type: Web Form
Correspondence: I do not agree with the proposed dog management plan. Please keep Muir Beach a dog-friendly place!!!

Correspondence ID: 4087 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: My name is Jessica B. Crawley, Esq. I have lived in San Francisco since 1984 when I moved here with my family when I was 1 year old. I have visited GGNRA lands with my dogs since I got my first dog in 1992. I have participated in beach clean-ups since I was 7 years old. I currently visit GGNRA lands on a daily basis including Crissy Field, Ocean Beach, the Presidio, Baker Beach and Fort Funston. I walk or jog with my dogs in the GGNRA every single day, rain or shine. Walking my dogs off-leash and under voice control in the GGNRA keeps me healthy and physically fit, provides me with time to reflect, de-stress and enjoy nature. My dogs are extremely well trained, they compete in rally obedience, have several titles and awards, and are Canine Good Citizens (passed the AKC Canine Good Citizen test). Sufficient exercise through off-leash recreation in the GGNRA is a significant reason my dogs are happy, extremely healthy, fit and well-mannered. I always carry bags with me to clean up my dogs' waste. I am a member of Ocean Beach Dog Group, Association of Pet Dog Trainers and Cavalier King Charles Spaniel Club-USA.

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of

people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

-Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

-Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

-Exclude speculative, exaggerated, biased, or misleading statements and studies.

-Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

-Enable professional dog walking of 6 or less dogs and align any professional dog walking rules with county or city regulations.

-Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: In the almost 20 years I have visited the GGNRA I have never seen a dog act aggressively toward a person, nor have I seen any dogs bothering bank swallows' burrows on sheer cliff face at Fort Funston. I observe a significant increase in litter when people without dogs visit the GGNRA on the weekends where the weather is especially nice. This litter is typically picked up by dog owners/walkers or groups at organized clean-ups.

Correspondence ID: 4088 **Project:** 11759 **Document:** 38106
Received: May,30,2011 20:03:57
Correspondence Type: Web Form
Correspondence: VIA E-mail

May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area

Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I have been a Bay Area Resident and have lived and worked in San Francisco and Marin counties since 1978. I have explored beaches and trails throughout these areas for many years with my current dogs Grace and Space and my former dogs. My girls and I are eager partners for our daily outings that connect us to the recreational pleasures of places like Crissy Field, Baker Beach, Lands End, Ft. Miley Upper Fort Mason, Marin Headlands, and Muir Beach. These daily outings keep us connected and balanced for the demands of a busy life.

My dogs and I have attended training sessions to learn basic obedience skills and recall. Both are well socialized to both people and dogs and are exceptional companions at home, around town and on the trail. I expect my dogs to be well behaved and responsive to voice commands on leash and off. I leash my dogs to keep them from sensitive areas and clean up after my dogs. As a dedicated hiker/walker/bicyclist, I also educate fellow dog and non-dog enthusiasts about canine/human//bike interactions. On walks, I educate friends about the native plant/animal communities.

I have worked professionally as an environmental scientist/senior environmental project manager for over twenty years in both the public and private sectors. During this time, I worked for the US EPA, National Park Service (on loan to the GGNRA for work on the Presidio Project) and the San Francisco Redevelopment Agency. I understand the complexities of developing a fair and balanced dog management plan within the GGNRA. In addition, I have been a long-term member and supporter of NRDC and The Nature Conservancy.

For the past ten or more years, I have been the chair (and co-founder) of the Crissy Field Dog Group and have worked extremely hard to work with the GGNRA (and with the late GGNRA Superintendent Brian O' Neill) and other environmental and recreational groups to figure out a reasonable and viable alternative/solution for this complex dog management issue.

So it was to my great disappointment and surprise when the GGNRA released your draft Plan/EIS. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (GGNRA's 1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions and do not provide a basis to change dog walking

areas under voice control as identified in the 1979 Pet Policy. It is essential for the GGNRA to consider reasonable and balanced alternatives for off leash dog walking on existing lands.

While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting off leash dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The additions I would add to what you call Alternative A (No Action) would be a Hybrid or Modified Alternative A which would include the inclusion of the "New Lands", in San Mateo and Marin Counties and the application of the following management measures that would support a reasonable, realistic and enforceable dog management plan.

The Hybrid Alternative, includes the 1979 Pet Policy (Alternative A: No Action-existing conditions), include the New Lands, and the implementation of management measures, which include but are not limited to more, better and clearer signage, a robust educational program that would include partnering with local animal welfare groups such as the San Francisco SPCA, Marin Humane Society and the Peninsula Humane/SPCA at a minimum. Other measures include the use of environmental or vegetative barriers, and low-level post and cable fencing to protect a plant species such as the blue lupine. I also support the creation of a "recreation team or panel" who can assist the GGNRA with issues regarding all recreational visitors in a public forum on a quarterly basis.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a scientific baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure as the goal. As a matter of fact, Eco-dog (with a letter from the San Francisco SPCA) has submitted a draft Compliance Based Adaptive Management Program that proposes a viable alternative to this approach that proposes a constructive and transparent compliance program to be administered with public input with clear and defined parameters.

The DEIS also fails to consider that the GGNRA is the front/back yard for a large metropolitan area. I live in Marin County and have strong ties to the lands of the GGNRA, as do many of my friends and fellow dog enthusiasts that live in San Francisco/North/East/South Bay Counties and beyond. The

fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area.. NEPA requires evaluation of impacts on the "human environment": the DEIS fails to do so by failing to adequately address how the proposal will affect "recreational" values as well as natural, scenic and cultural values on residents of the Bay Area..

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as adversarial values i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment. I believe I am a good steward of the environment and I believe that many of my fellow dog lovers are also good stewards. This bias extends to the overall document, pitting recreation vs. natural values rather than identifying and exploring reasonable alternatives where nature/recreation can work together. And as a matter of fact, if you do a word search in Chapter 4 of the DEIS, you will find that the word "may" is used approximately 3300 times and the word "potential" is used approximately 1100 times.

Further, the proposed broad limitations in the DEIS are largely without site-specific science that demonstrates that the perceived degradation of the quality of the GGNRA's natural resources are actually attributable to dogs vs. other factors. For example, much of the impact on native dune habitat that I have seen at south Ft Funston is due to non-native/invasive species, erosion, and equines and transients/homeless encampments vs. foot/dog traffic.

There are many other concerns that I have but I want to be clear that the Golden Gate National Parks Conservancy's "Crissy Field Center" as identified on page 361, is a TEMPORARY relocation due to the deconstruction and construction of the Doyle Drive seismic retrofit work. Please correct this misinformation. Cal Trans is using the Crissy Field Center as their headquarters during this work in a deal that Cal Trans would re-build the interior of the old Crissy Field Center and provide "State of the Art" technology after the Doyle Drive construction is finished. Doug Overton of the GGNPC "promised" that the move to the eastern portion of Crissy Field would be temporary until the Doyle Drive project is completed. In addition, because the Crissy Field Center has temporarily relocated, it has caused an increase in traffic and parking availability (a BIG negative) for all visitors at Crissy Field.

And for the other sites that may fall through the cracks, I am very concerned that there is no technical or scientific basis for change at all of the Marin sites, Baker Beach (beach nudity is the biggest concern-not off leash dog walking), Lands End/Fort Miley and of course Upper Fort Mason. Folks

have been walking their dogs off leash for years at Upper Fort Mason and even the late GGNRA Superintendent Brian O' Neill did not mind but actually enjoyed the dogs there. This area is primarily frequented by folks who live in the neighborhood who come with their dogs? a LOT of older people and working people who are very responsible and clean up after their dogs and there are VERY few dog conflicts. There is a very tight knit dog community at Upper Fort Mason as well as in the other areas under consideration in your GGNRA dog management plan.

For Fort Funston, I offer the following as a compromise:

Leash-only from the upper parking lot to the south edge of Fort Funston, inclusive of the parking lot, hang gliders' take-off area, and observation deck. Leash-only along the Sunset Trail (including the area west to the ocean and 20' along the eastern side), starting at the upper parking lot, going all the way to the center beach access (following the trail closest to the ocean).

Move the center water fountain further east (to the top of the John Muir trail sand ladder).

Here are the problems that get solved with this solution:

Eliminate the danger to hang-gliders of dogs chasing them at take-off and landing. Eliminate the danger to equestrians when they are riding along the south cliff area to get to the beach. Provide visitors who do not want to encounter off-leash dogs with a hike along the most beautiful trail at Fort Funston (overlooking the ocean).

And I think that all of the sites in San Mateo County have not been adequately analyzed, as there is no legal basis for what you call "New Lands". These "New Lands" in San Mateo County (and Marin County too) should be treated as "existing lands". There is no case law or anything in the GGNRA's compendiums or the current GGNRA General Management Plan to support your conclusions about treating these lands differently.

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

GMP.

Again, after careful consideration, I support Alternative A, the No Action alternative and would also include the "New Lands" areas in San Mateo County and Marin County. The DEIS is biased against the No Action alternative and failed to take a good look at this as a reasonable alternative. There are many areas in the GGNRA where the 1979 Pet Policy has been working and where sensitive species are not present and conflicts occur infrequently or not at all. The ways of improving how GGNRA carries out/administers the current 1979 Pet Policy should be considered and given a fair assessment. I believe that the current management plan will work for the many years if "tweaked" to provide clearer rules, improved compliance and reduced potential for conflicts. The majority of the "problems" with the current plan are problems include unclear or non-existence signage, inadequate management and implementation and a lot of specific education versus. access. If there are problems with access, then the DEIS doesn't provide a scientific or technical basis for the severe limitations proposed on continued off leash under voice control dog walking.

Thank you for your consideration.

Respectfully,

Martha Walters San Rafael, CA 94901

Cc: Senator Dianne Feinstein Senator Barbara Boxer The Honorable Nancy Pelosi Rep. Jackie Speier Rep. Lynn Woolsey Rep. Anna Eshoo Secretary Ken Salazar Mr. Jon Jarvis, Director San Francisco SPCA Marin Humane Society Peninsula Humane Society Crissy Field Dog Group Fort Funston Dog Walkers

Correspondence ID: 4089 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: San Francisco, CA 94147-5372 Please Visit Our Website:
www.crissyfielddog.org

May 27, 2011

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

Dear Mr. Dean,

Thank you for the opportunity to comment on this important document, the Golden Gate National Recreation Area's (GGNRA) Draft Environmental Impact Statement/Draft Dog Management Plan (Draft Plan/DEIS).

Introduction The Crissy Field Dog Group is a non-profit organization devoted to responsible off leash dog recreation in the San Francisco Bay area for over a decade. We have approximately 600 members distributed throughout California and many other states. We have worked with the GGNRA staff on off leash dog recreation issues throughout this entire period including as a member of the GGNRA Negotiated Rulemaking Committee for dog management. Our work has included working with the Golden Gate Audubon Society and the GGNRA staff on educational outreach for the protection of the Snowy Plover in the Wildlife Protection Area. We have also worked closely with other recreational groups including, the horse community, the windsurfing and the surfing communities as well as other dog groups to promote and facilitate co-existence among all park users and to protect natural resources. We have created sixteen educational videos promoting responsible dog recreation in the GGNRA as well as how to submit substantive comments. We work closely with the San Francisco SPCA and the Marin Humane Society and we are a member of the Eco-dog coalition promoting responsible dog ownership.

The Crissy Field Dog Group retained Kenneth S. Weiner, Esq. of K&L Gates LLP, a nationally recognized expert in the National Environmental Policy Act as well as Tetra Tech, Inc. independent environmental consultants to provide a review of the 2400 page Draft Plan/DEIS. Their review is included in the attached appendices.

After all of the time and effort that has been put into the development of a balanced dog management plan, CFDG is extraordinarily disappointed in the quality of the Draft Plan/DEIS. We are quite dismayed by: (1) the litany of undocumented assumptions throughout the Draft Plan/DEIS; (2) the lack of analysis by the GGNRA of the existing conditions; (3) the failure of the GGNRA to adequately explore the impact of application of existing management measures to the no-action alternative; (4) the failure of the GGNRA to acknowledge that the GGNRA is a recreational area in a major metropolitan area; (5) the failure of the GGNRA to address or acknowledge the scoping comments submitted by CFDG in April 2006; and (6) the failure of the GGNRA to include any of the reasonable alternatives suggested by the a coalition of interested parties at the end of the Negotiated Rule Making process (see Appendix K). The Draft Plan/DEIS improperly treats recreation and environmental interests as mutually exclusive rather than recognizing both as important values under the National Environmental Policy Act as well as the enabling legislation for the GGNRA. In fact, the Draft Plan/DEIS does not even include a section addressing the impact on recreational users. (See Appendix B) The Draft Plan/DEIS includes a

prohibition on certain recreational uses for all new lands without any justification or analysis. Finally the Draft Plan/DEIS proposes a punitive non-transparent compliance program to be internally administered without any public input with uncertain and undefined parameters. Set forth in the appendices attached, are specific comments on each of these points.

We are also very concerned going forward about the transparency of the review process for these comments, allowed under the National Environmental Policy Act, and the ability of the public to have a dialogue with the GGNRA about how to create a sustainable and balanced dog management plan.

The GGNRA plays a critical role in providing a home for many natural and cultural treasures, and, because of its proximity to a dense, urban environment, it provides special recreational opportunities to city dwellers. Recreation is called out in the 1972 GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognized that the achievement of these outstanding values is not mutually exclusive. Our organization supports the National Park Service (NPS) in its mission to protect the GGNRA's important natural, cultural, and recreational values but, through this letter, we challenge the NPS work with its constituents and local communities to find solutions that are designed to protect all of the park's values and broaden opportunities to enjoy its diverse resources sustainably.

Our comments are described in two main sections: (1) Recommended Alternative, which describes our thoughts on how the NPS could balance the GGNRA's myriad resources and opportunities; and (2) Quality of Information in the Draft Plan/DEIS, which describes our thoughts on how the information in the Draft Plan/DEIS could be improved in order to support a better outcome for all interests involved.

Recommended "Hybrid" Alternative The NPS should consider a hybrid alternative that includes the following three interrelated items with a rational approach to balancing preservation of natural and recreational values: ? Adaptive Management Plan ? Management Actions ? Recreation Committee Further information on this alternative is included in Appendix A.

Quality of Information in the Draft Plan/DEIS My organization's major concerns with the quality of information in the Draft Plan/DEIS include: 1. Improper analysis of environmentally preferred alternative. 2. Omission of relevant impacts and impact analyses o Recreation (also see Appendix B) o Other impacts 3. Insufficient information needed to draw logical conclusions and evaluate alternatives: o Unclear enforcement data (also see Appendix C) o Lack of and inconsistent site-specific, scientific data on baseline conditions (also see Appendices D, E, and F) o Reliance on

undocumented assumptions o Flawed evaluation of No Action alternative o Resultant flawed alternatives analysis 4. Improper treatment of new lands 5. Lack of specificity in proposed action

These concerns are described in detail below and several are outlined further in the attached appendices. At the end of each section, we have provided recommended changes that we request you make to the EIS and the proposed action in order to move forward with a plan that is protective of all of the GGNRA's myriad resources and values.

1. Improper Analysis of Environmentally Preferred Alternative The Draft Plan/DEIS takes a narrow perspective that the alternative that most preserves natural values only is the environmentally-preferred option. Where you have a national recreation area whose mission is natural, recreational, scenic and cultural values in a great city ? and all of these values are part of NEPA's view of a quality environment ? the environmentally preferred alternative is the alternative that most promotes all of these core environmental values. Because the Draft Plan/DEIS does not recognize recreational resources as an environmental resource, the analysis of the environmentally preferable alternative is flawed. We point this out because it reflects a bias in the document that systematically does not yet recognize that this plan is for an urban recreation area that needs to ? in the words of GGNRA's own mission: 'preserve natural and recreational values unimpaired.' It fails to consider the range of resources afforded by the GGNRA that could be affected by the action alternatives. Recreation is called out in the GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognizes that the achievement of these outstanding values is not mutually exclusive. The environmentally preferable alternative is one that would employ environmental design and adaptive management techniques to preserve all of the outstanding values of the GGNRA. Further detail on this issue can be found under our comments above related to our recommended hybrid alternative.

*Recommendation. In Chapter 2, starting on page 99, the discussion of the environmentally preferable alternative should be revised to reflect the value of recreational resources. Since protection of the environment includes protection of established recreational opportunities and facilities on GGNRA lands and nearby parklands, the Draft Plan/DEIS should consider such resources as part of its selection of the environmentally preferable alternative. Detailed recommendations on how to revise this section of the Draft Plan/DEIS are listed in Appendix A.

2. Omission of Relevant Impacts and Impact Analyses

Recreation Congress' original intent when it established the GGNRA is

stated in the bill reports for the 1972 legislation ? that GGNRA, "will ensure its continuity as open space for the use and enjoyment of present and future generations of city-dwellers" [House Report No. 92-1391, Sept. 12, 1972]. [emphasis added]. Similarly, as stated in the first section of Public Law 92-589, Congress established GGNRA to preserve for public use and enjoyment areas of Marin and San Francisco County possessing "outstanding natural, historic, scenic and recreational values" and to "provide for needed recreational open space necessary to urban environment and planning" and to protect the scenic and natural character of the area from incompatible development. Dog walking was well-known and recognized by Congress as part of this public use and enjoyment. Both the Senate and House reports comment that the proposed area:

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

The official legislative history notes:

"This legislation will, if enacted, capitalize on the availability of this important, unequalled resource in the San Francisco region by establishing a new national urban recreation area which will concentrate on serving the outdoor recreation needs of the people of the metropolitan region. As an urban recreation area, it must relate to the desires and interests of the people, but it must, at the same time, be managed in a manner which will protect it for future generations." [emphasis added] These were also the City's understandings in transferring lands to GGNRA. As you may know, GGNRA has a mission statement which states:

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

The Draft Plan/DEIS not only fails to disclose and evaluate the impacts of the alternatives on recreational resources in the context of an urban environment, it dismisses the quality of the urban environment entirely on page 22 where it states, "the quality of urban areas is not a significant factor in determining a dog management plan." As recognized in its enabling legislation, one of the most important aspects of the GGNRA is the sharp contrast between its undeveloped open spaces and the adjacent developed urban environment. The GGNRA's open space and recreational opportunities are intended to provide refuge and relief for nearby urban dwellers.

The impacts on the GGNRA's open space and recreational opportunities should have been evaluated fully in the Draft Plan/DEIS, especially since a

NEPA analysis is not limited to the natural environment. According to NEPA, An EIS is required to analyze the human environment. The federal NEPA rules define the human environment and its scope in an EIS as follows:

"Human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." When an EIS is prepared and human and natural/ physical environmental effects are interrelated, the EIS should discuss all of these effects on the human environment.

*Recommendation. Any significant limitations on recreational uses proposed by NPS needs to be properly examined, as it impairs a fundamental value that must be preserved under GGNRA's charter. The Draft Plan/DEIS should be revised to include a stand-alone analysis of impacts on recreation resources in order to fully consider the potentially significant effects that the proposed action and action alternatives could have on these elements of the human environment. The section should give context to the important role played by the GGNRA in terms of its proximity to a dense, urban environment and the special opportunities it affords to nearby populations. It should describe existing recreational uses of the GGNRA and other parklands in the project vicinity, the impacts of the proposed action on recreation resources and urban quality (including direct, indirect and cumulative impacts), and the mitigation that the NPS will commit to in order to avoid such impacts. Although the analysis of impacts on recreation resources could potentially be integrated into the existing Visitor Use and Experience section, it is strongly suggested that it be incorporated into the draft EIS in a separate chapter. The rationale for this request is because the topic of "Visitor Use and Experience" is too limiting to encompass the broader range of recreation impacts that could potentially occur with implementation of the proposed action, including degradation of established recreational activities and facilities in GGNRA and nearby lands. A suggested annotated outline of the stand-alone recreation resources section is presented in Appendix B for your consideration.

Other impacts The Draft Plan/DEIS assumes but does not provide the required rigorous analysis that resource conditions result solely from dog use of the sites, discounting the contribution from other visitors and recreational users. The Draft Plan/DEIS does not address the contribution of other impactful activities, including special events, to the resource conditions and existing impacts at each of the GGNRA sites. The level of site use from a single special event is likely equivalent to the level of regular use that occurs over weeks, months or longer. These special events include the annual Fleet Week at Crissy Field and the future impact of America's Cup on GGNRA lands.

*Recommendation. To address this deficiency, the GGNRA should study the contribution that all visitors make to existing resource conditions and potential impacts. This information is obtainable and essential to a reasoned choice among alternatives. The preferred alternative should then be re-evaluated and modified to address only the issues that specifically result from dog use at each of the sites. The NPS should then pursue a comprehensive approach to managing all these uses to the benefit of the full ranges of GGNRA resources and values.

3. Insufficient Information Needed to Draw Logical Conclusions and Evaluate Alternatives

In many places, the Draft Plan/DEIS does not provide any data on actual impacts by dogs in areas being proposed for new dog walking restrictions. In places where data are provided, the Draft Plan/DEIS makes undocumented assumptions that there are unacceptable impacts and that dogs are the culprits. For example, in the Western snowy plover sections of Chapters 3 and 4, the Draft Plan/DEIS explains that people, as well as dogs, who traverse dune areas disturb shorebirds. Monitoring surveys observed 48 off-leash dogs chasing birds over a period of 12 years. However, in this case the birds continue to return to the area each year. Therefore, there might or might not be a problem ? the Draft Plan/DEIS does not provide substantive data to help the reader decide. If there is a problem, the Draft Plan/DEIS doesn't provide logical conclusions as to whether access should be limited for people, for dogs, or both.

The Draft Plan/DEIS is, in some respects, comprised of about 20 plans and EISs, because it examines each GGNRA unit. We can appreciate how difficult this is for GGNRA and the NPS to accomplish. But NEPA guidance and case law have consistently explained that difficulty does not excuse lack of adequate data and study in an EIS. And the bulk or size of an EIS does not equate to its adequacy. In many places, as described in more detail below, the Draft Plan/DEIS lack any description of actual site specific impacts on which decisions on dog-walking restrictions are being proposed. In other places, the Draft Plan/DEIS assumes species are present in areas where there is no record of their presence. In other places, there is inconsistent information about the presence of species. Unclear enforcement data Many of the findings in the Draft Plan/DEIS are founded on a reference included in the document as Appendix G, "Law Enforcement Data" (NPS 2008c). This reference document is critically deficient in substantiating statements made in the characterization of existing conditions and in the analysis of the environmental consequences. Per NEPA, "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements (CFR 1502.24)." Additional detail on this issue can be found in Appendix C.

*Recommendation. The Draft Plan/DEIS should be revised to provide clear evidence in the record to support all of its findings. The NPS needs to ensure the professional integrity, including scientific integrity, of the analysis and findings contained within its Draft Plan/DEIS. Detailed recommendations on how to revise the enforcement data in the Draft Plan/DEIS, and the ensuing impacts and alternatives analysis, are listed in Appendix C.

Lack of and inconsistent site-specific, scientific data on baseline conditions

The Draft Plan/DEIS does not address site-specific resources and the condition/health of those resources. This lack of information results in a vague baseline against which to assess the magnitude of impacts associated with implementing the proposed action and alternatives. With such a vague baseline, it's also difficult to assess the need to change existing dog management strategies. Select examples: a. The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but no data are provided as to where/if they are actually present. b. While some special-status species descriptions suggest a nexus between dog activity and the species and/or their habitat (tidewater goby, California red-legged frog), other species descriptions do not (San Francisco garter snake, Coho salmon), and there is a consistent lack of detail describing the existing interaction, if any, between the species and dog activity. c. There are inconsistencies regarding the presence of species in the text and in Table 8 in the Special-Status Species affected environment, the information in Appendix H, and the impact analyses in Chapter 4. d. In Table 8 on page 246, the GGNRA Location column contains the location for plants that do not exist there according to the text. e. For a number of the analyses of Alternatives B-E, the Draft Plan/DEIS states that the area of impact is currently undisturbed. This is not the case, as dogs and humans are currently allowed in those areas. f. Additional examples are provided in Appendix D, "Soils and Geology," Appendix E, "Water Quality," and Appendix F, "Biology."

*Recommendation. To address this deficiency, the Draft Plan/DEIS should provide site-by-site assessments of the conditions of the GGNRA resources and values at each of the 21 sites. The selected preferred alternative for each site should then be re-assessed and modified to address only those site-specific issues and to employ adaptive management (proposed adaptive management techniques are provided at the end of this letter) to ensure the goal of protecting those resources and values is achieved. Reliance on undocumented assumptions

The Draft Plan/DEIS assumes, but fails to demonstrate, the "cause and effect" relationships without site-specific supporting information. For instance, the Draft Plan/DEIS assumes but does not demonstrate that where

dogs are present within GGNRA sites, there is a disturbance of natural resources. The Draft Plan/DEIS also assumes but does not demonstrate that the disturbance of resources is attributable to dogs (versus other factors). These assumptions result in flawed conclusions that the mere presence of dogs is equivalent to adverse resource impacts. The findings of an EIS must be based on scientific accuracy and clear evidence in the record. This Draft Plan/DEIS is significantly flawed in that it does not rely on adequate evidence for the conclusions it draws, and in that it fails to clarify its methodology for drawing those conclusions.

Select examples: a. The text from Chapter 3 provides data on the western snowy plover, but beyond providing numbers of observations, the Draft Plan/DEIS does not provide evidence that dogs chasing the birds are likely to impact the survival of the species taking all relevant factors into account (see paragraph 1, page 799). b. The Draft Plan/DEIS presents no information supporting the finding that dogs are currently impacting shorebirds and marine mammals. Therefore, there is no scientific rationale for prohibiting dogs from beach areas under Alternative D to "protect shorebirds and stranded marine mammals," as stated on page 151. c. The Soils and Geology section (page 225) includes the following statements: "Dogs and dog walkers that do not stay on designated trails and venture off trail create social trails that become denuded of vegetation and result in increased soil compaction." and "Soil compaction is common along social trails that have been created by ? and are heavily used by ? bikers, hikers, runners, and dog walkers." The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. At about 200 pounds per adult, the force that a human exerts on the soil one foot at a time would have a significantly greater impact on soil compaction in a picnic area than the force exerted by even a large 70-pound dog distributing its weight on four paws. The failure to acknowledge that human use has more impact on soils and geology in this regard, compared to dog use, uncritically loads the analysis in favor of restrictions on dogs. While there may be areas in which impacts from dogs are unacceptable, the same criterion holds for impacts from humans, and in most of these areas, dogs and humans are already excluded. d. The Soils and Geology section (page 112) on Homestead Valley concludes that, under the No Action Alternative, there would be long-term adverse impacts from "soil compaction, erosion, and nutrient addition.., in areas off the trail since dogs would be under voice control," while under other alternatives it is concluded that the impacts would be negligible because dogs would be under physical restraint. This is an unsubstantiated assumption in support of the underlying bias of the analysis. The analysis does not attempt to connect intensity of use and impact and seems to be based solely on the incorrect assumption that humans and wildlife would have no impact on off-trail areas, and that all impacts can be

attributed to dogs. *Recommendation. To address this deficiency, the NPS should re-evaluate untested, assumed linkages and re-define the existing and potential impacts that specifically result from dog use at each of the GGNRA sites. The preferred alternative for each site should then be re-assessed and modified to address only those site-specific impacts and issues.

Flawed evaluation of No Action alternative

The impacts of the No Action alternative are substantially overstated because the Draft Plan/DEIS determines individual areas of compliance with existing dog management strategies without sufficient supporting data and assumes that noncompliance results in adverse impacts. This unsupported logic both overstates the degree of additional management required to address the resource issues, but also misrepresents the relative impacts of the four action alternatives; for example, the public is assumed to comply with management strategies under an action alternative, whereas the public is found to be noncompliant with those same management strategies under the No Action alternative.

Select examples: a. For many sites, including Stinson Beach, Crissy Field, Baker Beach and Bluffs, Mori Point, Oakwood Valley, and Muir Beach, analysis of Alternative A acknowledges noncompliance, while the other alternatives assume full compliance with dog restrictions. In some cases, the management strategy is the same, with the only difference between Alternative A and the preferred alternative being the assumption of compliance. b. On page 109 (Table 5, Stinson Beach, Soils and Geology) under Alternative A, the second bullet identifies long-term, minor, adverse impacts in areas outside parking lots and picnic areas. These impacts are not repeated under the other alternatives despite the fact that, except for Alternative D, the management strategies under all of the alternatives are identical for Stinson Beach. Each of the statements in the first bullet, except for Alternative A, No Action, includes the clause "assuming compliance." At least for the soils and geology evaluation, the analysis seems to take it for granted that the No Action Alternative is inferior. Both of these are examples of biasing the analysis against No Action. c. On pages 1147-1158, mission blue butterfly, Fort Baker and Milagra Ridge ? as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) and the preferred alternative assumes compliance (negligible to minor, adverse impacts, with habitat restoration programs). d. On pages 1219-1240, San Francisco garter snake, Mori Point, Milagra Ridge, Cattle Hill, Pedro Point ? as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). The text states (page 1230) that there is no documentation. that the current level of compliance with on-leash laws (No Action Alternative) is impacting this species. e. In the Water

Quality section, the impact analysis for Alternatives B through E assumes compliance with the management strategies. However, the impact analysis for Alternative A does not make this same assumption.

*Recommendation. To address this deficiency, the NPS should re-evaluate unsupported assumptions and the analysis of the No Action alternative to ensure the methodology used for it is consistent with the methodology used for the action alternatives. The No Action alternative is a continuation of the current GGNRA management plan and policies ? not a continuation of existing conditions. The current plan and supporting documents include policies for good public information and education on GGNRA resources and partnerships with the community. The No Action alternative can and should include improved education and compliance measures (including accurate signage about voice control areas) to implement these current plan policies (which are also policies in the proposed GGNRA updated general management plan), including dog owner training, to raise the level of compliance. Resultant flawed alternatives analysis

As described above in this section, the Draft Plan/DEIS assumes but does not provide the required rigorous analysis to enable the reader to draw logical conclusions about impacts and alternatives. The Draft Plan/DEIS does not provide adequate information on which to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of resources" (as required by NEPA Section 102(2)(E); 40 CFR "1501.2 and 1502.1 and corresponding DOI and NPS implementing guidance), or to allow meaningful evaluation on the alternatives including reasonable mitigation measures, as required by NEPA (e.g., 40 CFR "1502.14(b) and 1508.25(b) and corresponding DOI and NPS implementing guidance). This issue in the Draft Plan/DEIS results in a bias in the evaluation of alternatives, contrary to NEPA's requirement that "Environmental Impact Statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made" (40 CFR '1502.2(g)).

Select examples: a. The impacts of the No Action Alternative are substantially overstated because the Draft Plan/DEIS assumes that noncompliance results in adverse impacts. This both overstates the degree of management required to address the resource issues, but also misrepresents the relative impacts of the four action alternatives; for example, the public is assumed to comply with management strategies under an action alternative, whereas the public is found to be noncompliant with those same management strategies under the No Action Alternative. b. On page 1264, bank swallow ? as with the western snowy plover, current impacts are considered minor to moderate based on occasional to frequent perceptible disturbances to the species from dogs; however, the description of

Alternative A mentions only that dogs have been seen in the bluff area. There is no apparent nexus between dog activity and actual impact to bank swallows ? is the presence of a dog in the bluff area assumed to disturb the colony? Have the birds been observed flushing from nests, or have crushed burrows been found? The language here suggests these impacts are possible, but that they haven't actually occurred. c. In Chapter 2, starting on page 99, the discussion of the environmentally preferable alternative should be revised to reflect the value of recreational resources. Because the draft EIS does not recognize recreational resources as an environmental resource, the analysis of the environmentally preferable alternative is flawed. It fails to consider the range of resources afforded by the GGNRA that could be affected by the action alternatives. Recreation is called out in the GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognizes that the achievement of these outstanding values is not mutually exclusive.

*Recommendation. To address this deficiency, the NPS should re-evaluate unsupported assumptions and the analysis of the alternatives to ensure the methodology used for it is consistent and based on site specific scientific data. And, since protection of the environment includes protection of established recreational opportunities and facilities on GGNRA lands and nearby parklands, the draft EIS should consider such resources as part of its selection of the environmentally preferable alternative. Under NEPA, the environmentally preferable alternative is one that would employ environmental design and adaptive management techniques to preserve all of the outstanding values of the GGNRA.

4. Improper Treatment of New Lands The proposed action to close new lands to dog walking access conflicts with the GGNRA Enabling Legislation (PC 92-589) and with National Park Service Management Policies (2006) for determining uses and land protection plans. GGNRA is required to consider new lands in the same way that it considers uses and land protection measures on lands within GGNRA. The unprecedented "Closed until open" proposal would violate GGNRA's statutory obligation to preserve and maintain recreational uses, violate sound land planning with the community, and violate NEPA by prejudging alternatives before site-specific public and environmental review. There is no basis for treating new lands differently than existing lands under NPS regulations and policies. Furthermore, there is no such policy in the existing GGNRA General Management Plan and Compendium. The Draft Plan/DEIS notes (p. 36), the enabling legislation states GGNRA's purpose as follows (emphasis added):

"In order to preserve for public use and enjoyment certain areas of Marin and San Francisco counties, California, possessing outstanding natural, historic, scenic, and recreational values and in order to provide for the maintenance of needed recreational open space necessary to urban

environment and planning, the Golden Gate National Recreation Area is hereby established."

The phrases "preserve for public use and enjoyment" and "maintenance of needed recreational open space" set out a high standard for management actions that would limit or restrict this fundamental value and resource of the GGNRA. The words "preserve" and "maintain" mean the continuation of uses, recognizing that uses may be regulated to protect the other fundamental values of the GGNRA. NPS management policies expressly reflect this emphasis on continuing uses, measured by the yardstick of the unit's enabling legislation. Section 1.4.3.1 states:

In determining whether or how to allow the use, park managers must consider the congressional or presidential interest, as expressed in the enabling legislation or proclamation, that the use or uses continue.

When new lands become part of GGNRA, the recreational uses existing at the time of acquisition should be allowed to continue unless GGNRA determines, through the public land planning and NEPA process, that unacceptable impairment would occur (as explained in Chapter 1 and Appendix C of the Draft Plan/DEIS).

Section 3.3 of the NPS management policies make clear that protective measures are to be integrated in to the planning process -- "Planning for the protection of park lands will be integrated into the planning process for park management" -- not predetermined in advance of site specific the public planning and environmental review process. In preparing land protection plans, Section 3.3 requires: "A thorough review of a park's authorizing statutes and complete legislative history will be conducted as part of the land protection planning process."

Section 3.3 states that land protection plans should determine what "means of protection are available to achieve the purposes for which the unit was created." As noted above, recreational use is one of the basic purposes for which GGNRA was created. Dog walking was contemplated as a traditional use in GGNRA and was plainly discussed in both the Senate and House bill reports, basic legislative history documents.

In the Introduction to land protection, the NPS management policies state (chapter 3, emphasis added):

The National Park Service will use all available authorities to protect lands and resources within units of the national park system, and the Park Service will seek to acquire nonfederal lands and interests in land that have been identified for acquisition as promptly as possible. For lands not in federal ownership, both those that have been identified for acquisition and other

nonfederally owned lands within a park unit's authorized boundaries, the Service will cooperate with federal agencies; tribal, state, and local governments; nonprofit organizations; and property owners to provide appropriate protection measures.

To fulfill this obligation, GGNRA needs to cooperate with these entities, including nonprofit community groups and property owners adjoining GGNRA, to protect recreational resources. As Management Policy 1.4.3.1 directs:

Where there is strong public interest in a particular use, opportunities for civic engagement and cooperative conservation should be factored into the decision-making process.

GGNRA is aware of the strong public interest in dog walking access, and of the interest of San Francisco and Marin Counties and responsible community and nonprofit organizations in cooperative conservation. It is entirely inappropriate and contrary to these management policies to close new lands to dog walking access without first providing opportunities for this civic engagement and for cooperative conservation efforts.

In conclusion, there is no basis in existing law or adopted policy for the NPS and the GGNRA dog management plan to summarily reject and fail to preserve and maintain an important recreational use on new lands that is allowed on existing lands, particularly in advance of sound environmental review and land use planning. This Plan and Draft Plan/DEIS do not provide this review and planning, because by definition, new lands have not yet been fully studied, acquired or subject to the level of site specific review required of this EIS.

For reasons noted above, it is inaccurate wrong to treat dog walking as the establishment of a "new use" in GGNRA, which would be the result of the proposed policy. We understand GGNRA's desire to create a presumption against continuing this use, however, there is no factual, legal, or management policy basis for this approach.

*Recommendation. The preferred alternative should be revised to make clear that new lands will be treated the same as any other GGNRA lands and follow the same NPS management policies. Recreational uses should be allowed to continue except as may be regulated through site-specific public land planning processes and associated environmental review.

5. Lack of Specificity in Proposed Action The description of Elements Common to Action Alternatives (pages 63-67 in the Draft Plan/DEIS) describes the proposed 75% compliance standard and secondary management response, but does not provide details of the monitoring plan or

other elements of an adaptive management plan on which the management response would be based. The draft Plan/Draft Plan/DEIS does not propose an adaptive management component that meets applicable guidance and that can be meaningfully reviewed, as called for in NEPA procedures and current Council for Environmental Quality (CEQ) mitigation and monitoring guidance (January 2011), including but not limited to pages 9-11 and pages 13 and 19 (on the role of the public in the design and review of results).

Select examples: a. The Draft Plan/Draft Plan/DEIS states (page 1725) that "the compliance-based management strategy is an important and effective tool to manage uncertainty when proposing new action" and "has been created" to assure successful implementation and long-term sustainability. However, the detailed description of this critical element has not been conveyed and is not included in the document (as noted on page 64). b. The Draft Plan/DEIS doesn't establish how or why a special-status species that has been sharing habitat with dogs for decades will experience an actual, likely benefit from stricter dog management, given other factors affecting the species. c. Where management actions that limit recreational access are proposed or under serious consideration, the Draft Plan/DEIS should also disclose whether access will be limited for people as well as dogs. The evaluation of significance under NEPA requires consideration of context and intensity. Meaningful public comment on proposed management measures is not possible without full disclosure of the impacts to all users and potential management measures. *Recommendation. To address this deficiency, the NPS should fully disclose the details of the proposed action. It should describe how it will monitor compliance and resources and values at specific sites because the management measures are specific to GGNRA sites. In addition to assessing the condition of these resources and values, monitoring should also focus on determining the contribution to those conditions from other users and factors, including other human users and natural processes. This should be implemented as part of each alternative. Only through this objective monitoring approach can the GGNRA demonstrate that it has addressed the purpose and need on which the Dog Management Plan is based. Existing or proposed management strategies should be modified based on the objective monitoring results. Although it could be appropriate to use properly measured rates of compliance as an indicator, the draft Plan and Draft Plan/DEIS does not provide adequate information about the compliance-based program. To ensure objectivity, this monitoring should be conducted by an independent qualified third party with the results discussed with interested groups and made publicly available as part of a defined and technically-sound adaptive management program. Additional recommendations on management actions that should be considered by the NPS are provided below.

Concluding Comments

In conclusion, CFDG is committed to working with the GGNRA to implement a reasonable balanced dog management plan that is based upon accurate facts and science and that balances all of the values identified in the 1972 GGNRA enabling legislation.

Sincerely,

Martha Walters Chair, Crissy Field Dog Group

cc: Sen. Diane Feinstein Rep. Nancy Pelosi Rep. Norm Dicks Rep. Doc Hastings Secretary Ken Salazar NPS Director Jon Jarvis Mayor Ed Lee Supervisor Scott Wiener San Francisco SPCA Marin Humane Society Peninsula Humane Society- SPCA

Enclosures: Appendix A: Hybrid Alternative Appendix B: Recreation Resources ? Suggested Annotated Outline Appendix C: Additional Comments Related to Appendix G, "Law Enforcement Data" Appendix D: Additional Comments Related to Draft Plan/DEIS Analysis of Geology and Soils Appendix E: Additional Comments Related Draft Plan/DEIS Analysis of Water Quality Appendix F: Additional Comments Related Draft Plan/DEIS Analysis of Biological Resources Appendix G: Testimony of Kenneth S. Weiner on Behalf of Crissy Field Dog Group Before San Francisco Board of Supervisors Appendix H: Testimony of Rebecca Katz Director of San Francisco Animal Care & Control Before San Francisco Board of Supervisors Appendix I: Testimony of Andrea Buffa Before San Francisco Board of Supervisors Appendix J: Testimony of Keith McAllister Before San Francisco Board of Supervisors Appendix K: CFDG Scoping Letter and Proposal from Negotiated Rule Making

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| Correspondence ID: | 4090 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 00:00:00 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. I am especially in favor of off-leash dog access at Ocean Beach in San Francisco and Fort Funston in San Francisco. Honor the existing "1979 Pet Policy" and provide balanced off-leash options for new lands acquired since 1979. | | |

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|---------------------------|----------------------|-----------------------|------------------------|
| Correspondence ID: | 4091 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 20:13:24 | | |
| Correspondence | Web Form | | |

Type:

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

VIA E-mail

This is a supplemental letter to accompany our comment letter which Crissy Field Dog Group hand delivered to your office on May 27, 2011 which will provide additional rationale and explanation to support our recommendations in Appendix A of that letter for Crissy Field. Background: Crissy Field Environmental Assessment The GGNRA released the Crissy Field Environmental Assessment (CF EA) in 1996, which found a Finding of No Significant Impact (FONSI) after going through an extensive five-year public involvement process. In the CF EA, the GGNRA increased the "voice command off leash dog walking" area from 38 to 70 acres at Crissy Field. In the CF EA, the GGNRA identified "dog walking" as a popular and valued activity at Crissy Field" (Page 2-30) and "would be a beneficial impact on recreation opportunities for dog enthusiasts" (Page 4-11). Current zones -- Areas that were identified in the CF EA Proposed Action for "Allowable area for off leash dog-activities" included East Beach, Central Beach, the Promenade, the Grassy Airfield, and the beach east of the U.S. Coast Guard station.

Moreover, the promenade had very limited wheelchair access before the restoration and a concerted effort was made by the GGNRA to "make the entire site accessible, ramps added at boardwalk, overlooks, picnic areas, promenade" (Page 10) to provide accessibility for people with disabilities. And many older citizens walk their dogs off leash here as it is a level surface and is easier to walk on than the beach areas. Designed for compatibility with restoration -- In addition, Crissy Field was intentionally restored, designed and constructed in a way that is complimentary for off leash, voice control dog walking. For example, on Page 2-23, the Proposal included the development of a 20-acre Tidal Marsh. "The tidal marsh was designed with a vegetated buffer zone ranging from 30-50 feet in width along the north side to 50-200 feet width along the south, east and west shoreline. This buffer consists of dune scrub species, which create a dense buffer between humans and wildlife as well as to provide upland habitat associated with the tidal marsh. Barrier fencing set within the vegetation deters dogs, cats, and visitors from getting into the marsh and disturbing wildlife. ?And there are two eastern overlooks that separate the promenade by fencing, barrier walls and a self closing gate to increase public safety and to ensure that off leash dogs do not have access to these areas."

Western Snowy Plover protection -- Since the CF EA, the GGNRA designated the West Beach (the beach east of the U.S. Coast Guard Station) a Wildlife Protection Area (WPA) in 2006 to protect the federally threatened

Western Snowy Plover who rests there for a portion of the year. There is a seasonal restriction in place that currently allows for dogs to walk on the water's edge on leash and for approximately two months, dogs may be off leash under voice control. As you are aware, CFDG has worked closely with GGNRA staff and the Golden Gate Audubon Society in developing and sustaining an educational outreach program to protect the Western Snowy Plover for ALL visitors since 2006. Cleanup -- As another element of our efforts to partner with GGNRA to protect the area's natural resources and visitor experience, CFDG provides thousands of doggie bags every year, which are distributed in the 17 dispensers at Crissy Field by CFDG volunteers on a DAILY basis. Every day is a clean up at Crissy Field for us.

Supplemental Comments

After carefully reviewing the GGNRA draft Plan/draft EIS, we were extraordinarily surprised by the preferred alternative for Crissy Field, which would drastically reduce the amount of off leash, under voice control areas without a clear technical basis or explanation for the proposed variance from the analysis in the CF EA. This DEIS does not provide any substantial new empirical or analytical information that would support changing the conclusions and recommendations in the CF EA. Visitor use ? Our recommended alternative (Appendix A) is based on two facts, one of which is stated in the draft Plan/DEIS, and one of which is indirectly acknowledged but not analyzed in the draft Plan/DEIS.

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

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

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

For example, Page 71 of the DEIS asserts: "Particularly on nice days, the high level and variety of visitor uses have resulted in conflicts, including intimidation, dogs knocking people over, dog-on dog fights and dogs biting people". We have looked through this 2,400-page document, and have found nothing to substantiate this anecdotal assertion. Examination of the enforcement data summary table in Appendix G of the DEIS (Page G-1 to G-2) frequently cited in the DEIS, indicates does not support this assertion and indicated limited problems (see Appendix C of CFDG comments). CFDG is not suggesting that conflicts never occur, whether among human visitors or among people and dogs. As noted above, CFDG understands that there are several hundred special events at Crissy Field totaling thousands of people who normally would not go to Crissy Field, as well as the safety hazard by bicyclists on the promenade. There are solutions that need to be examined and incorporated into the proposed plan, such as providing bicyclists with a clearly signed alternative route (and speed limit) in the bike path along Mason Street to access Crissy Field. We are likewise willing to explore reducing potential conflicts and improving access for off leash dog walkers relative to the promenade. Clear rules and signage? Our recommended plan includes better signage as well as effective outreach and education proposed by GGNRA. For example, CFDG is not aware of kind of signage other than the GGNRA has posted designating "Voice Control" areas for dog walking at Crissy Field. The only signage that has been posted is for the WPA at West Beach to protect the Western Snowy Plover, which CFDG supports.

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

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

Conclusion

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

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

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

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

Sincerely, Martha Walters Chair, Crissy Field Dog Group

May 30, 2011

Correspondence ID: 4092 **Project:** 11759 **Document:** 38106

Received: May,30,2011 20:14:04

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Building 201, Fort Mason

San Francisco CA 94123-0022

Re: Draft Dog Management Plan, Draft Environmental Impact Statement

Dear Superintendent Dean,

My name is Juleen Konkel and I have lived in San Francisco for 14 years. I am writing this letter in support of Alternative A, the No Action alternative of the DEIS, as it relates to the GGRNA. Since moving to San Francisco, I have enjoyed the GGNRA daily with my dog Zorro on our morning runs. As a responsible dog guardian, I have always kept my dog under voice control and in my sight whenever in any area he is off leash. I am a daily user of the GGNRA and always clean up after him and keep him from passing into the fenced off areas.

EXERCISE AREA I have trouble with the GGNRA's preferred alternative plan in that it severely limits and affects the off leash dog walking area at GGNRA. There is nothing better than running from Fort Mason to Fort Funston with my dog next to my side.

SAFETY My dog is my running and outdoor partner. The GGNRA trails are part of an urban environment, and I know and have heard of many stories where single women have been assaulted. It is an unfortunate aspect urban life, but needs to be addressed. I do not use trails that do not allow dogs when I am hiking or running alone. I feel that the DEIS has failed to analyze the impact of restricting the off-leash area and its impact on single women users which comprise a large number of the overall users of the area.

RECREATION and SOCIAL FACTORS For People The GGNRA allows me and so many other urban residents the recreation that we need. The current availability of paved trail and off-leash running at Fort Mason, Fort Funston, Crissy Field, and Ocean Beach perfectly accommodates the recreational needs of people like myself, and allows us to keep ourselves and our wonderful companions healthy and exercised.

There is another social aspect to Draft Dog Management Plan that disturbs me. Our daily walks, necessitated by our dogs' need for exercise, also allow us to get out of our homes and socialize with others. One can, of course, avoid "chatting" with others, but at the same time and if one wants, it is always easy to begin conversations with other dog walkers. Always pleasant, often informative, never awkward, even brief ones, help one feel less alone, less isolated. Indeed, most of the friends and acquaintances that I have made have been made while pursuing canine activities. I treasure this aspect of my frequent dog walks and runs. I trust I speak for many, many other SF residents that I meet daily.

ENVIRONMENTAL IMPACT Bottom line the GGNRA in San Francisco is urban parkland with a mandate for recreational use. The balance needs to be better signage and enforcement of current rules not more restrictions which may or may not be enforced. I agree failing to pick up dog poop, allowing dogs to harass wildlife, planted areas, and other should not be allowed, however in the overall schema these "infractions" are few

compared to GGNRA's own statistics. It would be nice to see the current rules enforced before adopting more stringent rules against a large populace of park-goers.

I attended an Open House put on by the GGNRA (at San Francisco State University), and had an opportunity to observe the plans for changes. The allowable off-leash area currently available at Fort Mason, Fort Funston, Crissy Field, and Ocean Beach perfectly meet the recreational and social needs of people and dogs alike. I feel that the "preferred alternative" choice that I learned of failed to accurately analyze the need for residents of this urban area.

I trust that the GGNRA, in developing a general management plan, will take into consideration and respect the specific character and situation of the San Francisco GGNRA. I fully support Alternative A, the No Action alternative of the DEIS, as it relates to the GGRNA.

Respectfully,

Juleen Konkel

Correspondence ID: 4093 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: /Users/marthawalters/Desktop/deis stuff/cf deis comments/cfdg_deis.ltr2.pdf

Correspondence ID: 4094 **Project:** 11759 **Document:** 38106
Received: May,30,2011 20:16:48
Correspondence Type: Web Form
Correspondence: Please don't further restrict access of dogs to off-leash access to open spaces. It makes for better pets and quality if life for all involved. There are so few places already.

Correspondence ID: 4095 **Project:** 11759 **Document:** 38106
Received: May,30,2011 20:20:43
Correspondence Type: Web Form
Correspondence: For thirty years, almost daily, I have been walking the Oakwood Valley Fire Road and Oakwood Valley Trail -- it is an elongated loop. I always go with my dog. We live nearby. I've always referred to this area as 'my backyard'. I take care of it like it is my own -- primarily by picking up trash left by

humans and removing the invasive vine that showed up there a few years ago which the Park Service has actively been extracting. I love this place. Walking here with my dog has been my sustenance.

I rarely walk further than the proposed second Double Gate because of the steep incline.

I hope you will leave these two parts of your trail plan untouched by new restrictions. My local neighbors and myself have been stewards of these trails for many years. I hope you will allow us to continue.

Fencing and double gates seem a disruption to the rough natural beauty, the sense of open wilderness, and rhythm of the place. Any fence that allows the bobcat, coyote, and deer to pass uninhibited will not stop a dog. We dog-handlers are quite aware of where the trail is and can keep our dogs on the trail. If a dog goes off-trail, I can assure you it doesn't go anywhere but on paths established already by the animals who live there because the blackberry bushes, poison oak, and other bushes form a thick undergrowth. I am also concerned about even constructing the fencing. The building process would destroy current habitat for small critters (birds, chipmunks, mice, rats, snakes, slugs).

If I must keep my dog on a leash, I will; however, there is protocol I follow for meeting other people with dogs and people without dogs so everyone is comfortable. In my thirty years I have met only one person who was afraid of dogs. My dog was on a leash & we gave that person the right-of-way to the trail.

I often meet people on the trail without dogs who are there specifically wanting to interact with the dogs who are taken there to walk the trail. These people usually either can't have a dog of their own or they've recently lost their companion. Of course, my dog is ever ready to cozy up to anyone who needs his attention. Dogs have a wonderful innate sensitivity to us humans.

I have tried to imagine a flexible schedule for potential rules applications. Since weekends and holidays increase usage of the trails by outside visitors to the park, having our dogs on leash could perhaps be a good measure. However, during the week the trail is so quiet. I would like to see the local people able to continue to use the trail in our relaxed manner. We've taken good care of this area for a long time. We have respect for the treasure in our midst. We love it.

I am grateful to you for taking my thoughts into your consideration.

All My Relations, Jane Perkoff

Correspondence ID: 4096 **Project:** 11759 **Document:** 38106

Received: May,30,2011 20:24:44

Correspondence Type: Web Form

Correspondence: The following remarks were written and submitted by my wife, Jane Perkoff. I share all the experiences described. I completely agree with and endorse her comments. For thirty years, almost daily, I have been walking the Oakwood Valley Fire Road and Oakwood Valley Trail -- it is an elongated loop. I always go with my dog. We live nearby. I've always referred to this area as 'my backyard'. I take care of it like it is my own -- primarily by picking up trash left by humans and removing the invasive vine that showed up there a few years ago which the Park Service has actively been extracting. I love this place. Walking here with my dog has been my sustenance.

I rarely walk further than the proposed second Double Gate because of the steep incline.

I hope you will leave these two parts of your trail plan untouched by new restrictions. My local neighbors and myself have been stewards of these trails for many years. I hope you will allow us to continue.

Fencing and double gates seem a disruption to the rough natural beauty, the sense of open wilderness, and rhythm of the place. Any fence that allows the bobcat, coyote, and deer to pass uninhibited will not stop a dog. We dog-handlers are quite aware of where the trail is and can keep our dogs on the trail. If a dog goes off-trail, I can assure you it doesn't go anywhere but on paths established already by the animals who live there because the blackberry bushes, poison oak, and other bushes form a thick undergrowth. I am also concerned about even constructing the fencing. The building process would destroy current habitat for small critters (birds, chipmunks, mice, rats, snakes, slugs).

If I must keep my dog on a leash, I will; however, there is protocol I follow for meeting other people with dogs and people without dogs so everyone is comfortable. In my thirty years I have met only one person who was afraid of dogs. My dog was on a leash & we gave that person the right-of-way to the trail.

I often meet people on the trail without dogs who are there specifically wanting to interact with the dogs who are taken there to walk the trail. These people usually either can't have a dog of their own or they've recently lost their companion. Of course, my dog is ever ready to cozy up to anyone who needs his attention. Dogs have a wonderful innate sensitivity to us humans.

I have tried to imagine a flexible schedule for potential rules applications. Since weekends and holidays increase usage of the trails by outside visitors to the park, having our dogs on leash could perhaps be a good measure. However, during the week the trail is so quiet. I would like to see the local people able to continue to use the trail in our relaxed manner. We've taken good care of this area for a long time. We have respect for the treasure in our midst. We love it.

I am grateful to you for taking my thoughts into your consideration.

All My Relations, Simon (and Jane) Perkoff

Correspondence ID: 4097 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent?Golden Gate National Recreation Area?Fort Mason, Building 201?San Francisco, CA 94123-0022 Dear Mr. Dean, My husband and I are both "senior citizens" who live in the Sunset District in San Francisco. We have been bringing our dogs to Fort Funston for the past eleven years. Typically, we go to the "Fort" two to three times a week. Over the years we have found that the people who go to Fort Funston with their dogs represent a community. That community is very diverse: by age, by gender, by ethnicity, and national origin. This is a community that cares about dogs, the environment, and San Francisco. In our experience, the great majority of dog owners who take their dogs to the GGNRA are responsible individuals who pick up after their dogs and respect the environment. (As an aside, over the years I have seen very few dogs chase birds; however I have seen quite a few small children chase birds with their parents' encouragement. What is the remedy for that situation?) We go to Fort Funston for our health: our physicians tell us we must walk to remain healthy, and dog behaviorist tell us that vigorous exercise is important for our dog's health. In our experience, they are correct. Our blood pressure is down and our dog is calm. Walking with our dog is also a recreational activity for us. It has always been my understanding that the GGNRA has a mandate to support recreation on its lands. Eliminating off-leash dog walking would in effect end recreation in the GGNRA for us, and well as for others. Further, the DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. Eliminating off-leash dog walking at the GGNRA will put put an enormous burden on off-leash parks in the Bay

Area; local government is not prepared to deal with that. The GGNRA does not appear to want to work with the community in developing a solution to the issues in the DEIS. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Judy and Jerry Pelzner San Francisco, CA 94122

Correspondence ID: 4098 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean,

I live in the Presidio and absolutely love it - it is a treasure to the city and to all visitors! I am also a dog owner who frequents Crissy Field and other parts of the Presidio daily. Being able to have my dog off-leash on the beach to socialize with other dogs is an intregal part of my life. The dog owners that I see are responsible people and the dogs are well mannered and under control.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979

Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration.

Sincerely, Liz Branham

Correspondence ID: 4099 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979 Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

Correspondence ID: 4100 **Project:** 11759 **Document:** 38106
Received: May,30,2011 20:41:23
Correspondence Type: Web Form

Correspondence: VIA E-mail

May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I have been a Bay Area Resident and have lived and worked in San Francisco and Marin counties since 1978. I have explored beaches and trails throughout these areas for many years with my current dogs Grace and Space and my former dogs. My girls and I are eager partners for our daily outings that connect us to the recreational pleasures of places like Crissy Field, Baker Beach, Lands End, Ft. Miley Upper Fort Mason, Marin Headlands, and Muir Beach. These daily outings keep us connected and balanced for the demands of a busy life.

My dogs and I have attended training sessions to learn basic obedience skills and recall. Both are well socialized to both people and dogs and are exceptional companions at home, around town and on the trail. I expect my dogs to be well behaved and responsive to voice commands on leash and off. I leash my dogs to keep them from sensitive areas and clean up after my dogs. As a dedicated hiker/walker/bicyclist, I also educate fellow dog and non-dog enthusiasts about canine/human//bike interactions. On walks, I educate friends about the native plant/animal communities.

I have worked professionally as an environmental scientist/senior environmental project manager for over twenty years in both the public and private sectors. During this time, I worked for the US EPA, National Park Service (on loan to the GGNRA for work on the Presidio Project) and the San Francisco Redevelopment Agency. I understand the complexities of developing a fair and balanced dog management plan within the GGNRA. In addition, I have been a long-term member and supporter of NRDC and The Nature Conservancy.

For the past ten or more years, I have been the chair (and co-founder) of the Crissy Field Dog Group and have worked extremely hard to work with the GGNRA (and with the late GGNRA Superintendent Brian O' Neill) and other environmental and recreational groups to figure out a reasonable and viable alternative/solution for this complex dog management issue.

So it was to my great disappointment and surprise when the GGNRA released your draft Plan/EIS. I do not agree with the GGNRA's current

preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (GGNRA's 1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions and do not provide a basis to change dog walking areas under voice control as identified in the 1979 Pet Policy. It is essential for the GGNRA to consider reasonable and balanced alternatives for off leash dog walking on existing lands.

While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting off leash dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The additions I would add to what you call Alternative A (No Action) would be a Hybrid or Modified Alternative A which would include the inclusion of the "New Lands", in San Mateo and Marin Counties and the application of the following management measures that would support a reasonable, realistic and enforceable dog management plan.

The Hybrid Alternative, includes the 1979 Pet Policy (Alternative A: No Action-existing conditions), include the New Lands, and the implementation of management measures, which include but are not limited to more, better and clearer signage, a robust educational program that would include partnering with local animal welfare groups such as the San Francisco SPCA, Marin Humane Society and the Peninsula Humane/SPCA at a minimum. Other measures include the use of environmental or vegetative barriers, and low-level post and cable fencing to protect a plant species such as the blue lupine. I also support the creation of a "recreation team or panel" who can assist the GGNRA with issues regarding all recreational visitors in a public forum on a quarterly basis.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a scientific baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure as the goal. As a matter of fact, Eco-dog (with a letter from the San Francisco SPCA) has submitted a draft Compliance Based Adaptive Management Program that proposes a viable alternative to this approach that proposes a constructive and transparent compliance program to be

administered with public input with clear and defined parameters.

The DEIS also fails to consider that the GGNRA is the front/back yard for a large metropolitan area. I live in Marin County and have strong ties to the lands of the GGNRA, as do many of my friends and fellow dog enthusiasts that live in San Francisco/North/East/South Bay Counties and beyond. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area.. NEPA requires evaluation of impacts on the "human environment": the DEIS fails to do so by failing to adequately address how the proposal will affect "recreational" values as well as natural, scenic and cultural values on residents of the Bay Area..

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as adversarial values i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment. I believe I am a good steward of the environment and I believe that many of my fellow dog lovers are also good stewards. This bias extends to the overall document, pitting recreation vs. natural values rather than identifying and exploring reasonable alternatives where nature/recreation can work together. And as a matter of fact, if you do a word search in Chapter 4 of the DEIS, you will find that the word "may" is used approximately 3300 times and the word "potential" is used approximately 1100 times.

Further, the proposed broad limitations in the DEIS are largely without site-specific science that demonstrates that the perceived degradation of the quality of the GGNRA's natural resources are actually attributable to dogs vs. other factors. For example, much of the impact on native dune habitat that I have seen at south Ft Funston is due to non-native/invasive species, erosion, and equines and transients/homeless encampments vs. foot/dog traffic.

There are many other concerns that I have but I want to be clear that the Golden Gate National Parks Conservancy's "Crissy Field Center" as identified on page 361, is a TEMPORARY relocation due to the deconstruction and construction of the Doyle Drive seismic retrofit work. Please correct this misinformation. Cal Trans is using the Crissy Field Center as their headquarters during this work in a deal that Cal Trans would re-build the interior of the old Crissy Field Center and provide "State of the Art" technology after the Doyle Drive construction is finished. Doug Overton of the GGNPC "promised" that the move to the eastern portion of Crissy Field would be temporary until the Doyle Drive project is completed. In addition, because the Crissy Field Center has temporarily relocated, it has caused an increase in traffic and parking availability (a BIG negative) for all

visitors at Crissy Field.

And for the other sites that may fall through the cracks, I am very concerned that there is no technical or scientific basis for change at all of the Marin sites, Baker Beach (beach nudity is the biggest concern-not off leash dog walking), Lands End/Fort Miley and of course Upper Fort Mason. Folks have been walking their dogs off leash for years at Upper Fort Mason and even the late GGNRA Superintendent Brian O' Neill did not mind but actually enjoyed the dogs there. This area is primarily frequented by folks who live in the neighborhood who come with their dogs? a LOT of older people and working people who are very responsible and clean up after their dogs and there are VERY few dog conflicts. There is a very tight knit dog community at Upper Fort Mason as well as in the other areas under consideration in your GGNRA dog management plan.

For Fort Funston, I offer the following as a compromise:

Leash-only from the upper parking lot to the south edge of Fort Funston, inclusive of the parking lot, hang gliders' take-off area, and observation deck. Leash-only along the Sunset Trail (including the area west to the ocean and 20' along the eastern side), starting at the upper parking lot, going all the way to the center beach access (following the trail closest to the ocean).

Move the center water fountain further east (to the top of the John Muir trail sand ladder).

Here are the problems that get solved with this solution:

Eliminate the danger to hang-gliders of dogs chasing them at take-off and landing. Eliminate the danger to equestrians when they are riding along the south cliff area to get to the beach. Provide visitors who do not want to encounter off-leash dogs with a hike along the most beautiful trail at Fort Funston (overlooking the ocean).

And I think that all of the sites in San Mateo County have not been adequately analyzed, as there is no legal basis for what you call "New Lands". These "New Lands" in San Mateo County (and Marin County too) should be treated as "existing lands". There is no case law or anything in the GGNRA's compendiums or the current GGNRA General Management Plan to support your conclusions about treating these lands differently.

And one other point that needs to be conveyed is the fact that according to the GGNRA's PEPC website regarding the GGNRA's new General Management Plan (GMP) Newsletter #5, dated Summer 2009, states that "the new plan will not revise decisions made in recent management plans for

the Presidio, Crissy Field, Fort Point or Fort. Baker". Simple logic should prevail that the Crissy Field Environmental Assessment will stand as is and 70 acres of off leash dog walking under voice control remains in place as was approved by the GGNRA/NPS. Clearly there is a discrepancy between the GGNRA's draft Dog Management Plan/DEIS and the new GGNRA GMP.

Again, after careful consideration, I support Alternative A, the No Action alternative and would also include the "New Lands" areas in San Mateo County and Marin County. The DEIS is biased against the No Action alternative and failed to take a good look at this as a reasonable alternative. There are many areas in the GGNRA where the 1979 Pet Policy has been working and where sensitive species are not present and conflicts occur infrequently or not at all. The ways of improving how GGNRA carries out/administers the current 1979 Pet Policy should be considered and given a fair assessment. I believe that the current management plan will work for the many years if "tweaked" to provide clearer rules, improved compliance and reduced potential for conflicts. The majority of the "problems" with the current plan are problems include unclear or non-existence signage, inadequate management and implementation and a lot of specific education versus. access. If there are problems with access, then the DEIS doesn't provide a scientific or technical basis for the severe limitations proposed on continued off leash under voice control dog walking.

Thank you for your consideration.

Respectfully,

Martha Walters San Rafael, CA 94901

Cc: Senator Dianne Feinstein Senator Barbara Boxer The Honorable Nancy Pelosi Rep. Jackie Speier Rep. Lynn Woolsey Rep. Anna Eshoo Secretary Ken Salazar Mr. Jon Jarvis, Director San Francisco SPCA Marin Humane Society Peninsula Humane Society Crissy Field Dog Group Fort Funston Dog Walkers

Correspondence ID: 4101 **Project:** 11759 **Document:** 38106
Received: May,30,2011 20:43:01
Correspondence Type: Web Form
Correspondence: My name is Morton Stein; I am a medical doctor and I have lived in Mill Valley for more than 30 years. I work in San Francisco, but I spend a large amount of my recreational time with my dogs in the GGNRA.

It is important to me to be able to take my dogs to Muir Beach, Rodeo

Beach and on the Coastal Trail, among other places which offer the opportunity for me and my dogs to get exercise, "decompress" and enjoy the spectacular environment in which we are fortunate to live.

Two to four times every week I take the opportunity to hike and play with my dogs in these areas. They are crucial to me and my pets as places that offer an opportunity to run and hike and enjoy the outdoors of Northern California. It is one of the main reasons that I have chosen to live in Mill Valley.

I am a responsible dog owner, and I keep my dogs under careful voice and sight control at all times that they are off-leash in these areas.

It is my understanding that the "R" in GGNRA was put there to emphasize how important it is that this area was established as a "recreational" area for us all. In the highly urbanized area in which we live, this unique natural environment for me and my dogs is VERY important to my physical and emotional well being. If the opportunity to access this recreational environment is reduced or eliminated, I and my dogs will suffer greatly, both physically and emotionally.

I have read parts of the GGNRA's proposal and I do not agree with the conclusions that dogs are a disturbance to the environment. It is irrefutable that humans have a much greater negative impact on this environment than do our dogs.

The proposal that I have reviewed does not provide credible, legitimate scientific justification to show that dogs have a significant negative impact on the flora or fauna of the GGNRA. I believe that it would be unacceptable to alter the access to the limited areas that it is currently available for dogs and their caregivers without providing valid, scientific evidence to support those changes. Clearly the access to human walker, hikers and bike riders, as well as horses and their riders, and other forms of recreational activity in the GGNRA as well as people who choose to access this area with their dogs is why the "R" is a part of the naming of the GGNRA. It is an area which needs to be preserved for recreation for all of us.

Sincerely, Morton Stein.

Correspondence ID: 4102 **Project:** 11759 **Document:** 38106
Received: May,30,2011 20:53:43
Correspondence Type: Web Form
Correspondence: I would like to add the following comments about the GGNRA DEIS for a Dog Management Plan.

The DEIS did not consider management strategies that could be added to the 1979 Pet Policy to address any problems that do occur. These strategies were also not considered with respect to the No Action Alternative and they should have. These strategies include:

1) Education -- not just education to tell people where they should not be. But rather education that actually addressed problems. For example, SFDOG has held dog-horse workshops to socialize dogs to the presence of horses. If these workshops were held at Fort Funston, for example, it would alleviate any problems between horses and dogs at the Fort. When these programs were held regularly in the East Bay Regional Parks, negative incidents between dogs and horses decreased by nearly 90% (private communication from Oakland Dog Owners Group). Similarly, education training programs that work on improving recall and preventing jumping would go a long way toward reducing negative interactions between people with dogs and other park visitors. If the GGNRA would work with dog groups, rather than just trying to kick them out, what few problems occur would be easy to address. The DEIS assumes conflict between park user groups, rather than encouraging them to work together to resolve problems. The latter is the way we deal with issue in San Francisco. The GGNRA should respect that way of dealing with problems and encourage different park user groups to work together.

2) Signage -- not just to say STAY OUT. But rather signs to explain why you should leash your dog in an area, or why the area has been closed.

3) Cliffs -- If the GGNRA argues that they must keep dogs off of the Sunset Trail at Fort Funston because dogs might go over the cliffs there, they should first consider planting low-lying vegetation barriers (shrub, bushes) along the cliffs to keep both people and dogs away.

In addition, the DEIS should add the following off-leash, voice control areas in San Mateo: 1) a voice control trail from the Bay-side to the Coast-side on Sweeney Ridge (e.g., Sneath Lane to Fassler) 2) Mori Point off-leash, voice control everywhere except on-leash around the frog ponds and traffic areas and no dogs on the the Upper Mori Trail 3) Milagra should be off-leash, voice control everywhere There is no justification presented in the DEIS to justify the restrictions proposed to off-leash in San Mateo.

In addition, the DEIS talks about preserving the natural soundscape at GGNRA sites, referring to bird calls, and the sound of waves. However, any discussion of soundscapes should be realistic, not an idealized version of what a soundscape in an isolated wilderness sounds like. For example, the soundscape at Fort Funston routinely and frequently includes: the sounds of jet airplanes that are climbing from taking off at SFO airport and are still

rather low when flying over Fort Funston; the sounds of Coast Guard, traffic, and private helicopters; motorcycles and police/fire/ambulance sirens on Skyline Blvd; frequent volleys of gun shots from the shooting range at Lake Merced. Assuming you can only hear the waves and birds at Fort Funston is pollyanna. As a result of all these unnatural sounds, the occasional dog bark is no major problem and preserving soundscapes cannot be used to justify restricting dogs anywhere at Fort Funston, nor anywhere else in the GGNRA.

There are not enough trails available for off-leash recreation in the Preferred Alternative. There must be more. Not everyone who goes to the GGNRA plays fetch with their dog. Many people enjoy hiking on trails with their dogs as their companions. The Preferred Alternative is not "balanced." The 1979 Pet Policy allowed dogs off-leash on less than 1% of GGNRA land. Given recent additions of large tracts of land in San Mateo County to the GGNRA, this number is now significantly less than 1%. Off-leash dog walking started from a position of great imbalance. One-third of San Francisco households have dogs, yet they currently can recreate with their dogs on this less than 1% of GGNRA land. The Preferred Alternative allows off-leash on even less, including no off-leash in San Mateo County. How is that balanced? By denying the possibility of off-leash on any new lands that come into the GGNRA in the future, the Preferred Alternative will ensure there is no balance between recreation and protection of natural resources in the future. The Preferred Alternative cannot be accepted. The DEIS should instead choose the 1979 Pet Policy (including the plover areas at Ocean Beach and Crissy Field because the DEIS provides no evidence that off-leash dogs in these places have any impact on the plovers), plus off-leash in San Mateo and on new lands.

The Preferred Alternative is based on a philosophy of separation and exclusion. It denies that different park users can co-exist. Rather than share space between different park users, the Preferred Alternative carves up park space into separate areas for different park users. This basic philosophy is the exact opposite of the way we approach problems in San Francisco. It flies in the face of the unique social qualities of San Francisco. The GGNRA needs to develop a new Alternative that will better reflect San Francisco values such as co-existence, shared space, collaboration, and education to address problems should they occur.

The Preferred Alternative discourages cooperation between different park users and will increase conflict between park users, as more and more people and dogs are crammed into smaller and smaller spaces. Park user groups can work together to resolve problems, when they come up. For example, Fort Funston Dog Walkers, SFDOG and the hang glider group Feathered Flyers of Fort Funston collaborated on a series of signs to warn dog owners to keep their dogs out of the hang glider take-off area. If the

Preferred Alternative is accepted, and especially if the Compliance-Based Management Strategy is adopted, there will be no incentive for dog groups to work with other park users. And that will not be good for anybody.

The DEIS holds dog owners to a standard of behavior that is impossibly high, and significantly higher than any other park users. For example, studies by GGNRA staff routinely show people without dogs "disturb" plovers, but there is no attempt to restrict people without dogs from the beaches where plovers are. This basic unfairness cannot be allowed to continue and any Alternative that assumes this unfairness cannot be accepted.

The DEIS does not adequately address dispersion issues. It does not address the environmental and social impact of forcing large numbers of people and dogs into much smaller areas. Reducing the amount of area available for off-leash will significantly degrade the park experience for people with dogs. This is not addressed in the DEIS.

In 2002, a panel of senior National Park Service officials concluded, in part, "[T]hat off-leash dog walking in GGNRA may be appropriate in selected locations where resource impacts can be adequately mitigated and public safety incidents, and public use conflicts can be appropriately managed." Adequate mitigations and management tools already exist -- target people whose dogs misbehave, or bother birds, or jump on people, but leave the vast majority of responsible dog owners free to recreate off-leash with their dogs on the less than 1% of GGNRA land on which they've been allowed off-leash for decades.

The GGNRA does NOT have to be managed in exactly the same way as pristine wilderness areas such as Yellowstone or Yosemite. Dogs are allowed off-leash to hunt and kill wildlife in national preserves and other units administered by the NPS. Surely if it's okay for a dog to be off-leash to chase, corner and kill a wild animal, it should be okay for a dog in the GGNRA to be off-leash to play with people and other dogs. The GGNRA is located in the densely populated San Francisco Bay Area. It is in a major urban area. Much of the land was highly modified by the military when they controlled the land before the GGNRA was created. There are missile silos, and artillery batteries throughout the GGNRA. The military planted huge amounts of iceplant to stabilize the sand dunes at Fort Funston and elsewhere. That iceplant has been there for nearly 50 years or more. Standards of management that treat much of the GGNRA, especially those parts in San Francisco, like pristine wilderness are misguided. During the 2/17/07 Negotiated Rulemaking meeting, Barbara Goodyear, the Field Solicitor for the NPS, made it clear that while all parks are managed to the same level (conservation of resources), there is flexibility in how that is done from park to park. She cited, as an example, the fact that you don't

manage Yosemite Valley with the expectation that people will have a solitary wilderness experience there. You manage it with the knowledge that people will bump into one another there. The GGNRA, an urban park located in and immediately adjacent to a major city, does not have to be managed in the same way as Yellowstone or Glacier National Parks.

The level of enforcement required by the Preferred Alternative is excessive and unsustainable. Targeting people walking their dogs irresponsibly and leaving responsible dog walkers alone would be a much more efficient use of GGNRA resources. The DEIS states that it will cost more than \$1 million to implement the Preferred Alternative through the hiring of more Park Rangers and Park Police. In an era of shrinking federal budgets, this seems a poor use of scarce financial resources. Existing Park Rangers could easily enforce existing rules such as picking up pet litter or no chasing of birds. These enforcement actions are all that are needed to ensure responsible dog walking with minimal impact on natural resources and other park visitors from off-leash dogs.

The NPS must arrange for an independent entity to evaluate the public comment on the DEIS. Assigning the comments to GGNRA staff, the very people whose research is being attacked by these comments, is a conflict of interest of the most egregious kind. There must be independent analysis of the public comments and an independent determination of how the analysis of any Alternatives must be changed to accommodate the comments.

The DEIS is fatally flawed. It must be thrown out and started over, with an impartial, science-based analysis of impacts and alternatives, with baseline conditions (quantified and studied) and site-specific information on observed impacts leading the analysis.

I have been walking in the GGNRA for 20 years or so with either my own or friends' dogs. I am an environmentalist who sees no conflict between off-leash dogs and resource protection. I have been a member of the Sierra Club since 1972 and I am appalled at the local chapters irrational stand against dogs in the GGNRA. The local chapter does NOT speak for me or for most of its members. I have been members of or supported environmental and wildlife groups for decades, including the World Wildlife Fund, Nature Conservancy, Environmental Defense Fund, Natural Resources Defense Council, Marine Mammal Center, National Wildlife Federation, and many others.

--end

Correspondence ID: 4103 **Project:** 11759 **Document:** 38106
Received: May,30,2011 20:56:55

Correspondence Web Form

Type:

Correspondence: I am a native San Franciscan who has owned dogs her whole life. I walked them at Crissy Field before it was improved. I walk my lab with my son each morning,rain or shine at Crissy Field or Fort Funston. While our off area has been restricted greatly-the dog owners monitor ,pass out bags ,entertain tourists and are a responsible and eclectic group. I find Crissy Field and Ft. Funston to be a very diverse crowd .People come from all over town and beyond for the beauty and freedom.I implore the powers that be to leave well enough alone.Upon looking through the 2000+ page report-I saw no evidence to implicate responsible dogs and their owners.Let us be-this is my yard. By the way we are a diverse family-gay and hispanic.

Correspondence ID: 4104 **Project:** 11759 **Document:** 38106

Received: May,30,2011 20:58:16

Correspondence Web Form

Type:

Correspondence: I have put off commenting for months now because I find the whole situation so frustrating, but I will attempt to keep it short and sweet. My children and I attended the informational meeting at Tamalpais High School and the rangers said I should keep the comments "practical," so that is how I shall start:

I live in Marin County and our yards (if you aren't the few who live in Ross or Tiburon) are very small but we are surrounded by gorgeous open space. Unfortunately, the majority of this open space, for example Baltimore Canyon, Ring Mountain and most of Mt. Tamalpais, is on-leash only or no dogs at all. So instead of leaving my house and walking up Ring Mountain, I have to get in my car and drive to Oakwood Valley Trail or Muir Beach or even Crissy Field to get some quality off-leash time. The off-leash hike or walk is as much for me and my sense of peace as it is for my well-behaved and friendly lab mix. Not to mention excellent exercise! Those days at the beach and on the trails are the days that I am happy and proud to be living in the Bay Area -- paying ridiculous prices for everything from milk to houses to enjoy the outdoors year round. There is nothing like watching one's children running and playing freely with one's dog. It's natural and beautiful and should not be treated as wrong and punishable by fine.

Need to protect the Snowy Plover? Absolutely, let's protect the Snowy Plover. I have no problem with the GGNRA designating some beach space as leash-only to protect the nesting sites IF it swaps in some other land, an EQUAL amount of land, as newly off-leash. The total amount of land within the GGNRA that is off-leash should remain the same, but perhaps just different areas and trails are opened up to off-leash use. These new areas

and trails should be made known to the community.

Too many dog walkers not picking up poop and watching their charges? Require a permit or a license. If people want to use the public land to make a private dollar, I am in agreement with the GGNRA requiring the purchase of a permit or license to walk more than three dogs. It may deter some dog walkers for using the space and the annual fee is a nice revenue stream in a tough time (it may even off-set the cost of printing up the 2,000 page document multiple times!) As for not picking up poop, my family and I pick up lots of garbage daily that has nothing to do with dog-walking. Plus we participate in the Coastal Clean-up and Earth Day Clean-up annually.

Some people just don't like dogs off leash? Too bad. I don't like cats off leash in my neighborhood, pooping in my yard and making my dog crazy, but I just shrug it off. Live and let live. Besides, there is PLENTY of hiking space where no dogs are allowed at all or dogs must be on leash. I would hate to think that all of this fuss is because of some whining adults. I don't reward whining in my children and I hope the GGNRA doesn't reward it in adults. I understand that dog owners are in the minority, but from what I understand of our country, the minority enjoys the same equal rights as the majority. Moreover, to RESTRICT one's rights is a big deal and not to be taken lightly.

Here is the non-practical part of my comment: Isn't this the part of the country where we embrace differences in lifestyles and differences in interests? Aren't the eccentricities of the people of the Bay Area the things that make us so special? We live in an area made up of gorgeous land with beautiful weather, incredible food and delicious wine. We live in an area made up of creative and intelligent people from all backgrounds who choose to live freely and without judgement. We live in an area where one can jog across town naked and drunk, but soon, I fear, my husband and I won't be able to play on the beach with our children and off-leash dog. Yes, the whole situation is so frustrating.

Correspondence ID: 4105 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing as a concerned citizen regarding the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area. I use and enjoy the GGNRA lands and am concerned about impacts from dog-related recreation on the wildlife, habitats and other park users at the park. I strongly encourage you to improve the plan by implementing the following steps: 1. All "Regulated Off-leash Areas" should be fenced, at least in areas where fences do not

pose risks to wildlife and habitats. Fences provide more security for all park users and create clearer boundaries so that dog owners are aware of how to comply with park rules. 2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance. 3. Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it. 4. At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs. 5. While dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations. Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measures to protect the National Park's valuable resources for everyone and for future generations. Thank you, Katrina Olds

Correspondence ID: 4106 **Project:** 11759 **Document:** 38106

Received: May,30,2011 21:04:32

Correspondence Type: Web Form

Correspondence: I've been taking my two (well-behaved) dogs to Fort Funston for nine years for off-leash runs. During that time, I've given birth to two children who consider FF to be their second home. As a family we have bonded with each other and with other similar-minded families. We even bring our 80-year-old neighbor every Tuesday because he loves to be around the unleashed dogs. It's a wonderful place that, if not for its off-leash access, we would not have had the privilege of knowing and appreciating. Please continue to allow families like ours to enjoy this special open space with our dogs off leash. It's a magical place--and if you're a parent who has ever tried to jog with a double stroller and two leashed dogs, you will really understand what kind of liberating magic I'm talking about. In the crowded world we call the Bay Area, I'm begging you to give families and dogs some breathing room when it comes to leash laws. Thank you for your time!

Correspondence ID: 4107 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean,

The GGNRA's draft dog management plan is provably based on speculation, exaggeration and misleading (or totally erroneous) statements. It reaches conclusions unsupported by either science or the law. For these reasons, I strongly oppose this draft dog management plan in all its variations! When I first read about the plan(s), I was shocked at what appeared on the face of it to be deliberate misstatements of known facts (effects of dogs on the environment, for instance, or what the original intent of the land use was - another example). Then I attended several of the public meetings and it became clear that the GGNRA was simply trying to railroad these changes through for no reason other than a belief in the right to do so! How easy it is once the public fails to watch dog (no pun intended) governmental actions for decisions to be made based on blind prejudice or simple expedience.

The GGNRA can accommodate both recreation and conservation. And, in fact, it has successfully done so for decades! It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

All alternatives of the current plan disregard this original intent as well as the health and well-being of people, dogs, and the community. They arbitrarily exclude the Bay Area residents who exercise regularly with their canine companions. The alternatives all discriminate against all people with dogs, including tourists, seniors, families, the disabled and minorities.

NO version of the GGNRA draft management plan provides evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

1. Honor the original 1979 Pet Policy which respects dog-walking as legitimate recreation and exercise.
2. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. One percent of the whole is hardly taking the park areas over from other uses and certainly this percentage of space does not limit anyone who prefers to avoid dogs!!!
3. Exclude speculative, exaggerated, biased, or misleading statements and studies. (Which essentially destroys this outrageous, and outrageously expensive, report totally!)
4. Provide reasonable ways to address any significant adverse impacts from ALL recreational activities. Use objective standards applicable to other

recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, picnickers, etc.).

5. Enable professional dog walking and align any professional dog walking rules with county or city regulations. (This should include working with counties/cities to formulate reasonable licensure of dog walkers as well as limits on how many dogs can be walked simultaneously.)

6. Eliminate "compliance-based management" that allows implementation of additional restrictions without hearings. Such a system is open to arbitrary decision-making as it is designed to occur without review or public input and punishes those who are law abiding along with scofflaws.

As a senior citizen who has been enjoying the GGNRA lands with and without my dogs (and children and grandchildren) since 1977, I urge you to rethink this draconian, unreasonable, unsupportable plan and work with all of us who enjoy this area to ensure the lands we have been enjoying for decades remain open and available for all future generations to enjoy, too.

Sincerely,

Judith M Hedgpeth San Francisco, CA 94114-2662

cc: Senator Diane Feinstein Senator Barbara Boxer Minority Whip Nancy Pelosi Representative Jackie Speier Representative Lynn Woolsey Representative Anna Eshoo State Senator Mark Leno State Assemblyman Tom Ammiano SF County Supervisor Scott Wiener SF County Supervisor David Campos SF County Supervisor John Avalos SF County Supervisor David Chui SF County Supervisor Carmen Chu SF County Supervisor Malia Cohen SF County Supervisor Sean Elsbernd SF County Supervisor Mark Farrell SF County Supervisor Jane Kim SF County Supervisor Eric L. Mar SF County Supervisor Rose Mirakarimi

Correspondence ID: 4108 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I live in Pacifica CA and have been hiking with my dog in the GGNRA land around here for over 6 years. I hope to retire here in just a few years and make these hikes a daily event, as they are always the highlight of my day. Pacifica is a community with a lot of dogs. I am proud of the effort this community has gone to in order to preserve these open spaces so that they can continue to be enjoyed by hikers with and without dogs, as has been done here for generations. My main concern about the GGNRA dog management "preferred alternatives" is that it would BAN on-leash dog

hiking on most of these trails that we enjoy today. This will in fact ruin the lives of families with dogs that have lived here for decades, as well as people like myself who would like to retire in a dog friendly hiking area like we have now.

Here are my specific objections to the plan as it now exists:

1) It provides no proof, scientific or otherwise, that hiking with a dog on leash does any more harm to the environment than hiking with no dog. I hike with my dog on leash every week at Mori Point and Milagra Ridge. I see many on leash dog hikers like myself. The vast majority of us pick up after our dogs, and sometimes after others who are not so responsible. As a result I see more wild animal poop on these trails than dog poop.

2) It does not address the GGNRA's failure to enforce existing dog rules. There are no off-leash trails in these lands in Pacifica, but there are some who choose to ignore this. They are a minority of the dog hikers to be sure, but I do see them from time to time. And why is this? I can give a least 2 reasons. First, there are no legal alternatives for off-leash dog walking in Pacifica. None. The closest place is Fort Funston. Second, there is almost zero chance that they will be caught by a ranger. In my 6 years of dog hiking I have seen a ranger on only 3 occasions. This is a clear failure on the part of the GGNRA, and banning ALL dogs because of your failure to enforce the rules is just plain unfair to responsible on-leash dog hikers.

3) It does not provide any alternative trails for hiking with dogs, nor does it show what impact banning trails to dogs will have on other non-GGNRA lands in Pacifica or nearby. I suspect that Linda Mar Beach will become overrun with dogs, and how long will it be before dogs are banned there as well? Thus, your "preferred alternative" can have the result of creating new dog problems that did not exist before. And for what? My experience is that there is only very minor dog problems on these trails today. Your attempt to "fix" a minor problem can result in major problems down the road. Have you studied this? I did not see it in your report.

The GGNRA's current preferred alternative will significantly restrict and eliminate ON-leash dog hiking in many areas within the GGNRA. I object to this and consider it an overreaction to a minor problem that could be easily fixed with less drastic action. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site- specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural

resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration.

Sincerely,

Rick Rees

Pacifica, CA 94044

Correspondence ID: 4109 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30, 2011 Frank Dean, General Superintendent GGNRA Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

The proposed changes to policy for the Golden Gate National Recreation Area has prompted me to write. In the sixteen years that I have lived in San

Francisco I have never been so concerned for the state of our local recreational spaces. As a homeowner who is active in my local park, serving as a steward of Friends of Noe Valley Recreation Center and chairman of Friends of Upper Noe Dog Owners Group, I feel it is my responsibility to speak up on behalf of my local community. As a longtime member of the Natural Resources Defense Council, it my duty to speak up in defense of our national recreation area. As a dog owner, it is imperative that I speak up on behalf of my family, who often find respite from busy city and excercise at Ocean Beach, Crissy Field and Fort Funston.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. In particular, the idea that dogs should be banned at Ocean Beach south of Sloat is beyond understanding. This is the area we visit the most often for the very reason that it has few visitors down on the beach, almost never any shorebirds and absolutely no nesting habitat for birds or small mammals -the parking lot crumbles directly onto the the high tide mark. What possible harm could dogs do in this location? The beach is swept clean twice a day by the tide! In addition, this location is hazardous for swimming because of the surf, the rocks and the lack of safety personnel. Only on the hottest of days does a crowd appear. Even so, in all the many years that we have gone to any of the local beaches as a family, we have never witnessed any altercations between dogs or between humans and dogs, or an attack on birds. And, while the Ocean Beach area directly north of Sloat has seasonal restrictions there is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers.

The GGNRA must consider reasonable and balanced alternatives for dog walking on our public lands. Dog-walking is a recreational activity for people. However, dogs are faster than humans and need space to run free. Other alternatives need to be considered first before restricting access to beaches. We need an approach where recreational use, including dog-walking access, is balanced with preservation. The status quo effectively does that. Improvements in education, signage and barriers is far preferable to restriction as a first choice. And, face it, probably far less expensive than enforcement personnel. It is imperative that the DEIS include such an alternatives as a reasonable option. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. I totally support efforts to keep our wild spaces wild, but San Francisco is not pristine habitat and cannot be made so. The fundamental purpose of creating the GGNRA was to provide open space for recreation that includes dog walking as a form of recreation for residents of the Bay Area.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based on any documented impacts of non-compliance, just the mere fact that non-compliance occurs. Because it will change the status of areas from off- to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur. That violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be. It must be removed.

NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. The physical and monetary impact on our county parks needs to be addressed.

I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written, and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Sincerely,

Christopher Faust San Francisco, CA 94131

Correspondence ID: 4110 **Project:** 11759 **Document:** 38106

Received: May,30,2011 21:11:24

Correspondence Type: Web Form

Correspondence: I am a San Francisco resident and daily off-leash dog walker at Ft. Funston or Crissy Field. As a child I played with our dogs on the sand dunes at Funston. We had secret forts and playhouses in the trees. Now as I walk past the fallen fences or barriers I wonder what is the point of keeping kids and dogs from this natural playground. A shrinking population of snowy plovers is sad. Keeping dogs and taxpaying residents from off-leash recreation in a recreation area is sadder. My dogs have never been interested in birds unless made of latex. This is a free way for many to exercise and admire the scenery and flora. I have seen our accessible area shrink constantly and I have little faith that the common good is being served. My mother's favorite walk on the Sunset Trail at Funston, was eliminated as it was not kept walkable and now is barely a path. I would remind the GGNRA this is an URBAN park-not a shrine. Let it be used as it was intended in the transfer during the 70's-a place to recreate. People from all walks of life enjoy these areas with their dogs. Exercised dogs are responsibly cared for dogs. Let the restrictions stop!

Correspondence ID: 4111 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 21:20:58

Correspondence Type: Web Form

Type:

Correspondence: Dear GGNRA,

I am writing to enthusiastically support leash restrictions on Alta Trail from Marin City to Oakwood Valley Trail.

As someone who lives near the entrance to Alta, my family and I are always surrounded by dogs off-leash as we try to walk or jog along the trail.

The trail is often used by 'professional' dog-walkers, who take many off-leash dogs of various sizes on the trail, without any voice control. Many of these dogs are intimidating types of dogs.

I was recently bitten on the thigh while jogging near the entrance to Alta Trail by an off-leash dog, and to this day, I am nervous around any dog-large or small.

It has gotten to the point where my wife will not walk on the trail by herself, even armed with pepper spray. And our 9-year-old boy, who actually likes dogs, will not leave my side while walking the trails.

One of our concerns is that from the end of Donahue to the trailhead, there seems to be no rules at all about off-leash dogs, even though it is "private" land. We would like to encourage more enforcement of the leash laws on the trail from the parking area to the trailhead.

Thank you for your help. Sincerely,

David Swope Jennifer Diessel Ethan Swope

Sausalito, CA 94965

Correspondence ID: 4112 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 21:21:59

Correspondence Type: Web Form

Type:

Correspondence: I walk my dog every day at Crissy Field or Fort Funston. My infant son accompanies us. We are members of the Sierra Club, Wilderness Society and Greenbelt Alliance. We love the outdoors, the beach and fresh air. I have lived here my whole life and am dismayed at the restrictions and reduction

of usable space at these two sites. Off leash dogs are a happy part of my life and my family's. My young nieces and nephews are delighted when they accompany us on our walks as they do not have pets. Explaining the park's plan to further restrict dogs confounded the kids this weekend. If it weren't for coming to off-leash areas they would not be socialized to dogs, being city kids. Given our climate-it is mostly just the dog owners out walking at the beach on our stormy and foggy days. No more restrictions!

Correspondence ID: 4113 **Project:** 11759 **Document:** 38106

Received: May,30,2011 21:22:00

Correspondence Type: Web Form

Correspondence: I support the preferred alternative in general. My only comment would be that any area that is off leash needs to have clear signs that it is off leash and should be separated off from other space with a fence or other clear barrier.

Correspondence ID: 4114 **Project:** 11759 **Document:** 38106

Received: May,30,2011 21:24:59

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

This letter is in regards to the GGNRA dog management "preferred alternatives". As a responsible dog owner and on-leash proponent, I was shocked to learn that the "preferred alternatives" to GGNRA land would drastically limit on leash dog access.

Personally, our dog is part of our family and banning us from enjoying our tax paid rights, not only makes me angry but makes me want to move. I was just visiting Orange County, California and in particular, Laguna Beach. They are a very dog friendly community with hiking trails and beach access for on leash dogs.

Statistically in San Francisco, there are more dogs than children. (SF Animal Care and Control dog numbers from 2010-120,000 dogs versus US Census 2009-114,000 children.) Since our tax dollars pay for your

management, you must consider your constituency.

With regards to the Environmental impact, please consider that all lands in the SF Bay Area cannot be managed like the enormous and secluded lands of National Parks, ie. Yosemite. Otherwise, wildlife such as bears and mountain lions should be able to roam freely into our cities without consequence. Our urban park lands are different and need to be managed differently.

I believe the following needs to be addressed and made public:

-Thorough scientific evidence that On leash dogs disturb wildlife and the environment more than people.

-A proposal to strictly enforce on leash dogs and heavily fine off leash dog owners. These funds could be used to create an off-leash dog area or help mitigate the tax shortfall of Park lands in California.

Please do not ban on leash dogs.

Thank you, Lorrie Pendleton Pacifica, California

Correspondence ID: 4115 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:26:15
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean:

My best friend died suddenly this week, and I am writing on his behalf, too, because this issue is so important. He loved seeing the dogs frolic on Crissy Field beach and went with me several times to Fort Funston. I don't agree with the GGNRA's draft dog proposal. It strikes me as a solution in search of a problem. What prompted the commission of the EIR?

GGNRA is supposed to be for all of us to enjoy. Almost 40% of all households own at least one dog, and almost 70% of all homeowners own at least one dog.* It is disingenuous to make it is dogs vs. people or dogs vs. birds. This is about people who wants to enjoy the parkland and beaches we pay a lot of money to support and exercise our dog at the same time. A dog doesn't care where he is, just who he's with. So this is about me, the human. Dogs off-leash are more comfortable for me because my hands are free. I've got a bit of arthritis in my hands now, so holding onto a leash for a long time is hard. Dogs are easier to handle, surprisingly, because they are friendlier towards other dogs they run into. They get more exercise without us to slow

them down.

I have lived in Marin since 1960. My father was instrumental in conceiving of and obtaining the first railroad rightaway for the bicycle paths, he was on the first BCDC (with Senator Feinstein), and is currently on the board of Audubon. I explain this to show our family has always had strong environmental appreciation/preservation beliefs.

I asked my dad how he thought dogs could harm the environment differently than other animals to warrant a special ban. He couldn't think of anything! We talked about ground-nesting birds, yet raccoons, coyotes, and humans are just as dangerous-more so for the first two-to the birds. All of the animals poop; only the dogs' are picked up and removed. The birds don't appear to be scared of or by dogs. If you ever watch a dog swimming or running towards one, they wait until the last minute before moving, and then only move a short distance away. The birds appear as if they're teasing the dogs, frankly.

Of all the animals allowed on GGNRA land-mountain lions, deer, raccoons, coyotes, rabbits, snakes, wild boar-will any of them: - Sacrifice their life to protect a human? - Help soldiers during wartime? - Help the Navy Seals capture Osama bin Laden? - Lead the blind? - "Hear" for the deaf? - Assist the physically disabled? - Capture criminals? - Stay with a toddler overnight until help comes rather than run home? - Jump through a car window, then lean back in to pull the baby out of a burning car rather than just run away? - love unconditionally, caring not whether I am rich, poor, fat, thin, pretty or plain, have a big house, or a fancy car?

No. So why are dogs the one species GGNRA wants to ban?!! There's no scientific evidence for this proposal.

Danger? No dog is born dangerous to humans; they can only be trained or mistreated into being so. It's extraordinarily rare when compared to the danger of humans to each other. I would never dream of going out on a hillside trail alone without my dog because I'd worry about the male humans hurting me, not a dog. Statistically, the odds are phenomenally greater that another person, not a dog, hurts a person. I'll never forget the Trailside Killer in Marin.

I cannot speak to all the areas encompassed by this proposal, only Crissy Field and Fort Funston. They both have separate areas already. Crissy Field has a long paved walkway for people to go on where dogs are on leash. I very rarely see people without dogs on the beach unless they're going out on the water to windsurf. It is usually very windy and cold there by the waterfront.

At Funston, the area is somewhat dangerous because of the cliffs; the beach is very hard and steep to get to and virtually deserted. The parasailers take off in a different area. Literally, everyone on the "dog side" is there with a dog. We have an entire coastline of beach access that is far easier to use where "dogless" folks go. The reason people started using Funston with their dogs is because it was deserted and rather undesirable as beaches go.

Please look into this for us and stop more regulations/rules being imposed on us. Thank you.

*as of 2009, per Humane Society of the United States.

Correspondence ID: 4116 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:26:50
Correspondence Type: Web Form
Correspondence: [Please note that this is an electronic submission of a letter postmarked 5/28/11 mailed to Sup. Dean regarding the plan with the official comments of the Golden Gate Audubon Society. This will be submitted in two sections because the comments exceed the 10,000 word limit]

Dear Superintendent Dean:

Thank you for the opportunity to submit comments to the Draft Dog Management Plan / Environmental Impact Statement ("Draft Plan" and "DEIS", respectively) released on January 14, 2011. These comments are submitted by the Golden Gate Audubon Society ("GGAS") on behalf of its approximately 10,000 members and supporters in the San Francisco Bay Area who use and enjoy the Golden Gate National Recreation Area ("GGNRA") and are concerned about the continuing impacts of dog-related recreation on the natural and historical resources of the park.

There is no doubt that the National Park Service ("NPS") must enact new regulations to manage dogs and dog-related recreation in the GGNRA. All national parks are national treasures, intended to be used and enjoyed by all visitors, but only to the extent that their natural and cultural values are not permanently impaired. (NPS Organic Act) The GGNRA is a particular treasure, given that it is was created to serve urban residents, many of whom lack the opportunity to travel to more "wild" areas like Yosemite or Yellowstone. Moreover, the GGNRA is home to more endangered species than Yosemite, Sequoia, Death Valley and Kings Canyon National Parks combined, and one of the highest concentrations of sensitive species in the U.S. NPS has attempted to implement the 1979 Pet Policy with education, signage and enforcement, but its efforts have failed. Non-compliance with existing regulations is extremely high and the number of park users,

including those bringing dogs, is growing, resulting in greater impacts and more conflicts. The 1979 Pet Policy is both unsustainable and illegal.

Under the Preferred Alternative, the Draft Plan constitutes the largest accommodation of dogs into any national park in the country. This will undoubtedly result in significant, long term impacts on park resources and other park users. Indeed, 36 C.F.R. ' 7.97, which prohibits unleashed dogs in National Parks and restricts leashed dogs to only a few paved areas, was created because NPS recognized that dogs pose risks to park resources, visitors and employees. The wisdom behind 36 C.F.R. ' 7.97 has been supported again and again by an abundance of scientific studies and incident reports, which demonstrate that insufficient dog management in natural areas results in significant negative impacts on the wildlife, plants, and habitats, ,5 a diminished the park experience for other park users and risks for park employees, and the exposure to risks of attacks and other hazards for dogs.

GGAS is sensitive to the needs and concerns of dog owners and believes that effective dog management can be implemented in the GGNRA without impinging on the socialization or health of dogs in the Bay Area. We are also aware that many dog owners are responsible guardians and that they keep their dogs on leashes when required and pick up after them. Given that the City of San Francisco has more off-leash dog recreation areas than any other city in the United States and given that the GGNRA will continue to welcome dogs into large tracts of its land in San Francisco, we are confident that responsible dog owners will have ample opportunities to recreate with, exercise and socialize their dogs.

GGAS appreciates the effort put into the documents by the National Park Service staff and members of the community that participated in the negotiated rulemaking effort. While we continue to have substantive concerns about the Draft Plan and the DEIS, we believe the document represents a significant step in the right direction to protect the GGNRA's resources for perpetuity.

Our comments begin by addressing overarching concerns with the Draft Plan and DEIS, including:

- 1) All regulated off-leash areas ("ROLA") must be enclosed. If enclosures are inappropriate in a given area due to biological, cultural, aesthetic or physical limitations in an areas, then it should not be designated as a ROLA;
- 2) The GGNRA should provide more opportunities for visitors to hike in the GGNRA in San Francisco without interacting with dogs. Currently, the Preferred Alternative provides for only a single trail where visitors, including those with small children, may go without being forced to interact with dogs. This is not fair to community members that have a right to enjoy

the park without fear or discomfort due to the presence of dogs. 3) The Park Service should not permit commercial dog walking within the GGNRA. The Park Service may only permit commercial activities that further the park visitors' experiences. Commercial dog walking does not further any person's park experience. 4) The 75% compliance-based management threshold is too low. The very low threshold for compliance, essentially, a "C" grade, perpetuates the culture of non-compliance that has persisted in the GGNRA and resulted in the current and ongoing impacts to the park resources and visitors. Dog owners are more likely to comply with new regulations if a culture of compliance is developed by requiring a higher level of compliance. Moreover, allowing at least 25% non-compliance will result in continued negative impacts to park resources. 5) The DEIS fails to establish that "voice control" is a valid method of controlling off-leash dogs. As demonstrated in the Criminal Incident Reports produced by the Park Service's rangers, dogs that are ostensibly under "voice control" do not respond accordingly. GGAS is unconvinced that this is a valid means for protecting park users, wildlife, habitats and other dogs. [picture omitted]

Our comments next address the Preferred Alternative and potential variants in San Francisco County. In general, we endorse Alternative D, which is the most environmentally-protective alternative, with the caveat that all ROLAs should be fully enclosed. We have deviated from Alternative D for specific areas in San Francisco where we believe dog-related recreation may be less harmful to the park experience and resources in the hope that a reasonable compromise may develop in the final plan.

While many of our general concerns reach to the Draft Plan as proposed for the whole park, we have restricted our site-specific comments to areas in San Francisco. While our members have concerns about the alternatives and their elements in Marin and San Mateo Counties, we defer to the Marin Audubon Society and the Sequoia Audubon Society, respectively, based on their local expertise and representation of local community members. We join in and support the comments submitted by both groups, as well as comments provided by the San Francisco Bay chapter of the Sierra Club, Nature in the City, the California Native Plant Society, and the Wild Equity Institute.

I. GENERAL CONCERNS

A. The DEIS Should Better Document the Impacts Dogs Have on Native Wildlife, Plants, and Habitats and on Other Park Users.

While the DEIS clearly states that dogs have negative impacts on native wildlife, plants, habitats and on other park users, the Park Service failed to include an adequate and comprehensive reflection of the overwhelming body of evidence demonstrating these impacts.^{1,2,3,5} Frankly, had the Park

Service included a more comprehensive review of the reports and studies documenting the effects of dogs on biological resources, some of the speculation, rumors, and misinformation that arose regarding the DEIS could have been avoided. Perhaps more importantly, local elected officials would have had a better understanding of the need for effective dog management in the GGNRA to protect local citizens, and natural values and better decisions regarding support or opposition for the plan could have been made.

To remedy this deficiency in the DEIS, the Park Service should revise the portions of the DEIS that discuss these impacts to better demonstrate the significant and overwhelming evidence on this point and include citations to all available reports, studies and data on the topic in a comprehensive bibliography. As currently written, the language appears to provide conclusions without support. Specifically, Chapter 1 of the DEIS includes sections on the "Impacts of Dogs on Natural and Cultural Resources in the Park" and "Visitor Use and Experience", but both sections are very sparsely supported by citations to relevant studies, including studies provided by the public during the scoping period. (See DEIS at pp. 13-20)

The DEIS would be greatly improved if the Park Service conducted a year-by-year review of all reports of dogs interacting with wildlife, including all Criminal Incident Reports produced by Park Service rangers. The very brief review provided on page 19 of the DEIS is insufficient given the long history of noncompliance and other problems related to accommodating dogs in the GGNRA. A review of Criminal Incident Records for 2008 reveals almost 900 pages of reports of incidences involving dogs in the GGNRA, many of which involve (1) dogs chasing and harassing wildlife,¹ (2) dogs chasing and harassing park visitors and users,² and (3) dogs attacking and injuring other dogs.³

The DEIS would also be greatly improved if it provided a better explanation of why some park users are uncomfortable around dogs and clearly established that all park users have a right to use the park without fear of attack or harassment from other park visitors, including dogs or dog owners. The public discourse regarding the proposed Dog Management Plan has suffered because the DEIS does not reflect the reality that (1) dogs do attack and harass park visitors on a regular basis and (2) that some park users are justifiably concerned about unwanted interactions with dogs. Many parents of small children, community members with disabilities, and the elderly are all groups that are justifiably concerned about unwanted interactions with dogs. Concern for these user groups has largely been ignored in the public discussion of this issue.

B. All Regulated Off-leash Areas Must Be Enclosed. The Preferred Alternative of the DEIS proposed five "Regulated Off-leash Areas"

("ROLAs") in the GGNRA in San Francisco. Any ROLAs that are established must be fully enclosed. GGAS urges the Park Service to adopt a philosophy of enclosing practices that pose risks to the national park, rather than fencing off the other resources of the park, as if it were a zoo rather than a National Park.

Even the off-leash advocacy group SFDOG has endorsed the creation of barriers to "prevent potential conflicts between dogs, vehicles, organized sporting events, and other park users. Barriers must also be present to protect dogs from steep cliffs or other natural hazards." (Ewing, John. 1999. Managing Off-leash Recreation in Urban Parks. SFDOG. Available at http://www.sfdog.org/do/olrm_scan.pdf). Indeed, the establishment of an enclosed ROLA was the only productive outcome of the Negotiated Rulemaking effort. GGAS cannot understand why the Park Service elected to ignore the only point of consensus to come out of the Negotiated Rulemaking process in choosing to not enclose ROLAs.

A lack of fencing or physical containment will diminish the ability to achieve compliance with the leash rule in the surrounding areas without considerable oversight from law enforcement. Currently, there is a great deal of confusion over where dog owners may take their dogs either on- or off-leash within the GGNRA. By failure to clearly demarcate where off-leash activity will be allowed, the GGNRA will perpetuate some of that confusion resulting in the need for continuous education and enforcement efforts.

Fencing or similar physical containment will definitively delineate the ROLA boundaries and effectively eliminate the potential for off-leash dogs to conflict with park visitors and wildlife. The borders of the ROLAs must be clearly defined in a manner that will easily communicate the boundary lines to all park visitors. Well defined off-leash areas provide dog owners with greater certainty as to where on- and off-leash dog activities are appropriate. Moreover, visitors to the GGNRA should have a choice whether or not to interact with off-leash dogs. Many visitors who would prefer not to interact with dogs at all in a national park are, for the most part, forced to accept that inevitability, even under the Preferred Alternative. However, because of the wide range of problems that arise with off-leash dog activity, including unwanted advances by dogs and, possibly, threats or attacks, visitors should be given the option to "opt-out" of interacting with off-leash dogs. A fenced boundary would give all visitors ample notice before entering an off-leash area. It appears that the Park Service rejected requiring enclosures because of concerns regarding impacts to biological or aesthetic resources. However, the DEIS is woefully incomplete in its analysis of the kinds of enclosures that could be used to establish ROLAs. Fences need not be large or impermeable structures. For example, a "post-and-cable" fence would provide a well-defined boundary for dog owners

and other park visitors without creating a barrier that results in impacts to biological resources or aesthetic values. Other, more creative options are available, such as vegetation-based barriers that create habitat, keep with the park's natural aesthetic, and provide the clear boundaries that provide for a safer, better regulated park.

An area should only be considered as a possible ROLA if it can be fully enclosed or otherwise made physically distinct from other portions of the park. If it cannot be enclosed, the area should be considered for another alternative use (on-leash only or no-dog). The Park Service is under no requirement to provide ROLAs. Moreover, dog owners in San Francisco have again and again demonstrated an unwillingness to comply with rules in areas that were not well-defined. Enclosures are necessary to provide dog owners with sufficient warning about where on- and off-leash recreation is appropriate and to provide other park visitors with the assurances and safety they deserve when visiting a park.

GGAS provides more specific comments regarding ROLAs proposed in San Francisco in Section III below. C. The GGNRA Should Not Permit Dog Walkers to Have More than Three Dogs per Person and Commercial Dog-walking Is Not an Appropriate Activity in the GGNRA.

The DEIS indicates that commercial dog walking would be allowed under alternatives B, C and E. (DEIS, at 63) The allowance for commercial dog walking would come through a special permit allowing any person to bring up to six dogs into the park. First, we do not believe that allowing any person to bring more than three dogs into the park at one time is advisable, regardless of whether they are a commercial dog walker. In any event, it is our belief that commercial dog walking is currently not legal within the GGNRA and furthermore, does not meet the National Park Service criteria for permitting.

Currently, dog management guidelines for the GGNRA are set forth by the 1979 Pet Policy which the DEIS identifies as Alternative A. The 1979 policy provides guidelines for dogs to be within the GGNRA under the supervision of their owners and makes no reference to commercial dog walking. However, commercial dog walking within the GGNRA occurs on a daily basis, and though no permitting process has been established, it is tolerated by the Park Service. This commercial activity has significant negative impacts on the park and is in violation of 36 CFR ' 5.3 which stipulates that non-permitted commercial activity is prohibited on National Park lands.

[picture and caption omitted]

The DEIS states that the National Park Omnibus Management Act of 1998

provides guidance for the issuance of commercial use authorizations and concession contracts. (DEIS, at 39) Title IV Sec. 418 of this act specifies that authorization shall only be granted to commercial ventures that "provide services to visitors to units of the National Park System." Commercial dog walking services do not provide any services for park visitors. Their activities are more closely analogous to timber extraction or mining-essentially, a commercial venture profiting from using (and creating impacts on) park resources. Therefore, the activity does not qualify for authorization and should not be allowed under any alternatives of the DEIS.

GGAS understands that this is an extremely controversial position and that it may seem unfair to many commercial dog walkers that comply with leash requirements, pick up after their charges, and maintain control over their dogs at all times. However, we have seen commercial dog walkers again and again unload very large numbers of dogs at Ft. Funston and in other parts of the GGNRA and essentially letting the dogs roam uncontrolled. These activities seem only to be growing. Not only do these activities result in significant negative impacts on the park, they perpetuate the culture of non-compliance that leads other, more responsible dog owners to conclude that the regulations are not applicable, or at least enforced.

D. The Draft Plan Does Not Include Adequate Enforcement Mechanisms to Ensure Compliance with New Rules.

Even under the extremely lax 1979 Pet Policy, compliance with leash requirements in the GGNRA has been extremely poor. The failure of the Park Service to regulate its lands mirrors the "culture of non-compliance" that permeates in the City of San Francisco, where city officials have acknowledged that many dog owners fail to comply with leash and pet waste requirements.

Non-compliance with leash requirements is the status quo in the GGNRA, particularly at Ocean Beach and at Crissy Field. Volunteers monitored snowy plovers within the Crissy Field Wildlife Protection Area ("WPA") during the 2006/2007, 2007/2008, 2008/2009 and 2009/2010 snowy plover "wintering" seasons (July through March). In addition to counting all snowy plovers, observers recorded incidences of humans and dogs within the WPA and noted whether disturbances to the snowy plovers or other wildlife occurred.

During the 2006/2007 season, compliance with the leash requirement in the WPA was approximately 29%. During the 2007/2008 season, compliance fell to approximately 27%. Compliance improved to approximately 34% during the 2008/2009 and 2009/2010 seasons. Anecdotal evidence indicates that the non-compliance rate is even higher on Ocean Beach despite the significantly larger population of threatened snowy plovers and other

shorebirds that depend on the beach there.

[Data figure and caption omitted]

Golden Gate Audubon understands that NPS rangers have a wide range of responsibilities and that they are understaffed. However, by failing to police dog walkers within the GGNRA, NPS has contributed to the permanent impairment of the natural resources there. Moreover, it has created a sense of lawlessness and entitlement within the community that promotes even greater non-compliance.

The Draft Plan and DEIS would be greatly improved if it included more specific information about the extent of non-compliance in the GGNRA and in San Francisco. Data on non-compliance with leash (and other pet control) requirements in San Francisco is relevant to the analysis in the DEIS because it demonstrates the culture of non-compliance that exists in San Francisco.

Finally, compliance oversight should be required for as long as dogs are allowed within the GGNRA. We are concerned that the compliance oversight may be of limited duration and that once it is complete, non-compliance will likely escalate (especially if enforcement remains at historic levels). The compliance program should be considered as a cost of allowing dogs in the GGNRA in perpetuity.

Correspondence ID: 4117 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:28:50
Correspondence Type: Web Form
Correspondence: [This is the second of two submissions and contains pages 11-19 of the GGAS comment letter postmarked on 5/28/11].

E. The Draft Plan Fails to Provide Adequate Opportunities for Dog-free Recreation on Trails in San Francisco.

Under the Preferred Alternative, dogs will be allowed on-leash on all but one trail in the GGNRA in San Francisco. Therefore, visitors to the park who would prefer not to interact with dogs will be restricted to a single trail. In short, the Park Service's overly generous effort to accommodate dog owners means that other users must endure a large number of dogs throughout the GGNRA in San Francisco or simply not visit the park.

The DEIS does not include adequate consideration of users that are less likely to use the park or have their park experiences diminished because of the presence of dogs. GGAS believes that a better study of the impacts of

dogs on other park users and potential users would improve the Draft Plan and DEIS and should be conducted and incorporated before the FEIS is produced.

F. The DEIS Does Not Establish that "Voice Control" Is a Valid Method for Controlling Off-leash Dogs in the GGNRA.

Many of the Alternatives, including the Preferred Alternative, rely on "voice control" a means for controlling off-leash dogs. While the DEIS provides a somewhat broad definition of "voice control", it provides no basis or evidence that demonstrates that visitors to the park (or their dogs) have adequate training and discipline for "voice control" to work.

Again, a review of the Criminal Incident Records is informative on this topic. Several Criminal Incident Reports from 2008 demonstrate that again and again, dog owners who let their dog off-leash in the GGNRA cannot control their dogs merely by vocal commands.

Moreover, the DEIS and Draft Plan are fatally flawed by determining that a dog is under "voice control" merely because it comes when called by the owner under casual or non-emergency situations. True "voice control" would require that a dog responds to vocal controls when excited or under duress. For example, a dog would stop when commanded when chasing wildlife, charging a park visitor, or attacking a dog.

The only way to ensure that dog owners visiting the park have the ability to vocally command their dogs is to require permits prior to entering the park. Each dog owner would be required to pass a test ensuring that they can verbally control their dogs to prevent illegal harassment of wildlife, trampling of native plants, or assaults on other park visitors or dogs. In the absence of a license or permit system for dog owners, the Park Service has no way of ensuring that a real "voice control" system will be in place in the ROLAs. At a minimum, the Park Service must acknowledge the limitations of relying on voice control in the FEIS and final plan.

Finally, the lack of true voice control by most dog owners in the GGNRA bolsters the arguments that:

- 1) all ROLAs should be enclosed to reduce opportunities for uncontrolled dogs to interact with other park visitors and wildlife;
- 2) park visitors should be restricted to no more than 3 dogs per person because it is highly unlikely that even a well-trained dog walker can keep voice control over more than 3 dogs at a time; and
- 3) the 75% compliance requirement set by the Park Service is too low, because that means approximately 25% (or more) off-leash dogs not on voice control will be tolerated in the park, resulting in ongoing impacts to other park visitors, dogs (especially dogs on leash), and

wildlife.

G. The DEIS Fails to Address Impacts to Other National Parks as a Result of the Preferred Alternative. Through the Draft Plan and the Preferred Alternative, the National Park Service is proposing for the first time to accommodate dogs off-leash throughout large portions of a national park unit. The DEIS does not adequately address the impacts to other National Park units. As a conservation organization, Golden Gate Audubon sympathizes with the mission and values of the National Park Service particularly toward protection and preservation of natural resources. As such, we believe that the best protections for natural resources would be to have park rules that are consistent with those of the nationwide system of National Parks.

We are very concerned about the public perception of national park values and the beliefs and behaviors that park visitors will take with them to other units of the National Park System. In recent years, GGAS members have observed an increasing level of on-leash and off-leash dogs on (and off) the trails of other National Parks including Lassen Volcanic National Park and Yosemite National Park. We believe that lax policies of the GGNRA could be contributing to public misperception of the standard nationwide rules pertaining to pets in our National Parks. We also believe that the Park Service has public educational responsibilities to instill park values and proper behavioral practices into the public mindset.

The DEIS should address the public perceptions of National Park values and the potential impacts of the dog management alternatives to the rest of the National Park System.

H. The DEIS Does Not Adequately Explain How or Why the Park Service is Allowing the Continued "Take" of Endangered Species and Other Protected Species by Dog Owners without Permits.

The DEIS acknowledges that harassment of snowy plovers by people or their dogs constitutes a violation of the federal Endangered Species Act, 16 U.S.C. " 1361 et seq. (See DEIS at 1240 ("Chasing of plovers clearly meets the definition of harassment and take under the ESA of 1973")) The DEIS also acknowledges that harassment of wintering birds may have negative impacts on the overall population of the species and individual survivorship and fecundity. (Id., citing USFWS. 2007. Recovery Plan for the Pacific Coast Population of the Western Snowy Plover, at 65).

The Park Service is a federal agency with responsibility for stewardship over these threatened species and many other species covered by the Endangered Species Act, the Migratory Bird Treat Act, and other applicable laws on park lands. Yet, the Park Service has never explained the legal basis

for permitting the ongoing harassment and harm to the snowy plover at Crissy Field and Ocean Beach. Specifically, the DEIS does not explain how the Park Service can knowingly allow dog owners to persistently and perpetually "take" snowy plovers in the GGNRA through harassment.

For example, the DEIS lists several of the impacts that dogs have on snowy plovers. (DEIS at 1240). However, the DEIS never explains why these disturbances do not constitute a "take" of snowy plovers under the ESA. Nor does the DEIS explain why the Park Service can perpetuate these illegal takings through the new Dog Management Rule.

IV. SITE-SPECIFIC COMMENTS ON THE PREFERRED ALTERNATIVES FOR SITES WITHIN SAN FRANCISCO COUNTY.

Unless otherwise specified, GGAS endorses Alternative D for sites in San Francisco. We defer to comments provided by the Marin Audubon Society and the Sequoia Audubon Society for recommendations in Marin and San Mateo Counties, respectively. Site-specific recommendations for GGNRA areas in San Francisco are provided below.

A. Fort Mason

Golden Gate Audubon supports the Preferred Alternative (Alternative C). This will leave the vast majority of Ft. Mason open to the current on-leash use. We note, however, that while under the current rule Ft. Mason is supposed to be an on-leash dog area, it is effectively an off-leash area due to lack of enforcement.

B. Crissy Field

Crissy Field has been one of the most controversial areas for dog management. It is a very active spot for local visitors and tourists. It is also an important wildlife area, adjacent to the Bay, the Pacific Ocean, and some of the largest woodland and coastal scrub habitat remaining in San Francisco. The DEIS should include a statement that wildlife viewing is an important activity at Crissy Field and that it should be considered in any decision about how dogs will be accommodated. The Park Service must consider all these values-not just the demands of dog owners-in deciding how to regulate dogs in the area.

Except as discussed below, GGAS endorses Alternative D for Crissy Field. Specifically, GGAS believes that any ROLA established at Crissy Field must be fully enclosed (see Section I.B above).

1. The DEIS underestimates impacts to snowy plovers from the Preferred

Alternative.

The DEIS does not fully describe the significance of the existence of snowy plovers in the Crissy Field area. The following information should be considered:

1) The DEIS states that there is no record of snowy plovers nesting within the GGNRA. However, there are records of bird and egg specimens collected during nesting season. (See Grinnell, J. 1932 and Smithsonian Institution collection data).

2) The DEIS states that snowy plovers have consistently overwintered at Crissy Field since 2005. However, there are no data to suggest that snowy plovers have not been overwintering there prior to 2005.

3) The USFWS Recovery Plan for the Pacific Coast Population of the Western Snowy Plover has identified Crissy Field as an expansion site for snowy plovers. (USFWS (2007), at 43-44, 140-141)

4) The Snowy Plover has cultural significance at Crissy Field. The Presidio of San Francisco is the Type Locality of the Snowy Plover, collected by Lt. William Trowbridge (Army Corps of Engineers, U.S. Coastal Survey), on May 8, 1854 (Grinnell, 1932)

2. The DEIS should estimate impacts under the Preferred Alternative under a scenario where dog owners continue to fail to comply with regulations.

The DEIS' endorses the Preferred Alternative by concluding that it would have "minor adverse impacts" and "overall negligible impacts" assuming compliance with leash requirements. (DEIS, at 1244-1245) Crissy Field has suffered due to dog owners' unwillingness to comply with leash requirements, even in the Wildlife Protection Area (WPA). (See, e.g. DEIS at 1241 ("Despite education and enforcement efforts, compliance with the special regulation establishing the seasonal leash restriction remains extremely low")) The DEIS should at least consider the possibility (which history indicates is likely) that compliance with leash requirements will not be achieved.

Moreover, given that under the Preferred Alternative the WPA would be closed to dogs, the Park Service has no method for further protecting the site if dog owners refuse to comply with the regulations there. It is impractical to assume that park rangers will be able to patrol the WPA adequately to ensure full compliance with the new rules.

The Preferred Alternative would permit at least 25% of dog owners to continue to fail to comply with the new regulations. The DEIS does not

discuss whether this potentially large number of non-compliant dog owners and dogs will have significant negative impacts on the wildlife, habitat, and other visitors in the area.

2. The Crissy Field Wildlife Protection Area should be off-limits to dogs. GGAS endorses the Preferred Alternative to the extent that it would disallow dogs in the WPA at all times. We do, however, have concerns about the placement of the east boundary fence. The DEIS states that the east boundary fence will be relocated 200 feet eastward at a position 900 feet from the NOAA pier. (DEIS at 60) We believe that the determination of fence placement should have more flexible parameters and that careful consideration should be given to the visual penetration effect and to the geographical conditions of the immediate area. Under the preferred alternative, off-leash dog activity directly adjacent to the east boundary fence will pose a visual threat that will penetrate into the WPA, effectively rendering a portion of the eastern WPA as non-viable habitat during daytime use hours. Given this concern, the fence should be placed a reasonable distance eastward, beyond the actual 900 foot border line, to allow for an adequate buffer zone. Additionally, the geography of the area of fence placement is somewhat complicated by non-uniform conditions which include a variety of substrates, varying elevations, several lobes of fenced dune habitat areas, and a variety of pedestrian pathways. Consideration should be given to all of these conditions and fence placement should be such that it will accommodate ease of pedestrian traffic flow while maintaining adequate protection of the WPA.

3. GGAS endorses the Preferred Alternative for the Promenade (East Beach to the Warming Hut)

The paved trail along the promenade is an appropriate place for on-leash dog activities at Crissy Field. GGAS remains concerned about undesired human-dog interactions, especially for joggers and disabled visitors and those with small children, but believes that with proper education and enforcement of leash requirements, the area can successfully accommodate leashed dogs.

4. Any ROLA on the Airfield must be fully enclosed.

The Crissy Airfield, a mix of native and non-native plant species, is the largest expanse of grassland on GGNRA lands in San Francisco. The airfield is an important area for birds and other wildlife and is used by park visitors for its wildlife viewing opportunities. In recent years, observers have recorded more than forty species of birds using the field, including rare, vagrant species such as Cattle Egret, Red-throated Pipit and Lapland Longspur. The continued use of the Airfield as an off-leash area constitutes

an impairment to the natural resources in the area.

However GGAS understands that the Draft Plan and DEIS represents an attempt to balance the competing interests of many groups. Therefore, Golden Gate Audubon does not oppose the creation of a ROLA in the Airfield, but only if the ROLA is full enclosed. Moreover, any enclosure must allow for other park visitors to cross the Airfield without being forced to interact with dogs. We believe it is possible to design the ROLA to be enclosed with post-and-cable (or a similar apparatus to distinctively mark the area) that will not impair the biological or aesthetic value of the Airfield and be removable for special events.

5. GGAS opposes off-leash dog activities on the Central Beach and supports Alternative D to prohibit dogs.

GGAS opposes the Preferred Alternative, which could create a ROLA on Central Beach. All of the shoreline beaches at Crissy Field are suitable foraging and roosting habitat for Snowy Plovers and other shorebirds. The US Fish & Wildlife Service, in its Snowy Plover Recovery Plan (pp. 43/44), has identified Crissy Field as a potential expansion site for Snowy Plovers. (USFWS, Recovery Plan for the Western Snowy Plover, at 43-44). Given this anticipated increase in snowy plover population, using the Central Beach as a ROLA will create a high probability of future conflicting beach uses. There is no question that off-leash dogs have a substantial impact on the habitat and wildlife that use the beach.

Moreover, historical use at Central Beach has demonstrated that off-leash activities on Central Beach inevitably lead to off-leash dog disturbances within the WPA. Given that even within the WPA, dog owners have failed to comply with leash requirements almost 66% of the time, despite years of publicity, education, signage and a fence asking dog walkers to put their dogs on leash in the WPA. The DEIS does not contain any evidence that dog owners will start complying with the new regulations and respect the WPA.

Finally, to the extent that NPS ultimately elects to allow off-leash activities at Central Beach, Golden Gate Audubon recommends (1) that the off-leash area be enclosed by fencing to clearly demarcate the boundaries of the ROLA, (2) that the ROLA be decreased in size to provide adequate buffer zones in relation to the WPA to the west and to the lagoon inlet to the east, and (3) that the Park Service invest in significant education efforts, followed by rigorous enforcement to undo the culture of noncompliance that exists at Crissy Field.

6. GGAS endorses the Preferred Alternative for the trails and grassy areas

near East Beach.

GGAS endorses the Preferred Alternative to allow on-leash dog activity in these areas as indicated by Map 10P in the DEIS with one caveat: the fresh water swale just east of the lagoon should be identified on the map and marked as a "no dog" area.

C. Fort Point Promenade/Fort Point NHS Trails

GGAS endorses the Preferred Alternative as identified by Map 11P of the DEIS. We note some concern for permitting large number of dogs (more than 3) on the relatively narrow paths in this area and reiterate our position that dog walkers should be limited to a maximum of three dogs per person within the GGNRA.

D. Baker Beach and Bluffs to Golden Gate Bridge

Golden Gate Audubon believes that the Preferred Alternative for Baker Beach is not a workable plan. While we support the upland elements of the Preferred Alternative, we have two concerns regarding the beach element of the plan. Firstly, as an area of freshwater flow into the ocean, the mouth of Lobos Creek is a sensitive wildlife area and is the most attractive area of use for birds along this beach. As such, it should be off-limits to dogs and buffered from off-leash dog activity. Secondly, we believe that designating an imaginary line in the sand to distinguish a no-dog area from a leash-only area is not an adequate means of communicating the rule to park users and compliance will be problematic. We believe that the most effective and enforceable choice would be to designate Baker Beach as a no-dog area.

However, should NPS proceed with implementing the Preferred Alternative; Golden Gate Audubon strongly recommends that NPS alter the configuration of the planned leash-only area to adequately protect the Lobos Creek zone. The leash-only area to be shifted to the North Beach as identified on Map 12.

E. Fort Miley

Golden Gate Audubon endorses the Preferred Alternative.

F. Lands End

Golden Gate Audubon endorses the Preferred Alternative for Lands End.

G. Sutro Heights Park

Golden Gate Audubon endorses the Preferred Alternative for Sutro Heights

Park as illustrated by Map 14-P.

H. Ocean Beach

1. Dogs should be excluded from the Ocean Beach Snowy Plover Protection Area.

Golden Gate Audubon endorses the Preferred Alternative to exclude dogs from the Snowy Plover Protection Area (SPPA) and to allow dogs only on-leash on the promenade. We recommend that the designation of Snowy Plover Protection Area be changed to Shorebird (or Wildlife) Protection Area, a term which will more aptly describe the need for year-round protection.

2. GGAS does not endorse the creation of a ROLA north of Stairwell 21. Golden Gate Audubon does not endorse the Preferred Alternative and instead recommends that the GGNRA not allow dogs on Ocean Beach at all. Given historic noncompliance with leash and off-leash regulations and the continuing impact to birds and other natural resources on the beach, dog-related recreation is not an appropriate activity on any beach within the GGNRA.

GGAS acknowledges that given the extreme political pressures put on the Park Service, it is likely that it will elect to create the ROLA on Ocean Beach. Given that, GGAS strongly urges the Park Service to erect post and cable symbolic fencing with adequate signage along the south boundary of the ROLA from the seawall westward as far as is practical to ensure that dog owners and other visitors know they are entering a ROLA. GGAS also strongly encourages that the area be monitored by rangers given the high likelihood of continuing non-compliance with regulations in the area.

3. GGAS strongly supports the closure of Ocean Beach South of Sloat to dogs.

Golden Gate Audubon strongly supports the Preferred Alternative to exclude dogs along Ocean Beach south of Sloat Avenue.

I. The Preferred Alternative Would Fail to Protect the Natural and Aesthetic Resources at Ft. Funston.

1. GGAS opposes the Preferred Alternative to establish a ROLA south of the beach access at Ft. Funston.

Golden Gate Audubon strongly opposes the Preferred Alternative, which creates a ROLA south of the beach access. Given the historic noncompliance by dog owners at Ft. Funston and the sensitivity of the

habitat, Golden Gate Audubon has concluded that dog-related recreation on the Ft. Funston beach is not an appropriate use of the park land. Because dogs should not be accessing the beach at Ft. Funston, Golden Gate Audubon further recommends that NPS not allow dogs on the beach access trails. The presence of dogs on the beach at Ft. Funston will adversely impact shorebirds. Additionally, the presence of dogs on the beach at Ft. Funston will adversely impact park visitors, including equestrians, some of whom have suffered attacks from dogs when riding at or near Ft. Funston.

To the extent that NPS proceeds in allowing a ROLA at Ft. Funston, it must be fenced and fully marked to provide adequate notice to dog owners and other park users about where on- and off-leash dog activities are appropriate.

2. GGAS opposes permitting dog recreation south of the main parking lot.

Dog-related recreation on the Ft. Funston beach is not an appropriate use of that park land, there is no need for dogs to be on the beach access trails, especially Sand Ladder Trail. GGAS recommends that this area be designated as a "no-dog" area.

3. GGAS does not oppose the creation of a ROLA north of the main parking lot provided it is fully enclosed. Golden Gate Audubon will not oppose the establishment of a ROLA north of the main lot at Ft. Funston provided (1) that the ROLA is not established on sensitive habitat, (2) that the ROLA is fully enclosed by fencing, and (3) that the ROLA and surrounding areas are adequately patrolled and leash requirements are enforced.

V. CONCLUSION Thank you for your consideration of our comments. It is our hope that the FEIS will reflect a comprehensive analysis of the impacts that will occur under the selected alternatives and that active education and enforcement is part of ongoing management in the GGNRA for dogs. With a reasonable regulation and adequate enforcement, we believe the GGNRA can continue to accommodate dogs while protection the valuable natural and cultural resources that make the GGNRA an urban national treasure.

If you would like to discuss these issues further, please do not hesitate to contact me at mlynes@goldengateaudubon.org or at (510) 843-6551.

Thank you, Michael Lynes, Conservation Director

Correspondence ID: 4118 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:31:42
Correspondence Type: Web Form

Correspondence: I am writing to share my comments regarding the Golden Gate National Recreation Area's (GGNRA's) draft dog management plan. I have resided in West Sharp Park area of Pacifica, in San Mateo County, since 1996. I frequently walk along the berm behind the Sharp Park Golf Course and traverse all paths leading to, in and beyond Mori Point. I also enjoy other GGNRA areas in Pacifica, including Milagra Ridge and Sweeney Ridge. While I am not a current dog owner, I support those that are, and believe that on leash and some off leash dog walking should be well incorporated into the GGNRA plans. Some comments below are general in nature while others are specific to the proposed alternatives for GGNRA areas that I regularly enjoy and utilize.

General Comments 1. The GGNRA has a recreation mandate. Though the National Park Service generally does not recognize the walking of dogs within park boundaries, GGNRA preserves space in an urban environment. A sustainable approach for city residents, surrounding neighbors and visitors to the bar area to recreate safely with their canine friends that can reduce vehicle miles travelled, and support the local economy, is one that offers on leash and some off leash activity at multiple locations at GGNRA sites. 2. The walking trails / paths where leashed dogs and owners are permitted to enjoy together should be as accessible and well laid out as those offered for the public without dogs. 3. Changes to any plans determined as part of the current process should also include public review and comment session, versus becoming park rule as a result of park restriction enforcement mandates.

Specific GGNRA sites: 4. MORI POINT ? I support Alternative A, No Action (in harmony with 1979 Pet Policy). I have walked all areas of Mori Point for almost 15 years. Never in that time have I been impacted in my enjoyment of the area by individuals with on leash dogs. Watching dogs enjoy the area along with their caretakers has increased my enjoyment of the area. (I do not support off leash dog walking along the more popular trails, as I have on occasion observed unleashed dogs running through the brush including areas that are sensitive to other wildlife.) 5. MILAGRA RIDGE ? I support Alternative E, Most Access ? Most Management Intensive. 6. SWEENEY RIDGE ? I support Alternative A, No Action (in harmony with 1979 Pet Policy). This area is relatively infrequently used. Even if usage were to increase, it does not require a change in Policy.

Thank you for considering my input in the final dog management plan.
Sincerely, Cindy Abbott Pacifica, CA 94044

Correspondence ID: 4119 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:32:13
Correspondence Web Form

Type:

Correspondence: As a 14 year resident of Sausalito who lives near the Alta trailhead - at the end of Donahue, I am tired of the many "professional" dog walkers who consistently violate the limits on number of dogs per person/walker, do NOT put them on leash or have them under voice control when I pass by, and often don't even see when one of the dogs is pooping because they have too many to watch at once, thus they don't consistently clean up after the dogs!

Unfortunately, the ones who violate the rules and behave as described above, outnumber the ones who actually take their responsibility seriously, comply with rules, and try to minimize their impact on the rest of the trail or fire road users, and the surrounding environment.

In addition, the impact to the surrounding land area is being affected because the off leash dogs DO run off the fire roads and trails across sensitive habitat areas, again, because often these dog walkers are not controlling them or keeping them nearby.

I would like to see ALL "professional" dog walkers with more than three (3) dogs per person be REQUIRED to have the dogs ON LEASH AT ALL TIMES when using the Alta Trail, Oakwood Valley Trail, connected fire roads, etc in this area; or BANNED COMPLETELY!

In general, many of the dog owners who are out with their one or two dogs, are more careful about cleaning up after their dogs, keeping them under control, and easy to co-exist with for those of us who walk here regularly.

Please fix this problem by restricting the professional dog walkers by banning them completely, or enforcing on leash requirements, for the rest of us to enjoy this high use area.

Correspondence ID: 4120 **Project:** 11759 **Document:** 38106

Received: May,30,2011 21:33:57

Correspondence Type: Web Form

Correspondence: Please listen to the Supervisors and to the community. Do not take away off-leash rights that have been in place since the 1970's with everyone coexisting quite nicely. Think of the amount of complaints versus how many people and dogs use Crissy field and Fort Funston every day! Think of the impact on the city parks if all of those dogs converge on the city off-leash areas. Think of the costs of trying to enforce such a ban on thousands of people who believe it is their right to walk dogs off-leash in those designated areas! Don't make a problem where none exists!

Thanks.

Correspondence ID: 4121 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, My name is Tim Arata and my wife and I are both dog owners and environmentalists. We support numerous causes around the world including The Heifer Foundation, Save the Manatees, and the Sierra Club. The organizations that we support sensibly take into consideration the interactions of humans, animals, and the environment we all share. We usually take our dogs to Fort Funston and Stern Grove. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

I admit to being a little bit angered by the lack of common sense that the current proposal contains. Dog owners and their dogs have it in our best interest to support/maintain the lands in question. Any degradation of these lands works directly against our interest and that of the community. Also, the current proposal does not account for the potential danger of removing so much land for free use by dogs and their owners. If you cite danger to other non-owners as a reason for doing this, you're creating a much bigger problem than you're attempting to solved by drastically diminishing available open dog areas. Thus, more dogs in tinier locations. Your proposal is drastic to the point of being antagonistic: You're asking elderly or physically challenged folks who take their dogs to Fort Funston to descend huge sand stairs or a lengthy vertical beach approach to let their dogs off-leash? The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make

the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely, Tim Arata (name) (address) San Francisco, 94132

Correspondence ID: 4122 **Project:** 11759 **Document:** 38106

Received: May,30,2011 21:36:12

Correspondence Type: Web Form

Type:

Correspondence: Sweeney Ridge Alternative C is far too restrictive. I have respectfully used these trails for 11 years with my dogs and it is a wonderful, peaceful place to walk. The number of people that use the trails is small, especially Notch trail, which until 2011 was open to dogs on-leash. Notch trail and the paved path off Sneath Ave are so close to residents in the Skyline college area, which is why I used it so often over the years. It is a place I can easily get to after a hectic day at work to unwind, exercise with my dogs, and appreciate the beauty of the Bay Area. I feel the 'preferred alternative' unfairly excludes local residents with dogs. Please reconsider closing Sweeney Ridge to people enjoying an outing with their dogs.

Correspondence ID: 4123 **Project:** 11759 **Document:** 38106

Received: May,30,2011 21:38:24

Correspondence Type: Web Form

Type:

Correspondence: To the Park Service:

I am concerned that the Park Service represents a ham-handed and insensitive presence in these important lands adjacent to densely-populated urban areas. Nothing riles people up like unfair and burdensome restrictions on dogs being dogs -- enjoying some fresh air and stretching their legs off-leash in the way that best promotes their health and well-being.

The Park Service may be pursuing laudable environmental goals, but alienating a large portion of the adjacent population by taking away the last

opportunity for their dogs to run around and have fun being dogs in natural areas is not a smart move.

Sorry. I say this as a life-long environmentalist. You need the support of the population to make these parks work. This is not the way to do it.

Lynn Fuller

Correspondence ID: 4124 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:38:47
Correspondence Type: Web Form
Correspondence: I'll keep it very short and simple. Responsible dog owners enjoy the GGRNA and are one of the top groups of users of the area. We should be able to remain one of your top customers. If there is a financial issue around it, I'm happy to pay a small fee to GGRNA to "permit" our pups to continue to enjoy the beauty of the GGRNA.

Todd Soller - proud owner of a sweet yellow Lab who loves the water

Correspondence ID: 4125 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:44:43
Correspondence Type: Web Form
Correspondence: Due to the controversial nature of this issue, I think it is imperative that the comments submitted be evaluated via outside, independent review. Thank you.

Correspondence ID: 4126 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. The DEIS is not based on fact; instead, it relies on speculations like "may" and "could" through out the document concerning justification for alternatives. It exaggerates number of dog incidents vs actual law enforcement data obtained through FOIA, and is full of misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet

policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

The GGNRA has had the opportunity to make a Section 7 Special regulation to codify this form of recreation in the reg's. However, the GGNRA continues to spend millions of dollars to force an end to a recreational activity that generations of Bay Area residents and visitors have enjoyed. The GGNRA was given this land on the premise of maintaining needed recreation within this urban area. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. Under NEPA the DEIS has failed to address the human element.

As an avid hiker, environmentalist and user of the coastal recreation areas (namely Mori Point, Ft Funston, Ocean Beach, Milagra Ridge, Sweeney Ridge) I have witnessed use of these lands by a broad based multicultural group of people which encompasses all age groups. These people along with myself utilize this recreation area to enjoy nature, find solitude and escape into "our backyard" away from the dense urban areas that surround us.

There is very little area within the GGNRA that we can actually hike with our dogs and the DEIS alternatives attempt to strip this away further. The alternatives for San Mateo County areas and new and acquisitions are devastating to the residents and communities who currently utilize this space. Diffusion is the key to conservation and preservation not concentration into smaller and smaller areas. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. ? Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. The "confusion" concerning dog-walking areas within GGNRA lands is fostered by lack of good signage, public outreach and education by the GGNRA. The draconian "compliance-based management" needs to be removed altogether and GGNRA just needs to enforce the present rules. Better signage, use of

proven vegetative barrier methods are some of the simple and cost effective ways to end this "confusion."

The alternatives state that additional staff must be hired to enforce the "compliance-based management" plan. Why is this necessary? The GGNRA does not even enforce or educate the public about today's dog-walking rules. Punish the bad apples not the entire dog-walking community at large. I do pick-up after my dogs and I do pick up other stuff that humans leave behind, glass, trash, etc. My dogs are under voice control when in off leash areas. They are not allowed to dig or disturb wildlife. The same is true when we are walking or hiking on trails within on-leash areas.

I disagree with the proposed trail usage reductions under the preferred alternatives for Mori Pt, Milagra and Sweeney Ridge. The trails and paved areas at Milagra Ridge protect both plant and wildlife, there is no need to reduce trail access at all. The other areas can continue to support access to people with dogs without disturbing wildlife. The red-legged frog is nocturnal and is well hidden during the day. Field biologists have a difficult time locating unless there is a radio transmitter attached to the frog. The SF garter snake is also very elusive and stays well within cover. I think there is a slim to none chance that my dog "may" or "could" disturb one of these animals. They would be gone long before hand at first human disturbance. The scientific community at large acknowledges the most critical habitat for these animals in San Mateo County is located on privately held lands.

Fort Funston is far from being a pristine wilderness area. The community who uses this area day in and day out even during the bleakest, windiest, sand-blown days is the dog-walking community. It wasn't always a safe place to visit because of drug users and other nefarious individuals who would frequent Battery Davis and surrounding wooded areas. Single women or seniors did not dare ever go there alone. The safety at Fort Funston is due in large part to the tight knit community of dog walkers keeping an eye (for free!) on things.

I would not feel safe as a single woman walking without my companion dogs at Ft Funston, Mori Point, Milagra Ridge (emphasis added) or Sweeney Ridge (emphasis added).

I have had the pleasure to travel to and visit all National Parks in the Western United States (including Hawaii). The GGNRA is not a National Park by any comparison. It truly is an urban recreation area that borders several million inhabitants. By enjoining the dog-walking community of people who use and love these areas rather than alienating them the GGNRA can find a successful dog management plan. The DEIS in it's current state and planned alternatives are not one.

The public would best be served by institution of the 1979 Pet Policy to include new land acquisitions as the Section 7 Special Regulation for the GGNRA. Sincerely,

Cindy DelCorto

Correspondence ID: 4127 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:50:29
Correspondence Type: Web Form
Correspondence: My husband and I are in the process of relocating ton the SF Bay area. We are dog owners and dog lovers. We took our dogs to Ft Funston today and had a lovely walk. And, our dogs had a great time being dogs. Please keep this area off leash for our four legged friends who do so very much for their human companions. We have chosen to live in San Francisco because it is not only culturally diverse, but renowned for being a dog friendly city. Please don't let dogs and their humans down.

Correspondence ID: 4128 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:50:39
Correspondence Type: Web Form
Correspondence: Please consider that there a few places in the City where we can let our dogs off leash. There are many places for families with kids but limited areas for families with dogs. Dogs need outlets to run and explore and release energy. If you limit the areas we can have off leash dogs or dogs at all, it is creating more problems that you are trying to avoid. Please consider the well being of our animals that bring joy and life to many residents in the City and in the Bay Area. Thank you

Correspondence ID: 4129 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979" Pet Policy" and provide balanced off-leash options for new lands acquired since 1979. PLEASE let us enjoy our dogs and our parks. We take care of them!

Correspondence ID: 4130 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:52:19

Correspondence Web Form

Type:

Correspondence: Dear Superintendent Dean,

I am writing to oppose the GGNRA's Draft Dog Management Plan because the Visitor Experience section of the Draft Plan focuses on park users who don't want to be around dogs, including minorities, seniors and children.

I myself as a member of the minorities who visit GGNRA lands 4 days a week do not see such phenomenon described in the Draft Plan. In fact, many of my fellow Asian friends, with or without dogs, visit Ocean Beach and Fort Funston regularly.

Off-leash dog walking as a barrier to lower-income residents to visit GGNRA parks is also an irrelevant statement and even misleading. There might be more significant reasons that prevent lower-income residents from park visitation, such as financial burden, lack of public transportation vehicles, as well as their already-established community in their local parks.

If any racial data is to be included in the Draft Plan, the GGNRA must provide more details on park use by different races, which is information that the Plan already states it does not have. GGNRA can also expand the outreach to residents of a minority-majority city such as providing copies of the Draft Plan in different languages other than English.

Thank you for your consideration.

Sincerely, Tszsan Kathy Reichardt

Correspondence ID: 4131 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I do not understand how the federal government can, on one hand, allow offshore drilling next to our fragile coastlines, and on the other hand tell us that the dogs of the SF Bay area are enough of a potential threat to the ecology that they should be banned from the natural recreation spaces. It doesn't make sense. People with dogs in the SF Bay area are, in general, very responsible and are very often the ones using the recreational spaces and cleaning up garbage that others have left behind. Children and teens are more destructive and disruptive of the natural species than the dogs.

I am writing to comment on the GGNRA DEIS plan regarding dog management. I agree completely with the writers below. They have stated

our case comprehensively.

Over the years we in the dog community have repeatedly commented, discussed, testified, written, lobbied, compromised, negotiated, and worked with the GGNRA to ensure fair and reasonable access to lands acquired with our help. We have raised money, volunteered our time, attended hearings, served on committees, and participated in negotiated rule-making in good faith.

Most of this has come to naught.

If you really intend to handle this issue fairly, you would scrap the whole thing and start over. You would do so for reasons articulated clearly in the following documents:

* Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group;

* Unleashed Fury by Julie Walsh;

* Letters from the SF/SPCA to the GGNRA dated July 13 and August 16, 2000, from Ed Sayres, the Executive Director of the SPCA at the time;

* SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org;

* Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

* Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

* Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11.

Thank you very much.

| | | | |
|-----------------------------|----------------------|-----------------------|------------------------|
| Correspondence ID: | 4132 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 21:52:47 | | |
| Correspondence Type: | Web Form | | |

Correspondence: Parks are to be a refuge. People need some space where we do not have to put up with dogs running wild. Parks should be a place where a person can enjoy the quiet peacefulness of nature.

While walking on Ocean Beach I noticed a woman whose dog was running loose. When I informed her that this was a protected area for birds she replied "It's ok. There aren't any cops around."

A man who I informed about the protected area at Ocean Beach said "My dogs never catch the birds so it's ok." He went on to say that he would let his dogs run loose wherever he wants.

Dogs seem to run wild everywhere. Why can't people have some space where we do not have to put up with dogs running wild? On Ocean Beach this would also greatly benefit the birds in the area and we would see more birds when they are not constantly frightened by dogs running after them.

Correspondence ID: 4133 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to comment on the GGNRA DEIS plan regarding dog management. I recently moved to San Francisco with my Labrador Retriever. I have enjoyed taking him to Ocean Beach and Fort Funston. I am a responsible dog owner, and the dogs we have encountered are well-behaved with responsible owners. I have researched the proposal in depth and believe it is too drastic! I have found there to be many resources in the dog community who have over the years we have repeatedly commented, discussed, testified, written, lobbied, compromised, negotiated, and worked with the GGNRA to ensure fair and reasonable access to lands acquired with our help. We have raised money, volunteered our time, attended hearings, served on committees, and participated in negotiated rule-making in good faith. I agree completely with the writers below. They have stated our case comprehensively. If you really intend to handle this issue fairly, you would scrap the whole thing and start over. You would do so for reasons articulated clearly in the following documents:

Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group;

Unleashed Fury by Julie Walsh;

Letters from the SF/SPCA to the GGNRA dated July 13 and August 16,

2000, from Ed Sayres, the Executive Director of the SPCA at the time;

SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org;

Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11. Thank you very much.

Correspondence ID: 4134 **Project:** 11759 **Document:** 38106

Received: May,30,2011 21:54:15

Correspondence Type: Web Form

Correspondence: I am a San Francisco home owner, Fort Funston, Crissy Field, and Ocean Beach user, and dog guardian. I visit Fort Funston several times a week and Crissy Field and Ocean Beach monthly; I have been doing so for the last 8 years with my dog.

Being able to relax and enjoy the community and beauty of Fort Funston with my dog is very important to me. When at any of the GGNRA parks, I keep my dog under voice and sight control and clean up his waste. I do not go to the parks to play fetch with my dog; I enjoy hiking on trails with my dog and I am far from the only one. There are too few trails with off-leash access in the Preferred Alternative.

I disagree with the GGNRA's current preferred alternative since it greatly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County aren't based on sound science or long-term monitoring of site specific conditions. And they are in violation of the reason that the GGNRA was created in the first place: "The maintenance of needed recreational open space."

Urban dogs need regular exercise and socialization to successfully live within cities. Fort Funston is the primary location where I can take long walks and get exercise as well as exercise and socialize my dog. The land currently available in the GGNRA for off-leash use is crucial for the

exercise, recreation, and overall health of dogs and dog guardians of San Francisco.

Instead of the DEIS, I would support Alternative A, the No Action alternative and would suggest the inclusion of the "New Lands" areas in San Mateo county. The existing 1979 Pet Policy has been working well for many years and should not be altered.

Respectfully,

Kelly Winqvist

Correspondence ID: 4135 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to comment on the GGNRA DEIS plan regarding dog management. I agree completely with the writers below. They have stated our case comprehensively.

Over the years we in the dog community have repeatedly commented, discussed, testified, written, lobbied, compromised, negotiated, and worked with the GGNRA to ensure fair and reasonable access to lands acquired with our help. We have raised money, volunteered our time, attended hearings, served on committees, and participated in negotiated rule-making in good faith.

Most of this has come to naught.

If you really intend to handle this issue fairly, you would scrap the whole thing and start over. You would do so for reasons articulated clearly in the following documents:

Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group; Unleashed Fury by Julie Walsh; Letters from the SF/SPCA to the GGNRA dated July 13 and August 16, 2000, from Ed Sayres, the Executive Director of the SPCA at the time; SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org; Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11; Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11; Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog

Plan, by Arnita Bowman, 5/23/11.

Thank you very much.

Correspondence ID: 4136 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: We love San Francisco for it's dog friendliness, please make sure that doesn't change

Correspondence ID: 4137 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:56:24
Correspondence Type: Web Form
Correspondence: Hello, I am a concerned, responsible dog owner. I know you will soon be making a ruling regarding the land in Pacifica and Montara and dogs. I ask that you vote in favor of allowing dogs on leashes in these areas. There are so few places to be able to take dogs. We have lived in this area nearly 30 years. It is a wonderful family community, and our family also includes a dog. Please allow us to continue to walk our dog in our own home town as well as Montara. We love the natural beauty of the trails and being able to take family walks along the ocean. Thankyou, Linda Bruno

Correspondence ID: 4138 **Project:** 11759 **Document:** 38106
Received: May,30,2011 21:58:04
Correspondence Type: Web Form
Correspondence: Under every circumstance regarding responses to public comment, an independent review is demanded and must be made by a third-party impartial entity.

Additionally, I am requesting a response to all of the substantive issues that have been put forth in the submitted comments below already received by your office on this matter:

- Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group;

- Unleashed Fury by Julie Walsh;

- Letters from the SF/SPCA to the GGNRA dated July 13 and August 16,

2000, from Ed Sayres, the Executive Director of the SPCA at the time;

- SFD OG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFD OG.org;

- Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

- Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

- Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11.

Thank you in advance.

Correspondence ID: 4139 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30t h, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, My name is Abby Tuttle and I share my life with two wonderful dogs in San Francisco's Duboce Triangle. We are frequent and grateful users of the off leash areas at the GGNRA. I am also a teacher with a degree in environmental education.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is

preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely,

Abby Tuttle San Francisco, CA 94114

Correspondence ID: 4140 **Project:** 11759 **Document:** 38106
Received: May,30,2011 22:02:24
Correspondence Type: Web Form
Correspondence: Having heard both sides of the dog management controversy, I urge that National Park Service to do whatever is necessary to protect Western snowy plover and native plant habitat from being further eroded by off-leash dogs. Field studies show that 2/3 of dog owners disregard leash laws and allow their dogs to roam free, regardless of the consequences to wildlife.

The NPS has been charged with maintaining this precious parkland for future generations to enjoy. Don't let the dog lobby - which is a very vocal minority, but still a minority - override a common-sense approach to this issue. Remember: dogs can live inside, or go to other parks, but wildlife has only one home: the wild.

Please make the GGNRA habitable for wildlife. Thank you.

Correspondence ID: 4141 **Project:** 11759 **Document:** 38106
Received: May,30,2011 22:05:21

Correspondence Web Form

Type:

Correspondence: I am a dog owner and San Francisco home owner who frequents Fort Funston, Crissy Field, and Ocean Beach. For the past 8 years I have been visiting Fort Funston several times a week and Crissy Field and Ocean Beach monthly with my dog.

Hiking with my dog at Fort Funston is very important to both his and my well being. While at the park, my dog is under both voice and sight control and I always clean up his waste.

The GGNRA's current preferred alternative greatly restricts and eliminates off leash dog walking in many areas within the GGNRA and violates the GGNRA's initial purpose: "The maintenance of needed recreational open space." For these reasons, I oppose it. The currently proposed changes to the existing conditions (1979 Pet Policy) aren't based on sound science or long-term, substantial monitoring of site specific conditions.

Urban dwellers, both human and dog, need open spaces where they can get exercise and enjoy nature. Dogs especially need regular exercise and socialization to be successful urban citizens. Fort Funston is the best place by far that I've found where both my dog and I can exercise and enjoy our recreational time.

I would support Alternative A, the No Action alternative, instead of the DEIS. The 1979 Pet Policy has worked well for many years and should not be removed or changed.

Respectfully,

William Summer

Correspondence ID: 4142 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to comment on the GGNRA DEIS plan regarding dog management.

I agree completely with the writers below. They have stated our case comprehensively. I have been involved with this issue for close to two decades.

Over the years we in the dog community have repeatedly commented, discussed, testified, written, lobbied, compromised, negotiated, and worked

with the GGNRA to ensure fair and reasonable access to lands acquired with our help. We have raised money, volunteered our time, attended hearings, served on committees, and participated in negotiated rule-making in good faith.

Most of this has come to naught.

If you really intend to handle this issue fairly, you would scrap the whole thing and start over. You would do so for reasons articulated clearly in the following documents:

* Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group;

* Letters from the SF/SPCA to the GGNRA dated July 13 and August 16, 2000, from Ed Sayres, the Executive Director of the SPCA at the time;

* Unleashed Fury by Julie Walsh;

* Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

* Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

* Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11;

* SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org.

Thank you very much.

Correspondence ID: 4143 **Project:** 11759 **Document:** 38106
Received: May,30,2011 22:08:37
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean, GGNRA and NPS staff:

Thank you very much for the opportunity to comment on the proposed Dog Management Plan. I appreciate your efforts to engage the public over the

last several months and prior as this is an issue that affects us all.

I am writing to express my support for the preferred alternative, with some basic adjustments. I base my support on the following:

- the preferred alternative makes the best attempt to maintain dog walking, and general public enjoyment, in the park while respecting natural and cultural resources - the preferred alternative makes the best attempt to maintain dog walking in the park with consideration for the variety of public uses, particularly in heavily used areas - the preferred alternative makes the best attempt at clarifying the need for dog management in a national park in an urban area that does not have a gate or clear boundaries

The basic adjustments I suggest include a better loop at Mori Point, an internal loop at Fort Funston, and some modified alternative to the Muir Beach regulation that also ensures natural resource protection goals are met. At Muir Beach, I fear the residents and regular users will not abide to a "no dog" rule which could only create tensions at that site and elsewhere.

I primarily hike, and have rarely had trouble with dogs in the locations I frequent (Mori Point and Marin Headlands). It seems my fellow park users recognize the value of the resources that require protection and the value of sharing the trail, at least with hikers.

I often go to Ocean Beach with my young, 4-year old son and, unfortunately, feel less and less comfortable there. I can't trust the unleashed dog or its owner to keep him from my son. I can't stand watching an unleashed dog chase a snowy plover. I no longer go to Fort Funston because of these two reasons. I don't want to lose Ocean Beach too.

I know you and your staff have considered all options as far as communicating with the public in this current effort and over the past decade and more. If possible, I encourage walks and talks on site, perhaps at a pilot site or two, with relatively sympathetic onleash, off leash, and other advocates invited to meet GGNRA staff. I encourage better, more attractive and easy to read signage. I encourage some kind of public information campaign and wonder if funding is available? I know staffing is extremely limited. I am concerned this plan all comes down to an already put upon law enforcement staff and wonder how they and the Park might be better supported.

Thank you very much for your consideration and all you and your staff do to protect and manage our amazing National Park. all the best to you through this and more - Jennifer Greene Ringgold

ID:

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: May 30, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan as outlined in the draft DEIS especially with regard to addition of new lands into GGNRA. The public has not had the opportunity to participate in the development of the Dog Management Plan. If it had and the wishes of the public had been taken into account we would not be dealing with a plan at this late date so out of touch with the wants and desires of the GGNRA main constituency: the residents of Marin, San Francisco, and San Mateo counties. The resistance of the NPS and the drafters of the DEIS dog management plan to hear and or consider the views of those of us who recreate with our dogs is strong indication of prejudice on their part.

It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

And finally, your action on this issue will largely define whether I, a life-long supporter of the national parks will remain so or ?

Ask yourself: would Gifford Pinchot approve of the plan as it is currently written? Or would he be asking himself: What has happened to my park service? Sincerely, Jeff Thayer Montara, CA, 94037

Correspondence ID: 4145 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:10:31

Correspondence Type: Web Form

Correspondence: Re: Draft Dog Management Plan/Draft Environmental Impact Statement
Dear Superintendent Dean: My name is Nina Lescher and I have been a Bay Area resident for 16 years. I currently own a home in Marin County, and consider myself very lucky to be able to have The Golden Gate National Recreation Area in my backyard. I have been an avid fan of Crissy Field for years, primarily because all sorts of people come there to stroll, picnic, windsurf, kite surf, jog, and play Frisbee or football. Many people come to let their dogs run off leash and play. I haven't been a dog owner for very long, but I have always been really proud of the Bay Area for being conscientious enough to preserve places where people, off leash dogs, and nature could come together. I have traveled a lot and rarely found this anywhere else, and I believe the overall happiness and well being of Bay Area residents is so high because we have places like Crissy Field and Fort Funston where dogs, people and nature co-exist. Now that I own a dog, he and I visit Crissy Field, Fort Funston, Marin Headlands, Rodeo Beach, Muir Beach, Oakwood Valley and Homestead Valley a minimum of 1-2 times a week. So that is why I am writing to voice my disapproval of the Draft Dog Management Plan and request that it be entirely rejected, or that Alternative A be selected for all sites. The current Preferred Alternative Plan is so severely restricted that it is unacceptable. The available data concerning environmental impact is insufficient. As an avid environmentalist, I am very supportive of the work the GGNRA has done to curtail erosion and protect plant and wildlife in the parks. I make sure that neither I nor my dog goes into areas that have been fenced off and designated (with signage) for replanting or environmental protection. In my experience, all dog-owners I've come across in GGNRA areas have very effectively used voice control to keep their dogs off these areas. The GGNRA signage that informs visitors of the environmental work that's going on, and the alert to keep off those specific areas, shows everyone that we are a strong community working together to keep these areas beautiful for all. This is one reason why the Compliance Based Management strategy should be eliminated. It severely undermines the flow of communication between the public and the GGNRA, something that has been working effectively and can continue to get better. Ultimately, the Compliance Based Management strategy damages the collaborative relationship that makes the GGNRA a wonderful place. Lastly, if the GGNRA is going to continue being one of California's-if not this nation's-ideal recreational area, a new plan must be proposed that builds on what is already working so well for so many people. Since a new plan is not currently in place, Alternative A is the best plan. There are a huge number of dog owners in the Bay Area who depend on the GGNRA for off-leash dog recreation, and the number is only growing. Limiting their access

to less than 1% not only makes the GGNRA a less desirable place to go, it diminishes the Bay Area as a whole as a desirable place to live. Dog owners would have one less reason to put up with the high cost of living if their wonderful places to recreate are taken away. Returning to the 1979 Pet Policy, which had been working so well for so many years, appears to be the best solution for our active outdoor community. I do hope you'll consider returning to that as a template going forward. Let us not forget that the GGNRA's original mission, outlined in the legislation that created it, was "to provide for the maintenance of needed recreational open space." Regards,
Nina Lescher

Correspondence ID: 4146 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:11:18

Correspondence Type: Web Form

Correspondence: I wrote in earlier that I didn't see any signs in the Crissy Fields area of the GGNRA. Today I saw them but they must have just been put up (the last day of the comment period). I didn't see any on Friday, Saturday, or Sunday this past weekend or any other times during the comment period. Why weren't these signs up during the entire comment period? How can the public comment on a document it doesn't know exists?

Correspondence ID: 4147 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:14:08

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean and GGNRA,

I fully agree with this letter from my husband. I would also like to add, as a native San Franciscan, and true City girl this is as close as I get to nature! I immensely enjoy watching all the happy dogs frolicking with their owners and other canine friends!

Mary Ann Donohue

I am writing to you to let you know that I oppose your plan to limit dogs in the GGNRA.

I am particularly concerned with the plans to limit dogs at Fort Funston. As a native of San Francisco I have been going to Fort Funston for over 40 years, and my appreciation of it has grown immensely since I started taking my first dog there eleven years ago.

I see enormous value to the community to have an area where people can

enjoy the outdoors and have their four legged family members enjoy a little freedom. I visit Fort Funston every weekend, my wife joins us on Sunday, regardless of the weather; fog, wind, rain or shine. I look forward to this activity, partly because of the walk (takes my dog Sparky and myself 50 minutes to do a loop), the beauty and also the friendliness of the other dog owners and the sheer joy you see in dogs and people of all ages.

I do feel that things can be done to help preserve the area, but the plan put forward goes way to far. I would suggest:

? All trails should be off leash (voice command) this includes: beach, Chip trail, Horse Trail, Sunset Trail, Battery Davis Trail, Coast Trail, trails to the beach and the trail from the ranger station to the main parking lot ? I think most of the damage done by dogs are from their owners throwing balls in areas that dogs should stay out of. ? There should be a few designated area where dogs can chase balls (in front of the main marking lot, drinking fountain area by stairs, beach and on marked trails. ? GGNRA should repair the fences in the habitat protected areas and post signs with the fine amount. ? Rangers should patrol the area to enforce the new rules

I would like to see a reasonable plan put forward by the GGNRA, but the plans you have proposed would significantly reduce my enjoyment of the area and I think it would also reduce the benefit that the community gets from having an off leash area of this size available.

Have you ever been to Fort Funston on a weekend and seen this enjoyment?

Robert Valle San Bruno, CA 94066

Thanks

Correspondence ID: 4148 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: 5/30/2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the

GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA) Sincerely, Tori Klopfer San Francisco, Ca 94122

Correspondence ID: 4149 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify

such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

?Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

?Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

?Exclude speculative, exaggerated, biased, or misleading statements and studies.

?Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

?Enable professional dog walking and align any professional dog walking rules with county or city regulations.

?Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely, Cari Delaplane San Francisco, CA 94117

Correspondence ID: 4150 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to comment on the GGNRA DEIS plan regarding dog management. I agree completely with the writers below. They have stated our case and my position on this issue comprehensively.

Over the years we in the dog community have repeatedly commented, discussed, testified, written, lobbied, compromised, negotiated, and worked with the GGNRA to ensure fair and reasonable access to lands acquired with our help. We have raised money, volunteered our time, attended hearings, served on committees, and participated in negotiated rule-making in good faith.

Most of this has come to naught.

If you really intend to handle this issue fairly, you would scrap the whole thing and start over. You would do so for reasons articulated clearly in the following documents:

? Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group; ? Unleashed Fury by Julie Walsh; ? Letters from the SF/SPCA to the GGNRA dated July 13 and August 16, 2000, from Ed Sayres, the Executive Director of the SPCA at the time; ? SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org; ? Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11; ? Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11; ? Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11.

Thank you very much.

Kasie Maxwell Native San Francisco Bay Area resident Environmentalist; vegan since 1980 Former vet-tech, pet sitter/dog-walker Former professional equestrian (east bay) Wildlife rehabber (not in CA, while living in Oregon) 1991-1995 Permanently disabled since 2001 I have been visiting these parks daily with generations of dogs since 1995; I do not go hiking without my dogs. They are always under voice control. Webmaster, SFDOG from 2003-2007 Founder & past president, D5DOG

Correspondence ID: 4151 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to comment on the GGNRA DEIS plan regarding dog management. I agree completely with the writers below. They have stated our case comprehensively.

Over the years we in the dog community have repeatedly commented, discussed, testified, written, lobbied, compromised, negotiated, and worked with the GGNRA to ensure fair and reasonable access to lands acquired with our help. We have raised money, volunteered our time, attended hearings, served on committees, and participated in negotiated rule-making in good faith.

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If you really intend to handle this issue fairly, you would scrap the whole thing and start over. You would do so for reasons articulated clearly in the following documents: ?Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group; ?Unleashed Fury by Julie Walsh; ?Letters from the SF/SPCA to the GGNRA dated July 13 and August 16, 2000, from Ed Sayres, the Executive Director of the SPCA at the time; ?SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org; ?Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11; ?Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11; ? Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11. Thank you very much.

Jess

Correspondence ID: 4152 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 30, 2011 Frank Dean, General Superintendent?Golden Gate National Recreation Area?Fort Mason, Building 201?San Francisco, CA 94123-0022

Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions.This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the

GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: I have enjoyed taking all of my dogs to Fort Funston, Crissy Field, and Ocean Beach (which I live 2 blocks away from) for the past 18 years. If I had not had these places to take my dogs they would not be the well socialized well mannered dogs they were/are. I can't imagine not being able to take my dogs off leash to let them run and play with other dogs. The off leash parks are few and far between and frankly too small for all the dogs that would go there if the GGNRA was off limits. If you ban off leash dogs in the GGNRA the city parks will greatly suffer, dogs/owners will suffer, neighbors will get angry etc, lawsuits the list goes on and on. Please do not impose bans in these areas its a bad idea, crime rates would dramatically increase in Fort Funston as a result of having no dogs etc, would revert back to what it used to be will all the drug dealers etc. NOT A GOOD THING for the Fort. If you try to ban off leash dogs at ocean beach all the people who have dogs will have no place to take their dogs close to where they live. I have never run into a ill mannered off leash dog at Ocean Beach. Dogs are not the ones destroying the bird area for the snowy plover. I've lost count how many times I've seen the Beach Patrol SUV driving over the areas higher up on the beach where the bird habitats are, dogs don't go to that area, they are at the lower areas near the water. PLEASE DO NOT BAN OFF LEASH AREAS IN THE GGNRA. You could be doing far better things in the reserve area than banning dogs and pissing lots of people off. Sincerely,

TL Winkler San Francisco, CA 94116

| | | | |
|-----------------------------|--|-----------------------|------------------------|
| Correspondence ID: | 4153 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 22:25:31 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I have never seen dogs at Ft Funston bother bank swallows. I have witnessed many times over many years bank swallows swooping in and flying behind dogs catching the insects they kick up when they are walking in open areas. | | |

I have seen predation of bank swallows by the crows/ravens whose numbers

seem to be ever increasing at Ft Funston. They sit at the cliff tops and wait.....

Correspondence ID: 4154 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:25:36

Correspondence Type: Web Form

Correspondence: I walk my well-behaved dog on a regular basis in the GGNRA areas. She is on a leash and I always pick up after her. It is extremely important for her to be outdoors and on a walking trail for her health and well being and mine. Please keep the GGNRA open to walking dogs on leash. Our tax dollars are paying for this area and we all own it and use it. It is unfair to close it off to walking dogs especially since these are areas have been used for a variety of uses for many, many years. 99.9% there are no problems with dogs and dog walkers in the GGNRA. Please don't close this off to the majority when the problems are so few. Best, Peggy Ruse

Correspondence ID: 4155 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:26:38

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean,

I believe that this whole DEIS was started by Mr. Jarvis and now it is in your lap. I hope you have the good sense to see that the passage of any of the alternatives is a bad idea and not in keeping with the R in GGNRA. There can be exceptions to the NPS guidelines and this is the occasion. The original 1979 ruling in regards to off leash dog walking areas should be honored. The bad science in the DEIS doesn't prove that dogs off leash are bad. The plants are better than they have ever been, the wildlife is more abundant than it has ever been and there are more people enjoying the GGNRA. I walk my dog off leash at Crissy Field, Baker Beach and Ocean Beach. He is always under voice control and loves to chase his frisbee both in and out of the water. Both these activities would be impossible if he were on leash. I see nothing but smiling happy people enjoying the beach. Of course there is the rare unsmiling individual and those are probably the ones who don't like dogs. I think these people probably have other more severe problems as well.

Dogs came over on the Mayflower with some of the first settlers. The American Indians had dogs. Dogs are now and have always been a valuable ally to man. While their role has changed from more of a working dog to more of a companion animal they are still a dynamic part of our lives. Just look at what dogs are used for now; from helping to find Osama, to finding

survivors in Fukushima to guiding the blind, bringing comfort to the sick and even helping detect cancer, diabetic comas and epileptic seizures. Dogs make people happy, go for a walk on the beach and you will see the smiles and friendships that flourish around these man/dog relationships. Don't take away this great recreation area from the people and their dogs.

How many people who came up with the DEIS actually are from San Francisco and have dogs and aren't agreeing with it because they need the job? I bet none. I've been in the city for over 30 years and I love it. How can you outsiders come in under the auspices of the U.S. Government and decide you know what is best for our city? The city Supervisors agree with us, your plan is bad. The U.S. Government broke every treaty they ever made with the American Indians. Don't do the same to the dog owners of San Francisco, honor the 1979 pet policy and keep the R in the GGNRA. If you stand up to Jarvis it might mean your job but at least you'll have your dignity!

Correspondence ID: 4156 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to comment on the GGNRA DEIS plan regarding dog management. I agree completely with the writers below. They have stated our case comprehensively.

Over the years we in the dog community have repeatedly commented, discussed, testified, written, lobbied, compromised, negotiated, and worked with the GGNRA to ensure fair and reasonable access to lands acquired with our help. We have raised money, volunteered our time, attended hearings, served on committees, and participated in negotiated rule-making in good faith.

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* Unleashed Fury by Julie Walsh;

* Letters from the SF/SPCA to the GGNRA dated July 13 and August 16,

2000, from Ed Sayres, the Executive Director of the SPCA at the time;

* SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org;

* Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

* Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

*

Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11.

Thank you very much.

Correspondence ID: 4157 **Project:** 11759 **Document:** 38106
Received: May,30,2011 22:34:06
Correspondence Type: Web Form
Correspondence: To the National Park Service/Golden Gate National Recreation Area Supervisor,

I walk with my two dogs every day in the Presidio and Crissy Field areas of the park. I am opposed to the DEIS and in favor of the preferred alternative dog plan. I am very upset that the park service has changed its mind in with regard to the importance of needed recreational open space for the general public and its especially egregious attack evidenced by the DEIS against dog owners. Off leash dog walking on Crissy Field has been a part of my life for over 40 years as a permanent resident of San Francisco. The alternative plan is a fair way to share this resource.

I would also like to point to the GGNRA's current plan to attract 20,000 children and their families (60,000+ new visitors)to Crissy Field next year. This plan is posted on signs at Crissy and is hypocritical to the NPS reasoning that restricting dogs will improve conditions for wild animals. Come on! These visitors will do far more damage. More money is spent cleaning up and addressing damage caused by people than dogs.

Another example of the NPS anti-dog agenda is the DEIS provision, that as

I understand it, will recind all off-leash rights for dog owners based on even one, single infraction. OMG! this is anti-american.

I suggest the NPS focus its attention on banning guns in national parks if it wants to truely protect wildlife.

Sincerely, Curt Smith

Correspondence ID: 4158 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:37:48

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I oppose the GGNRA's current preferred alternative to restrict and in some areas eliminate off leash dog walking in the GGNRA. I am a San Francisco resident who volunteered for five years in the dog behavior department of the San Francisco SPCA. I adopted a puppy in October 2010, and I frequently visit Fort Funston and Crissy Field with him. When I adopted my dog, he was afraid of other dogs. I have taken him to an off-leash dog park every day since last October, and he is now a well socialized dog who obeys my voice commands and is friendly with people and other dogs. I would not have a dog with these behavior traits if I had not been able to use areas such as the GGNRA lands.

I sometimes see dog owners who do not have their dogs under control, but the vast majority of the dog owners I see are responsible. I oppose the compliance based management strategy because it penalizes dog owners such as me who have invested significant time and effort to make my dog's off leash access a neutral or positive experience for other people using the GGNRA space. I would support a policy that requires dog owners using GGNRA space to attend and pass obedience classes. I assisted in such classes while volunteering at the SPCA and would volunteer my time for such a project.

I sometimes walk my dog with friends who live south of San Francisco, and we struggle to find off leash parks outside of the San Francisco areas. I donate to the World Wildlife Fund, but I also support the need for people to enjoy outdoor space.

Thank you for considering my comments.

Celia Saino San Francisco, CA

Correspondence ID: 4159 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 22:38:22

Correspondence Web Form

Type:

Correspondence: I am in favor of the plan that provides the most restriction of dogs in the parks.

Over the years, I have seen the huge increase of dog owners believing that it is okay for their dog to be off-leash, no matter what the dog does. While walking in the headlands, I feel helpless as some off-leash dog meets me on the trail--all I can do is hope the dog will leave me alone, because the owner is often way behind, and out of sight. I have seen many owners who, believing their dog is under voice control, stand helplessly yelling at a dog who is being destructive. I have long ago given up going to Muir Beach because so many dogs run around making it impossible to sit and enjoy the beach. It is unpleasant to have dogs running up to you, spraying sand everywhere, while the owner--if there is one nearby--simply says a breezy "Oh, sorry" and continues on their way. This happens more and more at Stinson, as well, as many owners don't stay in the "dog" section.

When small children are involved, all this gets more than annoying--I have had experiences where little ones are in tears with fright or injury" because of an off-leash dog. Once, while my small son sobbed with a bloody skinned knee, after being knocked down by a dog, the owner stood and told me, "Oh, he won't hurt anyone." I had to ask him to please call his dog.

Not long ago at the Community Center in Mill Valley, a loose dog defecated on the lawn where children were playing. I asked around to find the owner, who otherwise would not have known, would not have picked up after her dog. With so many pets in our area, this growing attitude that "my dog" is entitled to "run free" is just irresponsible, harmful, and, frankly, selfish and rude. Sadly the number of such owners is growing.

Owners of pets have the responsibility to provide space at home for the pet to exercise or the owners need to be willing to travel to a dog park or other designated dog area, or walk the dog with a leash. I have many friends who do this and their dogs are happy and healthy. The national parks belong to people. Please don't let them become an open invitation for selfish dog owners to create problems.

Correspondence 4160 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. It is not

based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

As a single female, I prefer to walk with my dogs. As a resident of San Mateo County, there are few places where I can walk my dogs without cement under our feet. Dog walkers are some of the best caretakers of our environment, do not exclude us and the resources we have to offer.

Sincerely,

Andrea Dion

Correspondence ID: 4161 **Project:** 11759 **Document:** 38106
Received: May,30,2011 22:41:41
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean,

I am writing to oppose the GGNRA's Draft Dog Management Plan because it doesn't address the recreation component in the GGNRA enabling legislation which it must maintain and protect.

One-third of San Francisco households have dogs. There are more dogs than children in the city. As a rescue dog owner, my dog is a living proof that off-leash dog walking in an unfenced area has benefited and solved most of the issues for which she was first given up to the shelter in the first place. Without these less than 1% of the GGNRA parklands available, my dog will suffer major setbacks in her rehabilitation of behavioral issues.

The Visitor Use/Visitor Experience part of the Draft Plan should address recreation in the affected environment as well as the impacts of recreation BEYOND just dog walking. To improve the baseline conditions, they must first be addressed so that there would be a basis for coming up with a solution.

Thank you for your consideration.

Sincerely, Tszsan Kathy Reichardt

Correspondence ID: 4162 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I am writing to comment on the GGNRA DEIS plan regarding dog management. I agree completely with the writers below. They have stated our case comprehensively.

Over the years we in the dog community have repeatedly commented, discussed, testified, written, lobbied, compromised, negotiated, and worked with the GGNRA to ensure fair and reasonable access to lands acquired with our help. We have raised money, volunteered our time, attended hearings, served on committees, and participated in negotiated rule-making in good

faith.

Most of this has come to naught.

If you really intend to handle this issue fairly, you would scrap the whole thing and start over. You would do so for reasons articulated clearly in the following documents:

Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group;

Unleashed Fury by Julie Walsh;

Letters from the SF/SPCA to the GGNRA dated July 13 and August 16, 2000, from Ed Sayres, the Executive Director of the SPCA at the time;

SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org;

Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11.

Thank you very much.

| | | | |
|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 4163 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 22:46:20 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I don't understand why this issue keeps coming up in this very divisive way. In Chinese, an animal is a "moving object" as opposed to inanimate things which are called "standing-not-moving objects". It is a basic physical need for dogs to be able to run about off leash freely in the parks at least several times a week, if not every day. It is cruelty to a dog to not be able to provide this kind of exercise for it. Children need also to be able to play in the parks without any fears. And of course native plants, animals, etc. need to be | | |

protected.

I've never been a guardian to a dog but in the four years I took my granddaughter to the park when she was a baby, then a toddler, I never saw any conflict between the above three concerns. On the contrary, one morning I saw a young mother with a toddler and a big dog, off leash in Mountain Lake Park (a medium-sized park in the Richmond District of San Francisco with a little lake, lots of birds, children and off-leash big dogs who do not restrict themselves to just the off-leash dog run) showing her little daughter how to pick up their dog's feces and dispose of it responsibly, then after thoroughly brushing the dog for a while, she gathered his combed out fur and placed the soft furry ball behind some bushes surrounded by trees. Noticing we were watching her, she explained with a smile: "The birds like the fur for their nests."

Although this may have been a special incident that represented support by one person for all three concerns, the needs of the dogs, the children and protection of other species, it is typical that most people enjoying this park sympathize with all three and do not feel they are mutually exclusive. We certainly never felt the three conflicted!

If there is a real concern about off-leash dogs "attacking" children in the smaller parks, one simple way would be to restrict off-leash dog walking during the hours when children most often play there such as from 9:00 a.m. to 5:00 p.m. That would be a restriction working people could easily abide by since that is the time they are usually at work anyway. It is usually before 9:00 a.m. or after 5:00 p.m. that they have time to walk their dogs. As for children, especially toddlers, I've never seen a child in the park before 9:00 a.m. or after 5:00 p.m.

With regard to protecting endangered species from off-leash dogs, you need only to prohibit dogs from running near their home areas. If they are "Cliff Swallows" or something like that, then prohibit the dogs from running around near the cliffs, but why prohibit them from running in the entire or most of the vast park?

All the laws and restrictions being considered for the dogs will impact most the poorer people who have dogs, those who do not have a back yard or a car in which they can drive the dog to some off-leash run area. The result of that will be more abandonment of dogs and more left in shelters who will then be almost inevitably euthanized. Why?! Just so that some may show off how much they "care" about children or the environment?

All these problems and suggestions for resolution have been brought up again and again. Why do we keep rehashing them? It's a waste of time and money. There are simple common-sense solutions, so let's work together on

implementing them!

Chin Chi (Ms) Former member (for five years) of the San Francisco Commission on Animal Control and Welfare

Correspondence ID: 4164 **Project:** 11759 **Document:** 38106
Received: May,30,2011 22:46:37
Correspondence Type: Web Form
Correspondence: My name is Reid Reichardt, and I am a San Francisco resident. I frequently visit Crissy Field, Ocean Beach, and Fort Funston with my dog. Any restrictions or reductions on my ability to walk my dog off-leash in these areas would have a significant impact on my life. She is a high energy rescue dog that had numerous behavioral issues when I adopted her. Vigorous off leash exercise has been the most important component of keep her anxiety, aggression, and behavioral issues under control. There is almost nowhere left on the SF Peninsula to run a dog off-leash. Dog play areas are too small to promote comparable exercise. Furthermore, my exercise and well-being are limited by the limited placed on my dog. The GGNRA (in the DEIS) has not adequately investigated the impact that its plans will have on the human community surrounding the GGNRA lands.

Correspondence ID: 4165 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy.

Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

The presence of dogs and dog owners enhances a public space and helps keep it safe, friendly, and vibrant - people walking dogs are often the most committed, regular users of public green space because dogs need exercise in any weather. Please allow dog owners and dog walkers to continue to enjoy these public spaces together with their dogs.

Correspondence ID: 4166 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:47:40

Correspondence Type: Web Form

Correspondence: I do not believe that there is adiqute scientific data to support many statements throughout this report. In order to properly determine the effects of eliminating off leash exercise areas to numerous parks across the GGNRA we should know how many dogs visit these parks and the freqesncy. Also if the alternatives are implemented where will thsesse dogs and their owners go. Where is this data? How can we determine no impact to the surrounding parks and community without this data?

Justin

Correspondence ID: 4167 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: May 30, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean,

I am a resident of the Buena Vista Neighborhood Association in San Francisco. Following my mother's example I have throughout my life contributed to Parks and Recreation, and Environmental causes. I established the Eleanor and Standish Meacham Jr. Park Trust for the Greater

Cincinnati Foundation, and am a member of several environmental groups: Natural Resources Defense Council, CA League of Conservation Voters and the Save Our Springs Alliance. For the past five years I have volunteered as a gardener in San Francisco's Buena Vista park. I am a senior citizen and for exercise and recreation, I walk with my canine companion "Hannah" at Fort Funston and Chrissy Field.

I strongly disagree with GGNRA's preferred alternative plan which would effectively eliminate my recreation in the GGNRA and relocate it to my interior city parks. Clearly the proposed changes to the 1979 Pet Policy and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. A multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction. The DEIS must include such an alternative as a reasonable option. The proposed "compliance-based" approach punishes me and many others for the perceived transgressions of a few. It is a set up for failure and must be modified to reflect current conditions and must measure impact vs. compliance. The GGNRA must partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA my city's beloved treasure. San Francisco is a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment." But the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for me and other local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan must be modified to provide improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Sincerely,

Standish Meacham San Francisco, CA 94117

cc: Congresswoman Nancy Pelosi Senator Dianne Feinstein Senator Barbara Boxer State Assemblymember Tom Ammiano State Senator Mark Leno Mayor Ed Lee Supervisor Scott Weiner

ID:

Received: May,30,2011 22:48:25

Correspondence Type: Web Form

Type:

Correspondence: I feel the Golden Gate National Recreation Area is an asset to nature lovers and pet lovers alike and we can coexist in the park. However, I feel that leash laws should be enforced and dogs should be leashed in all areas of the park that are designated natural areas where habitat restoration occurs or wildlife breed. Crissy Field is an example of an appropriate place to have dogs off leash, where there are no native plants or wildlife. I have frequently seen dogs running through habitat restoration areas destroying the plantings and these plants cost money to grow and it can be a financial loss to the Park Service, the Presidio Trust, and the Golden Gate National Parks Conservancy. I also feel that professional dog walkers should be limited to the number of dogs they can walk at one time to 6 because with more than 6 dogs they become very unmanageable which makes dogwalkers more inclined to let them all off leash.

Correspondence ID: 4169 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 22:48:42

Correspondence Type: Web Form

Type:

Correspondence: (Reid Reichardt / City of San Francisco Resident) The DEIS's "compliance-based management" is severely flawed. First, there is no baseline from which to measure changes in compliance. Second, there is no requirement that there be evidence of negative environmental/social impact from non-compliance. I request that you remove the "compliance-based management strategy" from the DEIS altogether. It is unfair, as it gives the GGNRA power to punish the majority for the irresponsible actions of a minority. I suggest that you just give tickets, as is done in just about all other parks. Thank you, Reid Reichardt (San Francisco resident).

Correspondence ID: 4170 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 22:49:46

Correspondence Type: Web Form

Type:

Correspondence: The Preferred Alternate Plan for Crissy Field and Fort Mason fails to consider 1.) time of day, 2.) day of week, and 3.) season.

1. Time of Day. During morning and evening hours there are often more people walking their dog than people without a dog.

2. day of week. During weekdays all day, the quantity of people at Fort Mason and Crissy Field is minimal. Dog restrictions on use during

weekdays is not warranted.

3. Season. During the cold, gray, raining, foggy months of the year the quantity of people at Fort Mason and Crissy Field is minimal. Dog restrictions during the wet season is not warranted.

As a comparison: At the beaches of Orange County there are some restrictions ("blackballed" times) on hard-board surfing, to protect bathers. The times of these restrictions are only the times when overcrowding warrants the restrictions. The restriction are placed only during the summer months, and only during mid-day hours, and only at certain crowded beaches.

Also, The City of Del Mar has a time-based policy on off-leash dog walking on Del Mar's beaches: Restrictions are increased in Summer, and decreased in Winter.

At Crissy Field or Fort Mason, if restrictions are to be placed on off-leash dog walking, these restriction should only be put in place during the days and time when overcrowding warrants it.

In my opinion, the only times Crissy Field or Fort Mason warrant any off-leash dog restrictions, would be during the weekends, and only between 11 - 4 p.m., and only in specific verified overcrowded locations (the air-strip at Crissy is never over crowded) I know this because I walk my Dog at Fort Mason or Crissy Field every day.

Correspondence ID: 4171 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:51:16

Correspondence Type: Web Form

Correspondence: (From Reid Reichardt ? a San Francisco resident). The current Preferred Alternative is unreasonably restrictive, given that no data has been provided to justify such drastic measures. The only "data" present in the DEIS seems to have been selectively chosen by the GGNRA to support it's desired outcome. The GGNRA seems to have worked closely with environmental groups who support the same outcome. Many of their opinions and suggestions are based on speculation. The report by Nina Roberts ("Visitor/Non-Visitor Use Constraints: Exploring Ethnic Minority Experiences and Perspectives") appears to have been funded by the GGNRA. The DEIS references data from that report to argue that certain minorities will benefit from the elimination of off-leash dog walking. But the GGNRA appears to have made no attempt to quantify impacts on minority dog owners who visit the parks with their dogs on a regular basis.

I request that all current "data" in the DEIS be investigated by a third party audit, research, and legal review. I request that such entity oversee re-collection of data in a more balanced and objective manner.

Correspondence ID: 4172 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. I have a degree in ecology and my first job was as an intern for the GGNRA at Fort Funston. I wanted to give you this information so you understand my commitment and knowledge of the ecosystem and plant community at Fort Funston. The current plan seems to blame dogs for all the damage and harm that comes to the native ecosystem life living there. This is false as anyone who works there or has worked there should be aware of. The real damage that you can see is the non-native invasive species such as ice plant, grasses, and other weeds which out compete the native species such as bi-color lupine, indian paint brush, and others that give our home part of its unique beauty. When I worked at Fort Funston in 1998, the GGNRA was able to restore two parts of the park. Both of these are thriving with native species and have not suffered damage from recreational use by the public or their pets. These remain to date the only parcels of land which have been restored and with budget cuts ending the visitor center and native plant nursery, I don't see much hope for future restoration projects. This land can and should be used for the enjoyment of the public including those with dogs, as well as for native species of the area. There are so many places dogs are not allowed, the GGNRA has been a shining example of management of to accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from

recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Please think and rewrite this plan to maintain it as a place where people and their pets can go to enjoy themselves. Thank you, Abigail Suter

Correspondence ID: 4173 **Project:** 11759 **Document:** 38106

Received:

May,30,2011 22:53:12

Correspondence Type:

Web Form

Correspondence:

(Submitted by Reid Reichardt ? San Francisco resident). The DEIS does not recognize that the GGNRA has a recreational mandate. To the contrary, the DEIS reflects an National Park Service agenda of trying to severely restrict recreational use of the GGNRA lands. Walking my dog off-leash at Crissy Field, Ocean Beach, and Fort Funston have been some of the most cherished memories of my life. I would have to drive over a hundred miles to find any comparable experience, which is not a reasonable commute distance for regular recreation and exercise (my exercise is often limited by the limitations place on my dog).

I would like the DEIS to be amended to evaluate the physical and mental benefits of such recreational opportunities, and quantify the impact that all aspects of the plan will have on the residents of San Francisco. Recreation, including off-leash dog walking, was an integral component of Congress's original intent for the GGNRA lands.

Correspondence ID: 4174 **Project:** 11759 **Document:** 38106

Received:

May,30,2011 22:54:32

Correspondence Type:

Web Form

Correspondence:

(by Reid Reichardt ? San Francisco resident) The DEIS does recognize that the GGNRA lands are located in an urban area. And it does not recognize that the human community relies on the GGNRA lands for recreation and exercise. Approximately 1/3 of San Francisco households own dogs, a significant fact that the DEIS also does not mention. The GGNRA has made almost no attempt to study the impact that the DEIS will have on the residents of San Francisco and the Bay Area.

I request that the DEIS be amended to address this issue of impact on the local human community. I request than a neutral 3rd party agency be hired

to perform the necessary research.

Correspondence ID: 4175 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:54:49

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022 Dear Mr. Dean,

I have lived in San Francisco since 1996. I have owned a dog for six of those years. Yet I can honestly say that I've spent more time at Crissy in one year with my dog, than I ever spent in the entire span of nine years when I was not a dog owner. I am a busy professional, who lives in Russian Hill and works on average 50+ hours a week. My near-daily morning, and sometimes evening, ritual has been to drive my dog Stinson (named after Stinson Beach) to Crissy Field for some combined exercise. I am not a gym person, so Crissy offers me the opportunity to double-dip exercising myself and my dog. The dutiful "Chuck It" comes out, and my dog and I walk the length from the Warming Hut to the East Beach and back. Most weekday mornings, I see the same joggers, walkers and dog owners. I encounter less than a dozen people. We wave, or say "Good Morning" and there is satisfying comfort in the routine. Not to mention the fact that it's a stress-reliever for everyone involved.

Even in the evenings, and on weekends, I cannot recall ever witnessing an 'incident' of a dog biting a human, or disrupting a person's enjoyment of the recreation area. This is the pattern of usage at Crissy which is real and evident to me.

Nothing evidences to me that the use of Crissy Field is unbalanced, nor do I feel these issues of "unbalance" have been concretely stated or specifically cited in the the GGNRA DEIS for Crissy Field. As you may or may not have experienced, Crissy is subject to San Francisco's brutal west wind and fog in the spring and summer, and waterlogged field conditions with the winter rains. There is limited demand by locals and tourists for these natural resources until days when we are blessed with dry, windless (and if we're lucky, sunny & warm) days. The exception is possibly dog owners, who you will find recreating with their pets, rain or shine. Use of this water-front recreation area is a liberty that is not taken for granted by us.

After reading the documents which have been published for comment, I am in support of the No Action Alternative "A": What is really driving these decisions and massive time & effort? One can only speculate it's deep pockets??

Crissy Field is a cherished gift. It's more a benefit to me, than probably my dog to be able to recreate together. But one thing is clear: Crissy is not a National Park in the sense as Yellowstone, or the normal NPS areas. It's a recreation area, and to deem it a Park with strict limitations for humans, dogs, and cyclists ? the very people who love it and appreciate it daily - would be criminal.

Thank you for your time.

Sincerely,

Carolyn Suh

CC: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Correspondence ID: 4176 **Project:** 11759 **Document:** 38106
Received: May,30,2011 22:55:57
Correspondence Type: Web Form
Correspondence: (Submission from Reid Reichardt ? City of SF resident). The DEIS is full of assumptions and speculation about negative impacts that off-leash dog walk could or might have. But there is no documented data to support any of them. The DEIS presents no solid evidence of negative impacts that have occurred. This is not science. I have never seen a dog attacking a wild animal on the GGNRA lands. While it's obvious that the growth in human population has had a negative affect on the natural environment of San Francisco in the last 200 years, it's unfair to now blame off-leash dogs for such human impact. In fact, dog owners and walkers seem to be some of the more environmentally conscious and concerned members of the community. If a dog is observed to be harassing wildlife, that irresponsible owner should be given a ticket/fine. But why punish an entire human population based on biased speculation about what might happen if dogs are allowed off-leash.

I request that all statements of speculation and assumption, those without supporting data, be removed from the DEIS.

Correspondence ID: 4177 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. ? Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input. These are my personal comments and observations regarding this plan: I have lived in the Bay Area since 1979 and walk several time a week with my own dog in this area and it is a vital resource for all people as well as dog owners in San Francisco. We use it to exercise, socialize and as part of our routine. Our dog walkers also use this area for exercise and are responsible in this use of the area. Without this resource city parks will be over used and without the daily positive interaction of walkers, dogs, and people in these areas they will fall to the use of lawless and negative uses as they were before they were part of regular urban recreation.

Sincerely, Karen Brungardt San Francisco, CA 94116

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| Correspondence ID: | 4178 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 22:57:25 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | (By Reid Reichardt ? City of SF resident). While speculating that off-leash dog walking presents safety issues, the DEIS does not adequately recognize | | |

the hard data that serious dog-related safety issues account for just 2 percent of the GGNRA's reported safety incidents. The GGNRA also did not consult any professional dog behaviorists in writing the DEIS. In fact, dogs who are restrained by leashes are much more likely to suffer from "leash reactivity" and "barrier frustration" that leads to aggression, dog fights, and dog bites.

I request that the DEIS be amended to include testimony, data, studies, and recommendations from professional dog behaviorists.

Correspondence ID: 4179 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:58:45

Correspondence Type: Web Form

Correspondence: The DEIS does not recognize the sense of community that off-leash dog walking brings to the diverse Bay Area community. Walking at Fort Funston I encounter people of just about all ethnicities, social classes, and orientations, brought together by their interest in socializing their dogs and enjoying the outdoors. I have never seen any kind of altercation like I regularly encounter in other City environments. Off-leash dog walking fosters a very special sense of community, which the DEIS will destroy.

I request that the DEIS be amended to study this historically significant community that has evolved in Fort Funston and other pockets of the GGNRA lands.

Thank you, Reid Reichardt (San Francisco resident).

Correspondence ID: 4180 **Project:** 11759 **Document:** 38106

Received: May,30,2011 22:58:56

Correspondence Type: Web Form

Correspondence: I was walking in a Bay Area park today on a beautiful rocky narrow trail. It was posted for no bicycles, but there were bicycle tracks and a little erosion. I was thinking about the similarities of mountain-biking and walking dogs in open space areas. They are both recreational activities beloved by people that have the potential in the wrong place and time to do damage or cause injuries. How would they deal with the bicycle riding in the wrong place? They would never close the entire park to bicycles, including fire roads. They might put up additional signs, or erect barriers, or if there were resources increase patrols. They would not ban it in the entire region. I feel as if the goal of the GGNRA from the beginning has been to ban off-leash dog-walking. The proposal is for the most restrictive option, and this is very important, for the entire elimination of off-leash walking in the future with no further discussion. I do not understand why dog-walking is not viewed as

a valid recreational activity. There is no other activity where the plan is to ban it entirely if someone breaks the rules. When many people and dogs are restricted to a small crowded area, it is inevitable that some problem will arise. Walking the dog is an important activity to so many people who are older and socially isolated. I was recently reading about how the population of San Francisco is greying and I do not understand why this is not valued. I feel that it has been clear since the beginning of this process that the goal is to eliminate off-leash dog walking. It makes me wonder why nearly the entire coast from Pt Reyes to the middle of the San Mateo peninsula has been given to the federal government to manage.

Correspondence ID: 4181 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:00:13

Correspondence Type: Web Form

Correspondence: The starting point for this document is flawed. The existing laws and regulations need to be regularly enforced and then the resulting environment studied prior to determining the goals and scope of the dog management plan. I visit the GGNRA parks nearly 3-4 times a week and never see rangers providing education to the public about current park rules and regulations (providing this education is required in the document that gives the land to the GGNRA), enforcing dangerous dog laws, voice control or poop pickup. We have these rules for a reason and those of us that have well behaving off leash dogs should not be punished for the failings of a few. Why has the GGNRA neglected to supervise these parklands and then assume to be able to write a report that creates more restrictions and require more enforcement without doing any studies to try and understand the community that uses the facility and cares for it?

Correspondence ID: 4182 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:00:16

Correspondence Type: Web Form

Correspondence: To whom it may concern, Thank you for all of your hard work in creating this draft plan, but I must respectfully disagree with your plan as it stands. For the past 20 years I have been walking up Sweeney Ridge with one of the several dogs I've owned in that time period, along with my wife, children, parents, family, and friends. It is fair to say that I have climbed up Sweeney Ridge literally hundreds and hundreds of times - almost never without a dog. Hiking with the dog(s) along is the reason we climb that ridge trail - dogs are experience enhancing companions, not just for the family walking the dogs, but almost always for the other visitors. Often I see the same families walking their dog(s) and it is consistently a respectful and friendly encounter. I must also add that in the twenty years that I've been climbing

the ridge (with dogs), the trail and fire road has not degraded in the least, in fact, as an intimately familiar, close observer of the trail, I must say that it has improved over time. Honestly, I was rather shocked (and extremely disappointed) to see Sweeney Ridge on the list. Clearly having dogs on the trail has had virtually no impact on the environment. In fact, the trail couldn't be a more perfect opportunity to walk dogs in nature and have almost no impact, as the great majority of the trail is paved road. Please reconsider your pending restrictions on dogs on Sweeney Ridge. I believe that the regular users of the trail have a deep and abiding love and respect for the beauty of the Ridge and the opportunity to experience the outdoors with their pets. Granted a few people may have their dogs off-leash occasionally, but do you shut down a highway because a few people speed? It is the same argument. Visit the Ridge sometime and you'll be hooked. Ready access to the Ridge was one of the drawing points to moving to this area twenty years ago and hiking it continues to be the highlight of my day - in fact I plan to hike it tomorrow morning with my faithful dog Theo, as I did the day before yesterday. The canine therapy session is priceless - the natural beauty and joy of hiking and running with my dog renews my stores of love, joy, peace, and patience and allows me to be an even better teacher (I teach middle school), father, husband, and human being. We both are completely refreshed by the experience. It is truly a quality of life enhancing experience. So would I (we) continue to hike the Ridge without a dog? There have been several months (over the years) when we have been without a dog and the honest answer is no, we don't hike it without a dog. The dog is our personal trainer, not only keeping us in shape, but also helping us truly appreciate the beauty of the Bay Area. With the dog we are connected to our environment, experiencing the outdoors, and active as a family. He is our incentive, encourager, bond, and reward. Going for a hike with him in the hills above our home is central to our family life. Please keep it open to dogs. Please. Thank you. Sincerely, Charles R. Tinkham (and family - Joanne (wife), children Dan (20), Sarah (18), Ben (16) and dog Theo (3) - and in memoriam: Yukon, Toby, and Sam)

Correspondence ID: 4183 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:00:19

Correspondence Type: Web Form

Correspondence: (from Reid Reichardt ? a San Francisco resident) The GGNRA has skewed, misused, and selectively cited scientific studies to compile it's DEIS. The data mentioned to support protection of snowy plovers and bank swallows does not reasonably connect off-leash dog walking to the problem. If off-leash dog walking were in fact having a significant impact on the bank swallows and snow plovers, then I would request that the GGNRA fence off the sensitive environments. However, I suspect that off-leash dogs are not a significant source of the problem.

I therefore request that the GGNRA hire an objective 3rd party agency to research the true cause of the snowy plover and bank swallow issues, and to then suggest appropriate measures. That information should be incorporated into the DEIS.

Correspondence ID: 4184 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I have lived in the bay area for more than 20 years and walk in the GGNRA lands about one time per month. I am also a long-term volunteer with Grateful Dogs Rescue and some dog-walkers volunteer to walk my foster dogs at Fort Funston on a regular basis. Having off-leash walking areas is essential for conscientious dog-guardians.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for

these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Correspondence ID: 4185 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: I oppose the GGNRA draft dog management plan and all action alternatives that will reduce or eliminate dog recreation in the GGNRA. Honor the existing "1979 Pet Policy" and provide balanced off-leash options for new lands acquired since 1979.

Correspondence ID: 4186 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:02:28
Correspondence Type: Web Form
Correspondence: (Contributor: Reid Reichardt ? resident of San Francisco)

The DEIS makes no attempt to resolve the perceived issues caused by off-leash dogs, other than by restricting them. However, there are several more simple and creative solutions that could be applied with minimal effort. For example, extremely sensitive habitats could be fenced off. Literature could be distributed to explain the importance of preventing dogs from disturbing wildlife. A low fence and signage could be installed on dangerous cliffs for the protection of park visitors. As for the horse-riding community, a much more harmonious co-existence could be fostered if programs were provided to help socialize dogs and horses.

I request that a 3rd party agency/company be hired to provide the GGNRA with more reasonable alternatives than what the DEIS is currently proposing.

I also request that the DEIS be amended to include more such creative and reasonable solutions.

Thank you,

Reid Reichardt (resident of San Francisco)

Correspondence ID: 4187 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:03:09

Correspondence Type: Web Form

Correspondence: I have been a user of GGNR park lands in Northern California for almost twenty years, without a dog, and with a dog for just the last few months. As a windsurfer I have for years made considerable use of the beach at Crissy field in harmony with dog users. Having spent much more time as a user without a dog I believe I can impartially state that the dog use at any of the Crissy field areas has not posed a problem for me or anyone I know or have seen in the parks.

I am opposed to any additional restrictions on dog use within Crissy field or the Crissy field wildlife protection area.

I've seen that professional dog walkers at Fort Funstun have difficulty with voice command control given the number of dogs they are managing simultaneously. I would not be opposed to voice control restrictions on such users, but would be opposed to voice control restrictions on casual single dog walkers.

I do not have much experience with dogs at other ocean front areas (other than not having noticed any issues whatsoever). Given that I would not be opposed to restrictions on professional dog walkers as with Fort Funstun, but I would be opposed to the elimination of voice control at ocean front beaches.

I notice that much of the Draft Dog Management Plan claims dog restrictions are justified in terms of environmental impact. In the Crissy field area, it's clear that far greater environmental impact is being realized by projects such as selling off Presidio land to commercial enterprises, the widening of Doyle drive and connecting roads, and the expansion of park facilities at Crissy field (the Crissy field center).

I believe any environmental concerns in the Crissy field area should be focused on the above development projects, and on pollution, such as oil spills, from traffic in the adjacent shipping channel. Given the severity of the environmental impact from these commercial and industrial activities, I believe any attention being focused on dogs impact to the environment in the Crissy field area is entirely misplaced.

Bruce Cole

Correspondence ID: 4188 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:03:52

Correspondence Web Form

Type:

Correspondence: The GGNRA is a Recreational Area. I recreate by walking my dog in a responsible and respectful-to-others manner. It is a recreation. I have the same rights as joggers, walkers, people throwing the frisbee, etc., to use the GGNRA. There is little evidence dog walking is a significant nuisance to others, therefore further restrictions on off-leash dog walking is not warranted.

The GGNRA's proposals are taking my rights away without a strong reason!

Correspondence ID: 4189 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Web Form

Type:

Correspondence: May 30, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022
Dear Mr. Dean,

I am a resident of San Francisco. I am a long-time advocate for the environment and financial supporter of municipal Parks and Recreation. My advocacy and financial contributions include the National Aids Memorial Grove, San Francisco Parks Trust, New York's Central Park Conservancy, and Natural Resources Defense Council. I am a disabled citizen covered under the Americans with Disabilities Act and I walk my dog in my local National Recreation areas, Fort Funston and Chrissy Field.

I am writing to register my strong disagreement with GGNRA's preferred alternative plan which eliminates my recreation in my local National Recreation Area. The proposed changes to the 1979 Pet Policy and to the new lands in San Mateo County are based upon sloppy science, not long-term monitoring of site-specific conditions. GGNRA should consider reasonable and balanced alternatives for dog walking on new lands and existing lands. The natural areas of the GGNRA are located in one of the densest urban areas in the United States. I am concerned about the long-term preservation of the GGNRA's natural resources, but it must not compromise long-term established urban recreation in GGNRA's boundaries. In fact, rather than limit the minute portion of GGNRA that is currently open to dogs, the GGNRA should substantially increase the available recreation areas for me and my family.

I favor an approach that provides greater space for our recreational use (including dog-walking access) and also preserves our urban gem. One that expands dog walking access and incorporates education and physical or

vegetative barriers is preferable to further restriction of my use of GGNRA. The DEIS must include such an alternative as a reasonable option as we seek to open more of the GGNRA to the enjoyment of me and my family. The proposed "compliance-based" approach punishes me for perceived transgressions of a few. It is designed to fail and must be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA must partner with the community to make the plan work, not assume an adversarial relationship with failure the goal. The DEIS fails to consider that the GGNRA my city's beloved treasure. San Francisco is a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for me and other local residents. After careful consideration, I support a modified Alternative A (the "No Action alternative"). The alternative must also include the "New Lands" areas in San Mateo County. The current plan must be modified to provide, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. As I continue to examine the policies of the GGNRA, I vow to keep you advised of the flaws in the preferred plan and all further GGNRA actions. Sincerely,

Steven M. Salzman San Francisco, CA 94117

cc: US Representative Nancy Pelosi

Senator Dianne Feinstein

Senator Barbara Boxer

State Assembler Tom Ammiano

State Senator Mark Leno

Mayor Ed Lee

Supervisor Scott Weiner

Correspondence ID: 4190 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:04:11
Correspondence Type: Web Form
Correspondence: Dear GGNRA leadership,

"I know dogs can be such a distraction!" the lady with the large dog said with a friendly chuckle, a form of apology to several park visitors who were startled by the approaching animal. The people were doing tai chi in a grove of trees in the Presidio. The dog was off leash in an on-leash area. This happened several days ago.

Regarding visitor experience impacts, this brief incident sums up much of the problem being addressed by the new dog management plan. The plan makes it clear to everyone visiting the park what they can expect in a particular place. Here, dogs are allowed on leash (in a specific numbers per person). There, dogs are allowed off leash (with specific guidelines of appropriate behavior). Over there, dogs are not allowed at all.

Given the Presidio's nascent national parkhood, it's unfortunate that dog walkers have opportunistically established themselves as a primary park user. I can imagine the letter writing will reflect this, vs. the many would-be letters from those who have yet to become park users for reasons other than dog walking. After many years of active park-making the Presidio is poised to become a destination for many more people who have little or no relationship to this part of the GGNRA. However, in my experience living and working in the Presidio for more than 14 years, the ubiquitous and chronic presence of off leash dogs (and professional dog walkers with large groups of dogs) is now the most significant detractor from the quality of visitor experience the park faces. Needless to say, I'm gratified that the park is clarifying the rules on dogs in the park.

I'd like to emphasize that I am most concerned about the regulation of professional dog walking, namely the cumulative impacts of large numbers of dogs on wildlife, water quality and especially visitor experience. Please ensure that your plan addresses the following predictable scenario:

A group of schoolchildren visiting the park for the first time are walking on a park trail in a quiet natural area. On the same trail approach 3 professional dog walkers who are walking together each with 4 medium and large sized dogs, all on leash. The sum total of 12 dogs in the gauntlet of the trail results in contact with the children and the dogs. Some children are excited, some are nervous, all are distracted from their experience of the park. Given that this is a "first impression" visit to the park chances are good that those children now factor dogs into the equation of what a trip to (fill in the blank) part of the GGNRA entails. Does this inspire a return to the park?

When one considers the relatively small areas of the park that are accessible to recreation (i.e. trails and beaches) the near ubiquity of dogs means that an present experience in the outdoors in many areas of the Presidio and other parts of the GGNRA means an experience of dogs. In other words, whether

on-leash or off-leash the presence of dogs (sight, sound, smell, or evidence in the form of neglected dog feces to be avoided on trail or turf) is becoming a standard part of the character of the open space of the Golden Gate National Parks. This is not the national park experience that inspires the status of "America's Best Idea".

I strongly recommend the following:

7 require all off-leash areas be enclosed to protect park users, wildlife and other dogs;

7 limit off-leash recreation to areas where it will have no negative impacts on sensitive wildlife and habitats;

7 provide more trails that are free of dogs (currently, only 1 trail in San Francisco will be available for those who do not wish to interact with dogs);

7 limit dog walkers in the park to 3 dogs and do not permit commercial dog walking;

7 implement compliance-based adaptive management that requires at least 95% of dog walkers to comply with the new regulations.

Thank you for restoring order, wildlife protection and quality visitor experience to these extraordinary national park lands.

Gratefully,

Damien Raffa

Correspondence ID: 4191 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:07:08
Correspondence Type: Web Form
Correspondence: The GGNRA should be looking out for everyone's health, happiness and well being. By eliminating the walking of dogs it would be hindering my health; I'm 84 years old and am healthy and limber because I have my 4-legged friend and companion to accompany me on walks and easy hikes. Without him, I would not be walking as well or as much.

Correspondence ID: 4192 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:07:50
Correspondence Type: Web Form

Correspondence: What will the actual increase in users to the San Francisco City parks be? It is stated in this report that the impact will not be significant. What is this based on? How was this determined, what studies were done?

Correspondence ID: 4193 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Mr. Dean, I live in SF, have two kids and one dog. We've lived in the city for over 15 years but have never been so happy since we got our dog 2.5 years ago and discovered new places to get outside, enjoy nature, and exercise. when we travel out of the bay area, we're always shocked at the lack of good places to take children and dogs for off-leash hikes. At home, it's become part of our regular exercise program and when I heard that Fort Funston and Chrissy Field's off-leash areas may be changed, I was very upset and concerned.

So many of the areas the GGNRA Dog Management Plan are aimed at protecting are only regularly used by dog owners-not because of that causality, but because the only people who want to use those areas are dog owners. I want you to know that I am against the GGNRA's draft dog management plan. When I reviewed the plans, it is clear to me that it's not been reviewed by dog experts. For example, the proposal that the south beach ladder at Funston be strictly-on leash is not safe for dogs or people.

Furthermore, the report is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law. The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

* Honor the original 1979 Pet Policy. Respect dog-walking as legitimate

recreation. * Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. * Exclude speculative, exaggerated, biased, or misleading statements and studies. * Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). * Enable professional dog walking and align any professional dog walking rules with county or city regulations. * Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I urge you to consider the public's needs and input before implementing a plan that will discourage healthy outdoor exercise of people and their dogs. Sincerely, Joanna Schull San Francisco, CA 94110

Correspondence ID: 4194 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:09:06

Correspondence Type: Web Form

Correspondence: Thank you for the opportunity to participate in planning for uses of the GGNRA. I am a daily hiker at Fort Funston. I moved up to San Francisco in 2009 and, I have to tell you, the opportunity to walk my dogs up and down the trails and on the beach each day is a dream come true. I have lost twenty pounds since moving here and spending an hour to an hour and a half a day hiking up and down those hills!

This is also where I have found friendship in San Francisco. I am sure you know, you must frequent the place yourself, that many of us who use Funston are in our later years. Thanks to my daily treks at Funston, I had places to spend the holidays this past year.

In 2008, I spent the summer studying in London. I walked through Hyde Park every day and was surprised to find dogs are allowed to run free throughout the park (they do have warning signs by the swan pond - don't want the dogs to get sick). Regents Park (including Primrose Hill), James Park - all were off leash for the dogs.

When I came back from London, I kept bringing up the freedom dogs experienced in the Queen's parks. That is how I found out about Fort Funston. So I moved. 100 miles north from Santa Cruz, so I could run with the dogs. Some run with the bulls, I run with the dogs!

Please allow us urbanites the opportunity to run with the dogs in this wide

open space. It is the perfect dog park.

Thanks for listening, Chris Quinn

Correspondence ID: 4195 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:10:19
Correspondence Type: Web Form
Correspondence: To Whom It Concerns,

I am a senior citizen, a retired college teacher (30+ years in San Francisco) and have lived in the SF Bay area for 37 years. Currently, I live with my husband and a 7 1/2 year old dog. We are completely responsible for our dog and her behavior at all times, including always picking up her feces and controlling where she goes.

One of her favorite places in Crissy Field. She also like the trails and beaches on the Marin side of the GGNRA. Her pleasure in going to these places and running around is a wonderful delight to witness. It is a health-booster for her and for me. Off-leash, she has never damaged anything. She is within voice-command range at all times, in fact, usually beside me. When I walk with her in a highly populated area or a location near a "control area", I put on the leash without fail.

It seems obvious to me that the proposed restrictions on dogs in U.S. National Parks (specifically, the Golden Gate National Recreation Area) are the result of highly exaggerated claims and assertions about dogs' behavior. In all the pages of that costly report, there is NO PROOF that dogs, on and off-leash, harm the land, people, and other animals. In fact, they don't ! Has anyone even looked with their eyes at how dogs use the GGNRA lands? Most people with dogs are good, conscientious citizens. Of course, there are the few "bad apples" as with any collection--people without dogs, bicyclists, and so on.

Considering the proposed plan and its severe restrictions, it's as if a small contingent of dog-haters are in charge of administering for the vast majority of people and it's totally absurd. It is, at the bottom line, undemocratic.

PLEASE do not let something as trivial as "pride or arrogance" prevent you from reconsidering this proposal. PLEASE be willing to face the reality that there are numerous responsible people with dogs and that these dogs are an integral part of our lives. The GGNRA should include dogs, along with their people. The basic facilities of a civilized human life have included dogs for thousands of years. Let's keep it that way.

Correspondence ID: 4196 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:11:19

Correspondence Type: Web Form

Correspondence: I live in Pacifica in San Mateo County. I walk my dogs at Mori Point and Fort Funston.

I oppose Preferred Alternative because it is too restrictive. There is no justification in the DEIS for major changes. Support formalization of 1979 Pet Policy PLUS off-leash access in San Mateo County and on new lands that the GGNRA acquires in the future. The GGNRA is in a dense urban area, yet the DEIS is written as if the Bay Area and its residents don't exist just outside its boundaries. This is an urban area, not a pristine wilderness. The DEIS ignores impact on residents or area resources, especially city parks if restrictions take effect. Note that the SF Board of Supervisors passed a resolution opposing the Preferred Alternative because of the lack of study of impacts on city parks. The DEIS does not consider impacts on the health (physical, mental and socialization) of people if dog walking is severely restricted. The DEIS also does not consider impacts on social communities of people with dogs at GGNRA sites of severe restrictions take effect. Walking is one of my primary sources of exercise, as a single female, I prefer to walk with my dogs. When the citizens of Pacifica and the surrounding areas raised money to purchase Mori Point, we did so with the understanding that it would be preserving that land for our current recreational uses. On and Off leash dog walking has always taken place at Mori Point.

Thank you for your consideration,

Andrea Dion Pacifica Ca 94044

Correspondence ID: 4197 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:11:23

Correspondence Type: Web Form

Correspondence: With all due respect, the plan that the GGNRA wishes to accept for all new lands has so many flaws, it is hard for me to write them down. Many of my neighbors have already pointed these out to you in many forums (alongside myself) including these comments that you want filed officially in writing (as a point of clarification, I have come to four open houses and comment forums but still feel that you are not truly listening to any of the community's comments).

The bottom line is, you are acting prejudicial against dog owners. Dog

walking is a recreation, and yet it is the only recreation you are trying to eradicate from your new lands, which is very ironic as it is many of the dog owners who have been the true docents of these lands for more than 30 years and have saved the Rancho Corral de Tierra from development from groups like CalTrans

I fully support a Recommended "Hybrid" Alternative: Instead of the GGNRA's preferred alternative D for New Lands, i.e. "No dog walking allowed unless opened by GGNRA Compendium, " we recommend a modified version of Alternative A, No Action. New Lands, however, do not fall under the 1979 Pet Policy or the GGNRA Compendium, and therefore existing uses, including off-leash dog walking, should continue to be allowed until scientific studies prove that they are harmful to the environment.

Supporting this is the only action that is morally responsible on your part, and I believe that the GGNRA - which is responsible for NATIONAL RECREATION AREAS, not National Parks, yes, you are part of the NPS, but your mission is to provide recreation areas - this does include dog walking.

Hilary K. Srere, Ph.D.

Correspondence ID: 4198 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:11:33

Correspondence Type: Web Form

Correspondence: I am 77 years old. I have been walking my dog(s) (at one time i had 2 miniature schnauzers) in GGNRA territories since before GGNRA existed. (Thank god for the Burton bloodline.) A major purpose of the establishment of such a wonderful entity is to provide recreational activity opportunity - for people. All the data show that SF has lots of people and lots of them have dogs. Also, they show that it is a healthy connection to have a pet, even a dog. I have attended numerous mtgs over the years re: dog off leash issues. I am now old and jaded.

I miss being able to walk a dog south of Lincoln (dont get me started on south of the Beach House) off leash. In the olden days, after work at UCSF I walked the 2 schnauzers from Lincoln to Sloat as long as there was daylight. I retired from UCSF in 2001 and walk with my dog about 4 miles a day. Our walks are not limited to GGNRA land, but Ft Funston, Crissy Field and Ocean Beach account for about 16 miles a week.

It is healthy for people and for dogs and thus for society to have space for both to meander off leash. I am so tired abt the rules of the NPS not

permitting such behavior: the local NPS should look into its soul, get a life on this issue , admit it is OK to rethink and stop attempting to strangle some really good, beneficial behavior.

Mary Kahn

Correspondence ID: 4199 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:11:45
Correspondence Type: Web Form
Correspondence: Why were no other areas in the rest of the GGNRA studied for the possibility of off leash dog walking? It seems like if you remove them from one location they should be replaced somewhere else. Why was expanding dog access not an option?

Correspondence ID: 4200 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:12:42
Correspondence Type: Web Form
Correspondence: Hello,

I live in Marin City and strongly support the leash restrictions.

The trail a couple of blocks from my house, Alta, has for years been used heavily by dog walkers who arrive with a large number of dogs and allow them to roam off-leash. I love dogs, however the sight of a large pack of off-leash dogs coming towards me frankly makes me nervous. Once, I was completely surrounded by barking dogs while carrying my baby. The dog walker, in the distance, called the dogs, but they were slow to obey.

My husband avoids the trail now, too, since an off-leash dog bit him.

We miss being able to enjoy that beautiful ridge -- the one we were so excited about when we moved to the neighborhood.

Another time, I was walking on the nearby Oakwood Valley Trail with a friend and her 9-year-old son. Unfortunately, we encountered numerous large off-leash dogs, which made for a terrifying experience for the boy, who had also been bitten when he was younger.

I hope a solution can be found that works for everyone -- human and canine. But it should be possible for people to walk on public trails without fear of close -- and possibly dangerous -- encounters with dogs they don't know.

Sincerely, Jennifer Diessel

Correspondence ID: 4201 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:12:43

Correspondence Type: Web Form

Correspondence: 1. The Agreement that GGNRA originally entered into with the City of San Francisco stipulated that the City would have ultimate control over certain areas and that dogs & dog lovers would be able to enjoy those areas unhampered by leashes. Any change to this Agreement represents a breach of faith and a breach of contract-presumably actionable. (Must we go this route?)

2. Any attempt to make GGNRA areas off limits to unleashed dogs (except for areas enclosed for habitat restoration & for the safety of the dogs, say, from traffic) will ultimately put unbearable pressure on City parks-particularly Golden Gate Park. This pressure would not just be on professional and semi-professional dog-walkers; it would be an unacceptable hardship on dog owners and their dogs (some of whom rely on dog-walkers), who would be crowded into fewer and smaller spaces, which would embitter the current pleasant social interactions between people and between dogs, and where parking is already a problem. Golden Gate Park is already approaching the breaking point. I urge you to refrain from dealing the final blow.

3. If you've ever personally spent time walking in the Ft. Funston area or Ocean Beach or any number of open spaces, you would see, as I have seen, a lovely and serendipitous mix of dogs running free and parents with children (or single parents on their cell phones as their toddlers run into the ocean), people flying kites, surfers, picnickers, joggers, yogis, lovers, the elderly out for a stroll, and friends playing ball. Perhaps you have not noticed the lonely, the grieving, the disabled, the mentally ill-all of them finding solace in nature and, many of them, in the curative powers of a pleasant exchange with dog-owners, dog-walkers, and dogs-open and free, easy and non-threatening. The loss of the opportunities for these interactions probably do have fiscal consequences for the City, as well as financial consequences to those require them, but certainly they have other, immeasurable consequences. Free animals are songs of praise to the Lord, and almost anyone who witnesses this feels a bit of Glory Hallelujah at the sight.

4. People need outdoor time, leisure, and spiritual/physical/psychological renewal in nature and in relationship with free, non-human, non-verbal creatures. Some require more than others, some contribute more toward it than others, but the ever-increasing enclosure or circumscription of Man's

spirit, space, and social opportunities, and the encroachment upon them by an unending stream of consumers and consumer items, has contributed enormously to the ever-increasing rates of mental illness, spiritual disturbance, and/or social unfitness that now characterize American culture. Note that 70% of the San Francisco Department of Public Health's budget is spent on mental illness and chemical dependency.

5. Dogs and dog owners have the right to live and enjoy in relative freedom (within certain bounds that respect, to some fair and reasonable degree, some of the desires, not all, of others competing for the same resources). We have the right to breathe air, take up space, and enjoy God-given nature; we are not here to make unlimited sacrifices to parents & children, birds who can easily fly away, Frisbee golfers, SUV owners, City coffers, etc., ad infinitum.

Consider any and all of the points that I have tried to make and please: Do not take away our off-leash areas!

Correspondence ID: 4202 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:14:00
Correspondence Type: Web Form
Correspondence: I wish to add my name to "Accept the Preferred Alternative" of the GGNRA Dog Management Plan. The increase of dog owners in the Bay Area over the last 10 years has been astounding and of course, with this change is the challenge of maintaining an all to stressed and underfunded Park system. The City and County parks bear the brunt of the dog and dog-walker activities, so the citizen who looks for an escape from the hardscape / urban scene must rely on the National parks for any hope for a moment to experience the natural world. The Park's Plan is long overdue in realizing the need for establishing stringent controls of our land we have set aside for that purpose.

The pet owners desire to share National park property with their animal, take away from those of us who want a chance of a different experience. Unfortunately, I've witnessed many of these occasions at our beaches, on trails and in meadows. I only wish the proposed plan, if adopted, could be adequately funded to be lawfully enforced. But, first things first!

Thank you, Barry Deutsch

Correspondence ID: 4203 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:14:46
Correspondence Type: Web Form

Type:

Correspondence: Dear Superintendent Dean, I oppose the GGNRA's current preferred alternative to restrict and in some areas eliminate off leash dog walking in the GGNRA. I am a San Francisco resident who volunteered for five years in the dog behavior department of the San Francisco SPCA. I adopted a puppy in October 2010, and I frequently visit Fort Funston and Crissy Field with him. When I adopted my dog, he was afraid of other dogs. I have taken him to an off-leash dog park every day since last October, and he is now a well socialized dog who obeys my voice commands and is friendly with people and other dogs. I would not have a dog with these behavior traits if I had not been able to use areas such as the GGNRA lands.

I sometimes see dog owners who do not have their dogs under control, but the vast majority of the dog owners I see are responsible. I oppose the compliance based management strategy because it penalizes dog owners such as me who have invested significant time and effort to make my dog's off leash access a neutral or positive experience for other people using the GGNRA space. I would support a policy that requires dog owners using GGNRA space to attend and pass obedience classes. I assisted in such classes while volunteering at the SPCA and would volunteer my time for such a project.

I sometimes walk my dog with friends who live south of San Francisco, and we struggle to find off leash parks outside of the San Francisco areas. I donate to the World Wildlife Fund, but I also support the need for people to enjoy outdoor space.

Thank you for considering my comments, Daniel Ratner, San Francisco, CA

Correspondence ID: 4204 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

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

Dear Mr. Dean,

I live in Noe Valley with my 12 year old, very sweet, loving dog, Duff. We continue to enjoy visiting many parks and beaches throughout the Bay Area, as we have for the past 11 years together since I adopted her.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy)

and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I want to protect the GGNRA's natural resources, I believe options other than restricting dog-walking access should be considered first. I favor an approach that truly balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternatives as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based on any documented impacts of non-compliance, just the mere fact that non-compliance occurs. Because it will change the status of areas from off- to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur. That violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be. It must be removed.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") that codifies the 1979 Pet Policy as it was originally written (there is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers), and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking.

Thank you for your consideration.

Sincerely,

Brett Penfil (and Duff!) Noe Valley, SF

ID:

Received: May,30,2011 23:17:49

Correspondence Type: Web Form

Type:

Correspondence: I respectfully request that you throw the entire DEIS in the garbage.

You might be able to get away with providing deceptive options, and referencing junk science, in other communities. But there is intelligent life here in the San Francisco Bay Area.

You should be ashamed of yourselves.

Show some decency by abandoning your sneaky efforts now.

Thank you

Sincerely

Correspondence ID: 4206 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 23:21:06

Correspondence Type: Web Form

Type:

Correspondence: To Whom It May Concern, Thank you for the opportunity to comment. I think there should be at the least, sections of Fort Mason, East Beach, and Baker beach that are 100% NO DOG zones.

Thx Matt

Correspondence ID: 4207 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

As a dog owner and as a lover of San Francisco's parks and beaches, I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was

designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

I have visited GGNRA on numerous occasions with out of town visitors. Its the first place I take them, because of the wonderful view, the brisk air coming off the ocean, and because of the friendliness of the park to dogs and their owners. Loosing this space as a recreation area for my dogs, including dogs with professional dog walker, would significantly reduce my quality of life as a tax-paying San Francisco resident.

I urge you to reject the proposed dog plan, and let all of San Francisco's two-legged and four-legged residents enjoy this wonderful resource.

Sincerely,

Alan Brown San Francisco, CA 94117

Correspondence ID: 4208 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Web Form

Type:

Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely,

Pamela Morse

san francisco, ca 94122

Correspondence ID: 4209 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Frank Dean, General Superintendent, GGNRA

Dear Mr. Dean,

I am a native San Franciscan (60 years old) who lives in the Sunset district. I have been taking my dogs to Fort Funston for several years, at least four (usually five) mornings a week. We typically stay for about an hour and a half, hiking the trails and socializing. These morning treks are a very important part of the day for both me and my dogs, and I strongly oppose significant restriction or elimination of off-leash dog walking within the GGNRA. My opposition derives not only from my enjoyment of off-leash dog walking, but also safety concerns of having a lot of dogs who behave differently on leash in a confined area. Also, it seems doubtful that city parks could accommodate the overflow from GGNRA. From my understanding, the proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

I believe that it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of GGNRA's natural resources and want to protect these important areas (and have been a member of an environment group in the past), I believe that other options besides restricting dog-walking access should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I believe that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach seems to punish many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work and not assume an adversarial relationship, with failure as the

goal.

The DEIS fails to consider that the GGNRA is the "back yard" for a large metropolitan area. The basic purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on "human environment," but the DEIS fails to do so by not adequately addressing how the proposal affects "recreational" values for local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Sincerely,

Janine Marinos

Correspondence ID: 4210 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:25:11

Correspondence Type: Web Form

Correspondence: National Park Service: Yes, continue with your plans to protect the Golden Gate National Recreation Area by limiting (should be eliminating as in all other parks) areas for people running dogs. I served at the Presidio and have family in San Francisco so I have both a knowledge of the areas of the GGNRA and relatively long experience in them (hiking, visiting, working). As such, I can state that the areas have seriously deteriorated from both overuse and from dogs.

Most dogs are being run off-leash in all areas. The so-called guardians seem amused when their dogs chase animals, dig, run up to other people. The so-called "voice control"? Please! This is the favorite farce of the people running dogs. Some of the time, they cannot even see their dogs. I recently witnessed an incident on the Presidio at Crissy Field in which an unleashed (pretty much unaccompanied) dog chased a gull and in so doing galluped by a man in a wheelchair who was attempting to wheel down a slight slope. As the dog ran by, it bumped against the man's feet in the wheelchair, greatly startling him. No one was hurt, but we wondered if anyone was with the dog. After about 45 seconds, a man did appear who seemed, maybe, to be the dog's guardian. We could not tell as the only behavior indicating any relationship came from the dog, not the man who did absolutely nothing but ride by on his bicycle. By all means, yes, please, please control this out-of-

control homo sapien behavior.

Dog voice control is a ruse and a farce. The type of control required is not of the dogs, but of the homo sapiens. Dogs might require voice control, but people obviously require legal control. The problem is not dogs but people out of control. Since no amount of personal responsibility has worked, legal control is warranted. Do it. Henry Lowry

Correspondence ID: 4211 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I am writing to comment on the GGNRA DEIS plan regarding dog management. I agree completely with the writers below. They have stated our case comprehensively.

Most of this has come to naught.

If you really intend to handle this issue fairly, you would scrap the whole thing and start over. You would do so for reasons articulated clearly in the following documents:

1. Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group;
2. Unleashed Fury by Julie Walsh;
3. Letters from the SF/SPCA to the GGNRA dated July 13 and August 16, 2000, from Ed Sayres, the Executive Director of the SPCA at the time;
4. SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org;
5. Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;
6. Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;
7. Preserve Recreation for Dogs and people in the GGNRA: Public Health

and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11.

Thank you for your consideration.

Correspondence ID: 4212 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. I believe the plan will have a negative impact on the residents of the City of San Francisco, as it proposes extremely restrictive policies about where we will be able to enjoy off-leash hiking, running and other recreation with our pets.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily ignores the needs of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

In my opinion, the GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area--and it IS an URBAN recreation area--not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. I have also observed that when people and their families walk with their pets, they are more open to meeting other people, usually via inquiries about their pets. They also grow to appreciate and value our beautiful open spaces in a way that they would never have done if they were not out walking their dogs.

The GGNRA draft management plan does not provide tangible evidence that justifies such drastic changes to 40 years of healthy dog and human recreation. The Park Service should honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Recognize that there are hundreds of uninhabited miles along the California coastline for wildlife to thrive, while we San Franciscans and our pets have a 7 x 7 mile peninsula on which to recreate. Please do not adopt the proposed regulations, but rather, honor the 1979 Pet Policy.

Thank you for your time and consideration.

Sincerely,

Sophie Ziegler San Francisco, CA 94110

Correspondence ID: 4213 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Type:

Correspondence: May 30, 2011

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

RE: GGNRA DRAFT DOG MANAGEMENT PLAN / ENVIRONMENTAL IMPACT STATEMENT

Dear Superintendent Dean:

As the State Senator representing the 8th District in California, which includes much of the Golden Gate Natural Recreation Area (GGNRA), I am writing this letter of public comment as a reflection of my constituents' concerns.

As a general principle, I understand the need to address the difficulties the GGNRA has encountered in managing the area and balancing the interests of preservation and recreation. Given the long history of controversy, I am supportive of the effort to modernize the GGNRA's management policy so as to best protect sensitive lands and species and balance this with recreational use of the area.

I am interested in resolving the issue in a way that collaboratively considers both environmental and recreational factors. I believe a balanced final resolution reached through collaboration is an important goal not just as a matter of policy, but as a key peacemaking tool in resolving this historically emotional and hotly debated issue in San Francisco.

I have two significant concerns with the GGNRA Draft Dog Management Plan/Environmental Impact Statement (hereafter "draft plan") that I believe should be addressed in the GGNRA's revised plan.

1) Compliance-Based Management and Public Comment Based on constituent concerns and on information obtained through stakeholder meetings, I am concerned the compliance-based management strategy does not yet a) include a proposed system monitoring and implementation, or b) adequately incorporate the principles of public involvement and comment in policy changes. Compliance with the eventual final version of the plan will undoubtedly be difficult; however, an open, transparent, collaborative approach will ultimately create far better results-better strategies, better

compliance, better protection of sensitive species and habitats, and better community relations. A heavy-handed approach, or even the perception of such, will only perpetuate the current controversy-and it appears the lack of a proposed implementation plan for the compliance-based management proposal has already created that effect. The GGNRA must go through an open, public process with stakeholders to construct that plan for compliance management, and I encourage the GGNRA to further consider alternatives to the current compliance-based management proposal that would better incorporate public collaboration in assessing and improving compliance outcomes.

2) Consideration of Impact on City Parks The draft plan does not adequately consider or evaluate potential impacts on city parks. Rather, the draft plan appears to concentrate on economic factors such as impacts on nearby businesses and commercial dog walking, while grazing over potential changes in park use behaviors and the effect on city parks. The ultimate conclusion that the "potential impacts on social and economic conditions [in San Francisco] would be highly unlikely to exceed a 'negligible' threshold, and are therefore eliminated from detailed consideration" (1) is incomplete and inadequate.

I believe the GGNRA is mistaken and misguided in its reasoning on this point, and that the impacts on city infrastructure should be fully evaluated and addressed in the revised plan.

It is reasonable to assume that potential consequences of dog management policies within one jurisdiction will indeed affect the other. The draft plan itself states that "visitation data on local visitors walking their dogs off-leash in the park are not available; however, reports from park staff suggest that use of GGNRA by dog walkers has been increasing as regulations limiting or prohibiting off-leash dogs in areas managed by other agencies have been increasingly enforced."(2) It must then be recognized that the same will hold true if the GGNRA itself limits allowance of off-leash dogs.

Limiting assessment of impacts on the city to the socioeconomic effects of changing spending patterns of visitors is shortsighted. The potential effects on the city extend far beyond that-specifically, the financial strain on city infrastructure to accommodate potential increased use of city parks. With over 100,000 dogs in San Francisco, there will be impacts-but without appropriate assessment, we cannot determine to what degree the city's infrastructure will be affected. Without that information, the City cannot adequately prepare itself to deal with or mitigate any impacts ? large or small.

It is not smart public policy to consider impacts of this proposal within silos of governmental jurisdiction. The public does not perceive the world

through federal versus local lenses, and public perception and buy-in are essential to a consensus outcome on this issue.

The only responsible action is for the GGNRA and the City to jointly assess the potential impacts and consider how best to holistically manage the potential migration of dog activity between the GGNRA and city parks. I respectfully request this be included in the GGNRA's revised plan.

Respecting The Process The most important and most useful tool in achieving the ultimate goal of a consensus resolution is a fair, open, transparent, collaborative rulemaking process. A collaborative problem-solving approach is indeed more difficult when there is a high level of disagreement amongst affected parties and stakeholders-but that is precisely why that approach is most necessary in order to achieve long term resolution. I appreciate that the GGNRA embraced that idea and attempted to go through the negotiated rulemaking process. While that effort was not successful, I encourage the GGNRA, in its ongoing efforts to be open, public, and fair, to continue to be as collaborative as possible as this process moves forward given the controversial nature of this issue.

I also encourage the GGNRA to extend that spirit of collaboration and work with the City to resolve this issue. The GGNRA, though federally operated, is a partner in the San Francisco community. To transfer responsibility of dealing with this problem to the city without assisting in an assessment of and plan to deal with it would be irresponsible and, more importantly, would not solve the problem.

Sincerely,

Senator Leland Y. Yee, Ph.D. California State Senate, District 8

(1) GGNRA Draft Dog Management Plan/Environmental Impact Statement, Vol. 1, p. 23. (2) Ibid, p. 23.

Correspondence ID: 4214 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:30:22

Correspondence Type: Web Form

Correspondence: Although I've already commented a couple of times, I have one last comment, especial y in light of my experience at Ocean Beach yesterday.

I was going to at least ask you to, if dogs had to be off-leash on part of the beach, to focus your "manpower" on the times that the dogs are the most likely to be there - early morning and after normal working hours. I no

longer think this is remotely workable.

I recognize that most dog owners are responsible. The problem is that there are enough dog owners on the beach who only care about their dog that it hurts wildlife.

Yesterday I went to the beach and saw one shorebird left. The beach was nearly empty of people, too. A man with a dog threw the ball almost directly at the bird, flushing it. When I suggested that he had the rest of the beach to throw the ball; it didn't have to be at the one remaining shorebird, his response was two-fold. The bird wasn't a plover, and his dog is allowed to be off-leash now.

There were Park Service patrolling but they can't be everywhere and they're very visible. It's too easy to carry a leash and put it on the dog when you see them coming, and watch your dog chase birds the rest of the time.

That incident yesterday wasn't about the dog getting exercise. The dog had the whole beach. It was about the owner wanting complete personal freedom no matter what the consequences to others.

I think the 75% compliance issue is a red herring. This means that 25% of the dogs can chase birds and the policy has to stay in place, and there are enough dog owners out there to have a negative. The birds are declining.

I'm sorry, but given some of the behavior I see on the beach I don't see how you can allow any off-leash dogs on the beaches and not impact the birds.

So, one last time I ask, please implement STRONG regulations. It's already been shown that nothing else works.

Thank you. I know that this whole process is difficult.

Correspondence ID: 4215 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: San Francisco League of Conservation Voters 937 Valencia St. ? San Francisco, CA ? 94110 ? www.sflev.org

May 30, 2011

Frank Dean, Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123

Re: GGNRA Draft Dog Management Plan/ Environmental Impact Statement

Dear Superintendent Dean:

We are pleased to offer the comments of the San Francisco League of Conservation Voters (SFLCV) on the proposed Draft Dog Management Plan/DEIS for the GGNRA ("the Plan"). SFLCV was an official participant in the Negotiated Rulemaking Advisory Committee for Dog Management in the GGNRA process, and we are pleased to finally see this management proposal. The GGNRA is an extraordinary unit of the National Park system and its rich and unique resources are imperiled by the current levels of off-leash dog walking in particular. This draft plan is a major step toward ensuring better protection for these resources for future generations.

There are many threats to the irreplaceable species, habitats and historic resources of the GGNRA. Some, such as climate change, cannot be stopped on a local level and can only be adapted to as best as possible. However, those threats that are within the abilities of park management to control and prevent must be addressed firmly and aggressively, as islands of species diversity such as the GGNRA are the best hope for the survival of what remains of the planet's rich and varied ecosystems. Unfortunately, for a variety of reasons, the use of this park for recreational off-leash dog walking is long past the point of causing serious damage to the very resources this park was created to protect. We are hopeful the final Plan will reverse this trend.

In these comments, we will provide more general overarching comments on the plan as a whole and then address the site-specific proposals in the draft plan. While our strong belief as an organization would lead us to support Alternative D for all situations (and there may be a few instances where we might suggest that Alternative D does not go far enough), we recognize ? as evidenced by our participation in the Negotiated Rulemaking ("Neg-Reg") process ? the necessity of some compromise. Those areas where we find some disagreement with the proposed Preferred Alternative tend to have a greater impact on the visitor experience than on the habitat, though not in all cases.

There are several general concerns we wish to note here:

? There was an agreement by all parties in the Neg-Reg process that park visitors who desired to have a "no dog" experience of the park should be able to do so conveniently. It is our belief that the Preferred Alternative does not meet this goal in all areas, particularly in the portions of the park within San Francisco. We would encourage further examination and expansion of opportunities for those people desiring an experience of the richness of this

park without encountering canines to be able to do so.

? While we have deep concern about the precedent-setting nature of the proposed Regulated Off-Leash Areas (ROLAs), we accept this inevitability. We strongly request, however, that the park find clear ways of physical separation of ROLAs from non-ROLA areas, preferably by means of a clear barrier. We are not asking for an impenetrable barrier ? in most cases, a post and cable fence as is used in many areas of the park already would be acceptable. On beaches, other solutions may need to be found. We are simply concerned that for there to be sufficient enforceability of these rules, boundaries between areas must be abundantly clear and not open to any question or interpretation.

? Commercial dog walking has been a source of some of the worst resource-damaging abuses of off-leash activity. We strongly encourage that it be banned within the GGNRA. There should be steep fines for violations above those which are levied on dog owners for violations. If commercial dog-walking is allowed, which we oppose, it must be strictly regulated and fair fees must be required.

? The entire success of this Plan lies in the concept of compliance management. If compliance management fails, these rules become meaningless, and we are not just back where we started, but worse. A 75% level of compliance is simply too lax to be meaningful, or even realistically measured. We strongly recommend that the compliance rate be 95%. Anything less will be ultimately ineffective.

? We were unable to find an analysis of one probable effect of dog activity on mammalian wildlife, either on or off-leash. Most mammals use the production of certain chemicals and their sense of smell to communicate substantial amounts of information. One well known way that canids, whether domestic or wild, communicate is through chemical secretions in urine. The awareness of scent marking in urination is not limited to other members of the genus *Canis*, but is clearly perceived by other mammals as well, be they potential prey like rabbits or other carnivores such as a bobcat. The daily presence (and urination by) tens to hundreds of domestic dogs in areas of natural habitat create a profound stressor on other native mammals, and should be noted in the environmental analysis. An unfortunate brush rabbit finding itself at Fort Funston would "believe" that it had landed in the wolf pack to end all wolf packs.

? Site-Specific Issues

Marin County

We find the proposed Preferred Alternative either desirable or acceptable in

the following sites, assuming the incorporation of our general comments above: Stinson Beach, Homestead Valley, Muir Beach, and Marin Headlands trails. In particular, we commend the protection of resources at Muir Beach, and the no dogs policy on the South Lagoon trail, Smith-Guthrie Loop, South Rodeo Beach and the Coastal Trail in the Marin Headlands.

Oakwood Valley Trail and Fire Road, Alta Trail, Orchard Fire Road and Pacheco Fire Road ? We support the Preferred Alternative treatment of Oakwood Valley Trail and Oakwood Valley Fire Road, with the construction of double gates enclosing the ROLA. We prefer the Alternative D treatment of the Alta Trail, Orchard Fire Road and Pacheco Fire Road because of habitat concerns. If sufficient means can be found to protect the Mission Blue butterfly habitat along these trails, we would find the Preferred Alternative acceptable.

Rodeo Beach ? we feel that many visitors who may desire a no-dog experience at Rodeo Beach would be unlikely to make their way to Muir Beach. This is especially true of park visitors taking advantage of bus transit from San Francisco that only brings people as far as the Marin Headlands and Rodeo Beach. Therefore, we would propose a compromise version of Alternative D: make the beach area north of the bridge a ROLA, and make the area south of the bridge a no dog area. We realize the "line of separation" on the beach would not be able to be clearly marked; however, since the primary beach access is over the bridge, signage can indicate which area is which very clearly, and would be relatively easy to monitor. We support the construction of the proposed fence around the west end of the lagoon in any case.

Fort Baker ? We generally support the Preferred Alternative, with the exception of Battery Yates Loop and Drown Fire Road. We believe the primary focus of this area should be protection of the mission blue butterfly habitat and that this area be off limits to recreation with dogs. .

San Francisco

We find the proposed Preferred Alternative either desirable or acceptable in the following sites, assuming the incorporation of our general comments: Fort Mason, Baker Beach and Ocean Beach. We believe the ROLA described in Fort Mason Alternative D would be acceptable if an adequate means of physical separation of the Laguna Green area could be identified. We are very pleased to see substantial areas without dogs on both Baker Beach and Ocean Beach. This is good for wildlife, vegetation and people

Crissy Field ? we support the Preferred Alternative here also, though, we note that this area will require more intensive ongoing management than

most. Compliance based management is particularly important here.

Fort Point ? This is one of several sites in San Francisco, as noted in the general comments, where we believe there is a decided lack of opportunity to have a "no dog" experience or to even avoid unwelcome approaches by dogs, given the narrowness of many of the trails. We support the Alternative D treatment ideally, or at least a reduction in the number of trails where dogs are permitted than shown in the preferred.

Lands End and Fort Miley? There is some confusion, as the "Preferred Alternative" map does not match the "Preferred Alternative" description. In either case, we would note that this is another location where it will be difficult to avoid uninvited interactions with dogs. We believe that enforcement will be challenging for any allowed dog use in East Fort Miley.

Sutro Heights Park ? The Preferred Alternative, which would allow on-leash dogs through the park (with one small exception), amplifies the problem cited at Lands End and Fort Point (and Fort Funston) ? that is, the inability to have a no-dog experience. This park is a unique unit of the GGNRA, and so provides an experience not available in other units. Because it is a developed site, the environmental impacts of dog activity are far fewer. Nonetheless, we would prefer to see a greater accommodation to those visitors who would prefer a no dog experience, which could include a number of people with physical challenges that would find it more difficult to visit other units of the GGNRA.

Fort Funston ? We appreciate that this is a challenging unit for the GGNRA, and find most of the Preferred Alternative acceptable, and a big improvement over the status quo. However, as in other units we have named, this again is a place that will not allow an experience free of unwelcome interactions with dogs. We would propose that the Coastal Trail north of the beach access, or even north of the drinking fountain, be no-dog. We also propose that the seasonal beach closure be year-round. Both of these actions still allow two large ROLAs and ample access to both, but would also greatly increase the ability of bird watchers and other visitors to enjoy the wonderful natural resources of this important park unit without the interruption caused by the presence of dogs.

San Mateo

We find the proposed Preferred Alternatives either desirable or acceptable in all the San Mateo GGNRA units, assuming the incorporation of our general comments. While again, we would prefer full resource protection, we believe the proposed Preferred Alternatives provide adequate accommodation for dog walkers and adequate options for visitors seeking a

no-dog experience, or at least a dog interaction that is not welcome.

We would like to once again express our appreciation for all the hard work that has gone into the preparation of these plans to manage dog walking activity in the GGNRA. We are eager for the impacts of previous lapses in proper enforcement and communications to diminish, and to see the park fully live up to its Organic Act mandates. We look forward to visitors seeking experiences that do not include dogs to regain access to some of the amazing portions of the park that have been less desirable to visit as a result of unregulated dog activity. We will be happy to work with park staff in the future to assist in any way with the further final adoption of these rules and their subsequent enforcement.

We offer these comments on behalf of the San Francisco League of Conservation Voters.

Yours Truly,

Amandeep Jawa President

Steven Krefting Primary Member Negotiated Rulemaking Advisory Committee for Dog Management at GGNRA

Michelle Jesperson Vice President Alternate Member Negotiated Rulemaking Advisory Committee for Dog Management at GGNRA

Correspondence ID: 4216 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

May 30, 2011

Dear Mr. Dean,

Please accept this comment in opposition to your proposed Dog Management Plan. I Have been a resident of the Outer Sunset/Parkside district for the last 10 years. I moved here specifically to be able to run with my dog on the beach. I wanted to be able to walk out my door and go running with my dog, surfing,and enjoy all that the beach has to offer. I recently bought a house in this area in order to maintain my lifestyle as an avid outdoorsman. It is a unique and wonderful setting to be so close to the outdoors in an urban environment. I am a daily visitor, not just once a day

but at least twice a day, to the beach. I have witnessed the constant revisions of restrictions for dog access on the beach and do not agree that limiting dog access to these urban coastal areas will dramatically change any purported environmental impact.

The DEIS report does not supply enough empirical evidence to support its conclusions.

The GGNRA was designed as an urban recreation area. The regulations of the National Park System do not readily apply. The courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. If this proposal is passed the surrounding areas will be negatively impacted. It is key to a dog's health and well being that exercise comes first. Ocean Beach provides a safe place for dog's to interact with their owners and their peers. One only has to look at the overcrowded shelters of dogs with behavioral issues due to lack of exercise and appropriate stimulation. Left to their own device in a backyard all day dogs become destructive to property, to themselves and potentially to those they encounter on the streets. I do not have any studies to cite but one only needs to visit a shelter, zoo or other place where animals are kept captive to see the result. The city streets will be filled with frustrated animals, leading to an increase in dog fights and dog bites. The surrounding parks and neighborhood streets are located near busy city streets. They are small confined spaces, overused, a haven for harboring infectious diseases.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers,

bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Cynthia Mott San Francisco, CA 94116

Correspondence ID: 4217 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: Frank Dean, General Superintendent

Golden Gate National Recreation Area

Fort Mason, Building 201

San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled,

minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely,

_Wells Campbell_____ (name)

_ _____ (address)

_San Francisco, CA 94122_____ (city, state, zip)

Correspondence ID: 4218 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: Lisa Vittori San Francisco, Ca. 94131 May 30, 2010

Dear Supervisor Dean:

I am writing to comment on the GGNRA DEIS plan regarding dog management. I write this letter as a formality.

A note: Whenever I refer to dog-walking, I am referring to dogs walking in cooperation with their people, sans leash. Well-behaved, responsible, off-leash dog/human companionship should be the default assumption in all comments I make.

Over the years we in the dog community have repeatedly commented, discussed, testified, written, lobbied, compromised, negotiated, and worked

with the GGNRA to ensure fair and reasonable access to lands acquired with our help. We have raised money, volunteered our time, attended hearings, served on committees, and participated in negotiated rule-making in good faith. Most of this has come to naught.

If you really intend to handle this issue fairly, you would scrap the whole thing and start over. You would do so for reasons articulated much better in the following documents:

* Comments on the GGNRA Draft Environmental Impact Statement by Dr. Suzanne Valente and Stephen Golub of the Ocean Beach Dog Owners Group;

* Unleashed Fury by Julie Walsh;

* Letters from the SF/SPCA to the GGNRA dated July 13 and August 16, 2000, from Ed Sayres, the Executive Director of the SPCA at the time;

* SFDOG's Official Comment on the GGNRA DEIS by Sally Stephens, et al, SFDOG.org;

* Keep the R in the GGNRA: Environmental Injustice Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

* Preserve Recreation for Dogs and People in the GGNRA: San Mateo County Specific Suggestions and Comments, Public Comment on the 2011 GGNRA DEIS by Arnita Bowman, 5/23/11;

* Preserve Recreation for Dogs and people in the GGNRA: Public Health and Safety Suggestions on the Draft GGNRA Dog Plan, by Arnita Bowman, 5/23/11;

* Letter from the Peninsula Humane Society to Frank Dean, from Ken White, Executive Director, 2/8/11;

* 5 Letters from Keith McAllister to Frank Dean, submitted in the last 2 weeks of May, 2011, referenced on the SFDOG.org website.

All of these refer to the biases and broken promises underlying this controversy. All of these speak to the reasons why we find this DEIS to be, quite frankly, a fraud.

For a moment I am going to comment on my personal knowledge of this, from the perspective of someone who worked with the GGNRA from 1987

to 2001 as a Conservation Corps supervisor, as a volunteer, and as an employee and contractor.

In the late 1980's I started doing restoration work at Milagra Ridge with my CCC crew. We worked with the fledgling Site Stewardship Program, even before Sue Gardner was hired.

My crew and I pulled out thousands of invasive weeds, primarily pampas grass. We then planted thousands of native grasses, forbs, and shrubs, mainly seedlings, in order to provide habitat for endangered Mission Blue Butterfly.

We then worked at many other GGNRA locations, also doing habitat restoration. Specifically, we worked at Oakwood Valley, Muir Beach, Sweeney Ridge, Muir Woods, the Marin Headlands, Crissy Field, and Fort Funston, as well as the Presidio. We also participated in volunteer events, helped with trail reconstruction, and talked with community members.

During all this time dog-walking (as well as bike-riding and kite flying) were accepted forms of recreation. People walked by with their dogs all the time. We took steps as a crew to keep the public safe, and that included keeping the dogs safe from weed-eaters and other tools.

At no time did my crew ever express undue concern about dogs. Some expressed concern about everything, since they'd never been in nature before: bugs, poison oak, urinating outside. Dogs were the least of their concerns, and usually a total non-issue.

As a note, my crew was composed mainly of young people of color. Many were first generation Americans. It was truly a rainbow: Samoan, Fijian, African American, Salvadorian, Mexican, Nicaraguan, Philipino, Native American, Cambodian, Vietnamese. They enjoyed dogs for the most part, and often told me of their own family pets. This contradicts the idea that certain ethnic groups are afraid of dogs, and that dogs should therefore be restricted.

Park Service staff frequently brought their dogs with them. Up until the 1990's, Conservancy and park service staff were friendly and companionable with the dog walking community in all these places. I did many volunteer projects during that time, and again, heard no complaints from staff about people and their dogs. It is untrue that staff members felt afraid.

In fact, the dog-walking public was invited to participate in all these habitat restoration projects. For many of us, it was perceived as a way to get out with our dogs on the weekend and do good work at the same time.

This changed around the mid 1990's. I can tell you my experience.

I was working as a volunteer for Site Stewardship at the time, after my CCC day job. I designed and organized a study at Milagra Ridge on public use patterns in conjunction with staff at Site Stewardship. We'd mainly seen dog-walkers, cyclists, kite flyers, and birders up there, and wanted to quantify it for some upcoming trail planning. Staff members, volunteers, and I took turns watching people walk the trails. We made sure we had people of differing opinions about dogs and bikers, so that we wouldn't be biased.

We measured, among other things: 1) which trails people used, 2) whether they had dogs, 3) how many dogs and people there were in a group, and 4) how far off the trail dogs went. We found that most people who were there with dogs were walking "off-leash", but their dogs were staying close by. We also estimated that about 90% of dogs stayed within about 10 feet of the trail.

(For some reason dogs are often portrayed as running willy-nilly over these areas. In truth, unless they are active play areas, the dogs tend to walk in synch with their people. In fact, walking is one of the ways in which people manage their dog's behavior, because it keeps their dog moving.)

We also found that there was an observer effect...if people saw us looking at them, they'd put their dog on a leash.

Just as we finished this study and quantified the results using the new GIS/GPS technology, things changed at the GGNRA. Suddenly we were having meetings in which staff members were displaying "dogs-on-leash" signs. Sue Gardner and I had a meeting with Nancy Hornor, in which Sue was supposed to present the results of our study. Instead, Sue decided to suppress the study, because she saw that it didn't fit in with the direction the GGNRA was heading.

Unfortunately, that has been my experience since then. Many of us in the public, especially those of us who are both environmentalists and dog-folks, have supported the GGNRA in their efforts to acquire and restore land. After the GGNRA has acquired the land, they use restoration as an excuse to exclude us. It is a form of bait and switch.

I've seen this occur at Muir Beach, Rodeo Beach, the Marin Headlands, Crissy Field, Land's End, Ocean Beach, Baker Beach, Fort Funston, Mori Point, Sweeney Ridge, and Milagra Ridge. It is now happening at Rancho Corral de Tierra and Pedro Point.

One of the other things that I experienced as an employee and contractor in the late 90's was the emphasis on "community partnerships" and "inclusion".

Brian O'Neill had staff meetings where he touted again and again the fact that the GGNRA was forming partnerships with all these community groups.

However, the records from that period show that the dog groups were not permitted to form partnerships. Even in cases where the GGNRA and the dog groups made explicit agreements (like with Crissy Field), the GGNRA reneged on that agreement.

As an aside, Crissy Field is an example of the ways in which the GGNRA has created user conflicts and over-use. In the mid-1990's the GGNRA started enforcing leash laws on the Great Meadow at Fort Mason, a place neighbors had been bringing their dogs for decades. Dog folks were therefore forced to go to Crissy Field if they wanted to walk off-leash. This seemed environmentally contradictory; people had to drive somewhere in order to walk their dogs, and that area was becoming more crowded.

Crissy Field was also renovated during that period. The renovation forced the dog folks, the families without dogs, and the wind-boarders to enter using the same part of the beach. They had previously been spread out over a larger area.

The renovation/restoration was controversial among the staff members I knew. Some disliked the agreement the GGNRA had made with the dog community, promising full off-leash use of the beach and pathways. Some felt okay about that, but thought the drainage in the lagoon wouldn't work.

Now, any problems at Crissy Field are blamed on the dogs, even though it is a high use area for at least six intersecting groups: families, professional dog-walkers, recreational dog-walkers, wind-surfers, shorebirds, and tourists. Many people utilize Crissy Field because they belong in several of these categories.

On any sunny day you will find families with both children and dogs enjoying themselves. On hot days inland, regional tourists and their dogs flock to Crissy Field (as well as Baker Beach, Ocean Beach, Muir Beach, Rodeo Beach and Fort Funston). I know many surfers and wind-surfers who patronize Crissy and Ocean Beaches because their dogs can come along.

Crissy and Ocean beaches are also the staging ground for large community events: July 4th fireworks, marathons and charitable races, the Blue Angels, sailing's opening day, and special events like the Queen Mary and the America's Cup.

In the late 1990's, the same kind of duplicity was happening at Fort Funston, Ocean Beach, the Marin Headlands, Muir Beach, Oakwood Valley, and Rodeo Beach. I was working at that time with Sharon Farrell, who I

respected a lot. She constantly spoke of openness and inclusion. Volunteers of all sorts were welcome on projects; their input was invaluable.

However, I later found that she had written internal memos advocating changes at Fort Funston, changes which she hoped to keep secret from the dog community until it was too late to oppose them. That was personally heartbreaking to me, because I trusted her. The irony, of course, is that she was one of the staff people who took her dog on projects; Brie was always part of everything we did.

Other staff people were writing the same kind of memos about Muir Beach, Oakwood Valley, and the Marin Headlands. They complained about the children's camps, the recreational dog-walkers, and the old people who prevented the non-native plum tree at Oakwood Valley from being cut down. They wanted to use pesticides to remove non-native plants, and wanted to avoid having the public know. Sometimes it felt like the park was a preserve that only a special few should have access to, instead of an open space bordering a large urban area.

One of the saddest and most frustrating elements of this whole proposal is that there are many, many ways to do habitat restoration that includes recreation and the public. On Milagra Ridge, for example, dog walking is primarily confined to the road and trails. It's a great place to walk if one wants vigorous exercise with their dog, or if one is physically disabled (because of the paved road and the easy access).

If most plantings were 10 feet from the trail there would be negligible effects from dog-walking. If seedlings were protected by large downed branches and other natural protections, they would have a chance to flourish. If trails were lined with larger plants like coyote bush, sticky monkey flower, and ceonothus (like at Sweeney Ridge), few dogs or people would go off trail.

This is not a matter of science. This is not a matter of habitat protection. This is a social, political, and philosophical disagreement about who has the right to have access to these lands. Everything else is just lies and fluff.

The GGNRA states that children and elderly people are afraid, and that's why dogs must be restricted. Has the park service studied this? No. In fact, on any given day, I bet that a good half of the users of Fort Funston are over 50. On any sunny weekend, I bet that 1/3 of the families at Baker Beach, Ocean Beach, and Crissy Field have both children and dogs with them. This is an educated guess, based on years of observation and fieldwork.

The GGNRA states that the disabled are afraid of dogs. However, many of the people who use these areas are there because of disabilities. People with diabetes, arthritis, and depression walk to keep their conditions under

control. People with mobility problems go to Milagra, Funston, Fort Mason and other places because they can recreate more easily with their dogs on the paved surfaces. People with service dogs go to these areas so that their hard-working dogs can take a needed break.

The GGNRA states that people of color are afraid of dogs. When I go to these public areas, I see people of all races and nationalities. When I say this to people who are apparently of Asian, Hispanic, or Pacific Islander heritage, they roll their eyes. I'm regularly stopped in city parks by kids with parents in tow. If the parents don't speak English, we signal to make sure it's okay for their kids to touch my dogs. All their kids want to do is pet, play, throw the ball, and run.

I just received an e-mail from another dog person, who says it well:

I was walking in a Bay Area park today on a beautiful rocky narrow trail. It was posted for no bicycles, but there were bicycle tracks and a little erosion.

I was thinking about the similarities of mountain-biking and walking dogs in open space areas. They are both recreational activities beloved by people that have the potential in the wrong place and time to do damage or cause injuries. How would they deal with the bicycle riding in the wrong place?

They would never close the entire park to bicycles, including fire roads. They might put up additional signs, or erect barriers, or if there were resources increase patrols. They would not ban it in the entire region.

I feel as if the goal of the GGNRA from the beginning has been to ban off-leash dog-walking. The proposal is for the most restrictive option, and this is very important, for the entire elimination of off-leash walking in the future with no further discussion. I do not understand why dog-walking is not viewed as a valid recreational activity. There is no other activity where the plan is to ban it entirely if someone breaks the rules. When many people and dogs are restricted to a small crowded area, it is inevitable that some problem will arise.

Walking the dog is an important activity to so many people who are older and socially isolated. I was recently reading about how the population of San Francisco is greying and I do not understand why this is not valued. I feel that it has been clear since the beginning of this process that the goal is to eliminate off-leash dog walking. It makes me wonder why nearly the entire coast from Pt Reyes to the middle of the San Mateo peninsula has been given to the federal government to manage.

This writer said it as well as I could. Please reconsider your prejudice as well

as your plan.

Thank you. Lisa Vittori

Correspondence ID: 4219 **Project:** 11759 **Document:** 38106

Received:

May,30,2011 23:34:32

Correspondence Type:

Web Form

Correspondence:

The GGNRA's proposed restrictions on dogs goes against the Act of Congress and subsequent Public Law which established the GGNRA. This law encourages recreation. For many people, walking with one's dog is a recreation. It is a typical and normal American recreation. To re-strict a person of the right to walk his dog in this established recreation area goes against the will of Congress, and against what is a normal American activity.

Public Law 92-589 Subchapter LXXXVI - Golden Gate National Recreation Area 460bb. Establishment "In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural scenic and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area is hereby established..."

In my opinion: Dog walking on-leash should be allowed everywhere in the GGNRA in all cases. Dog walking off-leash should be allowed be default. If off-leash restrictions are to exist, then only minimally and where absolutely necessary, and by public demand, and after careful analysis supporting the restriction.

Correspondence ID: 4220 **Project:** 11759 **Document:** 38106

Received:

May,30,2011 23:40:32

Correspondence Type:

Web Form

Correspondence:

My Wife and I (and our well behaved, non-destructive dogs) would like to respond to the GGNRA's plan to make changes to the off leash dog walking areas under their control in Marin, San Francisco, and San Mateo counties.

We Strongly oppose the GGNRA Draft Dog Management Plan for several reasons, but will limit this document to those that we feel make the most sense in an effort to save time and be read.

Primarily, we would like to address the document written in 1979 that provided that dog walking is a legitimate recreation, and as such, it should

be offered to recreational areas in the same manner as, but not limited to: Walking, Running, Surfing, Bicycle Riding, Horseback Riding, Shell Collecting, Stone Skipping, Gathering at beach fires and Sandcastle Building.

All of these "Recreations" are completely acceptable and it seems that walking a dog off leash is not. I would not want any of these activities to be removed from our coastal areas, even though they aren't the ones I participate in.

We have looked at your documentation as it relates to dogs being off leash, and find that it is sorely lacking in most assumptions, and that if the assumptions were to be accurate, they would have considered the following as being problematic to the environment:

1. Beach Patrol Trucks driving into protected areas. 2. Horseback riding in protected areas (personal and police/ggnra). 3. Off road vehicles ridden by GGNRA staff. 4. Surfers walking through the dunes. 5. Runners, running through the dunes. 6. Off leash Children chasing birds/throwing stones.

We could go on all day trying to document actual issues that might harm the environment, or scare the inhabitants, but they don't really make sense, as the dog issue really doesn't make sense (and carries much less validity).

Please take this into consideration, as we all wish to enjoy our area equally, and as you are soon to find out, there are several hundred registered dog owning voters in the bay area, and we are included. We all pay the ever increasing tax cost of living in the bay area. If you remove "recreation for a few" you may as well remove recreation for all.

Correspondence ID: 4221 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Web Form
Correspondence: May 30, 2011

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

Dear Mr. Dean:

I urge the GGNRA to adopt a plan utilizing the following hierarchy of priorities:

1. Protect natural resources and habitat; 2. Protect children and adults from

harm; and 3. Accommodate reasonable access for dogs where the access does not compromise either of the first two priorities.

Implementing the above priorities should result in dogs being restricted to a short leash when in an area shared by wildlife, as they can still threaten wildlife if on an extended leash.

Similarly, if dogs are permitted in an area shared by runners or bicyclists, the dogs should be on a very short leash so they do not trip a runner or get entangled with a bicycle.

In order to protect children and adults, dogs should not be permitted in areas where the public frequently is barefooted, especially sandy areas such as beaches or thick grassy areas where a dog's feces or urine might not be easily observed and avoided. If allowed in such areas, dog owners should be prohibited from allowing their dogs to defecate or urinate in such areas, and the owners should be subject to an initial warning following by increasing fines if their dogs defecate or urinate in these areas.

Also to protect children and adults, dogs should not be permitted to run loose where non-dog owners congregate, so the dogs do not run into and cause injury to humans.

The following are comments directed to specific areas:

1. As to Crissy Field and Fort Point, applying the above criteria, dogs should be restricted as follows:

Crissy Field Wildlife Area - prohibited entirely Promenade area - restricted to a short leash (6' or less) Picnic areas - restricted to a short leash All trails - restricted to short leash (6' or less) Airfield - prohibited entirely from the deep grass of the Airfield Crissy beaches - restricted to leash of 10' within 10' of the water; prohibited from beach area more than 10' from water's edge. A fenced dog run should be established south of the parking lots for off-leash dog activity with a dirt surface (not sand, asphalt or concrete) where dogs can run, socialize and defecate, with a gathering area for the dog owners to congregate including benches. There should be a substantial dog-run at the east end parking lot (perhaps 50' by 150'), and a much smaller one at the west end of the Crissy area in close proximity to a parking lot.

2. As to Baker Beach, Marshall's Beach and Golden Gate Bluffs south of the bridge, applying the above criteria, dogs should be restricted as follows:

All trails south of the sand ladder/steps - restricted to a short leash All trails north of the sand ladder/steps (including Battery Crosby and Battery to Bluffs) - prohibited entirely Marshall's Beach - prohibited entirely Picnic

areas - restricted to a short leash Baker beach - restricted to a short leash within 30' of the water; prohibited from beach area more than 30' from water's edge. A large, fenced dog run should be established adjacent to one of the parking lots for off-leash dog activity with a dirt surface (not sand, asphalt or concrete) where dogs can run, socialize and defecate, with a gathering area for the dog owners to congregate including benches.

Sincerely,

William R. Shepard San Francisco, CA 94121

Correspondence ID: 4222 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:41:34
Correspondence Type: Web Form
Correspondence: Dear Superintendent Dean,

I am a sixty year old native San Franciscan. I have been frequenting most of the GGNRA areas since before there was a GGNRA. Since 1970, when I got my first dog, I have taken daily walks (sometimes twice a day) in some part of what is now the GGNRA. These walks have always been the best part of my day and have helped get me through some pretty tough times in my life and always, accompanied by an off-leash dog or two. I attribute my relatively good physical and emotional health to these daily outings and know that without this exercise, my health and that of my dogs' would also suffer.

I very much oppose the preferred alternatives as presented in the DEIS as way too restrictive without any scientific backing. I know we are supposed to make substantive comments here but that is quite difficult when there is no scientific data to base comments on. I suggest that the whole DEIS needs to be reworked and presented again in a more professional form. As written there is no justification in the DEIS for the drastic changes that have been proposed.

As a resident of the Outer Sunset District for 40 years now, (grew up and lived in the Marina District first 20 years) Fort Funston is the area I visit the most. When my two daughters were born in the early eighties FF is the place we would go to run everyone...my children, their friends and always the dogs. A few trips up and down the big sand dunes and everyone would be happily tired out. Sadly they would not be able to do that today as that area is now closed off to everyone, people and dogs alike. A similar thing has happened in the Presidio, in the hills behind Julius Kahn Playground. I can't even see any of the places I used to play as a child, for all the fences. Is this the future of our recreational areas? Will my grandchildren have to view

nature from behind a fence? How are the children of the future supposed to develop an appreciation of nature if they can't experience it, touch it, explore it? I have serious concerns about what the real agenda of the GGNRA is. Seems as though they are forgetting that these areas were created as recreational areas. I should know, I was here at the time we voted in Prop F...seemed like a good idea at the time but has turned into a decades long battle. Please do not forget the GGNRA has a recreation mandate. Recreation and environmental protection are not mutually exclusive. Please do some real scientific studies.

Back to the dogs. The GGNRA's own statistics show that dogs are not a problem. It is precisely because we have open areas for dogs to run off-leash that San Francisco does not have an aggressive dog problem. SF Animal Care and Control can support that claim. The proposed ROLA suggested for FF near the parking lot was obviously created by someone who knows nothing about dogs or the reasons their people take them to FF. People like to go to the GGNRA lands to walk and get exercise, not stand around in a small space watching their dog stand around and get bored. My daily walks are at least 1-2 hours long. That's a lot of boring circuits around such a small area. In 40+ years of walking in the GGNRA I've never had a problem with any of my dogs. I've always worked with them to ensure they are good citizens, most have earned obedience titles and some have been therapy dogs, visiting seniors, children and AIDS patients at local hospitals. To think that all of a sudden we will need to be tied together is quite insulting. Also cannot imagine how seniors are going to get down that hill to the beach with a dog on leash. Very dangerous! If the preferred alternative is adopted I think there will be many unintentioned consequences.

The Compliance Based Management Strategy must go. This would seem to pretty much doom the future of dogwalking in the GGNRA and sadly doom the wonderful communities of people that have developed in the various areas over the years. I know, I still have friends that I first met all those years ago. The dogwalking community is probably about as diverse as you can get. All ages, all religions, people with disabilities, gay, straight, all ethnic groups, all social and economic classes. In these very difficult financial times off-leash dogwalking offers a real, affordable respite to be able to watch our dogs at least, run and have a great time, just for the love of running...there are few things more beautiful. The CBMS punishes the majority of responsible dog walkers for the actions of a few...NOT FAIR.

Finally, would like to see the 1979 Pet Policy formalized. I feel that the proposed alternatives are too restrictive and less drastic measures should be tried first. Try enforcing existing laws, better signage, education.

Thank you for listening,

Georgette Musante

Correspondence ID: 4223 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:42:29

Correspondence Type: Web Form

Correspondence: Dear Superintendent Dean,

I have lived in San Francisco all but 5 of my nearly 47 years. As a child my family owned dogs - cocker spaniels - and my fondest childhood memories are of taking Jason, Crissy, and later Emma, to Baker Beach for some fun and recreation. Fast forward and now I have a husband and children of my own and we are a happy family with dogs. Our two dogs - Nova Scotia Duck Tolling Retrievers - get no greater joy than running, playing and swimming on Crissy Field and Beach, which is just a short jog from our house. We feel truly blessed to live in such a beautiful place and just a stone's throw from the GGNRA - a place where we can recreate with our family and our dogs on a regular basis. We are also members of the William Kent Society - a testament to our love of protecting and beautifying this beautiful land.

The DEIS makes us gratefully concerned and we do not find the GGNRA's current preferred alternative acceptable for many reasons. The proposal significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. Moreover, the proposed changes to the existing conditions (1979 Pet Policy) are not based upon sound science or long-term monitoring of site-specific conditions. Additionally, it seems the proposal would cost taxpayer money to enforce, which seems egregious to us since they are not even necessary in our opinion.

As presented in the DEIS, the proposed dog management plan eliminates dog-walking (on and off leash) access for all new lands (additions to the GGNRA sometime in the future). The GGNRA's mission applies equally to new lands as existing lands and it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands.

We are concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options besides restricting dog-walking access should be considered first. For example, it is not clear where dogs are allowed. I think the GGNRA should provide better signage and create more environmental barriers where necessary, such as the vegetative barriers surrounding the tidal marsh at Crissy Field.

Personally, I visit Crissy Field several times a week, on average, and I have

not seen a dog altercation in several years. I have never seen a dog be aggressive to an adult or a child. With the many dogs that are there on weekdays, and the hundreds that are there on weekends, I think that is quite remarkable, and certainly does not justify the restrictions being put forth in the GGNRA's preferred alternative.

We are a family of responsible dog owners. Our dogs are always kept under voice and sight control, we clean up after them, and keep her out of the fenced dunes and vegetative areas. It is important that areas like Crissy Field remain open for off leash dog walking access. I know it is vitally important that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well-behaved dog. Having places where I can take walks with my dog allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA we currently have (approximately 1% of the total acreage of the GGNRA), I am very concerned that many dog and dog owners will not have sufficient opportunity to exercise and recreate.

Some specific problems with the DEIS include the following points. Please revise the DEIS to correct these errors.

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. I wish that the DEIS would include an alternative along these lines.

The proposed "compliance-based" approach should be modified to create a baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

I am also concerned that the DEIS doesn't take into account the potential effect of restricting off-leash dog walking on San Francisco's public parks, which could see a huge influx of dogs as a result. The GGNRA cannot do its planning without thinking of other neighboring recreation areas, such as the public parks, particularly in this time of limited resources.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so. The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts ? other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors.

The DEIS needs to provide full disclosure to the public and decision makers. If dog- related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone ? so that an informed decision can be made. For example, there has been no study on the impact the passage of this will have on the greater city of San Francisco. We believe it could be seriously detrimental.

The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site-specific

information that these areas are inappropriate for continued dog walking.

Many people have worked diligently both together and separately to study the DEIS and to make thoughtful comments on its findings, in hopes of encouraging the National Park Service to rethink and more carefully document its stance. The outcome of this plan will have a significant effect on the quality of our life as well as everyone in the Bay Area. In plain English, I believe that San Francisco should continue to be a successful dog-friendly city much like Carmel, CA rather than many other cities we have visited recently, such as Santa Monica, CA and Ashland, OR where it is hard to find any place to let your dog run off leash and recreate happily.

I urge you to support Alternative A with individual consideration for any new lands, for the sake of the health and recreation not only of thousands of Bay Area residents and their canine companions, but for everyone who enjoys the GGNRA. Sincerely,

Leslie Dicke San Francisco, CA 94123 Member, Crissy Field Dog Group

CC: Representative Nancy Pelosi Senator Dianne Feinstein Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director District 1 Supervisor Eric Mar District 2 Supervisor Mark Farrell District 3 Supervisor David Chiu District 4 Supervisor Carmen Chu District 5 Ross Mirkarimi District 6 Supervisor Jane Kim District 7 Supervisor Sean Elsbernd District 8 Supervisor Scott Wiener District 9 Supervisor David Campos District 10 Supervisor Malia Cohen

Correspondence ID: 4224 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:45:49

Correspondence Type: Web Form

Correspondence: My name is Katherine Buckley. I live in San Francisco's Mission District. I use Fort Funston and Crissy Field extensively, approximately 5 times every week, to get my exercise and walk my dogs off-leash (under voice-control).

For many years I suffered from depression. My therapist recommended more exercise and suggested I get a dog. The therapeutic effects were immediate and enormous. I want my dogs to be happy and healthy and the best way is with lots of exercise and running around a LOT off leash (under voice control at all times). Because of this I started visiting Ford Funston and Crissy Field almost every day. Not only do my dogs get a lot of exercise, so do I. And nothing lifts the spirits like a walk in these beautiful locations with my best friends (ie my dogs). My symptoms have been gone for many years now and these walks have become a mainstay of my life. I, like the vast majority of people walking dogs off leash in these areas, am

responsible (always pick up the poop, always have well behaved dogs, and always treat everyone I meet with respect) and I will be DEVASTATED if the proposed restrictions (especially those in the Preferred Alternative) take effect since my recreational opportunities will be severely diminished.

I am flabbergasted as to why such severe restrictions on off leash dog walking are needed. In all my years walking in Fort Funston and Crissy Field I have seen ZERO incidents of dogs fighting or attacking people. I have, however, run into many very frightening human characters - for example, some drunk and belligerent people camping in the bushes at Fort Funston. And I was at Fort Funston the day someone was shot and killed. Without dogs and dog walkers, I frankly think that these areas will be much more frightening to visit and I certainly would not feel so comfortable with fewer "dog people" there. Since 99% of dog walkers are responsible, I believe it is not right or fair to punish the majority for the actions of the very few irresponsible dog owners.

Things I do support in any dog management plan:

I fully support any efforts to license professional dog walkers or require them to be permitted. They use the parks very heavily for their own economic benefit and should have to pay a considerable annual fee for the disproportionate burden they place on the parks. The permitting requirements should also require that these professionals are certified or otherwise qualified and proven to have appropriate dog handling skills.

I fully support efforts to reduce the number of dogs that 1 person can walk at a time. I have seen some professional dog walkers with 12 dogs at a time. In recent years the number of professional dog walkers using the areas has greatly increased and I do not believe that they can possibly keep more than 4 or 5 dogs in their sight and under voice control at all times. Nor do I find it credible that they are picking up all the dog poop.

I would appreciate MORE off leash dog walking opportunities especially in San Mateo County.

Things that I strongly object to:

The Compliance-based Management Strategy is a very troubling proposal and cannot be part of any plan. It changes the status of areas () automatically and permanently if GGNRA claims not enough compliance with new restrictions. So that off-leash becomes on-leash; on-leash becomes no dog. I cannot frankly believe that this is a credible part of any plan. No evidence of impacts from non-compliance are required, only the fact that there is non-compliance. This could end off-leash access without giving people a chance to comment on the change. This punishes responsible dog owners for the

bad actions of a few irresponsible ones. This strategy should be completely removed - it is underhanded, appears to have an ulterior motive and frankly is something I would expect a dictatorship to use. I wholeheartedly oppose the Preferred Alternative because it is too restrictive. There is no justification in the DEIS for major changes. Instead I support formalization of the 1979 Pet Policy PLUS off-leash access in San Mateo County and on new lands that the GGNRA acquires in the future.

A few other points that I would like to make:

DEIS claims a major safety problem with dogs in the GGNRA. But their own data indicates dogs accounted for only 2% of serious safety incidents involving dogs. The vast majority of serious incidents involved people only. Even if you include non-serious incidents, dogs accounted for a mere 7% of incidents in the GGNRA. Dogs are not a major safety problem. As mentioned above, in all my years dog walking in the GGNRA I have never seen one serious incident involving dogs attacking people or birds but on the contrary I have heard about many serious cases, including murder, involving people-on-people incidents. I would like GGNRA to take into account the possible negative safety impacts of shrinking use by dog walkers if it was to be restricted further; including increased drug activity, prostitution, homeless encampments, assaults and robberies etc. Fort Funston in particular is relatively remote from other human activity and most people using it are dog walkers - without my dog and the many other dog walkers using it I would not feel safe there.

The DEIS does not consider impacts on the health (physical, mental and social) of people if dog walking is severely restricted. The DEIS also does not consider impacts on social communities of people with dogs at GGNRA sites of severe restrictions take effect. I personally have made some very good friends and meet regularly with them as we walk our dogs off leash at Fort Funston and Crissy Field. As iterated in my second paragraph above, I am healthier, happier and more fully engaged with community of dog walkers thanks to the current off leash dog walking opportunities at Fort Funston and Crissy Field. There are many elderly people especially who maintain an active lifestyle and who get to see people every day by walking their dogs in GGNRA.

The GGNRA has a recreation mandate and the DEIS treats recreation as an adverse impact, rather than a value to be preserved. DEIS should add section evaluating benefits of recreation. Thousands of people in the Bay Area have gotten dogs under the assumption that they can be off leash in the GGNRA and this is a primary source of recreation for many people I know, as well as myself. The Preferred Alternative in particular will severely lessen opportunities for recreation for thousands and thousands of people who have dogs. The GGNRA is in a dense urban area, but the the DEIS is written as if

the Bay Area and its residents don't exist just outside its boundaries. This is an urban area, not a pristine wilderness. The DEIS ignores impact on residents or area resources, especially city parks if restrictions take effect. Sites like Bernal Hill and Golden Gate Park will likely be overrun with dog walkers and this will put a severe strain on underfunded City Parks. This is concern has largely been why the SF Board of Supervisors passed a resolution opposing the Preferred Alternative since there has been a lack of study of impacts on city parks. Dog walkers constitute the most diverse group of people who use the GGNRA ? seniors, kids, people with disabilities, gay and straight, all ethnic groups, all religions, all social and economic classes ? all interacting in positive ways, bound by their common love of dogs. There is no mention of this diversity in the DEIS. Minorities are mentioned only in the context of being afraid of dogs. The DEIS incorrectly quotes from a focus group of people who had largely never been to the GGNRA as proof that minorities don't come to the GGNRA because of the dogs. DEIS did not consider negative impacts on minorities and disabled who lose access to dog walking. The people I know that walk their dogs are the most diverse group of people I know in my life - I am a gay immigrant and among my dog walking friends are Latinos, African Americans, people over 60 and a woman with a disability. Our common bond is our love of animals and particularly dogs. The DEIS uses misleading literature citations to claim dogs have negative impacts on wildlife and the environment. When examined closely, many of these studies do not say what the DEIS says they do. Other references cite non-existent studies. Claims of impacts on snowy plovers and bank swallows are not supported by available data. The DEIS must start over and study actual impacts documented to occur at each site in the GGNRA, and must consider whether there are simpler mitigations that can address any impacts that are actually found. Management Tools ? The DEIS does not consider simple management tools that could be added to the 1979 Pet Policy that could alleviate concerns without needing to ban people with dogs. For example, if concern is dogs going over cliffs at Fort Funston, a low-lying fence near the cliff and better signage could keep people and dogs away from the cliff. Education programs to socialize dogs to horses could help reduce negative interactions between horses and dogs on trails. The DEIS describes the visitor experience as focused on people who don't want to be around dogs. I can personally vouch for the fact that the a sizeable number of visitors, and the vast majority at Fort Funston, use GGNRA specifically because they will be surrounded by dogs and dog lovers. The DEIS considers dogs as if they are the only thing in the GGNRA. There is no context. For example, there is no discussion of impacts of natural predators on snowy plover birds and how that compares to those from dogs, or how do disturbances from people compare to disturbances from dogs. Without this context, the DEIS cannot say restricting dogs will have a significant positive impact on different species. The DEIS did not consider negative impacts on dog behavior caused by severe restrictions on off-leash in the GGNRA and by

resulting overcrowding in city parks. Dog behaviorists, including Ian Dunbar, Trish King, Jean Donaldson, and Veronica Boutelle, have said the loss of off-leash exercise will cause an increase in problem dog behaviors, including bites. This resulting increase in problem behaviors will lead to an increase in surrenders at city shelters, which cannot handle the increase. This is another impact on surrounding communities that was not considered in the DEIS. The SF Animal Control and Welfare Commission held a hearing on this and passed a resolution calling on the Board of Supervisors to oppose the Preferred Alternative because of that. Lack of Site Specific Information - The DEIS fails to document actual impacts on resources at each site. DEIS assumes that if an impact "could" occur, it does occur at each site, even though there is little evidence of actual impacts documented at each site. If the DEIS cannot document actual impacts, then they cannot restrict access. Non-compliance does not equal negative impacts ? The DEIS assumes that non-compliance with leash restrictions means there are negative impacts on environment by dogs. Yet there is no evidence that impacts actually happen. DEIS has to re-evaluate that assumption and must base any conclusion on actual documented impacts. San Mateo County and new lands should have off-leash too ? The DEIS mandates that there will be no dogs, either on- or off-leash on any lands that get added to the GGNRA in the future. Even if dog walking has taken place on those lands for decades.

Correspondence ID: 4225 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:46:09
Correspondence Type: Web Form
Correspondence: In general, I support the Preferred Alternative, so that various needs are balanced.

But where possible, regulated Off-leash Areas should be fenced, for safety, and so that the boundaries are clear.

And commercial dog walking should not be allowed. This is an activity that does not belong in a National Park.

Correspondence ID: 4226 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:49:06
Correspondence Type: Web Form
Correspondence: I would like to voice my opposition to the GGNRA's plan to ban off-leash dog walking in the areas around Pacifica and Montara. The ownership of many of these areas have been recently transferred to the GGNRA. Many people who supported this transfer, did not realize that the policy of off-

leash dog walking would be changed. These areas are remote and there is little need to restrict the activity in this area. People in the area have been exercising with their caning companions for many years and to ban this activity will adversely affect the culture of our communities.

Correspondence ID: 4227 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:49:31

Correspondence Type: Web Form

Correspondence: At Crissy Field and Fort Mason dogs off-leash are not a significant nuisance. Most dog owners are respectful and clean-up after their dogs. They generally do not harm the landscaping. I know this because I walk my dog everyday there.

Much more significant are the adverse impact that the weekend barbeques have on Crissy Field and Ft. Mason. Grass is trampled and a large amount of litter is left behind. People with there dogs are comparatively not a problem, and seem like a much lower maintenance cost for GGNRA field staff. The GGNRA does not have adequate documentation showing that people with their dogs have an adverse impact.

Correspondence ID: 4228 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Web Form

Correspondence: 5/30/11

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I use the trails on GGNRA in marin county (mostly oakwood valley) to walk dogs professionally. I have a permit to do so on Marin Open Space, and would be happy to go through the process to get a permit to walk dogs on the GGNRA. I usually only walk between 3-4 dogs in a group, making sure all dogs are under voice control or on leash, and always pick up after the dogs.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon

sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Gina Chang Half Moon Bay, CA 94019

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|-----------------------------|--|-----------------|-------|------------------|-------|
| Correspondence ID: | 4229 | Project: | 11759 | Document: | 38106 |
| Received: | May,30,2011 23:54:44 | | | | |
| Correspondence Type: | Web Form | | | | |
| Correspondence: | I am a middle teacher in the Sausalito Marin City School District. At least twice a year I bring students on hikes to Alta Ridge and Oakwood Valley to | | | | |

experience science and nature. Without fail we are greeted by people with dogs. The most stressful part of hiking and experiencing nature in our backyard is meeting the dogs that are off leash without an owner in sight. For instance, I led a group of 30 students up the Pacheco Fire Road to be met at the Alta trail by 3 off leash dogs. I yelled for the owner, "Dog! Please come get your dog!". While the 3 off leash, not in eyesight of their owner, dogs were friendly enough my students were freaking out. I had at least 4 students hanging on to me and some even took off down the hill to get away. I heard her calling dog's names but they were not responding to her. It had to be a good 20 seconds before the owner appeared with 3 other dogs on leash and another couple of dogs walking near her. I told her there were more children and adults further down the trail and she should leash all her dogs. Her response was they are friendly and harmless. It was a traumatic experience for those students who are afraid of dogs. To see a dog on a hiking trail-which is already unfamiliar territory, minus an owner is scary to say the least. My students should never have to experience dogs off leash AND not under voice control. My students were in an unfair situation that happens too often on Alta. I understood the panic my students felt and hope they don't have to continue to feel under attack when we head into our backyard to learn.

Correspondence ID: 4230 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:54:50

Correspondence Type: Web Form

Correspondence: I am a taxpayer in San Francisco and I live at Ocean Beach. I walk my dog companion Madera Grace 4-6 times per week on the Beach. She is always on leash and we carefully avoid disturbing the birds or other wildlife. I always pick up after my dog and always add several items of trash into my "pooper" bag. This trash is deposited by careless humans who come to the beach to drink, party, set off fireworks (terrorizing wildlife and domestic animals) and then walk away leaving their trash. I moved to the outer sunset so I could walk and run with my dog on the beautiful beach across the street from my house. And it gives me joy to share this natural treasure equitably with my neighbors, other Bay Area residents, visitors -- and both the wild and domestic creatures who reside here.

The areas designated by your proposal are shared urban natural recreation sites, they are not pristine isolated wilderness areas. As city dwellers we are fortunate to be closely surrounded by extraordinary beauty and nature, and it is our responsibility to share it equitably -- as pedestrians, motorists, cyclists, children, elders, and humans in the company of dogs. Yes, guidelines and fair rules need to be established so that we can all feel welcome and safe in our urban recreational areas. However any final decisions excluding or limiting the presence of humans and their canine

companions must be achieved after careful weighing of facts derived from rigorous scientific study and an open inclusive discussion of what is best for all members of our small congested urban community.

Please think of dogs as family members You cannot just delete them from the equation, just as you cannot simply demand that people stop having children. Please understand that for many San Franciscans, animal companionship is an integral component to a happy life, that it contributes towards making life in the city "livable." Let us work towards the establishment of fair guidelines that allow humans and their dogs to enjoy nature responsibly and that allow nature to thrive and be alive on many levels. This also means the thoughtful designation of specific sites for specific use -- such as off-leash run and play areas, leash-only areas, and a small number of fragile impact areas where dogs and humans may need to be off-limits for certain periods of time. The goal is environmental and wildlife conservation while maintaining community quality of life and a shared greenbelt. Balance is everything.

Correspondence ID: 4231 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:55:21
Correspondence Type: Web Form
Correspondence: May 30, 2011

I am writing to oppose the GGNRA's draft dog management plan. Rather than looking objectively and scientifically at facts about the actual impacts of the 1979 pet policy to determine whether any change is needed, the draft plan supports it "preferred alternative" of drastic reductions in voice-control areas and on-leash areas with speculation about what may happen if the current use is continued.

Fort Funston, the GGNRA area that I go to most often with my dogs, is not a natural habitat; the building of the batteries over 60 years ago removed the native vegetation and most of the native wildlife. This makes it an ideal area for dogs to run off-leash. The wildlife and vegetation that now exist are clearly compatible with such uses or they would not be there. Any effects of dog recreation on the snowy plover could be taken care of by a low fence that would keep dogs out of the nesting areas rather than by a ban on off-leash dog use over most of the park.

The GGNRA should be realistic and notice that the main reason people go to Fort Funston is to have fun with their dogs running and playing; they do not go for the area's scenic features. The proposed area near the parking lot where off-leash dogs would still be allowed under the draft plan is much too small to accommodate the number of dogs that visit this park. Any dog

behaviorist will confirm that dog "incidents" are much more frequent in crowded areas and between dogs that are on leashes. With plenty of space, the dogs and people all work it out. There is certainly no factual record of incidents in the draft plan that would justify the proposed limitations.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, and one of the biggest recreation needs in an urban area is dog-walking. Dogs such as my Irish Setter, and many other large breed dogs, cannot get enough exercise on leash; they need to be able to run.

The draft plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:(a)honor the original 1979 Pet Policy and respect dog-walking as legitimate recreation;(b)provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County; (c)exclude speculative, exaggerated, biased, or misleading statements and studies; and (d) provide reasonable ways to address any significant adverse impacts from recreational activities; and (d) use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Correspondence ID: 4232 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:56:08
Correspondence Type: Web Form
Correspondence: All of the suggested options are awful, off-leash recreation should be INCREASED in the GGNRA but since hell will freeze over before you would allow that, I throw my support behind the status quo = the 1979 Pet Policy. Just formalize it with a Section 7 and move on to a REAL ISSUE, not this manufactured one.

Correspondence ID: 4233 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:56:39
Correspondence Type: Web Form

Correspondence: May 26th, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am a resident of the Potrero Hill district of San Francisco, a regular GGNRA park bird watcher and NPS volunteer. I also serve on the conservation committee of the Golden Gate Audubon Society. I have spent the last three years trying to understand and expose the industrial pollution in San Francisco that kills hundreds of birds annually.

I worry about birds and spend many hours putting my health and safety at risk to save their lives. I also speak on their behalf before governmental and civic groups to raise interest and respect for the welfare of all wild animals.

I do not live with a cat or dog but I appreciate their important role and believe that they (and other animals) occupy a central part of our culture as well as social structure.

We are content to materially profit from their service to law enforcement; the military; security; search and rescue; healthcare and rehabilitation; and as aids to people with special needs.

For many of my neighbors these creatures are their family and friend; in some cases their only friend. They do not want to leave them behind when they enjoy their favorite park.

Many GGNRA parks, especially in San Francisco, are located directly across the street from our homes. In most other communities these areas would be the municipal neighborhood park or beach. In the case of San Francisco they belong to the federal government who prefers to enforce a common set of national laws. These laws do not reflect or appreciate the history or culture of the domestic animal in San Francisco.

The DEIS attempts to make arguments through objectifying the dog and blaming them for the destruction of elements our environment such as soil, native plants and birds. I do not believe that your position regarding shorebirds and threatened species is well researched. During my conservation work in San Francisco I have obtained much empirical data about populations of birds and the conditions that may be harming them individually and specifically. I believe that your staff should scrutinize this data before reaching the decision to implement your "Preferred Alternative" plan.

The remainder of these comments about your DEIS are snippets of information gleaned from databases and reports that I have discovered during the last few years. They point to larger questions and data about the actual effects dogs have on wildlife. They also question the prevailing truism promulgated by the modern conservation lobbyist. GGNRA vs. Point Reyes National Seashore (PRNS)

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It appears from the DEIS that GGNRA wants to behave and appear more like the PRNS. It seems fitting to compare the differing characteristics of these two parks in respect to their public use and the success of its avian wildlife.

PRNS provides four beaches (along its 27 Km of beaches) where on-leash dog walking is permitted (1). According to the PRNS park map off-leash dog walking is not allowed anywhere in the park(2). PRNS services the sparse residential populations of West Marin. Its beaches are long and deep, mostly free from human disturbance and are inviting grounds for wintering and migrating birds.

Activity and Disturbance =====

In contrast, the ten GGNRA beaches surveyed have 5.6 times (560%) more visitors (per Km surveyed) than PRNS (not including dogs) (3). GGNRA has 15 times more off-leash dogs per Km and 8 times more on-leash dogs. About half as many parkgoers bring their dog to PRNS beaches (6%) vs. GGNRA beaches (13%) (4).

On average over three times as many people are engaged in 18 named active sports on GGNRA beaches than there are at PRNS. This number does not include strolling, jogging or dog walking (on or off leash). Activities assumed to disturb shorebirds such as surfing is 42 times more common in the GGNRA with a density of 4.8 surfers per Km.; Boogie Boarding with 16 times as much activity, ATV riding 15 times; and kite flying, 7 times greater than at PRNS.

Effects on Shorebird Population =====

Despite the sparse and undisturbed natural conditions for birds at PRNS as compared to the GGNRA, this park has the same number of regular species of shorebirds as the GGNRA. GGNRA beaches hosts about 2/3 of the total population of individuals as PRNS. This difference is explained mainly by wintering flocks of Dunlin, Western and Least Sandpipers that roost at PRNS in great number.

In comparison, GGNRA has 2.4 times more Willets; 2.5 times more Black

Oystercatchers; 5.7 as many Killdeers; 2.2 times as many Long-billed Curlews; 2.2 times as many Long-billed Curlews and 20% more Sanderlings than PRNS per Km. surveyed.(5)

Mortality =====

There were about 6 times more dead shorebirds found at PRNS (76 Vs.12) since the study began in 1993. Per kilometer surveyed there are 2.6 times more dead Willets found onPRNS beaches despite a 2.5 times larger (living) population on GGNRA beaches. (6)

Endangered Species =====

No dead Snowy Plovers, Bank Swallows or threatened Rails have been found by BeachWatch during the 18 year study period. Over 70,000 intake records (collected over 19 years) by our local animal rehabilitation hospital show that no Snowy Plovers, Bank Swallows have been admitted for treatment. Four Clapper Rails admitted were not attacked by a dog and were not found on NPS property. (7)

As of May 2011, 4.31 roosting Snowy Plovers (per Km. surveyed) have been found on unprotected Ocean Beach Central. This is about the mean since 1995 (8) and 30% higher than the median value even though San Francisco population has increased about 10% during this period.

Also, simple correlations (at the yearly level) between the number of Snow Plovers and 1) beach visitors, 2) off-leash dogs and 3) on-leash dogs are all positive (.30, .19 and .17 respectively). This indicates a positive association between the presence of the plovers, people and dogs. We would expect a significantly negative correlation if increased disturbance caused by a human / dog presence was driving the birds away and lowering their population

Monitoring Snowy Plovers at Crissy Field
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The correlations found at Ocean Beach Central compliments a study (8) that measures Snowy Plover disturbance rates on West Crissy Beach (Snow Plover WPA), during a 15 week study.

This study shows only a .7 Snowy Plover disturbance rate per Km. surveyed (i.e. less than 1 bird / kilometer). A "disturbance" is considered any event that causes a bird to take defensive action such as vocalizing, crouching, aggression, unfolding its wings or flying away. It does not imply threat, injury or death and can be caused by anything such as a wind-blown candy

wrapper, an unexpected sound or the sight of a predatory bird.

The .7 bird/Km. disturbance rate was caused by only 3.90% (n = 14) of the 298 people and 58 dogs visiting the beach during the 15 week study. Of these 14 disturbances recorded 93% (n = 13) were human involved disturbances; 7% (n = 1) was an off-leash dog and 12% (n = 2) was an on-leash dog (Please see (9) for explanation about the percentage discrepancy).

According to this data an off-leash dog would disturb a Snowy Plover once every 20 Km (12.4 miles) of beach. (10)

If this study has accurately sampled the activity on this beach then eliminating dogs entirely would lower the overall disturbance rate from .7 birds to .55 bird per Km. It would also increase the human visitor disturbance percentage from 3.90% to 4.58% (11/240) as at least 58 people would be effectively evicted from the beach.

In sum, it is the person (without dogs) who is creating the miniscule amount of disturbance taking place on West Crissy beach. If a theory holds that "disturbance" is threatening the Snowy Plover then it is human interference that must be controlled.

I am not aware of any large scale dataset that shows any relationship between the harm or death of shorebirds or threatened species and the presence of dogs on any local beach. Comparing GGRNA with PRNS shows the minimal difference in avian success between two parks with much different characteristics and uses.

I do not agree with the GGNRA's current preferred alternative as it significantly and unfairly restricts and eliminates dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. The GGRNA should use readily available empirical data to prove its point and to interpret their findings to the people who will be most affected by any new rules. If people are hurting wild animals by their actions or life style they should be informed about the details of this offense.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely,

Richard Drechsler San Francisco, CA 94107

Footnotes =====

1). See Point Reyes National Seashore Park Map 2). See Point Reyes National Seashore Park Map 3). See the Beach Watch Database at <http://www.farallones.org> . Beach Watch, part of the Gulf of Farallones National Marine Sanctuary, has been collecting data since 1993 on central Ca. beaches about dead and living vertebrates as well as different types of park usage. 4). See the Beach Watch Database at <http://www.farallones.org> . 5). See the Beach Watch Database at <http://www.farallones.org> . 6). See the Beach Watch Database at <http://www.farallones.org> . 7). Details about this wild animal rehabilitation facility are available on request. 8).Western Snowy Plover Monitoring at the Crissy Field WPA 2009/2010" "Golden Gate Audubon Society, 8/19/2010, Authors: Michael Lynes, Matthew Zlatunich 9). I counted the on-leash disturbance as both a human and dog involved incident, as as it isimpossible to know for sure of the bird reacted to the dog or person; Therefore the higher than 100% total. 10). Calculation -- $.7/14 = .05$ SNPL / Km or 1 every 20 Km.

Correspondence ID: 4234 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:57:56
Correspondence Type: Web Form
Correspondence: I am writing to oppose the GGNRA's draft dog management plan.

The GGNRA was designed as an urban recreation area that can accommodate both recreation and conservation, and that the existing 1979 pet policy should not be altered as time and again the citizens of San Francisco, Marin, and San Mateo Counties have shown that they support the existing pet policy, and it has been upheld by the courts, as the existing pet policy is consistent with the original mandate for recreation upon which the GGNRA was founded.

In my opinion, the GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. I strongly urge the National Park Service to revise the dog management plan to: honor the original 1979 Pet Policy, respect dog-walking as legitimate recreation, and provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979.

The GGNRA is a vital resource for the dogs of the Bay Area and their

owners - for exercise, for dog socialization, for forging the human-canine relationship, and for enjoying the nature and unique beauty of the GGNRA. The local municipal parks simply do not allow or cannot accommodate the huge number of dogs in the Bay Area, which makes access the open spaces of the GGNRA even more important to residents of a crowded, urban environment. Simply put, dog-owners depend on the resources of the GGNRA on a daily basis to keep their dogs healthy and well adjusted.

I am a regular user of Fort Funston, Crissy Field, Ocean Beach, Rodeo Beach, and Muir Beach, and ask that you do not change the current policy at these sites.

Sincerely, Edward O'Connell Tiburon, CA

Correspondence ID: 4235 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:58:23

Correspondence Type: Web Form

Correspondence: These are comments I've distilled from others over the course of this comment period:

We demand an independent review of the comments from the public. The GGNRA has said they will give the public comments to their own staff -- the very same people who did the flawed, biased research that the GGNRA uses to justify restricting off-leash -- to decide if the criticisms of that work is valid. This is an egregious conflict of interest.

The NPS must have non-GGNRA-staff or GGNRA-associated researchers to independently analyze and review the public comment and to independently determine how the Alternatives must be changed (or even if the DEIS should be thrown out and the whole process started over) as a result of the public comment.

Re: Healthy Parks, Healthy People. Below is directly from the NPS website. "The fundamental value of nature as integral to our health as a species is one of the precepts underlying the establishment of the national park system. As Director Jarvis pointed out in a recent speech at the Harvard School of Public Health, the connections between personal health and parks have been evident since public parks were conceived in the 17th century. A growing body of research has documented the significant health benefits of time spent in nature and exercising outdoors. While certainly not a panacea, parks have the potential to play a major role in addressing the nation's current health crisis reflected in the alarming increase in heart disease, diabetes, and obesity. In recent years,

examples of parks being utilized as places of health and wellness by medical practitioners have begun to appear throughout the National Park System, as well as in state, regional and local parks. The Healthy Parks Healthy People US forum at Golden Gate draws on some of the key points of emphasis in the recently released America's Great Outdoors report, and also reinforces First Lady Michelle Obama's "Let's Move" initiative. To further reinforce the parks/health connection, this year's theme for National Park Week (April 16-24) is Healthy Parks Healthy People." I think this beautifully speaks to why saving dog recreation is so important and why dog people should be commended instead of condemned for being out in the parks on a daily basis with our dogs. The Bay Area is an example of parks being actively used and the Bay Area currently being one of the healthiest places to live. The politicians just need to go to trails that allow dogs, and bicycles, and joggers and see that we are already living these fundamental values. We have to save active living for this generation and future generations.

Tens of thousands of us walk and play daily in the parks with our dogs. We often walk for an hour or more. Many of us are elderly, or people of color, or people with children. Many of us have disabilities which we keep in check by walking daily. Isn't this exactly what you want? Isn't this what "Healthy People, Healthy Parks" is trying to achieve?

Re: Social Justice:

*Dog walking is enjoyed by families, minorities, seniors, and the disabled and contributes to the health and well-being of all.

*Walking our dogs is a sport that everyone can play for free if the parks remain open. The poor can enjoy the same open space as the rich.

*The poor can afford to go to a public park to exercise and socialize where they may not be able to afford a gym membership or doggy daycare.

*Horses are for the more elite and the NPS is planning to build trails to accommodate horses. What have they built to accommodate dog walking by the less elite?

*Are the poor and minorities really going to want to go to Fort Funston to watch the lessingia grow or to search for the hidden Snowy Plover? Last time I checked, bird watching and gardening wasn't the poor and minorities top 5 fav recreational activities either. I'd guess they'd rather go have a picnic with the family on the beach with a game of soccer or have a campfire. Turning 80% of

Ocean Beach into a bird sanctuary doesn't support their recreational needs either. This feels like a few people high-jacking the parks with slight of hand and imaginary tales of mystical demons geared to keep the masses in line.

Is any other public sport or pastime that is subject to such a high expectation? The disrespect towards of our heritage and the imminent loss of our COMMUNITY is certainly going to be a major point in my public comment, and hopefully a part of everyone's public comment. ?

The Department of Interior, which the NPS is a part of, states: "Our Mission: Protecting America's Great Outdoors and Powering Our Future: The U.S. Department of the Interior protects America's natural resources and heritage, honors our cultures and tribal communities, and supplies the energy to power our future." Show us with deeds and not just with words. I'm still baffled by the NPS talking about preserving cultural heritage (e.g., the old batteries) for future generations in the DEIS when they are so disrespectful of the existing Bay Areas culture which is alive and well and embraces diversity, choice, and being active outdoors.

The dog community is a dynamic, active community that needs to be honored not demonized in the name of their NPS dogma. WE ARE A COMMUNITY too. I don't see the DEIS "Powering our Future"; instead our community is being systematically shut down with one cut after another.

??I am a longtime member of the Sierra Club, and I am appalled at the discriminatory bias that the National Park Service has against man's best friend. ??I love the outdoors and I'm a committed environmentalist. I also love my dog, and my favorite pastime is exploring our natural world with him.

We treat the resources with utmost respect. I do not at all appreciate this document which attempts to paint my dog as some type of villain.

I live in Florida but visit California with my dog. You can be assured that if these restrictions are put into place, the San Francisco area will no longer receive my tourist dollars.??

40% of American families include a family dog. It has been scientifically proven that owning a dog improves our health and longevity, but only if we can provide the right amount of outdoor exercise and stimulus for them.??The GGNRA has already restricted dog owners to less than 1% of its space. It

should be INCREASING the space available for this 40% of the population, not decreasing it.

Walking with and enjoying the outdoors with our dogs is a timeless human recreational activity; one of the simplest, most basic forms of recreation since the human and canine species formed their special bond 10,000 years ago.?? A friend of mine immigrated to America from Norway and he is flabbergasted at the puritanical attitude about dogs in the outdoors of the United States. He loves many of the freedoms America offers him, but doesn't understand why in Norway, dogs are an accepted part of public life, and are welcomed almost everywhere, but in America, the land of the "free", this basic need is taken away from our citizens.??

Please scrap or rewrite this document to increase dog walking on this public land (purchased with my tax dollars), instead of further restricting it.?

This was written about the EBRPD, but applies here, too:

I am a frequent user of the parks and walk there several times a week. I have been to nearly all the parks, including the remote eastern parks, which have very few visitors during the week. I am very concerned about the recent survey. There were several questions targeting dogs off-leash. This was the only user group singled out for negative comments. This amounts to soliciting complaints about a single user group and may result in a biased survey. I have been nearly run down and have been yelled at by bicyclists, have been chased by cattle, have stepped in horse and cattle droppings and have been accosted by teenagers. There were no questions in the survey about restricting any of these uses. I do not wish to restrict these people, because I do feel that we should share the parks and learn to get along and act responsibly. I hope people feel free to enjoy themselves even if sometimes they may bother me a little. I feel that my activity, walking with the dogs, is being targeted. I do support limiting dogs a few very sensitive natural areas such as marshes and Round Valley. I would like to see the current off-leash policy continued as it is. I hope that any discussion of this will be conducted in an open manner. I am very concerned, reading the survey, that decisions have already been made and that a biased survey will be used to support decisions that have been made behind closed doors.

City Of San Francisco:

SEC. 41.12. DUTIES OF OWNERS OR GUARDIANS. 5. ADEQUATE EXERCISE All dogs must be provided with adequate exercise. "Adequate

exercise" means the opportunity for the animal to move sufficiently to maintain normal muscle tone and mass for the age, size and condition of the animal. 6. PENALTIES Any person violating the provisions of Section 41.12(c) of this Article shall: (1) upon the first offense in any 12-month period, be deemed guilty of an infraction and upon conviction thereof shall be punished by a fine not to exceed \$50.00; (2) upon the second offense in any 12-month period, be deemed to be guilty of an infraction and upon conviction thereof shall be punished by a fine not to exceed \$100.00; (3) upon the third and any additional offense in any 12-month period, be deemed guilty of a misdemeanor and upon conviction thereof shall be punished by a fine of not more than \$1,000.00 or by imprisonment in the County Jail for a period of no more than 1 year, or by both such fine and imprisonment.

Urban parks should be parks and not terrariums! I love nature and want to enjoy it up close and personally. Dogs get us outside; it would be nice if all rare and endangered species had all the land they need, but I think that all-too-common humans and dogs need space to thrive as well. This is one the most populous areas in one of the most populous states. Perfectly pristine nature preserves, although important, are not practical in urban areas.

This anti-dog attitude is getting very worrisome. I feel we are being discriminated against. And that their studies are biased. Also by restricting the areas we have, forcing all of us into smaller areas causes much more habitat danger. Then they can point their biased fingers at dogs as the destroyers. We need more areas that are close to where people live so they don't have to travel to a few areas shared by too many.

Correspondence ID: 4236 **Project:** 11759 **Document:** 38106

ID:

Received: May,30,2011 23:58:23

Correspondence Type: Web Form

Type:

Correspondence: I would like to respectfully request that you reconsider your plan to change the current GGRNA policy regarding dogs. My understanding is that the City of San Francisco handed over management of the coastal land of Chrissy Field and Ft. Funston to GGNRA with the stipulation that the areas continue to be open to off-leash dog use. This policy was later codified in the 1979 Pet Policy. How it is possible that the GGNRA now has the right to rewrite that legal agreement? Was an EIS not done initially in 1972? Has there been significant change noted in the current EIS? Official policy of the

NPS restricts dogs to campsite and visitor center areas. However, I understand that various national parks have relaxed such rules in order to allow for traditional uses in specific parks, permitting activities such as hunting and snowmobiling. The GGNRA land is in the midst of an urban environment and has been long open to dogs; thus it seems only reasonable and fitting to grandfather-in off-leash canine access. The GGNRA, by its very nature, is very different from most national parks given its proximity to a large urban setting with its roads and dense population. It is a park which is accessed by many people, as well as dogs. The GGNRA would be much more pristine without any human activity at all, but is this what we want? We have decided, as a populace, that the enjoyment of the visitors is more than worth the impact their presence leaves on the land. I am not clear that dogs do any more damage than their human counterparts do. For instance, one day, after dogs were newly restricted to leashes-only along the northern section of Ocean Beach, I witnessed a youngster throwing rocks at the snowy plovers. The adults who accompanied him, presumably his parents, did nothing to stop him. At Ft. Funston, I have, on various occasions, watched teenagers etch their names into the sand dunes along the beach or looked on as people without dogs slide down the large dunes up top, an area ostensibly cordoned off. On the other hand, volunteers comb for dog feces on a monthly basis at Ft. Funston. I would suggest educating the public, by signage and perhaps visits to schools, on the ways in which we might take better care of our natural areas in the GGNRA. We must learn to live with our environment in this case for I do not believe it to be an option to simply restrict all access in order to let the area revert to what it was before man initially came to live here. Regarding the argument that some potential visitors choose not to visit the dog frequented areas of GGNRA due to fear of canines, I would respond that I, in turn, am precluded from those areas of the park which allow mountain bikes, for walking on such trails and needing to keep constant vigilance so as to be able to dodge any bikes bearing down upon me dampens greatly my pleasure in the hike. Yet I do not insist that all biking be outlawed for I comprehend the enjoyment of the bikers. Certainly there is room enough for us all? One percent of GGNRA park land devoted to off-leash dog use is certainly cannot be deemed an onerous compromise. Fort Funston, and Chrissy Field are the only areas in San Francisco where dogs are officially allowed to meander off leash. This affords dogs the opportunity to trot along at their own pace with their many back and forths, which is not afforded them on leash, for dogs and humans naturally walk in different manner. As well, dogs have the opportunity to frolic and swim in the ocean and Bay, which is wonderful exercise for them. Certainly, dogs are able to range freely within the several fenced-in dog parks in San Francisco, but the areas are quite small and unless the dog is young and finds a fellow companion to chase or likes to retrieve a ball thrown over and over again, such parks do not afford the exercise, nor vistas, for either dog or human, that walking through Ft. Funston or Chrissy Field do. Being allowed to roam and investigate periodically off-leash adds much to a dog's

wellbeing. I have never forgotten the testimony given by the policeman in charge of dog bites at the last attempt to restrict dogs at Ft. Funston. He stated emphatically that he expected there would be more incidences of dog bites if the measure passed for the dogs would have less outlet for their natural need to run and socialize freely. If the GGNRA policy is enacted and I am unable to walk my dog off-leash for the ample distances afforded at Ft. Funston and the San Mateo parks, that would mean my driving over to the East Bay - where else am I to go as a hiker - for a dog owner cannot countenance embarking on an enjoyable trek, the meanwhile leaving her canine companion at home! I sincerely hope you will reconsider your Draft Dog Management Plan for the traipses that my dog and I take at Ft. Funston, along with our less frequent visits to Chrissy Field, have been a jewel in my residence in San Francisco - these parks have afforded scenic, meditative walks with my dog, relieving stress and providing exercise in a city full of stucco and concrete. Ft. Funston is an area where one can be completely free from the cacphony of traffic and vistas of manmade structures (but for a couple of bunkers). It would be a great loss for me to no longer be able range upon this land which I have grown up upon, for without my dog by my side, strolls along the beach would not bring the same anticipation and joy. Indeed, I would not take such a walk if it meant leaving him at home. But perhaps that is what this proposed policy desires - no people at all?

Correspondence ID: 4237 **Project:** 11759 **Document:** 38106

Received: May,30,2011 23:59:08

Correspondence Type: Web Form

Correspondence: Thank you for the opportunity to comment. The most environmentally protective alternative: Alternative D: Most Protective Based on Resource Protection/Visitor Safety, should be the chosen alternative. Alternative D provides the highest overall level of protection for natural and cultural resources and the highest overall level of visitor safety. No allowance should be made for commercial dog walking as discussed under alternatives B, C, and E. This would set an illegal and dangerous precedent and would open the door to legal actions for equitable conditions in other National Parks. It is a waste of taxpayer funds, a potential violation of the Endangered Species Act and would result in numerous negative environmental impacts and costly mitigation. The GGNRA is an amazing resource to the entire population of the San Francisco Bay Area, but the current policy is inconsistent and confusing as is the proposed policy of allowing a mishmash of various alternatives in different areas. Allowing off-leash dogs in areas adjacent to any water source, including the ocean, has already proven to be the largest source of fecal coliform pollution in San Mateo County, but it is likely the same in other counties. I have witnessed countless observations of dog waste in GGNRA beach areas.

My personal public safety experience, as described below, does reflect on the above comments, but my primary concern is the environmental consequences of allowing dogs off-leash anywhere in the GGNRA. The potential environmental consequences of dog use in the GGNRA always result in negative impacts to soils, water quality, vegetation, wildlife, special-status species, and cultural resources. As a resident of San Mateo County, I have observed countless occurrences of dogs running off the trails, including through habitat restoration areas in Mori Point. In addition, dogs chasing birds on the beaches in all GGNRA areas is truly unacceptable and a huge significant impact to the various bird species, protected or not.

As a taxpayer, I find it difficult to accept that the Park Service must or should mitigate for all the negative environmental impacts as well as the cost of enforcement of leash laws. I would personally prefer to hike and recreate in areas where dogs are forbidden as I have encountered so many hostile dog owners who refuse to keep their dogs on leash. I don't understand how the GGNRA will be able to enforce the myriad of alternatives in various areas. I visit Mori Point on a regular basis and rarely see a park ranger. My attempts to remind visitors to keep their dogs on leash are often met with hostility, disregard or complete ignorance.

I have avoided visiting Fort Funston as the environmental damage, including dog waste, is unacceptable and depressing. It has become a dogs only park area and that is truly unfortunate to other visitors. This past January 6th, I injured my ankle moderately on the beach at Fort Funston due to my own actions. As I was walking with my friend's assistance up to the base of the staircase, a nice woman offered to help. She had an off leash dog. As I continued to hobble up the trail towards the staircase, I took a break and while standing there on my un-injured foot I was knocked off my feet by two off-leash dogs-one of the them belonged to the woman who offered to help. I landed on my injured ankle thereby increasing my injury to a serious ankle sprain, required an emergency room visit and four weeks on crutches.

Thank you for the opportunity to comment and please chose Alternative D.

Celeste Langille

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|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 4238 | Project: 11759 | Document: 38106 |
| Received: | May,30,2011 23:59:28 | | |
| Correspondence Type: | Web Form | | |
| Correspondence: | I am in favor of the GGNRA's plan to restrict off leash dogs. Most people who don't own dogs avoid walking in these areas for fear of being hassled | | |

by dogs and their ignorant owners. I hope you don't give in to these obnoxious dog owners just because they are the more vocal group. Also, because of the rugged terrain, most of the dog walkers don't feel the need to pick up their dog's feces. Obviously a health hazard.

Correspondence ID: 4239 **Project:** 11759 **Document:** 38106
Received: May,30,2011 23:59:56
Correspondence Type: Web Form
Correspondence: Dear Mr. Dean,

I oppose the preferred alternatives in the DEIS regarding dog walking in the GGNRA lands and future lands to be acquired. First, I mourn the loss of community that will result as I and other citizens that walk their dogs in the GGNRA are no longer able to meet and walk our dogs off leash together there. This will have a major impact on my life as nearly every friend I have is someone I met at Fort Funston. My social life revolves around walking my dog at Fort Funston. I have built up a network of friends that I see at Fort Funston as I and my dog take our daily exercise there. To lose that is to essentially lose my entire social life. As I understand it, the historic use of Fort Funston, for about the last 40 or 50 years, is as an off-leash dog park. Please allow this historic use to continue.

My dog and I have walked at Fort Funston nearly every day, sometimes twice a day, for the past 11 years. Based upon my observations over that time, it is my belief that the weather has the most consistent and dramatic impact on the land there. I have seen the changes in the land year after year and storm after storm.

Before you eliminate off-leash dog walking from Fort Funston, please consider fencing off the Bank Swallow area with solid fences that dogs cannot run through. Please consider educating the public and improved signage and more frequent ranger monitoring of the park.

I was born and raised in San Francisco and have lived here all my life. I can no longer run with my dog at Ocean Beach, a beach I had been going to since childhood. I can no longer take my dog on the trails at Lands End. Now I will soon lose access for my dog and I at Fort Funston. Where exactly will I be able to exercise my dog? Walking on a leash is not exercise for a dog. A dog needs to walk off leash, and frankly, Fort Funston is the only place left in San Francisco where I can, in a practical manner, go and actually walk for an hour and exercise with my dog off leash.

Sincerely,

Julie Kaufman San Francisco, CA 94132

Correspondence ID: 4240 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendant Dean,

I am writing to ask you to stop the Golden Gate National Recreation Area from implementing its "dog management" plan, which would severely restrict dogs and off-leash dog walking in places like Fort Funston, Ocean Beach, Crissy Field, Marin Headlands, Muir Beach and other locations that have welcomed dogs for decades. The GGNRA's proposal will eliminate a main form of recreation that takes place at these recreation areas and negatively impact thousands of us who live in the San Francisco Bay Area. The GGNRA is not the same as Yosemite or Yellowstone ' it is in the middle of an urban metropolis and needs to meet the needs of urban residents.

Sincerely,

Correspondence ID: 4241 **Project:** 11759 **Document:** 38106

Received: Mar,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: To: GGNRA comments

We wanted to comment on the proposed regulations concerning off-leash dogs in the GGNRA. Many times on Ocean Beach or Baker Beach we have been charged at or growled at by free-running dogs, supposedly under "voice command: of their owners.

The fact is that these dog owners exercise little or no control of their dogs, but certainly make loud protests whenever imposed controls are suggested.

We favor strict leash laws on all public lands, enforced as needed. While some areas, such as environmentally sensitive breeding zones, should be strictly off limits to any dogs, we realize some areas should allow off leash activities, but most areas should require that all dogs be on leash. One person walking more than 3 dogs should be discouraged.

Thank you,

David Hayes

Correspondence ID: 4242 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,24,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Dear Mr. Dean,

I write in support of the Golden Gate Audubon's position regarding dogs in the GGNRA. -Some trails should be for people only. -Off-leash areas should be fenced. -Require 95% compliance of leash laws and restricted areas. I realize this would require enforcement personnel - an expense. -Some areas should be out-of-bounds for any dogs- to protect wildlife and habitat, and allow for a more natural environment. -Could commercial dog walkers go elsewhere?

Please limit the areas where dogs are allowed, for the protection of the natural environment. I speak as a lover of all nature - flowers, plants, birds- and dogs.

Thank you.

Sincerely, Ann Kadyk Berkeley, CA 94707

Correspondence ID: 4243 **Project:** 11759 **Document:** 38106

ID:

Received: Mar,30,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Dear Mr. Dean,

This letter is in response to what little I learned at the meeting held for the public at Cabrillo Elementary School, Pacifica, CA on Wed. 09 MAR 2011 regarding the Draft Environmental Impact Statement (DEIS) for dog management.

I say "little" because even though the meeting was held from 4:00-8:00 pm, I could not get there until after 5:00 pm and could not stay much longer thereafter. So in essence, I spent maybe 30-40 minutes there, looked over what I could, spoke to who I could, and collected what available information I could. As of this writing I still have not been able to access any information that was provided to the public on the free CD?/DVD?/CD-ROM? (I was informed said disc was a "DVD", it did not play in standard DVD or CD player so I assume now it is a CD-ROM meant for PC's only.)

I would have preferred to have been able to take home a copy of the (2400?)

page report and I now think that the report should have been more readily available to the public in its hard copy form. I understand that that would entail printing some extra copies, but in the future I recommend having extra copies available to the public anyway, then possibly subsequently charging them for it thereby recouperating the costs of doing so.

I am in fact a dog owner/walker and I do in fact walk my dog off leash in many of the areas currently managed/owned by the GGNRA. I do recognize that not everyone shares my enthusiasm over canine companionship for whatever reason(s).

Lets take the Ft. Funston area in San Francisco as an example. As a dog owner even I will admit that that area IS NOT an area for any people with an aversion to dogs. So if I wanted to enjoy a picnic, walk, bicycle ride, horseback ride (?) etc., without canine interference, that could very well be an impossible undertaking there. A REASONABLE COMPROMISE might be to have alternating days/weeks/months (?) for dog owners/walkers and those who would enjoy the same area(s) dog free. For example, if I wanted to walk my dog leash free there tomorrow on the 18th, and I know that the day or week was off limits for dog owners/walkers, I would have to make other arrangements. I do not recommend month long hiatuses, one week intervals would probably be more compassionate toward dog owners/walkers (Another thing to keep in mind: professional dog walkers use such areas as a source of income; to close such areas would force such people to lose income or perhaps livelihoods.) The alternating time frame idea, I believe, could work for ALL AREAS in question/dispute.

I am pretty much dead set AGAINST having certain areas LEASH ONLY (Ft. Funston being one of them) There MAY be some places and reasons I could support it. (A primary example would be for safety reasons such as cliffs where dogs [or people for that matter] can fall, and rescue of such dogs would be difficult or time/resource consuming.

What those who, for whatever reasons, are adverse to dogs being in certain areas at all or even just leash free need to keep in mind is the following:

1) Many designated dog parks simply do not work for many species/types of dogs, usually because they are too small. Also, my dog in particular generally DOES NOT like the "forced" socialization that such parks encourage. Many dogs do indeed do fine in such parks, mine, and perhaps other's do not.

2) As many dog owners/walkers will tell you, having a dog on a leash means having to stop very frequently so the dog can engage in its sniffing behavior which can be very irksom even for owners, due to the fact that depending on what the dog smells, literally means stopping every 5-10 feet

for periods of 5-20 seconds or more including every time one dog encounters another. As someone who, when walking his dog likes to keep moving at as constant a pace as is possible, I tend to let my dog off leash for this very reason.

I do have to take some issue with the "environmental concerns" regarding dogs. In your January, 2011 newsletter, page 2, its written that a plan/DEIS is needed for the following reasons:

"Under current conditions, park resources and values could be compromised to the extent that without action, these resources and values in some areas of the park might not be available for enjoyment by future generations."

I have to ask what EXACTLY are the "current conditions" and what EXACTLY are the park resources and "values" that are in danger of "not being available for enjoyment by future generations"? The Mission Blue Butterfly? A garter snake? The snowy plover? Coyotes? Certain plant species?

For example, I was informed by one of the NPS employees at the Cabrillo Elementary School meeting that a species of garter snake is "endangered" at Mori Point in Pacifica. I find this claim dubious at best. Even if true, I find that no reason for alarm. I have seen plenty of the snakes in question and I know that they tend to thrive near bodies of water due to the fact that the frogs these snakes eat also thrive there. I also know that these areas are already bordered or fenced off adequately enough, so that is no reason to make Mori Point dog free or even leash only. I think everyone needs to keep in mind that many of the areas in question did fine WITHOUT any environmental management for decades/eons, and the balance of nature is NOT going to be thrown out of equilibrium just because a few dogs like to chase balls, sticks, rabbits, etc., dig holes (which very few dogs engage in, especially if allowed to run free) run free, bark, or defecate randomly. To ban dogs completely from certain areas or even to make the same areas leash only is extreme, mean-spirited, pretty, selfish, and unnecessary.

I do realize that dog defecation is a problem (albeit more of a nuisance than a crisis). My personal attitude and actions are this: I carry up to five plastic bags of a size and convenience that allows me to keep them in my back pocket of the pants I'm wearing. The more prevalent are designated trash receptacles, the more I'm wont to pick up after my dog. I'll admit that I do not always pick up after my dog. On sandy beaches for example, I hardly ever pick up after my dog. What I DO instead is when I spot him depositing feces, I usually dig a hole approximately 4-5" in the sand and put the dog waste in it and leave it at that, sometimes even if a trash can is within 100 feet of the dog's waste. Also out in a vast field, I sometimes let the waster stay where it is because contrary to popular belief a dogs' waste IS NOT the

environmental equivalent of, say, nuclear waste. (If that was the case the EPA would have to make many dog owners' BACK YARDS off limits!) All sorts of animals are constantly depositing bodily wastes in outdoor areas without creating an environmental catastrophe. However even as a dog owner I am just as thoroughly disgusted when I step in or come in contact with dog waste as someone who may even despise dogs. I usually calculate the chances of someone other than myself coming into contact with my dogs waste and decide to act or not act on whatever I deduce. On trails or areas where many other people hike or engage in other activities every day, I'm more wont to pick up after my dog. Again, given the proximity and/or number of trash receptacles I'm more wont to pick up after my dog. I'll also admit that even as a dog owner I'm fairly disgusted with those who utilize a plastic bag to pick up after their dog(s), then leave the bag on the ground as if they have done everyone a favor.

I'm one of the belief that those people should have just let the dog waste alone rather than bagging it, then leaving the bag at the spot the dog did its business at. I DO understand that mindset of such people because I'm not entirely comfortable myself walking more than 200 feet with dog waste in my hand even if it is safely stowed away in a plastic bag. IF there is no trash receptacle close by and I DO think there is a chance that someone can come in contact with my dogs waste (especially in bare feet) than I make an extra effort to bury/cover it utilizing whatever tools, materials, and loose dirt is available. Otherwise, dog waste is GOOD for the environment! (Yes, good, even the bacteria in dog waste dies or gets consumed by other microbes in the soil, plus plants [even native species] thrive on the fertilizer such waste provides.)

Many people and dog owners/walkers in particular view the proposed ideas in the DEIS as nothing more than a "land grab" at best and "control freakery" run amock at worst. I daresay I'm beginning to agree with some of them due to what else I'm reading on page 2 of the January, 2011 newsletter that I picked up in Pacifica. The rhetoric, benign at first glance, actually starts to come across to me as somewhat authoritarian and threatening upon subsequent reading. To wit:

Under the Preferred Alternative section under bullet point #3 it says: "No dogs in areas of the park where impacts were unacceptable and could not be mitigated,". Here I have to ask: Unacceptable to whom? and WHY NOT be mitigated? Under bullet point # 4 is where the language really starts to sound threatening: "a compliance-based management strategy to institute a range of park responses to non-compliance, including further restrictions or elimination of dog walking where compliance is not achieved,". Even under bullet point #5 it sounds as if the main concern is pecuniary. Finally under bullet point #6 I have to ask: Designated ONLY by the Superintendent?

Also, WHAT criteria?

I do agree that litigation on these matters DOES need to stop. Also, dog owners do need to be responsible and not resort to needless litigation if their animals get injured/killed by wildlife, geography, machinery or even other dogs due to them not being on a leash (I would have to question the frequency of such events.) In the case of dog on dog death/injury, litigation should be between the owners NOT NPS/GGNRA/etc. Of course every negative incident regarding dogs should also be examined on a case by case basis.

In conclusion let me state that I'm NOT 100% against banning dogs from certain areas and/or making them leash only. I would support my own idea of alternating time frames for dog owners/walkers and those who would rather enjoy the area(s) dog free. IF such an idea were employed, then another area close by should be available to dog owners/walkers. (For example if Ft. Funston is closed to dogs than Ocean Beach or Lands End should be opened and vice-versa. Ditto for areas in Marin County) Finally, Mr. Dea, let me say "Thank you" for reading this letter in its entirety assuming it has actually made it to your hands and not been "dispatched" by a subordinate due to length, readability factors, or God forbid, simply because s/he simply doesn't agree with what I have to say.* Good day to you sir.

Sincerely,

Russell Parrish

*Copies of this letter have been made and distributed R.A.P.

Correspondence ID: 4244 **Project:** 11759 **Document:** 38106
Received: Apr,08,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Frank Dean, Superintendent GGNRA:

I am a frequent user of the GGNRA, especially Crissy Field. My concerns are for the natural restoration. It is amazing. My worry is that dogs loving, lovable, and popular + polulous as they are will undermine this huge and successful endeavor. I see few birds there now which tells me they know dogs are everywhere - some leashed + some not. This seems an incomplete restoration because of dogs here.

I love dogs and dogs need parks and ocean areas to swim in. They need a big designated dog park of their own - in SF. To be allowed here and there

means they go everywhere - due to signage problems and owners lacking respect or whatever.

My point- Crissy Field area should not have dogs at all.

Wendy Weikel

Correspondence ID: 4245 **Project:** 11759 **Document:** 38106

Received: Jun,03,2011 00:00:00

Correspondence Type: Park Form

Correspondence: I am a Senior citizen, a single woman, a dog lover, and owner. I support leaving the dog plan as is or adding more off leash dog areas. Because I am senior walking with dogs on leash especially on a Beach is dangerous to my health and safety. Being a single woman I would not walk my dogs nearly as much as I do now because I prefer open space for my health. Without dogs there I would not go at all because I fear for my health and safety without them as companions. My "girls" are part of my family, and leaving them home for family outings or walks on the beach is inconscionable.

Correspondence ID: 4246 **Project:** 11759 **Document:** 38106

Received: Mar,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: Why do we need more rules for dog owners, when we don't enforce the leash law or the rules presently on the books? More rules won't change the abused present situation if we ignore and can't, or won't give the violators fines, or show animal owners they will not be allowed the liberty to endanger children, fecal droppings, dog fights in areas needing protections.

At a very young age, my face was attacked by a German shepard, almost losing an eye, my nose close to torn off from a neighbors dog unleashed. My grandson, while walking at Chrissy field had food snatched from his hands by unleashed dogs.

Can dog owners be thoughtful enough to limit their animals to run where people are safe and no small children present? Several areas, so limit some for dogs and owners who will not endanger other people and children - not Chrissy field.

Count animals not leashed, each day for a week, add up collected funds for violations, improve our safety, police the people parks, let animal lovers control their pets properly so everyone, not just the dogs can enjoy our

beautiful parks.

Thank you

Dee and Lee Frencholm's San Francisco, Ca. 94118-2609

Keep your best efforts and continuing beautification work. Not just complaints, but compliments to an admirable system of beautiful park areas. So proud to live in this area! Thank you!!

P.S. From an old retired pilot, noting not one real airplane and hundreds of dogs on a famous, revered aerodrome, has it indeed gone to the dogs?

Correspondence ID: 4247 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: E-mail

Correspondence: Sherwin, I'm sending this to you BEFORE the deadline, because the PEPC webpage stopped accepting comment early. Please acknowledge receipt. Thank you, James

Comment: I support the Preferred Alternative for the simple reason that there are already too many dogs in certain areas of the park, and some regulation is necessary. I have seen the long, drawn out, Negotiated Rulemaking Process which takes into account every single comment, and forges a fair compromise.

I have seen about 30 dogs, minded by 5 pro dog walkers, simultaneously walking Crissy Field and Baker Beach. The likelihood that these pros can remove all the feces and urine that their charges deposit is nil. The plan regulates all dog & dog-handler use of the park, and balances different user needs with protection of wildlife and history. It proposes MORE "regulated off-leash area" than any other National Park. Urban dog populations keep increasing...their owners have to realize there are limits.

Correspondence ID: 4248 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: E-mail

Correspondence: I am writing to let you know that I am opposed to the proposed GGNRA "Dog Management" plan and hope you will do what you can to stop it. The plan is extreme. I hope you can help stop this proposed plan. It infringes and picks away and the lifestyle we enjoy as San Franciscans. I witnessed today a National Park Police Officer scare off families enjoying themselves in the

Great Meadow of Fort Mason, in the shadow of Phillip Burton. They were playing with their dogs and enjoying the Memorial Day holiday. When the National Park patrol car came into site the entire park emptied. Families with children ran the other direction with their dogs. The Great Meadow was left empty. This is not the kind of place that I want San Francisco and California to be. Please oppose the GGNRA "Dog Management" plan. Thank you.

Correspondence ID: 4249 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: E-mail

Correspondence: I went to submit my comments via the PEPC system and it closed before midnight. The document was open for comment at 11:00 pm, and by 11:20 p.m, the document was no longer open for comment. If the comment period is closes on May 30, it should close at the end of the day. Please accept my comment by email since the system was not functioning properly.

I am dog owner and also consider myself an environmentalist and I do not support the preferred alternative in the Dog Management Plan. I feel that is too restrictive and unfairly penalizes the majority of dog owners for the indiscretions of some bad ones. GGNRA is an urban park, centered in an area with more dogs than children, and dog owners and dogs need more open space, not less. Dogs are not permitted on state lands and the San Francisco city parks that allow dogs are small in size, limiting the length of stay. Many dog owners, like myself, love the privilege of taking long hikes or walks on the beach or on Marin County trails with our dogs. This plan drastically reduces - and in many cases - eliminates this option.

I particularly object to the proposed changes at Fort Funston. The restrictions here are drastic and reduce the amount of off-leash area by almost 90%. The small off leash area near the main parking lot is not nearly enough space for all the dogs and owners that utilize this part of the park. This reduction in space - and forcing too many dogs in a smaller area, could result in conflicts that this plan attempts to reduce. Dog walking at Fort Funston is a long standing recreational use, and it is perfect for it. It has wide expanses of sand, with little important vegetation or habitat (even prior to dog use) which provide open spaces large enough for everyone to enjoy.

The plan discusses a loop trail from the parking lot down the Beach Access trail, along the beach, and up the Sand Ladder. However, the majority of time, the outflow pipe blocks passage down the beach, making a loop impossible. This results in reducing the off leash area even further. One of my favorite places in the city to walk with my dog is south of the sand ladder. The proposed new rule banning dogs on this section of beach is

unfair and unnecessary. This section of beach is not overly used and I have never encountered any conflicts. It is a peaceful stretch of beach, and long enough to allow space for all users. Additionally, this section is proposed as off limits to dogs because of the bank swallows, but there research by California's Department of Fish and Game that found that the bank swallow is remarkably indifferent to the activities of people near nesting sites. Bank swallows frequently nest near intense human activity, including busy highways, construction sites and quarries. There does not appear to be scientific evidence supporting the claim that people or dogs on the bluffs far above the nests or beneath the flyover zone would hurt the birds.

I believe the analysis for indirect impacts to adjacent lands isn't accurate either- no impacts are anticipated for areas at Fort Funston, but when Fort Funston's proposed off-leash area becomes so crowded, dog owners may go to other areas, creating visitor and other resource impacts. In the 1970's and early 80's, Fort Funston was a cesspool of illegal activity. By walking dogs at Fort Funston, dog owners have transformed this part of the park into safe community of people who look out for each other - as well as the environment. Dog owners are not deviants; we are legitimate users of the park that should not be penalized.

The plan seems to set aside certain areas in each county for dogs (i.e. Rodeo Beach in Marin), and without a doubt, the majority of Fort Funston should be for off-leash.

I have similar objections and concerns about the proposed restrictions for Crissy Field. There is little habitat of value at East Beach. This area is very popular area for off-leash dogs, and to prohibit dogs from this area entirely is again, unfair and unnecessary, and forcing all dogs that use this area into the small section of central beach is a recipe for conflicts.

The NPS is changing a long standing tradition of being able to walk a dog - off leash - on the beaches in San Francisco. A better compromise needs to be reached.

Thank you. C. Scerri

Correspondence ID: 4250 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Supervisor Dean:

I write to appeal to you, to allow me to submit below comment -- inexcusably delayed until last hours of last day of comment period (despite,

or maybe because of, pages and pages of notes made on this, for me, painfully difficult subject)

(my attempt at submission had been, ironically, delayed until after dark in order to deal with most recent of innumerable petty crises forced on us by "neighbour" w/untrained neurotic dog)

I made the attempt at half-hour past midnight last night unaware that midnight, for which I was aiming, was too late anyway, designated cut-off having been 11:59 MOUNTAIN time

(midnight found me still struggling to articulate dispassionately three points I considered important, and abandoned, in order to complete and submit comment)

so if you can be lenient, my gratitude to you, with apologies for the trouble -
- barbara deutsch

here's what I tried to submit last night:

I endorse Preferred Alternative, and favor further restrictions in the future on pets in parks, whether captive or loose. I wish to acknowledge and express appreciation for all the hard work done by others, who have so helpfully alleviated my difficulties with formidable pertinent documents, and augmented my understanding. If I understand rightly, the national parks are charged with preserving and protecting the natural properties within them, for the benefit and enjoyment of both present and future generations. Then surely the ability to experience those natural properties ought also to be retained and perpetuated as fully, and in as undegraded and undistorted a state, as possible. Therefore those who wish to observe wild animals, along with the animals themselves, need to be spared the presence of dogs, who, whether on a leash or not, will be perceived as predators, especially if they derive from hunting breeds. Because pet dogs are deliberately prevented from full maturity, and obtain food, rest, and comfort with little if any effort on their part, they enjoy surplus energies unknown to wildlife, -- to whom interruptions of critically needed rest, awareness, and/or activities (also immune systems) represent costly perhaps fatal danger, and cause alienating experience on what should be home ground. Those disturbances and disruptions translate to deprivation for those who wish to engage in nature study, the one visitor activity that should never be denied. I can enumerate many attacks by dogs on wildlife that I or friends have witnessed; I and others I know have ourselves been chased or attacked by dogs; and for everyone of my acquaintance who visits parks, including dog owners themselves, both dog-droppings and the means to dispose of them, have become as customary as they are unwelcome sights -- or worse. Almost as ubiquitous: pet-owners, whether friendly, furtive, flagrant, or hostile, who

violate posted regulations. And there is an ecologically significant impact from the presence of dogs that impressed itself on me when I was the caretaker of a public pathway that passed through open land rich in species diversity of songbirds, plants, and insects. When I began to care for it, the path was used occasionally by one dog-walker. Ten or twelve years later, two dog-walkers being regular users of the path, both the dogs would mark it. Not only did I witness alterations in the composition and growth patterns of the plants but, because I tended by hand, whenever I bent down I gagged involuntarily from the altered chemical field: we don't often think about the delicate chemical signals transmitted among insects and plants -- and other animals too, but those insects and their interactions amount to, in E.O. Wilson's words, "the little things that run the world." Respectfully submitted, Barbara Deutsch

Pt. Reyes Station 94956

member: SPAWN, EAC, PRNSA, Audubon, CNPS, Lepidopterists Society, Sierra Club, Trees Foundation, Nature in the City

Correspondence ID: 4251 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: E-mail

Correspondence: The link to make comments on your dog plan online is not functioning. The comment period is extended to May 31 so there is not very much time. Thanks, Leslie I have a very well-trained dog who has been to 5 obedience classes but I am also a supporter of native plants. We can both live in peace together!

Correspondence ID: 4252 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: E-mail

Correspondence: Date: May 25, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re; Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

My husband and I are residents of Marin County living in San Rafael. We have been supporters of the Sierra Club and many other environmental

groups for over 50 years. Recently several of my colleagues and I formed Marin Pet Care Association, a non-profit organization whose mission is to 'improve the standards of pet care in Marin County' in conjunction with highly respecting the environment we live and work in. My husband and I enjoy various areas in the GGNRA almost every weekend along with our dogs and very rarely encounter people whose dogs are uncontrolled.

The human animal bond is very important to us. As responsible dog owners, we keep our dogs under voice and sight control, clean up after them, and keep them, out of the fenced dunes and vegetative areas. It is important for our dog walking friends and me that areas remain open for off leash dog walking access.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site specific conditions.

As presented in the DEIS, the proposed dog management plan eliminates dog-walking (on and off leash) access for all new lands (additions to the GGNRA sometime in the future) within San Mateo county lands. The GGNRA's mission applies equally to new lands as existing lands and it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands.

We are concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options (besides restricting dog-walking access) should be considered first. For example, it is not clear where dogs are allowed. I think the GGNRA should provide better signage and create environmental barriers, such as the vegetative barriers surrounding the tidal marsh at Crissy Field or the restored dunes at Fort Funston.

As responsible dog owners and advocates for animals, we know it is crucial that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well-behaved dog. Having places where we can take long walks with our dogs allows us to get the exercise we need at our age while also meeting our dog's needs. Without access to the small amount of land in the GGNRA we currently have, we are very concerned that many dogs and dog owners will not have sufficient opportunity to exercise and recreate.

Some areas within the GGNRA also serve as a place of solitude for us and provide us with a very important peace and safe outdoor space and

experience within the San Francisco Bay Area, a large metropolitan area.

Some specific problems with the DEIS include the following points. Please revise the DEIS to correct these errors. This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources.

The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment. The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear.

The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. I wish that the DEIS would include an alternative along these lines.

The proposed "compliance-based" approach should be modified to create a baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community.

The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources.

GGNRA should be a partner with the City of San Francisco and other communities, not an adversary. The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods.

The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts ? other park

visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons.

The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. The DEIS needs to provide full disclosure to the public and decision makers.

If dog-related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted.

If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone ? so that an informed decision can be made.

After much consideration, I support Alternative A, the No Action alternative and would also include the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra) in San Mateo county.

The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent.

In addition, the DEIS does not provide site-specific information that these areas are inappropriate for continued dog walking.

Respectfully,

Maud & Joel Trachtenberg. San Rafael, CA 94901

CC: Ken Salazar, Secretary of Interior feedback@ios.doi.gov CC: Jon Jarvis, National Park Service Director Jon_Jarvis@nps.gov CC: Marin Pet Care Association www.marinpetcareassociation.org CC: Crissy Field Dog Group crissyfielddog1@aol.com

ID:**Received:** May,31,2011 00:00:00**Correspondence** E-mail**Type:****Correspondence:** Congressman Pete and Helen McCloskey Rumsey Farms P.O. Box 3
Rumsey, CA 95679

May 26, 2011 Mr. Frank Dean General Superintendent Golden Gate
National Recreation Area Building 201, Fort Mason San Francisco, CA
94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

My husband and I are native Californians with long ties to the Bay Area. We are both committed conservationists; my husband helped draft the Endangered Species Act during his years in the U.S. Congress, and he co-chaired the first Earth Day. We must go on record as strongly disagreeing with the GGNRA's current "preferred alternative" in the DEIS. As the responsible owners of five dogs, we are very dismayed with the significant restrictions on, and elimination of, off-leash dog walking in many areas in the GGNRA. It is our opinion that the proposed regulations making changes to the long-standing 1979 Pet Policy are not fact-based. We do not see well-documented, scientific, monitoring-based facts that can accurately allocate blame specifically to dogs in a site-specific manner that differentiates, for instance, the significant impact of large events, bicyclists, boot camps, homeless people, teenagers, impacts of other species, weather events, etc.

For many people, the companionship of dogs is essential to their well-being, and the healing capabilities of dogs, for instance to veterans, is science-based and well-founded. Yet the new proposed regulations seem clearly anti-dog, and do not serve the public well.

Additionally, it seems unreasonable to eliminate ALL dog walking on any new land additions to the GGNRA. Such decisions should be based on monitoring data and be site-specific. As they are now proposed, such sweeping exclusions are arbitrary. We have hiked in the GGNRA and visited Crissy Field many, many times. We have rarely seen dogs stray into restricted areas- actually, children, teens, and homeless people are more likely errant in this regard. We have never seen any dog be aggressive to any human. There is the occasional very minor dog skirmish, which in our experience has never been more than a vocalization or body posture, which are totally normal and no cause for restrictions such as the ones you are proposing in the so-called preferred alternative. Since 99% of the GGNRA land is already off-limits to dogs and their humans, the restrictions are truly

objectionable. This document presents an "either-or" approach to the conservation of natural habitat and recreational uses. In fact, the vast majority of dog owners are good land stewards who understand the necessity of protecting natural resources. The "preferred alternative" dismisses the responsible majority of dog owners in order to attempt to eliminate a tiny minority of irresponsible ones. A far better approach is to provide clear signage that educates the public on areas of concern. Enlisting the animal welfare, conservationist and dog-owning communities in such an effort could create goodwill and be a constructive way to make the current rules more clear. Education and cooperation are always more effective in increasing compliance than prohibition and regulatory heavy-handedness. Frankly, the document as a whole has an almost adversarial feel to the very nature of the many communities the GGNRA was designed to serve, and sets itself apart from those communities. Because the Draft Environmental Study did not include in its scope the GGNRA's impacts on the urban world to which it is in many areas adjacent, it fails to embrace an essential part of what makes it unique: that it is the wild sibling to a dense, urban world. Yet that urban world is filled with lovers of the GGNRA- dog owners amongst them.

The GGNRA's DEIS and "preferred alternative" seems to miss a world of opportunity in creating communities of interest with those affected by it. This includes the City itself, whose parks will see much greater pressure if the GGNRA further restricts recreational use in the manner it proposes. Where alliances could be built, the proposed "preferred alternative" creates alienation. There appears to be a significant bias against the No Action option. We support Alternative A, with site-specific, monitoring-based analysis on any new land additions to the GGNRA.

Sincerely, Helen and Pete McCloskey

Correspondence ID: 4254 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: E-mail

Correspondence: I write in firm support of the GGNRA's Draft Dog Management Plan.

My husband and I have two dogs and one cat (whom we keep indoors for her safety). We live in our own home near Ocean Beach on the Richmond side. Almost every day, we walk our dogs, on leash, in our beautiful neighborhood, usually in the west end of Golden Gate Park and on the promenade above the beach. Our small back yard is also very convenient for our dogs' hygiene and recreation.

On our usual neighborhood routes ' especially the beach promenade, we

encounter many other people with dogs, most on leash ' no problem. Dogs supposedly under voice "control" are almost always a problem, challenging our dogs, raising the issue of dominance. When the situation is threatening, we usually say something polite and clear to the "handlers" about leash requirements. Typically, they say nothing or else reaffirm their disrespect for regulations.

Looking beyond at the gatherings of loose dogs carousing near the surf, we are dismayed by the handlers' disregard for the safety and peace-of-mind of others: wildlife, birds, children, seniors, disabled, all law-abiding citizens, people seeking safe and relaxing recreation where laws and mutual respect are observed.

Many people are afraid of dogs, on or off leash, and should have areas where they can enjoy recreation, free of fear. Although I love dogs in general, I am often afraid of them in public encounters until reassured or out-of-range.

Once I observed to my husband, "We're so lucky to have a house with an enclosed yard. If not, I don't think I could in conscience have dogs in the city. We'd have to take them out on leash for everything, and they'd get no real exercise, no running and playing. It wouldn't be fair to them." Please note: I would cope by not having a dog, rather than insisting on "my rights."

Communities are, by definition, places where people co-operate, where they give up certain privileges in turn for others gained or shared. When problems of give-and-take arise in communities, people work out compromises and laws ' many for the protection of living things which cannot protect themselves. Many people in the community of SF forget that the GGNRA is a Federal park, subject to requirements distinct from those of a city ' e.g., protecting wildlife, vegetation, and humans.

I think that the GGNRA/NPS have done a good job of working out compromises on these particular issues and have gone far beyond the usual effort to balance the myriad concerns.

One other related issue that I'm not sure has been addressed yet:

In both City/County and Federal parks, a substantial problem is created by professional dog-walkers who pay nothing to use the public parks for their private livelihood. In the process, they endanger people and wildlife, and damage parks. I witness one of these "dog-walkers" who drives daily into Golden Gate Park, parks her van by a large open field, opens the rear door, and watches her charges (usually 6 ? 8 dogs) race to all corners of the field and defecate. She makes no attempt to pick up their waste (it would be impossible to do so), then leads them to a path, where they disappear into

the woods.

Such people should purchase licenses and pay fines for violations. In this particular city, it should be easy for different jurisdictions to co-operate in crafting and enforcing a universal license, then sharing revenues equitably.

Thank you so much for the thorough exercise in democracy which you are conducting.

Sincerely, Cheryl C. Arnold

Cheryl C. Arnold San Francisco, CA 94121-3205

Typed by my husband, John Frykman, and sent on his email.

Correspondence ID: 4255 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Mr. Jarvis,

No scientific studies were done by GGNRA, on Rancho Corral de Tierra (Rancho) lands to justify the validity of the EIS, as it applies to the "New Lands". Where is the soils and geology report? Where is the water quality report? Where is the vegetation report? Where is the wildlife report? Where is the special status species report? Where is the report on our cultural resources? Where is the report on visitor and use experience? Where is the park operations report? Where is the report on human health and safety? Where is the report on sustainability and long term management? In my opinion, this is an illegal EIS for the "New Lands".

Public hearings were promised but not held. GGNRA's preferred alternative for the Rancho is unfair and not truly multi-use. Marin and San Francisco have off-leash and on-leash areas for dogs, San Mateo is being given none.

I have walked my dog alone in the area north of Montara, east of Highway 1, and south of McNee Ranch State Park for 32 years, off-leash and on-leash. During this time there has never been an attempted, or a successful, molestation of a woman walking in this area. It is hilly with lots of trees and dense brush. Women often walk alone here because having a dog with you makes it safe.

Montara does not have a community park or community center for socialization. The area we use to walk our dogs serves both these purposes. If you ban dogs from this area, we will be forced to walk hundreds of dogs

in the narrow streets with no sidewalks, and on Highway 1, to get to the State Park, where dogs are allowed on-leash.

As over 300 residents who walk our dogs in this area, we have put in six poop cans, and keep them stocked with plastic bags. We are self-policing and there is virtually no dog waste on the trails. There is lots of horse poop, and some coyote poop.

If there are any endangered plants or species in this area, they have survived half a century with hundreds of dogs using the area off leash. They are hearty enough to continue to survive with dogs continuing to use the area.

I am requesting that the GGNRA's preferred alternative for New Lands, including Rancho, be changed from alternative D (No dogs allowed) to a "No Change" alternative. Current usage of the land, including dog walking, should continue to be allowed until scientific studies are done indicating that dog walking is harmful to park resources.

A total ban on dogs is unacceptable. Creative multi-use solutions have not been considered. In Washington state, and Santa Cruz, CA, there are off-leash days, or off-leash hours in park areas. We are asking to continue to use approximately 100 acres with our dogs, out of 4200 acres.

At a time when obesity is a national concern, GGNRA is forgetting that the main reason people walk who have a dog, is for the dog's well being. You are encouraging people to stay at home with their dogs, and not walk. Shame on you.

Sincerely, Peggy Bechtell Montara, CA

Correspondence ID: 4256 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Hello,

My comment is that I am in favor of more restrictions on dogs because in my experience wherever dogs are allowed to walk trails on leash, 90% of dog owners will let them off leash. In Tennessee valley I have seen this more

times than I can count on the legal trail and the off limits trails. Dog owners always claim they didn't see the signs or came in from some mysterious trail entrance where there were/are no signs. The same holds true for Rodeo

valley. I regularly see dogs off leash on Rodeo valley trail, or on the illegal upper part (coming from the East parking lot across from the rifle range) where they can get to the legal Miwok trail. Some people I do believe are

genuinely confused, however I have seen on multiple occasions dogs/people crossing a meadow/saddle from Rodeo valley trail to get to Miwok trail, usually with the dogs off leash. I think the Miwok/Coastal trail/

Green Gulch should be off limits to all dogs for the sake of the Bobcats who live there. For me the rights of wildlife will always trump the rights of peoples pets. I am a dog owner myself, but would never think of

taking my dog for a hike on the legal trails because of the wildlife, particularly the Bobcats, as well as of course the Coyotes, Deer, Rubber Boas, native plants etc. I have also seen off leash dogs running through wintering

Burrowing Owl habitat in Rodeo valley. And of course I believe the shorebirds are entitled to rest and feed on the beaches, free from being chased by dogs who are "getting their exercise" because chasing birds is "natural" as it

has been explained to me by multiple dog owners.

I visit the Headlands regularly to photograph wildlife, but I have plenty of photos of owners walking their dogs in illegal areas or off leash in legal areas-maybe they could be useful as evidence.

Thank you,

Kirk McCabe

Correspondence ID: 4257 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: May 30, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Superintendent Dean,

As a Muir Beach resident, I want to go on the record to state that I oppose the Golden Gate National Recreation Area's "preferred alternative" of

banning off-leash dogs from the GGNRA ? particular Muir Beach.

My children are third generation Muir Beachers and we bring our dog Wanda down to the beach all of the time. The kids love it and Wanda absolutely loves it too! She loves socializing with the other dogs as much as she enjoys running free on the beach playing ball or Frisbee or whatever is in store for that day. I can't imagine what it would be like if this were no longer possible. Being able to spend quality time with my kids and dog at Muir Beach is one of life's greatest pleasures. The thought of leaving our dog at home while the rest of the family goes off to the beach is simply sad.

I understand the need to protect sensitive wildlife. I have always considered myself an environmentalist. I just do not think dogs are the problem. First off, there just is NOT clear signage stating the dogs and children should stay out of Redwood Creek. It's just not there. People do not know that it is sensitive habitat and they should stay out. Please consider adding signage to the area around the creek and lagoon and enforcing the laws that are already in existence. It seems a lot less costly.

I also wanted to add that I read in the DEIS that a part of Muir Beach known as Little Beach would remain dog friendly. This alternative would not work for us. My children at 7 and 10 and we do not go to Little Beach on nice days because it's a nude beach and we've encountered too many inappropriate things going on there. PLUS to expect that non-Muir Beach residents take their dogs to Little Beach would not work. As the website KeepMuirBeachDogFriendly.com states: Little Beach" is not accessible without crossing the main beach or driving along neighborhood private roads. Most of the time, the rocks are impassible because of surf and tides. The "social trail" from Pacific Way to the north end of Big Beach is a steep, hazardous, rocky pathway, with no handrails. There is no public parking on Sunset Way or Pacific Way. All spaces are on private property. All lanes are fire lanes. Extra and illegally parked cars would create a hazard for the surrounding community in terms of blocking access to emergency vehicles. For those who would arrive on foot via the road, there are no amenities or services for Little Beach. No trash cans. No toilets. In addition, Little Beach oftentimes has no beach at all during the winter or at high tide. Squeezing people over to that beach for use with their dogs is not a reasonable alternative. Formally stating and implementing such a plan would require appropriate impact studies and input from the surrounding community.

I hope that you will please consider the impact to families and dogs and the GGNRA's "preferred plan" would bring. I encourage you to please keep Muir Beach dog friendly as it has always been. I truly believe that with better signage and the enforcement of existing laws, dogs, dog lover and non-dog lovers can coexist in Muir Beach and other areas of the GGNRA.

Sincerely,

Denise Lamott Muir Beach CA, 94965

Correspondence ID: 4258 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: May 14, 2011

RE: Golden Gate National Recreation Area Draft Environmental Impact Statement

I reside in San Francisco.

I am one of the people most directly affected by the proposed Golden Gate National Recreation Area preferred alternative dog management policy for our beaches and other GGNRA land because I have a dog whom I take each day to Crissy Field. We do not need a preferred alternative to the existing rules; instead, we need to better support the current rules with clearer and better signage throughout the GGNRA about where dogs can and cannot be under voice control as well as a robust educational program partnering with the San Francisco SPCA. We also encourage the GGNRA to use environmental barriers where necessary to delineate and clarify areas.

We must also eliminate the compliance based management strategy that will allow the GGNRA to change the rules for off-leash and on-leash dog walking without further public debate if the GGNRA prevails in its current efforts to install its preferred alternative.

Because our San Francisco beaches (including Crissy Field, Aquatic Park, Baker Beach, and Ocean Beach) are now part of the GGNRA, people from all over the United States think they should have a say in how our San Francisco beaches are managed. When I was reviewing the GGNRA Deis, I noticed this:

In the Advance Notice of Proposed Rulemaking, January 2002, asking for comment on potential options for future dog management in GGNRA 88% of SF residents responding preferred allowing for off-leash dog walking while 95% of out of state respondents wanted to uphold the National Park restrictive laws

I can understand that people from all over the nation want to have a say in how national lands are managed. Yet, we have to be careful not to give too much weight to comments made by people who do not use our beaches on a

daily basis or we will get a distorted view of the issues regarding off-leash and on-leash recreation with dogs in the GGNRA .

People from out of state do not see the level of care of these beaches by dog guardians. They do not see us picking up the trash on the beach each morning. They do not see the ways that we interact with the community to be sure we earn our off-leash and on-leash privileges. They are not here to remember that these beaches were once San Francisco lands or that off-leash and on-leash recreation with dogs was part of the original plan for these lands. They do not know that local foundations have supplied huge sums of money to develop the recreational facilities that now exist and that these families also extended their intentions for use to dogs and their guardians.

Please consider the point of view of the dog guardians who use our beaches on a daily basis and who value the privilege of doing so. Please develop something that works much better than the GGNRA preferred alternative. Please recognize that San Francisco is an exemplary place and that our way is to work together with all the constituents to arrive at a solution that works. The proposed "preferred" alternative will not work.

Sincerely,

JoAnne Tybinka Blasko

San Francisco Resident

District #2

Correspondence ID: 4259 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: It's bad enough the state doesn't allow dogs in all of their parks(except the parking lot and restricted paved areas). PLEASE DON'T bar dogs from national recreation areas too. We won't have anywhere we can go. If you're worried that off leash dogs will molest wildlife - have a leash requirement JUST IN THOSE AREAS. People who love the outdoors love their dogs too. The number of parks that accepts dogs is too limited. If you're arguing that dogs make a mess - look at Baker Beach, which is very clean. All you need to do is provide enough trash cans and bags. Help us please! Don't lock us out.

Correspondence ID: 4260 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Please enact common sense rules that enforce dog leash laws and restrict dogs from sensitive areas. Wildlife habitat and people before dogs in the GGNRA. Thank you for your ongoing efforts in this regard.

Correspondence ID: 4261 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: E-mail

Correspondence:

Mailing Address sean buckley santa rosa, california 95404 usa

Please keep all dogs ON LEASH in your park areas. Everyone thinks that their dog is harmless and alot of them are but .. many dogs attack other dogs, children and adults. Of prime concern is the animals that live in the parkland amd MUST be protected from these unwanted intruders and killers. Please do not succumb to DOG MILITANTS. You are guardians of this recreation area, of the people and of the wildlife. Someone or their child mauled by an off leash dog might be able to sue and get quite an award if your rules allow off leash dogs. Most of all, rules are only as good as their enforcement, and in times of budget cuts, we are always looking to save money and that might mean less enforcers of the rules on Federal lands. Please enforce ON LEASH rules for the public safety and for the wildlife in these beautiful areas. This not to mention the annoyance of stepping in dog poop as you hike down a rustic trail.

Thank you, Sean Buckley taxpayer

Correspondence ID: 4262 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: E-mail

Correspondence:

Dear GGNRA Superintendent Frank Dean and National Park Service Director Jon Jarvis, I am writing to express my concern about the new GGNRA Dog Management /Environmental Impact Statement (DMP-EIS) plan to exclude all dogs from "New Lands" which would apply to POST's Rancho Corral de Tierra property. I am requesting that this land be managed under Alternative E (allows dogs) rather than Alternative D (bans all dogs). I live in Montara and have been walking my dog in the open space next to Montara for many years. It is a wonderful community of hikers/walkers, mountain bikers, equestrians and dogs who for decades have shared the land and treated each other with respect and courtesy. For the decades of use and the large number of people who access it (including dog walkers), it is a

testament to the care and concern of the community that the land, water shed and wildlife are remarkable well kept and thriving. I was upset to see that GGNRA has decided, without inputs from the local community (other than one meeting at Farallone View where the majority of the people spoke overwhelmingly in favor of allowing dog access), to ban all dogs from the property. In my opinion, this is not only unjust to the local community and doesn't support the established mixed use, but is not founded on research or analysis. I am concerned that it will not be safe to force dog owners who want to access McNee State Park to walk half a mile on Highway 1 rather than walk across the old railroad grade or old roadway and trail from Montara. I have not seen reports that indicate that the pads of dog's feet are more damaging to the terrain than horse's hoofs, hiker's boots or mountain bike's tires. My husband, a botanist, was a "volunteer of the year" for POST for his many hours of analysis of plant communities on various POST properties. He has led groups on the Rancho and ironically, he and other volunteers often brought their dogs with them. Aren't there many options available for this property, from defining areas where dogs can't go, to areas where dogs must be on leash (like McNee), to areas designated for dogs under voice control? Please reconsider your decision to ban dogs because, with this ban, you ban hundreds of people from this land as well. Most of GGNRA land (and State and County parks as well) do not allow dogs. Given the unique nature of GGNRA's urban/park interface, the Rancho, with its established successful mixed use model, would be an ideal place to continue to allow dogs. It is important to have some percent of the park open to dog owners who make up a large portion of the local population. GGNRA is not only for the pleasure of overseas and out-of-state visitors but for the local community who support and care for it. Regards, Shelly Smith Montara, CA

Correspondence ID: 4263 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I support the preferred Alternative to the Muir Beach portion of the GGNRA Dog Management Plan. The impact of dogs, especially off leash, to wildlife is real. There have been virtually no shorebirds or other marine birds resting on Muir Beach (in the 16 years in which I have lived in Muir Beach) except very early in the morning before dog walkers arrive (very early on Saturdays, especially). Without dogs on the main beach, there is a possibility of actual nesting of some shore species and those which could nest in the front lagoon. Dog owners have many other areas to walk dogs including all of the community of Muir Beach, the county "Little Beach", and of course nearby areas such as the Tamalpais Watershed and Oakwood Valley. I also appreciate the enforcement element of the plan, as there is currently almost no enforcement of the leash law on nearby trails, with

additional pressure on wildlife. As a lifelong dog owner myself, I understand the desire to let dogs roam free on the beach, but we need to keep the public US beach open to non-dog lovers and wildlife as well.

Correspondence ID: 4264 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Bonnie MacKenzie Muir Beach, CA 94965

I am a dog lover and understand dog owners desire to take dogs anywhere they are allowed to walk. However, some areas are sensitive and need to be protected. There are plenty of nearby dog friendly areas to Muir Beach so closing Muir Beach to dogs is only a minor inconvenience to dog owners. Closing the beach will also reduce the number of professional dog walkers from other areas who bring many dogs at once to an area with children and people who are not fond of dogs. I support the preferred alternative recommended for Muir Beach.

Correspondence ID: 4265 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Subject: Comments on the GGNRA Dog Management Plan

I am particularly qualified to comment on the Draft Dog Management Plan EIS for the following reasons. I am a professional ecologist with a doctorate in ecology from the University of California at Davis. I have over 25 years of experience assessing impacts to native plants and animals and sensitive habitats from a variety of projects. Some of my recent projects include newly constructed and upgraded trails.

I have a concern regarding the effect of dogs and people on the behavior of wildlife and use by wildlife of lands of the Golden Gate National Recreation Area. Because of a dog's acute sense of hearing and smell, they are able to search for and encounter wildlife that would ordinarily escape detection by humans. In addition, I have observed many times during my recreational use of open space lands, dogs flushing and otherwise disrupting wildlife behavior. The owners of the dogs are either oblivious or encourage such behavior. Off leash dogs are particularly destructive because they chase wildlife.

In addition to the direct displacement of wildlife, the odor of a dog can deter wildlife from using a particular area thereby reducing the size of the

GGNRA available for use by wildlife. Barriers to wildlife movement, by either the physical presence of dogs or the odor of dogs, are particularly detrimental when they reduce the movement of wildlife from one area to another.

I have examined the proposed alternatives for a number of the GGNRA sites and Alternative C appears to reasonable balance resource protection with access to dog walkers. I have the following specific comments.

OAKWOOD VALLEY FIRE ROAD AND TRAIL. Alternative B would be better for wildlife than Alternative C because of the absence of fencing proposed along both sides of Oakwood Valley Trail. A fence would prevent wildlife from crossing from one side of the trail to the other side thereby providing a barrier to the movement of wildlife. Especially for small areas of habitat, such as the Oakwood Valley area, it is important that wildlife have access to as large an area as possible and no area should be precluded from use by fencing. Dogs should be on leash along the Oakwood Valley Fire Road and Trail.

MUIR BEACH. Alternative B, in which dogs would be on leash, should be implemented for this area to protect sensitive habitat (tidal lagoon, dunes, beach, and Redwood Creek) and associated wildlife from disturbance by dogs.

MARIN HEADLANDS TRAILS. Alternative C appears to protect wildlife by removing dogs from some trails and allowing leashed dogs on other trails. Some areas of the Marin Headlands should be protected from dogs because of the value of the Marin Headlands to bobcats. In addition, the habitat of the endangered Mission blue butterfly should be protected by excluding dogs or restricting access to dogs on leashes.

HOMESTEAD VALLEY FIRE ROAD AND FUTURE CONNECTOR TRAILS. The Homestead Valley Fire Road and future connector trails should be restricted to dogs on leash, if dogs are to be allowed at all on this trail to protect wildlife habitat.

CRISSY FIELD WILDLIFE PROTECTION AREA. Dogs should be excluded from the Crissy Field Wildlife Protection Area because the presence of dogs is not compatible with protection of wildlife. As stated above, dogs disrupt wildlife and reduce wildlife use of areas.

OCEAN BEACH SNOWY PLOVER PROTECTION AREA. Dogs need to be leashed along the adjacent trail to the Snowy Plover Protection Area to prevent disturbance to and killing of snowy plovers by off-leash dogs.

OCEAN BEACH. Dogs should be prevented from entering the area south of

Sloat Boulevard to protect snowy plovers.

FORT FUNSTON. Alternative C should be adopted to protect nesting bank swallows.

SWEENEY RIDGE. Dogs should be excluded from Sweeney Ridge to protect the habitat of the Mission Blue butterfly and other wildlife.

MILAGRA RIDGE. Dogs should be restricted to leashes on the fire road, trail to overlook and Woorld War II bunker, and the Milagra Battery Trail future connector to lower Milagra) to protect the Mission blue butterfly.

MORI POINT. Dogs should be restricted to leashes on the Coastal Trail, Old Mori Point Road, and beach within GGNRA boundary to protect sensitive native grassland habitat and habitat of the California red-legged frog and San Francisco garter snake.

MONITORING COMPLIANCE. Compliance of the proposed Dog Management Plan should be vigorously enforced for the plan to be effective. Compliance would require staff to educate users of the regulations, monitor usage, and issue citations to offenders. If compliance is not enforced, then wildlife and sensitive habitat will be harmed.

Please contact me at the above address or at if you have any questions.

Correspondence ID: 4266 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: E-mail

Correspondence: Mailing Address Kathy McCorkle San Francisco, CA 94127 USA

I am retired, and like to run and play ball at Crissy Field with my dog, who also loves to swim there. We go about 3-4 times a week, and it is one of the things that makes SF an enjoyable place to live. At Crissy Field, dogs AND people (walking, jogging, bicycling, sailboarding, etc) seem to get along quite well. I cannot understand why we should be restricted, since we have never caused any problem for anyone, or any THING. I always pick up after my dog and put her on a leash when we are around people picnicing. Otherwise she runs off-leash, and is able to get the exercise she needs. The time we spend at the beach is essential to our health and well-being.

Correspondence ID: 4267 **Project:** 11759 **Document:** 38106

Received: Apr,15,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Re: Public Comment in Support of Most Restrictive Proposed Revisions to GGNRA Dog Policy

Dear Mr. Dean:

Thanks for the opportunity to comment on the proposed revisitations to the GGNRA Dog Policy. I am urging you to go forward with the most restrictive proposed rules on dog access to these areas.

I am a twenty three year resident of San Francisco, living in the Sunset District with my wife and two elementary school aged kids, who attend public school here. I regularly surf at, and take my kids to Ocean Beach, and take my kids to the beach at Chrissy Field and China Beach. We also go to Stinson Beach on a regular basis. Additionally, I enjoy spotting and trying to identify the unique variety of coastal bird life we enjoy, especially at Ocean Beach and the new Chrissy Field marsh.

My concerns are based on numerous negative personal encounters, as well as concerns for preservation of the natural environment, especially related to bird life.

Last year I saw an off leash terrier sneak up on a tern standing at the surf line, near Sloat Blvd. at Ocean Beach. The terrier grabbed the Tern, shook it hard a few times, while the owner watched and ineffectually tried to call the dog off. After several shakes, it dropped the Tern. The bird's wing appeared to be broken, it could not fly, but limped to the water, dragging the broken wing, and then floated about in the surf. I called the Park Police, and about forty five minutes later a Park officer drove by, looking out the window, and kept going.

I regularly see people playing fetch with their dogs in the closed Snowy Plover area, sometimes while the owner remains aloofly on the concrete promenade, while the, dog runs around in the sand. Also, I have had countless experiences at the beach where dogs run up to me and my kids, off leash, and oblivious to the repeated calls of the ineffectual owner. Clearly most dogs are walking the owners, and not vice-versa. And then there is the dog poop in the sand, which, aside from being a hazard to barefoot walker, raises dangerous bacterial levels in the sea water, which is a danger to surfers, and kids playing in the surf-line alike.

Though many dog owners take the possission that there should simply be stricter enforcement of existing rules on controlling their animals, it's become clear to me over the years that it is simply unreasonable to expect law enforcement to respond in a timely manner to the multitude of violations of the rules by dogs and their owners. Dogs brought by their

owners to the City are unfortunate in having been placed in a cramped location with limited space and places to run. There is, and always will be a sizable group of dog owners that have no control, or don't care, about what their dogs are doing; many act as if they feel that their dogs are members of their family, and that others need to adjust their expectations to allow for their dogs unruly behavior. Consequently, when me or my wife has asked owners to leash or control their dogs, we commonly get dismissive or even aggressive responses. This spoils the beach for us, for the wildlife, and the minority of dog owners who exercise real control over their dogs.

I urge you to continue with your efforts to restrict dog access to the GGNRA.

Thank you for your attention to this matter.

Regards,

David Elliott Wise

Correspondence ID: 4268 **Project:** 11759 **Document:** 38106
Received: Apr,15,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Dog Management Plan Draft EIS

April 14, 2011

Frank Dean, Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, California, 94123-0022

Dear Superintendent Dean,

I want to add my voice to the draft plan. I strongly urge you to continue to allow certain areas (e.g. Crissy Field & Muir Beach) as "off-leash" areas and to allow on-leash all areas currently open to dogs. Please, no more restricted areas.

Director Jarvis calls for open space as a major source of public health. Walking dogs -under control- is an important way to provide public health!!

The GGNRA is just that -an urban recreation area- NOT WILDERNESS- so please maintain & promote urban recreation opportunities!

Thank you,

Barbara Boucke

Correspondence ID: 4269 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 00:00:00

Correspondence Type: Letter

Correspondence: To Whom it May Concern,

Thank you for allowing public comment on the DEIS. I completely support placing tighter restrictions on dogs using Golden Gate National Recreation Areas. I believe they are needed to protect the snowy plover and all wildlife in these areas. Dogs should be kept out of parts of San Francisco's Crissy Field, Ocean Beach and Fort Funston, and I agree with Michael Lynes that the proposed rules don't go far enough.

As a senior citizen, I don't feel safe when dogs are allowed to run free. I have been bitten, had my food taken, water shaken on me and had dogs running between my legs causing me to fall, while owners of the dogs did nothing to prevent these occurrences. And the owners disrespect posted signs and get defensive when they are pointed out.

I have never heard of any dog owners getting cited for violations. There has to be monetary fines for violations, especially repeat offenders. And all dogs should be licensed.

Sincerely,

Theresa Day

Correspondence ID: 4270 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 00:00:00

Correspondence Type: Letter

Correspondence: April 12, 2011 Mr. Frank Dean GGNRA Superintendent 201 Fort Mason Bldg. San Francisco, CA 94123

Re: Park Police/Ranger Patrol on Horseback Dear Mr. Dean:

I am writing as I am very concerned about a GGNRA (or Nat'l Park) park ranger patrol using horses at the Crissy Field beach area. This area has allowable off-leash dog use and the practice of patrol on horseback seems like an unnecessarily risky practice with potential for injury to dogs and/or their owners.

Many dogs (especially "city dogs") have not seen a horse before. Seeing a very large, unfamiliar animal in their midst is bound to create some interest or alarm, may cause the dog to run over to the horse to see it better and may include warning barking. Park rangers have warned dog owners whose dogs start approaching to keep dogs away to avoid getting kicked. In one incidence, a friend's dog was PEPPER-SPRAYED by a park ranger because the dog was approaching and barking. The ranger did not wait for the owner to come over and get the dog. I know this dog (a sweet, mellow Lab)he is not aggressive in the least'he was just alarmed. The owner subsequently got the pepper spray on herself as well as her two young children (in trying to clean off the dog at home). Completely inappropriate response by the park ranger.

Because of this, I am very alarmed when I see a mounted park ranger at the beach. I go to the beach about 5 times a week. I always grab my dog until the horse passes by to avoid anything happening to him. However, I can't always see the horse approach so sometimes the horse is close by the time I see him. My dog is a well-behaved, non-aggressive dog (a Lab) and also not familiar with horses.

I just don't understand why the park rangers would continue this behavior. I can only guess at a few options:

1) They consider the enjoyment of riding the horses by the beach more important than the welfare of dog owners and their dogs, who have a right to be there. 2) They are trying to limit dog use at the beach (via their formal proposal document), so they are purposely trying to incite "bad" dog behavior. 3) They think that people like to see the horses. I would agree however they can do it at another location where there isn't a concern about dogs being injured.

Whatever the thought is, the practice is completely irresponsible and unacceptable.

I would appreciate if you could send this along to the proper group. I love horses but respectfully request they discontinue horseback patrols by off-leash dog areas. There are many other ways to patrol that area (by car, bike or on foot).

Thank you for your time.

Allison Mortimer

Correspondence ID: 4271 **Project:** 11759 **Document:** 38106
Received: Apr,14,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Dear Superintendent,

Good government means protecting the public, especially kids, from dogs running unleashed on Ocean Beach and other properties administered by GGNRA. Good government also means protecting the general health of the public from those animals whose owners are irresponsible and never pick up after them.

Sincerely,

M. Dajani

Correspondence ID: 4272 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 00:00:00

Correspondence Letter

Type:

Correspondence: March 7, 2011

Dear Mister Frank Dean,

I'm writing you this letter urging the GGNRA to amend the proposed plans and to provide more off-lead recreation areas for dogs and their owners, open new lands to dog walking and take a more commonsense approach to enforcement without enforcing a new law against everyone, because of a small minority that are irresponsible pet owners.

We must Also encourage responsible guardianship of our environment and I know that we can protect endangered species and habitat by educating park users & enforcing laws in existing and new areas that have been sectioned off as "habitat preservation areas" without the need to section -off even smaller portions of the parks just for dogs.

I have learned that for over thirty years, the current Pet Policy has served the park, its users and the environment well. The GGNRA remains one of the best-preserved and much-beloved collections of open spaces in a major urban area. We readily accept that this plan should evolve over time to adapt to a changing population, After reading the proposed plan it is clear that the GGNRA's proposal represents a major departure from the current successful model and is overly-restrictive to dogs and their owners!

We should be seeking ways to make the San Francisco Bay Area friendlier to dogs and their owners. It is my strong opinion which is one of many thousands of people living in the bay area let alone the city of San Francisco

who agree that the GGNRA's proposal is a heavy handed, even draconian step backwards for animal and public welfare in the Bay Area.

Regards,

Doyle McCullar

Correspondence ID: 4273 **Project:** 11759 **Document:** 38106

Received: Apr,19,2011 00:00:00

Correspondence Type: Letter

Correspondence: Subject: Dog Freedom

Have been reading what the GG folk wish to do to dogs that enjoy unleashed freedom and I say: I have an 82 lb Lab Service Dog. I am unable to exercise him on leash via a bike or running or even a fast walk. He loves his swim and running on the beach chasing balls. He works hard and deserves his play time and needs his exercise. He is whistle trained and your area is among one of the very few that has, in the past, allowed this freedom. Northern Calif. is notorious for there bad attitude towards pet owners. It is embarrassing to try and explain to out of towners about our areas leash law. I encourage your group to consider the feelings of we the people that share our lives with dogs. They too deserve our best. Margie Sikes and Service Dog Joey

Correspondence ID: 4274 **Project:** 11759 **Document:** 38106

Received: Apr,18,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean: As a resident of San Francisco, CA, I am writing you to express my earnest concern regarding the Draft Dog Management Plan released by the Golden Gate National Recreation Area ("GGNRA") on January 11, 2011.

Currently, 1% of the GGNRA-controlled land allows for dogs to be off leash and under voice control. If the proposed plan is passed, it will effectively eliminate the off-leash areas of over 90% of that 1% and will significantly change usage and enjoyment of this recreational area for the thousands of dogs and dog owners in the city. If passed, it will also have an extremely negative impact on the population/usage of existing city parks and neighborhoods, which would be forced to absorb the overflow from GGNRA-controlled land.

I am asking that you please apply pressure to the GGNRA to revise their

current plan, for which a vote will be held on May 29, 2011. Imposing such measures will have significant negative impacts to my daily life and to that of my community.

I would be happy to discuss my point of view with you or your office. I can be reached at or at. Thank you very much for your attention to this matter.

Best Regards,

Julie Herman

Correspondence ID: 4275 **Project:** 11759 **Document:** 38106
Received: Apr,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

I realize you will be under a lot of pressure in trying to please many people and organizations concerning the "Dog Management Plan" for GGNRA.

I have lived near the Presidio for over 30 years and utilize Baker Beach, Lake St. Park, Crissy Field, the hidden trails of the Presidio and the Marin Headlands at least once per week -

I encourage GGNRA to re-strict and regulate trails for dogs. They should always be on leash in these areas. I have seen dogs near seals on the beach. I am greatly concerned about the wildlife in the GGNRA. Dogs should be on leash and there should be designated areas for the dogs.

Thank you,

Kathryn Hyde

Correspondence ID: 4276 **Project:** 11759 **Document:** 38106
Received: Apr,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Frank Dean,

I usually walk daily both in Crissy Field and Ft. Mason.

There is a large impact on both the Plant life + bird population especially in Crissy Field since so many dogs have taken over the area.

The general increase of usage of the area has also had an impact. I think it would be better for people to use Parks in their own area, so this would cut down on the impact on a few parks. Since they wouldn't have to drive as far it would also help with global warming.

I no longer enjoy using Crissy field due to all the Dogs, Boot Camp fitness groups and other scheduled activities. I was knocked down by a runner in the recent 1/2 Marathon race.

B.G. Christman

Correspondence ID: 4277 **Project:** 11759 **Document:** 38106
Received: Apr,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Off-leash dog incident of violence occurring, April 8, 2011

Gentlemen:

I have reported the above-referenced incident to the Park Police, Officer Budd, but I wish to report an incident which happened on that day and call to your attention, in as strong a way as I can, the violence pedestrians are suffering as a consequence of unleashed dogs brought to the Presidio by dog walkers.

I regularly walk on the service road which connects Mountain Lake Park with the Presidio Golf Course. This was true at 10:00 AM on April 8, 2011. At the same time, a very large pack (between 10-20) of very large dogs (such as Labrador retrievers) , handled by only two dogs walkers, was unleashed and running at top speed on the dirt section of the area adjacent to the service road. The pack suddenly decided to veer onto the service road and became a virtual tsunami of dogs running down the road toward me. This onslaught could not be avoided. One of the animals which were running shoulder to shoulder hit me straight on at full force. (When I described what happened to Officer Budd, she commented that she has experienced the same thing on mounted patrol. She acknowledged how difficult it is to avoid such an onslaught and how hard it has been to keep her horse under control and herself from being thrown off the horse and injured.)

I was upended like a bowling pin, my body slammed to the pavement, with the entire front of my body taking the full impact. Everything hurt. I could not immediately assess my injuries because the entire pack of unleashed dogs swarmed me and I immediately had to cover my head with my arms to protect my head and neck from any other possible harm. It was a terrifying

moment. The dogs were not on voice command at all. I had to wait for what seemed an eternity while one dog walker pulled each and every dog away from me, leashed them and handed them off to the other dog walker. When the last dog was finally pulled away, I got up, dazed and in shock. To my amazement I had no broken bones, but I had plenty of bruises and a very bad headache. Only one of the two dog walkers identified herself: Aimee Porter. She apologized and then said that the animals had been "spooked" as a way of explaining why they ran into me. When she said that, I realized that I was not dealing with anyone who had the appropriate amount of skill and knowledge to be dealing with animals which can be. as we know all too well in San Francisco, lethal weapons. Dogs don't get "spooked". Deer get "spooked"; ducks get "spooked". Animals of prey get "spooked". Predators do not get "spooked". Predators engage in hunting and predatory activity. Running after prey is a predatory activity. That is what these unleashed, uncontrolled dogs were doing when they assaulted me. Dogs are predators.

When I picked myself up. I had a mouthful of dirt from the impact and from having to lie with my face on the ground to avoid the dog swarm. Since that is an area frequented by dog walkers, the area is a regular canine cesspool, where the dogs deposit urine and feces in heavy quantities. My clothing was covered in dirt. I have bruises on my chin, arm, knee and other areas. My glasses, which are expensive bi-focals, were scratched.

I was very lucky. Because I didn't hit a different part of my head on the asphalt, I am able to write to you instead of being on life support in San Francisco General hospital. I am only 5'1" tall. There are many far more fragile people than I walking that service road and the risk to them of severe injury from unleashed and uncontrollable dogs is great.

There should be no off-leash dogs in this area of the Presidio. There are just too many pedestrians on that service road and the dog walkers are not capable of keeping these incidents from happening. The dogs want to run and they regularly run at and upon pedestrians.

I have spoken with both the dog walker and with the woman who owns the dog which assaulted me. (Kelley Petersen). Neither seems to take this incident very seriously. The owner, in particular, seems not to believe her animal capable of this behavior and insists that her dog is a "happy dog". The dog walker seems to feel this incident is a fluke or an act of God. Neither woman was willing to give me her address so that I could mail her a copy of this letter. Both said don't feel comfortable doing that." This is cowardly and irresponsible.

This is the second time in two years that I have been subjected to violence from off-leash dogs in the Presidio. Two years ago, I was walking our family dog ON A LEASH in the Presidio. Our dog was a 17 pound mutt

which looked like a miniature golden retriever. She was smelling some flowers when she was attacked, out of the blue. by an off-leash Akita. I watched my animal get torn to bits by this vicious Akita. The Akita's owner happened onto the scene some moments into the attack and it took her a great deal of time, beating and screaming at her own dog before the Akita could be pulled off. We both sustained bite wounds trying to save my dog. The owner mentioned that she was surprised that the Akita attacked because the Akita hadn't attacked anyone for at least a year. (!!)"We have tried to train her to use her `soft mouth'"she told me. I rushed our dog to the veterinarian where emergency surgery was performed. Although the Akita's owner paid the vet bills, our pet never recovered and died a few months later.

When I tried to report this incident to the Presidio Police, they referred me to San Francisco Animal Control. San Francisco Animal Control insisted it was not their jurisdiction. Both agencies pointed the finger at each other and ultimately, nothing happened! The only thing that happened is that a dangerous, vicious Akita undoubtedly still runs off-leash in the Presidio.

In my opinion, the dog owner in the April 8th incident entrusted her pet to an unqualified dog walker. That dog did not run at me in a vicious way. That dog, like the other dogs, was having fun running around uncontrollably. The owner thinks that because she has such a "happy dog" that the dog is incapable of hurting someone. She claims the dog weighs "only 30 pounds" (something I question) but the weight of the dog is irrelevant if the dog projects himself like a guided missile. If I had been a brick wall instead of a human being. the dog would be dead. such was the force he exerted on impact.

I have not followed the controversy concerning unleashed dogs too closely, as time has not permitted. The press reports appear to be more concerned with the potential or actual damage to wild flora and fauna than to injury to humans. This is very disturbing to me. Unleashed dogs represent a major threat to walkers, hikers, children, the elderly, etc.

I am looking forward to working with Officer Budd on the specific April 8 matter. In the meantime, I would appreciate it if you would send these comments to any appropriate venue where the issue of off-leash dog running along the Presidio wall and that service road is being considered. I really don't want anyone severely injured or killed. but that is where this current policy is going.

I now walk with my Leki walking sticks, which I usually reserve for wilderness walks. but which I now feel I must walk with in order to use them in self-defense. Pedestrians in San Francisco and in the GGRNA should. NOT feel that they can only walk if armed. I hope that this matter

can be addressed as soon as possible.

Sincerely, CE Boots Whitmer

CEW:bms cc: Officer Budd San Francisco Board of Supervisors PAR

Correspondence ID: 4278 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 00:00:00

Correspondence Type: Letter

Correspondence: Attn: Dog Management Plan

Dear Sir:

We have visited many parks during our lifetime and we believe that dogs really should never be off a leash. In fact, it would be best if animals were not allowed at all, but that may be impossible to expect with the way people feel about their animals.

We are most concerned with the impact on the flora and fauna in our parks. There is much pressure on parks today from too many people, and then to have them bring their dogs too, is most disconcerting.

We want wild and untouched areas, in addition to the resident wildlife, to be available to be enjoyed by our children, grandchildren and others who come after us.

It is too dangerous to allow any dog to roam without a leash. One never knows when a dog may bite, especially a child whose face is close to the level of the dog's mouth. Even adults may feel uncomfortable when approached by an unfamiliar dog.

It is not fair to those who use the parks to have to deal with the issue of unruly dogs off a leash, who may be running hard and inadvertently knock a child or an elderly person to the ground. Also who wants listen to barking dogs or step in dog excrement and drag that around on a shoe to one's car? Nor is it fair to place a burden on the staff to ride herd on people who do not obey the laws.

If something must be done, then an enclosed grassy area, where people are obliged to pick up after their pets, seems like the best solution. If they don't pick up, then only dog owners will have problems. This way the dog owners may be the ones to enforce the pickup rule when they see others not complying.

Ideally the area would be located away from most of the people who come to visit without pets. That way, those who wish to enjoy the visit will not be bothered by the loss of peace and quiet caused by barking dogs, or the danger they pose.

Thank you for allowing us to comment on a problem we have had to deal with in the past in a campground. It is most unpleasant!

Sincerely, Judith & Gerald Arnold 418 Aiken Road Shelbyville, KY 40065

P.S. We sent the above statement to The National Park Service in April, 2006 and it seems we were correct in who was most likely to be injured by dogs according to an article from Consumers Reports on February 3, 2011, which stated that "hospitalizations due to dog bites have risen dramatically in the last 15 years: up 86 percent since 1993.

"The dog-bite victims most likely to be hospitalized were young children and seniors.

"The number one reason for hospitalization is infection, other injuries and complications range from open wounds on the extremities and wounds on the had, neck and body to fractures and blood poisoning.

"These dog bites are taking a real bite out of our collective wallets; the average cost is more tan \$18,000 per patient and \$54 million overall."

While the article states that those who live in rural areas were 4 times as likely to visit the ER and three times as likely to be admitted than urbanites, what about all the other victims?

Who would be libel if there were a lawsuit if someone was bitten or mauled? The National Park Service, and, ultimately the taxpayers?!

JA Enclosure Hospitalizations for dog bites on the rise

Correspondence ID: 4279 **Project:** 11759 **Document:** 38106
Received: Apr,14,2011 00:00:00
Correspondence Type: Letter
Correspondence: Comments on the Dog Management Plan Draft EIS

Dear Superintendent Dean:

Thank you and your staff for tackling this difficult and important issue. You have it right in my view. The public land manager must weigh the social and

environmental consequences of each decision and ensure that, while seeking to create quality recreation opportunities for as many visitors as possible, that the health of a thriving ecological landscape is restored and preserved.

I have a few points which I hope will contribute to support the decision:

-Dogs, even on leash, disrupt wildlife activity and relationships. The sight (and/or sound) of a predator species (including dogs) can significantly alter and damage predator/prey relationships.

-Dogs, even on leash, can cause a variety negative impacts on the "contact with nature" experiences of other visitors. Visitors are less likely to witness wildlife where dogs are present with the likelihood decreasing when there are uncontrolled dogs present. For many, encounters with dogs, even when the dogs are physically restrained, is a distraction and cause for fear and anxiety for self or for children.

-Dog waste can cause biological contamination.

-In defense of dog owners: for many of the 40% of Americans who own dogs, their pet is a member of the family and sharing outdoor experiences with it is a source of great joy and satisfaction. Places in the public commons for these types of human/pet experiences should be made available and maintained....but....because of the impacts both socially and environmentally, the share of public lands open to dog users, ethically must be kept small.

Public lands are to be managed to offer the greatest benefit to the greatest number in perpetuity. Many public lands uses are legitimate, but few of the many legitimate uses are legitimate on every acre of public land. In my career as a National Forest land manager, I came to see that an ethical land use allocation model existed for public lands....it goes like this "When allocating public land areas for recreation use, one's share of the commons is inversely proportional to the invasiveness of his activity" If a beautiful public space is occupied by dog users, there are many other potential visitors who will choose to self exclude from that area...leading to what many, myself included, would say is an unfair allocation to one group at the expense of others. Places for dog owners can be set aside, but they should be selected to avoid excluding dog averse others from the nicest and most scenic spots.

I should add that I am a dog owner. Our two lab mix dogs are friends and members of our family and we love to take them for walks and to share the outdoors with them in areas where it is legal and ethical to do so. Ethical dog owners choose to leave their dogs behind wherever encounters with numerous people is likely or where natural plant and animal communities

seem at higher risk....even when no legal restriction would prevent dog presence.

Thank you for your public service and for this opportunity to comment

Sincerely, BOB WETZEL Murphys, CA

Correspondence ID: 4280 **Project:** 11759 **Document:** 38106

Received: Apr,19,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

As a long time resident of San Francisco and a devoted dog owner, I want you to know I think your plan to severely restrict off-leash dog walking in Golden Gate National Recreation Area is a terrible idea. Please count me as strongly opposed.

While we visit a number of locations in the GGNRA our favorite spot is Crissy Field, and I think your Alternative C is unwarranted and unfair. Crissy Field is such a wonderful place to go to socialize with other dogs, other dog walkers and with people who just love being there. Living in a city like San Francisco there are very few places where I can take my dog to run and play. The East and Central beaches are wonderful for that and we never have any trouble with other dogs or with people who do not have dogs.

I have looked at the telephone survey that is a part of the environmental study and cannot believe anyone would rely on it for anything. When nearly 50% of the people did not know how long they had lived in the Bay Area, how reliable do you think they could be. Furthermore, if you wanted to have a fair survey why would you ever do it right after the trial involving the terrible death of Diane Whipple? Also, why did you have a survey conducted by Northern Arizona University, a state notorious for strange results? It is also curious that you included Alameda County in that survey; over 40% of those respondents had never been to Crissy Field. California is full of great state universities and colleges, why not support California and use one of them?

As a taxpayer and voter I am very concerned that you would waste our precious tax dollars on such an unnecessary effort.

Nevertheless, if you insist there must be more restrictions placed on dogs at Crissy Field then make dog walkers put their dogs on-leash while walking on the promenade. Leave everything else just as it is now (Alternative A).

Incidentally, if you would spend a small fraction of the money you have wasted, and will continue to waste on this study, to install some "keep-out" signs and maintain the fences around the dunes, dogs and people would not go on them.

I sincerely hope you will drop Alternative C and allow dogs and their walkers and owners to continue to enjoy the GGNRA in harmony with other visitors. If there are a few bad actors penalize them, not all of us.

Sincerely, Suzanne Ornelas

Correspondence ID: 4281 **Project:** 11759 **Document:** 38106
Received: Apr,15,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: GGNRA Draft Dog Management Plan/Environmental impact statement

Dear Superintendent Dean:

After spending in excess of 100 hours reading and analyzing the GGRNA's Draft Dog Management Plan/Environmental Impact Statement (hereinafter the "EIS" or "the Dog Plan") along with the 2002 Northern Arizona University Social Research Laboratory (hereinafter "NAU") telephone survey, I have decided to share with you observations, comments, questions and recommendations set forth in the pages to follow.

INTRODUCTION

First, allow me to digress briefly to provide some personal background. My wife and I are proud residents of San Francisco, unfailing taxpayers, conscientious voters, dedicated advocates for the preservation and restoration of the environment, grateful fans of our National Park System, frequent visitors to Crissy Field, and obedient dog owners. By profession I am a lawyer, mediator and arbitrator and as such firmly believe litigation should be the last form of dispute resolution. As a student of the law and the Constitution and a proud American citizen I steadfastly believe every citizen has the right and obligation to petition the government for change when it has or is about to embark upon an unjust or unwarranted course of action; and so I proceed.

Many of the observations I will share are from the perspective of someone who visits Crissy Field at least 200 times per year. As a senior citizen whose health care providers have long stressed the importance of regular exercise my dog and I visit Crissy Field four to five times a week. We typically spend 1 1/2 to 2 hours walking 4-5 Central beaches then up to and along the

Promenade out to Fort Point. Upon reaching the westernmost point we then basically retrace that route and then extend it as we leave East Beach going over to Mason Street up to the Marina, then over to the yacht club and back to the eastern parking lot. During each walk I make a token repayment to the NPS for our hours of pleasure by picking up and disposing of several pieces of debris, primarily non-biodegradable, and any unattended dog deposits we might find; the latter fortunately being an infrequent encounter despite what the authors of the EIS have suggested.

My walking companion and four-legged best friend is on-leash while on the walkways and Promenade and off-leash while on the beaches. We only go on to the Western Beach during the few weeks when off-leash walking is permitted. We also seldom venture onto the grassy sections of Crissy Field because in the winter they are like a swamp, and in the summer its uneven terrain and thousands of gopher holes are, for a senior citizen or anyone with an unsteady gait, a sprained ankle or broken hip just waiting to happen. I will comment further about the grassy area when specifically addressing your stated preference for Alternative C.

Except for some general provisions in the EIS, my observations, comments and recommendations will focus on Crissy Field. While I may disagree with several of the statements, conclusions and recommendations contained within the EIS and the NAU telephone survey, it is not my intent to be disagreeable or be culpable of "verbal abuse" as referenced in the EIS, Page 287.

OUR PREFERRED ALTERNATIVE

Of the five Alternatives listed we clearly prefer Alternative A as it maximizes the ability of dogs and their walkers' to exercise, socialize and enjoy many of the wonderful attributes of Crissy Field. In my experience as a long time dog owner, there is a far greater propensity for dogs on-leash to become combative with each other than when they are off-leash. Many dog experts refer to this phenomena as "leash aggression". Unfortunately humans sometimes wind up in the midst of those conflicts. Incidentally, as a frequent visitor to Crissy Field while reviewing Map 10, Alternative A, I was very surprised to see the West Bluff Picnic Area designated "Leash Required." The surprise came because there are no signs anywhere around the perimeter or within that picnic area designating it as a "Leash Required" area.

A review of Alternative C quickly reveals that it would severely limit the existing rights of dog owners and walkers. In many respects it appears to be engineered for failure. While readers are able to visually compare the various editions of Map 10, it is unfortunate the authors of the EIS did not include the square footage or acreage differences between the five

alternatives. I suspect if the area lost to off-leash walking was presented in the EIS in terms of square feet or acres the differences between the existing situation (Alternative A) and your preference (Alternative C) would be staggering.

Question: Do you have those numbers and are you willing to share them with the public?

As you probably know, at high tide, on Central Beach there is very little dry beach left between the water line and the fenced dunes. By sending all off-leash dogs into what will become a congested beach area you would substantially increase the likelihood of trouble that does not currently exist. Dogs like many other animal species, including humans, are known to become increasingly agitated and intimidated in crowded, confined spaces.

Alternative C would create or engineer adverse conditions at Crissy Field that do not currently exist; namely, two areas of "Intensive Use" by dogs where none currently exist, and a significant potential for adverse consequences thereof. Consider for example the following provisions of the EIS that appear at pages 14 and 15:

"Vegetation Issue. Dogs, particularly those off-leash and without adequate voice- control, can potential trample and denude vegetation and interfere with native plant species. Through intensive and prolonged use of park sites, dogs may reduce the abundance and diversity of native plant communities, resulting in the loss of rare or unusual plants (see the "Species of Special Concern" section below for listed species)..." EIS,14 (Emphasis added).

"Wildlife Issue. intensive dog use of an area could disrupt its use by wildlife or degrade the habitat, resulting in a multitude of possible negative consequences for wildlife population viability. The adverse effects of intensive dog use, such as chasing and flushing wildlife or disrupting nesting and foraging sites, can range from direct to less direct disturbance from physical effects such as trampling of habitat, degradation of water quality, and scent intrusion into predator territory. Off-leash dogs can potentially injure or even kill shorebirds or other wildlife..." EIS,15 (Emphasis added). Supporters of Alternative C might argue that in addition to Central Beach there would also be the center section of the Crissy Air Field for off-leash dogs. There are however significant problems with that argument. Those include, but are not limited to:

1. Alternative C substantially reduces the area within the Air Field that would be available for off-leash use;
2. Throughout the winter months the area is like a swamp and very difficult and unpleasant to use;
3. Its terrain is very uneven, and marred by literally thousands of gopher holes making it a dangerous place to tread, particularly for seniors and anyone with any kind

of walking disability; 4. Like the Central Beach, these are the most remote locations within Crissy Field from vehicular parking, again making it increasingly difficult for seniors and people with disabilities to use; and 5. By substantially reducing the on-leash space within the Air Field you would create an "Intense Use" area and with perhaps unavoidable instinctual violations of the Guidelines for ROLAs (Appendix E).

In view of the problems referenced in items 2-4 above it is little wonder the authors of the EIS at Page 106 have observed that it is "...a relatively underused section of the site."

As for item.#5 above, by concentrating dogs into a much smaller area of the Air Field you would create or engineer another opportunity for failure. Gophers currently far outnumber any other occupants in those fields. By closing large sections of beach and two of the three sections of the Air Field to off-leash dogs you would again create an "Intense Use" area that does not currently exist. And when you put a large number of dogs in an area heavily occupied by gophers, you substantially increase the likelihood the dogs are going to hunt for those rodents just as Mother Nature and humankind bred them to do. Such resultant behavior will then cast them as "uncontrolled dogs" and thus prohibited from the GGNRA.

The Guidelines for ROLAs (Restricted Off-Lease Areas) are set forth in Appendix E of the EIS. They provide in pertinent part:

"...Any uncontrolled dog is prohibited. Dogs in a ROLA are to be kept under control at all times. Dogs are considered under control when they are within direct eyesight of the owner/guardian/handler and when they have the ability to immediately return to their owner/guardian/handler. Dogs are presumed to not be under control if they:... intentionally or unintentionally annoy, pursue, hunt, harass, harm, wound, chase, attack, capture, or kill wildlife,... - dig, destroy vegetation, or enter fenced or closed areas.."

Query whether the criminal defense of "Entrapment" might apply to dogs?

Speaking of destroying vegetation, the potential for which is referenced in a number of places in the EIS, particularly as to the restricted dune areas, such potentials could all but be eliminated if the surrounding fences were adequately maintained and appropriate signage was provided. While few dogs are literate, people, unaccompanied by dogs, are frequently seen inside the poorly fenced dunes enjoying views of the bay, making cell phone calls, picnicking, frolicking, etc. (all occurrences I have personally observed). Fences not only make for good neighbors they also protect vegetation.

The following four photos were taken on the mornings of April 4 and 5, 2011 at Crissy Field. They depict a few of the many locations where the

fences intended to protect the dunes on the Central Beach are in a state of total disrepair. Photos 1 and 2 show areas where I have in the past seen families picnicking on top of the dunes. On April 4, 2011 as I was approaching the dune area in Photo 2 I saw a man standing on top of the dune talking on his cell phone; he was not accompanied by a dog. Please note the absence of and type of keep-out signs in any of those photos.

Recorded Incidents Involving Dogs in 2007 and 2008

As I read through the many hundreds of pages of the EIS and the NAU report I was frequently reminded of the words of Scottish poet Andrew Lang:

"He uses statistics as a drunken man uses lamp posts - for support rather than for illumination".

Consider first Table 6 in the EIS at Page 230 entitled "RECORDED INCIDENTS INVOLVING DOGS IN 2007 AND 2008." Of the 21 locations contained within the GGNRA 12 locations had recorded incidents involving dogs during the two year period 2007 and 2008. Crissy Field Wildlife Protection Area was one of those 12 areas. In that 24 month period it had a total of 20 reported incidents, 17 of which (85%) involved dogs entering enclosed areas. The other 3 were dogs "disturbing wildlife" whatever that means. Simply maintaining the currently existing fences and providing appropriate signage might well have eliminated most, if not all, of those incidents.

At Page 30 of the EIS under the heading "Encounters with Unruly/Aggressive Dogs" the authors paraphrase some portions of a 2001 task force study of the American Veterinary Medical Association (AVMA) about the number of reported dog bites in this country annually and estimated costs thereof, including workers' compensation claims. There are no reports or statements anywhere in the EIS of any injuries to park staff or employees due to dog bites or attacks. In the midst of all of those seemingly damn dog statistics appears one statement specifically related to GGNRA, and unfortunately it is misleading, if not outright false:

"...At GGNRA, reported incidents of encounters with unruly/aggressive dogs include instances of visitors being knocked down, intimidated, and bitten by dogs. In 2007/2008 a total of 52 violations were given for dog bites or attacks at the GGNRA, park sites as recorded by GGNRA LE and U.S Park Police". (Emphasis added).

The statement "... In 2007/2008 a total of 52 violations were given for 02 bites or attacks" is simply not true.

A review of Appendix G to the EIS, "Law Enforcement Data for 2007 and 2008", shows an entirely different set of facts. In 2007 GGNRA (LE) Law Enforcement Rangers issued one (1) Warning for a "Bite/Attack" and no/zero/nada (0) Warnings for "Bite/Attack" and two (2) Citations (one at Lands En and the other at Fort Mason). In 2008 the GGNRA LE issued no/zero/nada (0) Warnings and no/zero/nada (0) Citations for "Bite/Attack". In the same year (2008) the USPP also issued no/zero/nada (0) Warnings or Citations for dog "Bite/Attack".

Therefore the real number for the two-year period 2007 and 2008 of "total violations....given" was two (2) Citations and one (1) Warning, not the 52 as represented by the EIS. What the authors of the EIS did in coming up with their 52 number was to count all reports of "Bite/Attack", 50 of which did not have any LE or USPP direct knowledge or verification, and nevertheless were represented by the EIS authors as "violations...given."

I will also note that none of the Warnings or Citations were issued at Crissy Field; while five (5) unverified "Bites/Attacks" were reported over those two years. No information has been provided as to whether anyone was actually was actually injured in any of the recorded incidents.

In referencing the previously mentioned AVMA the authors of the EIS chose not to include other information that might be of interest to you and /or other readers. For example, nationally one-half of all bites are inflicted by the family dog, and only about 10% of bites are inflicted by dogs unknown to the victim. (AVMA Task Force, 1741).

Also, according to the task force "...Intact (unneutered) male dogs represented 80% of dogs presented to veterinary behaviorists for dominance aggression, the most commonly diagnosed type of aggression. Intact males are also involved in 70 to 76% of reported dog bite incidents." That is information that might actually be of some practical use to you in formulating your off-leash regulations.(AVMA Task Force, 1733).

Northern Arizona University Social Research Laboratory Telephone Survey

In support of the proposition that the presence of dogs needs to be substantially restricted within the GGNRA, the EIS makes multiple references to a 2002 telephone survey conducted by the Northern Arizona University Social Research Laboratory. This survey was reportedly conducted at the request of the administrators of the GGNRA. I say "reportedly" because as a review of the NAUSR's website for the period May 1999 to February 2006 reveals, their Clients List does not include GGNRA or the NPS. The clients listed are:

-US Forest Service -National Science Foundation -Metro Chicago

Information Center -National Loss Prevention Institute -Arizona State Supreme Court -Arizona Department of Health Service -Navajo Nation - Grand Canyon Trust

A search of their website also failed to reveal the NAU Dog telephone study referenced in the EIS. It did show that of all of the research and reports they performed in 2002 involved issues pertinent to some locale in Arizona, all but one which involved specific issues pending at the university or within Coconino County where the university is located.

A copy of the survey report can however be found through a GGNRA website. When considering that telephone survey it is important to keep in mind a number of facts that may bring into question its validity and applicability to 2011 and the future. This is not a current survey; it was conducted nine years ago, between May 20 and July 2, 2002. At that time existing park regulations prohibited all off-leash dog walking in GGNRA and the people surveyed were so informed (Survey Question #11).

The focus of the telephone survey was of off-leash dogs and the timing (May 20 to July, 2 2002) could not have been worse for Man's Best Friends. At the time the survey was underway Bay Area residents for over a year had been fed almost daily news reports about the tragic January 2001 death of Diane Whipple; a San Francisco woman who had been viciously mauled by two pit bulls as she attempted to enter her apartment. The dogs were living with two neighbors of Ms. Whipple; their owner, a skinhead gang member was at the time serving a life sentence in prison.

Publicity surrounding the Diane Whipple case was so intense that the trial, was moved to Los Angeles out of concern that the defendants could not receive a fair trial in the San Francisco Bay Area.

As reported in an October 13, 2001 article in the SF Chronicle: "Last month [Judge] Warren decided to move the trial after a survey by two professors at California State University at Chico found that 71 percent of potential jurors surveyed in San Francisco had concluded that the couple were definitely or probably guilty. The survey also found that 97.1 percent had heard of the case."

The trial commenced in January 2002 and a guilty verdict on all counts was returned on March 20, 2002 (SF Chronicle 03/21/02). In early April the police released recordings of the 911 call on which Diane Whipple's screams and dog barking could be heard (SF Chronicle 04/3/02). Those calls were played on numerous local TV and radio stations throughout the Bay Area and the nation.

As if the pre-survey publicity had not been bad enough, right in the middle

of the survey period two more major media events relating to that mauling death occurred; on June 16, 2002 the trial judge ordered a new trial on the murder conviction of one of the two defendants. (SF Chronicle 6/17/02); and the next day the prosecutor in the case was quoted as saying the reversal was "a travesty" (SF Chronicle 06/18/02).

With all of that publicity at that time in the Bay Area the majority of people might well have voted to put Snoopy on-leash and banned Lassie from the park for barking at Timmy who had inadvertently fallen to the bottom of a well.

But the timing and age of the survey, and the format and content of some of the questions are not its only apparent flaws.

For reasons that were not addressed in the NAU report or the EIS, the people surveyed included not only residents of the three counties in which the GGNRA is situated (San Francisco, Marin and San Mateo), but also residents of Alameda County. Of those Alameda County residents surveyed 58% had never been to Crissy Field (NAU p. 38). And although in the first page of the report it is stated that 1600 people in total were surveyed, 400 residents of each county from the actual call tallies that 457 of the responders (28.6%) were from Alameda County (NAU p. 147), and 412 (25.8%) (NAU p. 147) were from San Mateo County (of whom 43% had never been to Crissy Field. (NAU, 46).

We are also told that 76.4% of the people who had never visited the Golden Gate National Recreation Area were opposed to off-leash dog walking anywhere in the park. (NAU, 138): 70.8% of the people who had not been to the park in at least the preceding 12 months were also opposed to any off-leash dog walking.

Some of their math is also hard to rectify. For example consider the numbers in this segment of the NAU report:

"Results of the telephone survey showed that 28 percent of respondents owned or cared for one or more dogs. Among these dog owners, 50 percent had taken their dog(s) to a GGNRA site and 20 percent of that group had also hired a commercial dog walker to walk their dog(s) in a GGNRA site, which translates to one percent of all survey respondents using a commercial dog walker". (NAU 2007b, 16-17).

Using old time math: 28% of responders owned or cared for dogs; 50% of those had taken their dog to GGNRA (50% of 28% would typically equal 14%). When I was in school twenty percent (20%) of that number (14%) would equal 2.8% not one percent as stated in the NAU.

Another example of fuzzy math appears under the heading VISITOR EXPERIENCE:

"In a random telephone survey conducted by Northern Arizona University in the four-county area surrounding GGNRA (Marin, San Francisco, San Mateo , and Alameda Counties) respondents were asked a series of questions regarding their use of GGNRA. Of the 29 percent of respondents who either owned or cared for a dog about half (14 percent) had walked their dog(s) at GGNRA. Of the 14 percent of respondents who walked dogs at GGNRA, approximately 75 percent lived in San Francisco County and 69 percent lived in Marin County...." (NAU 2002b, 17). (EIS 279) [Old mathL $75\% + 69\% = 134\%$]

The weight to which the NAU survey might be entitled is further suspect when one considers that 42% of their Responders when asked if they had lived in teh Bay Area for periods shorter or longer than six years did not know (NAU, 51). Perhaps another reason the names of the Responders were not disclosed.

Does the EIS Reflect a Latent Anti-Dog/Anti-Dog Walker Sentiment/Slant?

In reading through the EIS and the NAU reports we were struck by a precieved bias against both dogs and their owners and/or walkers. As a dog owner who feels acceptance of Alternative C would have a significant detrimental impact on the quality of my Life and the life of our much loved family dog, perhaps I am simply being paranoid; but as a wise man once said: "Just because you are paranoid does not mean they are not out to get you".

In addition to the errors and misinformation previously identitled, a few other examples of this bias include the following:

Under the heading of "EXPECTATIONS AND VIEWS OF DOG WALKERS AND OTHER VISITORS" is set out a brief discussion of the January 2007 ANPR wherein an overwhelming majority (71%) of public comments supported off-leash walking in selected. GGNRA sites. In purporting to summarize the sentiments of opponents the authors included this very caustic and inappropriate partial quotation from an unnamed source:

"..Nearly half expressed discomfort or fear of off-leash dogs and over 1,180 felt that allowing an exception to the NPS rules would set a negative precedent in other NPS units, giving "dog owners the excuse they want to contine to not obey laws and create confusion and conflict" (NAU 2002a, 9-15) (EIS, 13) (Emphasis added).

I respectfully submit the included partial quote that I italicized was unnecessary and inappropriate because if in fact "an exception" was made to the NPS rules dog owners would not need an "excuse...to not obey laws" because the authorized exception would then be within the law.

Other examples of a perceived bias appears in the segments I have bolded and italicized in the section entitled Visitor Use and Experience - Aesthetics: Issue. Dog walkers and visitors without dogs often come into conflict. Walkers, hikers, joggers, bicyclists, horseback riders, wildlife watchers, and those seeking a quiet and natural experience can all potentially be disturbed by running and barking dogs. The potential for visitors to be bitten by dogs at GGNRA also exists and is discussed as part of employee, visitor, and dog health and safety, which follows this section...Although signs indicate that dog owners are responsible for picking up their dogs' waste, owners do not always comply. Various dog groups and associations have even organized dog cleanups, provided bags, and tried to influence their members; but despite these efforts, many dog owners still do not comply with picking up dog waste. (EIS, 18).

Questions:

-Where is the evidence to support the assertion "...often come into conflict"?
-The fact dogs, like many other animals have teeth, do present a "potential" for biting, but where from the evidence are we shown that "potential" has in fact been a reality that surpasses any other setting or circumstance in which man and dog are present together? -Is there any evidence that the incidents of dog bites in GGNRA is greater than in other areas of the City and County of San Francisco? -On the topic of picking up dog waste, the reader is first told "owners do not always comply" but in the next sentence we are told "...many dog owners still do not comply." Where is the evidence in the EIS to substantiate that statement? It is not in the TABLE 6. RECORDED INCIDENTS INVOLVING DOGS IN 2007 AND 2008 (EIS, 230) nor in TABLE 9. SUMMARY OF VISITOR USE AND PET-RELATED CITATIONS, WARNINGS, AND REPORTS TAKEN AT GGNRA (EIS, 271) where at the 11 San Francisco locations a total of four (4) "Pet Excrement" incidents were recorded, none of which were at Crissy Field. - Also on the topic of dog waste, the fact that dog groups have organized "dog cleanups," weren't those general beach cleanups? And "provided bags" and "tried to influence their members" seems to suggest that the efforts of those groups is evidence of culpability, and it further implies the groups' members are in fact the ones who are non-compliant. Is there any evidence the offenders were members of the dog groups that undertook to "influence" their members?

Further examples of a perceived attempt to skew the EIS appear in the section entitled "Crissy Field" (EIS, 276). The statements at issue have been

bolded and italicized by this author.

"...The NPS recently installed new fencing, gates, and signage at the eastern boundary of the WPA to better demarcate where dog walking restrictions start. Gates and signage were also installed at trail entry points to the WPA. Crissy Field is busy as early as 4 a.m. and receives moderate to high visitor use throughout the day. Visitors include individual and commercial dog walkers, cyclists, pedestrians, rollerbladers, runners, wind surfers, and kite boarders (table 9). Within the WPA, visitor use is high; however use is low to moderate for visitors who walk dogs. Park staff estimates that there are generally 5-10 commercial dog walkers per day (fewer on weekends than weekdays), and typically 3 present with between 4 and 6 dogs each at any given time of the day. These dogs are often off-leash, as are many of the dogs walked by owners. Compliance with seasonal leash restriction in the WPA is limited; varied iterations of regulatory signs have only been partially effective..."

"Maintenance is also demanding, with dog waste, urination on trash cans, vandalism of signs, etc. occurring regularly at this park site..." (EIS, 276).

In the first highlighted section the authors appear to have inter-mixed information about WPA (Wildlife Protection Area) and the other areas of Crissy Field in such a manner as to easily cause the reader to conclude there are "5 to 10 commercial dog walkers per day..." within the WPA and that there is frequent unauthorized off-leash violations within the WPA; when in actuality commercial dog walkers are not typically in the WPA nor is there any evidence there are "frequent unauthorized off-leash violations within the WPA".

TABLE 6 which is said to represent the total number of recorded incidents involving dogs for the two year period 2007 and 2008 shows at Crissy Field in that time frame there were a total of 17 incidents of dogs in enclosed areas reported. That means there were 17 incidents in 730 days or one incident every 43 days. It is hard to believe that an unbiased observer would quantify that as "frequent".

Referring back to the above highlighted portion of the "Crissy Field" section, we should also consider for a moment the statement: "Maintenance is also demanding, with dog waste, urination on trash cans, vandalism of signs, etc. occurring regularly at this park site..."

That assertion however does not appear to be supported by the record. Specifically, I refer you to table 10 of the EIS at page 285.

TABLE 10. "TOTAL MAINTENANCE AND LABOR HOURS AND COSTS ASSOCIATED WITH TRASH REMOVAL FROM OCTOBER

2006 TO APRIL 2008". A review of Table 10 contains the following information for four San Francisco locations within GGNRA: Maintenance Labor Hours Total Labor and Materials Costs Ocean Beach 814 \$26,102 Fort Funston 1,665 \$44,510 Lands End/Fort Mitey 539 \$13,592 Crissy Field 226 N/A For some reason the dollar costs for Crissy Field was N/A (Not Available) but we can generate some approximate numbers by taking the total Labor and Materials Cost For Ocean Beach, Fort Funston and Lands End/ Fort Miley (\$84,204) and dividing that number by the total Maintenance Labor Hours at those three locations (3018 hours). This gives us an average per hour cost of \$27.90. Applying that average to Crissy Field's 226 hours the total Labor and Maintenance Cost for Crissy Field would be approximately \$7,952 and for discussion purposes round it up to \$8,000 for that 18 month period. As we know Crissy Field is open 365 days per year; the approximate daily average cost at Crissy Field for trash removal labor and materials from October 2006 to April 2008, was \$21.92. Finally on the issue of bias let us look at the section entitled "STAFF" wherein we see that dog owners are now apparently profiled and presumed to be "confrontational" when approached concerning an alleged violation. In the final sentence of that section we see that administrators consider some public feedback they have received in meetings and in correspondence to constitute "abuse". Hopefully this is not the explanation as to why the administrators have chosen Alternative C, an alternative that appears to have several built-in opportunities for assured failure.

Park staff (particularly LE staff), volunteers, and partners have been targets of physical and verbal abuse by dog owners who have been contacted regarding pet violations in the park. Conflicts typically occur when a dog owner is contacted regarding violation of a pet regulation. Conflicts are more likely in park areas of high use and elevated conflict levels, such as Crissy Field and Ocean Beach. Due to the increase in LE and visitor conflict regarding compliance with pet regulations following the park's efforts to initiate enforcement of the NPS leash regulation parkwide in 2001 and for safety reasons, rangers now approach visitors in pairs when contacting them about enforcement issues. It is assumed by staff that any contact with a dog owner regarding dog walking regulation compliance will be confrontational, and it is the park's goal to reduce the number of these conflicts (Coast, pers. comm., 2006). There has been one reported physical assault of a federal LE officer by a dog owner (no injuries resulted). Conflicts also occur in the form of verbal abuse at public meetings, and through written correspondence. Park administrators, including the superintendent, have been subjected to such abuses. EIS, 286-287

From a reading of the EIS one might assume dog owners and walkers are perhaps nearly as suspect within the GGNRA as masked men brandishing assault weapons.

Question: How do the recorded incidents of warnings, citations and reports of dog owners and walkers compare with the total reember of warnings, citations and reports involving visitors to GGNRA? How many non-dog related warnings, citations, and reports were there of actual or alleged violations of park rules, regulations and laws during the same time periods?

Question: Is Alternative C in Conjunction with the Compliance-Based Management Strategy a Planned Two-Step Process to Eliminate All Off-Leash Dog Walking in GGNRA? Is This Simply Administrative Pay-Back Against Those Who Previously Sought and Received Judicial Intervention?

From what has been discussed in the preceding pages, we are quite concerned that Alternative C may have been engineered, either intentionally or unintentionally, to fail; or more accurately stated, engineered to assure the dogs and their owners and/or walkers fail. Putting a large number of dogs in very confined spaces creates a substantially higher risk there will be far more problems than currently exist. If in fact there are more problems than those in charge will then feel free to invoke the punitive aspects of the "Compliance-Based Management Strategy".

In chapter 2 of the EIS the CBMS process is generally described. Later in the EIS we are told in summary: "...Compliance-based management strategies has been designed to ensure that compliance with the Code of Federal Regulations (CFR) applicable to dog management is high to ensure protection of park resources, visitors, and staff. If noncompliance occurs at a site, compliance-based management strategies would be implemented to increase compliance with the new dog management regulations. Noncompliance would include dog walking within restricted areas, dog walking under voice and sight control in designated on-leash dog walking areas, and dog walking under voice and sight control outside of established regulated off-leash walking areas (ROLAs). When noncompliance is observed in an area, park staff would focus on enforcing the regulations, educating dog walkers, and establishing buffer zones, time and use restrictions, and special use permit (SUP) restrictions. If noncompliance continues and compliace falls below 75 percent in a management zone (measured as the percentage of total dogs/dog walkers observed during the previous 12 months not in compliance with regulations), the area's management would be changed to the next more restrictive level of dog management. Impacts from noncompliance could reach short-term adverse; but the compliance-based strategy is designed to return impacts to a level that assumes compliance, as described in the overall impacts analysis, provide beneficial impacts where dog walking is reduced or eliminated".

Unfortunately as described this process could be easily abused by those charged with administering the process. There does not appear to be any

systematic method planned, as opposed to "random"

Question: From a Cost/Benefit Prospective Does the Entire GGNRA EIS Process Make Any Sense or is it a Solution In Search of A Problem?

Let's look at the numbers. We have seen above that the average cost per day at Crissy Field for trash removal including labor and materials is somewhere in the range of \$23.00. We also find in the EIS that "...In 2006, total personnel cost for the natural resources staff was \$1,344,392 and total natural resources volunteer time was 142,890 hours. Approximately 5 percent of the natural resources budget was spent on dog management-related activities in 2006 (NPS 2007d, 1)". (EIS, 284).

In Table 11 "Current (Alternative Estimated Personnel Costs" are the total EIS estimated costs incurred by the GGNRA on an annual basis for "dog management". Personnel costs include labor related to resource monitoring, education and public affairs, enforcement, record keeping and data management, maintenance, and contract labor. Non-personnel costs may include equipment, vehicles, computers, etc., necessary to perform duties associated with dog management. The total estimated annual costs for the entire GGNRA is \$203,422. (EIS, 1567).

Question: What has been the total dollar costs incurred thus far by the GGNRA and other federal, state, and local agencies to this date for this EIS process; \$1 Million; \$2 Million; \$3 Million?

Question: Will United States taxpayers ultimately be responsible for paying these millions of dollars in costs?

Question: How could the GGNRA and other governmental agencies have applied that money to make the GGNRA even safer and more pleasing environment for the public without significantly modifying Alternative A?

Without knowing the answers to those questions we are told in order to implement a new dog management plan, Alternative B, C, D or E, even more money will have to be expended. Specifically we are told it would cost between \$1,085,169 and \$1,512,082, the equivalent of what the GGNRA would spend over the next 5 to 7 years under the current Alternative A for all costs associated with "dog management". Instead the money would be spent:

"To implement the dog management plan, the NPS would hire part-time and seasonal employees and full-time permanent employees in addition to the current staff at the park. Additional personnel would need to be hired in several divisions under all alternatives. Table 12 provides the total estimated costs associated with personnel and labor (including new employees) to

complete tasks necessary for implementation of the dog management plan. Personnel costs include labor related to compliance monitoring, education and public affairs, enforcement, record keeping and data management, maintenance, and contract labor. Non-personnel costs may include equipment, vehicles, computers, etc., necessary to perform duties associated with each alternative and are also provided. Overall, there is little difference in total costs for each action alternative due to the efforts associated with compliance-based management strategies and the variety of dog management under each alternative. The addition of new employees would create long term minor adverse impacts on the current park budget. Division budgets would also increase beyond the cost of new personnel to cover increases in current staff workloads and field and equipment costs, including vehicles, computers, etc., creating negligible impacts to long-term minor adverse impacts on current division budgets. If new funding becomes available, impacts would be minimized". (EIS, 1569).

Compliance-Based Management Strategy

When all is said and done, the future of dogs walking in the GGNRA will live or die based upon how the proposed Compliance-Based Management Strategy is established and administered. If administered fairly and efficiently it could work to the benefit of all visitors to the GGNRA. If on the other hand it is administered without transparency and a legitimate opportunity for public participation and verification, it will serve as a lightning rod for dissension and in all likelihood years of litigation. The cornerstone to all of this is the legitimacy of the planned monitoring for establishment of baselines and levels of non-compliance with park regulations.

The stated purpose of the Compliance-based Management Strategy is to: "...encourage compliance with sections of the Code of Federal Regulations (CFR) applicable to dog management, and ensure protection of park resources, visitors and staff. it will provide the framework for monitoring and recording observed noncompliance with the applicable sections of the CFR, including the new 36 CFR Part 7 special regulation, and will guide use of park resources to address those violations. Noncompliance with federal regulations related to dog management will be met with a range of management responses. (EIS, 63).

Under the heading of Frequently Asked Questions we are told how the baselines will be established and monitoring conducted:

"5. What are some examples of the compliance-based management strategy in practice at different periods in time? a. Month 15 of the plan implementation: The monitoring team visits a specific area at random times of the day and week. The team will count the total number of dogs, dog

walkers and types of use (on-leash, voice control) over a pre-set monitoring period, while also recording the number of violations in each zone contained in the area. This information will be compiled with the preceding months' monitoring data to develop a cumulative total number of dogs and violations. Information gained through monitoring will direct use of park resources to initiate primary management responses as required. In 3 more months the monitoring team will have 12 months of data to evaluate, to determine if a secondary management response is warranted.

b. Month 18 of the plan: The monitoring team has continued to visit this specific area - random times of the day and week, following the same monitoring protocols as noted above. If compliance falls below 75% based on the previous 12 months' monitoring data in one of the zones, in spite of the park's primary management actions, the zone will change to the next most restrictive dog management regulation." (Emphasis added). (EIS, 66).

Perhaps it is simply a matter of semantics, but because the establishment of baselines has such critical importance, one would think the National Park Service would want to be extremely diligent in using its very best efforts to assure the information collected is as accurate as possible, and that the data would be collected systematically and scientifically rather than performed "randomly".

As "the next most restrictive dog management regulation" below voice control or off-leash is on-leash followed by "no dogs," justice dictates this must be a fair and open process. Much like a death sentence, the proposed CBMS provides that once a restriction is imposed it cannot be reversed even if behaviors substantially improve.

RECOMMENDATIONS SPECIFIC TO CRISSY FIELD

RECOMMENDATION No.1: Adopt Alternative A; rather than further restricting dog walking in GGNRA use some portion of the hundreds of thousands of dollars that would otherwise be expended to implement the Compliance-Based Management Strategy to instead repair existing fencing and where aesthetically appropriate install additional fencing and signage to help protect vegetation, dunes and wildlife.

RECOMMENDATION No. 2: Should Alternative A be deemed unacceptable by the administrators of the GGNRA, then I reluctantly submit for your consideration an Alternative not included in the EIS. That alternative would contain all of the same elements for multiple user groups that have been heralded by the EIS authors (set forth below) as making Alternative C the best option:

"Overall, alternative C provides the best option for multiple user groups to

experience the site; space is available for dog walking on-leash, dog walking under voice control, and a no-dog experience. It is anticipated that clear geographical boundaries would aid visitor understanding and compliance with the regulations. Since alternative C provides multiple options, it would be easy for park staff to direct park users to a site that meets their use needs." (EIS, 106). (Emphasis added).

Under the proposed Alternative F the locations and proportions are somewhat different but the three elements (dog walking on-leash, dog walking under voice control, and a no-dog experience) are all present. It is also superior to Alternative C in that it would be far less onerous for seniors and others with mobility restrictions wishing to enjoy the experience of dog walking under voice control.

PROPOSED ALTERNATIVE F (as in Fair) for Crissy Field: On-leash: The Promenade; and all roadways, walkways, paths, parking lots, the West Bluff Picnic area, the multi-use trail along Mason Street, and the Wildlife Protection Area east of the old Coast Guard pier. Off-Leash/Voice Control: The Air Field (use could be restricted for special events), and the East and Central Beaches No-Dog Experience: The Wildlife Protection Area aka West Beach west of the old Coast Guard pier.

GGNRA-WIDE RECOMMENDATION

RECOMMENDATION No. 3: If the NPS selects any of the Alternatives B through E for GGNRA's 21 locations then it actively should enlist the assistance and cooperation of recognized and respected dog groups in the community to recruit responsible volunteers to participate fully in all monitoring projects in each of the 21 locations. Meaningful public participation and confirmation of the baselines and monitoring will go a long way towards achieving wide scale acceptance of the results.

CONCLUSION:

Contrary to the vehement assertions of my dog and his canine friends, I do not accept the theory that Garfield the Cat is the real author of the EIS. I also do not agree with their arguments that because children dig more holes and chase more birds than dogs do then children should be either leashed or banned from GGNRA. Clearly no rational human being would ever advocate for such a restriction.

Where we do agree however is there are a number of reasons to view the EIS and the NAU telephone survey with a great deal of skepticism.

After careful analysis the facts and numbers simply do not justify the major changes called for by the authors of the EIS. Alternative C would create

significant "intensive Use" problems that do not currently exist, and the accompanying Compliance-Based Management Strategy would provide far too many opportunities for unjust administrative abuse.

It is therefore respectfully submitted that the best and most responsible approach would be to adopt the current Alternative A; stop the unnecessary spending of hundreds of thousands, if not millions, more tax dollars on this process; and instead use a small portion of those funds to repair, replace and improve what is already in GGNRA.

Surely at a time when our nation and its economy is facing so many problems the management of the Golden Gate National Recreation Area has more constructive and positive things to do with its time and ever dwindling financial resources. The current EIS endeavor might cause some in Congress to believe the GGNRA was over-staffed and over funded. As friends of the GGNRA we know neither is true.

Sincerely yours,

Karl A. Keener

cc: Congresswoman Nancy Pelosi Mayor Ed Lee San Francisco Board of Supervisors

Correspondence ID: 4282 **Project:** 11759 **Document:** 38106
Received: Apr,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Dog Management Draft Plan

Dear Superintendent Dean,

Firstly, let me say how grateful we are for the GGNRA. It is a rare and marvelous place enhanced by a multitude of creative and hard working people. I give thanks weekly to Phillip Burton and those who later conceived the Presidio Trust.

I have volunteered at the Maritime Museum, on trails, in habitat restoration and at the Presidio Nursery. We have been members of the William Kent Society/GGNPC for over 20 years. And thank you for your service to the country, the NPS and the GGNRA--some days you have a thankless task.

Current dog use of the GGNRA is unsupportable. At Fort Funston the spider web of dog trails has caused significant erosion. We have watched dogs chase shorebirds at Ocean Beach. Some people have a fear of dogs. I know

those who avoid Fort Funston and Crissy Field Beach because of the large number of unrestrained dogs running around. Most importantly, unrestrained dogs are a threat to wildlife, including endangered species like the Snowy Plover.

So I write to express our strong support for the recommended alternative in the NPS Dog Management Draft Plan. The Park Service's recommended alternative is a careful, reasonable, well researched and thoughtful.

We also hope the ultimate plan will address what Edward Abbey might have called "industrial dog walkers". On volunteer habitat restoration work in the Presidio we sometimes encounter people with 10 or more pooches in tow. Not only are that many dogs in a group intimidating to those who fear dogs, such treatment is unfair and maybe not humane for the dogs themselves. And one can only wonder how dog walkers of large groups deal with dog feces and urine. Packs of dogs must also be unsettling to wildlife, even if leashed.

We have written to our Supervisor Scott Weiner in support of the recommended alternative. We read of his critical comments in your appearance before the Board of Supervisors last week. San Francisco has been a leader in encouraging residents to change their behavior to benefit the environment (recycling/composting and parking restrictions/bicycling enhancements come immediately to mind). Change viewed as restrictive can be painful, but people with dogs should put other humans and protecting the environment first. And San Francisco should be in the forefront of encouraging such change.

Thank you for your consideration.

Sincerely,

Robert Cornwell and Cathryn Thurow

Correspondence ID: 4283 **Project:** 11759 **Document:** 38106
Received: Mar,29,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I was dismayed to hear about the plans to end the dog of leash selected areas.

There are so few areas for dogs to obtain the exercise they need in SF.

As a qualified animal behaviorist I know firsthand of the problems that are encountered when owners are not able to exercise their dogs in a manner

that allows them to use all their energy. More problem behaviors, more dogs ending up in shelters.

The problem is many of the dog walkers with unmanagable amount of dogs. I was at Fort Funston and wathed at 1 dog walker with 21 dogs was on the beach. This is where problems happen. Last Wednesday on Baker Beach a walker had 16 dogs. By not addressing the real issue + that is unlicensed dog walkers who will never be able to pick up after or control a large amount of dogs.

I am a responsible dog owner and behaviorist who knows the importance of exercise. I pick up after my dogs, they do not chase animal + are friendly to people + dogs. I should not be discriminated against due to irresponsible dog walker.

Ocean Beach has a good area where dogs can be off leash there is no nesting birds in this area and no reason what so ever to change it. Most of the beach is on leash + I think the balance works well.

Rules for the sake of it are powerless when there is no reason to implement them.

Correspondence ID: 4284 **Project:** 11759 **Document:** 38106
Received: Apr,13,2011 00:00:00
Correspondence Type: Park Form
Correspondence: GGNRA must consider the negative impact restricting dogs would have on San Francisco city parks, dog owners, dog behavior + on the dogs themselves.

It is irresponsible + against the agreed conditions that formed this urban recreation area to dis-allow dogs + their humans from using the GGNRA to get true off-leash exercise.

The alternative I choose is NO change to existing usage, tho with increased implementation of existing rules - pick up after + control dogs by voice command.

Correspondence ID: 4285 **Project:** 11759 **Document:** 38106
Received: Mar,30,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Dogs need huge amount of exercise, especially bigger dogs. With little or no parks that are only for dogs in San Francisco, restricting dogs to be on leash

in parks like Fort Funston or Presidio will lead dog owners nowhere to bring their dogs to exercise freely, which defeats the purpose of having such a park. Dog owners do not need to drive all the way to these parks to walk their dogs on leash, when we can do the same around our neighborhood. Without adequate amount of exercise, dogs become depressed, overweight, and unhealthy. This also will raise another problem among neighbors that dogs are peeing everywhere in the neighborhood. Neighbors will even blame all dog feces in the neighborhood to dog owners because some irresponsible dog owners fail to clean after their dogs. Some neighbors would even cuss dog owners out for just walking their dogs around the neighborhood. There are already many places that do not welcome dogs and with the new restrictions of these few parks that allow dogs to run freely will bring many inconveniences to dog owners and their neighbors. Finally, please consider that even if this new proposal is enforced, it does not mean everyone will follow it faithfully. Then, it is necessary to hire someone to actually enforce it. This is wasting time and taxpayer's money to enforce something that is nearly as important. The money that has been wasted on this pathetic proposal could have been useful to hire someone to clean the park or even to protect the "native species" that are nowhere to be found.

Correspondence ID: 4286 **Project:** 11759 **Document:** 38106

Received: Apr,18,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

Please urge dog owners/walkers to keep their animals ON leash while walking on the pedestrian path. Too many of them let the dogs run free causing a hazard to walkers.

Sincerely,

A.B. Roache

Correspondence ID: 4287 **Project:** 11759 **Document:** 38106

Received: Apr,14,2011 00:00:00

Correspondence Type: Letter

Correspondence: Frank Dean, Dogs are a great comfort to people of all ages. My husband (97 yrs) + I (87 yrs) believe that dogs prefer to be people rather other (dogs) of their own kind. Certainly dog off leash should be under voice control at all times but they should also enjoy the exercise + freedom that ensures their health. We are fortunate to live in the East Bay where we walk our 2 dogs off leash daily at Pt. Isabel. The many dogs to play there choose extremely

pleasant owners who become friendly acquaintances. Well controlled off-leash dog places are a win, win, win situation.

Sincerely,

Lucille Cain Bill Cain

Correspondence ID: 4288 **Project:** 11759 **Document:** 38106
Received: Apr,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: Taxes up, Food prices up, auto gas up, electricity up, parking up = \$ we don't have. Leave us some pleasure allowing our beloved animals to use the parks we pay for.

FREEDOM

Correspondence ID: 4289 **Project:** 11759 **Document:** 38106
Received: Apr,15,2011 00:00:00
Correspondence Type: Letter
Correspondence: GGNRA,

I already sent you my feelings about dogs, myself and Ft. Funston, but I forgot one very important point. People with-out dogs are quite curious about all the dogs at this location. They are not afraid and smile that a place like this exists. (Yesterday it happen again) I was walking into the parking lot when a parked car with 4 people inside asked me about this place. People also have mentioned to me they would have brought their dog if they would have known about Ft. Funston. My pets (many generations) and I have seen this place get crowded on weekends and I have seen nature take down your fences. Nature is also doing a job by eliminating the ice plants and creating wild strawberries for the wild birds and animals to eat.

Please allow this wonderful place to be dog heaven. Animals adapt, they did when the ugly bunkers were created.

B. Asaro

Correspondence ID: 4290 **Project:** 11759 **Document:** 38106
Received: Apr,15,2011 00:00:00
Correspondence Type: Letter

Correspondence: To: Mr Frank Dean

I am totally opposed to dogs being excluded from GGNRA lands. Dogs are like family and leaving them home is a mutual loss of a good experience. I have walked my dogs in Oakwood Valley for 20 yrs. The dogs have a safe vehicle free trail. Bikers do a lot more damage to trails than dogs. If this passes I will be in touch with elected officials. I don't know if you're involved with the nice trees cut down between Golden Gate bridge and tunnel. The nicest group of pines were cut down for no apparent reason.

Yours, Brendan Burke

Correspondence ID: 4291 **Project:** 11759 **Document:** 38106

Received: Apr,15,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

My wife and I are 72 years old. We love going to Cronkite Beach but too many dogs jumping on my wife - completely out of control. Dog people say their dogs just want to play - we hate it. I used to fish there until every time dogs pissed on my lunch box and fishing gear. By the time I find a ranger the dog and owner are gone. Dogs chase the birds, also. If mothers of small children know of all the dog feces in the sand they would put a stop to it.

Born in San Anselmo I feel I have lost something special - the right to walk a beach. Even Stinson Beach has dogs out of control- more dog feces there than Cronkite. The dogs go from the Federal Park to the County park area where there are no rules enforced. I have never ever seen a ranger issue a citation. We are about to give up.

I don't think this letter will be read or do any good. There are more dog lovers than people that want solitude and safety at our beaches. This is a disgrace. Mr. Dean - Thank you for accepting my letter and I do hope you read it.

Respectfully - Mel Colombo

Correspondence ID: 4292 **Project:** 11759 **Document:** 38106

Received: Apr,18,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Frank:

In the late 60's when I was a college student at the University of San Francisco I worked to establish the GGNRA. The vision to create an expansive wild space near such a dense urban environment that would provide a "lung" for urbanites and their families was realized in 1972. The GGNRA has for decades provided open space for all to enjoy. And the "all" includes dogs because they are a part of families.

The small percentage of open space that allows dogs should be left unchanged because it provides for those of us who may not be able to otherwise use the area.

One of our sons and his family live in San Francisco. As families we frequent Crissy Field with our dogs. Those who are critics need only to observe the joy and happiness that prevails there. There have been several times when I have encountered dog-less families who go there to play with dogs or others there to scout out a particular breed. It has always been a civil and neighborly experience. To remove these dog friendly areas as you propose is to deny the purpose for which the GGNRA was established and for which I so diligently volunteered.

Sincerely,

Barbara K. Westover, Architect

Correspondence ID: 4293 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

Please consider keeping the dog regulations the same. It appears to work pretty well. If any changes need to be made, how about keeping it the same, but putting some time of use constraints on say the beach.?

I think this should keep everyone peaceful, and happy. It's a great place we live in, and so many bay area property owners have dogs. Its just a few that aren't well behaved, just like people. And just a few in truth that are loud and wish to limit dog access to our parks.

Respectfully submitted,

Peter Brosig

Correspondence 4294 **Project:** 11759 **Document:** 38106

ID:**Received:** Apr,26,2011 00:00:00**Correspondence** Letter**Type:****Correspondence:** GGNRA To Parkplanning authorities,

I have enjoyed the Bay area Parks and Beaches for forty years. I strongly believe that NO dogs should be allowed at our Parks and Beaches. If dogs are allowed it should be On Leash only and very limited. Voice command control is a joke ,not reality. There are simply to many inconsiderate and or irresponsible / unaware dog owners who view the beaches and parks as just another Dog park with no respect for nature ,wildlife or other people. They seem to think that the shorebirds and wildlife are there for their dogs amusement to chase ,bark at nonstop and harass with little regard to the detrimental effect on the park and other peoples experience.

I would estimate that 95% of the shorebrids have disappeared in the last 20 years at the dog friendly beaches. One year ago I began to make an effort to mainly go to parks or beach areas where dogs are not allowed.

Over the course of my life I have raised Three wonderful dogs that brought much joy. Dogs are a problem because of the entitled inconsiderate dog owners and the Only Way to control them is to NOT allow them to bring their dogs to our Beaches and Parks.

Thankyou, Jay Patsor Novato Ca. 4/17/11

Correspondence 4295 **Project:** 11759 **Document:** 38106**ID:****Received:** Apr,27,2011 00:00:00**Correspondence** Letter**Type:****Correspondence:** RE: Dog Management Plan I wish to comment on the portion of the proposed dog management plan that pertains to Crissy Field because that is where I most frequently take my two small children. I also take them to Golden Gate Park. We are residents of San Francisco, in the north part of town, and we love these parks. I am very opposed to the recommendations that allow dogs off- leash on the Crissy Field beach and on-leash on the walking path. My children have gotten frightened by dogs and one of them was traumatized by a vicious dog fight nearby. My kids wander around and like to pick up pebbles and sand. There is sometimes dog poop that is not cleaned up. It is not a safe environment for small children. I urge you to consider changing the proposed plan. Dogs should not be allowed off leash on the beach. Indeed, I think that dogs should not be allowed on the beach at all unless it is a designated, fenced area. And dogs should not be allowed on the path. It is too crowded, full of adults, kids, bikes. Children are

vulnerable and must be protected. Thank you.

Correspondence ID: 4296 **Project:** 11759 **Document:** 38106
Received: Apr,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: April 25, 2011 To: Frank Dean, Superintendent, GGNRA RE: Dog Management Proposed Plan Dear Mr. Dean, I am commenting on the dog management plan. I am an older woman who lives near Crissy Field and that is the only park I can get to easily. So, my comments are going to be limited to that portion of the report. I am distressed at how much has been given over to the dogs. It has been years since I've been able to walk on the beach because of the aggressive dogs loose there. I was once knocked down and I am afraid to walk there. This is the only beach close to the heart of the city. It makes no sense to allow dogs free reign there when there are other places they can run that would not interfere with large populations of people. The plans' recommendation to allow continued off leash use on the beach is a clear statement of the priority of dogs and dog owners/walkers over ordinary people. Secondly, I am against the allowance of dogs on leash on the path that runs from the near parking lot to the fishing pier. Very large numbers of people use this path. The dogs, even on leash, jump, bark and poop. There are accidents with bikers. Furthermore, if dogs are allowed off leash on the grassy airfield, who will patrol their getting onto the path on-leash? The dogs will continue to run, as they do now, between the field and the path, back and forth. In all the years I've been walking on that path, I've never seen any enforcement, not once. I am distressed that the one park nearest to the largest concentration of people will be given over to the dogs. Let the dogs run free in a more remote area. There are plenty of people like me who are older, small children, frail or at least not very strong. We deserve to have a place we can get to and feel safe. Why are you choosing dogs over the safety and well-being of people? I hope that you will reconsider the recommendations in the proposed plan. Thank you. Sincerely, Mary Foust, San Francisco

Correspondence ID: 4297 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: DEIS for Dogs in GGNRA

Ntl Park + Rec lands belong to ALL people.

At Crissy Field: No off-leash dogs along the narrow strip of beach

between the dunes and the water.

Not compatible with other people or shore birds.

Rockwell Townsend

Correspondence ID: 4298 **Project:** 11759 **Document:** 38106

Received: Apr,21,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

I write this letter to you asking you to reconsider the proposal to further limit dogs in our local GGNRA parks. I was walking my two well behaved dogs on the beach early one morning last week, and I noticed I was not the only dog person there who was collecting a bag of trash in addition to our dogs poop.

Dog owners in general tend to be well connected to the environment, and pick up their poop, and other trash as well. I wish beach goers would be so kind after enjoying some of the wonderful weather we had had recently.

CONSIDER timed ususage? Keep the open areas the same, but limit the hours on the beach to early, and late. It'll keep a lot of people happy, and keep the beach much cleaner. Too.

Respectfully submitted,

Jane Hook

Correspondence ID: 4299 **Project:** 11759 **Document:** 38106

Received: Apr,20,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

Dogs must be managed to protect the seagulls and plovers that live in their natural habitat along hte beaches of the park.

Yours very truly,

Edward Dierouf

Correspondence ID: 4300 **Project:** 11759 **Document:** 38106

Received: Apr,29,2011 00:00:00
Correspondence Type: Letter
Correspondence: 1) Dog Tags required - renew ev. 2 years
2) Public areas + trails - "leach required"
3) "Specific areas" - removed from public trail - for off leach dogs - fenced if possible

Thank you- Monique Carment

Correspondence ID: 4301 **Project:** 11759 **Document:** 38106

Received: Apr,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

Please preserve the decades-old tradition of off- leash dog walking in Montara's Rancho Corral property. I have lived in Montara since 1978 and have walked my vizolas there since then.

Most of the humans I meet on the trails have canine companions and most of the dogs are leash-free. In all those years, there have been only a couple of occasions when I might have wished a dog was on a leash.

In addition, I think you should reconsider the location of the parking lot. A parking lot adjacent to an elementary school seems like an invitation to pedophiles to come and lurk. I write as a retired elementary school teacher with thirty-eight years experience.

We are a small community and rely on you to make judicious decisions.

Thank you,

Diane Miles

Correspondence ID: 4302 **Project:** 11759 **Document:** 38106

Received: Apr,25,2011 00:00:00
Correspondence Type: Park Form

Correspondence: Our family dog, Callie frequents Fort Funston. Fort Funston is her playground where she play chases with other dogs and tennis balls. Many of the off-leash areas have been available for dogs and their owner's recreation

for so many years, we fail to understand why the need for changes (especially the severe restriction proposed by the NPS). We can understand the need to set dog management rules to the new recreational areas for public safety and wildlife protection. However the concerned areas have been off leash for many years.

If GGNRA is able to provide new recreational areas for dog off-leash recreation, it would be a great compromise to the proposed restriction. The present proposed small areas will cause conflicts for both people and dogs if they restricted to a small area. Though causing severe erosion/damage to the small limited areas from over use.

On the weekends, there are probably thousands of people and their dogs enjoying the off leash area there at Fort Funston. Many tourists frequent Fort Funston also because of the popularity of the dog off-leash area. A sign at the entrance informing of entering off-leash areas would be a great help to tourist to the area. With the proposed restricted area, many dog owners will probably be using public city parks. Frequent use of city parks will cause conflicts with non-dog lover users and more impacts on city parks. Any frequently used area - no matter GGNRA recreational area or city parks will require maintenance. If these concerned GGNRA areas are maintained, the next generation of Fort Funston users will be able to enjoy the area as much as we presently are.

A few years ago, many of the ice plants were removed by GGNRA because they are not native plants. Without the ice plants to help keep the sand dunes in place, the coastal strong wind has caused further erosion/damage to the area.

As we mentioned earlier, the Fort Funston Recreational Area needs to be maintained since it is such a popular recreational area for many and their dogs, and many of the tourists that frequent the area. We do believe that all wildlife deserves a safe area; however we fail to understand why another area cannot be used from snowy plover protection. There is the whole California coastline that can be preserved for the protection of the snowy plover; whereas there is only one Fort Funston that the dogs can consider as their big playground

Correspondence ID: 4303 **Project:** 11759 **Document:** 38106
Received: Apr,20,2011 00:00:00
Correspondence Type: Park Form
Correspondence: I think the GGNRA should not change where humans are permitted to walk with thier dogs. Currently only 1% of the parks are available to us humans who include dogs in our family outings. They are very well behaved + go

everywhere with me! I would not be going hiking without them + it is good for me too.

San Francisco + the bay area has always been dog friendly. The GGNRA lands are mandated to provide recreational opportunities for this urban area. This is not a remote or pristine area - it is a highly populated active urban area + our needs for recreation for people + thier families - including dogs - is a planning priority.

Rules regarding usage of any facility need to be inforced, not have the areas fenced off with no rules. Dogs are not he problem- lack of rule following is the problem. Dogs are not the worst offender on terms of environmental destruction - humans are.

Dogs actually need room to run to stay mentally + physically healthy, as do humans. Thank you! In restricted area there is more environmental damage.

Correspondence ID: 4304 **Project:** 11759 **Document:** 38106

Received: Apr,21,2011 00:00:00

Correspondence Type: Letter

Correspondence: To Whom it May Concern: I have read parts of your huge EIS and tried to understand the Executive Summary, which baffles me. I wonder if you are trying to obfuscate the real reasons for your extreme position regarding dogs.

I live in Muir Beach and this has been a dog-friendly beach for many (40+) years. I have lived here for 16 years and can see the beach from my window. Most of the time I see dogs frolicking at the waters edge and swimming. They are having more fun than the people and they are far less destructive also. If a dog wanders into the "new lands" area, it is the responsibility of their guardian to call them back...if that doesn't happen it is the person who is at fault since dog's can't read signs. On a nice weekend most of the playing in the creek mouth is by children who often build dams (mostly boys) across the endangered salmon habitat. After a big weekend there is also alot of trash that I pick up as do others in my community. I never saw a dog leave trash behind, unless you are talking about their feces and again, a responsible pet owner picks that up. There is definitely far more destructive behavior perpetrated on this area by humans than by dogs. Also I notice that there are no signs to tell people to stay out of the lagoon area. If this is the reason to ban dogs, then I think its only fair to tell people what the rules are because they won't just pick it up telepathically.

Muir Beach is a wonderful place to live - surrounded by open space and vast hiking trails....unfortunately we have only one trail (the coastal trail) where

we can hike with our dogs and you want to take that away from us too. If I understand your position, the only place dogs would be allowed is on Pacific Way and the beach parking lot. Really, that is absurd. Muir Beach is a small beach that is dog-friendly. People who do not like dogs can go to one of the many beaches in the area that are already dog-free. Why would you want to take away the one beach left for people to recreate with their dogs. I thought Golden Gate Recreation Area was for recreating - and that means playing at the beach with your children and/or your pet. Children are far more noisy and destructive yet you wouldn't think of banning them....so why are you picking on dogs? Especially here in probably the most dog-friendly area of the country. From what I read in your EIS you are suggesting that people and their dogs go to Little Beach! This is ludicrous. The road to and from there (sunset way) is not equipped to handle any more traffic. It is basically a fire road and needs to remain that way. There is no parking and what little there is on the roadside is usually residential parking. There are no facilities at Little Beach and during the winter months the beach is pretty much unusable as the sand washes out and it becomes just another hit of rocky coastline.

I read that 99% of GGNRA land is already dog-free - that means 1% is available for people and their dogs. If this is in response to people not liking dogs I find it difficult to believe that the NPS could not let us keep the measly 1% that we have to enjoy our pets. I actually feel that this whole issue should be turned around and dogs should have more off-leash areas when there is such a minute portion of federal lands where they are welcome. What's with the bad attitude toward dogs? I hope that the NPS and the GGNRA can see the error of this plan and continue the status quo here at Muir Beach or, better yet, open more of the trails to people and their faithful companions.

Sincerely,

Lonna Richmond

Correspondence ID: 4305 **Project:** 11759 **Document:** 38106
Received: Apr,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: RE: Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean:

I am writing as a concerned citizen and avid birder and wildlife advocate regarding the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area. I use and

enjoy the GGNRA lands and am concerned about impacts from dog-related recreation on the wildlife, habitats and other park users at the park.

I strongly encourage you to improve the plan by implementing the following steps:

1. Where possible there should be designated off-leash areas for dog walkers. If possible these areas should be fenced off in order to provide more protection for all park users and create clearer boundaries so that dog owners are aware of how to comply with park rules. It is clear that SIGNS are NOT enough.
2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should initiate measures to improve compliance.
3. Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it.
4. I think that the majority of trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs.
5. While dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.

Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measures to protect the National Park's valuable resources for everyone and for future generations.

Thank you, Norma Tannenbaum

Correspondence ID: 4306 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Dog Management in GGNRA

Dear Mr. Dean,

Please count our family as one that has waited for some serious re-evaluation of the dog situation in the parks.

Our experience has been that too many dog owners abuse / ignore existing rules which result in our family not frequenting the parks like we use to.

We are tired of:

1) Dogs off-lease rushing up to our children, as their owners often shout "Don't worry, he (or she) is friendly". Friendly or not, a big dog charging at a small child is unsettling and unwelcomed.

2) Dog waste. While many dog-owners might pick up afterwards, the fact is many don't and can't as their dogs are out-of-sight when off-lease. "Facts on the ground" betray them. The sheer number of animals is part of the problem.

3) Dog owners sense of entitlement. While this is a subjective thing, when I've attempted to ask dog owners to abide by the law, I've been met with disgruntled looks and words.

4) Interference with appreciating environment. Barking dogs is not that different then a blasting radio ' they are not the sounds we came to the parks to hear.

Somehow conveying to dog owners that they are impacting non dog-owners experience is crucial, much like the debate between hikers and cyclists on shared roads.

Good luck! Haydn Reiss San Anselmo / email:

Correspondence ID: 4307 **Project:** 11759 **Document:** 38106
Received: Apr,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: General Superintendent,

Regarding the dog management issue I support Alternative D for all of the sites in the GGNRA.I frequent all of the sites and live near the Homestead Valley and Oakwood Valley areas. I feel strongly that on-leash dogs be allowed only on the fire roads in these areas.

I have witnessed damage to plants and land by dogs. Our natural resources need protection.

Thank you,

Elaine Drude Robert Drude

Correspondence ID: 4308 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

My take on Ft. Mason changes - let's keep dogs on leashes - have had several near bites this year.

Secondly, some days the flood of rental bikes is overwhelming - don't know how to control that but many seem unaware of pedestrians.

Perhaps pulling up the blacktop + returning the paths back to dirt trails would help. Also better on the knees. Thank you.

Larry Brown

Correspondence ID: 4309 **Project:** 11759 **Document:** 38106
Received: Apr,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Subject: Public Comments on the GGNRA Draft Dog Management Plan/EIS

Dear Mr. Dean:

I hereby submit the following concerns and comments on the GGNRA Draft Dog Management Plan/EIS regarding the proposed Preferred Alternative for the Sweeney Ridge Trail System located in San Mateo County:

1) I am a Pacifica resident who has been using the Sweeney Ridge Trail System for over 3 years. I typically hike and run the trails 4 days a week with my dog on-leash (6 feet in length) between the Mori Ridge trailhead and Portola Discovery Site or SFPUC Portola Gate. I have also used the trail system for regular hiking with my family without dogs as well as mountain biking. I am fully in support of continued multi use of the Sweeney Ridge Trail System for all uses including dog walking (leash only), hiking, trail running, mountain biking, horseback riding, wildlife watching, etc. I am opposed to GGNRA Draft Dog Management Plan's Preferred Alternative, which would ban on-leash dog walking on the Sweeney Ridge Trail System.

My preference would be for Plan adoption of Alternative A (Map 19-A), which would allow continued multi use (including on-leash dog walking) throughout the Sweeney Ridge Trail System with the exception of the Notch Trail, which would allow hiking only. I would also support Plan adoption of Alternative A with Modification by also limiting use of the Meadow Loop Trail to hiking only. By providing two trails for hiking only, this would help reduce potential user conflicts while protecting the most sensitive habitats within the Sweeney Ridge Trail System. The Notch Trail is a narrow single track trail located within an identified sensitive Mission blue butterfly corridor. The Meadow Loop Trail is also a narrow single track trail located next to a sensitive fresh water wetland that likely supports California red-legged frog and potentially San Francisco garter snake. The rest of the trails within the Sweeney Ridge Trail System are wide enough (8-12+ feet) to allow continued multi use while avoiding user conflicts. Further, these trails are heavily degraded from a habitat standpoint since they are old ranch roads or paved roads that were used to access the old Nike Missile Site. Can you explain why Alternative A or Alternative A with Modification as described above would not be suitable to avoid use conflicts and protect sensitive habitat from trail user degradation? Please explain. Please address the following observations that I've made based on my long term use of the Sweeney Ridge Trail System:

- a) The trail system is made up of mostly wide dirt ranch roads and paved roads (8-12+ feet wide) that can easily accommodate multi use and allow for safe passing by users. These roads are wide enough to allow park ranger and CDF fire truck use. Please explain the reasons why this was not considered when deciding to ban dogs on-leash from the Sweeney Ridge Trail System.
- b) Much of the trail system and surrounding area is degraded with abandoned and graffitied buildings, paved roads and ranch roads. These disturbed areas are not pristine in terms of sensitive habitat with the exception of the butterfly corridor at the Notch Trail and the freshwater wetland next to the Meadow Loop Trail. Please explain how banning dogs on-leash from the Sweeney Ridge Trail System would help reverse this existing degradation. There was no mention in the Dog Management Plan that the abandoned buildings would be removed and those areas restored with native vegetation. Wouldn't this be more effective in improving the trail user experience? Please explain.
- c) The existing ranch and paved trails are surrounded by thick coastal scrub/chaparral vegetation (4-6 feet high in most places) with poison oak. It is highly unlikely that trail users with dogs on-leash would desire to go off trail or let their dogs off-leash so that the dogs could go off trail. Please explain why this was not considered in the Dog Management Plan.
- d) Most of the small offroad trails appear to be caused by wildlife (deer,

coyote, etc.). Please explain why this was not considered in the Dog Management Plan.

The Sweeney Ridge Trail System's topography is steep and rugged and is not suitable for beginner trail users, small children, or people with physical disabilities. This limits the number and diversity of users on the trail system and overall user conflicts. Please explain why this was not considered in the Dog Management Plan.

In my experience, I have never had a conflict with another user while walking my dog on-leash and typically see between 0-20 people during my hikes on average. Considering this low number of user traffic, how can there be a case for significant user conflict to justify banning dogs on-leash from the Sweeney Ridge Trail System? Please explain.

g) I have never observed professional dog walkers with multiple dogs (3 or more dogs) on the Sweeney Ridge Trail System. Please explain if this was a consideration in proposing to ban dogs on-leash from the Sweeney Ridge Trail System.

h) The Sweeney Ridge Trail System is a multi-use trail system typically used by hikers, hikers with dogs on-leash, horseback riders, and mountain bikers. How can the EIS analyze the environmental impacts from hikers with dogs on-leash in isolation from the rest of the users? Please explain.

i) The Dog Management Plan and EIS make the assumption that most hikers with dogs don't have dogs on-leash while on the Sweeney Ridge Trail System. However, in my observations, most hikers with dogs have their dogs on a 6 foot leash as required by GGNRA regulations. Please provide additional factual support for these assumptions.

j) During my 3 years of use of the Sweeney Ridge Trail System and being on the trails approximately 4 days a week, I have observed park rangers only a handful of times. I think that additional ranger presence would help provide incentive for all users to follow the GGNRA regulations, including having dogs on a 6 foot leash. Please explain why this wasn't considered in the Dog Management Plan.

k) There is limited signage at most of the trail heads. For example, there is not much signage at the Mori Ridge Trail entrance and the Portola Discovery Site area (intersection of Sweeney Ridge Trail, Baquiano Trail, and Sneath Lane Trail). There should be additional signage that explains the important rules and regulations applicable to all users similar to the signage installed at the Notch Trail entrance within Skyline College and the Milagra Ridge Trail System entrance. This would significantly help in reducing potential user conflicts by educating trail users and reinforcing the

regulations. Please explain why this wasn't considered in the Dog Management Plan for reducing user conflicts.

l) In order to protect the surrounding habitat and make sure trail users stay on the designated trails, there should be additional signage installed at the trail heads explaining 1, v/illustrations the local habitat and wildlife. This signage should be similar to the signage installed at the Notch Trail entrance within Skyline College and the Milagra Ridge Trail System entrance. This would also help educate and reinforce GGNRA regulations. Please explain why this wasn't considered in the Dog Management Plan Inv reducing potential user conflicts within the Sweeney Ridge Trail System. m) Banning hikers with dogs on-leash would remove a significant user group from the Sweeney Ridge Trail System. Most of the hikers with dogs are local community residents and hike the trail often. Considering that the trails are steep and rugged and fairly remote, hikers with dogs serve as important eyes and ears on the trail system, especially since there is limited ranger presence. Please explain why this was not considered in the Dog Management Plan.

n) The Sweeney Ridge Trail System is one of the few trail systems left in the Bay Area to allow hiking with dogs on-leash. The trail system offers long and steep hikes that are great exercise for both the dog and dog owner. The Dog Management Plan does not provide an "apples to apples" analysis when describing alternative nearby locations to the Sweeney Ridge Trail System for hiking with dogs on-leash. Please explain this discrepancy.

3) Please address the following specific comments regarding sections of the Dog Management Plan/EIS:

a) Page 108, Chapter 2, the National Park Service Preferred Alternative section, Sweeney Ridge / Cattle Hill subsection--

i) Please elaborate on how not allowing dog walking within the Sweeney Ridge area would protect Mission blue butterfly habitat? Dogs are required to be on a 6 foot leash per the regulations and most dog walkers using these trails have their dogs on a leash. Also, there are other users on the trail system, including hikers without dogs, mountain bikers and horseback riders. How is it that dog walking can cause impacts to Mission blue butterfly habitat but hiking without dogs, mountain biking and horseback riding doesn't? Please explain.

ii) Considering that the Sweeney Ridge Trail System is made up of wide dirt ranch roads and paved roads and includes numerous abandoned structures and debris, how is it that this portion can be considered undisturbed contiguous habitat that is rare and contains wildlife that could be disturbed by the presence of dogs? Other areas outside of the designated trail system

are inaccessible to hiker and dog alike due to the rugged topography and dense chaparral and poison oak vegetation. These are the areas that should be considered undisturbed contiguous habitat and by its very nature is already protected from degradation by humans and dogs. Please explain.

iii) The Sweeney Ridge / Cattle Hill subsection states that "this site is contiguous with the San Francisco watershed, which also does not allow dogs." This statement is misleading and incorrect. In fact, the Sweeney Ridge / Cattle Hill Trail System is contiguous to the San Francisco Public Utilities Commission Watershed Lands, which is predominantly off limits to the public, not just dogs, since these are pristine lands that provide the Bay Area with 15% of its drinking water source. Please explain why this incorrect comparative statement was made to support the Preferred Alternative?

iv) This subsection states that "Alternative C would be clear to the public and would be easily enforceable by park law enforcement staff." This statement is incorrect since it's not clear how the GGNRA will notify the public that dog walking is not allowed within the Sweeney Ridge area. Not to mention, other nearby San Mateo County and San Francisco County GGNRA sites are proposing their own site-specific areas where dog walking will be allowed, including such nearby sites as Mori Point and Milagra Ridge. Please consider that the public can access the Sweeney Ridge Trail System from multiple access points, and that there currently is limited signage to help educate the public to the GGNRA rules and regulations at the major trail heads within the Sweeney Ridge Trail System. This all seems like it will be a nightmare to effectively make clear to the public where dog walking is allowed/not allowed and to enforce. Wouldn't it be more effective to educate the public with appropriate signage and ranger presence while still allowing dog walking within the designated trails as is currently allowed? Please explain.

v) This subsection states that "Alternative C would allow multiple user groups to experience the trail and provide balance." This statement is incorrect. By not allowing hikers to walk with their dogs on-leash on most of the trail system, you are not allowing a significantly large user group from experiencing the trail. Please consider that many of the users of the Sweeney Ridge Trail System live locally and access the trail system from 3 very different geographical trail access points. These include the Mori Ridge Trailhead at Shelldance Nursery in North Pacifica, the Sneath Lane Trailhead in San Bruno, and the Baquiano Trail in South Pacifica. Please explain how this will allow multiple user groups to experience the trail system and provide balance?

b) P. 203-207, Chapter 2, Sweeney Ridge and Cattle Hill section of Table 5'

i) There is a consistent argument made in this portion of Table 5 that Alternative C, the Preferred Alternative, which would not allow dog walking within the Sweeney Ridge Trail System, would have a negligible impact on most of the environmental resources because of the physical restraint of dogs via leash and dog walking only occurring on previously disturbed/designated trails. Why isn't this same argument made for Alternative A, the No Action Alternative? Under the No Action Alternative, dog walking with a leash would continue to be allowed throughout most of the Sweeney Ridge Trail System. The current GGNRA regulations require that dogs must be on a leash (6 feet in length) at all times and dog walking shall only occur on the previously disturbed/designated trails within the Sweeney Ridge Trail System. Per the GGNRA regulations for the Sweeney Ridge Trail System, off-leash dogs are prohibited. Therefore, wouldn't Alternative A have similar negligible impacts on most of the environmental resources because of the mandatory physical restraint of dogs via leash and dog walking only occurring on previously disturbed/designated trails? Please explain.

P. 273, Chapter 3, Table 9 '

i) For the Sweeney Ridge / Cattle Hill site, the percentage of visitors walking dogs is described as Low to Moderate. However, it has been my experience (using the trail system approximately 4 days a week for at least 3 years) that the percentage of visitors walking dogs out of the total visitors (hikers, dog walkers, horseback riders, mountain bikers, etc.) is Moderate (10-30 percent) to High (> 30 percent). This means that visitors walking dogs represent a significantly large proportion of total visitors using the Sweeney Ridge Trail System. Please elaborate on how this visitor data was collected and why there seems to be a discrepancy in the proportion of visitors walking dogs?

d) P. 278, Chapter 3, Sweeney Ridge / Cattle Hill subsection '

i) This subsection states that "Sweeney Ridge has low visitor use, consisting mostly of bikers and hikers, and low to moderate use by dog walkers (table 9)." Based on my experience using the Sweeney Ridge Trail System, I agree that Sweeney Ridge has low visitor use compared to other GGNRA sites. I disagree that visitor use is mostly bikers and hikers. In my experience, visitor use is mostly hikers and dog walkers. Please explain how this information was assessed and why it was assumed that bikers make up a large proportion of users on Sweeney Ridge? I also disagree that the proportion of dog walkers is low to moderate. Based on my experience, the proportion of dog walkers is moderate to high. Please explain this discrepancy.

ii) This subsection states that "the closest off-leash dog walking areas

outside park property are Esplanade Beach in Pacifica and the San Bruno Dog Park." First, why are off-leash dog walking areas provided as examples when the Sweeney Ridge Trail System only allows on-leash dog walking? Other nearby examples should include on-leash dog walking areas. Second, even though the City of Pacifica allows dog walking on Esplanade Beach, for several years, Esplanade Beach has been completely inaccessible to the public, especially for dog walking, due to significant coastal erosion and storm destruction of coastal access points to this beach. Please explain these discrepancies.

P. 279-282, Chapter 3, Visitor Experience '

i) This section provides a description and analysis of the visitor experience to the GGNRA sites relative to off-leash dogs. Please explain why this section does not also provide a description and analysis of the visitor experience relative to on-leash dogs? This would be especially applicable to the Sweeney Ridge Trail System (which currently allows dog walking on-leash only) since none of the Alternatives proposed for the Sweeney Ridge Trail System would allow off-leash dog walking. Please explain.

P. C-10, Paragraph 2, Appendix C, Potential Impacts to Vegetation from Dog Walking '

i) This paragraph discusses that to minimize impacts to coastal scrub, chaparral, and grassland plant communities that are found at the GGNRA sites (including Sweeney Ridge / Cattle Hill), on-leash dog walking would be required at all sites except Oakwood Valley. It further discusses that by restricting dog walking to a 6-foot leash, the impacts would be limited to a 6-foot corridor immediately adjacent to the trails. This paragraph concludes by stating that "overall, impacts would be limited to the trail and the 6-foot corridor, which is a relatively small impacted area when compared to the size of each site." Based on my observations using the Sweeney Ridge trails, the trails are located predominantly within coastal scrub, chaparral, and grassland habitat. These trails consist of dirt ranch roads or paved roads that are approximately 8-12+ feet in width. Using the same logic and analysis described in Paragraph 2, one should conclude that since the Sweeney Ridge Trail System already requires dogs to be on-leash (6 feet in length), and since trails are 8-12+ feet in width, the impacts to the predominant habitat surrounding these trails would be negligible. Therefore, why does the Dog Management Plan's Preferred Alternative propose to not allow dog walking on-leash within the Sweeney Ridge Trail System? As described throughout the Dog Management Plan, physically restraining dogs on-leash would protect habitat and wildlife off trail and would eliminate chasing after wildlife. Please explain. P. 293, Paragraph 4, Chapter 4, Potential Soil Impacts Common to all Alternatives '

This paragraph states that "on-leash dog walking is based on an allowed 6-foot dog leash. In general, and assuming compliance, impacts as a result of the action alternatives (B'E) would be limited to the existing trails/roads and the 6-foot corridors of land adjacent to both sides of the trail ("limit of disturbance," or LOD; LOD = width of trail plus 12 feet). Restricting dogs to trails would concentrate impacts on the already compacted soils of trails/roads, whereas dog walking off-leash may cause more dispersed impacts over a wider area." Based on my observations using the Sweeney Ridge trails, the trails consist of already compacted dirt ranch roads or paved roads that are approximately 8-12+ feet in width. Using the same logic and analysis described in Paragraph 4, one should conclude that since the Sweeney Ridge Trail System already requires dogs to be on-leash (6 feet in length), and since trails are 8-12 feet in width, the impacts to soils and erosion would be negligible. Therefore, why does the Dog Management Plan's Preferred Alternative propose to not allow dog walking on-leash within the Sweeney Ridge Trail System? Please explain.

h) P. 438-439, Chapter 4, Sweeney Ridge / Cattle Hill Alternative A: No Action '

i) It is stated that "this site has documented high visitor use by dog walkers and 55 leash law violations were recorded in 2007/2008 (table 9): therefore, off-leash dog walking is currently occurring along the trails of Sweeney Ridge.- I agree that there is high visitor use by dog walkers. Please make this correction in table 9 since it currently says low to moderate. I disagree with the assumption that because there were leash law violations over a two year period, that most dog walkers using the Sweeney Ridge Trail System have their dogs off-leash. Based on my experience of using the Sweeney Ridge Trail System (approximately 4 days a week for the past 3 years), I have observed that most dog walkers have their dogs on-leash. Rather than proposing to ban on-leash dog walking within the Sweeney Ridge area, wouldn't it be more effective to increase ranger presence (especially during busier times such as on weekends) and educate users of the GGNRA's on-leash rules in order to deter this behavior? Wouldn't it be more effective to provide better signage at the trail heads to explain the rules and regulations and why it's important to keep dogs on-leash and on trails in order to deter this behavior? Please explain.

ii) What is the total number of dog walkers that visited the Sweeney Ridge Trail System during 2007/2008? Without knowing this number, it is impossible to know what percentage of total dog walkers were not obeying leash laws. This makes the 55 leash law violations meaningless without a total number of dog walkers to base it on. Please explain this discrepancy.

iii) Is there more comprehensive data over a longer time frame (10 years) that can be evaluated to determine dog walking trends within the Sweeney

Ridge Trail System?

Making off-leash dog walking assumptions based on two years worth of incomplete data does not follow appropriate methodology. Please explain.

i) P. 440, Chapter 4, Sweeney Ridge / Cattle Hill Alternative C: Emphasis on Multiple Use, Balanced by County

i) It is stated that "under Alternative C, no dog walking would be allowed at Sweeney Ridge. Therefore, no impacts on soils from dogs would occur at this site, because dog use would be eliminated. Soil disturbance and compaction would no longer occur." I disagree with the statement that soil disturbance and compaction would no longer occur. Other users that would be allowed within Sweeney Ridge include hikers, mountain bikers, and horseback riders. These uses would surely cause further soil disturbance and compaction. Please explain this discrepancy.

j) P. 440, Chapter 4, Sweeney Ridge / Cattle Hill Alternative C: Emphasis on Multiple Use, Balanced by County '

i) It is stated that "on-leash dog walking is based on an allowed 6-foot dog leash. Since dog walkers may walk along the edges of the trails, dogs would then have access to the adjacent land 6 feet in both directions, resulting in an LOD area for soils that would extend 6 feet out from both edges of the trails. In general, impacts on soils would be limited to the existing trails and the 6-foot corridors immediately adjacent to the trails." I disagree with the statement that there would be an LOD area for soils that would extend 6 feet out from both edges of the trails. The Sweeney Ridge Trail System consists of 8-12+ feet wide dirt ranch roads and paved roads surrounded predominantly by extremely dense chaparral and coastal scrub (poison oak) vegetation. In most places the chaparral and coastal scrub vegetation is at least 6 feet in height. This makes the side of these trails inaccessible to both humans and dogs. Please explain how there can be impacts within these 6-foot corridors immediately adjacent to the trails due to this natural vegetative obstacle?

k) P. 677, Chapter 4, Sweeney Ridge / Cattle Hill Alternative A: No Action

i) It is stated that "under Alternative A, dogs would continue to contribute to physical disturbance at both sites through trampling, digging, and dog waste. In addition, since off-leash dog walking currently occurs at the sites, it is likely that dogs would continue to walk or run through other undisturbed areas. Therefore, impacts on coastal scrub/chaparral/grassland vegetation as a result of Alternative A would continue to be long term, minor, and adverse at these sites because effects would be measurable and perceptible, but would be localized in a relatively small area." I disagree

with this assessment. The Sweeney Ridge Trail System consists of 8-12+ feet wide dirt ranch roads and paved roads surrounded predominantly by extremely dense chaparral and coastal scrub (poison oak) vegetation. In most places the chaparral and coastal scrub vegetation is at least 6 feet in height. This makes the side of these trails inaccessible to both humans and dogs. Further, on P. 540 of the Dog Management Plan, a study by Andrusiak (2003, 3.2) is cited that suggests that dogs traveling quietly along a trail with screening vegetation on both sides are unlikely to disturb or even encounter wildlife. This study along with other studies were summarized in this section to provide a basis for discussing impacts on vegetation. Since the dense and tall chaparral and coastal scrub vegetation within the Sweeney Ridge Trail System acts as barrier and screening vegetation, how can it be concluded that dogs would cause continued measurable and perceptible impacts to coastal scrub/chaparral/grassland vegetation if its unlikely for dogs to trample through it or be triggered to trample through it by wildlife? Please explain.

l) P. 681, Chapter 4, Sweeney Ridge / Cattle Hill Alternative

i) It is stated that "physically restraining dogs on-leash would protect vegetation off trail. Therefore, assuming compliance, the overall impacts on coastal scrub/chaparral/grassland vegetation from on-leash dog walking at Sweeney Ridge and Cattle Hill would be negligible because impacts would result in no measurable or perceptible changes in these plant communities." Why wasn't this same assessment made for Alternative A: No Action? Alternative A would continue to allow dog walking on-leash and similarly should assume compliance. Further, why isn't this physical restraint with a leash' argument not applied for all environmental resources under Alternative A with a conclusion that there would be negligible impacts on resources? Please explain.

m) P. 698, Chapter 4, Wetlands and Aquatic Habitats ' i) Within the Sweeney Ridge Trail System, there is a freshwater wetland located adjacent to the Meadow Loop Trail. This section did not include an analysis for Sweeney Ridge and this freshwater wetland. Please address.

n) P. 1158-1159, Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative A '

i) This section states that "Alternative A would continue to result in long-term minor adverse impacts on the Mission blue butterfly at Sweeney Ridge through damage to host plants and habitat in the trail beds and adjacent areas as a result of dogs." Please explain whether there is a high occurrence of lupine host plants and habitat within the trails beds. In my experience, the Sweeney Ridge Trail System is made up of wide dirt and paved roads/trails. The only vegetation observed within the dirt roads are invasive weedy

species. Paved roads do not contain vegetation. Further, these roads/trails are used by park ranger vehicles, horseback riders, mountain bike riders, and hikers without dogs. Wouldn't these other uses also have a damaging effect on host plants and habitat in the trails beds? Please explain.

o) P. 1162, Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative E '

i) This section states "the long-term minor adverse impacts from dogs in the LOD would occur in a relatively small area when compared to the site as a whole; therefore, the overall impact on the Mission blue butterfly from on-leash dog walking at Sweeney Ridge would be negligible, assuming compliance." Why wasn't this assessment also applied to Alternative A? Please explain.

p) P. 1210-1211, 1213, Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative C / Preferred Alternative '

i) This section states "at Cattle Hill, dogs would be allowed on-leash on the Baquiano Trail from Fassler Avenue up to and including the Farallons View Trail. Physically restraining dogs on-leash would not allow dog access to any water bodies that support the frogs or nonbreeding or critical habitat. Therefore, assuming compliance, Alternative C would result in negligible impacts on the frog at Cattle Hill because no measurable or perceptible changes in frogs or critical habitat or nonbreeding habitat would occur." Since Alternative A would also require all dogs to be on-leash, physically restraining dogs on-leash would also not allow dog access to any water bodies that support the frogs or nonbreeding or critical habitat located within the Sweeney Ridge Trail System and would therefore result in negligible impacts. Why wasn't this assessment made for Alternative A? Please explain.

q) P. 1231-1232, 1234 Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative C / Preferred Alternative '

i) This section states that "although dogs would be allowed on the Cattle Hill trails, dogs would be physically restrained on-leash and the leash policy would be enforced. If dogs are physically restrained on-leash at this site, they should not gain access to dispersal habitat and should not affect the snake. Therefore, assuming compliance, alternative C would result in negligible impacts on the snake at Cattle Hill; no measurable or perceptible changes to individual snakes, the population, or designated critical habitat would occur." Since Alternative A would also require all dogs to be on-leash, physically restraining dogs on-leash would also not allow dog access to dispersal habitat located within the Sweeney Ridge Trail System and would therefore result in negligible impacts. Why wasn't this assessment

made for Alternative A? Please explain.

r) P. 1545, 1548 Chapter 4, Part 2, Sweeney Ridge / Cattle Hill Alternative C / Preferred Alternative '

i) This section states that "impacts on visitors who would prefer to walk dogs at the park would be long term, minor, and adverse. Adverse impacts would occur since dog walkers would no longer be allowed in the Sweeney Ridge site. Visitors would no longer be able to enjoy exercising, socializing, and playing with their dogs at Sweeney Ridge Impacts would be minor since this is a low to moderate use site for dog walkers. Some visitors in this user group may find a different area in GGNRA or a local city or county park to walk their dogs. As a result, visitation by local residents may decrease slightly in this area." Based on my experience using the Sweeney Ridge Trail System (approximately 4 days a week for the past 3 years), the proportion of dog walkers out of the total number of users is moderate to high and therefore adverse impacts should be moderate; not minor. Considering that most Bay Area state, county and local city parks do not allow dogs on-leash, there are not many options for dog walkers to choose from when they wish to hike with their dog on- leash. Dog parks are very limiting since they don't allow the owner to exercise with their dog. Other GGNRA sites are also limiting since they do not offer similar long and steep trails to hike that the Sweeney Ridge Trail System has to offer. Further, most dog walkers I've observed using the Sweeney Ridge Trail System are regular local community users. Therefore, visitation to Sweeney Ridge by local residents who wish to hike with their dogs on-leash would significantly decrease. Please explain how this information and analysis was derived since it conflicts with my experience and observations at Sweeney Ridge.

Please feel free to contact me via email at [redacted] if you have any questions regarding my concerns and comments. I would also like to request that you place me on your mailing list so that I may receive notifications of future public hearings and updates regarding the GGNRA Dog Management Plan/EIS.

Sincerely, Brett Becker, AICP Sweeney Ridge Trail User

Correspondence ID: 4310 **Project:** 11759 **Document:** 38106
Received: Apr,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Draft Dog Management Plan/Draft Environmental pact Statement

Dear Superintendent Dean:

I am a senior citizen and have lived in the Sunset District of San Francisco for 45 years. For the past 40 years, I have been jogging at Ocean Beach and Fort Funston several times each week, sometimes with a dog and sometimes without. In the 1970's I took my children to these beaches. I am a member of the SF Botanical Garden, the International Palm Society, and a supporter of the SF Opera and Ballet.

Although I am a strong supporter of the environment and I love seeing the shorebirds, I am opposed to your preferred alternative because the evidence you present of environmental damage by dogs is not strong enough to support such a drastic change in policy.

-The DEIS looks only at the impact of actions of dogs and does not consider the impact of the actions of humans or other factors even though you admit that these exist. For example, it states that Ocean Beach has had an oil spill and will probably have another. Page 1114 states that "the total elimination of dogs in the park would still leave disturbance effects on special status species by other factors, such as visitors without dogs who would continue to visit the park". Since the DEIS makes no attempt to identify impacts related to an oil spill or other visitors, there is no way to assess whether eliminating dogs from an area would make any difference at all. This analysis needs to occur before alternatives can be developed.

-The DEIS states in many places that dogs disturbing wildlife is a reason for restricting or banning them. However, the GGNRA's own statistics in Table 6 show very few documented instances of disturbances and few instances of dogs being in closed areas. Only 2 cases of disturbances are documented at Fort Funston. This is clearly not enough to justify removal of off-leash privileges.

-On p. 1250 in the section on Alternative A, the DEIS cites studies that have found that dogs disturb birds but fails to mention studies that do not support that claim. It also fails to discuss conclusions or statements in any of the studies that do not support the view that dogs disturb the snow plover. This does not follow the NEPA process, which mandates that a conclusion can only be reached after a study examining all the facts has been completed. For example:

1. The DEIS does not cite Forrest and Cassady St. Clair (2006) which studied diversity and abundance of bird and small mammals at 56 sites in urban parks, similar to the GGNRA, in Edmonton, Alberta. Half of the sites were visited by off-leash dogs and half were on-leash or no dogs. On-leash sites had high public compliance with leash laws. The study discovered that

whether a site was on- or off-leash had "no measurable effect on the diversity or abundance of birds and small mammals."

2. The Hatch report, which you cite (The November 15, 1996 report "Western Snowy Plover (a Federally Threatened Species) Wintering Population and Interaction with Human Activity on Ocean Beach, San Francisco, GGNRA, 1988 through 1996" by Daphne Hatch) actually found that there was an increase of more than 100% in the number of snowy plovers in the years after the 1979 Pet Policy went into effect (allowing dogs off-leash on Ocean Beach and elsewhere). Hatch could not find any negative relationship between the number of dogs on the beach at a given time and the number of plovers on the beach at the same time. The 1996 Hatch Report states: "Factors other than the number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach."

3. Although the Hatch Report makes the claim that "Disturbance [of plovers by dogs] results in lost energy intake due to reduced foraging and feeding efficiency, and increased energy expenditure as a result of fleeing from disturbance," it also says that "Little research has been conducted on the energetic expenditure as a result of fleeing from disturbance." Therefore one has to conclude that the first statement is a supposition, not a fact.

4. A follow-up 2006 Hatch Report considers effects on the numbers of plovers after two Federal Court rulings reinstated the 1979 Pet Policy, allowing off-leash dogs back on Ocean Beach. The maximum number of plovers ever recorded was in 1994, a time there were no restrictions on off-leash dogs on Ocean Beach.

In my own 40-year experience at Ocean Beach, I have not seen the number of shorebirds decline even though dogs have been allowed off-leash for most of that time. The DEIS agrees, stating that birds are numerous at Ocean Beach after many years of off-leash activity and recent "noncompliance" with leash laws. So it may be that you are "barking up the wrong tree" so to speak in restricting dogs in some places and banning them in others.

I believe the DEIS must examine all the studies, not just ones that support no dogs, and better analyze the impacts of other recreational uses and environmental phenomena before completing this plan.

Very truly yours

Joanne Scott

Received: Apr,26,2011 00:00:00
Correspondence Letter
Type:
Correspondence: Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean:

I am a senior citizen and have lived in the Sunset District of San Francisco for 45 years. For the past 40 years, I have been jogging at Ocean Beach and Fort Funston several times each week, sometimes with a dog and sometimes without. In the 1970's I took my children to these beaches. I am a member of the SF Botanical Garden, the International Palm Society, and a supporter of the SF Opera and Ballet.

I do not agree with the GGNRA's preferred alternative for the following reasons:

-The DEIS does not consider recreational uses of the GGNRA as it is required to do in it's enabling legislation. The legislation that created the GGNRA states that, the "Secretary of the Interior shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management". Yet none of the objectives in the DEIS includes recreational opportunities (Executive Summary, p.ii).

-The DEIS does not adequately address recreational components other than dogs and so one cannot logically conclude that it is the dogs/dog walkers that are causing the problems. Chapter 3, p.225, states that at Fort Funston "soil compaction is common along social trails that have been created by-- and e heavily used by--bikers, hikers, runners, and dog walkers " As a long-time Fort Funston user, I know this is true. I know also that horses are probably the biggest cause of soil compaction and feces. However, horses are not mentioned. At Ocean Beach, large foot races such as the "Turkey Trot" have taken place during the time the beach is closed to off-leash dogs because of the Snowy Plover's presence. The DEIS needs to do a more thorough job of identifying a full set of recreational components at each location where changes are proposed. Once this is done, it will be possible to do a quantitative analysis of the recreational components which are having detrimental effects.

-The DEIS does not address any of the beneficial effects of recreation, with or without dogs. For example, the Healthy People, Healthy Parks initiative encourages people to walk and exercise more. Statistics show, and I know personally, that having a dog encourages us to get out and to do just that. Recreational uses including dog walking have other benefits -- reduced stress, increased appreciation of the environment, better health, and

increased longevity. The GGNRA must balance these benefits against the benefits of reducing the amount of land available for recreation. But the DEIS has not done this; it only discusses the drawbacks of recreation and compares these to the benefits of increased preservation/conservation. A true analysis must compare the benefits and drawbacks of both recreational uses and preservation/conservation.

-The DEIS excludes the quality of the urban environment from its scope, but the GGNRA was established to provide needed open space for our large metropolitan area. Chapter 4, which discusses environmental impacts, should include a thorough discussion of the impacts to the San Francisco urban environment and to our city parks. However, these impacts have clearly not been analyzed. The discussion of each area contains essentially the same phrases, that there are 38 parks with a 10-mile radius and that the effects of increased use are not expected to be great. On p.424-, the DEIS states that impacts to Lake Merced, the closet off-leash park to Fort Funston, would be minor since not all dog walkers would stop using Fort Funston. But there are no numbers to support this. The DEIS must include the number of dog walkers currently visiting Fort Funston, the number expected to move to other areas, the acreage available to off-leash dog walking now and with the preferred alternative at Fort Funston, and the acreage available to off-leash dog walking in the Lake Merced area. Only with this information can a reasonable assessment of impacts to parks be developed.

In summary, I believe the DEIS is incomplete in its current state and doesn't have sufficient information to allow the GGNRA to arrive at an intelligent decision. It must: ? Provide for recreational opportunities as one of its objectives ? Identify all recreational uses and their impacts for the areas where changes to dog policies are contemplated ? Look at the benefits of recreation as well as the drawbacks when evaluating alternatives ? Clearly analyze the impacts to city parks using quantitative data

Very truly yours, Joanne Scott San Francisco, CA 94116

Correspondence ID: 4312 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

The purpose of this letter is to provide comments on the GCNRA proposed Dog Management Plan. These comments apply to the Alta Trail/Oakwood Valley area of the park. I feel I am well qualified to Comment on this area because I live in Marin City and have been taking walks in this area several times a week for over 25 Years. I am very familiar with how the trails and

fire roads in this area have been used historically and how they are used today. I am also familiar with the flora and fauna of this area, and how these have changed over the years.

I understand the basis for the rules governing dog management in the majority of our national parks, most of which are in less urban areas of our country. The GGNRA post-dates the urbanization of the Bay Area, and is in many cases immediately adjacent to areas that were densely populated well before the GGNRA was created. For this reason, I feel that the historic usage of GGNRA land adjacent to these populated areas should be taken into consideration when formulating the dog management plan. It seems to me that the goal of the plan should be to protect the GGNRA lands as they now stand, but not attempt to turn back the clock to when the adjacent lands were rural and the GGNRA did not exist.

Among the goals of the plan are to protect the existing wildlife from the impact of dogs, prevent erosion of the land, maintain area access for fire fighting purposes, protect the endangered blue butterfly habitat, promote the access and enjoyment of the area by the public, and accomplish these goals without undue expenditure of park resources (budget and manpower).

In my opinion, based on my observational qualifications summarized in the first paragraph above, the Dog Management Plan proposed by the Park Service for the Alta Trail Oakwood Valley area is unnecessarily restrictive to achieve the goals put forth by the Park Service. I will go through these goals in detail now, presenting the basis for my positions in each case.

The Dog Management Plan proposes to designate the lower part of the Oakwood Valley Fire Road as a ROLA route. I agree with the proposed designation of this route. I feel that the designation of the Oakwood Valley Trail as a no dogs allowed route is acceptable because dog walkers will still have use of the parallel fire road to walk their dogs. Since the trail is narrower than the road, it will be easier for non dog walking users to use it comfortably since they will not have to squeeze by dogs when using it. My only comment on this section of the Fire Road is that I think it is rather a waste of money to build a fence on either side of it. I can't imagine what purpose it achieves. The road is lined on both sides by a wall of poison oak. The only thing sensitive about the habitat here that could be impacted by straying from the road is the skin of the straying humans to the consequences of contact with the poison oak. Certainly the dogs can and do run off the road, but their impact in doing so is nil. The wildlife adjacent to the road has been living with dog walkers for decades and are quite accustomed to making any accommodations for domestic dogs. You should forget the fence and use the funds saved for much more worthwhile park projects. I will address the adverse impact of the proposed fence on the local

wildlife later in this letter.

The Dog Management Plan proposes to designate the stretch of the Alta trail from the Donahue cul-de-sac to the Orchard Fire Road as a leash required area. It also designates the upper stretch of the Oakwood Valley Fire Road and Trail from the proposed Double Gate up to where it joins the Alta Trail as a leash required area. I am very puzzled why you have made this designation, instead of also making it a ROLA route. This route has been effectively used as a ROLA for decades now with no undue effect. It has the same habitat and usage as the Oakwood Valley Fire Road. I would have found it acceptable to designate the Oakwood Valley Road as ROLA, then there is no logical reason why the remainder of the Fire Road and this section of the Alta Trail (actually a road as you know-- it used to be called Alta Ave.) should not also be designated a ROLA. Impact on wildlife is again negligible since the birds, rabbits, mice, gophers, deer, and coyotes that live or hunt adjacent to the roads have been living with the unleashed dogs for decades, and just stay away from the road when it is being used by humans. Using the excuse that this is endangered blue butterfly habitat to impose a leash requirement is a red herring. The dogs do not trample the lupine (blue butterfly food source) growing in the area, and the humans generally stay on the road, where the lupine does not grow. You have also included the lower part of Alta Avenue (starting at the Donahue cul-de-sac) as a leash required zone, which surprises me since this stretch, although having an NPS easement, is not even within the Park boundaries. I would not think you would legally have the authority to impose a Dog Management Plan on this portion of Alta Avenue, which lies outside the park.

For some reason the short (approximately two city blocks long) stretch of Alta Ave. that runs from the Orchard Fire Road intersection to the New Gate has inexplicably been designated as a no dogs allowed zone. This makes no sense whatsoever since it prevents weekend hikers with dogs from making a loop trip along the Oakwood Valley Fire Road and Alta Ave. I can see no logical basis for designating these two blocks as a no dog zone since it has dog walking allowed zones at either end of it and has the same habitat as these dog walking allowed zones. This nonsensical designation should certainly be corrected in the final plan.

I now want to present a few more reasons why the leash required routes (plus the two-block long section described in the preceding paragraph) should be designated as ROLAs rather than leash required routes. One of the objectives of the GGNRA, besides protecting the environment, is to promote the enjoyment of the area by the adjacent human population. Based on my observations, the primary users of the Oakwood Valley Fire Road/Alta Avenue routes are walkers, followed closely by dog walkers, then to a somewhat lesser but still significant extent, bicycle riders followed by

joggers. The vast majority of these users, particularly, of Alta Ave., live locally. I would estimate that on weekdays over 95% of Alta Avenue users are locals, and on weekends over 90%. During the day some of the dog walkers are professional dog walkers. But the vast majority of the dog walkers on Alta Avenue are locals taking their dog out for their daily walk (often in the early evening after work). And the majority of them currently do so without the use of a leash. And why not? There is no good reason to use a leash up there. If you want to maximize the enjoyable use of the area by the public, you should have very, legitimate reasons for prohibiting unleashed dog walking on Alta Avenue. By requiring the use of leashes you will be reducing the enjoyment of the area by the public by a significant degree, and will be generating some very irate citizens who have been walking their dogs there for decades.

I now want to address a consideration involving erosion prevention. While this particular consideration is somewhat peripheral to dog walking, since dog walking does not cause erosion, it is a central consideration for preservation of the road for recreational use access and fire fighting purposes, and also has an impact on wildlife protection, blue butterfly preservation, and the park budget, all of which I believe adds some necessary perspective to the Dog Management Plan. This human activities impact is a case of "we have met the enemy and they is us." Or, to be more exact, they is GGNRA personnel and GGNRA contractors. The truth is that an impact on the Oakwood Valley Fire Road/Alta Avenue routes that dog walking may have is trivial compared to that perpetuated by GGNRA personnel and GGNRA contractors. Winter after winter I have seen park and contractor vehicle using Alta Avenue (and the adjacent roads) while those roads were still wet and muddy. These vehicles' wheels make ruts in the rain softened roads. The runoff from the subsequent rains run down these ruts and end up causing severe erosion of the roads. To mitigate the damage to the roads caused by your own vehicles using them in winter when the roads are wet, huge Caterpillar earth movers are brought in during the dry season, at significant expense I am sure, to scrape another 6-inches off the surface of the roads to attempt to correct the erosion. There is no need to allow park service or contractor vehicles to use these roads to perform surveillance or other maintenance activities in winter. Their use as fire roads is not required in the middle of winter. The GGNRA should create administrative rules that prohibit the use of these dirt roads by park and contractor vehicles when they are wet and muddy until they dry out, except in cases of emergency. The impact of your use of motor vehicles on these routes (and occasionally off road - I have seen it!) is exponentially greater than the impact of dog walkers.

And other human activities also make the impact of dog walking trivial by comparison. For example, the clearing, several years ago, of the large eucalyptus groves on the ridge slope between the Oakwood Valley Fire

Road and Alta Avenue, along with removing the lower branches of the Monterey Cypress trees along Alta Avenue, had an environmental impact on the flora and fauna in the area that was relatively enormous compared to that of dog walking. The ongoing well-meaning experiments with Scotch and French Broom removal and suppression along a stretch of Alta Avenue have had a much greater impact on the flora and fauna there than dog walking could ever have. Even the gas line surveying done last year along Alta Avenue had a relatively significant impact from wheel rut generation both on and off the road and the removal of plants and limbs to clear the lines-of-sight necessary to perform the surveys. I am not decrying these human activities (except their performance in the winter when the roads are muddy and susceptible to rutting). Certainly the road must be maintained passable to enable its use for fire fighting and recreational access. The eucalyptus removal was part of a federal program to reduce the threat of wildfires to housing in adjacent settled areas (which I directly benefited from), and PG&E must be allowed to survey and maintain their gas and electrical lines that pass through the area. I am pointing out these environmentally impactful human activities only to provide some degree of perspective on the relative impact of dog walking on the area. The point I am trying to make by bringing them up is the degree to which these necessary human activities trivialize to the point of vanishing any impact that dog walking could have on the area even in dog walking's wildest dreams. And yet the Park Service still wants to impose unnecessarily severe walking restrictions even though it will result in a significant loss or benign use and enjoyment of the area by the local residents.

Another consideration I would like to point out is the fact that the proposed fence that the Plan currently shows being built along the Oakwood Valley Fire Road will in all likelihood have a greater negative impact on the local wildlife than the off-leash dog walking that will be allowed there. Having a Fence there will not allow wildlife to cross from one side of the road to the other, which I am sure it currently does all the time when dogs are not present. In recent years we have become more and more aware of the severe impact that fenced roads have on wildlife and the environment. The infamous I-75 highway across the Everglades in Florida is probably the most egregious example of this. In the Canadian Rockies, the Canadian government is busy constructing under- and over-passes crossing the main north-south highway to allow wildlife to go from one side to the other. While it is true that the length of the Oakwood Valley Fire Road being fenced is much shorter than those examples, it will be a significant barrier for any animal smaller than a deer or coyote. Another adverse environmental impact of the plan as currently formulated will be the additional vehicular traffic by park police performing the surveillance needed to enforce the new restrictions. This added vehicular traffic will have a greater impact than the dogs being walked that they are trying to control. Those vehicles will rut the road in winter and may well run over more

wildlife than any dogs might catch; even a few blue butterflies are likely to end up on their front grills.

And finally I want to point out the impact that construction of the fence and gates and the requirement for ongoing surveillance by park police to enforce the policy will have on the GGNRA budget. I am under the impression that almost all national parks have a long list of projects and maintenance that require attention but end up being neglected for lack of funds. I am sure that must also be the case in the GGNRA. By imposing the Dog Management Plan proposed for the Oakwood Valley Fire Road/Alta Avenue routes, you will be diverting funds from other projects that would be much more worthwhile to the park and its users than the overly and unnecessarily restrictive dog management plan as currently formulated. In my opinion, the cost of gate and fence construction and the ongoing expense of park police vehicle and personnel time would be better spent on more worthwhile projects.

I do not own a dog and am not a dog walker, so my use of this area of the GGNRA will not adversely be affected if the Dog Management Program as currently formulated is imposed on the Oakwood Valley Fire Road/Alta Avenue routes. But on my almost daily walks in that area I encounter many people walking their dogs, and observe how much enjoyment both the dogs and their owners derive from that activity. So while I am probably as impartial as it is possible to be on this issue, as well as being very familiar with that area and its flora and fauna, I am inclined to default in favor of the dogs if there is not sufficient reason not to. I certainly would not favor or support slackening the dog management rules that exist in other national parks, where the natural environment does not, and historically did not, support the walking of dogs. Introduction of unleashed, or even leashed, dog walking in those parks would unquestionably have detrimental effects on the natural environment. However, I feel that the Oakwood Valley Fire Road/Alta Avenue routes of the GGNRA are a different situation and that the continued unleashed walking of dogs there will not have a negative effect and should be allowed to continue. In this letter I have tried to provide a logical, responsible, and well reasoned basis for this position, and hope you will take my arguments into consideration when making your final decisions regarding the dog walking plan for this area.

Thank you for your consideration,

Robert Hollingsworth

Correspondence ID: 4313 **Project:** 11759 **Document:** 38106
Received: Apr,20,2011 00:00:00
Correspondence: Letter

Type:

Correspondence: Re: GGNRA Draft Dog Management Plan / Environmental Impact Statement

Dear Superintendent Dean:

The purpose of this letter is to let you know as a resident of San Francisco and a frequent visitor to Golden Gate Park and Crissy Field, I really do not like your plan to further restrict dog walking in the parks. Although I do not personally own a dog I often walk my sister's dog and love to see dogs and their owners in the park having a great time. You must realize San Francisco is a "dog city" and we need to provide them places like Crissy Field to get some exercise, socialize and enjoy the beautiful beaches. Your Alternative C would be far too hard on dogs and their owners.

As a taxpayer I cannot believe how much money you have already spent on this and how much more you intend to spend to implement your choice. What a waste of time and money. Perhaps you are over-staffed and over-funded.

The telephone survey you rely on is a joke. Nearly half of the responders did not even know how long they had lived in the Bay Area. You must have known by conducting the survey right after the Diane Whipple trial a lot of people would be afraid of dogs off-leash. I grew up in Chicago so know all too well how local officials plan things to get the numbers they want. That reminds me of another problem with your plan. The idea you would send people out to count how many dog walkers are not complying with the new rules is just the kind of thing a government official in Chicago would do. The only way people will ever believe the count was honest is if members of the public, including numerous dog owners, are allowed to participate in that count to be verify the accuracy of the numbers.

If you feel there must be more restrictions placed on dogs at Crissy Field make the Promenade an on-leash area. Otherwise everything else in Alternative A alone. You should also repair the fences around the sand dune if you do not want people and dogs to stay out of there. Some signs would also help.

Finally, I have a very difficult time walking on the Crissy Field Airfield. I have had several foot surgeries in recent years and do not want to have any more. It is dangerous out there with thousands of holes. Why have you chosen the alternative that makes seniors and people with walking problems walk the furthest to enjoy off-leash dog walking? That really is not fair.

Respectfully,

Sally Hanson

Correspondence ID: 4314 **Project:** 11759 **Document:** 38106
Received: Apr,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Attn: DEIS for Dog Management

Dear Superintendent Dean:

As members of the Golden Gate National Parks Conservancy and frequent visitors to many of the wonderful areas in the GGNRA, we are writing to express our strong support for no change in the current off-leash policy for dogs at Fort Funston. We attended the Open House meeting held on March 5, which was informative and helpful to our understanding of the proposed changes. While there, with the help of a park employee, we were able to examine the data in the DEIS regarding annual reports of dog bites and related problems at Fort Funston. Based on information in Appendix G (Law Enforcement Data), it appears that in 2008 (the most recent year for which data are provided), only three reports of dog bites were taken by LE Rangers and four by USPP. (In addition, there were some reports taken for a category labeled as "Haz Conditions/Pet Rescues.") Surprisingly, we did not find estimates for annual numbers of visits to Fort Funston that could serve as a denominator for determining actual rates of adverse events. But based on our personal experience over many different days of the week and at different times of day, Fort Funston is very popular: the parking lot is often close to full, and dozens if not hundreds of people, with and without dogs, are enjoying the area at any given time. Presumably there is underreporting of problems, but even if the reported numbers were multiplied by a factor of five or ten, it would seem that the rate of dog bites per number of visits is extremely low.

On the other hand, the rate of "happy people with happy dogs off leash" is arguably very high. Given what appear to be large numbers of people who regularly frequent Fort Funston, it is obvious that many Bay Area residents thrive under the current policy. They take advantage of the opportunity to exercise by walking the trails of Fort Funston and, in so doing, to experience the very positive social interactions that spontaneously occur among people when dogs are in the mix. We believe that the "plus" side of maintaining the current off-leash policy far outweighs the relatively few negative reports.

As an older couple, we are concerned that the elderly and disabled who might have difficulty walking with a both a cane and a leash'and who therefore currently enjoy having a scenic place where they can safely and securely have their dogs off leash'will be discriminated against if they are

relegated to the much less desirable sandy area near the parking lot at Fort Funston, as proposed in the DEIS. The other proposed off-leash area at Fort Funston is down at the beach itself, but that is an area that many, if not most, elderly or disabled individuals are physically unable to access. The sandy area near the parking lot is difficult to walk in and will only become more undesirable if all off-leash dogs are required to concentrate there. Fort Funston, because of its openness and the large number of visitors at most times, is also a relatively safe place for women walking alone to give their urban dogs the freedom to run and play.

We frequently bring out-of-town guests (without dogs) to Fort Funston, and they invariably respond positively to the wonderful sense of outdoor freedom and enjoyment that comes from seeing so many happy creatures (human and canine alike) frolicking against one of the most beautiful natural backdrops in the world.

In short, the data in terms of public safety suggest that the current policy has resulted in very few harms to the public relative to its strong positive effects for so many. In addition we are concerned that the proposed limitations in the off-leash areas at Fort Funston will be disproportionately unfair to the elderly and the disabled. Given the tremendous "urban joy" that accrues from the current policy, is there really a need to change it?

It goes without saying that responsible dog ownership is critical, including keeping any potentially bad mannered dogs away from Fort Funston altogether and cleaning up after every dog.

Thank you very much for your attention.

Sincerely,

Martin & Virginia Ernster

Correspondence ID: 4315 **Project:** 11759 **Document:** 38106

Received: Apr,25,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

Subject: Golden Gate National Recreation Area Dog Management Plan/Draft Environmental Impact Statement, Marin, San Francisco and San Mateo Counties

The Department of Fish and Game (DFG) has reviewed the Golden Gate National Recreation Area (GGNRA) Dog Management Plan draft

Environmental Impact Statement (EIS) and appreciates this opportunity to convey our comments.

National Park Service Preferred Alternatives

DFG recognizes the lengthy and on-going public decision making process conducted by the GGNRA in preparation of the draft EIS. In general, DFG believes that the National Park Service (NPS) Preferred Alternatives represent a reasonable consideration of biological resources in balance with other demands on GGNRA lands. DFG recognizes that the Environmentally Preferable Alternative (Alternative D) was selected for many sites as well as for New Lands. DFG also recognizes that in several cases where the NPS Preferred Alternative is other than the Environmentally Preferable Alternative, the NPS Preferred Alternative is indistinguishable from the Environmentally Preferable Alternative with respect to effects on wildlife. In general, DFG appreciates this opportunity to communicate our overall support for the project as proposed in the draft EIS. We encourage GGNRA to consider the following site-specific comments in preparation of the final EIS.

In cases where Alternative D is not the selected alternative, it is unclear if the Park Stewardship Programs Initiative projects will truly offset the differences in impacts between the selected Alternative and Alternative D as it appears that the implementation of these programs is unrelated to the Alternative adopted. It generally appears that the adoption of Alternative D is most consistent with the overall success of these projects.

Oakwood Valley

The NPS Preferred Alternative (Alternative C) differs from the Environmentally Preferable Alternative in the designation of a regulated off-leash area (ROLA) on the Oakwood Valley Fire Road. Under Alternative D, dogs would be required to be leashed. As stated in the draft EIS, the adoption of Alternative C at this site is likely to result in minor adverse impacts to vegetation. DFG recommends that Alternative D be selected as the adopted alternative as it, by requiring dogs to be leashed on the fire road, would largely avoid impacts to vegetation which may result from trampling, digging, and waste.

Rodeo Beach/South Rodeo Beach

The NPS Preferred Alternative (Alternative C) differs from Alternative D in the designation of an extensive ROLA on Rodeo Beach which under the Alternative D would be split between areas designated for on-leash recreation and areas closed to dogs. Within the ROLA, permit holders would be allowed to have up to six dogs off leash. As stated in the draft EIS,

the adoption of the Alternative C at this site is likely to result in moderate adverse impacts to coastal foredune vegetation due to the large size and location of the ROLA, resulting in long-term adverse impacts to marine mammals and birds. DFG recommends that Alternative D be selected as the adopted alternative as it, by a combination requiring dogs to be leashed and prohibiting dogs from portions of the beach, would avoid impacts to vegetation which may result from trampling, digging, and waste and avoid impacts to marine mammals and birds which may result from repeated flushing, barking, biting, or other pursuit or contact.

Crissy Field

The NPS Preferred Alternative (Alternative C) differs from the Environmentally Preferable Alternative in the designation of a ROLA along the shoreline of Central Beach. Under Alternative D, dogs would be prohibited in this area. As stated in the draft EIS, the adoption of Alternative C at this site is likely to result in minor adverse impacts to coastal dune vegetation; long-term moderate adverse impacts on shorebirds, gulls, terns and marine mammals; and long-term adverse impacts to the federally threatened western snowy plover. DFG recommends that Alternative D be selected as the adopted alternative as it, by prohibiting dogs from the Central Beach shoreline, would avoid impacts to coastal dune vegetation which may result from trampling, digging, and dog waste; impacts to birds which may result from repeated flushing; impacts to marine mammals which may result from biting, barking, or physical contact; and impacts to snowy plover which may result from harassment, including interruption of foraging and roosting behavior.

Ocean Beach

The NPS Preferred Alternative (Alternative C) differs from the Environmentally Preferable Alternative in the designation of a ROLA on the beach north of Stairwell 21. Under Alternative D, dogs would be required to be leashed in this area. As stated in the draft EIS, the adoption of Alternative C at this site is likely to result in minor adverse impacts to beach vegetation, long-term moderate adverse effects on shorebirds, gulls, and terns and marine mammals, and potentially limit use of preferred habitat by the federally threatened western snowy plover. DFG recommends that Alternative D be selected as the adopted alternative, as it, by requiring dogs to be leashed north of Stairwell 21, would avoid impacts to birds which may result from repeated flushing; impacts to marine mammals which may result from biting, barking, or physical contact; and impacts to snowy plover which may result from harassment.

Fort Funston

The NPS Preferred Alternative (Alternative C) differs from the Environmentally Preferable Alternative in the designation of a ROLA on the beach south of the Beach Access Trail and designation of a ROLA between the parking lot and Sunset Trail. Under Alternative D, dogs would be required to be leashed on the beach, dogs would be excluded off-trail between the parking lot and Sunset Trail, and a ROLA would be established at a site adjacent to the Habitat Protection Area. As stated in the draft EIS, the adoption of Alternative C at this site is likely to result in minor adverse impacts to coastal dune vegetation, long-term major adverse impacts on wildlife, and long-term minor-to-moderate adverse impacts to San Francisco lessignia. DFG recommends that Alternative D be selected as the adopted alternative, as it would, by requiring dogs to be leashed on the beach and excluding dogs off trail between the parking lot and Sunset Trail, avoid impacts to coastal dune vegetation and San Francisco lessignia which may result from trampling, digging, and dog waste; impacts to birds which may result from repeated flushing; and impacts to marine mammals which may result from biting, barking, or physical contact.

If you have any questions, please contact Mr. Richard Fitzgerald, Coastal Habitat Conservation Supervisor, at (707) 944-5568; or Mr. Scott Wilson, Environmental Program Manager, at (707) 944-5584.

Sincerely,

Carl Wilcox Regional Manager Bay Delta Region

cc: State Clearinghouse

Correspondence ID: 4316 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Supt. Dean:

I am writing to urge you not to implement the proposed changes to the off-leash areas in the GGNRA. I have lived in San Francisco for fifteen years and have a family including a young child and a three-year-old puppy. We especially love hiking as a family with our dog on Montara Mountain (where we usually only run into a few other people or dogs), as well as Ft. Funston, Crissy Field, Ocean Beach and Muir Beach. We enjoy seeing people of all ages, races, family units, and well-socialized dogs out at these beautiful places. I believe that part of the wonderful charm of San Francisco is the openness and tolerance of the people, which is reflected in how beautifully the dogs play when out in these open park spaces. In over a decade of using these spaces heavily with and without a dog I have not

encountered any dog fights in any of them. (The only violence at all that I can think of is hearing on the news that someone was stabbed in the Ft. Funston parking lot, by another person, of course, who was not a dog owner.)

This plan, if implemented, will make the Bay Area less healthy and more dangerous for both people and dogs. Everyone who works with dogs is well familiar with the fact that a dog who is allowed to run and play in open spaces and play and socialize with other dogs is less neurotic and much better behaved than dogs who are left at home or tied up in the yard--those dogs are the ones who become aggressive and hard to control. An excellent example of this is the great behavior of all the dogs who showed up at the protest march on Mar. 21.

Please keep the Bay Area safe and healthy for everyone, and resist these blanket changes that would sabotage something that should be a model for the rest of the state, if not the country. Thank you for your time.

Sincerely,

John Blair

Correspondence ID: 4317 **Project:** 11759 **Document:** 38106
Received: May,20,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Sir ,

I would like to comment on the rush to judgment proposed in the new guidelines restricting off-leash access to the GGNRA. Rather than formalizing the 1979 Pet Policy, the proposed new regulations are draconian in their scope.

No concern appears to have been shown for those of us, whose main recreation is walking with our dogs in the GGNRA. Elderly dog owners and many others cannot adequately exercise their dogs while the dogs are on leash. As concerned, responsible citizens, we do all in our power to prevent any ecological damage.

The proposed Compliance-Based Management Strategy is much too far-reaching and should on no account be included in any final plan.

Finally, it appears that no credible scientific basis was used in reaching the conclusions of damage caused to wildlife and environment by dogs. Simple observation shows that children cause more damage and I see no mention of

children being banished from all these areas within the GGNRA.

Sincerely,

Peter Blumberg

Correspondence ID: 4318 **Project:** 11759 **Document:** 38106

Received: May,20,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Sirs/Ma'am,

I am writing to convey my concern about the park's current policy of allowing off-leash dogs all almost all the Golden Gate National Recreation Area, and to request that any future rules or regulations require dogs to be on a leash in most park areas. I have a six year old son and I frequently take him to the Crissy Field Beach, and we are constantly over-run by off-leash dogs who have taken over the beach. The dogs urinate and defecate all over the beach, and while many owners do clean up their dog's poop, some do not and no one can do anything about all the dog urine all over the beach. Kids who play in the sand are constantly exposed to this dog urine and excrement, which is both unpleasant and unhealthy. On many occasions my son has been approached by a fast running dog, which has often frightened him. I have refrained from taking my son to Fort Funston at all, despite the beautiful vistas and the interesting hang gliders, due to that park being completely overrun by off-leash dogs that spoil the park experience for anyone who is not a dog owner. Again, dogs at Fort Funston urinate and defecate all over the park which can't be good for the natural environment and the species of animal and plants that live there.

My suggestion is that the GGNRA require all dogs to be on-leash, but that you request a waiver from the National Park Service from the current six foot leash requirement, and allow dogs to be on leashes up to 12 feet long, to allow more freedom to dog owners and their pets. A 12 foot leash permits a dog to run a little while still being under control by their owner. I also believe that the GGNRA should designate or develop two or more fenced off-leash dog areas on GGNRA lands in Marin County and in San Francisco, much like other jurisdictions, so owners who want to run their dogs off-leash can do so in these areas. Examples of these fenced off-leash dog areas exist in Golden Gate Park and in my own town of Alameda.

Thank you for your consideration of my suggestions. There is a reason that every other town, city, and county requires dogs to be on leash in their parks. Unleashed dogs pose a threat to each other, to children and adults visiting the parks, and to the natural environments, wildlife, and plants that

make our parks such wonderful places to visit.

Sincerely,

Jeff M. Wasserman

Correspondence ID: 4319 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendant Dean,

I am writing this letter to express my serious concerns about the proposed changes to the dog management policy for GGNRA. Fort Funston is the area of the GGNRA that I am most upset about, since I have been walking my dogs off-leash there almost daily since 1982. For me, Fort Funston has been the quintessential park, an unsurpassed nature experience, actually within the city limits of San Francisco. The wildness of the park, the expanse, the beauty of the cliffs, beach, and ocean have been a refuge from city life for me and my dogs, that is incomparable.

Walking dogs off-leash at Fort Funston has been a reason for countless people with dogs to make Fort Funston a destination. I have friends and out-of-town visitors without dogs for whom the sole attraction of the park is the dogs themselves. It goes without saying that allowing dogs to be off-leash benefits both humans and dogs alike: it's much more enjoyable for both, and the dogs get proper exercise. People who know dogs know that a well-exercised dog is a good dog.

In the twenty-nine years that I've been walking at Fort Funston, I've never seen a serious dogfight among the off-leash dogs, nor have I ever seen a person attacked or harassed by a dog. I haven't seen vegetation destroyed by dogs, with the exception of areas of summer foxtails that get trampled. On the other hand, I have seen dramatic effects by wind and water over the years on the plants, cliffs, and hilly areas.

Fort Funston is truly a magnificent multi-use park with its hang-gliders, occasional horses, cyclists, joggers, hikers, families, professional dog-walkers, birders, model airplane enthusiasts, school groups for nature study, and of course, many off-leash dogs and their happy owners. All of these diverse groups have been very successfully coexisting for years. Why change it?

When I attended one of the GGNRA informational meetings at Ft.Mason a few months ago, I was told by one of the rangers I talked with that I could

"vote" for no changes to the present dog policy for GGNRA. Please accept my "vote": no changes to the current dog policy. If, however, changes are destined to be made, I hope that "one size fits all" would not have to be applied to Fort Funston.

Sincerely,

Janice McIntosh San Francisco, 9413

Correspondence ID: 4320 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Draft Dog Management Plan, Draft Environmental Impact Statement

Dear Superintendent Dean:

I am a native San. Franciscan, life-long resident, disabled, and do not have a dog. Last year I had to undergo grueling medical treatments. For both my mental and physical health I made a point to visit nearby Fort Funston of the GGNRA when I could. I knew getting out of my social isolation was essential. I knew watching dogs play would bring me joy. I knew encountering the occasional extroverted dog would give me the chance to pet a dog and get a few face licks. My medical team told me I had to start walking as often as I was able. Given my physical state and being a woman, I wanted to be safe. Fort Funston, with its open-air format and the natural comings and goings of people and off-leash dogs was the perfect place.

After not showing up at the Fort for a few days, a voice called out to me, "How ya doin'?...Haven't seen you lately." I was surprised and had no idea who was talking to me. She was a professional dog walker. I quickly learned there was a vibrant social community at the Fort and that I was welcomed into it. She continued to keep tabs on me and does to this day. She has driven me to doctors' appointments and surgeries. She has become a vital part of my social support network.

I have never encountered a more cohesive, caring, self-policing, and diverse community. I have met other disabled and senior folks who visit Fort Funston for many of the same reasons I do. One woman told me she knows if she collapses on the trail due to her health condition (as happened to her once before), she and her dog will be taken care of by the people there. Finding this unique community has been essential to my wellbeing and I don't want to see it disappear.

I oppose the Preferred Alternative because it is too restrictive. There is no

justification in the DEIS for major changes. I support formalizing the 1979 Pet Policy PLUS off-leash access in San Mateo County and on new lands that the GGNRA acquires in the future. At one point, I enjoyed Mori Point and do not want to see added restrictions there.

The DEIS does not consider impacts on the health (physical, mental and socialization) of people if dog walking is severely restricted. Additionally, the DEIS does not consider the impacts on social communities including people with dogs at GGNRA sites if severe restrictions take effect. The DEIS does not consider negative impacts on the disabled, as well as minorities, who lose access to dog walking. The DEIS should add a section evaluating the benefits of recreation. Please leave the "Recreation" in the "Golden Gate National Recreation Area."

Compliance-based Management Strategy cannot be part of any plan. It changes status of areas (off-leash becomes on-leash; on-leash becomes no dog) automatically and permanently if GGNRA claims not enough compliance with new restrictions. No evidence of impacts from non-compliance are necessary, only the fact that there is non-compliance. This will potentially end off-leash access without giving people a chance to comment on the change. This punishes responsible dog owners for the bad actions of a few irresponsible ones. It must be opposed and removed.

The GGNRA should develop a new alternative, the A+ Alternative, which will better balance the recreational needs of the Bay Area with protection of natural resources.

Thank you for your time.

Respectfully,

Lisa Kucukdogerli

Correspondence ID: 4321 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: TO: Frank Dean, General Superintendent

I am a 30 year resident of San Francisco, a mother of two boys and a dog owner. Walking our dog at Fort Funston is a regular part of our family's routine. I am there at least once a day and my two boys walk there every weekend and evenings in the summer. Our walks with our very well behaved dog gives our family a chance to exercise together, to learn about nature, to meet people, and to enjoy watching our dog bound along the hills

and play with other dogs. My boys and I have spent many mornings volunteering the monthly Fort Funston clean ups. And with all the thousands of how's we have spent there over last 5 years, we have seen exactly two serious dog vs. dog altercations, and zero involving, a dog and a person.

In San Francisco, we are blessed with a good deal of open space. With 220 parks in our Rec & Park system, and over 1000 acres in Golden Gate Park, there are quite a lot of places for people to enjoy nature and not to interact with dogs. While I live right next to Stern Grove and Ocean Beach, I do not take my dog there because of the "leash only and no dog" regulations of those parks, respecting those regulations are in place to protect certain species and people who want a dog free experience.

Fort Funston, which has been an off leash dog paradise since the US Army left, is the one place in San Francisco where dogs can go for extended runs off leash, a necessity for my dog. There are areas of Fort Funston that are already fenced off to protect birds and plants, and we respect those boundaries now. The problem is the lack of skilled rangers. I don't know how many park rangers you have up there, but they are NEVER around and NEVER doing anything. I have been at Fort Funston in the morning and chased out people illegally camping, sometimes in a Winnebago parked on the trail. If you really want to protect the park and the endangered species, why don't you simply provide competent park rangers to enforce the existing rules? And chase out the campers, the partiers and the other miscreants?

The Preferred Alternative is not acceptable. It is overly restrictive, and its restrictions are not justified by the totality of available data. It is based on separation and exclusion, a management philosophy that goes against the values of the Bay Area in which it is fully immersed. It violates the mandate for the "maintenance of needed recreational open space" contained in the legislation that created the GGNRA. The contraction of areas available for off-leash recreation will significantly compromise the park experience for people with dogs, and could lead to an increase in conflict as more and more people are forced into smaller and smaller areas. The impacts of people moving from the GGNRA into city parks is not adequately addressed in the DEIS. Any alternative must address these impacts on city parks and ways to mitigate them.

What is acceptable? From the south parking lot to the northern most end or the Coastal Trail, and the total area between the Coastal Trail and Horse Trail, the eastern slope down to Skyline as well as the beach and the access paths, should all be Regulated Off-Leash Areas. The hang glider area and the areas currently restricted areas should continue to be off limits to dogs. Please do not implement the overly restrictive Preferred Alternative. The Golden Gate National Recreation Area may be a National Park, but it is not

Yosemite. It is our backyard.

Sincerely,

Cammy Blackstone

Correspondence ID: 4322 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Park Profiteers - Dog Drivers in GGNRA

This letter is in support of the DEIS for Dog Management in GGNRA.

Having watched vanloads of dogs unloaded onto park property, I support whatever means GGNRA needs to control them. To site one location, Baker Beach, I have personally watched vanload after vanload of dogs arrive as paid dog drivers open up their vans and allow unleashed dogs to run onto the beach without any controls. They are not so-called dog "walkers", they are dog drivers - they drive dogs to parks and dump them there.

Multiple groups of offleash dogs delivered by dog drivers join together. These uncontrolled packs of dogs run free and make it difficult to control my own dog and walk freely in the park myself.

Dog drivers have up to a dozen dogs and some bring multiple groups of dogs the same day. At the going rate of \$20 and up per dog, that's at least \$200 per delivery, which easily adds up to a six-figure annual income for doing nothing more than driving a dozen dogs to the park and dumping them on public lands. The parks earn nothing from this misuse of park land.

How many of the park plan protestors are dog drivers misusing public parks for their personal profit? They have monetary motivation to protest the reasonable response of the GGNRA to dog use and misuse of our public parks.

There is so much money at stake for dog drivers that I do not want my name on this public comment for fear of financially motivated retribution.

So I am signing this - from a "real dog guardian".

Correspondence ID: 4323 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Dear Superintendent Dean,

My name is Dolly Ford. I am a tax payer and I have lived and worked in the Bay Area for over 7 years. My husband and I own a home in Redwood City and we have a 6 year old dog named Lily.

I consider Fort Funston to be one of the happiest places on earth. On any given day (fog, rain or shine) countless adults, children and dogs co-exist peacefully. The natural beauty and enthusiasm of the people and the dogs fosters a sense of joy and community like few places I've ever been. Strangers, humans and dogs alike, greet each other, play, relax and spend time together.

A visitor of mine from Kyoto recalled Fort Funston as her favorite memory of her trip; she kept a photo of her and my dog Lily on the beach as her computer desk top for many months. Everyone I've ever introduced to Fort Funston can recognize its unique spirit and beauty.

In over 7 years of visiting Fort Funston I cannot recall a single incident of conflict or of someone being disrespectful of the natural environment. Due to this I am skeptical of the draft EIS's claim that the presence of dogs is having a significant negative impact on wildlife. All such claims need to be substantiated with well documented, site specific, scientific evidence that also analyzes the impact of other recreational uses of the space (i.e. equestrians, boaters, fishermen, hikers, bikers, runners, hang gliders, etc). This evidence needs to be compiled and fully and fairly disclosed to all parties so that a well informed plan can be implemented.

The maps that I have seen of the proposed off leash dog walking area included in the GGNRA's preferred alternative plan For Fort Funston would lead to over crowding and unsafe conditions.

I respectfully ask that the GGNRA, in developing a general management plan, will take into consideration the unique spirit and community of the Fort Funston Area. It is such a small portion of public land, but it is very meaningful to the people, families and dogs that visit Fort Funston on a regular basis. I fully support Alternative A, the No Action alternative of the DEIS, as it relates to Fort Funston.

Sincerely, Dolly Ford Redwood City, CA 94063

Copies sent to: Secretary Ken Salazar, Department of the Interior Christine Lehnertz, Regional Director, National Park Service, Pacific West Region Jon Jarvis, Director National Park Service Nancy Pelosi, Member, U.S. House of Representatives Diane Feinstein, U.S. Senator State Senator

Correspondence ID: 4324 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking

rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely,

Jon Behar San Francisco, CA 94133

Correspondence ID: 4325 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

As a research scientist, a wife, a dog owner, frequent park visitor, and a client of a professional dog walker, I am writing to adamantly oppose the GGNRA's draft dog management plan. Sadly, this plan lacks a foundation in science; instead, it relies falsities and non-logical conclusions. In addition to lacking a foundation in the facts, this plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their pets at these parks.

With community support and education, the GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite, Glacier, and Yellowstone. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from

recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Align commercial dog walking rules with county or city regulations.

From my personal experience, Fort Funston, Ocean Beach, and Golden Gate are a crucial component of my family's mental and physical health. We frequently visit (3-5 times per week) these parks with our 1-year-old Portuguese water dog named Fitz for obedience and water training, exercise, and fun. When rules permit Fitz being off-leash, we take that opportunity to practice recalls, wear out his puppy energy, and to socialize him with other adults, children, and dogs. Honestly, I do not know what we would do without these dog-friendly parks!

Sincerely,

Dr. Wendy R. Altman

Correspondence ID: 4326 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA.

Allowing pet owners to explore our beautiful trails is a right. So long as my dog is well behaved...why would you take that away from me?

My dog is part of my family and has been for 13 years. Restricting my ability to enjoy the beautiful outdoors here with my dog is a shame and unfair. Please, please don't deny me the right to enjoy my town with my ENTIRE family...which includes my dog.

Thank you for listening. Please, reconsider this restriction.

Sincerely, Lisa L Clark

Correspondence ID: 4327 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

This is in regard to the Dog Management Plan/Draft Environmental Impact Statement which outlines proposed rules for dog-walking on GGNRA lands.

The Black Point Environmental Action Committee endorses Alternative D which allows dogs only on-leash and then only on sidewalks, paved roads and some beaches.

Dogs off-leash are seldom controlled and endanger wildlife.

Please protect our endangered wildlife. While, I have two dogs, it is more important to protect wildlife.

Thank you for considering our request.

Sincerely,

Rosalie Webb President

Correspondence ID: 4328 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superior Dean,

Please maintain restrictions on dogs in GGNRA. I walk dailey in the GGNRA + am appalled with the amount of dog shit which is cluttering paths + spoiling the beauty + health of nature. On Oakwood Trail, Blithedale Avenue trails + many others where dogs are allowed, dog owners habitually let do run loose without leashes + leave ugly plastic bags filled with dog shit along the trail so they don't have to carry it. I can think of no practical way to control this except by restricting dogs on these trails.

Thank you for protecting the beauty + health of these trails by forbidding dogs from running loose without responsible supervision.

Sincerely,

Claire Blattin

Correspondence ID: 4329 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Dear Mr. Dean:

I am writing to urge you not to implement the proposed changes to the off-leash areas in the GGNRA. I have lived in San Francisco for fifteen years and have a family including a young child and a three-year-old puppy. We especially love hiking as a family with our dog on Montara Mountain (where we usually only run into a few other people or dogs), as well as Ft. Funston, Crissy Field, Ocean Beach and Muir Beach. We enjoy seeing people of all ages, races, family units, and well-socialized dogs out at these beautiful places. I believe that part of the wonderful charm of San Francisco is the openness and tolerance of the people, which is reflected in how beautifully the dogs play when out in these open park spaces. In over a decade of using these spaces heavily with and without a dog I have not encountered any dog fights in any of them. (The only violence at all that I can think of is hearing on the news that someone was stabbed in the Ft. Funston parking lot, by another person, of course, who was not a dog owner.)

This plan, if implemented, will make the Bay Area less healthy and more dangerous for both people and dogs. Everyone who works with dogs is well familiar with the fact that a dog who is allowed to run and play in open spaces and play and socialize with other dogs is less neurotic and much better behaved than dogs who are left at home or tied up in the yard--those dogs are the ones who become aggressive and hard to control. An excellent example of this is the great behavior of all the dogs who showed up at the protest march on Mar. 21.

Please keep the Bay Area safe and healthy for everyone, and resist these blanket changes that would sabotage something that should be a model for the rest of the state, if not the country.

Thank you for your time.

Sincerely, Rebecca Coolidge

Cc: Sen. Dianne Feinstein, Sen. Barbara Boxer, Congresswoman Nancy Pelosi, Congresswoman Jackie Speier, Secretary Ken Salazar, National Park Service, Sen. Leland Lee, Sen. Mark Leno, Assembly Member Fiona Ma, Assembly Member Tom Amodeo, Mayor Ed Lee, David Campos

Correspondence 4330 **Project:** 11759 **Document:** 38106

ID:

Received: May,23,2011 00:00:00

Correspondence Letter

Type:

Correspondence: I BELIEVE GGNRA SHOULD RESTRICT OFF LEASH DOGS OR REQUIRE ALL DOGS ON LEASH. I HAVE BEEN WALKING AT FORT FUNSTON FOR 30 YEARS. DUE TO THE NUMBER OF DOGS OFF LEASH OR THE LACK OF RESPONSIBLE OWNERS, I AM NO LONGER COMFORTABLE WALKING THERE, ESPECIALLY ON A SATURDAY OR SUNDAY. THE DOGS HAVE TAKEN OVER.

RECENTLY A LARGE DOG JUMPED ME FROM BEHIND AND KNOCKED ME DOWN. MANY TIMES DOGS COME TOWARD ME IN A MENACING WAY AND THE OWNERS OR WALKERS SAY NOTHING OR SAY "THE DOG DOESN'T MEAN IT." A FEW YEARS AGO MY DOG WAS ATTACHED BY ANOTHER OFF-LEASH-DOG AND ENDED UP AT THE VETERINARIAN. THE OWNER HAD NO CONTROL OF THE DOG. RECENTLY, A SMALL DOG JUMPED ON ME AND THE DOG WALKER MADE FUN OF ME WHEN I CORRECTED THE DOG. CALIFORNIA HAS THE LARGEST NUMBER OF LAWSUITS FOR DOG BITES. HOW MANY PEOPLE HAVE TO GET INJURED OR MAYBE EVEN KILLED BEFORE SOME CONTROLS ARE PUT IN PLACE.

PEOPLE SHOULD BE ABLE TO FEEL SAFE TO ENJOY THE AREA FOR FRESH AIR AND EXERCISE. TO GIVE DOG OWNERS A RIGHT THAT TAKES AWAY A RIGHT OF OTHER PEOPLE TO FEEL SAFE IS WRONG. I HAVE GRANDCHILDREN AND NOW WOULD BE AFRAID TO TAKE THEM TO FORT FUNSTON. MANY DOG OWNERS SEE THEIR DOGS AS THEIR CHILDREN BUT FAIL TO TRAIN OR DISCIPLINE. A FEW YEARS AGO SUNNYSIDE PARK, MY LOCAL PARK, WAS OVERRUN WITH DOGS. RESTRICTIONS WERE PUT IN PLACE AND NOW IT IS A PLACE WHERE FAMILIES AND CHILDREN CAN SAFELY PLAY. THERE ARE SO FEW PLACES IN SAN FRANCISCO WHERE PEOPLE AND CHILDREN CAN ENJOY THE OUTDOORS.

THANK YOU FOR YOUR TIME AND CONSIDERATION.

KAREN BRESLIN SAN FRANCISCO, CA 94127

Correspondence ID: 4331 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: RE: Dog policy

Dear Mr. Dean,

Before you make a decision on a dog policy for the GGNRA you need to determine the impact of your preferred policy on the residents of the impacted counties. This is a quality of life issue for thousands of citizens who need to use the GGNRA for both on- leash and off-leash dog exercise.

I want to be able to continue to walk my dog at Fort Funston, Crissy Field and Ocean Beach. His running on the beach and on the approved paths at Fort Funston do no harm to birds and other wild animals.

It is the humans who damage the dunes by walking on them. I think more education and enforcement of current restrictions on humans would be more helpful than banning dogs from these areas. People are ignorant. They need to know.

Also, the parks of San Francisco will be over-run with dogs if we can no longer use GGNRA. Sincerely,

Eve Thompson

cc. Sean Elsbernd Jackie Spear

Correspondence ID: 4332 **Project:** 11759 **Document:** 38106

Received: May,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean, My name is Karen Wing. My husband and I live in the North of the Panhandle (NOPA) neighborhood. We have two medium size dogs. Since we are both retired, we enjoy spending the mornings with them in different areas of the GGNRA.

As responsible dog guardians, we keep our dogs under voice and sight control, clean up after them and keep them out of the fenced dunes and vegetative areas. It is important for us that places like Crissy Field, Presidio, Ocean Beach develop a compatible off leash policy.

I do not agree with the GGNRA's current preferred alternative. It significantly restricts and eliminates off leash dog walking in many areas within the GGNRA, In addition, as presented in the DEIS, the proposed dog management plan eliminates dog-walking (on and off leash) access for all new lands. The GGNRA's mission applies equally to new lands as existing lands. I believe the GGNRA should consider reasonable and balanced alternatives for dog walking on new lands and not just apply restrictions

across the board.

I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options (besides restricting dog-walking access) should be considered first. For example, in Vancouver B.C. they put a restriction of time when dogs and their guardians can have access and use of the water front and beaches. Early morning and early evening times allow for off leash recreation without interfering with children and families who do not want to interact with the dogs. They also clearly identify restricted protected areas.

GGNRA should be a partner with the City of San Francisco and other communities, not an adversary. The DEIS seems to be biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. GGNRA is important for compatible use by everyone. Let's work together and come up with viable solutions that can work for all of us. Sincerely,

Karen Wing

Correspondence ID: 4333 **Project:** 11759 **Document:** 38106

Received: May,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: I have been exercising my dog(s) and my self at Ft. Funston seven days a week since September 1981. During life's low times, it was often the only good part of the day. Being able to walk at a brisk pace, while my dog trots at his pace, has been extremely beneficial to both of us. When dogs are off leash they don't have to defend their owner or themselves, so are less likely to become aggressive.

I understand that the increase in use has made the situation complicated.

Three things would help: Don't block the paved path Don't block the water fountains Pick up two piles of waste per dog. (It is hard to watch all the time)

In almost thirty years, I have seen very few problems. Everyone I talk with considers Ft. Funston to be little bit of heaven. Please consider the social benefits of healthy exercise for people as well as dogs.

Sincerely,

Elizabeth Kunz Daly City, Ca 94015

Correspondence ID: 4334 **Project:** 11759 **Document:** 38106

Received: May,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

I would like to register my opinion of the draft Dog Management Plan and EIS for the GGNRA: As a photographer, I visit Ocean Beach about 50 times per year, where I have observed first-hand the damaging impact of dogs on this area's wildlife and environment. On almost every visit I observe several dog owners allowing their off-leash dogs to run freely through the Snowy Plover protection areas, which are clearly marked as areas closed to dogs. The owners never show the slightest concern, and often allow or encourage their dogs to chase the sea-birds. The dogs also roam freely in the littoral areas the plovers use for nesting, as explained on signs throughout the area. On a few occasions I have politely asked dog-owners to leash their dogs but this is nearly always met with hostility. In all the years I have visited Ocean Beach I have never seen anyone enforce the limitations on dogs. It is obvious that stronger regulations and enforcement are needed.

There are miles of shoreline where leashed dogs are permitted, but many dog owners obviously feel they should be able to take their dogs anywhere, unleashed, despite endangered species, laws, and the rights of others who want to enjoy GGNRA lands without interacting with domestic animals. If we must have "off-leash areas" they should be fenced off to protect people, dogs, and habitat. I also agree with those asking for full compliance and a ban on commercial dog-walking.

I know dog-owners are a vociferously organized group. They threaten mass demonstrations to "show us what it will be like" if their animals are banned from a few public areas. You have surely received many letters from them. I hope you will consider the rights and concerns of those of us who are not part of some organized pressure group, but care about the GGNRA and its mandate to protect wildlife. Non dog-owners deserve recreational opportunities at least as much as the small minority of visitors who choose to bring their domesticated animals onto our wonderful GGNRA lands.

Thank you for your attention,

Jonathan Clark

Correspondence ID: 4335 **Project:** 11759 **Document:** 38106

Received: May,23,2011 00:00:00
Correspondence Letter
Type:
Correspondence: Mr. Dean,

I am very distressed to hear about the GGNRA plans to severely limit off leash dog walking in areas that have been approved for over 30 years. This has been an integral part of the urban environment here in San Francisco and to curtail it, as you propose, would have a significant impact on the community, probably unimaginable by the bureaucracy headquartered three thousand miles away who I suspect is putting you under pressure to get this done. The compliance based management strategy also proposed is making the situation scarier for our community.

I have not heard any rational reasons for changing this long running policy so I assume it is being pushed by the ego of those in charge of the organization from afar who want to control all aspects of their kingdom. However, I realize that I am not in this business and can very well be missing some very good points as to why the policy should be radically changed. Consequently, I look forward to a call from you to discuss those points. I can be reached at.

Talk to you soon, Jack Bernard San Francisco, Ca. 94123

Correspondence ID: 4336 **Project:** 11759 **Document:** 38106

Received: May,19,2011 00:00:00
Correspondence Letter
Type:
Correspondence: Dear Sup. Dean,

In the DEIS, there is very scant reference to RECREATIONAL uses. We know that recreation was a major priority in the creation of the GGNRA. GGNRA was established for urban environment of the SF Bay Area. The DEIS however does not address a very crucial component: human recreational environment.

Please respond to this point. The DEIS is flawed, one sided and ridiculously verbose.

Sincerely,

Chris Moscone

cc: Congresswoman Nancy Pelosi Sen. Barbara Boxer Sen. Diane Feinstein
Dept of Interior Secty. Ken Salazar Congresswoman Lynn Woolsey Sen.

Mark Leno Assemblyman Jared Huffman

Correspondence ID: 4337 **Project:** 11759 **Document:** 38106

Received: May,19,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am a mother of two small children and I live in the Marina district. I have looked at the GGNRA dog management plan and I am very concerned about the part pertaining to Crissy Field. The dogs run around, some are aggressive. I don't feel safe with my children on the beach or on the walkway.

I think that it is the duty of GGRNA to protect the safety and well being of people over the needs of dog owners in a place where there are so many people using the Park. In particular, there is a duty towards those who are vulnerable like children and the elderly.

I do not think that is right to allow dogs to run free on the beach nor should they be allowed on the central path. I recommend that you fence in a portion of the meadow ' airfield and allow that to be used by dogs.

Please re-consider the draft plan. It does not protect the most vulnerable people in a heavily used Park.

Thank you,

Mary Gordon

Correspondence ID: 4338 **Project:** 11759 **Document:** 38106

Received: May,20,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

Please ensure that in your management decisions you do all that is necessary to protect the park's natural resources and visitor experience from disturbance from off-leash dogs. I strongly urge you to insist that dog walkers keep their dogs on a 6 foot leash and to collect dog feces while visiting this special national park land.

I oppose any off leash dog areas within the park's legislative boundary.

Sincerely,

Jim Milestone P.O. Box 61 Whiskeytown CA 96095

Correspondence ID: 4339 **Project:** 11759 **Document:** 38106
Received: May,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: GGNRA,

On this same day, after I had just deposited the first letter to you about dog encounters, I was nipped on the arm by a black laborador as I was walking on Pacifica's ocean front promenade. The dog was on leash and the owner who was holding the leash looked surprised that her dog had done that. She asked if the dog had bit me, as I was holding my arm and looking at the slobber on my jacket sieve. I said yes , and I told her she should short leash her dog. When I walk I swing my arms normally and not excessively.

I know how quickly these things happen because it happened with me and my dog on leash. It is a matter of police report that my dog bit a young person on the hand while he was passing on a skate board. We were on a four foot wide concrete side walk and my dog reacted to a hand swinging by and caught it. What I learned from that is that is from then on I had to anticipate and move my dog to the outside position and not have him in between moving people. So when you develop the rules about dogs being on leash ,you should also have suggested etiquette like place yourself between your dog and other people. Also when in tight quarters grab the leash to shorten it so that your dog is near you.

In my opinion reel leashes give the dog owner almost no positive control and they often stretch out across entire walkway or bike paths and frequently wrap around flustered reel holders legs. The best development is the muzzle leash which turns the dog's head.

As I continued my walk over the hilt of Mori Point GGNRA this day, I came upon another woman and her black laborador. This dog was off leash. The owner had the leash looped around her hand. It seems to be common mind-set to have the dog off leash if no official is looking . So please enforce the rules with monetary penalties. I'm sure that the word will get around.

Yes I want all dogs on leash every where except on private property and dedicated dog parks.

You may publish any of my comments.

Sincerely, John Meria

Correspondence ID: 4340 **Project:** 11759 **Document:** 38106
Received: May,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 16, 2011

Dear Frank,

I am a responsible dog owner. I clean up after my dog. When I'm on my walks, I also clean up after other dogs and people who have left trash. I only allow my dog to go in areas where he is allowed to be off leash, and when he is, I keep him under voice control.

I am asking you not to change the current off leash laws we all enjoy with our dogs. Changing the current off leash laws would not only affect all of the dogs in this area, but also their owners. What follows is my story, my reasoning, for feeling so passionately about this as I do:

I had no idea how much Ozzie, our Irish Terrier, would improve my life.

As an artist who gets her inspiration from nature, I now begin every morning with a walk with Ozzie in one of the many beautiful, natural places in San Francisco where he can run off leash, We LOVE starting the day like this. Before Oz became part of our family, I rarely went to these places. Because of him, both my art and the quality of my life have been tremendously affected.

Watching Ozzie run free in our off leash parks honestly brings me as much happiness as it does him. Its hard to describe how much joy I'm filled with when I see Oz running down the hills of Fort Funston or on the grass of Crissy Field, with a huge smile on his face, knowing that he's just minutes away from jumping into the ocean. Its the same feeling I get when I watch my 9 year old son, Milo, do the same. I can imagine leashing Milo about as much as I can leashing Ozzie. It would not only rob them of their freedom and joy, but it would also rob me of the delight I get from watching them.

When we first got Ozzie, we took him to enclosed dog parks. He was a year old and we weren't sure how strong his recall was. We soon stopped taking him to these parks when we realized how aggressive dogs became when they were enclosed. I actually wound up with a herniated disc after I had to pull Ozzie away from a dog who was attacking him, which prevented me

from working, and walking him, for months. If you are to impose leash laws, these parks will become even more crowded than they already are.

On leash, Ozzie feels as though he needs to protect us. This makes him occasionally act aggressively toward passing dogs, and is the complete opposite of how playful he is when he's off leash. When Ozzie's on leash it's not a relaxing experience for either of us. He also doesn't get nearly the amount of exercise he needs. Our veterinarian recommends 4 miles a day, which he definitely gets when he's off leash.

I seriously hope we can continue to let our dogs run off leash. I would be more than happy to work with you on a solution that would benefit everyone involved in this issue. I feel incredibly fortunate to live in dog-friendly San Francisco where we have so many beautiful places to let our dogs roam free in nature. This has become such an important part of my everyday life that I can't imagine moving to, or living in, a city where this wouldn't be possible. Please don't take this away from me, Ozzie, and all the other dogs and dog owners whose lives have been immeasurably improved.

With hope and sincerity,

Carrie

Correspondence ID: 4341 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: To Whom It May Concern:

I would like to express my support for the maintenance of the off-leash status in The Golden Gate National Recreation Area.

I'm not familiar with all the intricacies of this specific case, but in general I have always maintained that it is best to work with Mother Nature, not against her. The need for outdoor stimulation is crucial to both humans and canines. It can help reduce the stresses of everyday life and act as a therapeutic release, not to mention, encourage joint exercise and bonding between owner and dog, Dog parks also act as a positive community setting, bringing fellow dog owners together into a pack of their own.

Overall, I think we need to reflect on how we choose to treat our animals. San Francisco is at the forefront of the animal friendly movement and keeping this park area fully open would be an important step in maintaining that tradition. I would encourage that other potential solutions and remedies be considered before the pending changes are made. In order to create a

more balanced society, I think we should start respecting our animals and their spaces as we would our fellow humans.

"The greatness of a nation and its moral progress can be judged by the way its animals are treated." -Mahatma Gandhi

Thank you for your time.

Sincerely,

Cesar Millan

Correspondence ID: 4342 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

I am writing in opposition to the GGNRA's draft dog management plan.

The loss of these areas to Bay Area dog-owners would be a heavy and unnecessary blow to opportunities for recreation and enjoyment. The GGNRA was meant to be an urban recreation area. It has accommodated and can (and should) continue to accommodate both recreation and conservation. I have gone walking with my dogs (on leash where specified) in the areas around Pacifica, and have observed no problems occasioned by the use of those areas by people walking their dogs. The draft plan provides no evidence to support such arbitrary and draconian changes to policies that have worked well for 40 years.

I request The Park Service to revise the dog management plan to include dog walking on GGNRA trails and lands, particularly in San Mateo County.

Thank you for your consideration.

Very truly yours,

Linda Rorem Pacifica, CA 94044

Correspondence ID: 4343 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My family has a new six month old puppy (small breed). We try to be responsible dog owners. Our dog is going to training classes in which our whole family participates. We keep our dog on a leash for her safety and well-being, and for the sake of other dogs and people (especially small children) she encounters. When she gets older, if we feel her behavior is predictable, we may want to let her off leash. We are glad of the possibility that in the future there will be some places for her to play off leash, as proposed in the current plan.

We often go to Crissy Field in the GGNRA. I have often noticed that not everyone else seems to keep their dog under adequate control. I think that if the Dog Management Plan is to be successful, there will have to be strict enforcement of the regulations that are finally adopted. Some people will not obey the rules unless they see that those who do not adhere to the restrictions are actually confronted and brought under compliance . Therefore, I urge you to try for a high level of adherence to the rules.

If licensing dogs will help the GGNRA achieve a high level of attention to the rules and restrictions, then. I urge you to develop a licensing program with the city. I think licensing could also help with the problem of stray or injured dogs. We want to make sure these animals get back to their loving homes quickly and safely.

Sincerely,

Sharon C. Meyer, M.D.

Correspondence ID: 4344 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: GGNRA PUBLIC COMMENT WORKSHEET

Describe how you use the GGNRA and how you benefit from recreating there with dogs (which areas do you go to, how often, what do you get out the experience?)

My 13 year old dog and I have been hiking in the GGNRA sinc 1996. I enjoy a good, healthy nature walk at Fort Funston and Crissy Field with my dog and other dog owners that have become friends over years. People and dogs are both mammals and require for their physical and mental well being to be part of our natural environment. Open spaces provide enough land to avoid confrontations, share use with other interest groups, and get a good workout. Meeting interesting people, this is perfect for the NPS "healthy

people health parks" initiative.

What parts of the DEIS do you disagree with/want to challenge?

The government position offers no empirical data to support any existing predatory relationship between canines and the birds. The two species exist on different levels and do not compete for the same space or resources. Arguably, dogs actually scare away the natural predators of birds, including feral cats. I have never personally witnessed any hunted, harassed, or dead birds in my 15 years.

Comment on the benefits of commercial dog walking to SF residents and dogs, and the lack of documentation that commercial dog walkers and the dogs they walk harm the GGNRA environment (wildlife, plants, other recreational users).

Dogs are the second best crime fighters. We can't have the police in every park, all the time when professional dog walkers are excluded from parks, the resulting vacuum will be filled with hoodlums, gangs, drug dealers, homeless, and other undesirables.

Describe what you want (what changes you want in the plan; what alternative do you support- and it doesn't have to be one of the alternatives offered by the GGNRA)

Maintain the 1979 Pet Policy supporting recreational use in the GGNRA and support new off leash areas in expanding GGNRA in San Francisco, San Mateo, and Marin Counties. Maintain the current 1% of GGNRA territories open to off-leash walks, and support adding more space as our population grows. No "Compliance based management!"

John Chirico -small business owner -taxpayer -dog advocate

Correspondence ID: 4345 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

I write in strong support of Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo County). I strongly oppose those elements of the Draft Dog Management Plan/Draft Environmental Impact Statement and its "preferred plan" that would eliminate off-leash dog areas at Ocean Beach, Crissy Field,

Fort Funston, and the related areas. Now nearing retirement age, I am a life-long outdoor enthusiast and have been a member of the Sierra Club and various other outdoor activity and conservation/wildlife groups for all my adult life. The last 25 years-plus have been lived in the Bay Area

The GGNRA has a solemn regional trust, that will only be fulfilled if it respects and accommodates the grand diversity and tolerance that is a hallmark of the San Francisco Bay Area. This includes respect and accommodation for people of all ages and walks of life and cultures that come together here.

GGNRA policy has included for a very long time, respect and accommodation for people and their beloved dogs to play off-leash in a number of areas, that my extended family and friends have enjoyed along with countless thousands of others over the years. This is an important part of a healthy lifestyle for families and their dogs, for the dogs really are part of these families. We frequently visit Fort Funston/Crissy Field/Ocean Beach areas with our dog, and meet other family and friends there with their dogs, which is a wonderful healthy form of recreation for all of us.

While I do indeed support wildlife and habitat conservation, there also absolutely must be conservation of sufficient habitat for dogs and their people to play off-leash. Multi-use open space that includes off-leash dog walking is compatible and sustainable with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA. The EIR "preferred plan" simply fails to conserve sufficient habitat for the dogs to play off-leash, the additional restrictions proposed lack common sense or factual support, and ignore the GGNRA mandate to truly serve the wide-ranging Bay Area community.

All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement the National Park Service inappropriately singles out dogs. Its conclusions are not based upon sound science nor long-term monitoring of site-specific conditions. Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

Respectfully,

Marie C. Blits Lafayette, CA 94549

cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of

Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Crissy Field Dog Group

Correspondence ID: 4346 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely,

Kristine Wedum

Correspondence ID: 4347 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

Thank you for this opportunity to share my concerns about the proposed new dog regulations at the Golden Gate National Recreation Area (GGNRA) and the consequences of these regulations on San Francisco's low-income disabled and senior dog owners.

The AIDS epidemic devastated the Bay Area during the 1980's, taking thousands of lives and forever changing our community. It was during that period that the San Francisco Model, a diverse coalition of community based organizations created to provide comprehensive care for people living with AIDS, taught the world the true meaning of "San Francisco Values." Pets Are Wonderful Support (PAWS), an organization that advocates for the healing power of the human- animal bond and provides practical and emotional support services so people can keep the unconditional love of their pets in their lives, was established during this period.

Today PAWS is a thriving organization that owns its own building in the Mission and serves over 750 low-income, disabled and senior pet owners with a variety of practical and emotional support services. Over half of our clients are living with HIV/AIDS. In addition, we are nationally recognized for our work to insure public policy supports the psychological and physical

health benefits of the human-animal bond.

As we approach the 30th anniversary of AIDS in our lives, many people living with HIV in San Francisco find themselves facing new threats at the hands of the National Park Service and the proposed alternative as outlined in the Draft Environmental Impact Statement (DEIS) and the draft dog management plan. If implemented, this proposed alternative would severely restrict off leash dog walking in the GGNRA area and, in effect, reduce access for our disabled and senior neighbors who need safe, easily accessible areas to allow their beloved pets and support animals to exercise and run off leash. I remain deeply concerned that PAWS clients, some of our community's most vulnerable members, are being left out of this discussion. On behalf of our clients, and their canine companions who provided healing, hope and unconditional love, I am asking that the National Park Service address our concerns about the underlying assumptions behind the proposed alternative.

For example, the Crissy Field Dog Group retained an environmental consultant and an environmental attorney to conduct an independent review of the GGNRA's DEIS. The result of this analysis found that the report contains underlying assumptions that are undocumented by data and rely on stereotypes of dog behavior that are not based in fact. For decades dog owners have worked diligently to self police, model good canine citizenship, and have cherished their access to the small portion of the GGNRA (less than 1% of the overall area) that has been made available since the 1979 Pet Policy went into effect.

In an urban recreation area surrounding a community as diverse as San Francisco, environmental concerns and recreation access are not mutually exclusive. At the end of the day, the 1979 Pet Policy is still working ' protecting the environment and our citizens' rights to enjoy recreational activities in one of our country's most unique natural landscapes. It's important to understand that dog owners are not asking for increased access, only a reasonable request to maintain the access rights all of us currently enjoy.

As a dog owner and citizen of the Bay Area, I ask you to please take an active role in protecting my already limited right to access the GGNRA with my cherished dogs and to provide them the opportunity to run off leash, stay fit, and keep myself healthy in the process. As the president of PAWS, I ask you to consider the impact these proposed regulations would have on our low- income disabled and senior clients. Thirty years into the AIDS epidemic, the San Francisco model is evolving, but our San Francisco Values remain as strong as ever. John L. Lipp, President/CEO Pets Are Wonderful Support

Correspondence ID: 4348 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely,

Christine Pirzadeh

We love and take good care of our dog! We clean up after him. We take Lucky hiking every weekend. Please don't take our parks away!

Correspondence ID: 4349 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely, Beth Martin

Correspondence ID: 4350 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

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I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely,

Robin Niemeier Liese Niemeier - 3rd grade I have a nice doggy!

Correspondence ID: 4351 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay

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We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely,

Ben

Go dogs Ben 2nd grade

Correspondence ID: 4352 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

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I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely,

Payton

Dogs are better than you!! I'm in third year

Correspondence ID: 4353 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

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Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely,

Nate

Dogs are better than you Think about the por dogs 3rd grade

Correspondence ID: 4354 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Amy Meyer San Francisco, CA 94121

GGNRA PROPOSED DOG MANAGEMENT POLICY' A PERSONAL REVIEW I am going to state first my only fundamental disagreement with this NPS document. While I am pleased with the wholehearted efforts, and in general the results achieved by NPS staff and citizens who reviewed thoroughly the management of dogs in the Golden Gate National Recreation Area, it is presented in a context that is profoundly wrong. In Volume I, on page i the following appears:

PURPOSE OF GOLDEN GATE NATIONAL RECREATION AREA The purpose of GGNRA is to offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic, and recreational values.

The purposes of the GGNRA are clearly stated in the enabling clause of its legislation, P.L. 92-589: "...to preserve for public use and enjoyment certain areas... possessing outstanding natural, historic, scenic, and recreational values... the Golden Gate National Recreation Area...is hereby established. In the management of the recreation area the Secretary of the Interior... shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this Act, the Secretary shall preserve the recreation area, as far as possible in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area."

I helped develop the legislation that established the GGNRA. It came into existence with a movement "to bring parks to the people where the people are," and yes, one of its objectives of this movement was to give the Bay Area's urban population (and a few other urban areas in other parts of the country as well) a chance to experience a national park close to home - the

key being a national park experience, not a city or county park experience. However, visitors come from all over the United States and all over the world to this park. It is not a local park and cannot be administered as if it were. Briefly, it was suggested before the legislation passed that it be called the Golden Gate Urban National Recreation Area, but Congressman Phillip Burton quickly pushed away that idea. Almost none of the GGNRA is urban. Our park at the Golden Gate protects a national icon and is rich in natural areas and a wide variety of ecosystems. The park also is home to one of the largest numbers of endangered species in the national park system.

The GGNRA is a national park in an urban area. It has to be administered to achieve the goals of its legislation. That includes managing it in the same way as all of the other 393 units of the national park system are managed. What is being offered here is a unique attempt to give a portion of the local population a chance to use the park in a way it has enjoyed for many years. This accommodation can be successful only if it does not diminish the values for which the park was established.

I have personally re-visited several areas of the park with which I am most familiar to see how they are being used by the general public, especially by those members of the public who bring dogs to the park. Most of all, I want the park to administer its lands so that wildlife and the habitat upon which wildlife depends are protected. In general, I am much in favor of having dogs able to be off-leash in areas traditionally used for this purpose' as long as their owners can control them and habitat and wildlife are only minimally affected. However, visitors, both local and those from far away who do not want to share their park visit with dogs, should have opportunities to have equivalent experiences in places of similar natural and scenic value. The park is big enough for that. Any changes in the national regulation' which permits only dogs on leash where they are allowed at all' must be done with the protection of the natural resources, and with the experiences and safety of all visitors in mind. I reviewed the proposed regulations for licensing dogs and for permits for commercial dog walkers. I watched group dog walkers at several sites and agree that a maximum of 6 dogs is the most that should be allowed under a permit. Those who try to walk more dogs more often have insufficient control over some of them. Dogs who come to the park should be licensed. It will take further thinking to figure out how NPS can enforce that requirement in this park when some people bring in dogs from outside this region.

Here is my view of the areas of the park I know best that are proposed to have leashed and unleashed dogs as an accommodation to the wishes of many local people:

LANDS END/FORT MILEY

I favor Alternative D for this area. It has steep topography with narrow trail corridors in most places. It is appropriate to have dogs on leash on the Coastal Trail so that all visitors may have a good experience. The people who use the widest portion of this trail between Pt. Lobos Avenue and the end of the improved area are often older, disabled, or appear to be visitors from other countries. The El Camino del Mar Trail up to the steps has little space for dogs to run off on either side owing to density of habitat and steep topography. It seems appropriate for a regulated off-leash area (ROLA).

I prefer Alternative D because it also allows dogs off-leash in the very narrow strip of land between the golf course fence and the drop-off to the bunkers.

Oddly, some trails are not shown on the maps, including one that connects the golf course fence line trail with the E. Ft. Miley picnic tables and one that continues the El Camino del Mar Trail past the steps to the parking lot behind the Legion of Honor. These areas have many opportunities for dogs to go off-trail into habitat areas. They should be on-leash areas. It should also be noted that the end of the fence line trail does not connect directly with the Legion of Honor parking lot and there is probably a 50' elevation difference between them. Walkers who try to connect in this area will be on San Francisco RPD land some of the time. Dogs should be on leash in all of these areas because of cars and museum visitors.

OCEAN BEACH

I am in favor of the GGNRA's Preferred Alternative for Ocean Beach with one addition. I have inquired as to why the regulated off-leash area (ROLA) ends at Stairwell 21 and have been told the stairwell marks a buffer zone for the protected area for the snowy plover directly to the south. However, I think this is drawing a line in the sand which is hard to patrol and is more likely to be disrespected. It would be more sensible to make the ROLA/snowy plover boundary at the south end of the esplanade, where dogs can go on leash onto the trail that goes toward the zoo. This is only several hundred feet of distance. It gives better continuity and still leaves a buffer zone for the birds.

FORT FUNSTON

The fort has a large number of people who have used it for dog walking and sociability for many years. It is severely eroded in large places. Watching dogs run and chase balls and sticks I see them move from denuded areas into areas which have been or could be rehabilitated for habitat, rather than given over to sand and ice-plant. Post and rail (coated wire) fencing such as is used on Milagra Ridge and Crissy Field is needed here, both to keep dogs out of vegetated or re-vegetating habitat and to give people and dogs a

definite place to be or a clear path along which to move. Such fencing does not have to dominate the landscape. I favor Alternative D which provides an upland area for the dogs and also a part of the beach as shown on the maps. There should be a connecting ROLA path between the upland and the beach, fenced as necessary to keep animals and people out of habitat. CRISSY FIELD, east, west, and central

The most uncaring, self-centered dog owners I have encountered walk on the Golden Gate Promenade. Many of them do not keep their dogs under voice control so that others can walk without being bothered. My grandson froze against my leg several times in the course of the three Tuesday mornings we were there, (I have not tried the area on a weekend or holiday.) My instinctive reaction is to suggest that the Promenade is no place for unleashed dogs because it is too narrow and because of the attitude of the dog owners. Also, I think the Promenade with its splendid views of the Golden Gate is an area that should welcome visitors from outside San Francisco, and I don't think it does at this time.

The dogs and their owners seem to do better along the beach, probably because the dogs have room to roam and seem to be more interested in the other dogs they meet and the balls or sticks their owners are throwing. However, the owners also seem to be more aware and respectful of other people on the beach that their dogs move to encounter and to call them off. My grandson may also feel he has more room to avoid them.

There are certain areas along the beach favored by the commercial dog walkers' two or three may congregate together. There may be 12 - 18 dogs at a time in one place. In general, these dog walkers seem to keep relatively good control over their dogs. Not having a dog with me, I don't really know how these small packs of dogs relate to single animals coming down the beach but I have not seen any incidents.

Therefore, I support maximum leash restrictions on the Promenade, while favoring a broad area for off-leash on the beach, consonant with wildlife protection. I haven't been able to observe the interactions of dogs with people on the former airfield.

Having written the above, I checked the Plan maps and find I support the Preferred Alternative. An additional note: A friend told me that she and her husband unwittingly wandered into the wildlife protection area on the beach side because the signage was not clear enough on that side so that they didn't realize they had entered it. If this has not been mentioned before, I hope someone will check this out at both high and low tide to make sure the signage is very observable along the beach.

MILAGRA RIDGE

This area has wonderful views and its scenery has a wild aspect. Its many different species of wildflowers contribute to that scene and I understand there is much wildlife. I was impressed with the protective post-and-rail (wire) fencing of sensitive areas; it did not dominate the scene but it would keep dogs and people out of habitat.

I was shown the transects of the people who do butterfly studies in the area, and was told of the many volunteers who work to keep out the exotics and help with restoration of degraded areas. All the dogs I saw on a sunny Sunday afternoon were leashed. I agree that anyone walking more than 3 dogs along the proposed trail, even on leashes, could affect the habitat and wildlife.

I think the Preferred Alternative is the right choice for Milagra Ridge. It has areas both for leashed dogs and for people who do not wish to be with dogs. Although I noted there previously have been citations for dogs off leash, I think this is a place where community cooperation and compliance could be fostered.

MORI POINT

On a Sunday morning with changeable weather there were fewer people on Mori Point than I have seen on previous weekday and Saturday visits. I saw the great progress in native plant restoration and trails since my most recent visit last fall. Mori Point is a poster child for the encouragement of park stakeholders through community activism. Many of the plantings on Old Mori Road are obviously just taking hold. There is some fencing but many of those plantings and the natural areas behind them as well as the ponds cannot be well protected from off-leash dogs.

When I paid a subsequent visit on a sunny Sunday afternoon, the situation was about the same except that there were more people and dogs. In general, the people with dogs paid attention to the behavior of their animals. I saw only small incursions into habitat. But I think dogs have to be leashed along Old Mori Road.

About half the dogs I saw were on leash. It is evident why they should be on leash on the Old Mori Road and the Coastal Trail and why they particularly should not be allowed on the Headlands Trail which is already beaten down just by human visitors. In the Preferred Alternative three trail segments have no dogs which should provide a good alternative experience for those who do not wish to encounter them.

I endorse the Preferred Alternative.

RODEO BEACH

There were relatively few people with dogs on the beach on a weekday morning. Several classes of elementary school children were there, probably from the Headlands Institute (NatureBridge). There was plenty of room for everyone who was there, and if there were a lot more people there, I think there would still be a lot of room. I favor the Preferred Alternative, which gives plenty of room for dogs off leash, but also allows some beach that is dog-free for picnickers and beach games.

CONCLUSION

I think there will be a continuing need for Education for some time to come concerning the status of the GGNRA as a national park. When I went with Howard Levitt to a neighborhood meeting, a man who said he is retired and loves to be out with his dog at Fort Funston said (paraphrased!) that he did not understand why the habitat could not be fenced so he could play with his dog wherever else he wanted to go. This lack of awareness of the special nature of a national park has unfortunately spread throughout the community during the 30+ years that dogs have been allowed off-leash, most of all in the last 10 years.

It is going to take a concentrated effort to educate, backed by an insistence on Compliance and provision of Enforcement to make this special rule work. Frankly, a 75% compliance is viewed as a "C+" grade. I think it is too low, because too many people in the most contentious places, especially Crissy Field but also Fort Funston, will see too many dog owners getting away with too much. The rule has to expect a higher level of compliance' like 90%' because there has to be a critical mass of acceptance of the terms of the Special Rule for it to work. Amy Meyer May 20, 2011

Correspondence ID: 4355 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are

only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, BH DiFrank

Correspondence ID: 4356 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: San Francisco, CA 94127 May 18, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Mgmt Plan/Draft Environmental Impact Statement

Dear Superintendent Dean:

I recently moved to San Francisco from the East Coast with my family and two dogs, and have to say, the best thing about San Francisco has been the off-leash parks. I am very much opposed to the DEIS, as it reduces the off-leash areas to such an extent as to ruin the beneficial aspects to dogs and dog guardians.

I take my dogs to Ft. Funston ("FF") every day'sometimes twice a day, and we love it. I am also a nature lover, and a member of the National Wildlife Federation. Every day I go to FF, I see hundreds of examples of people and dogs joyfully co-existing with nature and using the environment the way it is intended. I see responsible dog guardians, who closely monitor and control their dogs, pick up dog waste, and even volunteer to come monthly to clean up the park. Do you see how committed we are to keeping our parks

off- leash?

Allowing dogs to romp off-leash, but under voice control of responsible guardians, provides essential exercise, community camaraderie, and joy. Adequate exercise actually reduces aggression in dogs. When they are off-leash, they quickly resolve any hierarchy issues amongst themselves with their body language, whereas while on-leash, many dogs become territorial and aggressive. I have witnessed this many times with my dogs and others. It is simply not the same experience to walk dogs on-leash. In fact, it actually becomes more stressful and much less appealing to all.

In an urban area such as San Francisco, we need the parks to allow us adequate recreation. With the multitude of dog households in this area, taking away our off-leash parks would mean pushing hundreds of dogs into already crowded city parks. This increases conflict, aggression, trash, traffic, and all the attendant over-crowding ill effects. I do not believe the GGNRA has studied or documented this potential negative impact. I have attended hearings, meetings, marches, and read the DEIS in order to educate myself about why you want to make such a devastating change to our community. You may have heard of isolated problem incidents, but surely those problems could be addressed in a less draconian manner.

Setting aside certain sections of the beaches for certain activities, fencing, signage, educating the public, and enforcement of the rules would better serve the community as a whole, and enable your organization to fulfill its responsibilities. Engage the dog loving community in enforcing the rules in our existing off-leash areas, in exchange for continuing to allow dogs off-leash. We are a responsible and motivated group!

Most dog lovers are nature lovers too, and the vast majority would want to cooperate with a measure that is designed to balance all interests. The majority should not be punished for the actions of a minority. Don't forget: dogs were once wildlife too until humans domesticated them and made them dependent on us. We therefore owe them doubly to take care of their needs.

Please don't restrict our off-leash areas as you contemplate. I personally pledge my cooperation in enforcing rules to allow better co-existence if you will refrain from changing our existing off-leash areas.

Thank you for your consideration.

Jaye W. Schissel

The Honorable Nancy Pelosi U.S. House of Representatives 235 Cannon
House Office Building Washington, DC 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street, N.W.
Washington, DC 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W.
Washington, DC 20240

Correspondence ID: 4357 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely Marin-Assistant Manager

As a property manager of a community that allows pets, I find this GGNRA Dog Management Plan a bad thing. Our pets are part of our families, and we should respect them as that.

Correspondence ID: 4358 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: San Francisco, CA 94127 May 19, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Mgmt Plan/DEIS Dear Superintendent Dean:

My family and I live in St. Francis Wood, and take our dogs to Fort Funston 5-8 times a week. We are very opposed to the above-referenced plan for the following reasons, and urge you to take a more collaborative, balanced approach to addressing problems with the existing situation.

We are also concerned about the preservation of the parks' natural resources, but more balanced and reasonable options exist besides restricting dog-walking access. It is not even clear at Ft. Funston where dogs are not allowed. Better signage and the creation of environmental barriers would be a solution that could protect wildlife and vegetation, yet allow dogs off leash

and their guardians to use the park.

In fact, dogs and their guardians are best-suited to maximize the beneficial usage of these parks. Look at how many of them currently use these parks daily, the overwhelming majority of whom do so in peaceful, happy co,existence! Every situation is going to have its attendant problems, and there will always be a minority of people who don't take responsibility for their actions. But that does not justify taking away an environment that is so well-suited for so many responsible users.

The DEIS treats the environment and recreation as being at odds. We are not destroying the environment---we are using and enjoying it the way it ought to be. I wish the GGNRA would consider enlisting the help of dog loving park visitors, in exchange for keeping the parks off leash. Take a collaborative approach to solving the problems that exist. This would be an ideal way for the Authority and the community to come together to maintain our resources for the benefit of all. We appreciate that you have a difficult job trying to balance seemingly competing interests. But the best approach to conflict resolution is to find common ground among the parties as a starting point to solving problem in a way we can all live with.

Thank you for your consideration of our concerns.

Sincerely, John A. Schissel

The Honorable Nancy Pelosi U.S. House of Representatives 235 Cannon House Office Building Washington, DC 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street, N.W. Washington, DC 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W. Washington, DC 20240

Correspondence ID: 4359 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely, Susan Doyle

Correspondence ID: 4360 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

The GGNRA draft dog management impact statements are not fact-based and do not address the health or well-being of people, dogs or the community. The GGNRA can accommodate both recreation and conservation. Regulations for Yosemite and Yellowstone are not appropriate for an urban recreation area and the courts have upheld the existing 1979 pet policy. The plan minimizes the one in three households in America with dogs; this plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and more.

I oppose the GGNRA draft management plan and all DEIS alternatives presented because the plan does not provide evidence of impacts that justify such drastic changes to 40 years of healthy dog recreation. The revised dog management plan needs to:

? Rigorously and fairly evaluate the benefits of dog recreation on the health, safety, and well-being of people, the community, tourists with dogs, and dogs

? Remove all speculative, exaggerated, and misleading statements and measure the actual beneficial and adverse impact of dog recreation on each site

? Provide site-specific need for action justifications and dismissals of suggested alternatives; use objective standards that would apply to any recreational activities such as equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.

? Remove any rules that allow for the reduction or elimination of dog recreation based on law enforcement violations (e.g., banning dogs because of 25% non-compliance with leash laws)

? Retain and formalize the existing GGNRA dog policy (aka the 1979 Pet Policy) and provide for balanced off-leash areas in San Mateo County and new lands

? Provide awareness programs, safety measures (e.g., signage, preventatives for cliff falls, barriers, etc.), land use measurements, and other measures to

address any valid adverse impacts from any recreational activity

? Align commercial dog walking rules with county or city regulations

My conclusions are supported by:

My family and I have made it a standard weekend outing to walk at Fort Funston. We have done this at least once or twice a week since our now 14 year old dog was born. She and her brother love it there. When Maddy turned 5 we added Seamus to the family. He is a standard poodle who has been walked by us or our walker every day at Fort Funston for nearly nine years.

We are careful and respectful of nature, and of the many others we share this beautiful space with - dogs, elderly, young, and everyone in-between. In all this time, we have witnessed a handful of situations where people have been careless. Yes, we need to take care of this incredible urban resource. But no, we do not need to so over restrict it's use tht we lose the unique urban/outdoor mixed use feel that a City like SF is built around. We all live here together. Let's try to do it well.

Correspondence ID: 4361 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely, Jana Cranmer

Correspondence ID: 4362 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely, Kim Daniel

Correspondence ID: 4363 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: May 22, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

RE: Draft Dog Management Plan, Draft Environmental Impact Statement

Dear Superintendent Dean,

I have been a resident of San Francisco since 1977 and have lived in Bernal Heights almost all of that time. I am now 62 years old. Prior to owning a dog, I was afraid to walk in nature by myself. When I was finally able to get a dog, I delighted in taking her to Fort Funston, where she could get her needed off-leash exercise, and I could socialize with other dog lovers, all in an exquisite natural setting. It was an eye opener to me to see so many women alone with their dogs, and feeling safe.

My dog died over a year ago, and I still go to Fort Funston regularly because I enjoy being around dogs, and because it is a safe for me to go. In fact, I feel more freedom there as an 'older' woman than I ever did in my younger years. The reason for this is that the dog-owning community has made Fort Funston a vibrant, well used, well cared for gathering place. And it affects not just dog owners, but also families with children, frail and elderly people, and people who are not able to own a dog.. All of those populations feel safe, and many have told me they come so either they or their children can be around dogs.

In more recent years I have noticed the same thing at Crissy Field and Mori Point. It's wonderful to see people of all ages, abilities, and backgrounds come together to enjoy the best San Francisco has to offer. In fact, as a white female, the most opportunity I get to interact with people of other ethnicities is around their dogs. So often our dogs serve as the catalyst for conversations, giving us a feeling of community.

The draft Dog Management Plan and Environmental Impact Statement disturbs me for several reasons. The Golden Gate National Recreation Area is supposed to provide recreation for its urban residents, yet the report proposes to treat it like Yosemite or Yellowstone National Park. It views recreation as detrimental to the environment, yet people ARE the environment of a city. People need exercise, nature, beauty, and

socialization. Dogs need exercise as well as exposure to people and to other dogs.

The number of dogs in San Francisco, and the need for dogs to get regular exercise, means that if the GGNRA areas are closed or severely limited to off leash dogs under voice control, the impact on the city parks will be profound. The study did not assess the impact on city parks. Nor did it conduct surveys on this impact.

The study itself shows that only 2% of serious safety incidents involve dogs. Yet it claims that dogs present a serious risk. And it never even considers comparing this 2% with the numbers of women who would be accosted if they did not have dogs at their sides. Similarly, the study claims to be interested in protecting wildlife, but the data just don't add up. First, there must be data collection at the different GGNRA sites, and then, if there is a proven harm caused by dogs (as opposed to natural predators), you must enlist professional help in finding simpler ways to solve the problem rather than going first to banning dogs. The same is true of concerns about the cliffs; instead of banning dogs you could simply install low fences.

Finally, the Compliance-based Management Strategy should not even be considered in any plan. It goes against the fundamental principles we live by. It would punish the vast majority of responsible dog owners because of the actions of a handful of a few 'renegades'. It is comparable to saying that if the police catch enough people speeding on Highway 101, (what is enough?) then they will close Highway 101 to all traffic.

For these reasons I oppose the Preferred Alternative and the Compliance-Based Management Strategy and urge you to obey the recreation mandate of the GGNRA. - Laurie Salen San Francisco, CA 94110

CC: Sen. Diane Feinstein Sen. Barbara Boxer Cong. Nancy Pelosi Secty. Ken Salazar Dir. Jon Jarvis, NPS Sen. M. Leno Assemblyman Ammiano Mayor Ed Lee Supvrs. David Campos

Correspondence ID: 4364 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely, Kathleen Thompson

Correspondence ID: 4365 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am opposed to the proposed regulations restricting dogs and their owners.

Correspondence ID: 4366 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type:
Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Correspondence ID: 4367 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Deon,

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA. The Bay Area is a model for enlightened co-use of our natural resources. The availability of nearby areas for the tax paying dog owners to exercise their animals and maintain a healthy lifestyle is necessary for a balanced society. Dogs have been living with humans as helpers and companions for countless generations. To deprive this natural pairing of the opportunity to enjoy nature together would be a mistake with unforeseen consequences

Sincerely,

Correspondence ID: 4368 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Correspondence ID: 4369 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

May 23, 2011

Re: Draft Dog Management Plan/Draft Environmental Impact Statement
Dear

Superintendent Dean,

I have lived in the San Francisco Fillmore District for nearly 40 years and have never had a yard. The public park lands have provided me with many recreational as well as meditational opportunities. I strongly support the preservation of our environment and open spaces in this densely populated city. I typically spend several days a week at Crissy Field walking and playing fetch with our dog. When I am unable to take him to the beach, I have dog walkers do so. Our dog Sam is a gentle black lab who loves to swim and play ball. He needs his exercise to stay healthy. Coincidentally, this regular exercise keeps me fit and healthy as well.

Given this background, I read your proposed Dog Management Plan with great interest. My experience is that dog owners are cleaning up after their dogs and respecting posted restricted areas. I looked for site-specific data on damage to protected wildlife and the environment that would support your proposal to severely restrict off-leash dog areas. I could find no data of the extend of the damage or specific causal ties to off-leash dogs at Crissy Field. I also could not find any trend numbers correlating off-leash dog use to deterioration of the environment. I found no scientific study to support your highly-restricted conclusions.

Certainly, some compelling factual basis needs to be provided to change the current 1979 Pet Policy. I could find no numbers based on violations of the current policy that would support the need for any changes, let alone such drastic changes.

Your preferred alternative will dramatically alter the quality of my life and the life of Sam. Spending time at the beach with Sam provides me with an opportunity to get to know neighbors. Many children want to pet and hug

the dog, Some adults want to play fetch or just reminisce about dogs they grew up with. Surely, these are the kinds of interactions we need in the city. To disrupt this community experience, you need compelling data based specifically on the unique GGNRA lands. I cannot support your Draft Dog Management Plan; you have provided no site-specific data to support a change in the current 1979 Pet Policy. Considering that now the GGNRA only allows off-leash dog walking on 1% of its land, further restricting off-leash areas is both unnecessary and punitive to urban residents.

Respectfully, Joan M, Kaplan San Francisco, CA 94115

Cc: The Honorable Nancy Pelosi United States House of Representative 235 Cannon House Office Building Washington, D.C. 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street N.W. Washington, D.C. 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street N.W. Washington, D.C. 20240

Senator Dianne Feinstein United States Senate 331 Hart Senate Office Building Washington, D.C. 20510

U.S. Senator Barbara Boxer 112 Hart Senate Office Building Washington, D.C. 20510(202) 224-3553

Correspondence ID: 4370 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I support protected dog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

There are so few places to take our dogs. Please don't reduce them even more.

Sincerely, Judy Higgum

Correspondence ID: 4371 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Frank Dean General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201, San Francisco, CA 94123-0022

Re; Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

No doubt this letter is one of many you have received since the DEIS/The Plan have been made public.

I have attempted to state my case in a contracted but concise form, as, no doubt, you have heard and know all the arguments against the DEIS/The Plan. Please do not mistake the brevity of my words for the lack of "fire in the belly".

Sincerely,

Jocelyn S. Carter San Francisco, CA 94116

May 24, 2011 Background

I am a native San Franciscan of 62 years. I have had dogs in my house and around me nearly all my life. I am 100% Asian. I retired a retired Nursing Home Administrator after 38 years in the industry.

My family home is located in the outer Richmond District of San Francisco very close to several GGNRA sites. These are sites my family has used and still uses to walk our dogs, no less than daily, over six decades. My 91 year old father still walks his loveable Labrador retriever off leash three times daily in these areas.

I live near a small neighborhood San Francisco park and use this site as well as GGNRA sites to walk my dog off leash. In the past, when the knees were more willing, I used GGNRA sites to run not only myself but my dog as well.

My Position

The position of the GGNRA in its DEIS and Plan is to effectively eliminate dogs from its jurisdiction. The GGNRA has cited reasons in support of its position (preservation of the environment and wildlife to name two) yet the GGNRA has not effectively shown the same impact by humans, their events/activities and natural predators, to name a few.

The GGNRA has not fully considered urban impact (city parks, area

resources), human impact (physical, mental, social) and it grossly believes the DEIS and The Plan will better serve minorities (minorities fear dogs).

The GGNRA is charged to "provide for the maintenance of needed recreational open space". It is not charged with restricting, eliminating, isolating and closing recreational space by reason of alleged non-compliance. Recreation is not anti-environment nor anti- animals. People who recreate with their animals also care for the environment.

I wishthat the GGNRA would consider partnering with neighborhood/community groups, animal welfare and conservation organizations and the cities affected in order to more effectively exercise its mandate of providing "...for the maintenance of needed recreational open space."

.....that the GGNRA would understand that education, and not compliance based management, may prove to be the key to long term and peaceful success here.

.....that the GGNRA would keep in effect the 1979 Pet Policy. It works.

Correspondence ID: 4372 **Project:** 11759 **Document:** 38106
Received: May,18,2011 00:00:00
Correspondence Type: Park Form
Correspondence: Thank you for the excellent meeting on Mar 7th, 2011. Professional and educational meeting along with spokespersons that were informative and responsive to all questions.

Why is it permitted to have dogs on our beaches? For public hygiene they need not be on our pristine shorelines. These animals, on leash or off leash do cause sanitation problems by leaving behind practices of defecating and urinating where others walk and children play. In many parts of California some counties do not welcome or permit dogs on the beach. Here, I ask when dog owners, at times, pick up their dog's defecation and place hopefully in a plastic bag and eventually deposit it some nearby receptacle. Is this recycled? Is the plastic material recycled? I would like the GGNRA to find out what happens in this situation and can it be improved with hygiene in mind.

At Fort Funston a dear old friend is attacked by dogs while relaxing on the beach at her favorite location. Sometimes disrespectful dog walkers hit her when attempting to keep dogs away. Her name is Carol Schuldt at. Carol gave me permission to share her telephone number for GGNRA interviews. Please call Carol for testimony about dog(s) intrusion and violent contact

with dog walkers.

I was responsible for the signs at Aquatic Park that state No Dogs on Beach. Yet when seeing the signs many continue to off leash their dogs onto the beach. I have never witness proper enforcement or the issuing of citations. A telephone number to call when violations occur is absent from all postings. A suggestion is to have a visible number for reporting dogs on the beach.

In summary my concern is about maintaining pristine beaches with no health problems left behind with dog defecation and urination, since this smell brings other dogs to do the same hygienic problem.

I am a life memeber at the Swimming + Boating Dolphin Club and have been swimming at Aquatic Park since the 1950's. With the Rest Rooms (2) closed we witness people and dogs defecating on the beach. This is unhealthy. I am available to address the above comments. Best wishes with reaching a compromise that reflects a healthier environment.

Steve

P.S. Continue to protect the natural world as best as you can....

Correspondence ID: 4373 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am wrting because I support protected gog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely, Susan Colh

I'm a responsible dog owner, have had a dog for the last 20+ years and am dismayed that off-leash sites for us to exercise dogs are limited more and more. Please help us!

Correspondence ID: 4374 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am wrting because I support protected gog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas

in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely, Edmund Tso

Keep precious space for our best friends :)

Correspondence ID: 4375 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Deon,

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA. The Bay Area is a model for enlightened co-use of our natural resources. The availability of nearby areas for the tax paying dog owners to exercise their animals and maintain a healthy lifestyle is necessary for a balanced society. Dogs have been living with humans as helpers and companions for countless generations. To deprive this natural pairing of the opportunity to enjoy nature together would be a mistake with unforeseen consequences

Sincerely,

Correspondence ID: 4376 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am wrting because I support protected gog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

Sincerely, Robert Hartley

I have a dog named Sam. Sam needs a place to run around. I pray that you keep this facility open.

Correspondence ID: 4377 **Project:** 11759 **Document:** 38106

Received: May,26,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Mr. Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Bldg. 201 San Francisco, CA 94123

RE: Marin Horse Council comments on the proposed GGNRA Dog Management Plan

Dear Mr. Dean,

The Marin Horse Council (MHC) is pleased to offer comments on the Dog Management Plan/Draft Environmental Impact Statement (Plan/DEIS) that outlines proposed rules for dog-walking on GGNRA lands. Even though MHC is a non-profit "horse organization" devoted to preserving the way of the horse in Marin County, many of our members own dogs and tend to think of them as members of the family. Whenever possible, we enjoy taking our pets along with us on outings away from home. We enjoy seeing our dogs run free and enjoying themselves. Be that as it may, we all care about the environment and realize that the "natural" or instinctive behavior of dogs is not in the best interest of the natural environment and we realize that dogs may occasionally upset other park visitors. We want to emphasize, however, that dogs usually do not cause a problem for horses. Dogs with responsible owners and equestrians usually get along well as we pass each other on the trail.

Of the seven GGNRA sites for review in Marin County, most horseback riding is on the Oakwood Valley/Alta Trail and over the Marin Headlands and Fort Baker sites. We are, therefore, limiting our comments to those two areas. It is no surprise that our Board is not in unanimous agreement about the best of the Alternatives A through E. However, we have made an effort to balance no-dogs and on-leash-only areas, with "Under voice control" in regulated off-leash areas (ROLAs). We, therefore, go in favor of the plan's Preferred Alternative C. This, we feel, could reduce user conflicts, enhance safety of users and dogs, and protect the environment. The ROLA proposed for the Oakwood Valley Fire Road will be fenced along the sides, as well as gated at both ends. As equestrians, we would like to see the type of gate that could be opened from horseback. It has been noted that, aesthetically, a fence along both sides of the fire road will detract from the "wilderness" feeling of the trail. The fence would also block wildlife from crossing the trail. That said, alternative C remains most favorable. As for the single-track trail (across the creek and roughly parallel to the fire road), it would be desirable to see the trail improved so that it could be enjoyed by both hikers and equestrians.

The enforcement policy proposed by GGNRA relies almost entirely on voluntary compliance. We feel that without more stringent enforcement, many dog walkers will ignore the rules. The Marin Horse Council agrees

with Marin Conservation League that a compliance-based management strategy needs to be supplemented, from the beginning, by vigorous enforcement efforts that include (a) a visible increase in uniformed law enforcement presence; (b) increased issuance of citations, particularly to aggressive violations; and (c) tracking of repeat offenders. Clear and prominent signage is most important. Signs that are damaged need to be replaced quickly and persons caught vandalizing signs should be prosecuted vigorously.

If the proposed limitations on dog walking are observed by users and adequately enforced by GGNRA, they could reduce user conflicts, enhance safety of users and dogs, and protect the environment. MHC looks forward to working with GGNRA personnel as they strive to balance the goals of protection of the environment and an attempt to accommodate dog walkers and all who enjoy the treasure we have in GGNRA.

Respectfully,

Joel Bartlett President, Marin Horse Council

Correspondence ID: 4378 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am wrting because I support protected gog areas, and I am OPPOSED to the GGNRA Dog Management Plan to reduce protected dog-playing areas in 21 places in the San Francisco Bay Area.

I do not think this plan should be implemented.

I am a dog owner who has used GGNRA off-leash for years. This is one of the few remaining areas I can go with my dog and enjoy the outdoors together.

Sincerely, Sofie R.

Correspondence ID: 4379 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Sue Olsan

I'm a dog owner - We need to be open to 4 legged friends. Most of us obey rules.

Correspondence ID: 4380 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Frank and Howard,

It has been a pleasure working with both of you on important projects spearheaded by the Golden Gate Parks Conservancy and the Golden Gate National Recreation Area. In the last year, we made significant progress specifically on two initiatives'Food for the Parks and Park Prescriptions, and we have had fun at the same time.

Please allow me to share my thoughts with you on another topic dear to my heart and currently front and center for the Golden Gate National Recreation Area'the Draft Dog Management Plan. My request is that you choose Alternative A, the No Action alternative. I also request that you include the "New Lands" areas (such as Cattle Hill, Sweeney Ridge, Mori Point, Pedro Point, Milagra Ridge, and Rancho Corral de Tierra) in San Mateo County.

This request stems from the fact that I am an avid environmentalist, a dog owner, and a dog lover. I have worked as a conservation professional for 20 years, and I understand the challenges of balancing human needs with environmental protection. This task is particularly hard in our beautiful, urban setting that has a higher proportion of people and dogs than most National Parks. I understand how complex this issue is because your decision will impact the health of people, the environment, and domestic animals. I am hopeful that it is possible to find a way that we all can coexist today and in the future.

I know it is crucial that our dogs are well behaved and trained. Additionally, adequate exercise and socialization are essential for a well-behaved dog. Having places where I can take long walks with my dog allows me to get the exercise I need while also meeting my dog's needs. In fact, this reminds me of Dr. Daphne Miller's suggestion that one way to improve the health of people is to get veterinarians to write prescriptions for dog owners and their dogs to take walks. Just as Golden Gate wants to facilitate healthy activities for people, we need to make dog walking easy as well. Some people will prioritize the need to keep their dogs healthy while ignoring suggestions from their own doctors. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dogs and dog guardians will not have sufficient opportunity to exercise and recreate.

It is also a priority for me that the final plan includes corridors from parking areas to off-leash areas. The preferred plan requires that dogs be on leash in order to reach the off-leash areas. It is essential to have some locations that allow dogs to release energy at the beginning of the walk (when they need it most). It also seems to me that there are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent.

The GGNRA could develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. For example, in partnership with dog-associated businesses, perhaps it would be possible to create an annual permit system that includes modest education requirements in order for regular off-leash dog use. I could see that something like this could generate revenue for the National Park Service or the Golden Gate Parks Conservancy.

The draft plan has the effect of punishing many people simply because a very small number might need education or are insensitive and irresponsible. It is also possible that we could improve the current signage of off-leash areas. A possible response to this problem is to educate visitors, improve signage, and help park visitors follow the rules and learn how to

respect the environment.

Thank you for letting me express my support for Alternative A, the No Action alternative. I also hope that the final plan would also include the "New Lands" areas (such as Cattle Hill, Sweeney Ridge, Mori Point, Pedro Point, Milagra Ridge, and Rancho Corral de Tierra) in San Mateo County.

Thank you for your hard work on this issue. I am impressed with the care and consideration you have given to this important and highly emotional issue.

Respectfully,

Patty Debenham, Ph.D. San Francisco, CA 94115

CC: Representative Nancy Pelosi 8th Congressional District of California, House Minority Leader, United States House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Correspondence ID: 4381 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

I have a dog. Please keep it open. We love them and we need them. They our best friends.

Correspondence ID: 4382 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mr. Frank Dean General Supervisor, GGNRA Building 201 Fort Mason San Francisco, Ca. 94123

Dear Mr. Dean,

On the subject of dogs in the GGNRA, I have a few observations based on years of walking with and without dogs in Marin County. My experience is limited to the Miwok Trail from Tennessee Valley; and, from Shoreline, Countyview, Miwok cutoff and Oakwood Valley Trail . Overall, our society could dispense with many regulations, signs, and enforcement protocols IF civility, common sense, a little foresight, perhaps the Golden Rule, were the norm.

Several groups of park users perceive conflicts in their use of parklands. In rational discussion, no individual or group would boldly suggest that theirs is the only valid use, and others should begone. In practice, the clamoring "me, me, me" inner child can frequently take over. If I am loud and numerous, regulation writers will hear me and feel that they are serving the people.

Dogs should be mostly restricted to the fire roads and trails, and should not roam the chapparal at will and unleashed. There are dangers to them in the brush, and the wild animals should be free from predation by pets. Oakwood Valley Trail has delighted me weekly for years with deer, coyotes, bobcats, raccoons, rabbits, skunks, snakes and all manner of birds. My dogs are not allowed to pursue any of them. The proposal to close the "trail" side of Oakwood Valley Trail will dramatically degrade the experience; and, the suggestion of a double fence seems to be harassment of wildlife by interdicting free passage to drinking water.

Miwok Trail from Tennessee Valley starts from a parking lot that serves a stable. As the approach is very suitable for cyclists as well, this trail would be a good "no dog" choice, as it is steep and narrow and used by several classes of park visitors.

The Miwok Trail from Shoreline does not seem very conflicted - Limited Parking reduces congestion ,and walkers, dogs, riders and peddlers seem to have enough space. Countyview feeds Miwok above Tennessee Valley and would not appear to be crying for regulation.

Educational signage and enforcement of existing common sense derived regulations would be most appropriate.

Bicycles ought to have a bell and use it on turns and blind corners.

Bicycles should slow down on hills and use a maximum speed of 8 mph when passing. This is not a cyclocross or X games venue.

Single file is frequently wise for all groups.

Dogs harassing wildlife will not be tolerated. Use a leash and stay on the trail.

Groups of four or more ' bikes, horses, dogs, and people should be conscious of their impact on others and seek to ameliorate it.

Hopefully, we can take a realistic approach to solving these issues for ALL stakeholders by enforcing existing rules, using educational signage, and not wasting a lot of money on this subject. Very respectfully, Janey Schaefer Mill Valley, CA. 94941

Correspondence ID: 4383 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 23, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I have been a Bay Area Resident since 1977 and have lived and worked in SF, San Mateo and, most recently, Sonoma County. I have explored beaches and trails throughout the Bay Area, enjoying them for the last several years with our family member and best friend, a Vizsla named "Maia". In my senior years, she is a joy and a willing partner for outings that connect us to the recreational pleasures the Bay Area offers. I enjoy the landscapes/vistas

and the social interaction/friendships that is the Vizsla "lifestyle". The outings keep us young in spirit, fit in our bodies, and balanced for the demands of a busy life.

Over the years I have enjoyed most, if not all, of the areas in the GGNRA on foot, horseback, bikes and, more recently, with my canine partner. We continue to frequent beaches and trails, especially in Marin and SF, with a favorite being Ft Funston. Most weeks we are at the beach or doing long hikes 2-3X's in addition to "urban" leashed walks and dog park romps.

I have been a long-term member and supporter of the Sierra Club and the Waldo Holt San Joaquin Wildlife Conservancy. I pursued post-graduate study in Ecosystem Management with emphasis on native species/ecosystems. I studied the native dune communities in SF and San Mateo Counties and mapped the endangered species, *Tanacetum Camphoratum*, the Dune Tansy. So, while I love my dog, I also love the native California plant/animal communities and respect the fragile ecosystems. One of the things I enjoy on our walks together is looking at the native vegetation and wildlife/birds. Many of my fellow canine enthusiasts respect the ecosystem(s) as much as I do and find the experience with our dogs in nature restorative on every level.

My dog and I have attended training sessions to learn basic obedience skills and recall. She has been well socialized to both people and dogs and is an exceptional companion at home, around town and on the trail. I expect my dog to be well behaved and responsive to voice commands on leash and off. I leash my dog to keep her from sensitive areas and clean up after my dog. As a dedicated hiker/walker/bicyclist and ex equestrian, I also educate fellow dog and non-dog enthusiasts about canine/human/equine/bike interactions. On walks, I educate friends about the native plant/animal communities. In short, if you were to encounter my dog in an urban or rural setting, you would very likely have a positive encounter that would leave you smiling: her enthusiasm and joy for life are hard to match!

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi faceted approach that incorporates

education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. I live in Sonoma County and have strong ties to the lands of the GGNRA as do many of my friends and fellow dog enthusiasts that live in SF/North/East/South Bay Counties. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for RESIDENTS OF THE BAY AREA. NEPA requires evaluation of impacts on the "human environment": the DEIS fails to do so by failing to adequately address how the proposal will affect "recreational" values as well as natural, scenic and cultural values on RESIDENTS OF THE BAY AREA.

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as adversarial values i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment. I believe I am a good steward of the environment and I believe that many of my fellow dog lovers are also good stewards. This bias extends to the overall document, pitting recreation vs natural values rather than identifying and exploring reasonable alternatives where nature/recreation can work together.

Further, the proposed broad limitations in the DEIS are largely without site-specific science that demonstrates that the perceived degradation of the quality of the GGNRA's natural resources are actually attributable to dogs vs other factors. For example, much of the impact on native dune habitat that I have seen at south Ft Funston is due to non native/invasive species, erosion, equines and transients/homeless encampments vs foot/dog traffic. After careful consideration, I support Alternative A, the No Action alternative and would also include the "New Lands" areas in San Mateo County. The DEIS is biased against the No Action alternative and failed to take a good look at this as an option. There are many areas in the GGNRA where the 1979 Pet Policy has been working and where sensitive species are not present and conflicts occur infrequently or not at all. Ways of improving how GGNRA carries out/administers the current 1979 Pet Policy should be considered and given a fair assessment. I believe that the current

management plan will work for the many years if "tweaked" to provide clearer rules, improved compliance and reduced potential for conflicts. The majority of the "problems" with the current plan are problems of management/implementation/education vs access. If there are problems with access, then the DEIS doesn't provide a scientific or technical basis for the severe limitations proposed on continued dog walking.

Thank you for your consideration.

Respectfully,

Barbara Haushalter Petaluma, CA 94952

Cc: The Honorable Nancy Pelosi United States House of Representatives
235 Cannon House Office Building Washington, D.C. 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street, N.W.
Washington DC 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W.
Washington, DC 20240

Crissy Field Dog Group P.O.Box 475372 San Francisco, CA 94147-537

Correspondence ID: 4384 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or

destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Kim Galloway

Dog populations are growing and current plan is very short sighted.

Correspondence ID: 4385 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean :

I am a long time San Francisco resident and live with my wife and our family dog in the Presidio Heights neighborhood. We live in a condominium and do not have a backyard. The Presidio and adjacent GGNRA lands are our backyard and playground. My wife and I walk our dog together and with friends who also walk their dogs at Crissy Field, Baker Beach and Fort Funston several times a week. Additionally, my mother and father who currently live in Palm Desert and are both in their 80's particularly enjoy visiting Crissy Field and walking with our dog as she runs, swims and plays with other dogs. Our outdoor activity, daily exercise and socializing revolves around our time with our dog at the GGNRA parklands. Because of this we financially supported the hugely successful renovation of Crissy Field 10+ years ago. We have been thrilled to see how Crissy Field has become better and better over the years as the plants have matured, buildings have been renovated and as more and more visitors enjoy the area ' those with and without dogs. Given the importance of the health of the Bay and its wildlife, we are also ongoing active supporters of the Farallones Marine Sanctuary Association and the Marine Mammal Center.

I have taken the necessary steps to ensure that my dog and I are both good citizens and responsible members of the community. My dog has been awarded her Good Canine Citizenship certification and is an Animal Assisted Therapy dog with both the SF/SPCA and with Delta Society. We observe all signs with respect to dunes, vegetation and wildlife. We walk on a leash were (and in the case of the wildlife section of Crissy Field, when) off leash is not permitted. When off leash, she is under voice and sight control. Further, not only do we clean up after her we try to leave the beach

cleaner than when we arrived. I have noticed that the vast majority of dog owners at Fort Funston, Baker Beach and Crissy Field, those areas we visit most frequently, are similarly careful and conscientious. Walking our dog with our friends is how we socialize, stay healthy and enjoy the outdoors. Access to these areas ' access that is equal for all visitors to the GGNRA parklands - it is critical to the quality of our life in the Bay Area

As such, it will come as no surprise that I am alarmed by and do not agree with the GGNRA's current preferred alternatives for Fort Funston, Crissy Field and Baker Beach as they significantly restrict and eliminate the already limited off leash dog walking in these areas. The proposed changes to the existing alternatives (those agreed to in the 1979 Pet Policy) and the virtual elimination of access to the parks for people and families with dogs to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site specific conditions.

As presented in the DEIS, the proposed dog management plan eliminates dog- walking (on and off leash) access for all new lands (additions to the GGNRA sometime in the future) within San Mateo county lands. This position is highly discriminatory and does not reflect that GGNRA's mission applies equally to new lands as existing lands and it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands.

I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas. The GGNRA is a community resource and urban oasis that makes the Bay Area a wonderful place to live. Community and recreation friendly options that educate and direct all park goers, those with and without dogs and those on bikes, should be adopted. For example, environmental barriers and chipped paths, such as the vegetative barriers surrounding the tidal marsh at Crissy Field or the restored dunes at Fort Funston or the new paths in the Presidio, help guide walkers ' with and without dogs - as to the places where it is ok to walk.

We all share our urban environment. Those I encounter on our walks include people with and without dogs, people on bikes, dogs, horses on cliff paths to the beach and on the beach, coyotes in the parks, the sea birds and sea mammals, not to mention the plants and many other living creatures. I often see raccoons and skunks in the early evening hours. Suggesting that dogs are responsible for wildlife impact and vegetation degradation without any credible science is irresponsible and highly inconsistent with observable activity.

Adequate exercise and socialization is essential for a well-behaved dog. Having places where I can take long walks with my dog, my family and my friends, allows me to get the exercise I need while also meeting my dog's

needs. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dog and dog guardians will not have sufficient opportunity to exercise and recreate. I am further concerned that the closure of GGNRA park lands to dog-walking recreation will lead to unpleasant and unnecessary friction with Park Rangers and personnel leading to bad feelings and bad press about the GGNRA parks and will lead to overcrowding in our city parks.

Further, walking in the GGNRA provides a unique opportunity for solitude in a safe, beautiful and un-crowded outdoor space. I am in the GGNRA parks with my dog rain and shine. Aside from the sunniest and warmest of days (few and far between in the Bay Area) the vast majority of people I see are those with dogs. To restrict these recreation areas to only people without dogs would be discriminatory and would leave the beaches and adjacent parks empty, literally empty, the vast majority of the time. People with their dogs make the Parks a safer and friendlier place.

In reviewing the DEIS specifically with respect to those places where I most frequently visit I have noticed some concerning errors and omissions. The DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often the best stewards of our environment.

The draft plan has the effect of punishing the majority of park visitors ' dog guardians - because a very small number of park users, with and without dogs, are uneducated, insensitive, or irresponsible and because the current signage of acceptable walking areas and sensitive areas is unclear. With respect to treading on dune and other sensitive areas frequently see families and children playing in these areas, often for hours at a time. I rarely see dogs running on the sensitive habitats. Dog owners do their best to follow the rules when those rules are posted clearly. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban those of us with dogs from the GGNRA. I wish that the DEIS would include an alternative along these lines.

Further, the proposed "compliance-based" approach should be modified to create a baseline of current conditions, then measure impacts of all user groups. It should take a positive and community friendly approach, not a negative, punishment oriented approach. Compliance should start with a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups can and

will bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities and not act in an adversarial manner.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. As I mentioned in my first paragraph, we live in a condo and do not have any outdoor space. The GGNRA is our outdoor space as it is for the vast majority of people in the Bay Area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for RECREATION for all residents and visitors to the Bay Area including for those people walking their dogs. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support this claim and to measure the impact of all users of the parks including hikers, families with children running on the dunes and cliffs, horses, and hikers. Further, there is insufficient documentation that considers and weighs the relative, and often significant, other impacts ' other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. Here is some quoted text from UpTake.com, a travel web site encouraging people to swarm to Crissy Field for Fleet Week :

Crissy Field may well be one of the most crowded beaches around the Bay Area seeing as how this Thursday is the beginning of San Francisco's Fleet Week.

And quite possibly the best place to view the Blue Angels is on the shores of Crissy Field. If you prefer to spread out a blanket on grass, there are large verdant lawns perfect for picnics. But if you would rather watch the show from the beach there is a rather nice beach, as well.

There are a myriad of paths that wind down through the Presidio and into the restored wetlands of Crissy Field, perfect for bikes, roller blades, strollers, even wheelchairs. The Blue Angels are scheduled to begin at 3pm; arrive early as parking is notoriously tough.

And here is a photo from Fleet Week 2010... note, the people on the fenced off dune and no dogs. The dogs are not the problem with preserving our natural resource. It is the people. The proposed broad limitations in the

DEIS are without site-specific science that prove that challenges with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. In fact, the DEIS takes a default position, without science based evidence, that dogs are the only contributing factor. A stroll around these park and beach areas and you will likely see, as I have seen on my hundreds of walks, well behaved dogs enjoying swimming and fetching near the water while families are picnicking, hiking and climbing in the sensitive dunes, vegetation and cliff areas. My years of observation makes it clear that DEIS premise is deeply flawed and solid evidence of its claims is completely lacking.

The DEIS needs to provide full disclosure to the public and decision makers. If dog-related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. For example, the wildlife area of the beach of at Crissy Field frequently has hikers and families parked for the day in the dune areas where the snowy plovers are said to nest. These families have completely ignored the signs and often leave their trash behind. The dogs and their owners are by the water and on leash. Perhaps the GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas or if recreating with and without dogs can only occur within X feet of the highwater mark, for example. This, of course, would include visitors for Fleet Week and other events. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone ' so that an informed community based decision can be made.

Recognizing that improving Crissy Field and other GGNRA lands is a continuous and collaborative process, I do support some of the modifications presented in the proposals provided that these modifications are made to the Existing Alternative. For example, I am in favor of an on-leash policy for dogs in all parking areas. However, after much consideration and review of the very large amount of material, and with the addition of on-leash rules for parking areas, I support Alternative A, the No Action alternative for Crissy Field, Fort Funston and Baker Beach. Additionally, I also include the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra) in San Mateo county in my comments and support that these areas be open to generous on-leash (parking areas and other truly environmentally sensitive areas where people, horses and bikers are also restricted) and off leash dog walking as well.

The DEIS is strongly biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working and

where these areas have become safer and friendlier because of the dogs and their people. No site-specific evidence has been provided to support restrictions on dog walking or any other human activity. Until this happens, and a thoughtful and community based solution can be adopted, we should not change the existing status of things... an arrangement that seems to benefit people and the parks as evidenced by the increased usage of the GGNRA areas by Bay Area residents with and without dogs and by visitors on foot and bike.

Respectfully, Michael E. Carboy San Francisco, CA 94118

CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Crissy Field Dog Group

Correspondence ID: 4386 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 23, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area, Building 201 Fort Mason San Francisco, CA 94123-0022

Dear Superintendent Dean:

I am disabled because I suffer from Bipolar Disorder. I have lived in Marin for over 35 years, and hiked every trail on Mt. Tamalpais, as well as the Marin Headlands, and I worked back in the '70s at Marine Mammal Center. In all those years, we have enjoyed taking our dogs to Rodeo Beach, Fort Funston, Ocean Beach and Crissy Field, as those are the only places they could run off leash. Every dog I've ever owned has been voice-control trained, well behaved, and I have always picked up their feces, plus any others I happen to see.

I now have two huskies, and since I got them, have had knee surgery and several other things which have made hiking impossible for me anymore. As a result, the only places I can take my dogs are the above and dog parks. Huskies need to run, especially young huskies, so I have always been grateful for the GGNRA areas where they can do so. I have learned of your plans to severely restrict off-leash dog walking in the areas I have frequented, and was dismayed to find out about it. I wanted to look into the issue before writing to voice my concerns, and have been even further

disturbed to read the Draft Dog Management Plan.

From what I have read, this plan is poorly written, contains inaccuracies and does not address important issues. For one, it doesn't take into account the quality of life in an urban environment where recreation is limited for those of us with dogs who are a large part of our outdoor activities. My quality of life has gone downhill for several years now, and the places I enumerated have become a larger and larger part of my ability to get outdoors. Being outdoors is vital to my mental and physical health, and without places where I can get out with my dogs, my outdoor activities become virtually nil. I can't just go out and sit, nor can I hike any longer; taking the dogs to the beach is important to my health and allows me to get outside without having to walk much. I have always loved the ocean; having been born in the Bay Area, it has always been a huge part of my life.

I was happy when the GGNRA came to this area, as it preserved places like the Marin Headlands, which are close to my heart. We've been frequenting Rodeo Beach all the years we've lived in Marin, I've rescued seals and sea lions there, released them there, and taken my breaks there in the years I worked for Marine Mammal Center. To have Rodeo taken away from my family and our pets is a huge blow. Given it is the Golden Gate RECREATION Area, I can't understand why there is a move to take these areas away from us.

For another, given my mental and physical condition, I live a relatively isolated life. I've been able to meet people, get to know them and their dogs, and now I'm at the point where the only socialization I get is within these groups. I value that highly, and I know most of us won't frequent these areas without our dogs and I will lose contact with those friends. I'm uncomfortable in most social situations and don't have visitors to my home, so I would be even further isolated if I couldn't take my dogs to the beach.

All my dogs have been well socialized from an early age, and I have trained them all myself to walk off leash and be good social inhabitants. If there are not places like this where people can take their dogs to learn to be good citizens, I can envision upcoming generations of pets, not having gotten the chance to be socialized from a young age, being less controllable and causing more problems for their owners and their neighbors. People love my dogs and children get the opportunity to learn not to fear dogs by meeting mine, which is healthy for both the dogs and the children. There are few dog parks available where this is possible and not many bring children to them, so I also fear for upcoming generations of children who miss the opportunity to meet well-behaved dogs. Pets are important to our well being; healthy, well-behaved pets especially so. I can't imagine, in my circumstances, being without my dogs, and my dogs would not be the good citizens they are if I

weren't able to socialize them and let them meet other dogs off leash.

Within the "dog management plan" I saw many references to detrimental impacts by off-leash dogs, yet I saw no backup or specifics to indicate their existence HAS been detrimental, only suggestions of how they "might" be. All the dog owners I know are very careful to pick up any animal waste, theirs and others', and we point out to others who might not see their dog eliminating that there is poop to be picked up. We self-police to a degree I find impressive specifically BECAUSE we don't want to impact the environment negatively or cause difficulties for others. My dogs have always been trained to not disturb wildlife and I never allow them to set foot on areas designated as protected. All the other dogs owners I know are the same, and I've yet to see any negative impact caused by dogs in the areas I mentioned, so I don't know where the evidence for deleterious effects by dogs was obtained. I would like to have actual facts taken into consideration before a Judgment is made that the environment has actually been affected.

I have personally never seen any dog harass wildlife at any of the places I listed. At Fort Funston and Crissy Field, for example, there are specific areas delegated for wildlife; I've never seen any dogs in those areas and I know personally that people who frequent those areas respect the wildlife and control their dogs. We love the environment as much as or more than most people and want it protected. I see people drop cigarette butts and litter all the time; I see dog people picking UP such things, as do I. People with dogs get out a lot more in places such as this and we treasure these environments.

I've seen very few people at Fort Funston BESIDES people with dogs. It's not an area that is or would ever be popular for many other activities; if people with dogs don't utilize it, I don't think it will be of much value to many other people. It's cold, windy, out of the way and many wouldn't consider it scenic, so I'm not sure how much "recreation" it would provide if it weren't for us. As for Crissy Field and Ocean Beach, if nothing else, I would suggest taking into consideration making perhaps HALF of them no-dog or leash area; they are huge, long beaches which could easily accommodate both those with dogs and those who don't want them around. Rodeo Beach is also not a popular place, partly because of the weather there as well. There are people with dogs out there in even the worst weather, when nobody else would frequent the area, and I've never seen any conflict between off-leash dogs and people there in all the years we have frequented it. GGNRA was set up as a recreation area; that should include all forms of recreation. Bicyclists, runners, equestrians and others have myriad places in the Bay Area for recreation; only a few places are available to dogs and dog owners. Our form of recreation is as valid as any other and that should be taken into account. The 1979 "pet policy" was set up to recognize dog walking as a legitimate form of recreation; to change that policy would have

a negative impact for many in an urban area where there are few "recreation" areas available for dogs and their owners. For decades my family and I have been grateful for the GGNRA; for me personally, it would become essentially useless if this proposed action is implemented. Please give ALL of us the use of the GGNRA equally. Thank you for your consideration.

Sincerely, Niki Beecher San Rafael, CA 94901

cc: Senator Feinstein Senator Boxer Congresswoman Pelosi
Congresswoman Speier Secretary Salazar Director Jarvis Director Lehnertz
Mayor Ed Lee S.F. Board of Supervisors

Correspondence ID: 4387 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

I'm not a dog owner, yet I'm concerned if dogs (especially larger ones) don't have enough space to run around since most people in the bay area have limited to no back yards. If it's necessary to cut some places can other places

not be added so dogs have adequate, public space to exercise?

Correspondence ID: 4388 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

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Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Marion D.

Don't like the plan you have for the dogs.

Correspondence ID: 4389 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

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We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Rob Light

My Emma would be very disappointed!

Correspondence ID: 4390 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Frank:

The Presidio Trust (Trust) recognizes the importance of the National Park Service's (NPS) efforts to manage dog walking on national park sites and submits the attached comments on the Draft Environmental Impact Statement for Dog Management (DEIS) in the Golden Gate National Recreation Area (GGNRA) in support of this process. The Trust has a key interest in NPS dog management planning in the GGNRA and therefore in the adequacy of the EIS. It is for this reason that the Trust is participating as a cooperating agency in the National Environmental Policy Act (NEPA) process for the dog management project.

We commend the NPS's hard work to date in attempting to craft a thoughtful resolution to a long-standing and impassioned controversy to further the effective management of GGNRA public lands. However, as discussed in the attachment to this letter, we believe that further effort will

be required to thoroughly analyze potentially significant impacts. Until that work is done, it would be premature of the Trust to voice a judgment with respect to any of the alternatives, including the preferred alternative.

As the steward of the interior portion of the Presidio, known as Area B, which is adjacent to lands that are managed by the NPS, or Area A, the Trust brings expertise in managing diverse park resources in an urban environment. With more than 8,000 people living, working, or attending school in Area B of the Presidio, in addition to daily recreational users, the Trust understands the challenges of maintaining a balance among the differing, often competing needs of many users so that the Presidio's resources can be enjoyed today while also safeguarded for the future.

Experience over the past decade and more has shown us that major planning decisions made for Area A invariably affect operations, resources, and activities in Area B. Area B contains approximately 20 miles of trails and 1100 acres of developed areas and open space directly adjacent to Crissy Field and Baker Beach, both of which receive intense visitor use, including that from dog walkers. Tighter restrictions on dogs in these waterfront areas will almost certainly increase dog-walking activities in Area B, resulting in potentially significant impacts to Trust-managed parkland.

The Trust well knows that managing conflicting visitor uses on public lands while simultaneously protecting natural resources for future generations is a difficult task. In the context of a complex, controversial, and volatile issue such as dog management in a dense urban area, the task becomes much more challenging. The Trust also understands the demands faced by NPS staff and contractors in preparing the DEIS, and applauds the hard work that has gone into preparing the document and engaging the public.

Of necessity, the Trust's comments focus on areas in the DEIS that need augmentation, and we hope that our comments will be taken in the spirit in which they are offered: to improve the impacts analysis that informs the NEPA process and ultimately to support the formulation of a dog management policy for the GGNRA that wisely balances the mandates of resource stewardship, preservation, and public use. Craig Middleton
Executive Director

Enclosure

**PRESIDIO TRUST COMMENTS ON THE GGNRA DOG
MANAGEMENT PLAN / DRAFT ENVIRONMENTAL IMPACT
STATEMENT**

May 25, 2011

The Presidio Trust (Trust) provides the following comments on the GGNRA Dog Management Plan / Draft Environmental Impact Statement (project). Due to the length of the DEIS and limits on Trust staff time to review, the following comments focus on the NPS's preferred alternative and indirect impacts on Area B, but the comments generally apply to all alternatives.

GLOBAL COMMENT

DEIS Fails to Analyze Indirect Impacts of Dog Management on Area B in a Meaningful Manner

The Trust finds the DEIS deficient in its treatment of impacts of the various alternatives for managing dog walking activities on areas outside of NPS jurisdiction, particularly in Area B. In the Trust's scoping letter' for the DEIS, we specifically urged that "because the Trust has a stake in how dogs within Area A will be managed, the EIS should include a discussion of how the alternatives will impact Area B visitors and resources, and Trust staff" (page 2). Dog walkers using the Presidio do not necessarily distinguish between the two areas. The DEIS does not address the areas within Area B that are currently used by dog walkers, nor does it address the incidence of off-leash violations in Area B. The DEIS presumes under all resource topics and all alternatives being considered that no impacts would occur in Area B. The rationale offered is that the Trust does not have beaches under its jurisdiction and does not allow off-leash dog walking; therefore, there would be no change in current conditions in Area B. It is far more likely, however, that restricting or eliminating dog walking in Area A will substantially increase off-leash activity in Area B as a substantial number of dog walkers may seek more secluded trails in the Presidio to avoid crowded conditions and where there may also experience fewer law enforcement staff to enforce rules.

The analysis and conclusions offered by the NPS in the DEIS are not sufficiently supported and do not represent a fair consideration of the adverse environmental effects of its proposed dog management. The dismissal of impacts in Area B is especially perplexing given that the DEIS provides a site-specific analysis of the effects of on-leash dog walking in other parts of the GGNRA, even after assuming compliance with regulations. The DEIS must make a good faith effort to thoroughly consider all indirect effects that are "reasonably foreseeable"² in areas outside of its jurisdiction. The Trust is willing to provide data and information to the NPS. Under NEPA, if a significant issue is omitted and the advice and expertise of a cooperating agency ignored, the EIS may be found to be inadequate.³

I. SPECIFIC COMMENTS

CHAPTER 1: PURPOSE AND NEED FOR ACTION

Reference to Area B is Confusing

As stated in the Introduction on page 1, without reference to Area A, it appears to the casual reader that Area B is adjacent to the Presidio, which it is not. The discussion should distinguish between Area A and Area B, and indicate that Area B is a national park site under separate jurisdiction. Some background about why the Trust is a cooperating agency would also be helpful. Otherwise, the reader is required to sift through 1733 pages to understand the Trust's interests, authority, and responsibility in the NPS dog management project (as provided in Chapter 5: Consultation and Coordination).

Increased Conflicts on Adjacent Parks due to Tighter NPS Restrictions not Acknowledged

The second issue under Land Use / Long-term Management of Resources or Land on page 17 of the DEIS correctly states that dog management policy at GGNRA may result in changes to federal, state, and local policies elsewhere. However, the key issue that more restrictive dog management policies on GGNRA lands would increase pressure on adjacent parks (such as Area B) is not mentioned. Also, the topic of land use is included in the list of impact topics that were analyzed in the plan/EIS, but is not followed through in Chapters 3 and 4, as is customary for an EIS of this nature.

Information on Area B Dog Management Policies and Issues is Absent

The NPS's "goal of consistency" is commendable and should be made more explicit as a specific objective that the NPS intends to accomplish by this process. In the Summary of Background Conditions and Review of Literature beginning on page 25 of the DEIS, the discussion states that park staff "has amassed as much information as could be found on dog management-related topics" on lands adjacent to or near GGNRA sites. The discussion suggests that such information, including that provided by other jurisdictions, was used to "assist with the development of alternatives that meet the goal of consistency with policies on adjacent lands." However, nowhere is found any mention of Trust dog management regulations, or information on Area B visitor experience/dog management conflicts, enforcement success, or compliance issues. This information has been made available to the NPS in previous correspondence and is readily available from the Trust upon request. The information should be included so the public and NPS decision makers may have an understanding of potential conflicts in adjacent areas caused by changes in NPS dog-related recreational opportunities on GGNRA lands. The Upcoming GGNRA General Management Plan Should be the Principal Tool for Resolving Dog

Management Issues

On Page 37 of the DEIS, the NPS states that it is updating its General Management Plan (GMP) for the GGNRA concurrently with the Dog Management process and that the GMP will defer specific dog-management actions to the completion of the Dog Management EIS. Not only is decoupling the two processes inconsistent with NPS policy' on how a park's resources, visitors, and facilities should be planned for and managed, it forecloses the important opportunity of conducting the dog management planning process within a well-grounded and broadly understood framework. Park planning is intended to be a deliberate and transparent decision- making process that arrives at a rationale for management directions after several levels of increasingly detailed and complementary planning. The Trust strongly suggests that the NPS first determine what the desired conditions should be for natural and cultural resources as well as for visitor experiences, or in NPS's words, reach agreement on what should be the "blueprint for the park to move into the future" (page 37 of the DEIS). Only then should the focus narrow to how various dog management strategies throughout the GGNRA would contribute to achieving those conditions, and whether such strategies are consistent with the goals articulated in the GMP.

Analysis of Consistency with Trust Land Use Policies for Area B is Required

The Trust welcomes the discussion on page 38 of the DEIS that we provided in our scoping letter regarding the distinctions between the General Management Plan Amendment for Area A and the Presidio Trust Management Plan (PTMP) for Area B. At the end of the third paragraph, please insert the following:

Management objectives in the PTMP relevant to dog management include the following:

? Provide for safe and enjoyable recreational use of the Presidio. ? Identify and protect sensitive wildlife species, and restore and maintain their habitats. ? Provide diverse opportunities for both passive and active recreation. ? Maintain an atmosphere that is open, inviting and accessible to visitors. ? Consider activities best suited to the Presidio. ? Balance recreational opportunities with resource protection. To achieve this balance, consider the type and level of visitor use that can be accommodated while sustaining the desired resource and visitor experience conditions.

As required by the NEPA and as requested in our scoping letter, the EIS should include a discussion of the conflicts of the dog management project

with the Trust's land use policies provided above.⁵

Trust Regulations Regarding Dog Management are Absent

From pages 34 to 42 under Related Laws, Regulations and Policies, the DEIS fails to mention Trust regulations regarding dog management.⁶ This information was previously provided to NPS. Again, the DEIS should note that Area B is subject to the Presidio Trust's regulations, which the Trust adopted after publication for comment and which appear at 36 C.F.R. Section 1001 et seq. Also, it would be expedient but inaccurate to list the Trust with the 11 agencies listed under State and Local Laws, Regulations, and Policies on page 41 of the DEIS. Area B of the Presidio is a national park site within the GGNRA, and the Trust, like the NPS, is a federal government agency charged with representing national interests.⁷ The Trust's regulations are issued pursuant to the Presidio Trust Act,⁸ and as such are elements of federal law.

CHAPTER 2: ALTERNATIVES

Regulating Commercial Dog Walkers will Require Coordination with Adjacent Jurisdictions

Commercial dog walking would be regulated under all alternatives being considered. Various commercial dog walking businesses frequently use Area B to exercise dogs under their care. While the Trust currently does not require a permit for commercial dog walkers, such activity is subject to regulation under 36 C.F.R. 1005.3. Changes in NPS park policy that would restrict or prohibit use of Area A by commercial dog walkers would likely significantly increase the number of dogs brought into Area B by these businesses. This impact on Area B should be identified and evaluated. In addition, it should be acknowledged that creating and implementing an enforceable policy for commercial dog walking in the Presidio will require close coordination with the Trust and other surrounding jurisdictions to ensure consistency of the permitting process and the avoidance of unintended spillover effects.

CHAPTER 3: AFFECTED ENVIRONMENT

GGNRA Visitation Trends are Inflated due to Inclusion of Area B

The DEIS makes clear that Area B is not included in the dog management study area. However, park visitation information provided on pages 266 to 270 includes visitors to Area B. The entire Presidio currently accounts for approximately 29% (approximately 4.0 million) of the mean annual visitation GGNRA-wide (approximately 14 million). Visitor counts should recognize Area B's contribution to the GGNRA visitation, or be subtracted

from the total.

CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

The Cumulative Impact Scenario Fails to Acknowledge Trust Actions under the PTMP

In determining what projects are necessary for a cumulative impacts analysis, the NPS should focus on the extent to which information is "relevant to reasonably foreseeable significant adverse impacts" and is "essential to a reasoned choice among alternatives." The DEIS on page 290 states that the actions, projects, and programs listed in Appendix K were compiled for the cumulative impacts analysis. However, most of the listed projects are irrelevant to decisions about the dog management project, and their listing adds no value to the analysis. Only a handful of the listed plans and projects are discussed in the cumulative impacts of the project for each resource topic. As encouraged by the CEQ,⁹ the cumulative impacts analysis should only "count what counts."

The Trust is implementing a number of historic building rehabilitation, landscape improvement, and habitat restoration projects under the Presidio Trust Management Plan. These projects include rehabilitation and reuse of approximately 100,000 square feet of space in 10 buildings along the edge of the proposed regulated off-leash area (ROLA) at Crissy Airfield, restoration of the Quartermaster Reach ecological corridor draining directly into Crissy Field Marsh that will allow expansion of the marsh, and new trails (including the Tennessee Hollow, Park, and Presidio Promenade trails) that will provide better connections from Area B to Crissy Field. These projects are highly relevant to the cumulative impacts analysis but are conspicuously absent. It is simply not possible for the DEIS to provide an adequate analysis of Crissy Field cumulative impacts without consideration of Trust projects, as they have and will continue to affect shoreline activities in Area A, including dog management, and will incrementally contribute to the cumulative effect on resources affected by the project. The cumulative impact analysis must incorporate information based on Trust planning and NEPA documents, notably the PTMP. Including relevant Trust projects would have added value to the cumulative impact analysis and would be more true to the letter and intent of CEQ's NEPA regulations. The addition of Trust projects to the analysis would also have been an easy task had the NPS consulted with the Trust.¹⁰

Impacts on Area B Soils are Underestimated

The impact analysis on page 369 of the DEIS assumes that no impacts on soils in adjacent lands would occur under the preferred alternative since ROLAs would be provided at Crissy Field. The Trust disputes this

conclusion. Tighter restrictions, including ROLAs, would inevitably increase visitation by dog walkers in other areas. Those areas in Area B that are frequented by dog-walkers, such as the Mountain Lake and Ecology Trails, would experience increased dog activity which would increase impacts that would be both long term and readily apparent.

Impacts on Area B Water Quality are Overlooked

The discussions on pages 503 and 509 of the DEIS conclude that there would be no indirect impacts on water quality in Area B since ROLAs would be provided at Crissy Field and Area B does not have beaches. Fewer areas available for dogs and more restrictions at Crissy Field and Baker Beach would likely result in an increase in dog walking activity in Area B. In addition, although Area B does not contain beaches, it does have important water bodies including Mountain Lake and Tennessee Hollow watershed, which are undergoing restoration. The areas surrounding these water bodies are already used by dog walkers. Indirect impacts on water quality from increased dog walking should be analyzed.

Known Impacts on Area B Vegetation are Summarily Dismissed

On page 657 of the DEIS and elsewhere in the vegetation section, the analysis concludes that "indirect impacts on coastal scrub/chaparral/grassland vegetation in adjacent lands from increased dog use would be negligible because it is unknown where and to what extent coastal scrub/chaparral/grassland vegetation in adjacent parks could be affected by dogs." This superficial analysis is not the "hard look" necessary to satisfy NEPA's requirements.¹¹ Put more simply, impacts cannot be deemed negligible because the analysis has not been done. Fortunately, site-specific information on native plant communities within Area B is readily available, mapped on page 14 of the PTMP, and retrievable through the Trust's geographic information system upon request. Several of these native plant communities, including serpentine and coastal prairie grasslands, represent the largest intact communities of their kind in the Presidio. Dismissing indirect impacts on important plant communities in Area B simply because "the Presidio does not allow off-leash dog walking" is erroneous and misguided. Even if compliance with the leash laws were assumed, impacts would still occur along trail corridors, affecting plants that grow in the soils immediately adjacent to the trails. Thus, even indirect impacts would be measurable, perceptible, and important to address.

Impacts on Area B Visitor Experience are Discounted

On page 1407, the DEIS candidly states that "some alternatives include restricting or eliminating dog walking at a particular site. In these cases, there is a potential for dog walkers currently using those sites to move to a

different location in GGNRA or to a location outside the park so that they can continue to exercise their pets." Nevertheless, the analysis on page 1480 of the DEIS concludes that there would be no indirect impacts on visitor experience in Area B despite a substantial reduction of off-leash area at Crissy Field. The Trust disagrees with this conclusion. We strongly believe that enhanced restrictions at Crissy Field will boost dog walking activity in Area B. Similarly, the DEIS assumes on page 1494 that dog owners and walkers would continue to use Baker Beach for dog walking activities even though leashes would be required, because some visitors enjoy the experience of dog walking at the beach. The DEIS concludes that no indirect impacts on visitor experience in Area B would be expected, since Area B does not have beaches. The Trust maintains that a substantial number of dog walkers at Baker Beach would seek other areas in the Presidio where they might face a lesser enforcement threat of the leash law than on the highly visible Baker Beach. Visitor incidents related to dogs in Area B would also be expected to increase. Some current visitors to Area B may begin avoiding areas of the park due to the presence of more dogs.

Impacts on Trust Operations Must be Considered

The U.S. Park Police (USPP) San Francisco Field Office with headquarters at Building 1217 in Area B is responsible for law enforcement at the Presidio. A substantial portion of funding¹² for law enforcement programs within both Areas A and B comes from the Trust through an interagency agreement. Law enforcement activities pertaining to dog management are costly and include resolving conflicts between dog walkers and other user groups, giving written or verbal warnings or issuing citations to dog walkers not complying with the current regulations, educating the public on dog management regulations, and preparing and filing reports related to dog and visitor incidents. Where violators are prosecuted, USPP officers may have to take paid duty time to appear as witnesses. As noted in the DEIS, changes in NPS dog walking policies over the years, court decisions regarding dog walking in the NPS-managed areas of GGNRA, and public confusion due to both these changing circumstances has led to varying levels of enforcement in the Presidio. The public confusion in Area A and current relaxed regulations on NPS-managed GGNRA lands has made enforcing the Trust's on-leash dog walking regulation in Area B difficult.

An increase of dog-walking activities in Area B would also result in higher operation and maintenance costs for dog walking areas, e.g. installation of added protection measures such as fencing, additional education (signs, brochures and public meetings), and response to more visitor concerns, questions and complaints. Noncompliance citations and visitor conflicts would increase, requiring greater USPP capacity to implement the NPS and Trust dog management regulations in a consistent manner.

The estimated costs to complete the tasks necessary to implement the NPS dog management plan provided on page 1569 of the DEIS do not take into account the Trust's additional costs or demand on resources. The DEIS should assess the impacts of the project on the Trust's annual operating budget. The evaluation should include financial requirements associated with short-term impacts that would occur during the initial public education period and the law-enforcement activities in Area B once the NPS begins the implementation of a new regulation. The additional operating and capital costs associated with long-term effects on Trust operations should also be considered.

APPENDICES

Area B Omitted from List of Adjacent Dog Use Areas

Appendix J of the DEIS lists over 140 parks/sites within and adjacent to NPS-managed GGNRA lands, and provides information such as dog use areas and leash requirements. Many on the list only allow on-leash dogs, such as Muir Beach, Marin Municipal Watershed District lands, and Glen Canyon Park in the city. However, no mention is made of Area B, even though it contains approximately 20 miles of trails and 685 acres of developed areas for on-leash dog walking directly adjacent to Crissy Field and Baker Beach. To correct this error, the following should be provided on page J-9:

Dog Use Area: Presidio Area B

Location: See GGNRA Map

On-Leash/Off Leash: On-Leash

Additional information: http://www.presidio.gov/NR/rdonlyres/A26635BC-AE79-4EDA-846BBF5700B926A5/0/PresidioTrailsMap_SEPT2010.pdf

Source: <http://www.presidio.gov/NR/rdonlyres/E5138135-A64D-4228-9912-C69CAF92CBBE/O/CFR1002.pdf>

No Trust Projects Represented in List of Actions Considered for the Cumulative Impacts Analysis Appendix K lists more than 80 projects and actions within and outside the boundary of the GGNRA that were conceivably compiled for consideration in the cumulative impact analysis. Only a small number of the listed projects incrementally contribute to the cumulative impacts on resources affected by the dog management project, and fewer still are discussed in Chapter 4 of the DEIS. Furthermore, only 2 of the actions are Trust activities (the Presidio Vegetation Management Plan and the Presidio Trails and Bikeways Plan), and these are presumably listed

only because the NPS was directly involved. Despite the questionable listing of such a broad array of projects, no other Trust projects or actions, including the PTMP, the Main Post Update to the PTMP, Quartermaster Reach, and the Main Parade, are represented in the appendix. As discussed above, the inclusion of Trust actions occurring in proximity to Area A is necessary to permit a complete analysis of cumulative effects of the project. The NPS should review the Trust's planning and environmental documents¹³ to determine those actions that contribute to significant cumulative effects of concern, and add them to the list in Appendix K for consideration in the analysis.

MAPS

Vicinity Map Should Acknowledge Jurisdiction of Trust in Area B

Map 1 in the Maps section of the DEIS indicates the boundaries of various NPS units, state, regional, county and city parks, and other land management agencies in the greater region addressed by the dog management plan. However, the Trust-managed portion of the Presidio (Area B) is left blank, leaving it unclear to the reader as to which agency has jurisdiction over the area. For clarity, the NPS should treat Area B the same way that the GGNRA northern areas (managed by Point Reyes National Seashore) are shown: with a leader line (arrow) followed by the text "Presidio Area B is managed by the Presidio Trust."

FOOTNOTES: 1 Letter of September 20, 2006 from Craig Middleton, Trust Executive Director to Brian O'Neill, former Superintendent, Golden Gate National Recreation Area. Re: Request for Written Comments on GGNRA Dog Management Plan/EIS. 2 CEQ NEPA Regulations Section 1508.8(b). 3 CEQ Forty Most Asked Questions No. 14b. 4 NPS Management Policies 2006, Section 2, Park System Planning. 5 See CEQ Forty Most Asked Questions No. 23a, Conflicts of Federal Proposal With Land Use Plans, Policies or Controls, which goes on to say: "comments from officials of the affected area should be solicited early and should be carefully acknowledged and answered in the EIS." 6 In fact, the first mention of any regulations on dog walking in Area B appears on page 369, and the oblique reference is only provided to rationalize a finding of no impact to geology and soils. 7 In the notice of its intention to establish the Negotiated Rulemaking Advisory Committee for Dog Management at GGNRA published in the Federal Register on June 28, 2005, the NPS erroneously reported the Trust as a committee member (since respectfully withdrawn) that would represent "the interests of local government." 8 16 U.S.C. 460bb appendix. 9 CEQ Handbook "Considering Cumulative Effects under the National Environmental Policy Act," January 1997. 10 The CEQ Handbook advises that the "first step in identifying future actions is to investigate the plans of... other agencies in the area." 11 See 40 C.F.R. 1502.22, Incomplete

or unavailable information. 12 \$4.3 million, which represents 42% of the total USPP budget GGNRA-wide in FY2010.

Correspondence ID: 4391 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Melinda Loew

Responsible dog owners are good free security to watch out for our parklands.

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Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Kathy Schoendorf

I have been a dog owner all my life and feel this place should continue to be open for dogs.

Correspondence ID: 4393 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: To: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

From: Matthew Zlatunich San Francisco, CA 94118

Dear Superintendent Dean,

I write in support of adopting a Dog Management Plan for the GGNRA. I have been following this issue for many years, have reviewed the Draft DEIS and attended one of the public open house sessions.

My interests in the GGNRA are as a lifelong resident of San Francisco, a frequent park visitor and a volunteer participating in wildlife monitoring and stewardship activities. I enjoy the park for the unique opportunities to

experience the natural and cultural resources and I appreciate the values of our National Park System.

I concur with the assessment that the natural and cultural resources and park visitor experiences have been and continue to be negatively impacted by the presence of substantial quantities of domestic dogs, both on-leash and off-leash, within the GGNRA. On many occasions my own park experiences have been negatively affected by the presence of dogs. I have had personal conflicts with dogs and their owners/guardians as well as being witness to conflicts between dogs and wildlife.

While I am supportive of many aspects of the Preferred Alternative, I have the following comments to offer:

General Comments

Commercial dog walking should not be allowed. Commercial dog walking does not relate to the purpose and mission of the National Parks. Commercial dog walking provides no service or benefit to park users, has negative impacts on park resources and park visitors, and serves only for the capital gain of private enterprises at the expense of the American public.

Commercial dog walking will require additional annual expenditures for administering and overseeing a permitting process, additional law enforcement, additional resource maintenance and additional public relations.

The DEIS estimates that over 1000 dogs will be commercially walked within the GGNRA daily (p. 63 p. 276). Commercial dog walkers, with up to six dogs, will negatively impact the experience of park visitors on trails and in other areas of the park. If permitted, commercial dog walking activity will increase within the GGNRA and will displace park visitors, of all legitimate user groups, from areas of the park. Commercial dog walkers will dominate the ROLAs, displacing other park visitors. Commercial dog walking vehicles will occupy parking spaces resulting in fewer spaces available for park visitors. If allowed, commercial dog walking operations will have a dominant presence in some areas of the park thus affecting the overall character and ambiance of those areas.

Currently, commercial dog walking is not permitted within the GGNRA or any other National Park unit and there is no justifiable reason to do so. The NPS is well within the scope of its management directives to not allow commercial dog walking and I support this position.

Off-leash areas should be well defined and be contained by a physical barrier. It can be assumed that off-leash dog recreation will be the primary

activity within any established ROLA. ROLAs should be well distinguished by physical barriers and adequate signage so that all park visitors can choose whether or not to enter the area.

Park visitors should be limited to one dog per visitor. On trails, visitors with more than one dog have a wider space requirement and have the potential to impact other park visitors by impeding their progress along the trail. In ROLAs, it is not practical to allow voice control of more than one dog per person. With few exceptions, dog handlers are not capable of managing more than one off-leash dog at a time.

The proposed compliance percentage of 75% is too low. Given that many hundreds of dogs are walked within the GGNRA daily, a 25% non-compliance tolerance would create a situation where park resources are significantly negatively impacted. The expectation should be that non-compliance is a rare occurrence and the compliance strategy should reflect that in its standard. The standard of compliance should be the same as for any other park rule or law. An acceptable rate of compliance is somewhere near 100%.

A simple and effective reporting system should be established. The dog management plan should include a means by which park visitors can easily and effectively report non-compliant behavior. Park visitors are sometimes reluctant to report observed violations due to the time involved in making the report. A public reporting system should be incorporated into the plan that will be user friendly and workable. Such a system should require only a few moments of time and be an effective documentation of the violation.

The plan does not provide an adequate amount of hiking trails and picnic areas where visitors can enjoy a dog-free, National Park quality experience. Within San Francisco, the plan provides no significant area where park visitors can spend the day hiking and/or picnicking in a dog free environment. A solution to this problem would be to designate all of the coastal bluff areas, from the Golden Gate Bridge to and including Baker Beach, as a dog-free zone.

Wildlife viewing is a popular activity throughout the GGNRA. Wildlife viewing should be included as a visitor activity for Crissy Field. (p. 276 & table 9). Snowy Plovers - Nesting records. The DEIS states that there is no record of nesting (p.1240). However, there are records of bird and egg specimens collected during nesting season. Grinnell, 1932, identifies the Presidio as the type locality for the Snowy Plover with a collection date of May 8, 1854, a date that falls within the known nesting season for the species. Also, Smithsonian Institution collection data documents an egg specimen from San Francisco. See

<http://collections.nmnh.si.edu/search/birds/>

Potential nesting site. The DEIS fails to acknowledge that the USFWS Snowy Plover Recovery Plan has identified Crissy Field as a potential expansion site for snowy plovers; see USFWS Recovery Plan pp. 43/44.

Natural & Cultural Nexus. The Presidio of San Francisco is the type locality for the Snowy Plover, collected by Lt. William Trowbridge (Army Corps of Engineers, U.S. Coastal Survey), on May 8, 1854 (Grinnell, 1932). Trowbridge is also responsible for construction of the Golden Gate Tidal Gauge, which began operation in June of 1854 (Nolte, 2004). Given the location of the tidal gauge, it is quite possible that the type specimen was collected from what is now the Crissy WPA. Species of Concern - The DEIS does not fully describe the sensitivity of some habitat areas including Ocean Beach and Fort Funston. The plan considers species listed under the Federal and State ESA's but does not sufficiently describe non-ESA species of concern as listed by the IUCN, the American Bird Conservancy, National Audubon, and locally known species of concern. Species of local concern include:

Allen's Hummingbird Black Turnstone Brant Bryant's Savannah Sparrow
Burrowing Owl California Thrasher California Quail Clarks Grebe Elegant
Tern Heermann's Gull Hermit Warbler Loggerhead Shrike Long-billed
Curlew Long-eared Owl Marbled Godwit Northern Harrier Nuttall's White-
crowned Sparrow Nuttall's Woodpecker Olive-sided Flycatcher Pelagic
Cormorant Red Knot Sanderling San Francisco Common Yellowthroat
Short-billed Dowitcher Snowy Plover Surfbird Thayer's Gull Tricolored
Blackbird Varied Thrush Wandering Tattler Western Sandpiper Whimbrel
Wrentit Yellow Warbler

The EIS should estimate the actual number of incidents that occur within the GGNRA. Table 6 (p. 230) indicates the recorded incidents involving dogs in 2007 and 2008. It is stated that these numbers of incidents of visitors not complying with dog walking regulations is not equal to the number of actual violations occurring at the park. Being that many violations occur which are not observed or un-reported, some estimate of the total amount of violations should be included in the EIS such that each documented violation would be representative of a certain amount of actual violations. Sites Specific Comments

Ft. Mason - I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Field WPA - The DEIS indicates that the east boundary fence will be relocated 200 feet eastward at a position 900 feet from the NOAA pier (p.

60). The language of the plan should allow the National Park Service flexibility in determining the exact location of the fence and consideration should be given to the visual penetration effect as well as the geographical conditions of the immediate area.

Under the preferred alternative, off-leash dog activity directly adjacent to the east boundary fence will pose a visual threat that will penetrate into the Wildlife Protection Area, effectively rendering a portion of the eastern WPA as non-viable habitat during daytime use hours. Given this concern, the fence should be placed a reasonable distance eastward, beyond the actual 900 foot border line, to allow for an adequate buffer zone.

Additionally, the geography of the area of fence placement is somewhat complicated by non-uniform conditions which include a variety of substrates, varying elevations, several lobes of fenced dune habitat areas, and a variety of pedestrian pathways. Consideration should be given to all of these conditions and fence placement should accommodate ease of pedestrian traffic flow while maintaining adequate protection of the WPA.

When installed, the fence should extend to the water at extreme low tide.

Crissy Central Beach - The Central Beach ROLA should be fenced and gated. Fences at the west and east ends should extend to the water at extreme low tide. Adequate buffer zones (-300ft) should be included beyond the west and east boundary fences to protect the WPA and the lagoon outlet from the influences of excessive dog play activity. Access points from the promenade should be gated. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Crissy East Beach - Fencing should be installed to protect the lagoon outlet zone. Outlet areas from bodies of water into bays or oceans are of high habitat value. The outlet zone should be included as part of the protected lagoon area and similarly fenced.

Crissy East of the Lagoon - The Freshwater Swale should be designated as a no dog zone.

Crissy Promenade - I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Airfield - The foot paths that cross the airfield are multi-use trails and should be designated as on-leash areas. Allowing off-leash dogs on the

airfield trails will lead to user conflicts.

The airfield ROLA should have some type of physical barrier along the boundaries. A physical barrier will clearly define the ROLA area. Clearly defined boundaries will maximize compliance and minimize conflict. Consider a movable barrier that can be set up and taken down as needed. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

The eastern portion of the airfield should be a no-dog area. The Crissy airfield attracts a wide variety of grassland bird species, including rare vagrants, and is a popular venue for wildlife viewing.

The following bird species have been observed using the Crissy Airfield as a foraging and/or roosting habitat in recent years: Canada Goose Greater White-fronted Goose Snow Goose Cackling Goose Mallard Red-tailed Hawk Cooper's Hawk American Kestrel Great Blue Heron Great Egret Cattle Egret Killdeer Black-bellied Plover Pacific Golden Plover Black-necked Stilt Least Sandpiper Wilson's Snipe Barn Owl Northern Flicker American Crow Common Raven Black Phoebe Say's Phoebe Homed Lark Barn Swallow Bank Swallow Cliff Swallow Northern Rough-winged Swallow Tree Swallow Violet-green Swallow American Robin European Starling Red-throated Pipit American Pipit Yellow-rumped Warbler Song Sparrow White-crowned Sparrow Savannah Sparrow Vesper Sparrow Clay-colored Sparrow Lapland Longspur Western Meadowlark Brewers Blackbird Tricolored Blackbird Red-winged Blackbird Brown-headed Cowbird House Finch American Goldfinch Lesser Goldfinch House Sparrow

Ft. Point - I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system. Baker Beach - The Preferred Alternative for Baker Beach is problematic for several reasons. Splitting the beach into leash-only and no-dog areas will lead to confusion, non-compliance, visitor conflict and continued management problems. Furthermore, allowing dogs near the creek outlet, an area often used by shorebirds, will increase the potential for wildlife conflicts. As a means of eliminating these problems and of creating more opportunities for visitors to enjoy dog-free National Park experiences, I suggest designating the entire Baker Beach area as a dog-free zone.

Lands End - I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Sutro Heights Park - I support the Preferred Alternative with the following

changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Ocean Beach - I support the Preferred Alternative for Ocean Beach. To improve upon the Preferred Alternative, I suggest using symbolic fencing and adequate signage to delineate the south border of the ROLA. A simple post and cable fence could be placed along the border from the sea wall to the plover sculpture. A well defined border will help to reduce compliance problems and visitor conflict. Additionally, I suggest changing the name "Snowy Plover Protection Area" to "Wildlife Protection Area". A designation of Wildlife Protection Area would be inclusive of all wildlife species that use the beach habitat area.

Ft. Funston - I support the Preferred Alternative for Ft. Funston with the exception of allowing dogs on the beach. To improve upon the Preferred Alternative, I suggest not allowing dogs on the beach. The beach at Ft. Funston is used by a variety of shorebird species. Allowing dogs on the beach will result in dogs chasing shorebirds, which is not appropriate in a National Park. I support installing a fence, with access gates and adequate signage, along the border of the ROLA north of the main lot. A borderline fence will clearly delineate the boundary of the ROLA and will minimize compliance problems and visitor conflict. Signs should be posted that clearly identify the area as an off-leash dog play area and that state the voice and sight control rules. Additionally, I suggest aggressively restoring the coastal scrub habitat throughout Ft. Funston. Plant and animal species, as well as park visitors, have been displaced from Ft. Funston over time as dog play activities have increased. A proactive effort must be made to bring back the visitors who are interested in proper stewardship of this area of the park.

Grinnell, Joseph. 1932. Type Localities of Birds Described from California, University of California Publications in Zoology, Volume 38, No. 3, pp. 243-324. Nolte, Carl. 2004. San Francisco Tides of History, San Francisco Chronicle, June 28, 2004.

Correspondence ID: 4394 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the

plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Kim Wernicke Dog owner

Correspondence ID: 4395 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

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We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite

and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Ted Wegner

Correspondence ID: 4396 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Letter

Correspondence: Frank Dean, General Superintendent Golden Gate National Recreation Area
Re: Draft Dog Management Plan, Draft Environmental Impact Statement
May 2011 Dear Superintendent Dean,

My name is Karen Moise, age 62, and I am a practicing and certified Adult Nurse Practitioner, working for a large health maintenance organization in the Bay Area. I have worked in San Francisco and Marin County for the past 30 years. I have been a home owner in San Francisco for the past 23 years and suffer some chronic physical disabilities that require custom orthotics in order to walk. I also have frequent visits from my sister and her partner who have developmental disabilities and wear orthopedic braces. This doesn't stop us from meandering through Fort Funston or Chrissy Fields with my two active border collies. Our walks are slow but the dogs get their exercise retrieving balls or discarded plastic bottles (which we eventually recycle). They are always under voice or whistle control due to extensive sheepherding training. We have a grand time talking with other folks of all ages and interests. I'm not sure how we would survive emotionally or continue getting this physical exercise if these parks were closed to off-leash dogs. I know that I would return to work grouchy and rusty in the joints. My dogs would become more irritable as they do when they are forced into the smaller crowded city parks with pushy animals. My sister and her boyfriend would be saddened and would not understand.

Working in the mental health arena, I am very concerned with the impact of the Preferred Alternative on the wellness of our diverse community of dog-people. Which brings me to the details of the Draft Environmental Impact Statement for a new Dog Management Plan, which I frankly find bewildering. Why would you want to limit this healthful form of recreation that allows us with the problems of aging and handicaps and down-sized finances to socialize and exercise and utilize the outdoors with our canine families?

This is not a wildlife preserve akin to Yellowstone. It is an urban green space. What happened to your mandate to provide recreation to the people

of the Bay Area? What happened to the federal plan for "Healthy People Healthy Parks?"

This four- inch thick tomb (paid for with our tax payer dollars) lacks scientific studies and statistical documentation that could back its numerous assumptions.

One large assumption is that both the environment and the endangered species "could be" threatened by our dogs. These parks are not designated as critical habitat. The Snowy Plover doesn't nest or breed at Fort Funston or Ocean Beach. The endangered Bank Swallow burrows near the top of the cliffs at Fort Funston where no dogs can possibly go. These birds are probably more upset with the paragliders that are not being forced out of the GGRNA. As with most of the wildlife that can tolerate our busy urban spaces, it is the bicycles and the surfers and the people that are strange and frightening; not the dogs which appear quite like normal predators to them. (Just another coyote). And it is the hikers, bikers, and horses that cause erosion of the sand dunes far more effectively than the the canines due to the sheer size and continuity of their footprints. And it is the lawns and golf courses near the headlands that over-use the water table and pollute it with pesticides. The dog waste which we try to pick up is at least biodegradable. In the early 90's I helped remove ice plant from the dunes at Fort Funston to be replaced by the native plants which are thriving hardily. They are protected well from the encroachment of people and dogs by your fences and are not suffering. You could improve this protection by using downed logs around the bottom of the fences which would increase habit for lizards and insect larvae and be a better perimeter marking for the canine population which doesn't recognize wire or thin wood as a boundary. This would also protect the newer naturalized habit at Chrissy Fields.

You worry about safety in the GGRNA. I first wondered if you were concerned about our pets falling over the cliffs at Fort Funston. That couldn't be the case because it could be so easily solved by planting native bushes and creating hedging that could erode without much loss to the Parks. If you mean dog bites and aggressive attacks on visitors, there is vague evidence for 2% of the safety problems involving our canines. 98% of the danger comes from human crime and tourists being washed off the rocks in their naivete about the ocean waves. In fact I would worry if you eliminate dogs from Ocean Beach or Fort Funston or Baker Beach or Chrissy Fields where car break-ins do occur now. These would probably escalate to robberies with injuries to people and certainly the drug use would increase. People with dogs act as a deterrent. (30 years ago when I would visit the City and it's beaches, there was constant illegal drug use during even the daylight hours and we were afraid to walk in bare feet due to the number of syringes and needles thrown about. We also saw very few dogs).

There is no word in the Draft Management Plan about the effects on the local City Parks of these proposed limitations on canines in the GGRNA. We can be guaranteed that the numbers of dogs will multiply exponentially and the resultant crowding will cause behavior problems, human conflicts, and then erosion which will truly impact the quality of life of the entire urban community. This would also be a cost shift to the cities and counties.

The absolute worst part of this Plan is the Compliance-based Management Strategy which allows you to automatically and permanently discard the whole plan and restrict dogs from the GGRNA. This is draconian-no hearing, no judge, no evidence needed. What kind of democracy does this represent?

In summary, I oppose the Proposed Alternative and want to see an expansion of the current 1979 Pet Policy. All new lands acquired by the GGRNA should have shared use with people who recreate with canines under voice control. Further extension of signage and use of natural materials to restrict sensitive areas could be combined with education to enhance the experiences of all residents and visitors. The Park could actually increase its budget by charging groups to rent space for dog training . (Not just Good Citizen Canine Behavior Classes and Obedience, but also Search and Rescue, Hospital Visitation Dogs, Service Dogs, etc.) My family, my neighbors and I will be watching your progress closely and communicating with our elected officials at all times.

Yours in health,

Karen Moise San Francisco, CA. 94112-2146

Correspondence ID: 4397 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Anne O'Donoghue

I understand about the protection if the birds is important but I don't feel the dogs jeopardize their habitat.

Correspondence ID: 4398 **Project:** 11759 **Document:** 38106
Received: May,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: Greetings Superintendent Dean,

I'm writing to you as a native born Californian that has spent nearly seven decades on or near our wonderful coastline. In my lifetime I have witnessed a nearly five-fold increase in population and the resultant, ever-increasing environmental stress that is felt throughout the state, but disproportionately experienced along the coast. These coastline developmental pressures became so obvious and acute that in 1972 California voters established the Coastal Commission, which gave great hope to those of us that saw the beauty of this resource eroding at an alarming rate.

When I moved from Southern California to San Francisco in 1966 I was shocked and bewildered when I first saw Ocean Beach and I couldn't understand why this stunning resource had been treated with such flagrant disrespect. Even though it was part of San Francisco's Golden Gate Park it seemed to be a place no one really cared about.

Then around the same time that the California Coastal Commission started to offer up a chance to slow coastal development, I heard about the newly formed Golden Gate National Recreation Area, and even though I had no idea what it really was, I did hope that this newly formed entity would also help mitigate some of the coastal damage I had witnessed throughout my life. Over the years I started to notice the positive effects the GGNRA was

having on such places as Ocean Beach, Fort Funston and Crissy Field and I had high hopes for the level of improvement these facilities might eventually receive, and for the most part my expectations have been greatly exceeded. The stunning improvement to Crissy Field was particularly dramatic, especially when contrasted with what the military left behind.

It was only then that it became clear to me just how destructive some previously acceptable activities were having on these newly revitalized parklands. Places such as Crissy Field and Ocean Beach began to reveal their amazing natural value making it clear to me that some formerly tolerated behaviors might finally have to be curtailed.

The history of dog walking in the areas under discussion here are subject to significant contrasts in interpretation, but I think we can all assume that in areas as neglected as these places have been in the past, dogs were but one form this abuse took, and for that reason, dogs didn't stand out as any worse than other forms of neglect. What was happening though was a further entrenching of a sense of entitlement dog walkers took on over those many years of neglect. It is only now that we are witnessing just how embedded this entitlement has become and just how deeply protective dog walkers are of their perceived rites.

As you might expect, dog walkers see little harm to wildlife that they ironically rarely see anyway, just as most environmentalist see significant and demonstrable harm to that very same wildlife. The fact that we are dealing with urban parks seems to indicate to dog walkers that cities aren't the place for endangered or threatened wildlife just as environmentalist struggle to allow endangered species to get a tow hold in damaged, long neglected or compromised areas. Dog walkers rightfully claim that they have been walking their dogs in these areas for many years just as environmentalists try to reintroduce wildlife systems not seen for just as many years. Our recent understanding of interlinking and interdependent ecosystems has broadened the need to protect areas once thought of as disposable, but implementation of such programs is anything but clear-cut.

Many pet owners (including some that consider themselves pro-environment) see their pet as a fully entitled, integral part of their family with all the rights and more as their human caretakers. They generally do not see these domesticated predators as capable of doing any significant harm to wildlife or other undomesticated systems our parks are charged with preserving or enhancing. Dog owners I have talked to see his or her pet as somehow "different" and "special" and they do not feel comfortable depriving them of anything, especially freedom. The family dog has taken on iconic, "Apple Pie" like status and owners can become a bit nonplused and defensive if others do not share those feelings.

Political Pressures

It needs to be acknowledged here that the dog walking community has been very successful in making their point of view heard, especially in and around the city of San Francisco. Our Board of Supervisors have held many public hearings to allow dog owners to vent their anger over this issue and have at times even entertained the idea of reclaiming the lands in question here. It seems that after many years of dogs running free and wild along our local coast, dog owners were not willing to relinquish what they saw as their rights and mounted a boisterous and effective campaign to continue allowing their pets free reign in local as well as federal park lands, and like many others, I was caught unaware of the level of passion that these pet owners could bring to the discussion. As of this writing, all parks in and around the city of San Francisco are de facto dog parks. This is due to a lack of enforcement in city parks and regulatory confusion in the GGNRA.

I fully understand just how powerful the political and public pressure has been on this issue and I fully expect that such pressure will only increase as this process continues, but none of this should distract you from your underlying fundamental responsibilities.

Popular Culture and its Dog Mythologies

The pervasiveness and widely accepted icon status of dogs has a very strong influence over any attempt to control dogs in parks and natural areas. It seems sometimes that next to "Mom and Apple Pie" the image of a dog chasing a bird into the sunset has become the consummate example of American life at its very best. Many television and print advertisers use such images to promote all manner of products from pharmaceuticals to life insurance. If an advertiser is attempting to promote an image of a harmonized healthy life, dogs seem to be the go-to image and wildlife is relegated to the distant, less important background.

It seems that our local major media has also adopted the opinion that dogs are an essential part of healthy life and seems more than willing to ignore the obvious harm they can do. I will include here one example, which came in the form of an illustration that the San Francisco Chronicle used to bolster, some Letters to the Editor that claimed the GGNRA's attempt to control dogs was in fact "criminalizing the dogs".

I wrote this letter (not published) in response to this Chronicle image.

Editor - One of the best examples of just how dire and out of control the dog situation is in the GGNRA was the photograph that accompanied the "Criminalizing the dogs" letters. The caption said, "A dozen dogs are taken for a stroll on the beach at Crissy Field" when in fact there are at least

eighteen dogs that are clearly on an explosive, free ranging romp. What you don't see is any hint of wildlife. You will also not see anyone that is rationally apprehensive of large groups of strange dogs or anyone legitimately requiring the assistance of a guide dog. It's imperative that GGNRA management heed their legal mandate and realign this park with it's underlying intent.

Personal Experiences and Useful Comparisons

Although I live in San Francisco, I do most of my daily recreating on San Bruno Mountain, a California State Park that is administered by the San Mateo Parks system. Like all San Mateo Parks, there is a strict no dog policy on San Bruno Mountain, and I think the history behind this rule offers up some useful comparisons relevant to this discussion.

After more than a hundred years of contentious land use wrangling, San Bruno Mountain State and County Park was dedicated on May 2, 1986. The fact that pets have never been allowed at any of the San Mateo County Parks meant that San Bruno Mountain was now a no dog park. Just like much the GGNRA, San Bruno Mountain has a long history of extreme abuse such as off road motorcycles and extensive trash dumping, and of course the people that lived near this massive open space used the area to recreate their dogs. Also like the GGNRA, the fact that the rules had changed did not immediately result in a change in dog walking behavior. Dog walkers kept coming into the park, either claiming ignorance of the rules, or in some cases simple defiance. Many others that I talked to claimed that since they lived there before the park was established, they felt exempt.

Several years ago I wrote an essay published by San Bruno Mountain Watch that I called "My Dog Loves It Here". The title came from a comment a woman made to me when I informed her that "dogs are not allowed" on San Bruno Mountain. I have been working with park personnel on these issues for many years now, and slowly we have seen a significant increase in compliance. The main reason for this improvement is really quite simple and can be attributed to much better signage and enforcement. Even though the San Bruno Mountain no longer has any full time on site personnel, they do have rangers do enough periodic drive-throughs to discourage most people from bringing their dog into the park. I always talk to people with dogs, some of which become belligerent, but most are never seen a second time. I would say that compliance is now quite good, with a vast improvement seen in the last five years. I would call these efforts a success story and I still hope to see a similar outcome for the GGNRA.

GGNRA Draft Dog Management Plan

I have to confess that I was in complete shock when my mailman dropped

this large box on my front step and the shock continued after discovering the bulk that was inside. The massiveness of this document is clear evidence of just how out of control this discussion has become. When I mentioned the size of this report to an out of town friend they said, "all that over dogs?" Even though this discussion is clearly about much more than dogs, the term overkill still comes to mind - so lets take a brief look at what's inside.

I suspect that you will have already figured out that I would want the most restrictive options possible, but I'm pragmatic enough to know that I will not get everything I want. Of all the options you present, I much prefer Alternative B: NPS Leash Reputation - it is simple and already completely understood by the National Park Service.

Failing that, there are several issues that urgently need your attention, most of which were either ignored or sidestepped by the Plan/DEIS.

? It seems to me that you have abandoned the very essence of a National Park by allowing on-leash dogs on almost every trail in San Francisco. There are dozens of reasons this is intolerable including the fact that this summarily excluded any visitors that have a healthy apprehension of dogs. There is also no chance to observe undisturbed nature along a trail if dogs are present. More trails in San Francisco must be completely closed to dogs.

? It is my opinion that off-leash dogs are the antithesis of the "preserve and protect" NPS mandate and should not be allowed. If such activities are being considered, off-leash areas must be fenced or well-marked and enforced to provide a clear boundary. If physical barriers would be detrimental to the park ecosystem or aesthetically displeasing, then no off-leash area should be considered in that location.

? The targeted Park Service's compliance rate of 75% is far too low and would send the wrong message to dedicated scofflaws. The environmental damage that will inevitably be done by 25% of our burgeoning pet population is completely intolerable. The Park Service needs to plan for maximum compliance through vigorous enforcement, which over time will build toward a high compliance rate. Park users have a right to demand that park regulations be enforced.

? There is absolutely no place in the GGNRA for any commercial dog-walking activity.

? I'm completely bewildered that there is no mention in any of your plans of people with disabilities such as people that may use a guide dog. I know that Guide Dogs for the Blind has made their concerns known to you but I don't see any mention of their legitimate needs. Off-leash dogs are a significant challenge for Guide Dog users and they must avoid any place where off-

leash dogs are known to roam. These concerns must be addressed in your final decision.

? Beyond ignoring park users with severe disabilities, you have also ignored a much larger constituency that includes the frail, the elderly, and parents with small children and people who legitimately fear dogs or those who simply want a dog-free experience in their recreation. It is the responsibility of the NPS to protect park resources for all its users, not to cater to pet owner preferences.

I will add that protecting natural areas that happen to be close to urban congestion is even more important as a buffer to human influence. I would also add that endangered species aren't the only wildlife in need of protection ' all birds and wildlife are in fact the proverbial "canary in a coal mine". Future generations are relying on you to save all that will fall if human pressure is allowed to set the agenda. While dogs may be an important parts of our families and communities, they are just one species that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive. The parks must be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.

Wilderness is not the wide-open spaces, but the wild things that fill it.

Sincerely,

M. Bruce Grosjean

"We need another and a wiser and perhaps more mystical concept of animals. Remote from universal nature, and living, by complicated artifice, man in civilization surveys the creature through the glass of his knowledge and sees thereby a feather magnified and the whole image in distortion. We patronize them for their incompleteness; for their tragic fate of having taken form so far below ourselves: And therein we err, and greatly err. For the animal shall not be measured by man. In a world older and more complete than ours they move, finished and complete, gifted, with, extensions of the senses we have lost or never attained, living by voices we shall never hear. They are not brethren they are not underlings; they are other nations; caught with ourselves in the net of life and time, fellow prisoners of the splendour and travail of the earth " Henry beston, The Outermost House

Correspondence ID: 4399 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter

Correspondence: I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan.

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

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We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely, Ziv Gigus

The peninsula has very few off leash areas. The areas under the GGNRA are part of a recreation space, not a park, and could accomodate off leash area as are currently available.

Correspondence ID: 4400 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Letter

Correspondence: JAN LASSETTER SAN FRANCISCO, CA 94117

May 22, 2010

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201. Fort Mason San Francisco, CA 94123-0022

Dear Superintendent Dean,

First let me introduce myself. I am a 74-year-old avid dog person and nature

lover. I love ALL nature and being able to enjoy many aspects of it is very important.

We are all creatures of God and all must share the planet equally. I do not believe in singling out one creature over another. Urban areas must be treated differently than wild areas. Wildlife should not be given quarter over domestic animals/life in the middle of an urban area. If that were the case, then none of us could live here.

I belong to the Marine Mammal Society, The Wood River Land Trust, World Wildlife Fund, Best Friends Animal Society and Crissy Field Dog Group to name a few.

I take my golden retriever to Ocean Beach and Crissy Field at least once a week. Having a water dog means having to be able to access water. Wacko loves to swim and infact, it is part of his well-being. As a responsible dog owner, I pick up after him and keep him under voice command. It is very important that these areas remain off leash dog walking areas, both for the health and welfare of the dog and of the owner.

Has the GGNRA studied the impact on the natural resources from ALL the other activities that occur in these areas, such as walkers, bikers, kite flyers, runners, picnickers etc. etc. Why has the GGNRA chosen to single out dogs?

Have there been studies done to suggest that the dogs do more damage to natural resources as compared to other activities?

Where there are very sensitive wildlife areas, they should be WELL marked. We responsible dog owners are concerned with preserving our natural resources and need a little direction as to where these areas are. I do not agree with the GGNRAS' current preferred alternative as it restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the 1979 Pet Policy and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. I support Alternative A, the No Action alternative, which would also include " New Lands" within San Mateo County.
Respectfully submitted,

Jan Lassetter

CC: The Honorable Nancy Pelosi United States House of Representatives
235 Cannon House Office Building Washington, D.C. 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street, N.W.

Washington, D.C. 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W.
Washington, D.C. 20240

Correspondence ID: 4401 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean;

I support the Dog Management Plan; with that in mind, I am submitting printed copies of email letters of support that I have already sent to my representatives in Congress.

Sincerely,

Michael Cronbach

Correspondence ID: 4402 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Letter

Correspondence: Half Moon Bay, CA 94019

May 23, 2011

Superintendent Dean Golden Gate National Recreation Area Fort Mason,
Building 201 San Francisco, CA 94123

Re: Draft Environmental Impact Statement for Dog Management on New
GGNRA Lands Dear Superintendent:

Please amend the Dog Management Plan for the Rancho Corral de Tierra
lands to allow for a balanced alternative which includes dogs.

We are neighbors of the Rancho Corral de Tierra POST land which will soon be GGNRA property. We bought our property in large part because it is adjacent to the open space, and built our home 15 years ago in this location where our kids and dog have space to run, play and create. We love the fact that many friends and neighbors enjoy the open space behind our house on a regular basis - they bike, ride horses, walk and run, with dogs on and off leash. We all enjoy the space not just near the neighborhoods that

border the property, but up into the green hills.

From our own experience, we know that parts of the approximately 4000 acres of Rancho land has been used in this way for at least 16 years. Of course, we are most familiar with our little corner of the Rancho. In the larger picture, we know we live in a vacation destination, and many people from around the Bay Area and beyond come to visit our beautiful San Mateo coastside. They bring their dogs to play on beaches and trails, and appreciate the open space the coastside has to offer. In many communities, there are just not enough spaces for people with their dogs, so where the spaces exist, they should be protected. The Rancho has been used for decades by people with dogs, and it still is a scenic, picturesque, lovely, natural place. It seems to me that continued similar use will allow it to continue in this beautiful condition and allow for the public's enjoyment for years to come.

I note that the mission of the GGNRA is the "preservation, unimpaired, of the natural and cultural resources, and scenic and recreation values, of the park for present and future generations to enjoy." And the purpose of GGNRA is "to offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic, and recreational values." Both statements place value on recreational uses. And for many citizens, recreation includes their dogs. It is contrary to the mission and purpose of the GGNRA to ban dogs and therefore that form of recreation by their owners. Since the Rancho Corral De Tierra has not yet transferred to the GGNRA, I must assume that GGNRA has not closely studied the Rancho and the way it's used yet. However, the initial preferred alternative is to not allow dogs at all, which is not a fair and balanced initial stance. It does not take into account the well-being of people with dogs who currently use the space, but favors the few who might prefer no dogs. The study in August 2002 by the Social Research Laboratory states that 76% of those asked whether they agree with National Park Service policy which allows for walking dogs on-leash at most GGNRA sites, either strongly support or somewhat support that policy. This is a clear majority, so why would GGNRA initially allow NO dogs when they take over the land?

I spoke with Superintendent Dean at the public forum in Pacifica, and understood him to say that he plans to issue a compendium allowing for areas of on-leash dogs soon after GGNRA controls the Rancho. He also stated that he is open to working with other organizations to establish an off-leash area. While I appreciate his stated intention, I would prefer that the initial Dog Management Plan be amended to allow for a more balanced alternative, allowing on-leash dogs in the areas that are currently frequently used by dogs and their owners, and allowing for off-leash areas as well. Should the preferred alternative become part of the final plan, I respectfully request that Mr. Dean immediately issue a compendium stating that dogs

will be allowed in certain areas.

Please work with us as your neighbors as we do our best to cooperate with you. We appreciate your existence, and the existence of our National Parks. We want to be able to use and enjoy those lands that our tax dollars are paying to preserve.

Respectfully,

Kirsten Jaeb

Correspondence ID: 4403 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

It was very nice to meet you in Pacifica at the Open House. I am following up to get my comments included in the decision making process for the Rancho Corral de Tierra and to offer my expertise in further planning efforts.

This letter is asking for your support in allowing continued access for dogs in the Rancho Corral de Tierra, soon to be part of the GGNRA. This large property is close to my home in Montara. As you may remember, I am a small animal veterinarian and I have been hiking with my dogs in the local open space area for the last 15 years. This is something I do daily and without it my quality of life would be compromised. Daily walks with my two well behaved dogs is the highlight of my day. In addition to walking our dogs, I often bike ride or ride my horse in this same open space. You can consider me a heavy user of this wonderful resource and I want to emphasize how well dog walkers, horseback riders, cyclists, and hikers get along and respect each other. The Montara Dog Group has encouraged responsible dog walking by starting a volunteer organization of people who remove dog waste from the mountain and by promoting leash protocols that respect all users in the park.

I encourage you to adopt Alternative E from the GGNRA Draft Dog Management Plan. This will allow continued on leash dog walking with off leash to be considered if certain criteria in the plan are met. Their proposed Alternative prohibits dogs from an area where people have been walking them for 50 years. This is unacceptable.

The reasons I want this alternative are:

Dogs do not harm the open space.

This is a very small percentage of GGNRA, yet a huge part of life in Montara. In fact, one of the reasons we moved here from southern California was precisely due to the opportunity to walk our dogs in an open space.

GGNRA is a RECREATION area, and walking dogs is a common form of recreation. As you proceed with revising and modifying the dog plan, please consider including me. I hope you plan to allow dogs based on site specific information for the Rancho. I would also like to see the rules depend on documentation of actual effects of dogs on the Rancho. I am a member of the Montara Dog Group as well as the Sierra Club. In addition to being a veterinarian, my college degree is in Biological Sciences. I do not want dogs to cause any harm, nor do I want to see them restricted without good reason. I am a good listener and I am willing to donate my time to this important issue. For a personal reference, please ask Chris Powell to vouch for me/she and have known each other since we moved to the area and we are bicycling and hiking buddies (when she is in California!)

Thank you for taking the time to listen to me on this critical issue.

Sincerely, Lisa

Correspondence ID: 4404 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 24, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area,
Building 201 Fort Mason San Francisco, CA 94123-0022

Dear Superintendent Dean:

My family and I have lived in Marin for over three decades. We have jogged and hiked every trail on Mt. Tamalpais, as well as the Marin Headlands, Rodeo Beach and Marin Water District. In all those years, we have enjoyed taking our dogs to Rodeo Beach, Fort Funston, Ocean Beach and Crissy Field, as those are the only places they could run off leash. We have trained all our dogs to be good citizens and we remove any pet waste, anywhere we go. Now I find there is a plan in process to make some of our favorite places either leash-only or no-dog areas. This is most distressing.

At the age of 72, I still work in San Francisco but my recreational activities

have been altered because of health concerns. I can no longer run trails or hike. Nowadays we take our dogs to the beach and various dog parks in the area. We have always enjoyed the GGNRA where our dogs can have the opportunity to run on the beaches and at Fort Funston. I have become concerned about the plans to severely restrict off-leash dog walking in GONRA. What I have read in the Draft Dog Management Plan has disturbed me greatly.

There is one major point which is not addressed anywhere in the plan., GONRA is NOT a national PARK. It was not intended to be. National parks have as their intent keeping the wilderness pristine and uncontaminated even by humans for the most part. GGNRA is a national RECREATION area; ergo, it was intrinsically intended as an urban recreation area. Yet the entire plan is written as if GGNRA were a national park and should be subjected to national park rules and regulations. This is very wrong. To put the same restrictions on it as on a national park defeats the purpose of recreation to begin with. National parks are to be preserved so people can go there and see the beauty of nature, walk specified trails and keep things unspoiled Urban environments desperately need recreation areas where people can use the land, play and get exercise. There is a huge difference, and land in an environment as heavily populated as the Bay Area is more important than ever as a place where people can actually enjoy the land, not keep it untouched by man.

Dogs are as much a part of recreation as horses are and their owners should be no more prohibited from recreational lands than horse owners. Urban inhabitants have few places where they can go with their dogs and as a result have even greater need for such places. This plan takes none of that into consideration.

In fact, nowhere in this plan do I see mention of the enhancement of both health and recreational ability of the GGNRA. The plan is written as if it WERE a national park. In which case, all these areas should be accessible only by specific trails and should prohibit bicycles in many (if not most) places. This obviously is neither the intent nor the current practice of GGNRA.

This plan is filled with misstatements, inaccuracies and suppositions which have no basis in fact. The plan also omits numerous important issues. The quality of life in an urban environment is Impacted greatly by peoples' ability to experience the outdoors and have outdoor recreation. For those of us whose recreation includes our dogs, many places are off limits and most others require leashes, so we feel strongly about the places which allow us and our dogs to enjoy nature at our own Individual pace'in other words, allows them to run while we walk. As we have aged, GGNRA has become a larger and larger part of my and my wife's ability to enjoy the outdoors. I

have several physical problems which I battle, and staying as active as possible is a vital part of maintaining my quality of life. Our dogs are a large part of our recreation.

We've been frequenting Rodeo Beach all the decades we've lived in Marin, and later the discovery of Crissy Field, Fort Funston and Ocean Beach gave us more opportunities to enjoy the beach. To have these taken away from us because our dogs cannot accompany us, or must walk at our slow pace, would be severely restraining. If this comes to be, my ability to stay active would be very negatively affected, as my outdoor life includes the dogs and I wouldn't be able to utilize GGNRA without their company. I need to BE active in order to STAY active and healthy.

I always thought GGNRA was intended as a place where people can engage in all different forms of recreation. Walking with our dogs deserves equal representation with other forms of recreation. Yet while other forms of recreation can be enjoyed in many, many places in the Bay Area, dog walking is limited to only a few areas, and off-leash dog walking is virtually nonexistent except for GGNRA.

I can see nothing but negative consequences for the proposed actions. We take responsibility for socializing our dogs and taking care of their waste, and we have never encountered any problems with our dogs. Dogs which aren't socialized can become aggressive and protective, which could only increase problems; untrained, leashed dogs can be more aggressive than dogs allowed to meet one another off leash. The Bay Area has a high population of dogs; dog parks provide socialization but little ability for real exercise.

I also don't understand, after reading the proposal, why there is no specific evidence presented regarding detrimental effects on wildlife and the environment by dogs. I haven't experienced this, nor have I witnessed any pet owners being irresponsible in allowing their dogs to chase wildlife or damage the environment. Our dogs have always been trained to not disturb wildlife and we have always kept them out of areas designated as protected. Given this, as well as the fact that no specific evidence is in the plan, only suppositions and speculation, I question the viability of the material. Marin and San Francisco have been fine with the policies already in effect; to change them would be deleterious in so many ways, I can't see why it is being proposed. The plan has a number of items I question. For one, I know of no "degradation of soil and water resources" because of dogs. Humans "degrade" the soil more than dogs just by walking on it, and the areas that concern me, being beaches, get no water degradation. I can't imagine how any place would experience such things'the only single "degradation" I can think of would be dog waste, and all the dog owners I know are careful to pick up not only their own dogs' waste, but that of others as well. I have

seen many places where dog waste is a problem; GGNRA is NOT one of them. Those of us who utilize it are more careful about this issue than the general population, by far.

The proposal claims that impacts to physical resources would be from negligible to ADVERSE because of dogs. That is a very open statement; to determine how to proceed, it would have to be more specific to be of any value. Rodeo Beach hasn't changed in all the years we have walked there, and I don't see how dogs have had any adverse effect on it, or how any "severe" effects could be envisioned. This needs more clarification as to exactly WHAT is meant by "adverse" impacts. Otherwise it sounds like someone who hasn't even been to these sites is merely imagining something. The same is true for Ocean Beach, Crissy Field and Fort Funston. PEOPLE walking somewhere erode the soil; dogs actually cause less erosion. Enforcement of dog-waste regulations would avoid any other form of degradation that I can imagine.

Impacts on health and safety is another unclear issue. How dogs could negatively impact health, as opposed to how they POSITIVELY impact health, both physical and mental, is nowhere taken into account. Considering the population involved, the issues of safety have been unquestionably minor, and nothing can completely prevent controversy, whether dogs are there or not. When it comes to safety, the places we go within GGNRA are far safer than the vast majority of urban areas; I would guess that is true of all GGNRA areas.

Dogs which are confined, don't get sufficient exercise or aren't socialized result in far less safety than those who receive proper exercise and training. People who regularly recreate with their dogs are the ones who bother to train and socialize their pets; as a result, we are promoting safety more than those who do not.

When it comes to native vegetation and the Snowy Plover, every dog owner I have ever encountered is careful to keep their dogs out of protected vegetation and the Plover territory. Certainly there are those who are irresponsible, but there are irresponsible people everywhere; they are in the minority, this I KNOW, because those of us in the dog community are quick to police them ourselves.

All in all, reading through the plan, it is entirely too generic; "negligible to adverse" covers a wide spectrum, and nothing I read, from what I have experienced personally, would lead to serious or adverse results if the 1979 policy were kept in place. I can't speak for many of the areas, but I would assume the same is true in most of the areas of GGNRA.

Impacts to the soil would be "long-term, major and adverse" at Fort

Funston, according to the proposal, if things remain the same. If Fort Funston were to be made into a leash area, or even worse, a no-dog area, it would be frequented by very few people. It's cold, out of the way, and not very scenic. Few people go there who don't have dogs. As a result, the very concept of Fort Funston as a recreation area would be useless, which goes directly against the intent of GGNRA as created. To defeat GGNRA as a recreation area WOULD make it just like a national park: something to be kept pristine, unaffected by even humans. Were it somewhere else, this might be of value, but in the middle of an urban area like San Francisco, where it is desperately needed for recreation, is absurd.

It is stated that the Department of the Interior has responsibility for fostering "wise use of our land and water resources" AND "for the enjoyment of life through outdoor recreation". In national parks, certainly this means keeping the land free of any contamination...by humans or anything else. Not in an urban recreation area; there "wise" use of land and water resources must be BALANCED against the enjoyment of life through outdoor recreation. If we enjoy the land and water for recreation, there will be degradation, it's inevitable even if only humans use it. The balancing act is necessary. GGNRA is not a national park. It's important that it be preserved for everyone's use, every form of recreation, in such a hugely populated area where enjoyment of life through outdoor recreation is needed more than anywhere else.

Enjoying life through outdoor recreation with our dogs is every bit as important as any other form of recreation, moreso actually, as anywhere you go where dogs are allowed off leash, you will see more dog owners with their dogs than you will almost any other form of recreation being practiced. All other forms of recreation can be done almost anywhere; recreation with dogs off leash can only be done in a few selective places. Please give ALL of us the use of the GGNRA. Thank you for your consideration.

Sincerely,

Jim Cunnington San Rafael, CA 94901

cc: Senator Feinstein Senator Boxer Congresswoman Pelosi
Congresswoman Speier Secretary Salazar Director Jarvis Director Lehnertz
Mayor Ed Lee S.F. Board of Supervisors

Correspondence ID: 4405 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My husband and I bought our home in Montara three years ago. One of our main criteria in our search for a coastside home was that we could step out our front door and go for a hike with our dogs. During our walks in Rancho Corral de Tierra we have met many other folks that moved to this little town for the same reason. We joined the Montara Dog Group, headed by Bill Bechtell, which has over 300 human members and over 400 canine members. This group, as well as the many other local residents, have used and cared for this land for decades, fending off developers, Cal Trans and others who would have harmed this beautiful area. Hikers, bikers, joggers, equestrians and dog walkers have enjoyed recreating in this area without interference or serious frictions (see attached letter from Ken White).

Our concern is not just for losing the privilege to use this beautiful area in our backyard but also for the other areas we enjoy with our dogs within the GGNRA confines. We do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog as well as on leash dog walking in many areas of the GGNRA. The rationale provided in the DEIS to allow for a change in the current 1979 Pet Policy areas (plus the San Mateo County GGNRA) does not appear to be based on sound science and long-term monitoring of site specific conditions. Many statements seem to be opinion vs fact based from actual impact studies.

This Draft Plan/DEIS is about making a change to rules about dog use. Therefore, in order to be useful in this regard, the Affected Environment discussion must present information about how the environment has been impacted by dogs, and not just by dogs but also by humans. The Draft Plan/DEIS does not present baseline conditions that require a change in the rules.

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

We are concerned with long-term preservation of the GGNRA's natural resources and want to protect these important natural areas. We are active volunteers with the Marine Mammal Center and have actually found dog walkers around stranded marine mammals to be very concerned with the well being of the sick sea mammals and very cooperative in controlling their dogs around these animals. We also volunteer, as a foster home, for rescued dogs and know that it is crucial that our dogs are well behaved and trained in order to co-exist in an urban environment and for them to be suitable for adoption. Getting out, walking dogs provides exercise and socialization not only for the dogs but also for the humans. Many of the alternatives outlined in the new plan, for off leash walking especially, are not readily accessible for people with mobility restrictions (see proposal regarding Fort Funston).

The draft EIS excludes the quality of the urban environment from its scope, saying it is not significant but the reality is that the GGNRA provides much needed open space in an urban environment. This omission is concerning because the fundamental purpose of creating the GGNRA was to provide for open space recreation, and dog walking is a form of recreation, to serve the metropolitan Bay Area. This plan is based on Yosemite type conditions and must take into consideration the "R" for recreation in an urban environment. The San Mateo County area parks and preserves are particularly unfriendly to dogs and closing off Rancho to dog walking would make the area residents have to travel to Fort Funston or Crissy Field. The remaining, contracted spaces for designated off leash dog walking would experience increased impacts in smaller spaces which leads to more incidences of dog on dog aggression, creating issues where there were none before.

Please keep the GGNRA truly a part of "Parks for all Forever". The draft EIS is biased against dogs and does not take a truly scientific look at the No Action Alternative or variations on that alternative. There are so many areas where the existing 1979 Pet Policy has been working and where sensitive species are not present, visitor conflicts do not occur or are not frequent and dog walkers have been stewards of the lands. Hikers, bikers, skaters, joggers, kite flyers, stroller pushers and on and on have so many choices of where to go to enjoy the urban park areas of the Bay Area, please keep dog walkers options open too.

Respectfully,

Suzanne Hawley an Russell Rosenberg Montara, CA Mail: Rancho Cordova, CA 95670

Cc: Senator Diane Feinstein Senator Barbara Boxer Representative Jackie Speier Representative Anna Eshoo Ken Salazar, Secretary of the Interior Jon Jarvis, National Park Service Director Bill Bechtell, President, Montara Dog Group

Correspondence ID: 4406 **Project:** 11759 **Document:** 38106

Received: May,30,2011 00:00:00

Correspondence Type: Letter

Correspondence: May 24th, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

My name is David Heughan and I writing to oppose the GGNRA's draft dog management plan. I live in Noe Valley and enjoy a number of parks as a place of recreation for both myself and my dog. I visit Fort Funston on an almost daily basis and also regularly visit Baker Beach, Crissy Field and Muir Beach on weekends. Since becoming a dog owner 18 months ago I have really enjoyed having a daily reason to get outside and exercise my dog regardless of whether it is warm, cold, wet or foggy. This not only benefits my mental and physical health but also the health of my dog. As any dog trainer will say; a tired dog is a happy dog.

I have attended a number of information sessions regarding the draft dog management plan. I believe that it is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any

significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input or evidence of any adverse impact.

The Bay Area is such a special place to live because of the climate, outdoor lifestyle, natural beauty, job prospects and unique outlook on life. All of these aspects need to continue to be balanced (they are interrelated after all) so that all people who live in the Bay Area can continue to enjoy living here. This is particularly important given the reality of the area: we live in a densely populated urban environment. The draft proposal is overly restrictive and does not balance the different aspects that make the Bay Area so special. People from diverse backgrounds and with varied interests happily live side-by-side in the Bay Area by interacting with each other in a mature, respectful and responsible manner. These attitudes are an important foundation of our society and need to be demonstrated through all aspects of our lives. Draconian measures such as those contained in the draft proposal do not honor these attitudes. I fear that the draft proposal is another example of the green / environmental agenda, based on questionable "science", being used to force through policies that aren't wanted and aren't needed.

Sincerely, David Heughan

San Francisco, CA 94131

Correspondence ID: 4407 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 27th, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was

designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.
- ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- ? Exclude speculative, exaggerated, biased, or misleading statements and studies.
- ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- ? Enable professional dog walking and align any professional dog walking rules with county or city regulations.
- ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:

Since this issue has come to my attention, I have endeavored to fully appreciate both sides of the argument before drawing my conclusion. The proposals caused an emotional response from me initially, as I am a dog-owner and frequent visitor to Fort Funston and other sites throughout the region. However, I am also concerned about the environment, preserving it for future generations, and inclusive use of recreational areas. It has become clear to me that the proposed changes are not based on sound scientific research; and vastly overstate the impact off-leash dogs have on the environment.

The impact of the loss of off-leash recreational space on dogs and their owners, in my opinion will have far greater effect on the quality of recreation available in the city and surrounding areas. The impact of unexercised dogs in homes, on side-walks and in small cramped dog parks is a recipe for disaster in terms of maintaining the type of harmonious communities that San Francisco thrives on and is widely known for. While my dog gets plenty of on-leash exercise in the form of walks and runs, daily access to Fort Funston is the key to her overall sense of well-being (and

mine). These things cannot be measured easily, but the impact of the lack of them on both of our lives would be significant in terms of mental and physical well-being: surely this is the definition and purpose of recreation?

Sincerely, Mrs. Lee Heughan

San Francisco, CA 94131

Correspondence ID: 4408 **Project:** 11759 **Document:** 38106
Received: May,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: Comments to the GGNRA regarding the dog management plan/Hemphill

As a member of the San Francisco Animal Control and Welfare Commission for the past four years, I feel the need to address this issue in detail and to be a voice for those who are not dog advocates, and who are not being heard, including older people, children, and other adults who for a variety of reasons prefer not to be around dogs. I also want to speak up for wildlife, who enrich our world, and who need supporters. Please be patient with lengthy comments.

I would like to thank the GGNRA for working to develop a dog management plan for the national park that is our immediate neighbor. The document produced is clearly the result of a project that has taken a great deal of time.

For years, San Francisco itself has had a lack of leadership in enforcing any laws regarding dogs. The result is that dog owners have been left to police themselves. As a result of this laxity, the guidelines for off-leash dogs are unclear and lead to a culture where dogs are off-leash where they should not be, dog waste is not picked up, and few dogs are licensed. There is no protection for wildlife in restored areas, as signage is ignored (Please see attached photo #1 of the wildlife area in Pine Lake Park with the dog in the lake with the ducks). Dog organizations in SF have loud voices and see the dogs as important, overlooking the numerous other animals in San Francisco. These organizations wish to extend this attitude to the GGNRA, where wildlife should be protected for all to appreciate, and where people should be able to have an experience that does not involve dogs.

At Fort Funston, I and a group of friends, while riding our bikes there, experienced a problem with dogs. We biked around Lake Merced and decided to ride up to the ocean overlook at Fort Funston. The path up was full of off-leash dogs and dog owners, standing and talking, making no effort to get out of the way, or to remove their dogs from the multiuse path.

Some of the dogs barked and growled. We had to get off our bikes and walk. Weeks later, we tried this a second time, wondering if we had just hit a bad day, but the experience was the same. If dogs are going to be in the GGNRA at Fort Funston, they need to be on leash or in a fenced area. They are not compatible with other users of our national park.

I know quite a number of adults, some with children, who have simply "given up" on Fort Funston as it is not possible to have a dog-free experience there. It seems very unfair to me that one group of users would be able to push the others out. In San Francisco, many elderly people have given up on going to our parks because of fear of being knocked over by off-leash dogs and suffering a broken bone. In Europe there are a lot of older people in parks, but not in San Francisco, even though more than 15% of the population is now over 65.

The other experience that many of us have shared is politely telling the owner of an off-leash dog that their dog should be on leash and then being insulted or cursed. If an enforcing officer arrives, the dog is then put temporarily on leash, but is quickly freed again as soon as the officer departs.

I personally feel that it would be best to have no dogs in the GGNRA, to protect wildlife and to save the large expenses of enforcement. I was surprised by how much money needs to be budgeted for the dogs. With no dogs allowed, bringing the GGNRA into line with the other national parks, enforcement would be easy. I also feel strongly that no commercial dog walkers belong in the GGNRA. I think that would legally open the door to all kinds of commercial enterprises operating in the GGNRA. However, since the proposed plan already includes dogs, I will direct my comments to that possible compromise.

On the following pages, I have tried to organize my comments into categories. I will begin with some comments about the dogs in San Francisco as they are being used to argue for more off-leash access in the GGNRA, and some of the information that has been presented by the dog advocates is simply not correct.

How many dogs live in San Francisco? How many people don't have dogs?

It is unclear how the estimate of dogs living in San Francisco is calculated, as dog licensing is voluntary and most of the dogs here are unlicensed. So, this does not give us any kind of an estimate. The number of 120,000 (dogs in SF) has been used for years with no explanation as to how this number was calculated. This would make approximately 15% of the 800,000 San Franciscans, dog owners, if one assumes one dog per person. However, many people have two or more dogs, so the percentage of residents with

dogs would actually be lower.

Lately, dog organizations have increased the number they quote, and now say that 25% of San Franciscans have dogs, which would give us 200,000 dogs in our 47 square mile city, with again no explanation for the data. I think both of these estimates are probably incorrect. If in fact, 25% of San Franciscans do have dogs (and the number is probably far lower even than 15%), then 75% to 85% or more of residents, do not have dogs, yet will potentially be users of the GGNRA. These non-dog-owners are not an organized group and cannot be contacted easily to solicit their opinions. But those who do not own dogs are clearly the majority of GGNRA users from San Francisco.

Dog spaces in San Francisco...

Dogs in the city...Historically dog owners have pressed for dog spaces in the city and there are now more than 30 in the city with two more on the way, at Heron's Head and at Beale Street. However, almost all of our more than 200 Rec and Park properties are used by off-leash dogs, despite signs saying "no dogs" or "dogs on leash". A trip to any of them will quickly validate this. The dog spaces (dog parks, dog play areas, etc) that have parking lots or lots of nearby parking are the ones that are most popular with commercial dog walkers. These include Stern Grove, the Northeastern Golden Gate Park area, and McLaren Park.

A fellow ACWC commissioner, and I recently toured all of the dog parks in San Francisco and found them to be very underutilized. Additionally, the designated areas are poorly demarcated, signage is poor, and leash laws are not enforced. The San Francisco Recreation and Parks Department, over many years, has dedicated money to building fenced dog parks and designating dog play areas. Only a few of these many dog areas are listed on the SFDog.com website, and these are often described as inadequate in comparison to the much vaunted glories of Fort Funston. If I looked at just that website, I would take my dog to Fort Funston.

Of the 30+ dog spaces, some, like the area in McLaren Park, cover many acres. After visiting most of them over the past few weeks, at many times of the day, weekdays and weekends, I can say that they are very underutilized. None were seen that were crowded, and many were almost completely empty. There is not a problem with not having many choices of spaces for dogs in SF, but rather a problem with distribution of the dogs across these spaces. And some dogs do not even use these spaces. In fact, many dog owners do not go to public parks at all, but rather walk their dogs in their own neighborhoods. They do not regularly get into the car to take their dogs, small ones and large ones, elsewhere.

I am attaching photos of 13 of the more than 30 dog parks in San Francisco. I have available photos from almost all of them, but have not printed them all out. The largest one, McLaren, is not attached here. All are hard to characterize with a single photo. These photos were taken in the afternoon on good days, and almost all were on weekdays. The commercial dog walkers are usually working during the week when the dog owners are at work. We did see an occasional commercial dog walker bring 8 to 10 dogs, but this did not crowd these dog spaces. However, when we went to Fort Funston, the commercial dog walker vehicles were lined up. As we arrived, I counted 18 one afternoon in the parking lot. If each brought 8 dogs and stayed for an hour or so, that is 144 dogs per hour at Fort Funston. But, these 18 dog walkers could easily be spread over the San Francisco facilities if schedules were coordinated. Clearly all could not choose Stern Grove.

I helped a friend walk his son's 3 dogs recently. It quickly became clear that the SF fenced facilities were the easiest to use for any off-leash activity. The dogs were safe and there was a culture of cleaning up waste and as all dogs were off-leash, there was no problem of the conflict between one dog being off-leash and one on leash. Some of these facilities were double-gated and this amenity kept dogs from escaping when the first gate was opened. In the unfenced dog areas, there was frequently dog waste that had not been picked up. Dog licensing in the GGNRA

I think that every dog in the GGNRA should be required to have a license. I watched a runner with a collarless dog being stopped by a GGNRA ranger on the beach to be cited for no leash on her dog. She had on a T-shirt and shorts and carried no ID. Runners often don't carry much with them, but a dog tag could identify the person with the dog. Otherwise, how will enforcement happen?

As one example, Houston, Texas has mandatory licensing for every dog and cat more than four months old. Enforcement can be a problem anywhere, but it is clear that San Francisco's voluntary dog licensing program does not work. The GGNRA could help encourage a mandatory program, which would protect visitors as licensed dogs have had their rabies shots.

Commercial dog walkers

In my opinion, commercial dog walkers need to be licensed, and should pay a business tax. I know that this is being considered by the supervisors in SF. They should be able to walk only a limited number of dogs. In my opinion, I think 6 dogs should be a maximum. (Picture trying to pick up the dog waste from 10 dogs.) Looking on the web, commercial dog walkers in San Francisco charge between \$350 to almost \$400 per month for walking one dog on weekdays (20 clients at \$370 per month = \$89,000/yr). Food trucks in our public parks in SF pay for being there. It seems that dog walkers using

our public spaces for their businesses should also.

These dog walking businesses could also be scheduled to use the facilities that have been created for dogs in San Francisco. If we can have smart phone applications for parking places in San Francisco, we can also reserve spots for commercial dog walkers in dog spaces in San Francisco in some equitable fashion, using the web, and distribute them so they do not all crowd into one space. They would have many choices.

It makes little environmental sense to have these businesses transporting dogs from all over San Francisco to the GGNRA. One advertised dog walker uses McLaren Park and limits business to dogs who live in that area. This is very reasonable financially, because travel time and gas both come off of the bottom line of the dog walker's business and a short transport is safer for the dogs. All dogs that are taken out by commercial walkers should be licensed.

Many of the dog walkers at Fort Funston, commercial and non-commercial, are not from San Francisco at all. Over various days signatures for a petition that was for San Francisco residents were collected at Fort Funston, by approaching dog walkers, and the person soliciting found that about 50% of people at Fort Funston were not from SF. It is not the responsibility of SF taxpayers to provide facilities for out-of-county dog owners currently using the GGNRA. They need to find space in their home counties. All of the dogs that come to the GGNRA with their owners or with their commercial dog walkers are not from San Francisco and will not end up using SF facilities if they are limited in their use of the GGNRA.

One way to control commercial dog walkers at Fort Funston would be to designate a small number of parking places for them in the parking lot, parking places with an hour time limit. Their vehicles should have an identifying bumper sticker that can be checked against their license plate and the dog walkers themselves could wear an ID tag. Once again I do not feel that they belong there, but if they are to be there and have dogs off-leash, they should do so in a fenced area. Landscaping with natives could help to disguise the fence. Enforcement would be easier and dogs would not be lost. Commercial dog walkers do lose dogs. The majority of people who come to the GGNRA without dogs could then have a dog-free experience in a national park.

Environmental damage from dogs

I remember when Fort Funston was covered in ice plant around the parking lot area. Ice plant is a very tough "bullet proof" plant. I have spent time pulling up this native in areas where the native habitat is being restored. This plant has literally been worn away by the presence of so many dogs.

Dogs dig and dog urine burns grass and other plants, probably due to the high nitrogen content. Grass in SF parks is crisscrossed by numerous dogs, and dead grass can easily be seen in circular areas where repeated marking from the dogs has occurred. These areas continue to enlarge as more dogs urinate there. I think this is another reason to limit the dogs to fenced areas.

I have often walked along the beach from Sloat to the Cliff House, and many times have seen off-leash dogs chasing the birds feeding and resting on the beach, forcing them to take flight. This problem not only affects endangered birds, but rather all of the birds on the beach.

Thank you for your attention. I know that my comments are long, but I do think that protecting all animals, including wildlife, is important. Dogs are not the only animal to be taken into consideration in San Francisco, despite all of the loud voices of dog advocacy drowning out a democracy, and this is especially true in the GGNRA, which offers a rich habitat for our wildlife.

Pam Hemphill MD

Correspondence ID: 4409 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

Thank you for the opportunity to comment on this important document, the Golden Gate National Recreation Area's (GGNRA) Draft Environmental Impact Statement/Draft Dog Management Plan (Draft Plan/DEIS).

My name is Bill Bechtell and I am president of the Montara Dog Group. The group consists of approximately 300 people, mostly residents of the San Mateo County midcoastside, who regularly walk their dogs in the open space known as Rancho Corral de Tierra (Rancho), soon to become part of the GGNRA under the "New Lands" classification. The midcoastside includes the small unincorporated communities of Montara, Moss Beach and El Granada. It is bounded on the west by the Pacific Ocean, and on the east by Rancho. The area has long had the reputation of being a dog-friendly area, largely because of the numerous trails available in Rancho for dog walking. I, myself, have lived in Montara for 35 years, and regularly walk my dogs on the numerous Rancho trails. The midcoastside is also a tight-knit community willing to fight hard to preserve the cultural and environmental values that attracted us to this area in the first place. For many years the open space, now known as Rancho, was privately held by various development corporations. They tried to build condos and golf courses, and to subdivide the property into "ranchettes." We fought back all of these

attempts. Then Caltrans dusted off some 1960s- era freeway plans, and tried to put a freeway (the Devil's Slide Bypass) through the heart of Rancho. Again we mobilized to fight this freeway, and eventually convinced Caltrans that a tunnel behind Devil's Slide was a much better solution, again sparing Rancho.

Then in 2001, the Peninsula Open Space Trust (POST) purchased Rancho to save it from development. We dog walkers have had a very good working relationship with POST over the years. They have no staff rangers, so we have been POST's eyes and ears on Rancho, reporting off- road vehicle activity and illegal dumping. We have also installed and maintained dog waste disposal cans throughout the dog walking area at our own expense, and all done by volunteers from our group.

If the GGNRA's Preferred Alternative D for New Lands (No dog walking allowed) is put into effect, it will be very sad and ironic that those of us who have fought so hard to protect the land are now forced off the land.

One of my main concerns about this plan was lack of public involvement in the treatment of "New Lands" (see p. 32, Public Involvement with the National Environmental Policy Act Process). The public has not had the opportunity to participate in the development of the Dog Management Plan when it comes to the New Lands category. New Lands were not involved in the scoping process and the other activities required by NEPA, nor were they involved in the negotiated rule making process. When the GGNRA held a General Management Plan workshop in Montara in January, 2009, over 50 dog owners showed up to speak in favor of continued off-leash dog walking, and submitted a petition with 128 signatures to that effect. Our input was ignored! We were told that the GGNRA had no intention of addressing dog policy until the Dog Management Plan came out, and now we are not even recognized in the Dog Management Plan. The GGNRA worked with the horse owners during this period, and allowed existing stables to remain (although horse owners were informed that dogs are no longer allowed in the stables) and continued to allow horseback riding on GGNRA trails. The GGNRA should have worked with dog owners, too, since they knew that our concerns would not be addressed in the Dog Management Plan. We knew that the GGNRA had no information on dog walking in Rancho, so we tried to bring three maps showing the dog walking areas to a Dog Management Plan workshop in Pacifica on March 9, 2011, and were barred by NPS enforcement rangers from bringing the materials into the workshop! The maps are attached at the end of this report, for your information.

Another main concern is the paucity of data in the EIS regarding recreation impacts. Recreation impacts should be studied when developing a range of alternatives, and compared to environmental and other impacts. The Dog

Management Plan should be providing for visitor recreational uses such as dog walking, and not attempting to reduce or eliminate dog walking, as this plan makes every attempt to do, particularly in Rancho, where it is proposed to ban dogs totally (GGNRA's Preferred Alternative D). When congress authorized the establishment of the GGNRA, they recognized that much of the area was adjacent to or very near to urban areas, and that much of the area has been historically used for recreation. That is why the Enabling Legislation of the GGNRA clearly included recreational use in this urban national park, as it is not pristine wilderness like Glacier National Park. When the GGNRA tried to change it's status from "National Recreation Area" to "National Park" in 2008, there was a large public outcry from a coalition of the park's recreational users against that proposed bill, and congress, in it's wisdom, dropped discussion and decision on the bill. For a more detailed discussion of this issue, see page 5, below.

The tone of the EIS tends to pit dog walkers versus environmentalists, and that is not necessarily the case. Although a dog walker, I also consider myself an environmentalist. I have been a Sierra Club member for almost 50 years (former trip leader), and a member of Sequoia Audubon Society (former board member) for about 30 years. With proper education, signage and enforcement, there is no reason for dog walking to cause enviromental damage, either to wildlife or plants. Mr. Ken White, president of the Peninsula Humane Society & SPCA, considered the effect of off-leash dogs on Rancho near Montara, and came to these conclusions:

"Our professional wildlife rehabilitation staff completed a review/analysis of the site and the proposal, and we believe that there is no observable reason related to the protection of native wildlife which would juste denying access to off-leash dogs in the area."

"Please reconsider your plan to ban dogs and off-leash dog play from the small areas of Rancho Corral de Tierra which informally allowed this use for years with no negative impact."

The full letter is attached at the end of this report. Montara Dog Group certainly realizes and accepts the need to ban dogs (and people) from certain sensitive habitat areas and will cooperate fully to help protect those areas when they are identified by scientific studies. We also have issues with the "Compliance-Based Management Strategy" discussed on page 1116 of the report. Although we feel that this could work, if properly implemented, there is insufficient detail provided on how compliance is going to be monitored. The GGNRA should reach out to dog user groups for help in implementing a strategy of this type. As responsible dog owners, we do not like to see dogs and/or their owners misbehaving any more than others do. In fact, it upsets us more, because the bad behavior on the part of a few sullies the reputation of us all. We would be glad to accompany GGNRA

monitors to implement a program of this type, but it needs to be fair and well thought out. Otherwise, it will not receive public support, and be thought of as a "poison pill" inserted by GGNRA into the Dog Management Plan as a way to automatically avoid the necessity of public input before placing even further restrictions on dog walking.

The considerations in the Dog Management Plan are not fairly balanced, in that both Marin and San Francisco GGNRA counties have had off-leash dog walking areas as part of the 1979 Pet Policy. San Mateo county needs to be considered for discussion and inclusion for off-leash areas of dog walking as part of the DEIS Dog Management Plan now underway. There is a need for off-leash areas in San Mateo county as well as the other two counties in the GGNRA.

Banning dogs from Rancho will also pose a safety issue. Everyone who currently walks their dogs in the open space will be forced onto Montara's narrow rural streets, with no sidewalks. We can currently access McNee Ranch State Park, where dog walking is allowed, through Rancho. If that is prohibited the only way to get to the park will be to walk about 1/4 mile along busy Highway 1. One of our members was recently walking along the highway with his dog and was struck by a car. Fortunately he survived, but his dog did not.

The concept of applying this Dog Management Plan/EIS to "New Lands," i.e. unknown property to be acquired by the GGNRA sometime in the future, is illogical and probably illegal. Scientific studies have been done on the 21 individual sites in the plan on which to base the GGNRA's preferred alternative for each. No studies have been done for Rancho. All New Lands acquired by the GGNRA should have the benefit of the NEPA Environmental Assessment process, particularly if drastic changes in land use are anticipated, such as banning dogs from areas where off leash dog walking has been the norm for decades, as is the case with Rancho. Until these studies are done, existing uses, including off leash dog walking, should be allowed to continue. New Lands should be treated the same as all other GGNRA lands, and be subject to the same GGNRA management policies. For a more detailed discussion of this topic, see page 11.

The GGNRA plays a critical role in providing a home for many natural and cultural treasures, and, because of its proximity to a dense, urban environment, it provides special recreational opportunities to city dwellers. Recreation is called out in the 1972 GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognized that the achievement of these outstanding values is not mutually exclusive. Our organization supports the National Park Service (NPS) in its mission to protect the GGNRA's important natural, cultural, and recreational values but, through this letter, we challenge the

NPS work with its constituents to find solutions that are designed to protect all of the park's values and broaden opportunities to enjoy its diverse resources sustainably.

Our comments are described in two main sections: (1) Recommended Alternative, which describes our thoughts on how the NPS could balance the GGNRA's myriad resources and opportunities; and (2) Quality of Information in the Draft Plan/DEIS, which describes our thoughts on how the information in the Draft Plan/DEIS could be improved in order to support a better outcome for all interests involved. Recommended "Hybrid" Alternative

Instead of the GGNRA's preferred alternative D for New Lands, i.e. "No dog walking allowed unless opened by GGNRA Compendium, " we recommend a modified version of Alternative A, No Action. New Lands, however, do not fall under the 1979 Pet Policy or the GGNRA Compendium, and therefore existing uses, including off-leash dog walking, should continue to be allowed until scientific studies prove that they are harmful to the environment.

Quality of Information in the Draft Plan/DEIS

My organization's major concerns with the quality of information in the Draft Plan/DEIS include:

1. Omission of relevant impacts and impact analyses o Recreation (also see Appendix B) o Other impacts
2. Insufficient information needed to draw logical conclusions and evaluate alternatives: o Unclear enforcement data (also see Appendix C) o Lack of and inconsistent site-specific, scientific data on baseline conditions (also see Appendices D, E, and F) o Reliance on undocumented assumptions o Flawed evaluation of No Action alternative o Resultant flawed alternatives analysis
3. Improper treatment of new lands
4. Lack of specificity in proposed action

These concerns are described in detail below and several are outlined further in the attached appendices. At the end of each section, we have provided recommended changes that we request you make to the EIS and the proposed action in order to move forward with a plan that is protective of all of the GGNRA's myriad resources and values.

1. Omission of Relevant Impacts and Impact Analyses Recreation

Congress' original intent when it established the GGNRA is stated in the bill reports for the 1972 legislation ' that GGNRA, "will ensure its continuity as open space for the use and enjoyment of present and future generations of city-dwellers" [House Report No. 92-1391, Sept. 12, 1972]. [emphasis added]. Similarly, as stated in the first section of Public Law 92-589, Congress established GGNRA to preserve for public use and enjoyment areas of Marin and San Francisco County possessing "outstanding natural, historic, scenic and recreational values" and to "provide for needed recreational open space necessary to urban environment and planning" and to protect the scenic and natural character of the area from incompatible development.

Dog walking was well-known and recognized by Congress as part of this public use and enjoyment. Both the Senate and House reports comment that the proposed area:

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

The official legislative history notes:

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

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

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

The Draft Plan/DEIS not only fails to disclose and evaluate the impacts of the alternatives on recreational resources in the context of an urban environment, it dismisses the quality of the urban environment entirely on page 22 where it states, "the quality of urban areas is not a significant factor in determining a dog management plan." As recognized in its enabling legislation, one of the most important aspects of the GGNRA is the sharp contrast between its undeveloped open spaces and the adjacent developed

urban environment. The GGNRA's open space and recreational opportunities are intended to provide refuge and relief for nearby urban dwellers.

The impacts on the GGNRA's open space and recreational opportunities should have been evaluated fully in the Draft Plan/DEIS, especially since a NEPA analysis is not limited to the natural environment. According to NEPA, An EIS is required to analyze the human environment. The federal NEPA rules define the human environment and its scope in an EIS as follows: "Human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." When an EIS is prepared and human and natural/physical environmental effects are interrelated, the EIS should discuss all of these effects on the human environment.

*Recommendation. Any significant limitations on recreational uses proposed by NPS needs to be properly examined, as it impairs a fundamental value that must be preserved under GGNRA's charter. The Draft Plan/DEIS should be revised to include a stand-alone analysis of impacts on recreation resources in order to fully consider the potentially significant effects that the proposed action and action alternatives could have on these elements of the human environment. The section should give context to the important role played by the GGNRA in terms of its proximity to a dense, urban environment and the special opportunities it affords to nearby populations. It should describe existing recreational uses of the GGNRA and other parklands in the project vicinity, the impacts of the proposed action on recreation resources and urban quality (including direct, indirect and cumulative impacts), and the mitigation that the NPS will commit to in order to avoid such impacts.

Although the analysis of impacts on recreation resources could potentially be integrated into the existing Visitor Use and Experience section, it is strongly suggested that it be incorporated into the draft EIS in a separate chapter. The rationale for this request is because the topic of "Visitor Use and Experience" is too limiting to encompass the broader range of recreation impacts that could potentially occur with implementation of the proposed action, including degradation of established recreational activities and facilities in GGNRA and nearby lands. A suggested annotated outline of the stand-alone recreation resources section is presented in Appendix B for your consideration.

Other impacts

The Draft Plan/DEIS assumes but does not provide the required rigorous analysis that resource conditions result solely from dog use of the sites, discounting the contribution from other visitors and recreational users. The

Draft Plan/DEIS does not address the contribution of other impactful activities, including special events, to the resource conditions and existing impacts at each of the GGNRA sites. The level of site use from a single special event is likely equivalent to the level of regular use that occurs over weeks, months or longer. These special events include the annual Fleet Week at Crissy Field and the future impact of America's Cup on GGNRA lands.

*Recommendation. To address this deficiency, the GGNRA should study the contribution that all visitors make to existing resource conditions and potential impacts. This information is obtainable and essential to a reasoned choice among alternatives. The preferred alternative should then be re-evaluated and modified to address only the issues that specifically result from dog use at each of the sites. The NPS should then pursue a comprehensive approach to managing all these uses to the benefit of the full ranges of GGNRA resources and values.

2. Insufficient Information Needed to Draw Logical Conclusions and Evaluate Alternatives

In many places, the Draft Plan/DEIS does not provide any data on actual impacts by dogs in areas being proposed for new dog walking restrictions. In places where data are provided, the Draft Plan/ DEIS makes undocumented assumptions that there are unacceptable impacts and that dogs are the culprits. For example, in the Western snowy plover sections of Chapters 3 and 4, the Draft Plan/DEIS explains that people, as well as dogs, who traverse dune areas disturb shorebirds. Monitoring surveys observed 48 off-leash dogs chasing birds over a period of 12 years. However, in this case the birds continue to return to the area each year. Therefore, there might or might not be a problem ' the Draft Plan/DEIS does not provide substantive data to help the reader decide. If there is a problem, the Draft Plan/DEIS doesn't provide logical conclusions as to whether access should be limited for people, for dogs, or both.

The Draft Plan/DEIS is, in some respects, comprised of about 20 plans and EISs, because it examines each GGNRA unit. We can appreciate how difficult this is for GGNRA and the NPS to accomplish. But NEPA guidance and case law have consistently explained that difficulty does not excuse lack of adequate data and study in an EIS. And the bulk or size of an EIS does not equate to its adequacy. In many places, as described in more detail below, the Draft Plan/DEIS lack any description of actual site specific impacts on which decisions on dog-walking restrictions are being proposed. In other places, the Draft Plan/DEIS assumes species are present in areas where there is no record of their presence. In other places, there is inconsistent information about the presence of species.

Unclear enforcement data

Many of the findings in the Draft Plan/DEIS are founded on a reference included in the document as Appendix G, "Law Enforcement Data" (NPS 2008c). This reference document is critically deficient in substantiating statements made in the characterization of existing conditions and in the analysis of the environmental consequences. Per NEPA, "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements (CFR 1502.24)." Additional detail on this issue can be found in Appendix C.

*Recommendation. The Draft Plan/DEIS should be revised to provide clear evidence in the record to support all of its findings. The NPS needs to ensure the professional integrity, including scientific integrity, of the analysis and findings contained within its Draft Plan/DEIS. Detailed recommendations on how to revise the enforcement data in the Draft Plan/DEIS, and the ensuing impacts and alternatives analysis, are listed in Appendix B.

Lack of and inconsistent site-specific, scientific data on baseline conditions

The Draft Plan/DEIS does not address site-specific resources and the condition/health of those resources. This lack of information results in a vague baseline against which to assess the magnitude of impacts associated with implementing the proposed action and alternatives. With such a vague baseline, it's also difficult to assess the need to change existing dog management strategies.

Select examples:

- a. The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but no data are provided as to where/if they are actually present.
- b. While some special-status species descriptions suggest a nexus between dog activity and the species and/or their habitat (tidewater goby, California red-legged frog), other species descriptions do not (San Francisco garter snake, Coho salmon), and there is a consistent lack of detail describing the existing interaction, if any, between the species and dog activity.
- c. There are inconsistencies regarding the presence of species in the text and in Table 8 in the Special-Status Species affected environment, the information in Appendix H, and the impact analyses in Chapter 4. d. In Table 8 on page 246, the GGNRA Location column contains the location for plants that do not exist there according to the text.

e. For a number of the analyses of Alternatives B-E, the Draft Plan/DEIS states that the area of impact is currently undisturbed. This is not the case, as dogs and humans are currently allowed in those areas.

f. Additional examples are provided in Appendix D "Soils and Geology," appendix E, "Water Quality," and Appendix F, "Biology."

*Recommendation. To address this deficiency, the Draft Plan/DEIS should provide site-by-site assessments of the conditions of the GGNRA resources and values at each of the 21 sites. The selected preferred alternative for each site should then be re-assessed and modified to address only those site-specific issues and to employ adaptive management (proposed adaptive management techniques are provided at the end of this letter) to ensure the goal of protecting those resources and values is achieved.

Reliance on undocumented assumptions

The Draft Plan/DEIS assumes, but fails to demonstrate, the "cause and effect" relationships without site-specific supporting information. For instance, the Draft Plan/DEIS assumes but does not demonstrate that where dogs are present within GGNRA sites, there is a disturbance of natural resources. The Draft Plan/DEIS also assumes but does not demonstrate that the disturbance of resources is attributable to dogs (versus other factors). These assumptions result in flawed conclusions that the mere presence of dogs is equivalent to adverse resource impacts. The findings of an EIS must be based on scientific accuracy and clear evidence in the record. This Draft Plan/DEIS is significantly flawed in that it does not rely on adequate evidence for the conclusions it draws, and in that it fails to clarify its methodology for drawing those conclusions.

Select examples:

a. The text from Chapter 3 provides data on the western snowy plover, but beyond providing numbers of observations, the Draft Plan/DEIS does not provide evidence that dogs chasing the birds are likely to impact the survival of the species taking all relevant factors into account (see paragraph 1, page 799).

b. The Draft Plan/DEIS presents no information supporting the finding that dogs are currently impacting shorebirds and marine mammals. Therefore, there is no scientific rationale for prohibiting dogs from beach areas under Alternative D to "protect shorebirds and stranded marine mammals," as stated on page 151.

c. The Soils and Geology section (page 225) includes the following statements: "Dogs and dog walkers that do not stay on designated trails and

venture off trail create social trails that become denuded of vegetation and result in increased soil compaction." and "Soil compaction is common along social trails that have been created by ' and are heavily used by ' bikers, hikers, runners, and dog walkers." The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. At about 200 pounds per adult, the force that a human exerts on the soil one foot at a time would have a significantly greater impact on soil compaction in a picnic area than the force exerted by even a large 70-pound dog distributing its weight on four paws. The failure to acknowledge that human use has more impact on soils and geology in this regard, compared to dog use, uncritically loads the analysis in favor of restrictions on dogs. While there may be areas in which impacts from dogs are unacceptable, the same criterion holds for impacts from humans, and in most of these areas, dogs and humans are already excluded.

d. The Soils and Geology section (page 112) on Homestead Valley concludes that, under the No Action Alternative, there would be long-term adverse impacts from "soil compaction, erosion, and nutrient addition..., in areas off the trail since dogs would be under voice control," while under other alternatives it is concluded that the impacts would be negligible because dogs would be under physical restraint. This is an unsubstantiated assumption in support of the underlying bias of the analysis. The analysis does not attempt to connect intensity of use and impact and seems to be based solely on the incorrect assumption that humans and wildlife would have no impact on off-trail areas, and that all impacts can be attributed to dogs.

*Recommendation. To address this deficiency, the NPS should re-evaluate untested, assumed linkages and re-define the existing and potential impacts that specifically result from dog use at each of the GGNRA sites. The preferred alternative for each site should then be re-assessed and modified to address only those site-specific impacts and issues.

Flawed evaluation of No Action alternative

The impacts of the No Action alternative are substantially overstated because the Draft Plan/DEIS determines individual areas of compliance with existing dog management strategies without sufficient supporting data and assumes that noncompliance results in adverse impacts. This unsupported logic both overstates the degree of additional management required to address the resource issues, but also misrepresents the relative impacts of the four action alternatives; for example, the public is assumed to comply with management strategies under an action alternative, whereas the public is found to be noncompliant with those same management strategies under

the No Action alternative.

Select examples:

a. For many sites, including Stinson Beach, Crissy Field, Baker Beach and Bluffs, Mori Point, Oakwood Valley, and Muir Beach, analysis of Alternative A acknowledges noncompliance, while the other alternatives assume full compliance with dog restrictions. In some cases, the management strategy is the same, with the only difference between Alternative A and the preferred alternative being the assumption of compliance.

b. On page 109 (Table 5, Stinson Beach, Soils and Geology) under Alternative A, the second bullet identifies long-term, minor, adverse impacts in areas outside parking lots and picnic areas. These impacts are not repeated under the other alternatives despite the fact that, except for Alternative D, the management strategies under all of the alternatives are identical for Stinson Beach. Each of the statements in the first bullet, except for Alternative A, No Action, includes the clause "assuming compliance." At least for the soils and geology evaluation, the analysis seems to take it for granted that the No Action Alternative is inferior. Both of these are examples of biasing the analysis against No Action. c. On pages 1147-1158, mission blue butterfly, Fort Baker and Milagra Ridge ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) and the preferred alternative assumes compliance (negligible to minor, adverse impacts, with habitat restoration programs).

d. On pages 1219-1240, San Francisco garter snake, Mori Point, Milagra Ridge, Cattle Hill, Pedro Point ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). The text states (page 1230) that there is no documentation. that the current level of compliance with on-leash laws (No Action Alternative) is impacting this species.

e. In the Water Quality section, the impact analysis for Alternatives B through E assumes compliance with the management strategies. However, the impact analysis for Alternative A does not make this same assumption.

*Recommendation. To address this deficiency, the NPS should re-evaluate unsupported assumptions and the analysis of the No Action alternative to ensure the methodology used for it is consistent with the methodology used for the action alternatives. The No Action alternative is a continuation of the current GGNRA management plan and policies ' not a continuation of existing conditions. The current plan and supporting documents include

policies for good public information and education on GGNRA resources and partnerships with the community. The No Action alternative can and should include improved education and compliance measures (including accurate signage about voice control areas) to implement these current plan policies (which are also policies in the proposed GGNRA updated general management plan), including dog owner training, to raise the level of compliance.

Resultant flawed alternatives analysis

As described above in this section, the Draft Plan/DEIS assumes but does not provide the required rigorous analysis to enable the reader to draw logical conclusions about impacts and alternatives. The Draft Plan/DEIS does not provide adequate information on which to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of resources" (as required by NEPA Section 102(2)(E); 40 CFR "1501.2 and 1502.1 and corresponding DOI and NPS implementing guidance), or to allow meaningful evaluation on the alternatives including reasonable mitigation measures, as required by NEPA (e.g., 40 CFR "1502.14(b) and 1508.25(b) and corresponding DOI and NPS implementing guidance). This issue in the Draft Plan/DEIS results in a bias in the evaluation of alternatives, contrary to NEPA's requirement that "Environmental Impact Statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made" (40 CFR ' 1502.2(g)).

Select examples:

a. The impacts of the No Action Alternative are substantially overstated because the Draft Plan/ DEIS assumes that noncompliance results in adverse impacts. This both overstates the degree of management required to address the resource issues, but also misrepresents the relative impacts of the four action alternatives; for example, the public is assumed to comply with management strategies under an action alternative, whereas the public is found to be noncompliant with those same management strategies under the No Action Alternative.

b. On page 1264, bank swallow ' as with the western snowy plover, current impacts are considered minor to moderate based on occasional to frequent perceptible disturbances to the species from dogs; however, the description of Alternative A mentions only that dogs have been seen in the bluff area. There is no apparent nexus between dog activity and actual impact to bank swallows ' is the presence of a dog in the bluff area assumed to disturb the colony? Have the birds been observed flushing from nests, or have crushed burrows been found? The language here suggests these impacts are possible,

but that they haven't actually occurred.

c. In Chapter 2, starting on page 99, the discussion of the environmentally preferable alternative should be revised to reflect the value of recreational resources. Because the draft EIS does not recognize recreational resources as an environmental resource, the analysis of the environmentally preferable alternative is flawed. It fails to consider the range of resources afforded by the GGNRA that could be affected by the action alternatives. Recreation is called out in the GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognizes that the achievement of these outstanding values is not mutually exclusive.

*Recommendation, To address this deficiency, the NPS should re-evaluate unsupported assumptions and the analysis of the alternatives to ensure the methodology used for it is consistent and based on site specific scientific data. And, since protection of the environment includes protection of established recreational opportunities and facilities on GGNRA lands and nearby parklands, the draft EIS should consider such resources as part of its selection of the environmentally preferable alternative. Under NEPA, the environmentally preferable alternative is one that would employ environmental design and adaptive management techniques to preserve all of the outstanding values of the GGNRA.

3. Improper Treatment of New Lands

The proposed action to close new lands to dog walking access conflicts with the GGNRA Enabling Legislation (PC 92-589) and with National Park Service Management Policies (2006) for determining uses and land protection plans. GGNRA is required to consider new lands in the same way that it considers uses and land protection measures on lands within GGNRA.

The unprecedented "Closed until open" proposal would violate GGNRA's statutory obligation to preserve and maintain recreational uses, violate sound land planning with the community, and violate NEPA by prejudging alternatives before site-specific public and environmental review. There is no basis for treating new lands differently than existing lands under NPS regulations and policies. Furthermore, there is no such policy in the existing GGNRA General Management Plan and Compendium. The Draft Plan/DEIS notes (p. 36), the enabling legislation states GGNRA's purpose as follows (emphasis added):

"In order to preserve for public use and enjoyment certain areas of Marin and San Francisco counties, California, possessing outstanding natural, historic, scenic, and recreational values and in order to provide for the maintenance of needed recreational open space necessary to urban

environment and planning, the Golden Gate National Recreation Area is hereby established."

The phrases "preserve for public use and enjoyment" and "maintenance of needed recreational open space" set out a high standard for management actions that would limit or restrict this fundamental value and resource of the GGNRA. The words "preserve" and "maintain" mean the continuation of uses, recognizing that uses may be regulated to protect the other fundamental values of the GGNRA.

NPS management policies expressly reflect this emphasis on continuing uses, measured by the yardstick of the unit's enabling legislation. Section 1.4.3.1 states:

In determining whether or how to allow the use, park managers must consider the congressional or presidential interest, as expressed in the enabling legislation or proclamation, that the use or uses continue.

When new lands become part of GGNRA, the recreational uses existing at the time of acquisition should be allowed to continue unless GGNRA determines, through the public land planning and NEPA process, that unacceptable impairment would occur (as explained in Chapter 1 and Appendix C of the Draft Plan/DEIS).

Section 3.3 of the NPS management policies make clear that protective measures are to be integrated in to the planning process -- "Planning for the protection of park lands will be integrated into the planning process for park management" -- not predetermined in advance of site specific the public planning and environmental review process.

In preparing land protection plans, Section 3.3 requires: "A thorough review of a park's authorizing statutes and complete legislative history will be conducted as part of the land protection planning process."

Section 3.3 states that land protection plans should determine what "means of protection are available to achieve the purposes for which the unit was created." As noted above, recreational use is one of the basic purposes for which GGNRA was created. Dog walking was contemplated as a traditional use in GGNRA and was plainly discussed in both the Senate and House bill reports, basic legislative history documents.

In the Introduction to land protection, the NPS management policies state (chapter 3, emphasis added):

The National Park Service will use all available authorities to protect lands and resources within units of the national park system, and the Park Service

will seek to acquire nonfederal lands and interests in land that have been identified for acquisition as promptly as possible. For lands not in federal ownership, both those that have been identified for acquisition and other nonfederally owned lands within a park unit's authorized boundaries, the Service will cooperate with federal agencies; tribal, state, and local governments; nonprofit organizations; and property owners to provide appropriate protection measures.

To fulfill this obligation, GGNRA needs to cooperate with these entities, including nonprofit community groups and property owners adjoining GGNRA, to protect recreational resources. As Management Policy 1.4.3.1 directs:

Where there is strong public interest in a particular use, opportunities for civic engagement and cooperative conservation should be factored into the decision-making process.

GGNRA is aware of the strong public interest in dog walking access, and of the interest of San Francisco and Marin Counties and responsible community and nonprofit organizations in cooperative conservation. It is entirely inappropriate and contrary to these management policies to close new lands to dog walking access without first providing opportunities for this civic engagement and for cooperative conservation efforts.

In conclusion, there is no basis in existing law or adopted policy for the NPS and the GGNRA dog management plan to summarily reject and fail to preserve and maintain an important recreational use on new lands that is allowed on existing lands, particularly in advance of sound environmental review and land use planning. This Plan and Draft Plan/DEIS do not provide this review and planning, because by definition, new lands have not yet been fully studied, acquired or subject to the level of site specific review required of this EIS.

For reasons noted above, it is inaccurate wrong to treat dog walking as the establishment of a "new use" in GGNRA, which would be the result of the proposed policy. We understand GGNRA's desire to create a presumption against continuing this use, however, there is no factual, legal, or management policy basis for this approach.

*Recommendation,. The preferred alternative should be revised to make clear that new lands will be treated the same as any other GGNRA lands and follow the same NPS management policies. Recreational uses should be allowed to continue except as may be regulated through site-specific public land planning processes and associated environmental review.

4. Lack of Specificity in Proposed Action

The description of Elements Common to Action Alternatives (pages 63-67 in the Draft Plan/DEIS) describes the proposed 75% compliance standard and secondary management response, but does not provide details of the monitoring plan or other elements of an adaptive management plan on which the management response would be based. The draft Plan/Draft Plan/DEIS does not propose an adaptive management component that meets applicable guidance and that can be meaningfully reviewed, as called for in NEPA procedures and current Council for Environmental Quality (CEQ) mitigation and monitoring guidance (January 2011), including but not limited to pages 9-11 and pages 13 and 19 (on the role of the public in the design and review of results).

Select examples:

- a. The Draft Plan/Draft Plan/DEIS states (page 1725) that "the compliance-based management strategy is an important and effective tool to manage uncertainty when proposing new action" and "has been created" to assure successful implementation and long-term sustainability. However, the detailed description of this critical element has not been conveyed and is not included in the document (as noted on page 64).
- b. The Draft Plan/DEIS doesn't establish how or why a special-status species that has been sharing habitat with dogs for decades will experience an actual, likely benefit from stricter dog management, given other factors affecting the species.
- c. Where management actions that limit recreational access are proposed or under serious consideration, the Draft Plan/DEIS should also disclose whether access will be limited for people as well as dogs. The evaluation of significance under NEPA requires consideration of context and intensity. Meaningful public comment on proposed management measures is not possible without full disclosure of the impacts to all users and potential management measures.

*Recommendation, To address this deficiency, the NPS should fully disclose the details of the proposed action. It should describe how it will monitor compliance and resources and values at specific sites because the management measures are specific to GGNRA sites. In addition to assessing the condition of these resources and values, monitoring should also focus on determining the contribution to those conditions from other users and factors, including other human users and natural processes. This should be implemented as part of each alternative. Only through this objective monitoring approach can the GGNRA demonstrate that it has addressed the purpose and need on which the Dog Management Plan is based. Existing or

proposed management strategies should be modified based on the objective monitoring results. Although it could be appropriate to use properly measured rates of compliance as an indicator, the draft Plan and Draft Plan/DEIS does not provide adequate information about the compliance-based program. To ensure objectivity, this monitoring should be conducted by an independent qualified third party with the results discussed with interested groups and made publicly available as part of a defined and technically-sound adaptive management program. Additional recommendations on management actions that should be considered by the NPS are provided below.

Concluding Comment

In conclusion, we find this draft Dog Management Plan/EIS extremely biased against dogs, with insufficient documentation to support that bias. It appears that the GGNRA's goal is to restrict dogs to the maximum extent possible, in spite of congress' mandate in the authorizing legislation to preserve and encourage recreation, including dog walking. We hope that the final plan will take our comments to heart, and provide more areas for dog walking, both on leash and off leash, within the GGNRA.

Sincerely,

Bill Bechtell President, Montara Dog Group

Cc: U.S. Senator Diane Feinstein U.S. Senator Barbara Boxer
Congresswoman Jackie Speier U.S. Representative Nancy Pelosi
Congresswoman Anna Eshoo State Senator Leland Yee State
Assemblymember Jerry Hill Secretary of the Interior Ken Salazar National
Park Service Director Jon Jarvis National Park Service, Pacific West Region
U.S. Environmental Protection Agency, Region IX Enclosures: Appendix
A: Hybrid Alternative Appendix B: Recreation Resources ' Suggested
Annotated Outline Appendix C: Additional Comments Related to Appendix
G, "Law Enforcement Data" Appendix D: Additional Comments Related to
Draft Plan/DEIS Analysis of Geology and Soils Appendix E: Additional
Comments Related Draft Plan/DEIS Analysis of Water Quality Appendix F:
Additional Comments Related Draft Plan/DEIS Analysis of Biological
Resources Appendix A

Hybrid Alternative

Instead of the GGNRA's preferred alternative D for New Lands, i.e. "No dog walking allowed unless opened by GGNRA Compendium," we recommend a modified version of Alternative A, No Action. New Lands, however, do not fall under the 1979 Pet Policy or the GGNRA Compendium, and therefore existing uses, including off-leash dog walking,

should continue to be allowed until scientific studies prove that they are harmful to the environment.

Appendix B

Recreation Resources ' Suggested Annotated Outline

Affected Environment

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

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

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

Environmental Consequences

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

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

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

disclose this impact. Thus, the recreation resources section of the draft EIS should consider impacts related to the loss of recreational opportunities and access to nearby recreational facilities with detailed explanations for all conclusions.

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

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

Appendix C

Additional Comments Related to Appendix G, "Law Enforcement Data"

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

The Appendix G reference document consists of a two-page summary of the numbers of incidents for two years (2007 and 2008), organized by incident type and location. The document does not provide rationale for why it chose

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

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

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

NEPA further requires that, "When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking (CFR 1502.22)." When information is incomplete or unavailable, the agency must obtain the information, unless the cost to obtain the information is unreasonable. In that case, the EIS must state that the information is incomplete or unavailable and identify the relevance of the unavailable information to the evaluation. The Draft Plan/DEIS does not acknowledge the incompleteness of the data provided, or in any way factor in the limits of the available data to the findings made.

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

examples of how this source document is misused, and as a result, the document's findings are flawed.

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

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

On pages 229-230, the document states, "In addition to vegetation and wildlife management activities, the park collects data regarding the frequency of disturbance to wildlife and habitats at GGNRA sites. Wildlife species and their habitats are currently being affected by dogs at this park, which has been documented by reports taken and warnings and citations issued (all referenced to as incidents) related to dogs in closed areas and disturbing wildlife at GGNRA (appendix G)." The conclusion that wildlife and habitats are "currently being affected by dogs at this park" cannot soundly be based on the numbers provided in Appendix G. Appendix G does not provide evidence of what type of disturbances have occurred, or the level of significance that the documented disturbance actually has. Again, a

methodology for how the document drew its conclusions based on the data presented must be presented.

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

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

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

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

Correspondence ID: 4410 **Project:** 11759 **Document:** 38106
Received: May,20,2011 00:00:00
Correspondence Type: Letter

Correspondence: Comments on GGNRA Draft Dog Management Plan DEIS

To: Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

From: Harvey Allan Ridley & Helen McKenna Ridley San Francisco, CA 94117

Dear Superintendent Dean,

We write in support of adopting a Dog Management Plan for the GGNRA.

Our interests in the GGNRA are as San Francisco residents, a frequent park visitors and a volunteers participating in wildlife monitoring and stewardship activities. We enjoy the park for the unique opportunities to experience the natural and cultural resources and I appreciate the values of our National Park System.

We concur with the assessment that the natural and cultural resources and park visitor experiences have been, and continue to be, negatively impacted by the presence of substantial quantities of domestic dogs, both on-leash and off-leash, within the GGNRA. On many occasions my own park experiences have been negatively affected by the presence of dogs. We have had personal conflicts with dogs and their angry/defensive owners/guardians as well as being witness to conflicts between dogs and wildlife.

While we am supportive of many aspects of the Preferred Alternative, We have the following comments to offer:

General Comments

Commercial dog walking should not be allowed. Commercial dog walking does not relate to the purpose and mission of the National Parks. Commercial dog walking provides no service or benefit to park users, has negative impacts on park resources and park visitors, and serves only for the capital gain of private enterprises at the expense of the American public. Commercial dog walking will require additional annual expenditures for administering and overseeing a permitting process, additional law enforcement, additional resource maintenance and additional public relations.

The DEIS estimates that over 1000 dogs will be commercially walked within the GGNRA daily (p. 63 p. 276). Commercial dog walkers, with up to six dogs, will negatively impact the experience of park visitors on trails and in other areas of the park. If permitted, commercial dog walking activity will increase within the GGNRA and will displace park visitors, of all

legitimate user groups, from areas of the park. Commercial dog walkers will dominate the ROLAs, displacing other park visitors. Commercial dog walking vehicles will occupy parking spaces resulting in fewer spaces available for park visitors. If allowed, commercial dog walking operations will have a dominant presence in some areas of the park thus affecting the overall character and ambiance of those areas.

Currently, commercial dog walking is not permitted within the GGNRA or any other National Park unit and there is no justifiable reason to do so. The NPS is well within the scope of its management directives to not allow commercial dog walking and I support this position.

Park visitors should be limited to one dog per visitor. On trails, visitors with more than one dog have a wider space requirement and have the potential to impact other park visitors by impeding their progress along the trail. In ROLAs, it is not practical to allow voice control of more than one dog per person. With few exceptions, dog handlers are not capable of managing more than one off-leash dog at a time.

The proposed compliance percentage of 75% is too low. Given that many hundreds of dogs are walked within the GGNRA daily, a 25% non-compliance tolerance would create a situation where park resources are significantly negatively impacted. The expectation should be that non-compliance is a rare occurrence and the compliance strategy should reflect that in its standard. The standard of compliance should be the same as for any other park rule or law. An acceptable rate of compliance is somewhere near 100%.

A simple and effective reporting system should be established. The dog management plan should include a means by which park visitors can easily and effectively report non-compliant behavior. Park visitors are sometimes reluctant to report observed violations due to the time involved in making the report. A public reporting system should be incorporated into the plan that will be user friendly and workable. Such a system should require only a few moments of time and be an effective documentation of the violation.

The plan does not provide an adequate amount of hiking trails and picnic areas where visitors can enjoy a dog-free, National Park quality experience. Within San Francisco, the plan provides no significant area where park visitors can spend the day hiking and/or picnicking in a dog free environment. A solution to this problem would be to designate all of the coastal bluff areas, from the Golden Gate Bridge to and including Baker Beach, as a dog-free zone.

Sites Specific Comments

Ft. Mason ' We support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Field WPA ' The DEIS indicates that the east boundary fence will be relocated 200 feet eastward at a position 900 feet from the NOAA pier (p. 60). The language of the plan should allow the National Park Service flexibility in determining the exact location of the fence and consideration should be given to the visual penetration effect as well as the geographical conditions of the immediate area.

Under the preferred alternative, off-leash dog activity directly adjacent to the east boundary fence will pose a visual threat that will penetrate into the Wildlife Protection Area, effectively rendering a portion of the eastern WPA as non-viable habitat during daytime use hours. Given this concern, the fence should be placed a reasonable distance eastward, beyond the actual 900 foot border line, to allow for an adequate buffer zone.

Additionally, the geography of the area if fence placement is somewhat complicated by non-uniform conditions which include a variety-of substrates, varying elevations, several lobes of fenced dune habitat areas, and a variety of pedestrian pathways. Consideration should be given to all of these conditions and fence placement should be such that will accommodate ease of pedestrian traffic flow while maintaining adequate protection of the WPA.

When installed, the fence should extend to the water at extreme low tide.

Crissy Central Beach ' The Central Beach ROLA should be fenced and gated. Fences at the west and east ends should extend to the water at extreme low tide. Adequate buffer zones (-300ft) should be included beyond the west and east boundary fences to protect the WPA and the lagoon outlet from the influences of excessive dog play activity. Access points from the promenade should be gated. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Crissy East Beach ' Fencing should be installed to protect the lagoon outlet zone. Outlet areas from bodies of water into bays or oceans are of high habitat value. The outlet zone should be included as part of the protected lagoon area and similarly fenced.

Crissy East of the Lagoon ' The Freshwater Swale should be designated on the area maps as a no dog zone.

Crissy Promenade ' I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Airfield ' The foot paths that cross the airfield are multi-use trails and should be designated as on-leash areas. Allowing off-leash dogs on the airfield trails will lead to user conflicts. The airfield ROLA should have some type of physical barrier along the boundaries. A physical barrier will clearly define the ROLA area. Clearly defined boundaries will maximize compliance and minimize conflict. Consider a movable barrier that can be set up and taken down as needed. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules. Ft. Point 'We support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Baker Beach 'The Preferred Alternative for Baker Beach is problematic for several reasons. Splitting the beach into leash-only and no-dog areas will lead to confusion, non-compliance, visitor conflict and continued management problems. Furthermore, allowing dogs near the creek outlet, an area often used by shorebirds, will increase the potential for wildlife conflicts. As a means of eliminating these problems and of creating more opportunities for visitors to enjoy dog-free National Park experiences, I suggest designating the entire Baker Beach area as a dog-free zone,

Lands End ' We support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Sutro Heights Park ' We support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Ocean Beach 'We support the Preferred Alternative for Ocean Beach. To improve upon the Preferred Alternative, I suggest using symbolic fencing and adequate signage to delineate the south border of the ROLA. A simple post and cable fence could be placed along the border from the sea wall to the plover sculpture. A well defined border will help to reduce compliance problems and visitor conflict. Additionally, I suggest changing the name "Snowy Plover Protection Area" to "Wildlife Protection Area". A designation of Wildlife Protection Area would be inclusive of all wildlife

species that use the beach habitat area.

Ft. Funston ' We support the Preferred Alternative for Ft. Funston. To improve upon the Preferred Alternative, I suggest installing a fence, with access gates and adequate signage, along the border of the ROLA north of the main lot. A borderline fence will clearly delineate the boundary of the ROLA and will minimize compliance problems and visitor conflict. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Additionally, We suggest aggressively restoring the coastal scrub habitat throughout Ft. Funston. Plant and animal species, as well as park visitors, have been displaced from Ft. Funston over time as dog play activities have increased. A proactive effort must be made to bring back the visitors who are interested in proper stewardship of this area of the park.

Yours truly,

Harvey Allan Ridley & Helen McKenna Ridley

Correspondence ID: 4411 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Point Reyes Station, CA 94956

Frank Dean, Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Dear Frank Dean,

How do I explain the pure joy of watching your dog run on the sand and in and out of the water on the beach? For so many of us our relationship with our dog is the strongest and often the first bond with the animal world. It is often from this relationship that we learn more of the non,verbal animal realm and deepen our respect for it.

When we consider the question of dogs on the beach running free, it is not an either or situation of the dogs or the environment. We are part of the environment and our dogs are also. All should be able to exist with care and balance. We are not on the outside looking at the environment behind a barrier. "We are all part of the environment. We have to learn how to take care of each other in order to learn how to take care of all that surrounds us."
(John Francis)

My dog is "my other" and caring for her is letting her run and play, in the sand, in the water, with other dogs. Again, all should be able to exist with care and balance. just as I treasure the plovers that nest in specific areas and don't want to lose this species, in the same way, I don't want to be in a world where there is only the artificial situation of dogs running the short length of a leash, never really playing with another dog but instead, getting tangled in twisted leashes between two dogs, (and often dogs on leashes because of fear are more aggressive) or eventually seeing only tiny dogs being carried or in protected strollers. There are fewer and fewer places where dogs can run free.

Dogs are one of the only species that help care for us. As service dogs for the blind, the deaf, the paralyzed, dogs take care of us. As search and rescue dogs, they take care of us. In the military, dogs help protect us, (a dog was part of the seal team in the Osama Bin Laden raid). As therapy dogs for sick children or the very old in convalescent homes, they take care of us. Dogs take care of us as much as we take care of them. For this reason alone, we should honor them and let dogs have places to play as dogs, running free as well as working, often putting their lives in danger for their humans.

"The 'environmental crisis' is an outward manifestation of a crisis of mind and spirit. There could be no greater misconception of its meaning than to believe it to be concerned only with endangered wildlife, human-made ugliness, and pollution. These are part of it, but more importantly, the crisis is concerned with the kind of creatures we are and what we must become if we are to survive." (Lynton K. Caldwell)

I think the more we truly understand we are part of the environment and our dogs are also, the more we will tread gently, being responsible with and to our companion dogs, as well as to all the wildlife that we thus understand we are connected to. "What is man without the beasts? If all the beasts were gone, men would die from great loneliness of spirit, for whatever happens to the beasts also happens to the man ' we are connected." Chief Seattle

Thank you for your consideration for all of the wildlife including the dogs and their humans. Very Sincerely,

Carol Molly Prier

Correspondence ID: 4412 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Christina M. Gwatkin San Frnacisco, CA 94123

May 20, 2011

Dear Mr. Dean,

Our family has enjoyed the companionship of two dogs during our time in San Francisco, (one of whom died in 1989, and the other who is currently eight years old,) and have therefore had the pleasure of walking our dogs in the GGNRA at Chrissy Field, Ft. Funston, and Ft. Mason for almost twenty five years.

I have reviewed the proposed plan, and, although many aspects the so called 'preferred alternatives' appear to be fair and sensible, I believe the following restrictions to be arbitrary, illogical and unnecessary:

Chrissy Field AIRFIELD: It is both impractical and illogical to limit the proposed ROLA to the center section of the airfield. 1) The east section of the airfield lies between two proposed ROLA's which will cause confusion and require the park service to put up signs or fence off the area. 2) The walkways along and through the east section of the airfield provide access to the Central Beach proposed ROLA 3) It is impractical and illogical not to have a contiguous ROLA 4) The east section of the airfield is not a high traffic area for either people, dogs or wildlife (unless you count gophers) 5) Corralling all dogs into one section of the airfield will overtax that section of land 6) If the concern is simply to craft a compromise between those who wish to allow dog access to the airfield, and those who don't, then time restrictions, rather than area restrictions, would be a more sensible way to do so. (The area would only need to be patrolled for a portion of the day, which would, of course, result in some cost savings to the government.)

EAST BEACH: Time restrictions would accomplish objective

Although I personally don't walk my dog on East Beach, I again think that time restrictions are a better way to manage any perceived conflict in useage, particularly since there is rarely anyone there in the early morning (even on nice days!)

PROMENADE: Time restrictions would accomplish objective.

Again, although there are times (for example on a sunny week-end day) when the promenade is crowded, MOST of the time there are very few people there, particularly in the early mornings and late afternoons, when the majority of the people take their dogs out. Why not allow people to run or walk their dogs off leash during these times of day? Fort Funston

PAVED ROADS: Dogs do not cause damage to pavement Although it is

understandable for the park service to want to keep dogs out of a portion of the dunes, allowing dogs off leash on the paved roadways does not result in environmental damage. From my observation of people walking dogs in Ft. Funston, 99% of dogs and owners stay on the paved roadway.

PROPOSED ROLA AREA: Keep dogs away from cars The plan shows the proposed ROLA to be next to the parking lot. It makes no sense for dogs to be off leash in close proximity to cars, and on leash when they are away from them. The decision to limit the ROLA. to this area is absurd!

Ft. Mason

ELIMINATE LEASH REQUIREMENT IN THE GREAT CIRCLE

I have walked my dog on leash at Ft. Mason, and have no idea why dogs are required to be on leash in the great circle. At least during the weekdays, the area is practically unused, and would provide a great place to allow a dog to exercise off leash.

PROPOSED ROLA SHOULD BE SOUTH SECTION OF CIRCLE

I noticed that one of your proposals (although not the preferred proposal) would allow for a ROLA at a section of the park. I applaud that proposal, but would suggest that either, the entire circle be allowed for dog use, or that the section designated for the ROLA be the area of the great circle near the restrooms where the water fountains are located, as this area (in my experience) is less used than the section that leads between Ft. Mason and Aquatic Park.

In closing, the people of San Francisco have been walking their dogs off leash in the above areas of the GGNRA for over a quarter of a century. I, therefore, object to the fact that the Government is attempting to impose arbitrary and unnecessary restrictions on Off Leash Dog Walking in the above areas of the GGNRA. Clearly, if restrictions must be imposed, then time restrictions would be the most equitable. The fact that such a solution was not considered by those preparing this voluminous report highlights the arbitrary and capricious nature of these restrictions, and I therefore, respectfully request that they not be enacted.

Very Truly Yours, Christina M. Gwatkin

Correspondence ID: 4413 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter

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

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

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

The examples above are not an exhaustive list of all instances where

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

? Provide details for incidents in Appendix G (specific location, nature of incident) and source data. ? Where the first reference to Appendix G is made, the document should not only reference but also summarize the data contained therein. ? Clarify why 2007/2008 years were chosen. ? Provide data for a broader range of years. ? Provide methodology for interpreting/determining the significance of the data. The NPS should provide thresholds for analyzing the incident data, by type, and by GGNRA site. The NPS should clarify what number of incidents is considered acceptable or unacceptable, again, by site and by incident type. The NPS should describe their rationale for determining proposed thresholds (i.e. in context of number of visitors per year to each site). By providing a methodology for analyzing the data shown, the EIS will be able to properly describe the significance of the data, and use the data to support (or not support) its findings. ? Provide clear evidence in the record to support all of its findings. The NPS needs to ensure the professional integrity, including scientific integrity, of the analysis and findings contained within its Draft Plan/DEIS. ? Review all instances where Appendix G is referenced in the Draft Plan/DEIS and make revisions to ensure the findings are based on clear evidence in the record. Revisions to the methodology, the analysis, and the findings, as noted above, should be to be corrected throughout the entire document, wherever such analysis or conclusions relies on the data in Appendix G. ? The NPS should take all reasonable steps to obtain and disclose the information that the Draft Plan/ DEIS is currently lacking. Where there is incomplete or unavailable information, the Draft Plan/DEIS must clarify that the data is lacking, and identify the relevance of the unavailable information to the evaluation, and especially to the analysis of environmental consequences. ? As a result of the revisions to the analysis and findings noted above, the analysis of the alternatives needs to be reassessed where proposed alternatives are not substantiated by clear evidence in the record. Proposed management measure such as closures or significant reductions in access to people with dogs in areas of the GGNRA should be revised. As currently written, the data provided in Appendix G do not support the management measures proposed in the document, and therefore the alternatives need to be modified. Appendix D

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

Chapter 3: Affected Environment

General:

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

Executive Summary, Environmental Consequences, pages xv-xxiii:

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

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

Page 109 (Stinson Beach, Soils and Geology). Under Alternative A the second bullet identifies long-term, minor, adverse impacts in areas outside parking lots and picnic areas. These impacts are not repeated under the other alternatives despite the fact that, except for Alternative D, the management strategies under all of the alternatives are identical for Stinson Beach. Furthermore, each of the statements in the first bullet, except for No Action, includes the clause "assuming compliance," conveying the understanding that perhaps compliance can't be assumed under No Action. At least for the soils and geology evaluation, the analysis seems to take it for granted that the No Action Alternative is inferior. Both of these are examples of biasing the analysis against No Action. In the same table, under Alternative D, in

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

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

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

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

impacts would not differ. In most areas, this is the only realistic conclusion. It should not be assumed that the imposition of more rules will lead to fewer impacts. And yet this is apparently the assumption underlying the soils and geology impact analysis.

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

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

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

General Comments

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

the message conveyed by the photo and the text is that dogs are impacting this fragile environment. This is propaganda, not science.

This Draft Plan/DEIS is about making a change to rules about dog use. Therefore, in order to be useful in this regard, the Affected Environment discussion must present information about how the environment has been impacted by dogs, and not just by dogs but also by humans. The Draft Plan/DEIS does not present baseline conditions that require a change in the rules. The Affected Environment discussion is silent. Perhaps an aerial photo of the bluffs at Fort Funston and the adjacent areas would help to provide perspective and tie in the discussion of plate tectonics and landforms. An aerial photo would indicate that these bluffs are undergoing slope failure and rapid erosion on a very large scale, such that the localized contribution from humans and dogs is insignificant. The impacts on geology should be presented fairly and impartially, with an eye toward using the information provided in the Affected Environment section as the foundation for the impact analysis and alternatives comparison. As it is written, the Affected Environment is little more than a catalogue of the soil complexes of Coastal California, which the reader can obtain from the internet or from browsing through Roadside Geology.

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

Regardless of whether dogs are allowed on the bluff trails to the beach at Fort Funston, the GGNRA is going to have to address the coastal bluffs during a winter storm or as sea levels rise and erode the toe of the slope. One look at the aerial photo might put the notion of maintaining stasis into budgetary perspective. Instead of presenting truisms, the Affected Environment should provide the reader with information that would help dog walkers understand that taking an alternative route to the beach would have some beneficial effect on soils and geology. In fact, non-native Americans have been impacting the coastal dunes and bluffs for more than a hundred years. Perhaps, from a geological perspective, it is no coincidence that there is a broad, sandy beach below Fort Funston. Is the beach broader, or less broad, as a result of dogs accompanying their owners on the trails to the beach? The Affected Environment should discuss and put into

perspective the impacts that past uses have actually had and not leave off stating that the sand is soft.

3. The discussion of soils is especially generalized in the Affected Environment section. However, it suggests that within some of the sites there are specific areas underlain by fragile or vulnerable soils that could be impacted by uses, including dogs. In order to be useful, maps are needed that would indicate the areas of these vulnerable soils, as well as the areas with steep slopes that are prone to accelerated erosion. This information would also help to support the discussion of vegetation and perhaps other sections of the Draft Plan/DEIS. The soils maps should indicate the trails. If possible, areas of existing impacts should be portrayed. Maps would not only give the reader the ability to locate the vulnerable areas relative to use areas, but also to understand the size of these areas relative to the size of the areas where change in management is proposed. Areas of serpentine soils should be specifically shown on the maps, because they are called out in the text.

4. Rare Soils at Golden Gate National Recreation Areas, paragraph 2, page 225. The text indicates that serpentine soils can be found at certain locations that are listed. This suggests that these are the only locations where serpentine soils are found, and that should be clarified. The locations listed are Muir Beach, Crissy Field, Baker Beach, and Lands End. Showing these areas on a map would be helpful. In addition, it would be helpful to elaborate on which current dog use areas are specifically affected and why. At Muir Beach, for example, the serpentine soils are outside the study area. The Draft Plan/DEIS should discuss serpentine soils at Muir Beach and other sites only if the information is directly relevant to the study area and the impact analysis.

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

At Baker Beach, the text says that serpentine soils are located on the coastal bluffs between Baker Beach and the Golden Gate Bridge. Looking at Map

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

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

5. Alteration of Park Soils (page 225) The second paragraph makes the assertion that:

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

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

hikers, runners, and dog walkers."

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

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

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

that intensive dog use occurs in the small areas containing serpentine soils. Unless better supported or more focused on the specific areas where it may occur, the discussion of impacts of dog use on soil chemistry should be abandoned, and replaced with more substantive discussions of the Affected Environment.

Chapter 4: Environmental Consequences.

Soils and Geology, pages 291-458:

General Comments

6. Study Area (page 291) The study area is defined as "the area that could be impacted by dog management activities..." Presumably, this means the entire area within the green line boundaries shown on the maps. However, in practice, the focus of the analysis should be on the specific areas affected by the alternatives, where impacts from dogs may change. In most cases, this is small percentage of the total park areas. Contrary to the statement in this paragraph, the individual study areas have not been described in detail in Chapter 3. It would be helpful to clarify that the alternatives would alter management in selected portions of the study area, and as indicated in earlier comments, to quantify those areas in terms of acres and miles of trails affected by management.

7. Duration of Impact (page 291) As described, the duration of impact does not seem to apply to the No Action Alternative. While this may seem like a small matter, it appears to be based on the unstated assumption or bias that the No Action Alternative is not feasible. It may be accurate to state that the existing conditions will continue during the education and enforcement period of an adaptive management plan. However, the assumption that impacts will become long-term (described as persisting for the next 20 years) is also not supported, given the lack of specific information on the Affected Environment and Environmental Consequences sections, as explained in these comments.

8. Assessment Methodology (pages 291-292) This section explains that professional judgment was relied upon in determining impacts, due to lack of site-specific scientific data regarding effects of dogs on soils within the GGNRA. However, in the last paragraph it is asserted, as an example of processes that would occur as a result of various management activities, that heavy dog use on interrupt natural dune processes and accelerate coastal bluff erosion. The choice of words (would, can), the degree to which professional judgment is involved versus knowledge of the impacts that dogs do have versus those that they can have, and the lack of quantitative analysis overall, is confusing. Even the reference to lack of site-specific scientific data is unspecific in its scope. Although there are degrees of

reliability of data, methods can be found to do a better job of quantifying the existing impacts of dogs.

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

9. Impact Thresholds (page 292) The impact thresholds are critical to the outcome of the analysis, and the impact thresholds described in this section provide a great deal of leeway to the analyst. In the first paragraph, a beneficial impact is defined as "a positive change in the condition or appearance of the resource." Presumably, an adverse impact would be a negative change in condition or appearance. However, no further explanation is provided as to how appearance of soils and geologic resources should be considered. The photo of the footprints in the sand on the bluffs (page 222) at Fort Funston provides an ominous clue as to how the appearance of the resource might influence the analysis. As discussed in an earlier comment, the photo is used to illustrate the soft sandy "soils" on the bluffs, which are obviously easily eroded by hikers, dogs, rodents, and reptiles. If appearance is a threshold criterion, then more footprints, however short-lived, could easily be equated with greater adverse impact. If appearance of soils is to be used as a threshold criterion then a great deal of discipline must be exercised by the analyst to avoid any tendency to associate footprints in sand with an adverse impact on soils and geology. It would be preferable to avoid the appearance criterion altogether, and to provide a more thoughtful definition of what exactly constitutes a "change in condition" of soils (whether adverse or beneficial).

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

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

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

As discussed below, lack of a definition or bounds on what constitutes adverse soil disturbance is a weakness of the analysis, which might either be rectified by carefully defining the term, or by avoiding its use altogether due to its inherent vagueness. Soil compaction and soil erosion are distinct processes, though their causes and secondary effects may overlap. This might become clearer if each were defined. To conclude that in general, a decrease in soil erosion would be considered beneficial is far too simplistic. Under natural conditions, erosion is essential and inevitable on every surface exposed to weathering. Like wind and rain, rates of erosion can vary widely over time, as well as by material and location. For example, areas with rapid natural rates of erosion, such as the bluffs at Fort Funston, tend to support fast-growing, resilient vegetation. There are hollows and landings within the bluffs that are stable enough to support trees, but most exposed slopes fail so frequently that trees cannot become established on them. To simply assert that a decrease in erosion at Fort Funston would be a beneficial impact is not meaningful. The Impact Thresholds discussion should provide greater clarity. This level of specificity is also needed to consider, for example, why off leash dog access is prohibited even on an inland trail.

Soil function is a potentially broad category, which certainly needs to be

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

10. Potential Soil Impacts Common to All Alternatives (pages 292-293) It is not entirely clear what this section is intended to accomplish, and it would be helpful if there were a brief introduction in this section to explain what it is for.

11. Cumulative Impacts to Soils that are Common to All Alternatives (pages 292-293) As with the preceding section, the purpose and direction of the cumulative impacts common to all alternatives discussion is unclear and unfocused. It does not discuss the cumulative effect of redistribution of dog use throughout the region in response to increased restrictions on dog use and changes in demographic patterns of dog ownership, which is perhaps the most important adverse cumulative effect.

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

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

12. Compliance-Based Management Strategy (pages 295-296) The compliance-based management strategy discussion is part of the project description and should be fully described there. Although it is useful to reiterate the components of the strategy in the resource impacts section, the section here does not adequately focus on impacts on soils and geology. As

explained in this section, the strategy would lead to increased restrictions on dog use if noncompliance exceeds threshold criteria measured by observation of noncompliance. 13. Marin County Sites ' Stinson Beach (pages 296-302) The following comments on the Impact discussion for the Stinson Beach area are generally applicable to all sites.

Alternative A: No Action (page 296). The text states that there is low compliance with the no dog walking restriction on the beach and refers to Table 9 (page 271) as support for this assertion. The information provided in Table 9 and its accompanying text could just as easily be interpreted to support the opposite view, however, that compliance is exceptionally high given the intensity of use. It is unclear what effect on compliance the use of the adjacent beaches might have. (The text accompanying Table 9 incorrectly identifies the Marin County beach adjacent to Stinson Beach - called Upton Beach - as allowing dogs off-leash. Dogs are allowed on this beach on-leash.) According to its website, dogs are not allowed on the beach adjacent to the southeast of Stinson Beach (within Mt. Tamalpais State Park). However, this short stretch of beach is poorly accessible except from Stinson Beach or Upton Beach.

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

Alternative A: No Action ' Cumulative Impacts and Indirect Impacts on Adjacent Parks (pages 296-298). The cumulative impact analysis oversimplifies when concluding that because long-term and ongoing restoration and enhancement efforts, etc., would be beneficial to soils and geology, that the cumulative impacts on soils and geology would be low. Instead, the cumulative analysis should also consider the potential for concentration of effects within smaller areas, especially in the event that noncompliance monitoring leads to greater restrictions being imposed on dog use at Stinson Beach and other areas.

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

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

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

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

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

14. Mann County Sites ' Homestead Valley (pages 301-307)

Alternative A: No Action (page 301) The Homestead Valley impact analysis is the first unit in this section that presents a discussion comparing impacts of No Action (which allows off-leash use) with the action alternatives, (none of which now allow off-leash use). The text states that "Even though this site has low visitor use and low numbers of citations and incident reports related to dog activities, soil compaction and nutrient addition and possible erosion from dogs is assumed to be currently happening along the fire road/

trails and in off-trail areas throughout the site." This statement indicates that no evidence of impacts of dog use is needed in order to conclude that the No Action Alternative has adverse impacts on soils and geology.

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

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

Appendix E

Additional Comments Related Draft Plan/DEIS Analysis of Water Quality

Chapter 3: Affected Environment

1. General ' the Draft Plan/DEIS should include a map that shows both the locations all bodies of water discussed in the water quality sections and dog areas categorized by currently allowed activities. Add a "Marin County Sites Map", "San Francisco County Sites Map", and "San Mateo County Sites Map" showing both water resources for those areas and existing dog areas categorized by currently allowed activities.

2. General ' there seems to be a lack of historical or current information connecting dog use of the parks to resulting changes to water quality. The Draft Plan/DEIS should provide site-specific information documenting this connection. For instance, the Stafford and Home report cited on page 227 attributes high bacteria and nutrient levels to five sources, in addition to dogs. At the bottom page 227, the Draft Plan/DEIS asserts that the eastern third of Crissy Airfield "receives a moderate to high level of use by off leash dogs and has substantial amounts of pet waste", but there is no reference to

support this claim. There is no site-specific analysis linking the presence of waste to documented water quality issues at this site and no objective monitoring data that supports a moderate to high use of off leash dog use in this area.

3. General ' the water quality section in Chapter 4 discusses each of the 21 sites individually. The Draft Plan/DEIS should follow a similar format in Chapter 3. For example, provide a description and characterization of the water resources for each of the 21 sites.

Chapter 4: Environmental Consequences

1. General ' the Draft Plan/DEIS should be clear under all of the analyses for Alternative A that the impacts would not be new, but rather a continuation of existing/ongoing impacts due to the existing approach to implementing the current GGNRA general management plan.

2. General ' The Draft Plan/DEIS should also be clear in this and other sections that the impact analysis presented for Alternative A is different than the consequences of the No Action alternative were GGNRA to implement an education and adaptive management program under its current plan and policies, which GGNRA could choose to do. The No Action alternative for a management plan is not the same as a "do nothing" alternative. GGNRA can choose to implement its existing plan is a more effective way to meet the purpose and need for the proposal.

3. General ' when impacts are the same across various alternatives for a particular site, the Draft Plan/ DEIS should be revised so that the Conclusion Tables contain identical statements.

4. General ' the Conclusion Tables should be grouped together for each site. This would make comparing the various alternatives for each site easier and make the tables more useful.

5. Page 459, last paragraph, states "Impact at the most would be negligible; therefore, impacts to seeps and springs from dogs are not discussed further." If impacts to seeps/springs are not discussed further because the impacts are negligible, then why are there so many discussions in subsequent pages about negligible impacts involving other types of water resources? The Draft Plan/DEIS should be made more consistent by not discussing any negligible impacts in subsequent pages of the water quality section. 6. Page 460, Assessment Methodology the Draft Plan/DEIS should make an assumption under Assessment Methodology that the public would comply with park/dog regulations and requirements, then remove all of the "assuming compliance" (and similar) statements in the subsequent pages of the water quality section. Also, the Draft Plan/DEIS should provide

examples of park/dog regulations and requirements, such as being on leash or properly disposing of dog waste.

7. Page 460, Assessment Methodology ' the Draft Plan/DEIS should describe how impacts are analyzed qualitatively.

8. Page 468, Paragraph 1 ' is it possible for the increased use at adjacent parks to be concentrated at one adjacent park? Would "impacts on water quality in adjacent lands" still not be "expected to be higher than current conditions" if increased use was concentrated in a particular adjacent park? This comment should be addressed in all instances in the water quality section where this could occur.

Other Minor Corrections

9. Page 461, last two paragraphs ' the paragraphs beginning with "Dogs were determined..." and "A sub study..." seem more like paragraphs that belong in the affected environment section.

10. Page 462, Paragraph 3 ' delete "a" from "...from a many different sources."

11. Page 462, Paragraph 6 ' the Draft Plan/DEIS should provide citation(s) for information in the paragraph beginning with "Potentially adverse impacts..."

12. Page 465, Paragraph 5 ' the Draft Plan/DEIS should provide citation(s) for information in paragraph beginning with "Oil spills have..." This comment applies to all instances in the water quality section where this information appears.

13. Page 468-470, preferred alternative discussion ' this discussion seems unnecessary as it just repeats previously provided information. This comment applies to all instances in this water quality section where the preferred alternative discussion just repeats previously provided information.

Appendix F

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

Chapter 3: Affected Environment

General:

1. As stated in Chapter 1, use of GGNRA lands by humans and dogs occurred well before the GGNRA was established in 1972. This historical activity should have been considered as part of the Affected Environment. Many sections lack a description or quantification of baseline conditions of biological resources from long term use by people and dogs, or current impacts are assumed but no data or rationale are given (specific comments follow below). Without this baseline information, the impact conclusions in Chapter 4 and the basis for selection of the preferred alternative are not supported.

2. The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but without specific data as to where/if they are actually present, this claim is unsupported.

3. There are inconsistencies among the text and Table 8 in the special-status species affected environment, the information in Appendix H, and the impact analyses in Chapter 4. Examples include:

- o Presidio's manzanita. Table 8 states that it is documented within the GGNRA and the impact analysis states that it is found at Baker Beach, however Baker Beach is not identified in Appendix H as having potential habitat for this species.
- o San Francisco lessingia. This species is listed in Appendix H as having potential habitat within a number of San Mateo sites. Fort Funston and Baker Beach are not listed under San Francisco sites as having potential habitat; however, these two sites are the only two considered in the impact analysis of this species in Chapter 4.
- o Hickman's potentilla. There has been no documentation of this species within GGNRA. The table lists this species as having potential habitat at 5 sites within San Mateo County; however, the impact analysis in Chapter 4 is only for Mori Point and Pedro Point. What is the justification that these two were the only ones considered if habitat exists at many sites?
- o California seablite. Appendix H identifies this species as having potential habitat at Crissy Field and Land's End (which is missing from the table Key) and that this species has been documented within the GGNRA. The impact analysis in Chapter 4, only talks about Crissy Field and that reintroduction of the species has failed twice, so species is not currently present within the GGNRA.

4. Table 8, Affected Environment: GGNRA Location column contains the location for plants that do not exist there according to the text:

- o Lessingia ' does not occur at Fort Funston
- o California seablite ' does not occur at Crissy Field
- o Hickman's potentilla ' does not occur at Mori Point or Pedro Point

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

5. For wildlife species that are assumed to be impacted by dogs, the

Draft Plan/DEIS fails to establish the level of impact the species are already experiencing, apart from other factors that may be causing disturbances or population decline (within and outside of the GGNRA). This would include issues such as loss of breeding and foraging habitat, predation, climate change, etc. The Draft Plan/DEIS does not indicate how or why a special-status species that has been sharing habitat with dogs for decades will experience a quantifiable benefit from stricter dog management, given other factors affecting the species. For this reason, there is no support for the selected alternatives in terms of actual, foreseeable benefits to wildlife populations. Without this type of information, most impact conclusions in Chapter 4 are not supported. The western snowy plover section of Chapter 3 is a good example.

a. Additional comments on western snowy plover text from Chapter 3: The Draft Plan/DEIS does not adequately describe how dogs chasing the birds can impact the survival of the species. Birds may take flight readily and expend energy, experiencing some short-term disturbance, but there is no evidence of the GGNRA western snowy plover populations being directly impacted by dog activity in the long-term. The data provided in the Draft Plan/DEIS suggests a stable plover population; therefore, the selected alternatives would not be expected to differ from the No Action Alternative (see paragraph 1, page 799).

- Monitoring surveys from 1994-2006 observed 48 of leash dogs chasing western snowy plovers, which is a relatively low number of events over a 12-year period. As stated above, this information suggests snowy plover populations will not experience significant beneficial impacts from the preferred alternatives, and that the No Action Alternative does not significantly impair natural values. - The numbers of snowy plovers fluctuated between 1994-2006 "based on a variety of factors", but the presence of dogs on the beach has not prevented the birds from using their preferred resting areas at Crissy Field or their off-site nesting sites; therefore, there are no documented impacts to the population from a "chasing" incident.

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

Field and Ocean Beach. To this day, the Crissy Field Dog Group continues to inform their members and the public about protecting the snowy plover.

The comment is directed toward an example of scientifically unsupported assertions that the Draft Plan/DEIS as a justification for management actions. These become particularly critical when they are used as the basis for large closures of beaches and other areas where access has been allowed for the past 20-40 years without documented impairment of species.

b. Additional comments on mission blue butterfly text from Chapter 3: the text is not consistent with Table 8 ' text states that the species is found in Alta Trail and Tennessee Valley, but these are not listed in the table.

-There is no clear nexus between dogs and the mission blue butterfly habitat and host plant, and there is no evidence given of damage to the host plant from dogs. Because the area is fenced "but does not physically exclude dogs", the current and historic use of the area by does not appear to be detrimental to the mission blue butterfly or its habitat/host plant, therefore selection of the No Action Alternative is supported. -Mission blue butterfly habitat is "very near" closed social trails that are still used by visitors and dogs; however, there are no data to suggest alteration of the habitat. Because these trails are closed and their use by dogs is not quantified, the species' habitat does not appear to be impacted by dog use, and the No Action Alternative does not significantly impair natural values.

c. Additional comments on tidewater goby, Coho salmon, steelhead trout, California red-legged frog from Chapter 3: For each species it is indicated that the habitat areas are essentially closed to dogs, but that "these closures are not always followed". Presumably the use of these areas is rare. Because dog use of the habitat areas is not quantified, there does not appear to be a nexus between dog use and these wildlife habitat areas, therefore the No Action Alternative does not significantly impair natural values.

d. Additional comments on bank swallow from Chapter 3: The nesting colony is well monitored and closed to visitor access, and the nature of reported disturbances is unclear ("Fort Funston has moderate to high visitor use, and in 2007-2008 there were two pet citations, warnings, and reports taken related to wildlife disturbance at the site."). This small number of incidents over a two-year period does not appear to have affected bank swallow populations; therefore, the No Action Alternative does not significantly impair natural values, and no benefits from the draft preferred alternative are anticipated.

Vegetation and Wildlife, pages 228-244:

1. Pages 229-230, Paragraphs 4/5 and Table 6. The number of

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

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

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

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

Correspondence ID: 4414 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00

Correspondence Type: Letter
Correspondence: Mill Valley, CA 94941 May 17, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

RE: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

My name is Pavla Sim. I am a resident of Mill Valley, County of Marin, California. I have lived in this area for 17 years. I have a MBA with 20+ years of experience in the high technology industry. I have built a successful dog walking and pet care business in Mill Valley after my management position was eliminated in 2005. My husband, Leonard Hand, and I deeply care about the environment. In 2009-2010, my husband was the Treasurer of the Environmental Forum of Marin, an educational and training not-for-profit organization. We have installed solar panels on our roof; we recycle and participate in a composting program; and we use our cars only when necessary. As a responsible dog owner and dog walker, I completed a number of training courses to learn how to keep multiple dogs under voice and sight control at all times and I became certified as a dog walker. I diligently clean up after dogs and keep them out of areas where they are not supposed to be. I work hard to make sure that dogs under my control do not harass people, other dogs and wildlife.

I have reviewed portions of the Draft Dog Management Plan relevant to Marin County. I do not agree with some of the analyses and conclusions stated in Alternative A, the No Action option. I also disagree with the choice and rationale for most of the GGNRA's Preferred Alternatives as detailed in the Draft Dog Management Plan. The reasons for my objections and alternative recommendations vary by site, so this letter will focus on just one location, Homestead Valley.

Chapter 4, Environmental Consequences, Alternative A describes a No Action choice which would continue to allow access to dogs under voice control throughout the entire Homestead Valley site. In contrast, the Preferred GGNRA Alternative C would limit dog walking to no more than 3 dogs per walker, on-leash only, restricted to the Homestead Valley Fire Road and neighborhood connector trails "that would be designated in the future". This Preferred GGNRA Alternative represents a dramatic reduction of access to dog walkers and their dogs in Homestead Valley. The analysis for not keeping Alternative A (No Action) is based on conjecture and flawed assumptions made by someone clearly not familiar with this area who may

not have even visited it once. Specifically:

? The description of Homestead Valley states that "even though this site has low visitor use and low number of citations and incident reports related to dog activities"... "soil compaction and nutrient addition and possible erosion from dogs is assumed to be currently happening along the fire road/trails and in off trail areas throughout the site." The damage which is presumed to be occurring has not been observed, just "assumed". This unsubstantiated assumption is later utilized as justification for significant restrictions in access in the Preferred Alternative. I visit Homestead Valley almost every day. I see very little dog waste which has not been picked up or damage to soil and vegetation caused by dogs. The main environmental damage I can report on is broken glass in certain areas where people congregate and drink, nothing caused by the presence of off-leash dogs.

? Alternative A for Homestead Valley reports that the site has low visitor use. From my personal experience, this is incorrect. Dog owners living within walking distance or 5 minute driving distance (totaling approximately 30 or more residents) hike and run with their dogs all over the site, mostly off leash and have been doing so for many years. This site has been established as the Golden Gate National Recreational Area. The reason that the Homestead Valley area is not utilized as heavily as other park areas is due to its distance from the center of Mill Valley.

? The analysis wrongly concludes that commercial dog walking in Homestead Valley is uncommon I have been hiking with small groups of dogs in the Homestead Valley area for 18+ months every weekday (since I was hired to walk a dog living in the vicinity). I have met at least 8 commercial dog walkers there. I estimate there may be another 8 who come at different times than I do. Assuming each dog walker brings a group of 5 dogs, this represents 40 dogs which I have seen there at various times and another 40 which come at a different time. Each dog coming to Homestead Valley with a dog walker has a dog owner who wants their dog to be exercised and socialized with other dogs. Please note that there are approximately 65,000 dogs in Marin County. Although there are vast open space areas in the County, there are very few areas where dogs are allowed and even fewer areas where dogs are permitted off leash. Homestead Valley is currently one of those places. There are many more dogs visiting Homestead Valley than is acknowledged in the report, yet the current impact on the soil, plants and wildlife is viewed as negligible.

? The section called "Indirect Impacts on Adjacent Parks" for Homestead Valley erroneously states, that there are "26 parks within a 5-mile radius of Homestead Valley". It is clear that the analysis of the "Adjacent Dog Use Areas" was done by on-line research rather than with knowledge of this County. In addition to including small community parks full of toddlers as a

place to take dogs, it lists Park Terrace, a townhome complex where I live, as an adjacent dog use area. Does any location with a "Park" in the name qualify for inclusion? Specifically, note that:

- o Many of the "26 parks within a 5-mile radius of Homestead Valley" are small neighborhood parks adjacent to playgrounds with leash-only rules for dogs. These are not valid alternatives to the "no action" Alternative A for Homestead Valley. It is a misleading statement which minimizes the real impact of the proposed changes on the community. This analysis needs to be corrected!

- o There are only 2 roads which lead to the Homestead Valley site from the City of Mill Valley. They are narrow, steep and windy. Although the distance may be 5 miles, it takes a minimum of 15 minutes each way to reach the nearest alternate park. Time is an essential factor for most people.

- o The closest parks listed as adjacent to Homestead Valley are Old Mill Park and the Plaza. Old Mill Park is a tiny park with a playground located next to a busy street, not an ideal place to exercise dogs. The Plaza is part of the downtown square in Mill Valley, not a suitable dog exercise area either.

- o Bayfront Park is Mill Valley's off-leash dog park. My clients pay me to take their dogs on hikes and to keep them safe. Bayfront Park does not meet those requirements. This park has no shade, thus it can be dangerous for dogs when it is hot. The park has access to the Bay which can result in a dog getting stuck in deep putrid mud during low tide which is an undesirable situation.

- o The Camino Alto Open Space Preserve is the only viable alternative to Homestead Valley. It takes 20 minutes to get there-from Panoramic Highway and 20 minutes to get back. Just consider the gas, wear and tear on the car and time spent by every current dog owner and dog walker if Alternative C replaces Alternative A in the Homestead Valley site. Compare it to the "Long-term minor adverse impact" on soil if Homestead Valley remains under the current rules (Alternative A).

- o Camino Alto Open Space Preserve is very popular with private and commercial dog walkers, so Alternative C for Homestead Valley may result in higher usage of this site and its ability to remain off leash in the future.

In conclusion, there are no acceptable alternate sites for Homestead Valley residents with dogs and their commercial dog walkers. There are miles and miles of land adjacent to their homes belonging to Tamalpais State Park from where dogs are banned and where vegetation and wildlife are completely protected. Homestead Valley is the only viable area available for

daily recreation, exercise and play with dogs.

In summary, I recommend keeping the rules for Homestead Valley as they currently are and changing the GGNRA preferred choice for Homestead Valley to Alternative A, No Action. Since there are more private and commercial dog walkers using Homestead Valley than the analysis assumes and the long-term minor adverse impacts are considered negligible for Alternative A, I do not see any reason why this land cannot be kept for recreation and for unrestricted dog walking as it has been for many years. Homestead Valley is a beautiful area with spectacular views of the ocean and the bay. Dog owners and dog walkers deserve to enjoy this beauty with their dogs without having to spend their precious free time driving 40 or more minutes round trip to another area which allows off-leash dog walking. In the 18-months since I have been taking dogs to Homestead Valley, I have never observed any dogs chasing birds, snakes or other wildlife. I have seen one coyote in the area and based on its size, this animal would pose a greater danger to the dogs than vice versa. There are many mole hills in the open grassy areas in the winter but it would take much time, speed and great skill for any dog to catch one.

If you feel that more regulation than Alternative A, No Action, is needed, I would recommend limiting the number of dogs under voice control to 6 per dog walker throughout the site. There are several open grassy knolls which are perfect for retrieving the ball which are currently utilized by private and commercial dog walkers. Dogs focused on the ball do not pay attention to wild life and do not dig. It is also necessary for dog walkers to have access to the wooded area below. This section of Homestead Valley provides protection to dogs from foxtail danger in the spring/summer months and as a shelter during sudden winter storms.

To increase public awareness and cooperation I would suggest clear signage at the entrances to GGNRA land and in sensitive habitat areas. I also believe that the delivery of educational training programs designed for dog walkers, private and commercial, in partnership with the Marin Humane Society and the San Francisco SPCA, would help GGNRA to get more compliance from the dog walking public. Finally, it may help to post signs such as "Off-leash dog walking allowed" in areas where dogs under voice control are permitted. This way, people who are afraid of dogs or do not like dogs can choose to avoid these areas and spend their time in the hundreds of miles of land where dogs are not permitted. I think that this would help to reduce negative encounters between humans and dogs, complaints made to your organization and liability.

Thank you for your consideration. I would be happy to answer any questions you may have.

Sincerely,

Pavla Sim Paws in Motion Marin LLC Marin Pet Care Association

CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Representative Lynn Woolsey, 6th Congressional District of California Senator Diane Feinstein Senator Barbara Boxer Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Christine Lehnertz, National Park Service Director, Pacific West Region State Senator Mark Leno State Assembly Member Jarred Huffman

Correspondence ID: 4415 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean General Superintendent, GGNRA Building 201, Fort Mason San Francisco, CA 94123-0022

May 19,2011

Dear Superintendent Dean:

I am writing regarding the draft Dog Management Plan and Environmental Impact Statement for the GGNRA. I would like to use and enjoy the GGNRA lands. I have resided in San Francisco since 1981. I no longer go to the Crissy Fields/GGNRA area as it is overrun by dogs and dog owners. It is very clear that a person out to enjoy and observe nature is not able to relax and enjoy the park area. It is necessary constantly to get out of the way of the dogs. The owners leave the dogs off leash. The dogs run wild; the owners go to the shore for a social outing. I have gone there with friends who are dog owners. I grew up with pet dogs. I used to love dogs. The situation in our parks and in this urban area has become intolerable. I do not wish to go to a beautiful natural setting to watch dogs defecate, to see them chase the few shorebirds left, to have to avoid them as they run wild. Animal and plant life of the area are obviously endangered by the dogs' waste. The park lands are a "public convenience" for dog owners who feel they are in a natural setting, that their dogs are part of it, and that they are released from responsibility. Years ago, it was considered polite for smokers to ask if others "minded" if they smoked. It was thought rude to say, "yes;" everyone had to breathe the second hand smoke. I believe we face a similar situation with the pressure group of dog owners now. A small, well-organized pressure group is able to exert force on the general public. I am saddened to think that a decision will be made according to how many letters or comments you receive on one side versus another. A group with a

focus and organization will always make a bigger noise than the general public, which takes a while to bestir itself. It worked for smokers for decades.

I would also like to share with you the truth about the "voice control" myth. On three occasions, I have narrowly missed hitting a dog with my car near the GGNRA and the Marina. This does not include my visits to Ocean Beach or Alta Plaza Park near my apartment. Twice the owners did not even realize that the dog was running in traffic because the owner was busy chatting with other owners. They then started yelling for the dog. The dog, being a dog, kept running. The other time, the owner ran into traffic while calling for the dog. The dog kept changing directions to get away. The owner told me that she always had her dog under voice control! It was extremely upsetting to be forced to steer around the human and the dog wondering how I managed not to be killed by other cars while saving the dog's life.

I feel that it is a great loss in my life not to be able to use the parks with the frequency or freedom of the dogs. I chose to live in this place because of my desire to be close to nature and yet I'm the one being fenced in.

I strongly encourage you to adopt the plan and consider improving it by implementing the following steps:

? All "Regulated Off-leash Areas" should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. Fences provide security for all park users and create clear boundaries so that dog owners are aware of how to comply with park rules. I have ONLY. ONCE seen someone with a dog on a leash at Ocean Beach. The dogs do not know about limitations and the owners do not care. An "in your face" attitude has developed which seems to flaunt itself and dare people to say anything. Of course, no one says anything. It is very intimidating to try to speak to someone who has dogs running wild.

?The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance.

?Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it. It is a convenience for the dog-walkers--one of the most beautiful spots on earth an open porta-potty.

?At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, and those dogs are rarely on a leash. This means no trails are

available for people who prefer to enjoy the outdoors without interacting with dogs and often being forced off the path by the dog.

?Pets are important to some families and communities, but dogs are just one animal that is having a significant negative impact on thousands of other animals and plants, and on many other human visitors. Dogs, no matter how loveable, are not a natural part of the GGNRA ecosystem. The parks should be safe and accessible for all users and protect their natural and cultural resources for the future.

Finally, I must comment on what I have read to be the plan of the off-leash agitators. Their plan is to take their dogs, off leash, into the streets in a "poop in." They intend to make the streets and sidewalks so disgusting that everyone will have to let them have their way. These are the actions of self-indulgent bullies. Only two-year-olds can do that with impunity. The future of a delicate ecosystem like that of the plants and animals of the GGNRA should not be decided in order to appease self-indulgent bullies. I have heard a lot about the dogs' need for great freedom. People who live in an urban area and choose to own dogs should not then impose on everyone else's freedom to enable them to do what they like with their pets. I would like to see the shorebirds back on the beaches in the numbers they used to have. I would like to feel as though I had as much right to walk or run on the beach as my neighbors' dogs. However, I do not have that right. I cannot take visitors to GGNRA. They don't get to run free with the wind in their hair, but the dogs do.

Thank you for the opportunity to comment on the Dog Management Plan. Please continue to be a good steward for the parklands and the myriad life forms that live there.

Sincerely yours,

Leslie Friedman, Ph.D.

Correspondence ID: 4416 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: FROM: Patricia Garber, Pacifica, CA 94044

TO: Frank Dean, General Superintendent, GGNRA, Park Planning Division

DATE: March 9, Cabrillo High School Public Meeting

I am writing as a Disabled Senior Citizen who uses the public off-leash dog

walking areas to exercise my service dog. I am requesting that you continue the current policies regarding dog use at public parks ' policies that have provided many otherwise unavailable opportunities for seniors and disabled people to use the beautiful, safe facilities..

Fort Funston provides one of the only opportunity for my service dog to get unleashed exercise. Also, like many other disabled seniors, I am able to enjoy being outdoors in our lovely ocean-side parks and to take advantage of the many social interactions we have while dog walking at Fort Funston. Many of the seniors who, like me, use Fort Funston several times a week, have found exercise and friendships along with a profound enjoyment of the outdoors and scenery ' opportunities we would not have without the current policies.

The professional dog walkers have provided me with much needed assistance on many occasions. For example, when I have been unable to exercise my own dog because I was either hospitalized or unable to leave my own house, the professional dog walkers took care of my dog. On days when I have gone to walk my dog, but had difficulty physically navigating the path, the professional dog walkers were always there to give me a hand. I have observed the professional dog walkers frequently encouraging seniors and providing a hand to older disabled people when needed.

There is absolutely no way any disabled senior could manage the steps down to the beach with a leashed dog. Well, there is no way we could manage the steps without a dog, as the stairs are inaccessible to any of us who have trouble walking. You can take a cane, walker, or wheel chair along the path at Fort Funston, as many of us do, but a walker or wheel chair can not go up and down stairs. I don't know what the ADA requirements are for a public park, but Funston is currently accessible as it is now, and will be completely inaccessible if the plans change as proposed.

I read one comment opposing the current of-leash dog policy in which the writer stated that there was no need for such a policy because dog owners could simply take leashed dogs jogging with them. I think I do not need to point out the obvious ' that many of us simply cannot move as quickly as a running, happily exercising dog.

The parks provide many valuable uses for our community, including uses for the human community. I pick up after my dog, keep her out of fenced areas, and make sure she presents no harm to any wildlife (such as birds). There are many of us seniors who count on the dog parks for our personal recreation. It is safe, healthy, and beautiful. Please do not make Fort Funston inaccessible to me, to others like me, and to responsible dog owners and walkers in our community. Seniors like myself are often living on restricted incomes, and it is important for our mental and physical health to have an

opportunity to safely socialize with a like-minded community. Fort Funston has resources, such as plants and geologic resources, but it is equally important not to ignore the social resources; the human social resource should be of equal value as the geologic resources.

This, however, begs the point that we users of the park are in conflict with the environment peculiarities of the environment (bird safety, care of the dunes, growth opportunities for specialized plants). To argue that we are in conflict is a false assumption, and to conclude that off-leash dog use (and the people to whom the dogs are attached) are a danger to the flora and fauna of the park is a conclusion that is ineluctably drawn from a false premise. We all guard the plant life, we clean up after our animals, we value the wild animal life (i.e. the birds); in the 5 years that I have walked, limped, or rolled on the path at Fort Funston, I have never observed a dog harming a bird. Someone posted a picture of a dog chasing an injured bird by the beach. That is a peculiar and one-time activity ' an activity that neither I nor anyone I have ever asked has seen repeated. Please do not draw a false and harmful conclusion from a one-time, media seeking photo op provided by those who look for ways to cause the GGRNA to change its policy.

Please think of the many seniors and disabled people who happily, safely, and carefully utilize the park opportunity, and continue the current off-leash dog policies that have served many of us so well this past decade.

Correspondence ID: 4417 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Special-Status Species, pages 244-256:

1. General. Descriptions of critical habitat are missing for some special-status species that have critical habitat in the GGNRA and inconsistent in the level of detail provided regarding critical habitat among all species descriptions. For this reason, there is no clear nexus between dogs and critical habitat, and the preferred alternatives are not supported.

2. General. Some species descriptions suggest a nexus between dog activity and the species and/or their habitat (tidewater goby, California red-legged frog), but other species descriptions do not (San Francisco garter snake, Coho salmon). Where there is likely to be none, it is not stated. Where there is no nexus, the draft preferred alternative is not supported in terms of direct benefits to these species. Even where a nexus is suggested, there is no evidence of impact to these populations; therefore, the draft preferred alternative does not appear to provide a quantifiable benefit to the species

and the No Action Alternative does not significantly impair natural values

3. Page 245, Paragraph 3. States that "marine mammals are not expected to be affected by dogs", but that stranded marine mammals "may provide an opportunity for contact" with dogs. Given the relatively low number of marine mammal strandings within GGNRA over nine years (as shown in Table 7), it is not rational to assume a nexus between stranded marine mammals and dogs. There is no evidence of a harmful interaction between a stranded marine mammal and a dog. In fact, dog owners are often the first to notify authorities when marine mammals become stranded.

Chapter 4 ' Environmental Consequences

General:

1. On page 30, in Chapter 1, under "Safety of Off-Leash Dogs", studies are cited where data indicated off-leash dogs do not travel far from their owners or trail, and if they did it was a short time and the dogs were rarely seen chasing other dogs, disturbing wildlife and vegetation, or entering bodies of water. In addition, a survey was cited where both dog owners and non-dog owners believed that humans are more disruptive than dogs. This contradicts many of the impact conclusions made for vegetation, wildlife, and special-status species. The conclusions drawn in the impact analysis are not adequately supported by documented evidence of damage to resources (that can be attributed to dogs) in the GGNRA.

2. General habitat types and which sites they occur in are described in the affected environment section; however, the document lacks a map of the specific location of each habitat types within each site relative to existing and proposed dog use areas and trails. The impact assessments in Chapter 4 are divided up by habitat type, yet all of the actual impact assessments identify impacts on "vegetation" with no indication of whether or not a particular habitat type occurs within the area of discussion (LODs and ROLAs). Without documentation of the specific location of vegetation types relative to dog use areas, conclusions of impacts on these resources are not adequately supported. For example in the wetlands section the Draft Plan/DEIS describes impacts to vegetation along trails within six feet on either side; however, there is no evidence to support the claim that wetlands actually exist adjacent to the trails. In those instances, the wetlands impact analysis is inaccurate.

3. The analysis of the impacts to vegetation lacks empirical evidence of the current impacts caused by dogs. Information is given as to usage and the number of violations but does not site specifics about damage caused by dogs as a result of these violations. Without evidence of the occurrence of impacts caused dogs, impact conclusions made are not adequately

supported.

4. For a number of the analyses of Alternatives B-E, the Draft Plan/DEIS states that the area of impact is previously undisturbed. These claims are false as dogs are currently allowed in those areas and dog use would continue under Alternative A, the No Action Alternative.

5. The impacts addressed in Alternatives B-E are assessed based on the assumption of compliance. Alternative A is not assessed this way. For example, if dogs are required to be on leash under Alternative A, the impacts are assessed based on impacts caused by dogs which are off-leash and noncompliant. Alternatives B-E then assesses impacts based on the assumption of compliance and therefore the impacts are reduced even though the leash-law regulation is the same under all alternatives. Assessing impacts based on identical regulations with different assumptions is inaccurate. There is no information given as to why compliance under Alternatives B-E cannot be done under Alternative A. The current GGNRA management plan identifies public education of GGNRA resources as important and could be accomplished under Alternative A.

Introduction (pages 289-290):

1. The compliance-based management strategy assumes that noncompliance is causing negative impacts on GGNRA resources. As commented in Chapter 3, this assumption is not supported by adequate data from GGNRA sites. This strategy (page 290, paragraph 2) "is designed to return impacts to a level that assumes compliance" and "provide beneficial impacts where dog walking is reduced or eliminated". There has been no baseline given to quantify a "level that assumes compliance"; therefore, any potential impacts from dogs cannot be measured or used as a basis for selecting alternatives.

2. The Draft Plan/DEIS states that dogs and humans have been active in these lands for at least the past 40 years (pre-1970s), and that visitation has been consistent over the past 20 years, and will likely remain consistent in the next 20 years. Page 290, paragraph 5, also notes that visitation is not expected to increase over the next 20 years, and that this is "similar how it has been operating over the previous 20 years. Therefore increased visitation should not result in cumulative impacts to GGNRA resources." The basis for assuming that resources have been negatively impacted over the past 20 years and will therefore benefit over the next 20 years with substantially less access for people with dogs has not been established.

Vegetation:

1. Page 545, Paragraph 2 ' the EIS includes no discussion of what "additional actions" would potentially have adverse impacts on vegetation

and what types of impacts. Text also states that "mitigation for these projects would reduce the potential for impacts." However, there is no discussion as to what kind of mitigation would occur and how it would reduce impacts. Therefore, no measure of a quantifiable reduction of impacts can be determined by mitigation efforts. For projects outside of GGNRA, it is assumed that mitigation would be applied. There is no evidence to support this assumption. More specific information is needed to adequately assess and comment on impacts. This comment applies to this same text where it is repeated in the cumulative impact analysis throughout the section and the wildlife and special-status species sections.

2. Page 546, Alternatives B & C ' dog walking restrictions are the same as in Alternative A. There are no data that supports a change in the level of impact as a result of these alternatives.

3. Page 584, Alternative B ' states that the rocky intertidal plant communities have not been previously disturbed. This is inconsistent with Alternative, A which states that dogs could access the rocky intertidal areas. The inconsistency of the baseline level of disturbance prevents an accurate conclusion as to the potential for impacts caused by dogs.

4. Page 597, Cumulative Impacts, paragraph 3 ' this paragraph does not make sense. The text states that adverse impacts from dogs combined with beneficial actions balance out resulting in negligible impacts. Cumulative impacts should be revised to indicate they would not be long term, major and adverse.

5. Page 605, Alternative A, paragraph 1, states that dogs can affect the rocky intertidal vegetation. No evidence has been provided to support that dogs are presently having adverse impacts on this vegetation.

6. Pages 607-08 and 666-667, Alternatives B & C ' these alternatives mention the Polywog Path and ponds. There is no discussion of the significance of this path or the ponds or the potential impacts of these areas under Alternative A so the impact conclusions relative to the baseline are not clearly presented.

7. Page 619, Alternative A, states that physical damage and nutrient addition from dogs is assumed to be currently happening; however, there are no data presented that supports this claim. Other impacts described seem overstated considering low visitor use. Because current conditions have not been adequately established, there are no quantifiable changes expected from the Preferred Alternative over the No Action Alternative.

8. Page 632, Paragraph 2, states that dogs would impact coastal scrub, chaparral and grassland vegetation. There is no evidence provided to support

the occurrence of this under existing conditions and therefore, no quantifiable benefit expected from the preferred alternative over the No Action Alternative.

9. Page 634, Alternative C, paragraph 1 ' There is no evidence that dogs confined to a ROLA increase impacts to adjacent habitat. Without establishing the current level of impacts from dogs in ROLAs, no quantifiable change can be expected from the preferred alternative over the No Action Alternative.

10. Page 645, Alternative A, paragraph 1 ' "...viable plant communities exist." Data are lacking as to the type of plant communities that exist in the areas adjacent to the trails and fire roads in order to clearly describe suggested impacts.

11. Page 658, Alternative A, paragraph 1, states that several threatened and endangered plants grow in serpentine soils. There are no data to support the presence of these species at this site. This information is needed to clearly describe suggested impacts.

12. Page 698, Wetlands and Aquatic Habitats, General Comment ' many of the impacts to wetlands are based on six-foot corridors adjacent to trails. There is no mention of where exactly wetlands are located within each site and whether or not they occur within six feet of the trails. Each impact just says "vegetation adjacent to trails" which is not specific to wetlands or aquatic communities in which this section is solely addressing. Without evidence of the exact locations of wetlands and aquatic habitats within each site, no assessments can be made as to the level of impacts of the preferred alternative over the No Action Alternative.

13. Page 740, Native Hardwood Forests, General Comment ' impacts to this habitat by dogs would vary by maturity of the trees. All impacts seem to just state "vegetation" which does not clearly describe suggested impacts.

14. Page 740, Alternative A ' Data are needed as to the maturity of the trees in order to assess the level of impacts caused by dogs under all alternatives. Dogs would not be able to trample mature trees.

15. Pages 769-774, Alternatives B-E, states that riparian vegetation along trails would be impacted. There is no evidence to indicate that riparian vegetation occurs along trails and therefore, no quantifiable changes in impacts can be expected from the preferred alternative over the No Action Alternative.

Wildlife (pages 791-1108):

1. General. It is assumed throughout the analysis that marine mammals and shorebirds would suffer negative impacts from off-leash dogs and that birds would suffer negative impacts from on-leash dogs. There is no evidence to support this assumption. As noted in comments above, a disturbance is not the same as an impact. NEPA defines "effect" or "impact" as requiring a likely causal consequence (40 CFR ' 1508.8). Under NPS and GGNRA policy, as explained in the Draft Plan! DEIS (page 35), the impact would likely need to impair the natural values afforded protection under applicable plans or policies. Under NEPA, the significance of that impact needs to take into account context and intensity (50 CFR ' 1508.27). Because current conditions have not been adequately established, there are no quantifiable changes expected from the preferred alternative over the No Action Alternative.

2. General. For preferred alternatives in coastal areas that allow dogs on leashes, it is stated that on-leash dogs could still disturb shorebirds by barking or presence; however, the impacts are determined to be negligible. In other sections, it is suggested that barking and presence of off-leash dogs would result in minor to adverse moderate impacts. Again, because the potential level of disturbance has not been clearly established, there is no basis for assuming the presence of dogs will have significant adverse consequences relative to other factors (such as people or predators) or to quantify changes expected from the preferred alternative over the No Action Alternative.

3. General. In some areas, the difference between the No Action Alternative and preferred alternative is off-leash and on-leash use. Long-term minor to moderate impacts are expected for off-leash dogs, and long-term minor impacts are expected from on-leash dogs, although the difference in disturbance to wildlife between on- and off-leash dogs under voice control has not been established. Physical damage to nests and habitat and wildlife chasing is cited as a moderate adverse impact; however, the level of current damage is not known. The data presented in Appendix G further indicate limited interactions over time. This is noted for:

- o Homestead Valley, Alta Trail, Oakwood Valley, Marin Headlands, Fort Baker, Baker Beach and Bluffs, Lands End, Mori Point, Milagra Ridge, Pedro Point coastal scrub, chaparral, and grassland habitats.
- o Fort Baker forest habitat
- o Marin Headlands outside of LOD area riparian habitat
- o Fort Miley, other coniferous community

4. Throughout the analysis, Alternative A (No Action) assumes noncompliance, while the other alternatives assume full compliance with dog restrictions (which leads to a "long-term minor adverse impacts" conclusion for Alternative A and a "negligible" conclusion for the preferred alternative). In some cases, the only difference between Alternative A and

the preferred alternative is the assumption of compliance. When proposed dog management is the same for a given area under two or more alternatives, the impacts should also be the same. Many of the differences in impacts are based on assumed compliance under the action alternatives; however, as noted above, an unbiased comparison would assume compliance for all alternatives. This is noted for:

o Stinson Beach (coastal) o Crissy Field (outside of ROLA - coastal and wetland) o Baker Beach and Bluffs (outside of ROLA - coastal) o Mori Point (coastal and wetland) o Oakwood Valley (outside of ROLA - forest) o Muir Beach (riparian)

5. Page 794, Duration of Impact (same comment for page 1112 of Special-Status Species) "The assumption that "all natural resources" will experience short-term impacts during the education and enforcement period, regardless of the alternative chosen, is not supported. It may be accurate to state that the existing conditions will continue during the education and enforcement period of an adaptive management plan. The section goes on to note it is "expected that compliance and associated adverse impacts would improve gradually and impacts on wildlife would then become long-term." This expectation is not supported by the information provided in Chapter 3. There are little data or descriptions of current adverse impacts; therefore, there is no baseline provided that would indicate improvement under the preferred alternative. The assumption that impacts will become long-term (described as persisting for the next 20 years) is also not supported, given the lack of adequate, quantifiable baseline conditions.

6. Pages 796-797, Impacts Common to All Alternatives ' prey species are adapted to fleeing from predators, whether dogs or any other. Although the Draft Plan/DEIS labels this as harassment (based on a definition in the Endangered Species Act, which does not appear to be the appropriate standard), it would nevertheless not be expected to impact the species. Even if a species avoids near-trail areas because it has adapted to the presence of dogs (a potential predator), it does not mean that species is experiencing an adverse impact. The Draft Plan/DEIS states that "actual direct injury or mortality to wildlife by dogs (on or off leash) is rare," so any potential long-term, adverse impact from this "harassment" is not expected. The studies currently cited are not supportive of the preferred alternative ' it is not unusual for a rodent (marmot) or bird to react to a predator.

7. Page 797, Paragraph 3 ' a study is cited concluding that "off-leash dogs have no impact on the diversity or abundance of birds and small mammals because these species are fairly tolerant of... human activity," which indicates the No Action Alternative would not significantly impair natural values. o The results of the study by Shulzitski and Russell (2004), is cited in support of dog restrictions; however, this study appears to be biased. The

restricted area was restored with native vegetation, while the unrestricted area was not restored. Wildlife was more abundant in the restored area, but this may have been due to the re-planted native vegetation ' there is no evidence to suggest that restricting dogs caused an increase in abundance. The observation of a dog barking at a fox (whose behavior remained unchanged) at Fort Funston supports the argument that wildlife in GGNRA are acclimated to dog presence and that the No Action Alternative would not significantly impair natural values.

8. Page 800, Paragraph 2 ' "When compliance is assumed, management alternatives that would prohibit dogs from accessing wildlife habitats would eliminate disturbance to wildlife from dogs..." The Draft Plan/DEIS states that GGNRA visitors sometimes access restricted areas, but these occasions are not quantified, nor is are the baseline conditions in these areas provided. There is no evidence to suggest wildlife would experience benefits from prohibition associated with the selected alternative. Although compliance should be assumed for all alternatives, there will likely be some non-compliance by a various visitors, with or without dogs. Because perfect compliance cannot be assumed, and because the current conditions are not known, it cannot be concluded that the alternatives would provide a benefit to wildlife over the No Action Alternative.

o "Prohibiting dogs from areas also prevents habitat degradation and loss of species that are sensitive to the presence of dogs" this has not been supported in the text. Loss of species from dogs in the GGNRA has not been presented. While the Draft Plan/DEIS presents a few studies that suggest certain species are "sensitive" to dog presence, it presents other studies that found little or no sensitivity to dog presence; therefore, the preferred alternative is not supported.

9. Page 802, Compliance-Based Management Strategy

o Because some noncompliance is already occurring, it is unclear why supposed impacts would increase and potentially become "major adverse" if noncompliance continues, especially given the relatively stable visitor level in recent and projected years. Again, the baseline conditions, including 40 years of use by people with their dogs, have not been established and any impacts stemming from noncompliance have not been outlined; therefore, there is not adequate support to conclude major adverse impacts.

o There is no description of how or if newly restricted areas would be monitored for a change in natural resources. Because the baseline conditions have not been established, changes in management based on noncompliance should be approached with care.

10. Page 809, Alternative A ' it is unclear how shorebirds, gulls, terns, and

marine mammals would experience moderate adverse impacts from dogs, or how "occasional to frequent disturbances would occur", given the documented low shorebird abundance, and no historic incidence of dogs affecting marine mammals at Muir Beach. See prior comment on marine mammals (page 245).

11. Page 812, Alternative D ' it is unclear how species will benefit from total exclusion, because it hasn't been established that species are currently being negatively impacted on Muir Beach. There would likely be "no change".

12. Pages 825-826, Alternative A ' the rationale for the "long-term minor adverse impacts" conclusion does not mention mission blue butterfly habitat; however, for the preferred alternative, beneficial impacts are assumed because dogs would no longer be allowed on Battery Yates Trail (near mission blue butterfly habitat).

13. Pages 856-857, Alternative A ' the snowy plover resting areas have been monitored since 1996 with no evidence to suggest that preferred habitat use has changed (the snowy plover section of Chapter 3 states that birds continue to use the same two resting areas), or that roosting and foraging behavior is being adversely affected by dogs, yet this is given as rationale for long-term moderate to major adverse impacts.

14. Page 971, Alternative A, states that on-leash dog walking is currently allowed at Sweeney Ridge. There is no baseline condition given to quantify any supposed impacts currently occurring at Sweeney Ridge that would lead to a "no impact, beneficial change" under the preferred alternative (prohibiting dogs from Sweeney Ridge).

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

Special-Status Species (pages 1109-1291):

1. General. Suitable habitat for the plant species discussed in this section occurs at other sites which were not analyzed in this section. The Draft Plan/DEIS lacks a discussion as to specifically why certain sites were chosen over others for analysis.

2. General. The microhabitats of the special-status plant species are very specific. The Draft Plan/DEIS lacks information delineating the location of the potential habitat within each site. This is necessary to establish a baseline for the current level of impacts by dogs in these areas and accurately assess the potential impacts based on the alternatives. This information is essential and capable of being obtained.

3. Page 1112, Assessment Methodology ' analysis of vegetation changes does not account for aquatic critical habitat loss. Was loss of critical habitat for aquatic species measured?

4. Pages 1117-1123, San Bruno elfin butterfly ' here, Alternative A and the preferred alternative do not differ (on-leash, negligible impact). The impact of Alternative A appears to assume compliance with leash law, and it is stated that "historical use of this area shows no indication that the host plant or butterfly is being affected by dogs;" therefore, the No Action Alternative would not significantly impair natural values.

5. Page 1124, paragraph 2, mission blue butterfly, cites localized, perceptible damage to habitat on trail beds, roads, and adjacent areas "as a result of damage to the vegetation from dogs", but there is no description of how this was assessed. These areas are used by hikers, runners, naturalists, bikers ' how is damage from dogs isolated from these other potential sources? The preferred alternative expects negligible/beneficial impacts by eliminating use of social trails by dogs, but it does not appear that continued human use was considered in this conclusion (same comment applies to conclusions for other analyzed mission blue butterfly areas: Oakwood Valley, Marin Headlands). As stated previously, baseline conditions on these trails have not been adequately established; therefore the negligible/beneficial impacts cited under the preferred alternative are not supported.

6. Pages 1147-1158, mission blue butterfly, Fort Baker and Milagra Ridge ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) and the preferred alternative assumes compliance (negligible to minor, adverse impacts, with habitat restoration programs). This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

7. Pages 1165-1172, tidewater goby ' Alternative A states that Rodeo Lake is currently closed to dogs, and the lagoon is closed to dogs and humans. The proposed fence "will deter but not physically exclude dogs". It is explained that dogs in voice-controlled areas are not very well controlled and have been observed in the lagoon. Impacts range from negligible to long-term, moderate adverse. Under the preferred alternative, Rodeo Lagoon

would remain closed and dogs are still able to access the area; compliance with leash restrictions and ROLAs is assumed. The impacts under the preferred alternative are expected to be negligible ' again, this conclusion seems merely based on an assumption of compliance, when the level of use and potential for noncompliance is the same as under the No Action Alternative. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

8. Pages 1172-1191, Coho salmon and steelhead trout ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible impacts). This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

9. Pages 1191-1219, California red-legged frog, Muir Beach, Marin Headlands, Mori Point, Cattle Hill, Pedro Point ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

10. Pages 1219-1240, San Francisco garter snake, Mori Point, Milagra Ridge, Cattle Hill, Pedro Point' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). The text states (page 1230) that there is no documentation that the current level of compliance with on- leash laws (No Action Alternative) is impacting this species. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

11. Page 1240, western snowy plover ' states that walkers who traverse the beach area currently impact plovers. As described in Comment 6, it is difficult to distinguish between dog and human activity. The basis of the impacts conclusion is based on the assumption that dogs currently impact snowy plovers at Crissy Field, but there is no evidence to support that removing dogs from the area will result in a change in the plover population. The preferred alternative assumes compliance and negligible impacts by closing the site to dogs. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance. There are data provided of observations of dogs chasing birds, but no correlation between these events and impacts to the species (see prior comments on Chapter 3). These observations have been made since 1996, but the plovers' use of preferred habitat does not appear to be limited. There is no obvious nexus between dog chasing and loss of species or habitat, therefore the "moderate adverse impacts" under the No Action Alternative

are not substantiated.

12. Page 1264, bank swallow ' as with the Western snowy plover, current impacts are considered minor to moderate based on occasional to frequent perceptible disturbances to the species from dogs; however, the description of Alternative A mentions only that dogs have been seen in the bluff area. There is no apparent nexus between dog activity and actual short-term or long-term impact to bank swallows.

13. Page 1277 ' This is contradictory ' there is no evidence that the spotted owl exists at the site; however, impacts are deemed adverse under the No Action Alternative. If it is because potential habitat exists, then it seems (page 1282) that no change would occur under the preferred alternative, in which dogs remain leashed. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

14. Page 1291 ' according to the table in Appendix H, suitable habitat for the listed plant species exists at many sites. There is no discussion of what rationale was used to determine which sites were considered in this analysis.

15. Page 1292, 2nd paragraph ' there is no evidence of dogs currently accessing the dune scrub vegetation presented to support the impact conclusion. Without adequately establishing a baseline for current impacts, no quantifiable changes in impacts can be expected from the preferred alternative over the No Action Alternative.

16. Page 1296, Alternative D, states that impacts to lessingia adjacent to the trails in the LOD area would occur in areas that "have not been previously disturbed." However these areas are currently open to dogs, therefore any impacts from dog use would already be occurring. Therefore, the level of impact is misrepresented. Similar statements occur throughout this section including pages 1305, 1316, and 1323.

17. Page 1306, Alternative C, conclusion table, states "if potential San Francisco lessingia habitat is located in the LOD area." Locations of the potential habitat should already be known, and impacts should be based on whether or not potential habitat is actually present. Without data supporting the location of lessingia habitat, no conclusions can be made regarding the potential impacts.

18. Page 1311, Paragraph 1, states that the greatest benefit to the species would occur if the Daly City genotype is reintroduced at Fort Funston. There is no evidence given that the implementation of this is expected. This would be relevant to the proposed management of the area and concern for

potential impacts.

19. Page 1312, Alternative A, states that the widening of the Coastal Trail would increase impacts to Presidio manzanita. This is inconsistent with the cumulative impacts on page 1313, which states that the trail realignment would avoid the manzanita and provide long-term protection. 20. Page 1325, Paragraphs 1 and 2 ' these two paragraphs are inconsistent with each other. Paragraph 1 state impacts to Marin dwarf-flax adjacent to the trails would be long term, minor and adverse. In paragraph 2, it states that the plant exists in soil outcrops that are inaccessible and that physically restraining dogs would protect the habitat and restored population.

21. Page 1329-1332, Alternatives B-E ' dogs are prohibited from Crissy Marsh under the No Action Alternative as well. dogs are prohibited from the marsh under all alternatives, impacts should be the same. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

22. Page 1333, Hiclan's Pontentilla ' No justification is given as to why only Mori Point and Pedro Point were the only two sites analyzed if no mapped occurrences have been recorded there and potential habitat exists at other sites as well (per the affected environment and Appendix H).

23. Page 1336-37, Alternative C, conclusion table ' the rationale for impacts in the LOD area should be the same as the other Alternative B impacts, based on the text discussion.

24. Page 1342, Alternative C, conclusion table ' the rationale for impacts in the LOD area should be the same as the other Alternative B impacts, based

Correspondence ID: 4418 **Project:** 11759 **Document:** 38106
Received: May,30,2011 00:00:00
Correspondence Type: Letter
Correspondence: Golden Gate National Recreation Area

Project:Dog Management Draft Plan/DEIS (ID: 11759)

Document: GGNRA Draft Dog Management Plan / Environmental Impact Statement (ID: 38106)

From: San Francisco, CA. 94115 Lisa Carey San Francisco, CA 94115

Mr. Frank Dean Fort Mason, Bldg. 201 San Francisco, CA 94123

Re: Dog Management Plan

Dear Mr. Dean,

I am writing to strongly protest the efforts of the GGNRA in restricting dogs from running off a leash. I 1) oppose the Preferred Alternative as it now stands or any of the plans contained in "Draft Environmental Impact Statement for Dog Management at GGNRA" and 2) strongly oppose including a Compliance-based management strategy (the "poison pill").

I advocate, instead, a continuing dialogue between the GGNRA and SF dog owners. That the number of dogs owned in the city is increasing is indicative that dogs are a vibrant and important part of the lives of residents of San Francisco. The elderly love their dogs as companions, families include their dogs as part of raising their children to know and love dogs; singles love their dogs as companions. Instead of limiting off leash, we need more constructive dialogue around good dog care and management, exercise and humane treatment. A healthy well- exercised dog, like a person, is healthier and happier animal. Limiting off-leash options for dogs limits options owners have for ensuring our dogs have healthy lives. It is ironic and unfortunate that the GGNRA believes that it is in everyone's interest to limit off leash in the GGNRA. Your EIS findings are misguided and will, if implemented, create more congestion for dog owners, less opportunity to exercise our dogs, and finally further undermine the special relationship between owners and their dogs.

The basis for my strong opposition to the proposed "off leash" controls are as follows: 1. Congress created the GGNRA in 1972 to: "to provide public access along the waterfront and to expand the maximum extent possible the outdoor recreation opportunities available to the region." The proposed dog ban appears to be in direct opposition to that mandate. 2. Throughout the plan, NPS calls for balanced use of GGNRA lands by all parties. Your Preferred Alternative and all other Alternatives do not strike a balance. In fact, the National Park Service already prohibits off leash in all National Parks. Many of the GGNRA areas already limit off-leash access to dogs. In response to concerns about the Snowy Plover, over 1/3 of Crissy Field Beach is closed to "off-leash" access. Your "Preferred Alternative" would take away another 1/3 of the beach area (East Beach) and limit used of the Green space. In addition, many of the other areas, such as Fort Funston, are already much limited in off-leash. Finally, it's hard to accept the balance argument when all National Park Service areas are closed to off-leash, the Presidio Trust is trying to enforce greater off-leash, and the City of San Francisco limits off-leash. Slowly but surely, dog owners are losing access to places to take our dogs off leash in San Francisco, the Bay area and across all National Park land. 3. Your EIS indicates that dogs at places such as Crissy Field effectively overrun beach goers and tourists. I take my 80-

pound Labrador to Crissy 5-6 times a week (or to Baker Beach). During the week at Crissy, the majority of users on East Beach or the open Green space are dogs and their owners. When it is foggy, there isn't anyone on the beach or green space except for dogs and their owners/ walkers. Even on weekends (such as yesterday- Memorial Day weekend- there were few tourists or beach goers before 10:30am/ 11:00am. On most weekends, the crowds are on the beach (on a nice day) between 11am and 4/5pm. Dogs are not overrunning these groups; they are enjoying relatively open space. 4. Dogs are important companions to many people in our city and dog walkers are custodians of the land. They walk on it, love it and look after it, picking up trash, reporting dead animals, and any other problems. Dog owners are law-abiding citizens who by their presence on the GGNRA lands discourage crime of all kinds. It is in the interest of anyone who cares about open space to work together - with dog owners, including, believe it or not, bird lovers in protecting our waterfronts. The beaches are largely deserted except for people and their dogs with the exception of weekends and then only when the weather is fine... rare in San Francisco! 5. The complaints from the Audubon Society and the Park Service that dogs are somehow a threat to the coastal areas is ridiculous and vastly overblown. Any instances of dogs harming birds are very rare and unusual; proper dog training can address this. As for disturbing the nesting sights this can be addressed through education and signage. 6. Plants should not take precedence over people in urban areas but live alongside people. We must not forget that we are a city and the same standards of preservation do not apply, as they would in a national park in the middle of nowhere...there must be balance between people and plants. 7. The GGNRA does not appear to be interested in making dog owners responsible for the behavior of their dogs and insisting that of leash dogs are well trained. Would you really rather take the easy path and just legislate against off leash dogs? 8. The GGNRA/ NPS proposal for a "poison-pill" compliance strategy demonstrates little respect for dog owners (who are taxpayers and citizens). Under the "proposed alternative" if no one was on East Beach, and I took my dog out there for a quick run at 7am in the morning, I would be in violation of the GGNRA proposed alternative and contributing to "non compliance". This is absurd and "in my view" and represents overreaching enforcement by the federal government. Big stick enforcement is not appropriate and is wrong.

Finally, I would rather see signs asking dog owners to always be respectful of the other users of the beach and not allow their dogs into the areas where the shore birds nest, an education campaign perhaps. Even a license system for owners to have their dogs off leash where they have to prove that the dog is properly trained (rather like a drivers license) might be a solution.

Another idea is to limit the amount of dogs' one person can take to the GGNRA. I can see the problems when you have 10 dogs per person! These people are running a business; perhaps they should be treated as such. The

rest of us are people who love the outdoors and love to walk in nature and we choose to do it with our faithful companions. We are the GGNRA's greatest allies.

Surely personal responsibility with freedom is better for our society than yet more restrictions and legislation!

This proposed plan is discriminating against one type of person, namely a dog owner; even the coyote has more rights in the Presidio.

Dogs provide so much love and support to humans in so many ways; they need places to run free. A tired dog is a well-behaved dog!

Thank you for your kind consideration,

Yours truly,

Lisa Carey

Correspondence ID: 4419 **Project:** 11759 **Document:** 38106
Received: May,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 17, 2011

Frank Dean, General Superintendent GG National Recreation Area Building
201, Fort Mason San Francisco, CA 94123-0022 Dear Mr. Dean:

I am writing to oppose the GGNRA draft dog management plan and "all action alternatives" that further reduce or ban dogs in open spaces. Please keep our open spaces dog-friendly and plentiful.

The GGNRA draft management plan does not provide sufficient evidence to justify such drastic changes to 40 years of healthy dog recreation and does not address the health or well-being of people, dogs or the community. The GGNRA must accommodate both recreation and conservation. Regulations for Yosemite and Yellowstone are not appropriate for an URBAN RECREATION AREA and the courts have upheld the existing 1979 pet policy. One in three households in America have dogs and this plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and more.

Off-leash recreation optimizes exercise and socialization for dogs and improves human health and well-being. Dogs encourage people to walk more which reduces obesity and depression and encourages the flourishing

GGNRA social communities. Injuries or problems are rare particularly in comparison to these benefits.

The Park Service should revise the dog management plan to:

? Recognize dog recreation as a safe and healthy recreational activity and as important to the health and well-being of people, dogs, and communities, especially those in densely populated urban areas.

? Justify any changes with objective, reasonable scientific studies and findings and remove the many exaggerations, speculations, and misleading statements. Don't treat dog recreation as a hazard and nuisance despite facts to the contrary; it's compatible with other urban recreation. ? Keep the current GGNRA dog policy (aka the 1979 Pet Policy) plus add balanced voice-control areas in San Mateo County and new land.

? Start over and study actual dog specific impacts at each site in the GGNRA, and then consider whether there are simpler mitigations (e.g., awareness programs, signage, cliff edge deterrents, barriers, etc.).

? Remove rules that ban dog recreation for all people with dogs based only on violations by others; non-compliance does not equal negative impacts.

I am a mother and legal assistant; I live in Pacifica, California, and want more parks in America to accommodate well-behaved dogs and their families, particularly parks with long hiking trails. We travel with our dog and family and cannot go places that do not allow dogs so we certainly do not go to the typical National Parks. It is horrible that so few parks allow dogs on hiking trails when dogs make so many of us happier and get us out to exercise on a daily basis.

Almost all people with dogs control and pick-up after their dogs. Walking with our dogs is good exercise and makes us and our dogs healthier and safer. On the whole, I find family dogs to be far better behaved than people and have seen no serious safety issue with a well exercised, socialized, and trained dog. This plan only makes it more difficult for people to responsibly care for their dogs and themselves.

I am particularly concerned about my hometown of Pacifica. The main reason I love living here in Pacifica is because it is very dog friendly. Our everyday and favorite place to walk is Mori Point and Sharp Park beach. We have met a lot of other Pacifica residents and their dogs while on our daily walks, which makes us a closer community of people. This is also our dog's favorite place to walk and play and socialize with other people and their dogs.

Dogs actually improve a community and bring people closer. I would not know any of the nice people I now know if I did not have my dog.

Please keep San Mateo County, and particularly Pacifica and other coastal communities, dog friendly. Thank you for your consideration.

Very Truly Yours,

Ina M. Strehle-Talamantez Senator Diane Feinstein Senator Barbara Boxer
Congresswoman Nancy Pelosi Congresswoman Jackie Speier Secretary Ken
Salazar National Park Service Jon Jarvis, Director National Park Service
Christine Lehnertz, Pacific West Regional Director Senator Leland Yee
Senator Mark Leno Assemblymember Fiona Ma Assemblymember Tom
Ammiano Mayor Ed Lee Board of Supervisors Eric Mar Board of
Supervisors Mark Farrell Board of Supervisors David Chiu Board of
Supervisors Carmen Chiu Board of Supervisors Ross Mirkarimi Board of
Supervisors Jane Kim Board of Supervisors Sean Elsbernd Board of
Supervisors Scott Wiener Board of Supervisors David Campos Board of
Supervisors Malia Cohen Board of Supervisors John Avalos Supervisor
Carole Groom Supervisor Don Horsley Supervisor Rose Jacobs Gibson
Supervisor Adrienne Tissier

Correspondence ID: 4420 **Project:** 11759 **Document:** 38106
Received: May,19,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 18, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

The "Compliance-Based Management Strategy" outlined in the DEIS is designed to eliminate dog walking on GGNRA land. It is not a "management" strategy at all; it is an "eliminate dog walking" strategy.

The "secondary management response" eliminates dog walking opportunities in a one-way "ratchet" manner. Management response moves in only one direction: Dog walking rights are reduced or eliminated; there is no way for dog walking rights to expand or to be restored under the DEIS. The medium term goal, and predictable outcome, is to have less dog walking in the GGNRA. The long-term goal is to have no dog walking in

the GGNRA.

There is no other recreational activity in the GGNRA subject to such a punitive "management strategy," in which GGNRA has a built-in mechanism to eliminate the recreation for all visitors if some visitors don't comply with regulations. Once again, GGNRA/DEIS demonstrates that off leash dog walking is still not accepted as a legitimate recreational activity within the GGNRA.

There are reasonable management strategies available to GGNRA to produce high levels of visitor compliance. The most effective: Do not eliminate most of the off leash area in the GGNRA. If reasonable areas exist for visitors to take real walks with their dogs, those visitors are not inclined to walk into unapproved areas. But in fact, all alternatives except Alternative A drastically reduce off leash area in the GGNRA, leaving small ROLAS where a walk is not possible. The small ROLAS also guarantee extreme crowding of visitors and their dogs, changing an important recreational activity into an unpleasant ordeal.

The drastic curtailment of off leash recreation in the proposed Preferred Alternative(s), combined with the punitive, one-way-only "Compliance-Based Management Strategy" is a cynical formula designed by GGNRA to ultimately eliminate off leash recreation.

Another important management strategy would be for GGNRA to examine closely what they perceive to be non-compliance. Why are people in a particular location not complying with a particular regulation? For example: Is signage incorrect? (It is often incorrect in GGNRA.) Is enforcement inadequate? Are the areas and trails not laid out well, contrary to natural foot traffic flow? Would it be more reasonable to connect two off leash areas with an off leash corridor? ... etc.

GGNRA-controlled conditions on the ground influence compliance with regulations. I visited Fort Funston May 14, 2011. There has been no apparent maintenance there for the last ten years: Fences are down or covered by sand; cables are missing; signs are missing, out-of-date, or illegible from weathering, etc. The breeding bank swallows are there, but the presence of the swallows is not indicated in any way; the bank swallow protection area shown on DEIS Maps 16 and 16A-E is not marked. A new visitor could easily be out of compliance and not know it, because GGNRA has not taken normal managerial actions.

GGNRA simply abdicates managerial responsibility when its only solution to perceived non-compliance is to further restrict recreational activity. GGNRA actually proposes to forbid itself to take any reasonable management action that would increase off leash area by even a small

amount.

The "Compliance-Based Management Strategy" incentivizes the GGNRA to do no enforcement or notification of restrictions. Less enforcement will mean less compliance, putting GGNRA in a position to impose further restrictions. Likewise, the less visitors know about restrictions, the less likely they are to comply, resulting in GGNRA's desired outcome of further restrictions.

GGNRA must remove the "Compliance-Based Management Strategy" with its draconian "secondary management response" from all alternatives. Adopt a reasonable and flexible management strategy that confronts problems as they arise and manages them.

Sincerely,

Keith McAllister Oakland, CA 94611

Cc:Senator Dianne Feinstein Representative Nancy Pelosi Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Fort Funston Dog Walkers (FFDW) San Francisco Dog Owners Group (SFDOG)

Correspondence ID: 4421 **Project:** 11759 **Document:** 38106
Received: May,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 16, 2011

Superintendent Frank Dean Golden Gate National Recreation Area Building
201 Fort Mason San Francisco, CA 94123

RE: GGNRA Draft Dog Management Plan EIS- I support Alternative D, throughout GGNRA parklands

Dear Superintendent Dean:

Thank you for the opportunity to comment on the above named Plan EIS. I am very appreciative of the time and care GGNRA took to make sure all stakeholders were part of the decision making process and that the Park provided the community with multiple options for dogs to visit the Park.

I helped plant Crissy Field and was both a Presidio Park Steward and a volunteer at the Presidio Native Plant Nursery for about a decade starting in 1998, and, as such, am very familiar with the rich cultural and astounding natural resources of the park. In recent years it has been very exciting to

learn that species thought gone forever from the Presidio are being rediscovered. And in the case of the Western Bluebird, habitat restoration has enabled this stunning creature to return to the Presidio. Habitat restoration all over GGNRA is an enormous enterprise, involving hundreds of thousands of hours by volunteers; an enterprise underlining the great regard the community has for the continuation and protection of the wildlife and the multitude of plant life, and all the biota, that this park shelters.

The Park is mandated to protect its wildlife and their habitat from detriment, and to preserve their assets, unimpeded, for the enjoyment of the generations to come. As a long term volunteer who has personally witnessed more bad behavior on the part of dog owners than I could have imagined, I have come to the conclusion that many people who own dogs don't all care enough to train or restrain dogs from doing damage to our National Park.

Therefore, I support implementation of Alternative D; the most protective alternative of the park.

In addition to my support of Alternative D, I would like to urge added ways protect the park and ask that the following factors also be placed into the Dog Management Plan: ? Wherever dogs are allowed on leash on pedestrian walkways, the dog must be on a leash short enough to restrain the animal to the heel of the dog walker (as opposed to be able to range out from the dog walker on a 6 foot leash). This restriction will reduce the probability of tripping other park users including, pedestrians of all ages and abilities, bicyclists, runners, and all other recreational users on pedestrian walkways, and increase the safety of everyone. . ? Implement compliance-based adaptive management that requires at least 95% of dog walkers to comply with the new regulation. A 25% rate of non-compliance will be difficult to monitor, is unfair to dogs and dog walkers who are well trained and frankly, sounds unenforceable. Additionally, in my opinion the time for allowing out of control dog walkers and their dogs more time is the last thing we want right now if the intent is to improve safety, to protect the species in the park, and improve the park user experience. ? Limit dog walkers in the park to walking 1 dog at a time as one individual is incapable of restraining and managing multiple dogs at the same time should a problem break out. ? Do Not Allow Professional Dog Walking at all, anywhere in the Parklands. Professional dog walking in a national park is not a precedent GGNRA wants to set and it is contrary to a premium visitor experience where protections and conservation of resources is the Mission. ? If the Park does allow professional dog walkers in the Park with up to 3 dogs (and I do not wish in any way for this to occur), the dog walker should be required to meet the following criteria: a. wear visibly, a current SF business license, in bold print, enabling them to walk dogs. b. Place a placard in bold print in their vehicle window, facing out, showing a current SF business license, enabling them to walk dogs c. Carry proof of current SF dog license and

rabies inoculation for each dog walked and show to park law enforcement on demand d. Be allowed to walk only those dogs who have been trained to voice, whistle or hand command and be able to demonstrate this behavior to park law enforcement on demand. e. Not be allowed to walk specified, notoriously aggressive or hunting breeds. f. Require a performance bond to be on file with the Park which will be used to defray all expenses suffered by the park by malfeasance, accidents, and rule infractions by the professional dog walker. g. The Park will provide a hotline/response team for the public to report infractions. h. The Park will provide the proper level of enforcemen to achieve their agreed to rules and goals ? Require all dog walkers to maintain proof of current license and rabies inoculation while walking dogs in approved areas of the park and show on demand to authorized park enforcement personnel as requested. ? Require all ROLAs to be enclosed to protect park users, wildlife and other dogs ? Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitat ? Do not allow any dogs on trails anywhere in the Park. ? Post prominent signage educating the public about dog walking, the necessity of having limits and the rules around dog walking ? Set up a reporting/response system to handle citizen reports of infractions. ? The Park to provide the level of enforcement required to carry out the policies established. Jan Blum

Correspondence ID: 4422 **Project:** 11759 **Document:** 38106
Received: May,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: Date 05/15/2011

Frank Dean, General Superintenden Golden Gate National Recreation Area
Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

Hello, I am writing today to express my concern about the proposed Dog Management Plan for San Francisco. I am a long time San Francisco resident. The fact that I am taking personal time, on a Sunday afternoon, to write to you should tell you how important this matter is to me.

I'm going to keep this letter brief, but I sincerely hope my words do not go unread or unheard.

I, along with many other people choose to live in San Francisco for several reasons including diversity and freedom. City life promotes diversity-

culturally, environmentally and otherwise. If I wanted my neighbors to be exactly like me I'd live elsewhere.

It has been proven that a well-behaved dog is a well-exercised dog. If we take away the few options currently available for pet owners to take their dogs for a daily run I fear we are going to have some rather unruly dogs. Then what? Have you read any of Temple Gradin's work? Others have voiced similar opinions about the domestication of dogs as well.

I agree that dogs should be kept from fragile vegetation and I understand that the future growth and development should not be impacted by the use of dogs and their owners. Perhaps some signs indicating where off leash and on leash boundaries are would be beneficial for all. It wouldn't hurt to educate users as to what specifically is at risk in the on leash areas.

I live within walking distance of Alamo Square and I walk through the park on a daily basis. I can attest that many visitors and San Franciscans go to the park "just to get their dog fix". Often times I hear people say, I can't have a dog in my building, so I come here everyday. Parents often show appreciation for the opportunity to teach their children how to appropriately interact with dogs of all shapes and sizes. The dog owners I see are responsible and clean up after their pets and watchful to ensure enjoyment for all at Alamo. It seems the proposed plan is one that will punish the majority of people (and pets) because of a very small number of uneducated, insensitive, or irresponsible minority.

As I understand it, the proposed dog management plan will eliminate dog-walking (on and off leash) access for all new lands. What a catastrophe this would be. It almost seems ludicrous to me to propose a plan limiting growth and development which will forever prevent, opportunities to foster healthy interaction between people and pets. Prejudice is born from inexperience and lack of knowledge. By limiting people's exposure to dogs we are not allowing people to develop the necessary skills to cohabitate with these domesticated animals. I agree that living in a city environment means that certain expectations must be followed. It is crucial that dogs are well trained and know how to behave in order to peacefully co-exist in an urban environment and still be allowed to get adequate exercise and socialization. Towards this end I have a few suggestions for your consideration: 1) Dog owners who enroll their dog into a reputable training course and pass the course requirements would get free dog licenses for San Francisco County (after providing appropriate health documentation from a licensed vet). 2) Reputable training courses would pay a fee (which they could collect in their program fees) to the city to run their dog training class here (ie: for each dog enrolled in Company X's Puppy 1 class there is a service fee of \$5.00-10.00/dog-most classes have about 5-10 puppies. For all dogs enrolled in Company X's Puppy 2 class there is a \$3.00-\$5.00 service fee-

for any dog enrolled in classes beyond the level 2 certification (ie: obedience training or Canine Good Citizen Certification) there is a \$2.00-\$5.00 fee. 3) Folks with dogs without a license would be fined. For each subsequent infraction the fee would increase.

I believe the plan I'm proposing (or something similar) would solve many problems. More dog owners would be inclined to take their puppy through a training course, which would foster better dog ownership and dog obedience. The city would earn some revenue (the majority of dog owners I encounter do not seem to have their dogs licensed with the city). Finally, we would be preventing (or at least reducing cruelty to dogs) by discouraging those who cannot afford to feed themselves (and their dependents) from taking on the burden of caring for a dog.

I fully expect that the San Francisco officials I've voted for can come up with some other solutions which would be of a similar approach to the ones I've proposed which would be beneficial for all. My experiences have shown me that there are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. Please won't you take into consideration some of the points I'm taken the time to outline here?

Respectfully,

Annemarie Rossi San Francisco, CA 94115

CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Let's get creative and make this a win/win for the City and residents of San Francisco!

Correspondence ID: 4423 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 26,2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not

based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). Enable professional dog walking and align any professional dog walking rules with county or city regulations. Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Steven Lyss San Francisco, CA 94107

Correspondence ID: 4424 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter

Correspondence: JANICE M. GONSALVES May 27, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Re: GGNRA / DEIS / Baker Beach

Dear Mr. Dean,

I am a sixties-something resident of San Francisco (Mt. Davidson area), and have been a very regular (almost daily) visitor to Baker Beach, where I walk my two small dogs early in the morning. I have been doing this for over 7 years. I have developed opinions about the state of Baker Beach based on those 7 years of experience.

I am very distressed to contemplate the changes which would arise if the proposed changes for Baker Beach were implemented. I love my dogs, and the dogs love the beach, but I also love our total surrounding environment and have given thought to changes to the present rules for Baker Beach which could satisfy many of the various demands from differing groups. I would propose:

Timed sessions for off-leash walking. Why wouldn't this work? I have never heard anyone give a response to this proposal. With this idea, dogs could play off-leash on Baker Beach from, say, 6 a.m. to 11:00 a.m. After that, the rule could be dogs only ON-leash, or no dogs at all. This would allow families who want to picnic without canine intruders, and any other people who would prefer to have little or no interaction with dogs to enjoy the beach. Patrols would not be necessary for those early morning hours. And during those early-morning off-leash hours, rules would be clearly publicized that all dogs needed to be under voice control. Off-leash dogs who were aggressive or behaving badly in any way could be banned or cited.

Protection of vegetation: It would not take much to make the vegetation which lies between the beach and the parking lots inaccessible to dogs. And it would not have to look ugly ' just a few more ropes. We have not been informed of any particular animals or birds that are threatened by dogs at Baker Beach. Nor has there ever been a study proving that dogs are more injurious to the, environment than their human owners,

My years of experience at Baker Beach have led me to the conclusion that it is actually the dog owners who have consistently been the true guardians of the beach. We are the ones who not only pick up our dogs' waste, but other debris off the beach and haul it to the trash containers. There are irresponsible dog owners, but they are few in number. A public relations -

public awareness campaign would be very valuable in educating all dog owners to their responsibilities.

It is difficult for me to imagine where all those Baker Beach dog owners will take their dogs if the proposed changes are made. We learned how closing just Ocean Beach (because of a tsunami alert) impacted Stem Grove ' from 60 dogs to over 200. Our dog runs tend to be small, and if their increase dog:populations were greatly increased, it seems only obvious that there will in dog aggression.

We live in a small geographical space in San Francisco, and we have a lot of dogs.. Baker Beach has very few visitors (remarkable for such a beautiful place) and neighbors a no-dogs-allowed beach next door (China Beach).

Please consider my suggestions, and also, please let me know if I can be of any further assistance.

Thank you for your consideration.

Kindest regards,

Janice M. Gonsalves

cc: The Honorable Nancy Pelosi U.S. House of Representatives 235 Cannon House Office Building Washington, D.C. 20515-0508

Secretary'Ken Salazar Department of the Interior, 1849 C Street, N.W. Washington, D.C. 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W. Washington, D.C. 20240

Correspondence ID: 4425 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: JoAnne Lee/Alex Norton San Francisco, CI 94110

May 21, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re; Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I am a San Francisco Resident that has, since moving to San Francisco enjoyed a number of the GGNRA areas under consideration ' in Particular Rodeo Beach in Marin, Lands End, Baker Beach, Crissy Field, Ocean Beach and Fort Funston in San Francisco.

I am also a ten year volunteer at the Marine Mammal Center in the Marin Headlands, I know and appreciate your work, and that of Brian O'Neill, for all the support the GGNRA has given to the TMMC over the years.

However I am dismayed at the DEIS and much opposed to the changes proposed for both generic and specific reasons which I will try to address.

? I have a very active dog, a Border Collie rescue Mix, and being active it requires DAILY running. This running is done by myself and/or our Dog Walker. She is insured and Bonded and, and I am sure of her professionalism. Everyone who knows dogs knows that a tired dog is a relaxed dog, and a relaxed dog is a well behaved dog. Off Leash exercise is so much more than on leash exercise. On leash exercise limits the dog to my level of fitness, and that means that by forcing on leash requirements you are binding the exercise of many dogs to that of handicapped, and elderly owners. My dog "forces me" to go out every day and take a walk, and although that can be in my local neighborhood it is nothing like our walks in the Marin Headlands, or Lands End paths, or along Crissy Field. Off leash walking is my time with my dog. He is always under voice control because my time at the park is my time with him ' we "work" together. These moments when my dog runs back and forth with a stick in his mouth are the reason I get in my car and go the GGNRA controlled lands. I always carry two rolls of poop bags on my leash and I will clean up other dogs poop if I find it when cleaning up after mine I also participate in dog owner's park cleanups, be it in the City or out at Funston.

? The concept of ROLA is astonishing. As far as I can understand The NPS self appoints itself to monitor a compliance level of 75% based on total dogs observed not in compliance . Who does the observing? A third party? When do the observing? Of course, for it to be legal I presume it will be done for 365 days every day from 5 am to 10pm when the parks close, because, if there is no one there to observe and 100 dogs use the park, and are in compliance they will not be tallied, which means your data is invalid. As you can see ROLA is non-sensical in the way you define it, in the way you set it up to self police, but even more so in the way you ascribe to yourself the powers to make reductive changes to the use of the park without proper due process. The Poison pill has to be eliminated from the plan as it is unenforceable and lacks any kind of scientific basis (unless, of course you

can observe all users all the time)

The fact that this NOLA Compliance based criteria is included in all options automatically disqualifies your alternatives ? The DEIS does not seem to consider demographics: Answer a question ' is dog ownership in San Mateo/San Francisco County/Marin increasing or decreasing? All the studies I have seen it is increasing. Therefore, as caretakers for lands given your trust for recreational purposes by those counties should you not take that in consideration and offer an alternative where you INCREASE off leash areas? Off leash areas, at the time of the 1979 Pet Policy was limited to only 1% of all the lands you administer. Since then new land has been added but you have DECREASED the percentage of those lands to below 1%. Why is there no alternative where you reflect demographics and the desires of the citizens of those counties who gave you the land and offer another alternative where you increase these lands? Alternatively, since you only have 1% of lands open to dogs, why not, if you take certain areas away can you not have an alternative where you give back other lands now currently closed? I would have loved to have seen somewhere in the DEIS something along the lines of "We are proposing removing XXXX from off-leash areas, but are opening up YYYY to off-leash use." You have the space. Why not use it?

? Your purposes, for the GGNRA is for RECREATIONAL purposes. These lands are NOT National Parks ' they are ex army installations and they were given in trust for you to administer in keeping with the original deed. You appear to treat Recreation as having an inverse impact on the areas under consideration, ignoring that Recreation WAS and IS one of the four outstanding values mentioned in the 1972 enabling legislation I quote : "maintenance of needed recreational open space". When Daphne Hatch your chief of natural resources management and science at the GGNRA says Quote: "Ocean Beach without the people is an incredible habitat, But people think of it as a sandbox or their backyard." I truly wonder if the NPS knows the difference between Yosemite and Fort Funston or Ocean Beach". When I attended one of you open houses I was told that I was told that NPS is mandated by Congress to "manage uniformly all its areas" she forgot also to tell me that Congress added "The authorization of activities shall be construed and the protection, management, and administration of these areas ... shall not be exercised in derogation of the values and purposes for which these various areas have been established". So there is no mandate to match the GGNRA's policies with National Park Service requirements that dogs not be allowed off-leash in a national park.

? Snowy Plovers: Your own research - Forrest Cassidy St Clair and Warren all demonstrate that dogs do not actually impact the diversity, abundance and feeding behavior of the birds. The Hatch report observed 5692 dogs and only 19 chased plovers. Your own studies prove that parents with toddlers,

surfers and other park users disturbed the plovers far more than dogs, yet I do not see anything in the DEIS that is further restricting their access. Why are dogs being singled out? Your environmental impacts are a whole bunch of "could occur" "may occur" but I do not see a single study that backs this up. You mention Bank swallows, and their nests, but they burrow in the cliffs, areas that dogs simply do not go to. . Ultimately your environmental studies do not seem to support your conclusions and you can be taken to task on this. I have tried to read the DEIS but I have failed to come across any actual solid scientific data that supports your premises. I see a lot of "coulds" and "mays" but no actual evidence and no baselines ' None. In fact, the one study I did read in full ' the one above ' demonstrated exactly the contrary to the "results you would have preferred. You had all the time to back up your claims with hard data. The fact is you have not been willing to do s - discrediting the scientific basis of this DEIS, or, worse still, the data contradicted your preferred solutions, and you have chosen to ignore it. I could not find an comparative analysis of the "No Action" option. The impacts appear based on on non-compliance to existing voice control and existing regulations. At some sites, the DEIS prohibits dogs from beach areas to protect shorebirds and stranded marine mammals, yet there is no documentation in the DEIS of current shorebird or marine mammal impacts caused by dogs.

? So if you have no sound scientific data to support the environmental reason to restrict areas to dogs let's look at the safety issue. Well in this case your data is overwhelming in pointing to what are the causes of serious safety incidents ' 98% DID NOT INVOLVE DOGS. The problem is people, not dogs. Only 2% involve dogs. This alone should really force you to re-think the whole reason for the DEIS.

? The DEIS is concentrated on dogs, and ignores impacts caused by people and their children, mountain bikers, fleet week, walk-a 'thons, feral cats, coyotes, horses, surfers, etc etc. In other words. The DEIS appears to be a targeted exercise. Not a 360 degree look at the panorama affecting the GGNRA

? Why is the current system not working for you? Are you able to enforce the current No 'off leash zones? They are 99% of the lands you administer. If you can do it now why the need to change? If you cannot do it now, what additional funding will you require to ensure the new areas will be enforced?

? You TOTALLY ignore the impacts that these policies will have on the surrounding areas. If you squeeze dogs out of GGNRA lands where will they go? To overloaded City Parks ? Have you involved the City in this plan? You also have totally ignored the beneficial and human impacts of off leash interaction with one's pet. As I mentioned above, My mother cannot run so

why are you wanting to limit the dog's exercise level to hers? She currently can play with our border collie and use a chuck-it with minimum effort for her and maximum effort for the dog. When I go to the park I see people playing with the dogs of all ages, races and, presumably, financial background. I do not see anything in your study except a rather curious reference to "minorities" not coming to the parks because of dogs - The DEIS cites a 2007 SF State study that claims all Latinos and Asians surveyed said that dogs were a problem but if you actually read the study you discover some things: a) the study was not, as the DEIS implies an "ethnic minority visitor use experience at the GGNRA" but was actually a study born to help connect minorities to the parks. But more damning the study was hardly a scientific one ' they interviewed fewer than 100 people and they were not randomly selected. It is this kind of "selective" scientific use that will have the words "Drake's Estero" popping up in people's minds.

In conclusion it appears that this is a misguided solution in search of a problem. Your data simply does not support the existence of the problem, and your attempts to squeeze a NPS agenda on local parks is misguided and contrary to the spirit with which these lands were entrusted to you.

The more I look at the lack of data, the more I fear that, what the Dept. of Interior report said about Drakes Estero can be applied to this DEIS and that it exhibits "sloppiness, from a protective approach to data, from a lack of vision, and from an insensitivity to the growing controversy, but not from any obvious intent to deceive, defraud or mislead." I really hope you are not trying to mislead but the lack of any evidence to your premises, causes great reason to wonder if the NPS does have an anti-dog which will be forced upon these Recreational Lands regardless of their negative impacts.

For all the reasons stated above, but in particular for: 1) The existence of a "Poison Pill" compliance override on all the alternatives 2) The lack of scientific data supporting your premises I support Alternative A ' the N i. ction-A-Iternative and would also include New Lands area in that

Respectfully Alex Norton San Francisco

JoAnne Lee San Francisco

CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Correspondence ID: 4426 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence: Letter

Type:

Correspondence: Justin Clark Corte Madera, CA 94925

May 24, 2011

Mr. Frank Deon General Supervisor GGNRA Fort Mason Building 201 San Francisco, CA 94123

Dear Mr. Deon:

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA.

I was born in Tiburon and grew up here in Marin. A large part of what I love about Marin is our amazing weather and the ability to enjoy the outdoors all year round. Throughout my life, I've had a number of dogs and love that I can share a walk and fresh air with them.

My dog is part of my family and restricting my ability to enjoy the beautiful outdoors with him is unfair. Kody, my dog, is well behaved and I am strict about cleaning up after him when we are out exploring. We follow the rules and are respectful of the land and other animals. Why would you penalize me? Please, don't deny my right to enjoy my town with my dog.

Thank you for listening. Please, reconsider this restriction. Sincerely,

Justin K. Clark

Correspondence ID: 4427 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 26, 2011

Frank Dean, General Superintendent Golden Gate National Recreation Area
Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was

designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities.

Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Enable professional dog walking and align any professional dog walking rules with county or city regulations.

Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Michael Casassa San Francisco, CA 94107

ID:

Received: May,20,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: To: Mr. Frank Deon General Supervisor,GGNRA Building 201 Fort Mason San Francisco, Ca. 94123

Dear Mr. Deon,

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA. The Bay Area is a model for enlightened co-use of our natural resources. The availability of nearby areas for the tax paying dog owners to exercise their animals and maintain a healthy lifestyle is necessary for a balanced society. Dogs have been living with humans as helpers and companions for countless generations. To deprive this natural pairing of-the opportunity to enjoy nature together would be a mistake with unforeseen consequences.

Sincerely,

Carmack McCormick

Correspondence ID: 4429 **Project:** 11759 **Document:** 38106

ID:

Received: May,20,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: To: Mr. Frank Deon General Supervisor, GGNRA Building 201, Fort Mason San Francisco, CA 94123

Dear Mr. Deon,

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA. The Bay Area is a model for enlightened co-use of our natural resources. The availability of nearby areas for the tax paying dog owners to exercise their animals and maintain a healthy lifestyle is necessary for a balanced society. Dogs have been living with humans as helpers and companions for countless generations. To deprive this natural/pairing of the opportunity to enjoy nature together would be a mistake with unforeseen consequences.

Sincerely,

Fabian Rapetto Mill Valley, CA 94941

Correspondence ID: 4430 **Project:** 11759 **Document:** 38106

ID:

Received: May,25,2011 00:00:00

Correspondence Letter

Type:

Correspondence: MICHAEL C. MEAD SAN FRANCISCO, CA 94117

May 22, 2010

Frank Dean, General Superintendent Golden Gate National Recreation Area
Building 201. Fort Mason San Francisco, CA 94123-0022

Dear Superintendent Dean,

First let me introduce myself. I am a 72-year-old avid dog person and nature lover. I love ALL nature and being able to enjoy many aspects of it is very important.

We are all creatures of God and all must share the planet equally. I do not believe in singling out one creature over another. Urban areas must be treated differently than wild areas. Wildlife should not be given quarter over domestic animals/life in the middle of an urban area. If that were the case, then none of us could live here.

I belong to the Marine Mammal Society, The Wood River Land Trust, World Wildlife Fund, Best Friends Animal Society and Crissy Field Dog Group to name a few.

I take my golden retriever to Ocean Beach and Crissy Field at least once a week. Having a water dog means having to be able to access water. Wacko loves to swim and infact, it is part of his well-being. As a responsible dog owner, I pick up after him and keep him under voice command. It is very important that these areas remain off leash dog walking areas, both for the health and welfare of the dog and of the owner.

Has the GGNRA studied the impact on the natural resources from ALL the other activities that occur in these areas, such as walkers, bikers, kite flyers, runners, picnickers etc. etc. Why has the GGNRA chosen to single out dogs?

Have there been studies done to suggest that the dogs do more damage to natural resources as compared to other activities?

Where there are very sensitive wildlife areas, they should be WELL marked. We responsible dog owners are concerned with preserving our natural resources and need a little direction as to where these areas are. I do not agree with the GGNRAS' current preferred alternative as it restricts and

eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the 1979 Pet Policy and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

I support Alternative A, the No Action alternative, which would also include "New Lands" within San Mateo County. Respectfully submitted,

Michael Mead

CC The Honorable Nancy Pelosi United States House of Representatives
235 Cannon House Office Building Washington, D.C. 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street, N.W.
Washington, D.C. 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W.
Washington, D.C. 20240

Correspondence ID: 4431 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 20, 2011

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

Cc: Congresswoman Nancy Pelosi Senator Dianne Feinstein Senator Barbara Boxer Dept. of the Interior Secretary Ken Salazar Congresswoman Lynn Woolsey State Senator Mark Leno State Assemblymember Jared Huffman

Dear Superintendent Dean,

I am writing to ask that the GGNRA reconsider its position regarding the ability of dog owners to enjoy the park with their pets. I have lived in Mahn for more than 20 years, and have enjoyed taking our dogs to Muir Beach, where up until now they have been able to enjoy the beach without diminishing anyone else's enjoyment...indeed, they often bring smiles to those who can observe them at play. They are always under my voice command, and I have never encountered a problem with them being off-leash, and it saddens me to think that this special place may be off-limits to them in the future.

There is very little in the DEIS that makes a sound argument for banning dogs from practically all GGNRA areas...the threat to wildlife, for example, seems more imagined than real, as my dogs generally ignore wildlife and even those dogs that approach wild birds pose no real threat, as birds can easily escape harm and with real predators in their environment, it's hard to make the case that they are being disturbed to a degree that banning dogs is an appropriate solution. As for environmental damage, most pet owners are responsible for cleaning up after them. People, on the other hand, contribute far more trash and environmental damage than do their dogs, not to mention horses (although I have no problem with them and am glad that they're allowed). In the rare situations where a dog is disruptive to a person's park experience, I feel it is much more appropriate to handle these situations the same way as would be the case if a person is causing the disturbance (i.e., reporting the incident to a ranger or other official) rather than simply banning dogs. If this logic was followed to its conclusion, the GGNRA would have to ban people on the basis that they might cause a disturbance.

Please reconsider the draconian proposal to ban dogs from the many places in the GGNRA where they have historically been allowed access without causing significant problems. Give responsible dog owners the opportunity to demonstrate that they can coexist with non-dog owners so that the GGNRA can be enjoyed by all.

Sincerely,

Dan Reich, San Rafael, CA

Correspondence ID: 4432 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr Dean,

I am writing in opposition of the GGNRA's draft dog management plan. I live in San Mateo county and use Fort Funston and Ocean Beach areas with my 9 year old dog Bailey. We would be heart broken if the plan were to be implemented!

I am a nature lover who appreciates conservation of all flora and fauna. I also believe recreation of people and dogs can co exist with conservation.

Here are some things I would like to point out:

speculation and not supported by proper scientific studies or environmental

impact studies.

-The GGNRA was created as a nature AND recreation area. Please do not take recreation out of this equation. The 1979 pet policy states what the land should be used for and has been repeatedly upheld in court.

-Dogs are already prohibited in so many area like state parks, National parks and Peninsula open space areas. I have read that only 1% of local land is available for off leash activities. There are so many of us responsible and nature respecting dog owners and we truly need the GGNRA areas for off leash recreation with our beloved pets.

-When Dogs are on leash, they tend to be much more aggressive towards each other. This phenomenon would result in significantly more dog on dog aggression and human collateral damage when trying to break up their dogs.

-I agree that the cliffs can be dangerous. I believe the cliff and Snowy Plover areas should be fenced off and feature prominent and highly visible signage to keep people and dogs out of there.

Thank you for reading this and I hope it was informative and helps to save off leash dog walking in GGNRA areas. Sincerely,

Alexander Feldman

cc Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives; Ken Salazar, Secretary of Interior; Jon Jarvis, National Park Service Director; Congresswoman Jackie Speier

Correspondence ID: 4433 **Project:** 11759 **Document:** 38106
Received: May,20,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 17, 2011

Dear Frank,

I am very concerned about the possible changes at Fort Funston, Ocean Beach and Crissy Field. Being a native San Franciscoan, I've enjoyed the many years spent at these beautiful spots with my family, guests from all over the globe, and of course my dogs. Have met many friends throughout these years. The terrain is unspoiled including birds & wild plants, giving us a time to relax and enjoy the environment. I see everyone smiling, relaxed, & doing their very best to keep all of these places clean and natural. In this

world of so much trauma, violence, & stress, we need to be able to look forward to spending time with people, animals off lease playing and God given beauty.

Sincerely,

Arline Roncella Daly City, CA 94015

Correspondence ID: 4434 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 23, 2011

To: Frank Dean, Gen. Supe. GGNRA, Bldg. 201 SF, CA 94123-0022

I am a senior citizen who walks at Fort Funston everyday. I do not have a dog. I feel safe out there becuase there are so many people walking dogs. I have seen nothing out there that justifies this horrible dog plan you have come up with. Restricting areas for dogs will lead to more conflict, not less conflict. Places like Ft. Funston are urban parks (no matter how much you deny it) not true wilderness like Yellowstone and Yosemite. The plans you have come up with are insane. You seem totally unaware of how to manage RECREATION areas. You denied true public comment opportunities. Your plan is set up to failbut that's what you want, isn't it? Then you can totally kick people and their dogs out with no recourse for the public to fight it.

p.2

If you wonder why people hate government it's because of actions taken by govt. You do not allow open public comment, you set up plans that will nto work. You are basically tyrants and should have no business running recreation areas in cities.

I OPPOSE ALL OF YOUR PROPOSED PLANS. You need to honor the 1979 Pet Policy.

Margaret Bert SF, CA 94131

Correspondence ID: 4435 **Project:** 11759 **Document:** 38106
Received: May,20,2011 00:00:00
Correspondence Type: Letter
Correspondence: To: Mr. Frank Deon General Supervisor,GGNRA Building 201 Fort Mason

San Francisco, Ca. 94123

Dear Mr. Deon,

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA. The Bay Area is a model for enlightened co-use of our natural resources. The availability of nearby areas for the tax paying dog owners to exercise their animals and maintain a healthy lifestyle is necessary for a balanced society. Dogs have been living with humans as helpers and companions for countless generations. To deprive this natural pairing of the opportunity to enjoy nature together would be a mistake with unforeseen consequences. Sincerely,

Maria Ask-Hed Mill Valley, CA 94941

Correspondence ID: 4436 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear GGNRA Directors,

I am a native San Franciscan. I was a responsible dog owner. There are over 120,000 dogs in SF. Thats lot of dog poop. While some believe their dogs are meant to roam free in our public spaces, I and many others don't. The GGNRA has many threatened and endangered species that need our help for survival. This should be of the highest priority.

People have the right to enjoy the outdoors with out dogs interfering with their experience. Especially at the beach or park with our families and picnics. Owners and their dogs don't have a right to interfere with people enjoying public parks and spaces. Most people don't like dogs and do not think they are "cute". Its very scary to be "hounded" by dogs on or off leash. I am rehabilitating a serious injury and am affraid of being injured by dogs running into me. My girlfriend is deathly scared of large dogs as are her elderly parents.

Owners of dogs need to educate and police themselves about common sense rules, policies and code requirements for dogs in the GGNRA. Dogs have been getting away with running free throughout the GGNRA for too many years. This may be why so many dogs are around. The beach is a great doggie bathroom. What happened to curbing your dog and being in voice command. Wiping dog poop off of grass or sand is not enough. Would you lay your towel or blankets near where someone just picked up dog poop? More signs or fences are visual blight and costly. What is needed is Park Rangers to aggressively ticket owners that ignore rules and codes.

Professional dog walkers need to be registered, insured and bonded for public safety. Paying a user fee is not off the table. Special Bright collars for registered dogs and pin on visual permits for walkers may be useful.

As Directors and stewards of the Golden Gate National Recreation Area you need to do the job of making tough calls to enforce current national codes and policies a priority. If your new proposal is more stringent then it is probably required. People that don't have dogs need places to relax too. No dog poop at the beach or other public spaces would please many. This is not a political problem. This is an over population of DOG problem.

thomas t. theriault Glen Park SF

5-19-11

Correspondence ID: 4437 **Project:** 11759 **Document:** 38106
Received: May,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: May, 17, 2011

Hi NPS,

Just wanted to let you know that one of the most beautiful places in the world is Marin County and I appreciate all that the Park Rangers due to protect the beauty of our precious landscape.

Marin County is an extremely dog-friendly area. We love our dogs, take good care of our dogs and we treat them like family members. Dogs are great for enjoying the outdoors and are great companions on when spending a day at the beach or going for a nice long walk.

To take away our right to have a companion with us in our beautiful great outdoors, is an absolute shame. No matter how people try to justify the reason for not allowing dogs, we all know it just doesn't make sense. Dogs don't hurt the land and the fragile eco-systems, humans do.

On behalf of every dog-owner in Marin County, please do not take away our right to have our companions outdoors with us, whether its on the beach, on a hike, or just sitting outside on a sunny day in the park. There is just no reason to take away this natural right to be free outdoors and be able to have your companion with you.. yes, that companion, is often people's dog. Thanks for your time!

Sincerely,

Caitlin Hevia

Born and raised in Marin County and currently a resident of Sausalito.

Correspondence ID: 4438 **Project:** 11759 **Document:** 38106

Received: May,18,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

I have lived in Mill Valley with my husband for the past 16years, and prior to that I lived in San Francisco for 10years. I am a Native Californian. Proximity to a National Park and Recreation Area for our family and our dog's recreation, played a major role in our decision to move to Mill Valley. It is critical for my husband and I to be able to exercise with our rather large (95 lb), 2.5 year old, Rhodesian Ridgeback, on and around Mount Tamalpais. We are on the Mountain, with our dog, Renzo, 3-5 times a week. We require a vast open place where we can exercise our dog and ourselves at the same time! We utilize Miwok Trail, Matt Davis Trail, Coastal Trail, Muir Beach, trails out from Tennessee Valley, Old Railroad Grade, Ocean Beach, as well as the Presidio, to name a few. Our dog is predominantly off leash, under voice control, and we are mindful to place him on a leash, whenever we approach bikes or horses and hikers/runners without dogs.

A key unique feature of Marin is the wonder of living within striking distance of a major metropolitan city, while being surrounded by open space for recreation and leisure. Recreation, was a major priority in the establishment of the Golden Gate National Recreation Area. The DEIS gives very little reference to recreational uses and in no way addresses the very important issue of the human recreational environment. Dogs and humans both need time to, "Run Free" and to be, "Off Leash." Dogs as well as humans who do not exercise become restless, anxious and aggressive.

We do not agree with the GGNRA's proposal. The DEIS rationale for the restriction of dogs is not based on scientific research. The document fails to provide documentation, or legitimate scientific studies, that demonstrate that dogs are having a significant negative impact on the animals and the environment. We believe that the GGNRA Commission must provide scientific evidence that the harm being done is due to dogs alone, rather than humans, horses, bicycles, and other forms of recreation taking place in the area.

Thank you for your time and attention to this very important matter.

Sincerely, Annette Sullivan

Dennis Sullivan

Correspondence ID: 4439 **Project:** 11759 **Document:** 38106

Received: May,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: Pacifica Shorebird Alliance

Noel Blincoe Victor Carmichael Bill Collins Dyer Crouch Paul Donahue
Edwin Geer Margaret Goodale Mary Keitelman Ron Maykel Clark Natwick
Frank Dean, General Superintendent, Golden Gate National Recreation
Area, Building 201 Fort Mason, San Francisco, CA 94123-0022

5/20/2011

Dear Superintendent Dean:

The Pacifica Shorebird Alliance (PSA) would like to salute you and your staff at GGNRA in your efforts to shape a reasonable and effective policy with respect to allowing dogs in the Golden Gate Recreational Area. No doubt there are other objectives in your policy revision efforts but protecting species that are federally listed as threatened or endangered species is obviously of primary concern. One would think protecting any species, which is moving slowly toward extinction, from untoward disturbance would be a non-controversial and accepted function of the National Park Service. However establishing or revising any policy with respect to dogs within any public space is always controversial. Dog owners collectively are a powerful and motivated lobby.

The problems for GGNRA in protection of the Western Snowy Plover, a federally protected species, in the Crissy Field area of the Presidio very much mirrors the problems we in PSA have encountered at Pacifica State Beach. Like areas near popular Crissy Field, Pacifica State Beach, located at the southern end of Pacifica, supports a significant numbers of over wintering Western Snowy Plovers and was once a nesting site. Over the years humans and dogs have led to habitat degradation and the population of snowy plovers has declined. Pacifica State Beach is a popular beach for surfmg, fishing, dog walking, picnicking and sunbathing (on warmer days), etc. Furthermore, unfortunately it is also adjacent to suburban housing on two sides with easy access to the beach. Consequently there is strong

resistance to any restrictions on activities especially with regard to dogs.

In terms of the specifics within the proposed rule changes, we would like to make two recommendations: 1) Areas allowing off-leash walking must be very well marked or fenced; 2) The NPS goal of 75% compliance should be raised to 95% compliance at least in the most sensitive areas, those adjacent to threatened species' habitats.

A properly implemented and publicly accepted policy by GGNRA within its lands and beaches with respect to dogs, leashed and unleashed, would certainly help us in our efforts here in Pacifica. Again, we would like to commend GGNRA on its efforts to strengthen protections of wildlife within GGNRA by revising dog walking rules.

Correspondence ID: 4440 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mrs. Sally Levinson Berkeley, CA 94705

Dogs Suck!

Can't bear the thought of dogs destroying wildlife at GGNRA.

Please do your best to keep dogs out.

Too many dog owners are selfish and irresponsible.

Thanks,

Sally Levinson

Correspondence ID: 4441 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Hannah Kornfeld and I am a twenty two year old Bay Area resident. My family has lived in Marin my whole life and our household has always had the love of our canine friends. Maxi and Shadow, our two Labrador retrievers, lived to be 18 and 16 respectively. They were a huge part of the family and I fondly remember going on bike rides with my mom, dad and sister at Crissy Field and having the two dogs trail loyally behind the family. This unique city experience was only possibly because there are

some areas with out leash laws.

Currently my mom and I have a young brown lab, Mabel, and we enjoy running and hiking with her around the Bay Area. We usually stay in Marin where Mabel can run around on the trails, smell to her hearts content, and not be restricted by a leash. It is very important that Mabel be able to move at he own pace and get some fits of energy out and also smell the exciting world around her. If you pass laws so there are no leash free areas in San Francisco, Mabel's city counterparts will not have space to explore and exercise at their own pace.

To keep a dog and his owners happy and healthy, the dog must have access to off leash walking. For many of my dog walking friends, going to Crissy Field is a necessary part of their day. They love the place and so do their dogs.

Instead of taking away off leash areas, I think the GGNRA should consider adding new areas, and providing better signage and environmental barriers like the ones at Crissy Field. The draft Dog Management Plan and the Draft Environmental Impact Statement does not evaluate the value of these recreational activities and does not adequately consider alternatives such as environmental barriers and providing better signage and education to the public.

Moreover, there is inadequate consideration of the impact of restricting off leash dogs on east beach at Crissy Field on the families that gather there for recreation. During many months of the year central beach is not safe because of the high tides. The proposal does not adequately investigate the impact on families of having to use Central Beach year round rather than east beach. There is also no science based explanation for moving off leash dogs off east beach. Please evaluate these alternatives and impacts. Major urban areas such as San Francisco need more places to recreate with dogs off leash, not fewer.

The GGNRA was created with the purpose of providing recreational opportunities for people. This includes off leash walking at sites like Crissy Field. The citizens of San Francisco benefit greatly from these opportunities. Please do not restrict off leash walking on these sites. Respectfully,

Hannah Kornfeld

Larkspur, California 94939

CC:

Representative Nancy Pelosi, 8th Congressional District of California,

House Minority Leader, U.S House of Representatives

Ken Salazar, Secretary of the Interior

Jon Jarvis, National Park Service Director

Crissy Field Dog Group

Correspondence ID: 4442 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Comments: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

I am writing this public comment on the GGNRA's Draft Dog Management Plan/Draft Environmental Impact Statement (DEIS) as Chair and representative of the San Francisco Dog Owners Group. SFDOG is the largest citywide dog owners/guardians group in the city, with a thousand active members, and at least a thousand more that we reach regularly through our emailed newsletters and listserves. SFDOG pushes for responsible dog guardianship, and advocates for off-leash recreation for dogs that are under voice control. We are a 501(c)(3) nonprofit, and work to educate dog guardians, non-dog people, and elected and appointed officials about responsible dog guardianship and the benefits of having a dog in our modern, often isolated, society. We have organized workshops on how to deal with the three most common dog behavior problems seen in parks (poor recall, jumping, and resource guarding), and publish a Park Petiquette flyer (how to behave in a park with your dog) that has been posted in city parks for years.

We conducted a Dog-Horse Socialization workshop to desensitize dogs to the presence of horses. This workshop was conducted in conjunction with the SF Police Department's Mounted Patrol unit, who provided the horses and riders for it. We organized workshops on understanding dog body language and behavior for gardeners and rec center staff of the SF Recreation and Park Department. We helped design and implement a pilot "Kids Read to Dogs" program (called Pawsitive Reading) with the SF Boys and Girls Clubs to foster literacy in at-risk populations of children. We work with members of the SF Board of Supervisors, along with SF Recreation and Park Department staff and the Neighborhood Parks Council, on dog issues in parks and elsewhere in the city. SFDOG had two representatives on the GGNRA's Negotiated Rulemaking Committee, and has been involved in off-

leash (and other dog-related) issues in the GGNRA for over a decade.

This DEIS for a new Dog Management Plan is an extraordinarily flawed document. Indeed it is fatally flawed. Frankly, it should be an embarrassment to the GGNRA and the National Park Service. It is extremely biased against dog walking, not the impartial analysis of alternatives that a DEIS should be. It is full of mistakes, misrepresentations of data, and misleading literature citations, all of which lean in one direction ' "proving" dog walking is bad. Not a single misrepresentation or mistake would lead you to say that dog walking is beneficial or even that it is not a bad thing. Mistakes are bound to happen in a document of this size, but when they all push the analysis in one direction only (dog walking is bad), it's not just sloppy work. It is outright bias. And that kind of bias has no place in a DEIS.

The National Academy of Sciences evaluated the work of National Park Service scientists regarding an oyster farm in Drakes Bay at Point Reyes National Seashore. The NAS report found that NPS scientists "selectively presented, overinterpreted, or misrepresented the available scientific information" and "exaggerate[d] the negative and overlook[ed] potentially beneficial effects." The exact same criticism can be leveled at the way scientific information is presented in the DEIS. Because of this, the analysis of alternatives and selection of a preferred one in the DEIS cannot be accepted.

The DEIS focuses solely on impacts on the natural environment, ignoring the human and urban environments that a DEIS is required to consider. It does not consider negative impacts on the health of people walking dogs if they lose the ability to hike in the GGNRA with their dogs. It does not consider impacts on recreation of the various alternatives, despite the fact that recreation is one of four core values to be maintained and protected in the GGNRA, as described in the enabling legislation. An analysis of impacts on recreation must be done as part of a DEIS, but it was not done here.

The DEIS intentionally ignores impacts on the surrounding communities, even though a DEIS is required to look at that. Indeed, if you read the first 1,000 pages of the document, you would never know that the GGNRA is located within and immediately adjacent to a city of 800,000 people (not to mention the millions who live in the Bay Area). This gross misrepresentation of the surrounding communities is intended to give the impression that the GGNRA is just like isolated wilderness areas such as Yellowstone and Yosemite National Parks, and therefore to bias the interpretation of impacts in one direction ' against dog walking. That is not fair and has no place in a legitimate DEIS.

The DEIS is full of things that "could" or "might" happen if dogs are

allowed in areas, but provides no evidence that such negative impacts ever have or are now occurring at each site in the GGNRA. Actual documented impacts and damage are essential to make a reasoned choice between alternatives, and are required to be included in a DEIS. But they're not here, and their lack means this document cannot be considered a true DEIS, and its analysis of the alternatives is fatally flawed. There is no baseline data of conditions at each site in the document, something a DEIS is required to include. Indeed, there is no information about how many people visit each site, how many have dogs, how many acres are at each site and how many of those acres are accessible to people with dogs, how many miles of trails are available, what people with dogs do at each site, etc. Without this baseline information, including documented impacts at each site, an informed analysis of alternatives and selection of a preferred alternative cannot be made. The DEIS incorrectly assumes, in its comparisons of alternatives, that there is no impact on natural resources unless dogs are present. Any impact from dogs has to be considered in context with other causes of impacts ' people, natural predators, weather, etc. For example, you cannot say that making a trail "no dogs" will lead to less compaction of soil because people (who cause much more soil compaction than dogs due to their much heavier weight) will still be allowed to walk on the trail. You cannot assume that imposing more rules on dogs will lead to fewer impacts, yet this is what the DEIS does. You have to look at any alleged or potential impacts from dogs in the context of other causes of those same impacts. How much comes from dogs and how much from other causes? How much actual benefit will result from banning dogs? The DEIS does not do this, and therefore its analysis of alternatives and selection of a preferred one cannot be accepted.

The DEIS is based on the assumption that non-compliance with leash laws has a negative impact on the natural environment. But there is no evidence presented to back up this assumption. It is, therefore, unfounded, and should not be used in the analysis. However, it was used by the DEIS to "prove" that the No Action Alternative is untenable. The analysis of alternatives and selection of a preferred one based on this assumption is flawed and cannot be accepted. Impacts must be substantiated, not assumed. The DEIS must be based on science, not opinions.

The DEIS does not present a correct analysis of the No Action Alternative. Rather than just assume it cannot work (which the DEIS does, without proof), the DEIS should have considered management practices that could be implemented to address issues raised. For example, in part because there's no baseline of conditions at each site, the DEIS does not acknowledge that signage of areas that are closed to dogs is extremely poor (if not non-existent) at Fort Funston, and that improved signage could make a major difference in compliance. Because management practices to improve the No Action Alternative were not considered, the DEIS' analysis of it and other

alternatives cannot be accepted.

The DEIS calls for a Compliance-Based Management Strategy (CBMS), that will change the status of on- and off-leash to "no dogs" areas in the GGNRA based solely and simply on whether there is enough compliance with the restrictions proposed in the Preferred Alternative. The DEIS assumes non-compliance results in negative impacts on the environment, but provides no evidence to support this assumption. Without such evidence, the DEIS cannot say that the CBMS will result in any additional protection of resources. There is, therefore, no justification for the additional restrictions on dogs provided by CBMS, and it should be removed.

In addition, the DEIS provides no information on how this compliance monitoring will be done or by whom. That information is critical to evaluate the value and possible negative and positive aspects of the CBMS and must be provided in a DEIS that assigns it such an important role. Without it, any discussion of how monitoring will be done and by whom, the CBMS cannot be accepted.

The changes proposed in the CBMS will be automatic and permanent, with no opportunity for public comment at the time the change is made. Indeed, it appears to have been included solely to change the status of areas from off-leash to on-leash to no dogs without having to go through any public process when the change is actually made. This contempt for public comment has been a constant theme throughout the decades that the dog community has been dealing with the GGNRA.

When the GGNRA announced in the Federal Register in 2006 that it would conduct a DEIS for a new Dog Management Plan in the GGNRA, a private citizen, Suzanne Valente, submitted a FOIA request asking for the data, documents, and/or Staff Reports that substantiated the GGNRA's claims in the Federal Register that there was a controversy over the dog policy, compromised visitor and employee safety and resource degradation that warranted a DEIS. The GGNRA replied that: "The Staff Report and other documents you seek do not exist at this time." Either the GGNRA had no data and made an arbitrary and capricious decision to pursue the DEIS, or the GGNRA refused to give the information that it did have to a citizen who legally requested it. Either explanation is troubling and calls into question the very basis for the DEIS.

Two separate court cases, several years apart, found that the GGNRA ignored the need for legally required public comment periods when it closed access to land at Fort Funston to all visitors (not just those with dogs) and when it rescinded the 1979 Pet Policy. Indeed, several hundred people who attended a meeting of the GGNRA Citizens Advisory Committee in January 2001 to protest plans to rescind the Pet Policy were not given the chance to

speak at that meeting. They were told they would be given the chance to speak at a later meeting, but it was never held. The GGNRA and its Citizen Advisory Committee essentially denied hundreds of people the chance to speak, even though they were present and ready to do so. Similarly, during the public comment period for this DEIS, the GGNRA has refused to hold any public hearing to listen to people's public comment about the DEIS. The pattern of refusing to listen to what people have to say continues. Now we read about the CBMS's plans to change off-leash areas to on-leash and then to "no dogs" without any public comment on the changes. This is not the way government should work. It is not the way government should treat its citizens. CBMS has no place in a Dog Management Plan and must be removed.

Considered individually, each of these problems with the DEIS are damning. But when taken together, it is clear that the DEIS is so deeply flawed that it cannot be fixed. The analysis essentially needs to be thrown out and done over in an unbiased, science-based way. Given the lack of evidence of any impacts from dogs in the GGNRA in this DEIS, it is clear that if a DEIS is done in an unbiased, science-based way, it will be evident that there is no need to change the 1979 Pet Policy.

The GGNRA should choose the 1979 Pet Policy (including returning to off-leash access in the plover protection areas at Ocean Beach and Crissy Field since the DEIS does not present any evidence that the presence of dogs in these areas has any impact on snowy plover populations or survival rates) as its Preferred Alternative. In addition, dogs (both on- and off-leash) should be allowed on at least some of GGNRA land in San Mateo County (none of which was part of the GGNRA in 1979 when the Pet Policy was created) especially where it has traditionally been practiced, such as Sweeney Ridge. Dogs (both on- and off-leash) should also be allowed on land that becomes part of the GGNRA in the future, especially wherever it has traditionally been practiced. You can think of this as the A+ Alternative.

Note that despite the poor quality of literature citations and the lack of evidence of impacts by dogs provided in the DEIS, GGNRA staff claim the DEIS "proves" the need to severely restrict access to people with dogs. GGNRA staff have a demonstrated bias against dog walking and cannot fairly and impartially analyze the public comments about the DEIS that are submitted as part of the NEPA process, particularly those comments that are critical of their own work (like this entire letter). The National Park Service must arrange for an independent entity to analyze the public comment and to determine what changes must be made to the DEIS and Draft Dog Management Plan to address the comments or whether this DEIS is so fatally flawed that it has to be thrown out and started over. If GGNRA staff are allowed to decide which criticisms of their work are valid and which can be ignored, the public will lose confidence in the fairness of the NEPA

process with regard to a new GGNRA Dog Management Plan, and any resulting plan will be viewed as biased and illegitimate. Independent review must take place.

IMPACTS ON RECREATION

Recreation was at the heart of the creation of the GGNRA. The GGNRA began as part of the Nixon Administration's 1970 campaign "to bring parks to the people", and to increase outdoor recreation in urban areas (U.S. Dept of Interior news release, September 14, 1970). The first two sentences in the legislation that created the GGNRA are:

In order to preserve for public use and enjoyment certain areas of MarM and San Francisco Counties, California, possessing outstanding natural historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the recreation area, the Secretary of the Interior (hereinafter referred to as the "Secretary") shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. (PL- 92-589) (emphasis added)

The legislative history of the creation of the GGNRA (H.R. Rep. No. 1391, 92nd Congress, 2nd Session, 1972) provided the following additional guidelines for the GGNRA (emphasis added):

? "This legislation will ... [establish] a new national urban recreation area which will concentrate on serving the outdoor recreation needs of the people of the metropolitan area." ? "Action is required if ... the relatively natural areas within the city are to be available to satisfy the growing need for outdoor recreational opportunities." ? "The objective of H.R. 16444 is to assure the preservation of open spaces presently prevailing within the proposed recreation area, to provide public access along the waterfront, and to expand to the maximum extent possible the outdoor recreation opportunities available to the region."

Dog walking was specifically enumerated in the legislative history of the GGNRA's creation, along with sunbathing, picnicking, horse riding, hiking, and fishing. During Congressional hearings on the GGNRA, a letter from a seven-year-old San Franciscan was read:

"Dear Congressman Roy Taylor: I want a park so I can play in the park and my sister wants a park to and so my dog can play with another dogs and my Mom wants a park so she could take my dog out to play. I hope you will make a park. Elizabeth Linke" (Hearings before the Subcommittee on

Interior and Insular Affairs, House of Representatives, pg. 414).

This letter clearly referred to off-leash dog play since it is difficult for dogs to play with one another while on-leash. In addition, dog walking was identified as a recreational activity in the House Subcommittee report on the GGNRA statute:

"On a nice day, it will satisfy the interests of those who choose to fly kites, sunbathe, walk their dogs, or just idly watch the action along the bay." (House Report No. 92-1391, pg. 7) Note that the DEIS continues to misrepresent the history of dog walking and the 1979 Pet Policy. The DEIS continues the GGNRA's false claims that the 1979 Pet Policy was never legal. On page 5, the DEIS says:

...for more than 20 years, the park erroneously implemented the 1979 Pet Policy in contravention of Service-wide regulations.

However, Judge William Alsup, in his June 2, 2005 ruling in an appeal of a challenge to tickets received by three dog walkers for having dogs off-leash at Crissy Field, said:

In sum, for more than twenty years, the GGNRA officially designated at least seven sites for off-leash use. This was not accidental. It was a carefully articulated, often studied, promulgation. The responsible GGNRA officials in 1978 and thereafter presumably believed they were acting lawfully. Even now, the government concedes that the GGNRA had full authority at all times to relax the general leash rule at the GGNRA but argues it could have done so, at least after 1983, only via a "special regulation." In other words, the agency allegedly used the "wrong" procedure back in 1978 (and thereafter) even though a "right" procedure to reach the desired result was available and could have been used. The government has not revealed its internal justification for following the "wrong" process. Whatever it was, the justification was abandoned in 2002 with the two-word explanation that it had been "in error." With this ipse dixit, the NPS wiped away two decades of policy, practice, promulgations, and promises to the public. (Case Number: CR04-00408 WHA, p. 5)

True enough, the procedural requirements for a special regulation were not followed in 1978. Trouble is, when the off-leash areas were designated in 1978, a different and earlier set of NPS regulations applied, not the later revamped rules. See 26 C.F.R. Parts 1-7 (1978) Although the earlier regime still prohibited off-leash dogs as a general matter, there was nothing then that restricted the local authority of each superintendent to make activity designations on a park-by-park basis contradicting the national regulations. That restriction came later in 1983 ' when Section 1.5 (Closures and Public Use Limits) itself was introduced, among other changes. The 1983 change

cautioned that, going forward, the use-designation provision of the new Section 1.5 should not be invoked to circumvent a general regulation. 48 Fed. Reg. at 30262 (col 1). In the period leading up to the 1983 amendment, therefore, we must presume that the GGNRA designations were lawful. (The government has not shown otherwise.) Nothing in the 1983 regulations set aside then-extant use designations. (Case Number: CR04-00408 WHA, p.'7)

Based on Judge Alsup's decision, the statement on page 5 of the DEIS is incorrect. It must be changed.

Another misrepresentation of the history of the 1979 Pet Policy is on page 6 of the DEIS: In a public meeting in January 2001, the [GGNRA Citizens' Advisory] Commission acknowledged that the voice-control policy was contrary to 36 C.F.R. 2.15(a)(2), prohibiting off-leash dogs in national parks, and therefore illegal and unenforceable.

However the official transcript of the GGNRA Citizens' Advisory Commission January 23, 2001 meeting makes it clear that while CAC Chairman Richard Bartke did say this, the Commission itself took no position on the matter, and indeed took no action on the issue. The description of the meeting in the DEIS on page 6 must be changed to reflect the truth.

In the enabling legislation, recreation is listed as one of four values to be protected and maintained, along with natural, historic, and scenic values. Given the importance of recreation to the enabling legislation and the mandate that created the GGNRA, the DEIS should have analyzed the impact of all alternatives on recreation including off-leash recreation. Because it did not, the analysis of the alternatives in the DEIS cannot be accepted.

Indeed, the DEIS assumes that recreation is, by definition, bad. It does not acknowledge the balance between natural, recreational, scenic, and historic values that, according to its enabling legislation, any GGNRA management plan must consider. The DEIS made no attempt to identify, study, or report on any benefits of recreation. This lack must be addressed. The DEIS pits recreation against natural values, rather than exploring a number of reasonable alternatives where the two can work together. This bias against the very concept of recreation calls into question the analysis of the alternatives that was based on it. Therefore the analysis of alternatives cannot be accepted.

NEPA rules require that agencies consider impacts on recreation. This is especially crucial in the GGNRA because its location in the middle of an urban setting means that GGNRA lands serve as residents' backyards. Most of us who live in San Francisco do not have yards, and we rely on park open

space for our recreational needs. The GGNRA is where people in San Francisco, and indeed in the entire Bay Area, come to play. For example, the only beaches available to the people in San Francisco are controlled by the GGNRA. Removing recreation from the GGNRA will have a significant negative impact on the quality of life of the people of the Bay Area, and that impact must be considered in the DEIS. The fact that it is not means that the analysis of alternatives in the DEIS cannot be accepted.

The DEIS should have a separate section about recreation and impacts of all alternatives on recreation both on-site and off-site. The section should identify and quantify the recreational uses of GGNRA lands at each site, and also in the surrounding communities. Impacts to recreation resources would be considered significant if they result in a decline in the quality of existing recreational opportunities or in the quantity of available recreational lands/facilities. This section should also consider the cumulative effects of loss of recreational opportunities and access at all sites under discussion. It must also consider impacts of future actions by surrounding communities that would affect on- and off-leash dog walking. For example, the San Francisco Recreation and Park Dept's Natural Areas Program Draft Management Plan calls for the closure of 15% of currently available off-leash areas in city parks. This loss of off-leash access will be significantly amplified by and will significantly amplify reductions in off-leash access in the GGNRA. The GGNRA does not exist in a vacuum. It must consider impacts of its actions on city parks and actions of city agencies on it.

IMPACTS ON CITY PARKS

NEPA law requires agencies to consider impacts on surrounding communities. For example, an NPS DEIS for snowmobile use in Yellowstone National Park, issued in May 2011, considers impacts on the economy of local communities and small businesses if winter visitors stop coming because they cannot use snowmobiles in the park. That's the way things are supposed to be done.

The GGNRA DEIS, however, says, on page 22: "the quality of urban areas is not a significant factor in determining a dog management plan." In direct contradiction to that quote, the SF Charter states as a fundamental purpose of the GGNRA: "to improve the quality of urban life." The DEIS does not explain why, given this management mandate, the DEIS does not have to consider quality of urban areas. NEPA law (40 C.F.R. 1502.16) requires that an analysis of impacts on urban quality must be a part of a DEIS. Since that analysis was not done, the analysis of the alternatives that was done in this DEIS cannot be accepted.

The GGNRA DEIS made no effort to analyze potential impacts on neighboring parks if recreational dog walkers are forced out of GGNRA

sites by the action alternatives. The DEIS repeatedly says: "An increase in nearby parks is not likely..." when considering impacts of the action alternatives. There is no evidence given to support these assertions of no impact. The DEIS made no attempt to quantify how many dog walkers will be displaced by closures of so much off-leash access. For example, the Preferred Alternative for Fort Funston will significantly reduce off-leash access. All the people who currently walk with their dogs at Fort Funston will not fit into the remaining off-leash space. Yet the DEIS claims "an increase in visitation in nearby parks is not likely" if nearly all off-leash access is lost at Fort Funston. This seemingly absurd claim must be supported by evidence. Because there is no evidence to support the claim of no impact, the analysis of the alternatives cannot be accepted.

Tsunami Friday provided evidence to contradict this dubious assumption. As reported on the front page of the March 2011 West Portal Monthly, the GGNRA closed both Fort Funston and Ocean Beach the morning of Friday, March 11, 2011 because of concerns that a tsunami from the Japanese earthquake might hit the coast. On a busy weekend day, the maximum number of dogs at Stern Grove, the closest off-leash area to the beaches, would be about 60. Weekday mornings, like that Friday, would normally find far fewer dogs in Stern Grove. On Tsunami Friday, a Recreation and Park Dept staffer counted over 200 dogs in Stern Grove at 10 am. Parking was described as "chaotic." It is likely that closing such significant amounts of off-leash areas in the GGNRA as is proposed in the Preferred Alternative will inevitably lead to a significant increase in people with dogs in the much smaller city parks. Yet the DEIS does not consider this possible impact (while touting equally dubious and unsubstantiated possible impacts by dogs on the natural environment as a reason to kick people with dogs out of nearly all of the GGNRA). Because the impact of all alternatives on city parks was not considered in the DEIS, its analysis of the alternatives cannot be accepted.

Indeed, the DEIS is not consistent on potential impacts on city parks when considering different issues at the same site. For example, on page 1311, the DEIS says, while discussing potential impacts on lessingia at Fort Funston, that Preferred Alternative (C) "may cause some of the dog walkers to visit other locations." Yet when discussing potential impacts on visitor experience in nearby parks, on page 1530, the DEIS says of the exact same Preferred Alternative (C) at Fort Funston, that "an increase in visitation in nearby parks is not likely." This is just one example of contradictory claims of impacts, all of which must be carefully scrutinized and made consistent, and be based on documented evidence of impacts by dogs.

The DEIS must quantify how many people typically visit each site in the GGNRA, how many people can be accommodated in the areas remaining open to off-leash dog walking under each alternative, and how many people

will be forced to go elsewhere under each alternative. This was not done and must be added.

The DEIS also made no attempt to find out where people will go if they are kicked out of GGNRA sites. In sections on Fort Funston, for example, the DEIS states that the nearest off-leash area to Fort Funston is at Lake Merced. However, had they done even a little research, they would have found out that the SF Recreation and Park Dept's Natural Areas Program is calling for the closure of the Lake Merced off-leash area. In addition, the only way to access the Lake Merced off-leash area is after a long walk along a busy, dangerous street. Not the kind of place that people used to walking at Fort Funston are likely to want to use, even if it were not slated to be closed.

Nearly 80% of all off-leash acres in San Francisco city parks are located either adjacent to or within one of the Recreation and Park Dept's Natural Areas Program sites (NAP Draft Management Plan). Sending thousands of additional dog walkers into these much smaller city park areas will likely cause an increase in impacts on these sensitive habitats. Yet there is no discussion or even acknowledgement that such impacts are possible. The DEIS is written as if the GGNRA is not located immediately adjacent to (and within) a major city. To assume management decisions in the GGNRA will have no impact on the surrounding city parks is laughable. An analysis of impacts on city parks is a critically important part of any comparison of impacts from various alternatives. The fact that this was not included means that the analysis of alternatives in the DEIS cannot be accepted.

It is not enough to merely state that there are "27 parks with dog use areas within about a 10 mile radius" of a GGNRA site, as the DEIS does at almost every "Indirect Impacts on Adjacent Parks" section in the entire document. The DEIS should indicate conditions in those dog use areas (no grass, mud puddle in the winter, etc.), their size, availability of parking, and their current usage levels and other baseline information, all of which will influence whether people with dogs will use them if access is restricted in the GGNRA. If people cannot use city dog areas to replace areas lost in the GGNRA, then those restrictions will have significantly greater impacts on people, and those additional impacts must be considered. Because there is none of this information in the DEIS, the analysis of alternatives cannot be accepted.

IMPACTS ON HUMAN HEALTH AND SOCIAL COMMUNITIES

The GGNRA is required by NEPA to consider impacts on humans, including on human health and social community in a DEIS.

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

environment. (see the definition of effects (1508.8).) 40 CFR 1508.14

? Effects and impacts as used in these regulations are synonymous. Effects includes ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. 40 CFR 1508.8 (emphasis added)

Yet this DEIS contains no mention of impacts on the health or social community of people who currently walk with their dogs if access to the GGNRA is severely restricted. Therefore, the analysis of alternatives cannot be accepted.

Information on the health benefits of dogs is easy to find. A pamphlet "Health Benefits of Companion Animals" (available online at the "Pets Are Wonderful Support" website (PAWS is a SF-based nonprofit): <http://www.pawssf.org/document.doc?id=15>) outlines the myriad of health benefits of having pets (and cites literature references for every benefit listed):

? Increased survival time after myocardial infarction for dog owners ?
Decreased heart rate from petting a dog ? Greater reduction of cardiovascular stress response in the presence of a dog in comparison to friends and spouses ? Enhanced hormone levels of dopamine and endorphins associated with happiness and well-being and decreased levels of cortisol, a stress hormone, following a quiet 30-minute session of interacting with a dog ? A significant reduction in minor health problems for at least 10 months after acquiring a dog ? Fewer doctor visits per year for elderly dog owners than for non-dog owners ? In bereaved elderly subjects with few social confidants, pet ownership and strong attachment were associated with less depression ? The mere presence of animals positively alters children's attitudes about themselves and increases their ability to relate to others ? Pets help children develop in various areas including love, attachment, and comfort; sensorimotor and nonverbal learning; responsibility, nurturance, and competence; learning about the life cycle; therapeutic benefits; and nurturing humanness, ecological awareness, and ethical responsibilities ? [E]lderly people who live in mobile homes and walk their dogs in the area had more conversations focused in the present rather than in the past than those people who walked without their dogs ? Disabled individuals in wheelchairs accompanied by service dogs during shopping trips received a median of eight friendly approaches from strangers, versus only one approach on trips without a dog

There are a number of additional health benefits specifically associated with walking dogs, as people currently do in the GGNRA. A study of 5,902 adults in Michigan (Reeves, Rafferty, et al, March 2010, Journal of Physical

Activity and Health, vol 8, issue 3) found that dog walkers were 69% more likely to engage in long-term physical activity than non-dog walkers. Among those who took their dogs for regular walks, 60% met the federal criteria for regular moderate or vigorous exercise. Only one-third of those without dogs had the same levels of exercise.

A study by Cutt, Giles-Corti, et al (American Journal of Public Health, January 2008) found that "the adjusted odds of achieving sufficient physical activity and walking were 57% and 77% higher among dog owners compared with those not owning dogs." Several other studies were cited in an article in the March 14, 2011 edition of The New York Times. One study of 41,500 Californians found that people with dogs were 60% more likely to walk for leisure than those who owned cats or had no pet at all. In another study quoted in the article, seniors in an assisted- living facility improved walking speed by 28% if they walked with a dog, but by only 4% if they walked with a human companion.

Walking with dogs has enormous health benefits for people, especially seniors. Yet there is no mention of these benefits in the DEIS. Nor is there any analysis of the impact that the loss of off- and on-leash space in the GGNRA proposed in the action alternatives will have on people's health. People who currently walk long distances in the GGNRA with their dogs will lose that ability if large areas currently open are closed to them. Walking on sidewalks on city streets or in the much smaller off-leash areas in city parks will not and cannot provide the same visitor experience that dog walkers have now in the GGNRA. It is therefore likely that people will find it harder to receive the same level of exercise outside of the GGNRA that they currently find walking their dogs in the GGNRA. The fact that these health effects were not considered in the DEIS means the analysis of the alternatives cannot be accepted.

The DEIS also makes no mention of the social communities that exist at nearly every site in the GGNRA where people walk with their dogs. Dog walkers are perhaps the most diverse group of users in the GGNRA. Go to Fort Funston and you will see kids and seniors, people with disabilities, gay and straight, every ethnic and religious group, and every socioeconomic class walking, talking, and laughing together, all united by their common love of dogs. There are few places in San Francisco where you will see so many different types of people interacting without rancor. Even city parks, which tend to be more neighborhood oriented, do not show the same level of diversity.

During Public Comment at the SF Board of Supervisors' Land Use Committee hearing on the GGNRA DEIS (4/11/11), Lisa Kiekdogerh said:

Good afternoon, Supervisors. My name is Lisa Kuekdogerh. I am disabled

and I do not have a dog. Last year I had to undergo grueling medical treatments. I am weak and even coming here to comment is an effort. I am grateful for getting the chance to speak. For both my mental and physical health, I made a point to visit Fort Funston when I could. I knew getting out of my social isolation was essential. I knew watching dogs play would bring me joy. I knew encountering the occasional extraverted dog would give me the chance to pet a dog and get a few face licks. My medical team told me I had to start walking as often as I was able. Given my physical state and being a woman, I wanted to be safe. Fort Funston with its open air format and the natural comings and goings of people and off-leash dogs was the perfect match. After not showing up at the Fort for a few days, a voice called out to me: "How ya doing? Haven't seen you lately." I was surprised and had no idea who was talking to me. She was a professional dog walker. I quickly learned there was a vibrant social community at the Fort and that I was welcomed into it. She continued to keep tabs on me, and does to this day. She has driven me to doctors' appointments and surgeries. She has become a vital part of my social support network. I have never encountered a more cohesive, caring, and self-policing community. I have met other disabled and senior folks who visit Fort Funston, and for many of the same reasons I do. One woman told me she knows if she collapses on the trail due to her health condition, as happened to her once before, she and her dog will be taken care of by the people there. Finding this community has been essential to my well being, and I don't want to see it disappear. This is the Fort Funston I have come to know and I wanted you to know about it, too.

There is no mention of this community, nor of the social (and health) benefits for people of this community in the DEIS To develop an understanding of the social communities of dog walkers that have developed in the GGNRA, staff and reviewers should read the public comment given at the April 11, 2011 meeting of the Land Use Committee of the San Francisco Board of Supervisors. This is not to submit those comments as those individuals' public comment for this NEPA process, but rather as expert opinions that can help staff and reviewers understand the social community of dog walkers, the benefits of dog walking, and the impacts of restrictions proposed in the alternatives on people and the community. The hearing can be accessed online at:

<http://sanfrancisco.granicus.com/ViewPublisher.php?view id=12> An analysis of the impacts on this social community of each of all alternatives should have been done in the DEIS. It was not, and therefore the analysis presented in the DEIS cannot be accepted.

BAD SCIENCE, MISLEADING CITATIONS, BIAS, AND LACK OF EVIDENCE

The findings of an EIS must be based on clear evidence of impacts. This DEIS is full of impacts that "might" occur or that "could" occur, but there is

no evidence presented in the DEIS that any of these impacts actually do occur in the GGNRA. You cannot base a management plan on hypothetical impacts when there is no evidence that, despite dogs being present for many decades, those same impacts have not been observed. That is just bad science. An EIS is supposed to be a site-specific technical planning document, based on hard information about actual effects. Generic background information about possible impacts, e.g., on serpentine soils, without any evidence that those impacts are actually occurring at sites in the GGNRA where people have walked dogs, is meaningless. Without site-specific information on impacts and a report of baseline conditions at each site, the analysis of alternatives as presented in the DEIS is incomplete and cannot be accepted.

Here are just a few examples of problems with the way the DEIS presents information that results in misleading and biased claims against dog walking, and incorrect and misleading analysis of impacts and alternatives:

? Wetlands ' The DEIS assumes negative impacts of dogs on wetlands, but the location of wetlands relative to the existing areas where dogs are walked is not shown. Mentioning impacts on wetlands when dogs aren't generally walked where they are is meaningless. Similarly, there is no data on how many dogs are actually observed in wetlands, or how frequently they are seen there. Is it one dog a year? 1,000? The numbers make all the difference in a site-specific analysis of impacts. Without such site-specific data, it is impossible to say that banning on- or off-leash dogs will have any positive impact on wetlands.

? Homestead Valley, Soils and Geology, p. 112 ' Analysis is based on the incorrect assumption that humans and wildlife have no impact on off-trail areas, and that all impacts can be attributed to dogs. Impacts of dogs should be evaluated realistically and in context with impacts caused by other factors such as humans. There is no clear evidence presented in the DEIS to support the assumption that imposing more rules will lead to fewer impacts. Any analysis based on this assumption but not backed by clear evidence must be removed from the DEIS.

? Alteration of Park Soils, p. 225 ' The DEIS claims that dogs and dog walkers create social trails "that become denuded of vegetation and result in increased soil compaction." There is no evidence presented that changing the rules about dogs will have any impact on creation of social trails since many are created and used by runners, hikers, and bikers without dogs. It seems likely that restrictions on hikers, runner, and bikers would be vastly more effective in preventing soil compaction on social trails than restrictions only on people with dogs, given the fact that most hikers and runners weigh at least 30 times more than most dogs and therefore cause more soil

compaction. However, there is no discussion of this in the DEIS.

? Alteration of Park Soils, p. 225 ' The third paragraph cites a Connecticut study with regard to dog waste as a source of nutrients in soil. However, the Connecticut study is not about how nutrients in dog waste can alter fertility of soils, as implied in the DEIS. The idea that dog urine would increase soil salinity significantly in areas adjacent to the ocean where salty aerosols from seawater constantly land and interact with the soil seems unlikely. But the DEIS makes no attempt to consider other factors present at the sites that could also alter soil salinity, focusing instead solely on dog urine as if it is the only possible cause of alteration. This makes it seem that dogs have a major impact, creating a bias against dog walking, when the reality may well be that the dog contribution to changes in soil salinity are minor when compared with other factors. Impacts from all causes must be studied in more detail at each site if any claim of impact is to be made.

? Assessment Methodology, pp. 291-292 ' This section says that "professional judgment" was relied upon in determining impacts, because there is a lack of site-specific scientific information on effects of dogs on soils in the GGNRA. However, NEPA law requires that agencies undertake studies to determine site-specific impacts if it is obtainable without exorbitant cost (40 C.F.R. 1502.22). These studies were not done in this DEIS, in violation of the NEPA requirements, although they could have been. The GGNRA instead took the easy way out and relied on unreliable (and biased) professional judgments of staff.

? Cumulative Impacts to Soils, pp. 292-293 ' The DEIS does not consider impacts on soils if, because of noncompliance, dog use is restricted further than in the Preferred Alternative, and therefore, dog use is concentrated into even smaller areas, both inside and outside of the GGNRA. This impact must be studied and included.

? Homestead Valley, Alternative A, pp. 301-307 ' The DEIS states: "Even though this site has low visitor use and low numbers of citations and incident reports related to dog activities, soil compaction and nutrient addition and possible erosion from dogs is assumed to be currently happening along the fire road/trails and in off-trail areas throughout the site." (emphasis added). The discussion of Alternative A, the No Action Alternative, is based on no site-specific evidence; it is based on assumptions. The evidence presented does not justify a change in management to protect soils and geology. This bias in the way the No Action Alternative is presented occurs repeatedly in the DEIS, and it must be changed to be based on site-specific evidence wherever the No Action Alternative is discussed.

? Inconsistencies within the DEIS ' In Appendix H, Fort Funston and Baker Beach are not listed as having potential habitat for the San Francisco

lessingia; potential habitat is listed in a number of San Mateo sites. But both sites are the only two considered in the impact analysis of lessingia in Chapter 4.

? Table 8 in Affected Environment ' The GGNRA Location column claims three plants exist at specific sites in the GGNRA when, in fact, they do not exist there (according to what is in the text of the DEIS). Lessingia does not occur in Fort Funston. California seablite does not occur at Crissy Field. Hickman's potentilla does not occur at Mori Point or Pedro Point. These inconsistencies should be corrected.

? Special-Status Wildlife ' The DEIS does not distinguish impacts on wildlife species by dogs from impacts by other factors that could be causing disturbances or population declines, such as loss of breeding or foraging habitat, predation by natural predators, climate change, beach width, etc. The DEIS provides no evidence that special-status species, who have been sharing space with dogs for decades, will experience any significant benefit if access for people with dogs is restricted, especially considering that these other factors will continue to operate whether dogs are present or not. Therefore, there is no support provided for conclusions that the action alternatives will provide actual benefits to wildlife populations.

? Tidewater goby, Coho salmon, steelhead trout, California red-legged frog ' Habitat for each of these species is essentially closed to dogs, although an occasional dog may be found in them. Because dog use of these habitats is not quantified, the DEIS cannot claim any impacts from current dog use/presence. Therefore, the DEIS should say that the No Action Alternative does not significantly impair natural values.

? Mission Blue Butterfly Habitat ' The DEIS provides no evidence of observed damage to the host plant for the Mission Blue Butterfly from dogs. The plants have shared space with dogs for decades, without problems. Therefore there is no reason to change the No Action Alternative.

? Wildlife Disturbances ' The DEIS does not contain any evidence to support the claim that the number of citations/warnings/incidents given for disturbances by dogs corresponds to a significant impact on wildlife. Impacts must be quantified, but the DEIS does not do that. A wildlife disturbance incident is not the kind of "high quality information" that NEPA law requires because the actual effect of that disturbance is not known. In addition, humans and natural predators also "disturb" wildlife The DEIS makes no attempt to evaluate disturbances by humans and natural predators, nor to compare actual effects of disturbances by dogs to actual effects of disturbances by people or natural predators. The DEIS simply asserts that disturbances by dogs causes unacceptable impairment of species, without

offering proof of that statement.

? Stranded marine mammals, pp. 233-234 ' The DEIS suggests banning dogs from beaches under Alternative D to "protect shorebirds and stranded marine mammals," but there is no evidence given to support the claim that dogs currently impact shorebirds and marine mammals. During Negotiated Rulemaking, representatives from the Marine Mammal Center stated that the first people to report stranded marine mammals were almost always people walking their dogs on the beach in the early mornings. They did not report any problems caused by the dogs to the mammals, and stated their preference that off-leash dog walking continue on beaches. There's no mention of this expert opinion in support of dog walking on beaches in the DEIS, another example of the bias against people with dogs that permeates the DEIS.

? The impacts in Alternatives B-E are assessed based on the assumption of compliance with regulations. However impacts in the No Action Alternative (A) are assessed assuming non-compliance with regulations. For example, at places such as Stinson Beach, Crissy Field, and Mori Point, impacts in areas where dogs are required to be leashed are assessed based on the assumption that dogs will be off-leash and non-compliant in those areas. Yet for the action alternatives, impacts in areas where dogs are required to be leashed are assessed based on the assumption of compliance and therefore are deemed to be reduced, even though the leash regulation is identical in all alternatives. In this case, all Alternatives have the same dog management strategy (leashed), and therefore any impacts should be the same. But they are not. Clearly, the No Action Alternative was not analyzed the same way the action alternatives were analyzed, and therefore the DEIS overstates impacts from the No Action Alternative. This imbalance must be changed everywhere it occurs.

? The DEIS says on page 290 that visitation has remained constant for the past 20 years and is expected to remain constant for the next 20 years. There has not been an increase in visitation over the past 20 years, nor is there expected to be a significant increase in visitation in the future. However, on page 5, in an attempt to explain the need for changing the dog management plan says that overall use of GGNRA sites has increased since the 1990s. These two statements are inconsistent.

? NEPA law states that the significance of an impact must take into consideration both context and intensity (40 C.F.R. 1508.27). Because current conditions at each specific site have not been reported in the DEIS, it is not possible to determine either context or intensity. Therefore it is not possible, to say that the preferred alternative will result in a quantifiable change in conditions compared to the No Action Alternative.

? Biased research, page 797 ' The DEIS quotes a study by Shulzitski and Russell (2004) to support restrictions on access for people with dogs. However this study compared wildlife in a restricted area where native plant vegetation had been restored to an unrestricted area at Fort Funston that had not had any new vegetation planted. Wildlife was reported to be more abundant in the restored area, but there is no evidence to suggest that restricting dogs caused the increase. It was more likely due to the replanted vegetation. The study also cites a dog barking at a fox, adding that the fox's behavior was unchanged. This indicates wildlife at Fort Funston has acclimated to the presence of dogs there, and therefore dogs are not causing major impacts on wildlife there. This study cannot be used to justify restricting access to people with dogs.

? Fort Funston soil chemistry, page 414 ' The DEIS says: "Nutrient addition to soils is at high levels at this site due to the high number of dogs at the site. Major impacts on soil chemistry would be expected at this site due to nutrient input from dog waste and urine." However there is no evidence presented to support this claim of major impacts on soil chemistry, despite the fact that dogs have been at Fort Funston for decades and such major impacts should be easy to detect. During Negotiated Rulemaking, GGNRA staff were repeatedly asked for evidence to support this claim. No evidence was presented then, and there's no evidence presented now. Clearly there is no such evidence. This claim should be removed wherever it occurs.

? Bacterial contamination off Ocean Beach, page 461 ' The DEIS says: "A substudy of the San Francisco Sewage Master Plan determined that bacterial contamination of waters off Ocean Beach was significant due to dog waste deposited along the shoreline (NPS 1999, 21)." The reference cited has is not a substudy of the SF Sewage Master Plan (it is instead Natural Resources Section, Resources Management Plan, GGNRA, December 1999). During Negotiated Rulemaking, SFPUC's representative challenged the GGNRA's claim of dog waste contamination at Ocean Beach. GGNRA staff replied that they asked the SFPUC Water Quality Bureau and were told the SFPUC was not aware of any such study. Yet the GGNRA continues to make this claim of bacterial contamination from dog poop at Ocean Beach. SFPUC monitoring data easily available from the SFPUC's website indicates that Ocean Beach is extraordinarily clean, while the count at "no dogs" beaches such as Aquatic Park and Baker Beach at the Lobos Creek outlet have very high bacterial counts. Clearly dogs have nothing to do with bacterial counts in the ocean. Indeed, the San Francisco Chronicle on May 26, 2011 reports that the environmental group Heal the Bay gave Ocean Beach a perfect score for water quality. The DEIS statement is wrong and contributes to a bias against dog walkers. Without any evidence bacterial contamination in water at beaches from dogs is even really an issue, discussion of it must be removed from the DEIS.

Although these are specific examples, the issues raised in each bullet point occur repeatedly throughout the DEIS. They must be corrected and changed everywhere they occur in the DEIS, not just at these few isolated instances.

The basic assumption throughout the DEIS is that the mere presence of dogs equals impaired natural resources. But no evidence is given for this broad generalization. Because this basic assumption is not proven, the analysis that assumes it to be true cannot be accepted. When the sum total of all these problems outlined above are taken into account, it is clear that the DEIS is riddled with poor science, and with claims of impacts and assumptions that are not supported by any data. Basically, the entire impacts section must be thrown out and completely rewritten, to ensure this DEIS is the science-based document that it is supposed to be. In addition, the entire alternatives analysis section must also be thrown out and completely rewritten because it is based on the fatally flawed impact analysis. The DEIS is so flawed it cannot be fixed. It must be completely redone.

THE SPECIAL CASE OF THE SNOWY PLOVER

The presence of the Western Snowy Plover at Ocean Beach and Crissy Field has been used to justify banning dogs from large sections of the beach at both areas. However, the DEIS does not provide evidence to support this restriction. There is no evidence provided in the DEIS to support the claim that dogs chasing the plovers has an impact on the survival of the species. There is no correlation between numbers of plovers and whether dogs were on- or off-leash on the beaches. Indeed, some of the highest numbers of plovers recorded have been when dogs were off-leash (1994 had the highest recorded numbers of plovers (54), at a time when there were no restrictions on dogs on Ocean Beach). Even Hatch (1996) says: "Factors other than the number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach."

According to the DEIS, the presence of dogs on the beach has not prevented the snowy plovers from using their preferred resting places at Crissy Field. The snowy plover section of Chapter 3 (page 253) states that, since monitoring began in 1996, the birds have continued to use the same two resting areas, whether dogs were on or off-leash on the beach or not. There is no evidence dogs have any impact on plover population numbers. There is no evidence that plover populations will experience any significant benefits from the Preferred Alternative compared to the No Action Alternative. Monitoring surveys from 1994 to 2006 observed a total of 48 off-leash dogs chasing plovers. Given the fact that there are millions of visits by dogs to Ocean Beach every year, this is a minuscule amount. Similarly, Hatch (1996) studied 5,692 dogs at Ocean Beach, and observed 19 that chased plovers; 1/3 of 1% of the dogs observed chased plovers. There is no evidence in the DEIS that a dog has ever caught or harmed a plover. There is also no

evidence that these chasing incidents had any impacts on the plover populations.

There is no evidence cited in the DEIS that dogs adversely affect the roosting or foraging behavior of the plovers. Hatch (1996) makes the claim that: "Disturbance [of plovers by dogs] results in lost energy intake due to reduced foraging and feeding efficiency, and increased energy expenditure as a result of fleeing from disturbance." The very next sentence is "Little research has been conducted on the energetic expenditure as a result of fleeing from disturbance." This is another case of assumptions of impacts without any hard evidence that the impact actually occurs.

One study that did test this assumption was done by Megan Warren, as part of a Senior Research Seminar at UC Berkeley ("Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover", UC Berkeley Environmental Sciences 196, Senior Research Seminar, May 7, 2007). In her report, Warren studied whether recreational disturbances changed the feeding behavior of the snowy plover at Crissy Field and two sites at Point Reyes. She admits that she had expected the data to show that as the frequency of disturbance increased, the birds would spend less time actively foraging and more time alert. Instead, she found no significant relationship between feeding behavior and direct disturbance by people recreating on the beach. "The Crissy Field study did not provide any relevant results, however, the data from the two Point Reyes study sites do not support the hypothesis that western snowy plovers in more heavily disturbed areas devote less time to actively foraging and more time to being alert." (emphasis added) Interestingly, the Warren study is not mentioned in the DEIS.

Again, the DEIS has to consider "disturbances" of plovers by dogs in the context of other causes of disturbances, from people walking in the dunes, joggers, natural predators, equestrians, special events like Fleet Week and the Fourth of July that draw hundreds of thousands of people to the GGNRA, and surfers. The April 2011 edition of the West Portal Monthly quotes Dan Murphy, a plover counter and local plover expert from the Golden Gate Chapter of the Audubon Society as saying, "Ocean Beach isn't really suitable for nesting [of plovers]. Not only is it overrun with people and dogs, it's loaded with predators." He continues, "There are typically between 15 and maybe 40 ravens in the plover protection area at any given time. There are additional birds that come and go during the day. Then there are the other predators that use the beach, mostly at night. In other words, there are way too many predators and disturbances to suggest Ocean Beach is a likely spot for successful plover nesting."

Disturbances from dogs cannot be considered in isolation, as if dogs are the only source of disturbances for the plovers (as the DEIS analysis assumes).

The analysis based on this assumption cannot be accepted.

Mitigations already exist to address the small numbers of dogs who chase plovers' citations to their owners. There is no need for additional actions, and especially no need to ban dogs from 2/3 of Ocean Beach or from the western end of Crissy Field. Actions as drastic as bans must be supported by solid scientific evidence, not assumptions about possible impacts. Indeed, this lack of evidence of impacts means that there is also no justification for the seasonal restrictions on dog access on Ocean Beach and Crissy Field. These restrictions should be removed.

Note that on page 252, the DEIS says: "In September of 2005, the USFWS published a Final Rule to re-designate critical habitat for the western snowy plover along the coasts of California, Oregon, and Washington (20 CFR Part 17)." The clear implication of this sentence is that the GGNRA contains federally designated critical habitat for the plover. The reality is that USFWS has refused to designate any land in the GGNRA as critical habitat for the snowy plover. USFWS continued to refuse to designate any critical plover habitat in the GGNRA in a 2011 proposal that doubled the acres of critical habitat on the west coast. The fact that there is no critical habitat for plovers in the GGNRA should be explicitly stated in this paragraph.

THE SPECIAL CASE OF THE BANK SWALLOWS

The DEIS claims (table on page 1265) that under the No Action Alternative (allowing off-leash throughout Fort Funston, except for the closed area) "continuing impacts from dogs and/or humans would include digging at or collapsing the burrows, flushing birds from nests, and causing active sloughing and landslides that may block or crush burrows with the young inside." The DEIS cites two studies for its claims of these impacts. However, neither study documents any impact from dogs on bank swallows. One study cited, USGS 2004, does not actually report any dogs in the bank swallow protected area (in this report, dogs are reported to be in a different area closed for native plant restoration).

In the other study, NPS 2007e, monitors reported that a few dogs (a total of three from 2001 to 2006) were observed in the closed area around the bank swallows. These few dogs were not observed to cause any problems for the bank swallows. A list of "potential impacts" is given at the end of NPS 2007e, including digging and collapsing burrows, flushing of birds, and landslides. But this is not a list of observed events. These "potential impacts" in NPS 2007e somehow were reported in the DEIS (page 1263) as: "Dogs could likely dig at or collapse burrows..." and in the table on page 1265 as "continuing impacts". There is no explanation of how things that could "potentially" happen became "likely" to happen, and then two pages later, became a "continuing impact." Note that no one has ever seen a dog collapse

a bank swallow burrow, flush a swallow, or cause a landslide in the bank swallow colony at Fort Funston. Nola Chow, a GGNRA researcher who monitored the bank swallow colony in 1994 and 1995, wrote an official report of her work (1994-95 Bank Swallow Annual Report, 1996). In it, she observed that dogs were present in areas around the bank swallow, but noted that they did not disturb the swallows. Her observations of no impact are not reported in either the DEIS or in NPS 2007e.

Given the lack of evidence of impacts, the presence of bank swallows at Fort Funston cannot be used to justify any restrictions on access for people with dogs, whether on the bluffs or on the beach. There is no evidence in the DEIS that the action alternatives would have any beneficial impact on the bank swallows compared to the No Action Alternative. The analysis of alternatives that does not acknowledge this cannot be accepted.

Correspondence ID: 4443 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: SAFETY ISSUES

The DEIS says (page 5) that: "Since the 1990s... the number of conflicts between park users with and without dogs began to rise, as did the fear of dogs and dogs bites or attacks." The clear implication is that there has been an increase in incidents involving dogs, and this is used to justify restrictions on access to GGNRA lands for people with dogs.

However, there is no evidence in the DEIS to indicate that dogs are a major safety threat. Appendix G lists Pet Related Incidents throughout the GGNRA for 2007 and 2008. There is no reason given for why the DEIS only shows incidents from those two years. Because Appendix G contains only numbers of incidents, there is no context for what actually happened ' where did the incident occur? What actually happened? How serious was it? There is no site-specific information provided to indicate where, if anywhere, safety might be a problem.

Even without knowing the details, it is clear that there aren't many incidents involving dogs. In 2008, Appendix G cites 16 dog bite reports out of the millions of visits by dogs to the GGNRA every year. The number for 2007 was 37. The total number of warnings, citations, and reports involving dogs totaled 889 for 2008 and 1535 for 2007, which represent a small fraction of the millions of visits by dogs every year. Given these small numbers of problems, there is no evidence that the action alternatives would have any more beneficial impact on safety than the No Action Alternative. Analysis that assumes a difference in safety among the alternatives cannot be

accepted.

Should problems occur, law enforcement can deal with them without needing to severely restrict access for people with the hundreds of thousands of dogs that do not cause any problems. At DEIS Open Houses, GGNRA staff have said that NPS law enforcement is not set up to handle issues with aggressive dogs. The San Francisco Police Department has a Vicious and Dangerous Dog Unit that investigates allegations of aggressive dogs and dog bites, and holds hearings at which evidence is presented. The Hearing Officer can order a dog to be muzzled when in public, or order its owners to work with a trainer to learn how to control the dog, or, in the most serious cases, order the dog to be euthanized. If the NPS is not set up to deal with issues involving aggressive dogs, perhaps any dog that is accused of biting or attacking a person or other dog in the GGNRA could be referred to the SFPD's Vicious and Dangerous Dog Unit. There is precedent in that juveniles who commit crimes in the GGNRA are referred to the San Francisco Juvenile Justice system. Treat people with aggressive dogs the same way ' refer them to the SFPD Vicious and Dangerous Dog Unit.

Given that Appendix G only includes data for two years, is there any evidence that there has been an increase in incidents involving dogs, as page 5 implies? During Negotiated Rulemaking, the GGNRA provided participants with incident and citation reports from 2001 to 2006. Analysis of this data (which was not included in the DEIS) shows that the numbers of incidents and citations are quite similar to those in 2007 and 2008. For example, the numbers of dog bite incidents from 2001 to 2006 were 26, 26, 23, 29, 23, and 24, respectively. These numbers are very similar to those in 2007 and 2008. There was no increase in dog bites in the GGNRA. While there appears to be an increase in total number of incidents in 2007 and 2008, the vast majority of them are leash law violations. There is no evidence given that leash law violations have any impact on safety for either people or birds and wildlife (see the discussions of the snowy plover and bank swallows above).

The DEIS does not include any context for the incidents enumerated in Appendix G. There is no information about how incidents involving dogs compare to non-dog related incidents. Without this context, it is impossible to compare the benefits of different alternatives. The data from 2001 to 2006 makes it clear that people without dogs cause significantly more problems than dogs do. The data is presented graphically below.

Clearly people without dogs represent the major safety problem in the GGNRA, not dogs.

ENVIRONMENTAL JUSTICE

The DEIS cites the need to restrict access for people with dogs because of concerns about environmental justice. On page 19, the DEIS says: "Minority or low-income populations may be more negatively affected by off-leash dog walking than Caucasian, middle-income, or high-income populations." To support this claim, the DEIS says (page 31): "In a study conducted by San Francisco State University in 2007 on ethnic minority visitor use experience at GGNRA, research found that dogs were a problem mentioned by all Latino and Asian groups (Roberts 2007, iii). Research found that these minority groups mentioned dogs, especially dog waste, as a barrier to park visitation, and overall, Latinos were the most concerned with dog owners' lack of concern or control of their dogs (Roberts 2007, iii)."

The Roberts study was not "on ethnic minority visitor use experience at GGNRA." It was a series of focus groups of a small group of non-randomly selected members of various minority groups intended to "realize the park goals of understanding how to improve 'connecting people to the parks' and how best to engage under-represented communities in plans and programs." The focus groups totaled less than 100 people, who were largely unfamiliar with the GGNRA (only 1/3 had visited at least one GGNRA site in the past year). There is nothing in the report to indicate how common a comment was ' did only one person say it, or was it mentioned repeatedly. Thus the focus groups' opinions reflect only the opinions of the people who participated and cannot be extended to indicate opinions shared by all members of the minority groups represented. Yet that is what the DEIS does with the Roberts study.

While dogs were mentioned, it is a misrepresentation of the study to claim dogs were a major factor keeping minorities out of the GGNRA. A major concern expressed was that there are not enough minorities represented in NPS staff. Common barriers to coming to the GGNRA included the lack of mass transit to get to the GGNRA, and fear of unknown plants and wildlife behavior. When asked to describe why they think San Francisco parks have become less safe, African Americans in the focus groups expressed concerns about finding used drug paraphernalia on the beaches, the danger of pedophiles/sexual predators at the park, and aggressive panhandling. Asians and Hispanics expressed concerns about cleanliness, defined as unclean bathrooms and dog feces. While Hispanics in the focus group did mention dogs as a constraint to park enjoyment, they also mentioned concern for personal safety, lack of mass transit, and fear of crime (fear of being raped, witnessing drug use, the presence of homeless people, and observing fights ' "it is only safe if enough people are around"). Asians similarly mentioned dirty bathrooms and dog feces in the same context as a barrier for access to parks. Two focus groups of Asians reported dislike for "dog owners [who] do not clean up after their pets," but also for trails not being well kept.

Out of the more than 30 recommendations at the end of the study, there is no

mention of dogs. While dogs were mentioned in the focus groups, it is by no means the indictment of dogs ' if only there were no dogs, Asians and Latinos would visit the GGNRA ' that is implied in the DEIS. The reference to this study should be removed from the DEIS. At the very least, an accurate description of the focus groups and what the report does and does not do must be included, so it can be understood in an appropriate context.

The DEIS contains no information on the ethnic makeup of people who do visit the GGNRA. Dog walkers are perhaps the most diverse group of park users in the GGNRA. Go out to Fort Funston or Crissy Field and you will see kids, seniors, people with disabilities, gay and straight, all ethnic groups, people from all religions and countries, and people from every social and economic class walking with their dogs. The restrictions on off-leash access in the action alternatives will have a serious negative impact on the thousands of ethnic minorities who currently walk with dogs in the GGNRA. This impact is not addressed in the DEIS. Analysis of alternatives that does not consider this impact cannot be accepted.

The DEIS also does not address the impact of the severe restrictions on off-leash access proposed in the action alternatives (and especially the Preferred Alternative) on people with disabilities who currently walk with their dogs in the GGNRA. For example, the part of the Sunset Trail, the only paved trail at Fort Funston that goes away from the parking lot, is designated as "no dogs" in the Preferred Alternative. People with mobility issues will be restricted to the parking lot, since there will be no way for them to walk long distances through the sand dunes to reach those parts of the paved trail farther north that are designated on-leash. Analysis of alternatives that does not address impacts on people with disabilities who currently walk their dogs in the GGNRA cannot be accepted.

THE COMPLIANCE-BASED MANAGEMENT STRATEGY

The Compliance-Based Management Strategy (CBMS) must be abandoned and removed from the DEIS. This strategy, which ratchets up leash restrictions in areas if the GGNRA claims there is not enough compliance with them, is designed to (page 63): "encourage compliance with sections of the Code of Federal Regulations (CFR) applicable to dog management, and ensure protection of park resources, visitors, and staff. It will provide the framework for monitoring and recording observed noncompliance with the applicable sections of the CFR, including the new 36 CFR Part 7 special regulation, and will guide use of park resources to address those violations."

There is no explanation of how the CBMS will encourage compliance with sections of the CFR applicable to dog management. What sections would that be? The DEIS does not say. There is no explanation of how the CBMS will "ensure protection of park resources, visitors, and staff?" The CBMS

will look at compliance, and only compliance, to determine whether or not to change an off-leash areas to on-leash, or to ban dogs from an on-leash area. There is no attempt to determine whether or not the non-compliance actually causes any impacts on park resources, visitors, or staff. As in the impacts and analysis sections of the DEIS, there is an assumption that non-compliance equals impact and impairment of resources. But there is no evidence presented in the DEIS that this equation is true. There is no evidence that CBMS will have any beneficial impact on park resources, visitors, or staff, and especially no evidence that it will be any more beneficial to any of them than the No Action Alternative without a CBMS.

The description on page 63 indicates CBMS will provide the framework for monitoring and recording observed non-compliance. That implies the DEIS contains information on how the monitoring and recording will be done. But there is absolutely no information in the DEIS about how the monitoring will be done. Who will do it? Will GGNRA staff who have demonstrated a repeated and long-standing bias against dogs do the monitoring? Will they be teaching volunteers how to do it? Will those volunteers be from groups who oppose dogs in the GGNRA such as Golden Gate Audubon? Will the GGNRA install surveillance cameras in areas with high dog use? There is nothing in the DEIS to prevent that. When asked about surveillance cameras, GGNRA staff answered that they were not specifically listed in the DEIS, but they did not rule out their use. Without a full description of exactly how this monitoring and recording of non-compliance will be done, there is no way for anyone to know whether or not the CBMS will be a problem or not, whether it is worth opposing or not. This denies people the ability to comment intelligently on the CBMS, and, therefore it must be removed.

In a fuller description of the CBMS process elsewhere in the DEIS (e.g., page 802 and 1116), it is clear that changes in leash status will be made automatically. As two different federal judges ruled in the Crissy Field tickets case, the NPS is required by law to seek the public's input before making a management change that is either significant or highly controversial. Changing an off-leash area to on-leash, or banning dogs completely from an on-leash area would clearly be both significant and highly controversial. But CBMS will deny the public the opportunity to comment on the change when it is made. It will happen automatically. Throughout the last 20 years, the GGNRA has repeatedly made it clear that it does not want dog walking on its lands, as for example, when it unilaterally rescinded the 1979 Pet Policy that allowed off-leash dog walking on 1% of its land. When viewed within the context of that history, the CBMS seems a cynical attempt to accomplish that desired ban while being able to claim that the DEIS allowed dog walking, albeit in very small areas, and that the GGNRA was therefore responsive to the public's demand for off-leash recreation. The ability to make management changes without

public input is an illegal and fatal flaw in the CBMS and, so the CBMS must be removed from any Dog Management Plan.

Traditionally adaptive management plans do not only go one way ' if there is a documented impact, additional restrictions take place, but where there is no impact observed as a result of the new restrictions, they can be eased. The CBMS as outlined in the DEIS is one-way only. The restrictions made will be permanent, with no chance to go back to the less restrictive leash requirements if no impacts are documented. This is another fatal flaw in the CBMS, another reason it must be removed.

The GGNRA has only suggested CBMS for the dog management plan. Are other recreational users subject to the same compliance monitoring and automatic and permanent changes in management policies, especially when there is no proof of actual impacts needed? Are hang gliders, equestrians, or bicyclists subject to the same process? They are not, and the implementation of CBMS only for dogs is biased and unfair, and it cannot be allowed to remain in the DEIS.

Management plans should not come with a built-in nuclear option or poison pill. Yet that is exactly what the CBMS is. It allows a relatively few bad actors to undermine and destroy a traditional recreational use of an area that is enjoyed by hundreds of thousands of people. No number of responsible dog owners will stop what will become the inexorable removal of all off- and on-leash access in the GGNRA Millions of hours of incident-free dog walking will not matter. There should (and there are) penalties for people who allow their dogs to enter closed areas, dig, jump on people, or chase birds. The vast majority of people who do not act badly should not be penalized for the bad actions of a relative few. The CBMS is too vague, unfair, and undemocratic (it denies the public the chance to comment on changes when they are made) to be allowed to continue in the DEIS or in any GGNRA Dog Management Plan. It must be removed.

SUMMARY

It is clear that the DEIS is a fatally flawed document. It does not provide the baseline or site- specific data needed to fairly evaluate the alternatives. Unsubstantiated claims and assumptions underlie most of the analysis of the alternatives. The No Action Alternative is unfairly analyzed, with assumption of non-compliance while all action alternatives assume compliance. The DEIS assumes there are no impacts unless dogs are present, ignoring impacts from people, natural predators, and other causes, and denying the context needed to evaluate fully and fairly whether restrictions on dogs will have beneficial impacts or not. It ignores impacts on recreation, people, and the surrounding communities (especially city parks). It is full of impacts that "might" or "could" occur, but contains little,

if any, documented evidence that those impacts are actually occurring in the GGNRA. It includes the poison pill of a CBMS, which will change permanently management status in the GGNRA while denying the public the chance to comment on those changes.

GGNRA staff have demonstrated a profound bias against dog walking in the past. They cannot be the ones who evaluate the public comments submitted as part of this NEPA process. In particular, they cannot fairly evaluate criticisms of their own studies that are contained in this and other public comments. NPS must arrange for an independent review of the public comments and an independent review of how the DEIS must be changed in response to those comments.

The DEIS is so fatally flawed it cannot be fixed. The GGNRA must throw it out and start over, doing the baseline studies required of it and fairly evaluating impacts and alternatives. SFDOG encourages the development of an A+ Alternative, one that is based on the 1979 Pet Policy, and that returns the plover restriction areas to off-leash access (given the DEIS' failure to prove any impact by dogs on plover populations or survival). In addition, areas in San Mateo that were not part of the 1979 Pet Policy but where off- and on-leash recreation has traditionally occurred, such as Sweeney Ridge, must allow that off- and on-leash recreation to continue. Similarly, off- and on-leash should be considered for all areas that become part of the GGNRA in the future, such as Rancho Corral de Tierra, especially where off- and on-leash recreation have traditionally been enjoyed. Sincerely,

Sally Stephens Chair, SFDOG

Note: Comment Submitted to the GGNRA includes an Addendum: Transcript of April 11, 2011 Land Use Committee of the San Francisco Board of Supervisors hearing. cc: Sen. Dianne Feinstein, Sen. Barbara Boxer, Congresswoman Jackie Speier, Secretary of the Interior Ken Salazar, NPS Director Jon Jarvis, NPS Pacific West Regional Director Christine Lehnertz, State Sen. Leland Yee, Assemblymember Fiona Ma, San Francisco Mayor Ed Lee

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|-----------------------------|---|-----------------------|------------------------|
| Correspondence ID: | 4444 | Project: 11759 | Document: 38106 |
| Received: | May,24,2011 00:00:00 | | |
| Correspondence Type: | Letter | | |
| Correspondence: | I am writing because I am very disappointed and unhappy about the GGNRA Dog Management Plan to reduce protected dog areas in the Bay Area. Like the San Francisco Board of Supervisors, I am opposed to the plan. | | |

Fort Funston is one of the FEW places that allows dogs on beaches, and the plan is to cut this area even further? Please remember that dogs are not allowed on MOST beaches or federal land preserves. For example, dogs are only allowed on the valley floor, and not in MOST of Yosemite, including most of the hiking trails and hiking areas. There are few places for dogs to run on and off-leash. Please do not take these areas away.

I myself am a responsible dog owner, as are my friends who own dogs. We always pick up after our dogs, carry around plastic bags, and dispose of our dogs' waste appropriately. We constantly supervise our dogs, especially if they are running off-leash, to make sure they are not disturbing people or destroying habitat.

We understand you are trying to preserve a natural habitat, but our dogs run on the trails and leave only as much of a footprint as people do in Yosemite and other national parks.

Please PROTECT these designated dog areas. They are very important and should not be cut or reduced.

Sincerely,

I am a Sierra Club member & like the Audubon Society, but I oppose them on this issue. Dogs have such little protected areas as is. If you take away their space, you should add more elsewhere...

Correspondence ID: 4445 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original reason that the GGNRA was established.

This plan disregards the health and well-being of people, dogs, and the

community. It arbitrarily excludes the hundreds of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan provides no evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude biased, exaggerated, speculative, and misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Establish fair rules enabling professional dog walking.

These are my personal comments and observations regarding this plan:

I am a life member of the Sierra club, a hiker and a birder, and a member and docent at the Academy of Sciences, so I am well aware of environmental issues in our area. I am always disturbed, and I speak up when I see dog owners sending their dogs and children up the unstable cliffs at Fort Funston. I'd like to see much better signage and fencing at Fort Funston so that my dogs and I can run freely off-leash without disturbing important natural areas. As much as those other interests give meaning to my life, none comes close to the rich experiences I've had as the owner/guardian of mainly rescue dogs over the last thirty-five years. We have to strike a balance to care for the areas and species that require protection and allow our unleashed dogs their healthy exercise for the myriad ways they benefit us as companions. Let's be sensible and respect the recreational needs of us city-dwellers while monitoring the species we can perfect a clear compromise on the GGNRA plan is in order. Thank you for this opportunity to express my views.

Sincerely, Liz Rogers

ID:

Received: May,25,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Dear Mr. Dean,

I am a 50 year old Nurse Anestheist and live in Pleasant Hill with my 2 rescued, very well behaved weimaraners. I am in San Francisco a least 2-4 times a week and always take my dogs with me, especially so we can go to Fort Funston or Crissy Field. Even when I lived in the City many years ago, I always took my dogs to Fort Funston. When you live in the City, the options for letting your dog run and play off leash are very limited. When dogs don't get a chance to run, they are unstimulated and eventually get bored and destructive (and in some cases, have to be put down). Even though the East Bay has many off leash areas for dogs, I constantly have to worry about foxtails, ticks and rattlesnakes (plus it gets too hot out here in the summer to let them run around outside). Fort Funston and Crissy Field (those are the two that I frequent, but I include the other parks as well for these comments) provide a lot of serenity for me in their beauty, and in knowing that my dogs and I can have fun, get a lot of exercise, and not have to worry too much about getting hurt.

The majority of times that I am at either park I witness responsible dog handlers, and find that most of the dogs are highly socialized, allowing them to be off leash without getting into fights or not listening to commands. My dogs are always under voice control. Indeed, there are irresponsible dog owners and troublesome dogs, but I find that to be the exception rather than the rule at these parks.

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original reason that the GGNRA was established.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the hundreds of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. The GGNRA draft management plan provides no evidence to justify such drastic changes to 40

years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. Provide for extensive off and on-leash dog walking on all trails and other lands Acquired by the GGNRA since 1979, especially in San Mateo County. Exclude biased, exaggerated, speculative, and misleading statements and studies. Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

A Compliance-based Management Strategy cannot be a part of any plan. It changes the status of areas (off-leash becomes on-leash, on-leash becomes no dog) automatically and permanently if the GGNRA claims that there is not enough compliance with the new restrictions. In this case no evidence of impacts from non-compliance are necessary, only the fact that there is non-compliance. This type of strategy will potentially end off-leash access without giving people a chance to comment on the change. Also, it punishes responsible dog owners for the bad behaviors of a few irresponsible ones. It must be opposed and removed.

I trust that the GGNRA, in developing a general management plan, will take into consideration and respect the specific character and situation of the Fort Funston Area. I fully support Alternative A, the No Action alternative of the DEIS, as it relates to Fort Funston.

Respectfully,

Jean Kusz

Cc Senator Dianne einstein, Senator Barbara Boxer, Congresswoman Nancy Pelosi, Congresswoman Jackie Speier, Secretary Ken Salazaar, National Park Service (Jon Jarvis, Director, Christine Lehnertz, Pacific West Regional Director), State Senator Leland Yee, State Senator Mark Leno, Assemblymember Fiona Ma, Assemblymember Tom Ammiano, Mayor Ed Lee, Board of Supervisors

Correspondence ID: 4447 **Project:** 11759 **Document:** 38106
Received: May,25,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My husband and I are long time users of the Crissy field Recreation Area.

For years we came over from the East Bay, often with out of town visitors to enjoy the setting and the uniquely San Francisco flavor of people of all ages and ethnicities enjoying a beautiful setting. During all of those visits we never encountered any issues with the dogs and bicyclists. As long time members of Audubon and Nature Conservancy, we took note of the restoration progress. My husband is 72 years old and we also appreciated that the area was accessible to friends and family members with limited mobility.

Last year, after 30 years of marriage, we got our first dog. Now we make the trip across the bridge twice a month on average to walk Fred at Crissy field. We almost always get lunch and coffee there and usually stop to pick up some other "necessity" on our way through the city. As new dog owners, we have been particularly aware of the behavior of dogs and their owners. During the past year of regular weekday and weekend excursions to Crissy field, we have never observed an issue of dog or owners violating posted signage.

We are concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options (besides restricting dog-walking access) should be considered first.

Some specific problems with the DEIS include the following points. Please revise the DEIS to correct these errors.

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. To the contrary, it is our experience that when people use a recreation area, they care for it. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

The draft plan has the effect of punishing many people because a very small number may be uneducated, insensitive, or irresponsible. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. I wish that the DEIS would include an alternative along these lines. The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic

interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts - other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors.

The DEIS needs to provide full disclosure to the public and decision makers. If dog- related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. We have never observed problems with dogs in sensitive areas. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone - so that an informed decision can be made.

The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative.

Please choose the No Action alternative and continue the current off Leash policy. These spaces are filled with joy. The deepest needs of people are met when we gather outdoors, interacting with fellow dog lovers, savoring the spirit that is generated by enjoying dogs running, chasing, playing in the surf. This is not the enemy of conservation, it is the embodiment of the balance and cooperation necessary for quality urban environments.

Respectfully,

Debra and Russell Kirschenbaum Oakland, CA 94611-3118 cc:
Representative Nancy Pelosi 8th Congressional District of California House
Minority Leader, U.S. House of Representatives

Ken Salazar Secretary of Interior

Jon Jarvis, National Park Service Director

Crissy field Dog Group P.O. Box 475372 San francisco, CA 94147-5372

Correspondence ID: 4448 **Project:** 11759 **Document:** 38106

Received:

May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence:

Dear Superintendent Dean,

I would like to introduce myself. My name is John Barnette and I reside in the Bayview district of San Francisco. 94124 zip code. I have lived in San Francisco for nearly 14 years and have lived in several neighborhoods. I have been a dog owner/guardian for nearly all that time. One of my favorite things about San Francisco is its park system of small neighborhood parks and huge spaces such as Golden Gate Park, The Presidio, Fort Funston, and Crissy Field. I appreciate the community atmosphere and great diversity of our great city evidenced by the people and pets who utilize the spaces.

I am a Realtor in San Francisco and often discuss the benefits of the parks and recreation spaces in the various neighborhoods of the city and greater Bay Area with clients and associates. It is elemental to the liveability of our great area.

The human animal bond is very important to me. As a responsible dog guardian, I keep my dog under voice and sight control, clean up after him and keep him out of the fenced dunes and vegetative areas. It is important for my dog walking friends and me that areas like Crissy Field and Fort Funston remain open for off leash dog walking access. This is especially important for me as my dog Clyde is a large Grayhound mix that needs large spaces to run and frolic.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo and San Francisco County are not based upon sound science or long-term monitoring of site specific conditions. As a responsible dog guardian and advocate for animals, I know it is crucial that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well- behaved dog. Having places where I can take long walks with my dog allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dog and dog guardians

will not have sufficient opportunity to exercise and recreate.

The draft plan has the effect of punishing many people because a very small number are not educated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment and non-dog citizens enjoying the space.

An emphasis should be placed on education, policing irresponsible pet owners (and general public without pets), and specific protection of damaged lands, and preservation of endangered wild life in protected space. Respectfully,

John Barnette

CC: Ken Salazar, Secretary of Interior Representative Nancy Pelosi, 8th Congressional District of California Jon Jarvis, National Park Service Director

Correspondence ID: 4449 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

My name is Mike Clogan, and I live in the city of San Francisco. I am writing to you today in connection with proposed changes to canine access, outlined in the Golden Gate National Recreation Area's ("GGNRA") Draft Environmental Impact Statement ("DEIS.")

While I am not currently a dog owner, I am very concerned with the changes outlined that would limit or prohibit dog access to many GGNRA sites. I believe that the proposed changes have not fully considered all impacts from limiting or eliminating canine access to the GGNRA.

San Francisco is, obviously, a highly urban environment. Most of us do not possess yards, and, indeed, many residents live in apartment dwellings. We citizens have come to view area parks, green spaces, and beaches as communal back yards. This includes GGNRA areas such as Crissy Field, Ocean Beach, and parts of the Presidio.

The proposed changes would have a negative environmental impact upon non-GGNRA parks and sites, as dog owners would be forced to use those areas once access is limited to GGNRA areas. This would be true even if the

pertinent GGNRA area was merely limited by adding an on-leash rule, as free-spirited San Franciscans would still migrate to off-leash areas in the city and county of San Francisco. I do not believe that the DEIS adequately considers this.

I often use Ocean Beach and visit Crissy Field several times per year. I have never witnessed a problem with dog use of those areas. Indeed, because most dogs in San Francisco are, as are their owners, apartment dwellers, dogs are well socialized and behave well. Limiting access such as an on-leash rule at Crissy Field or eliminating access, as at the vast majority of Ocean Beach, will likely serve only to force out dog owners from these areas.

Indeed, the proposed DEIS fails to consider the impact of the changes upon humans, in my opinion. San Francisco has large numbers of single people, who live alone (often with pets), including many gays and lesbians, elderly persons, and retired people, often with pets. For many of these people, their dog is more than an animal possession; instead, the dog is viewed as a companion member of their family. Limiting or eliminating canine access to GGNRA sites will serve to limit or eliminate their human owners use of the affected GGNRA sites.

For the foregoing reasons, I respectfully request that the proposed changes in the DEIS not be implemented, and that canine access remains as is. Thank you for your attention to this matter.

Sincerely,

Mike Clogan Attorney at Law San Francisco, CA 94112

cc: Minority Leader Nancy Pelosi Secretary Ken Salazar Mr. Jon Jarvis

Correspondence ID: 4450 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My name is Dzung Do, and I am an emergency room physician living in the South of Market neighborhood in San Francisco. I use the areas of the GGNRA 2-3 times a week, taking my small dog with me each time. I donate money each year to Greenpeace, drive a hybrid Prius and consider myself a staunch environmentalist. I am also a gay Vietnamese-American, and I go to the GGNRA because of the off-leash laws.

I am a responsible dog caretaker, I always keep her under voice and sight control, clean up after her, and keep her off the fenced off areas. It is important for me to keep Chrissy Field, the area that means the most to me, off leash for dog walking and playing.

I do not think the GGNRA's preferred alternative is acceptable, because it limits off leash walking in many areas within the GGNRA. The proposals are not based upon good science or long term monitoring of site specific conditions.

As shown in the DEIS, the proposed dog management plan reduces and eliminates dog walking access for all new lands within San Mateo county. the GGNRA mission applies equally to new lands as existing lands and it is important for the GGNRA to consider reasonable and fair alternatives for dog walk on new lands as well.

I am worried about the long term perservation of the GGNRA's natural resources and want to the protect the natural areas, but other alternatives need to be considered first. It is not made clear where dogs are allowed. The GGNRA should have better signs and barriers sourrounding the tidal marsh at Crissy Field.

As a responsible dog caretaker, animal advocate, tax-payer and voter, I know it is crucial for dogs to be behaved and trained in this urban environment, and exercise and socialization is essential for a well-behaved dog. Having areas where I can take my dog allows me to exercise as well - which we know is important too. without access to the small amount of land in the GGNRA we currently have, I am concerned that many dogs and their caretakers will not have enough opportunity to exercise as recommended by the American Medical Association.

Some specific problems with the DEIS include the following:

-does not recognize that environmentalists value both recreation and nature, and are not opposing forces. The proposal does not acknowledge that may dog caretakers are aslo environmentalists.

-the plan punishes those who do not train their dogs, are irresponsible and insensitive to the current signs. A reasonable response is to educate visitors, improve signs and help visitors follow rules, and not to ban the rest of us from the GGNRA. I would hope the DEIS would include an alternative along these lines instead.

-DEIS notes that dogs tend to harm natural resources, but there is little documented site specific impacts to support the restrictions. There is certainly not enough to suggest other impacts, such as other wildlife, acts of

Nature, bicyclists, huge crowd events which happen often in this urban city. They need to demonstrate more clearly the effect of off-leash dog walking and playing on the quality of the GGNRA's natural resources. -DEIS needs to provide complete disclosure to the public and decision makers. If dog related disturbances are affecting the wildlife, they need to provide better scientific evidence.

After much thought, I support alternative A, the No Action alternative.

As is, the DEIS is biased against and does not take a closer look at the No Action alternative.

Respectfully,

Dzung Do, M.D. San Francisco, Ca 94107

cc: The Honorable Nancy Pelosi US House Of Representatives 235 Cannon House Office Building Washington, DC 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street, N.W. Washington, DC 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W. Washington, DC 20240

Correspondence ID: 4451 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

There is a major flaw in the GGNRA draft DEIS proposal on dog use that needs to be addressed. This flaw needs to be addressed before any change in dog policy is enacted, or the door is open to major lawsuits (and major costs to taxpayers) due to a change in dog management policy based on this DEIS.

The study begins, Chapter 1, with Purpose and Need for Action. The Need for Action, however, is never scientifically or properly established. The DEIS makes many assumptions about the negative effects of dogs on the parks in determining its need for action, yet almost never backs up these assumptions with site-specific proof.

In the section "CURRENT DOG MANAGEMENT ISSUES AND IMPACT TOPICS" (pages 12 - 21) the potential adverse impact of dogs is

summarized, and almost all of the adverse impacts are written in the conditional tense -- "could" and "might" and "may". There is almost no hard proof that dog use damages the GGNRA or its mission, so the entire basis for the change in current dog management practices is based on a big "maybe." This is not scientific, and this conjecture does not support drastic changes to dog management policy.

Let's take page 14, Chapter 1, "Purpose and Need for Action" as an example. Under "Water Quality" we see three issues raised (italics mine):

- "Issue: dogs playing in streams, wetlands, lagoons and coastal areas can increase turbidity..." The study doesn't say they DO increase turbidity, doesn't prove or even try to prove they do increase turbidity, or that the negative outcomes outlined in this Issue point are realistic outcomes. - "Issue: Dog waste can increase nutrient levels..." Again, no site-specific proof, no backup, just a "maybe" with a lot of "maybe" negative effects. Without site-specific proof, this is not acceptable as a part of an EIS, since it is not based on science or proof, only conjecture. - "Issue: Domestic dogs can potentially introduce diseases..." This is yet-another example of a "maybe" that is not studied, not backed up with hard site-specific facts. It's a conjecture in lieu of a substantiated-reason for limiting dog access. Or, let's look at the "Wildlife" issue, page 15 (italics mine): "Issue: Intensive dog use of an area could disrupt its wildlife..." "Issue: Dog play can trample vegetation..." "Issue: Dogs or dog waste can infect wildlife..." "Issue: Habitat for all wildlife... may be affected by dog use..." Again, all conjecture about what might happen, without site-specific study or facts to prove that these problems are happening in the GGNRA due to dog use.

This untested, unproven conjecture continues throughout the "CURRENT DOG MANAGEMENT ISSUES AND IMPACT TOPICS" section, which is a huge basis for the change in dog policy. It's bad science, and makes for an incomplete and biased environmental impact study. Since the study BEGINS with faulty assumptions, the entire 1,500 plus pages of the study, including its conclusions, becomes meaningless. In computer terms, this is: garbage in, garbage out. Given that the study starts with a lot of unproven "maybes" about adverse affects of dogs on the GGNRA, the case could be made that the DEIS starts off as biased against dogs. It starts from an unproven assumption that dogs are causing problems, and moves towards extremely restrictive policies from there.

If you remain unmoved by my argument, let me offer you this: intensive human use of an area could disrupt its wildlife... child play can trample vegetation... infants or infant diaper waste can infect wildlife... Are you to omit humans from the GGNRA as well? The use of unproven conjecture to justify action is an unacceptable practice and a dangerous precedent.

The GGNRA should redo this study before attempting to change its current dog policy. If they can PROVE that dogs have all the negative effects that the study says they "could" "might" and "may" have, then the rest of the study could or might or may have some merit.

For the record, I am a dog owner who uses Crissy Field, Fort Funston, Baker Beach and other GGNRA areas for safe off-leash exercise and play with my dog. I support the "No Action" alternative.

Thank you for reading and considering my concerns. James Raymond cc: Nancy Pelosi, US House Of Representatives cc: Secretary Ken Salazar, Department of the Interior cc: Mr. Jon Jarvis, Director, National Park Service

Correspondence ID: 4452 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

We appreciate this opportunity to comment on the Dog Management Plan.

San Francisco is a city that has repeatedly demonstrated its commitment to our pets. We are the safest major city for dogs and cats in America ? where 87% of strays find new homes compared to a national average of only about 50%. The San Francisco SPCA has been integral to this success with the help of our 20,000 hospital clients; 12,000 active donors; 4,300 adopters; 1,000 active volunteers; and 200 sets of parents who have children who attend our youth camp.

The parks of the GGNRA ? with their openness, beauty and access to nature - have been used by dogs and their human companions for decades. Many of these people are environmentalists. Responsible dog ownership is entirely compatible with environmental stewardship. Thousands of people and their dogs walk and run peacefully in the park each day leaving nothing more than footprints (and paw prints).

The GGNRA's current pet policy limiting off-leash dog walking to less than 1% of the park area has worked well for park-goers and the environment for thirty years. We readily accept that policies should evolve to meet changing circumstances; however the National Park Service is proposing to drastically reduce the already limited space. This represents a major departure from the current successful model, and is grossly unfair to the thousands of people who enjoy walking responsibly with their dogs.

There are serious concerns regarding the integrity of the Draft Environmental Impact Study on which the GGNRA is basing its proposals. This study is the driving force behind the proposed changes yet does not provide site specific or adequate data linking dog walking to negative environmental impacts. The fact that the GGNRA is in the middle of one the most crowded urban areas in world is also not considered in the DEIS but yet, in the SF Charter the fundamental purpose of the GGNRA is "to improve the quality of urban life". We are concerned with the lack of detail on how the new rules will be monitored, how compliance will be tallied and the one-way direction further restricts our access to the GGNRA if compliance is not at 75% or greater. In addition, not allowing any new lands to be available the dog owning community is simply unfair and unwarranted. We recommend the GGNRA work with and involve local animal welfare organizations, dog groups and the community to ensure that dog guardians continue to have access to these recreational park lands.

We recommend that the GGNRA take a hybrid approach to the preferred Dog Management plan, starting with clear signage so that responsible dog guardians have clear instructions on how to use the park. We recommend that the decision on whether new lands are accessible for dog walking be made with the community and recreation needs in mind rather than the blanket proclamation proposed.

In the Preferred Plan for Ft. Funston, dogs are to be on leash on the sand stairs and pathway down to the beach. For public safety reasons as well as to improve compliance we recommend that dogs be allowed off leash on stairs and pathway.

We firmly believe the National Park Service's proposal is a step backwards for both the people and animals of the Bay Area for whom the GGNRA remains an essential and important part of our everyday lives with our dogs. These goals can be achieved through reasonable steps such as providing clear signage, implementing environment barriers, and continuing to engage the community in developing solutions that work for all parties, without resorting to such a draconian approach.

We ask that you support us and the San Francisco Board of Supervisors in urging the GGNRA to revisit its proposed Draft Dog Management Plan.

Thank you for your consideration.

Sincerely,

Jennifer Scarlett, D.V.M Co-President

Jason Walthall Co-President

Correspondence ID: 4453 **Project:** 11759 **Document:** 38106

ID:

Received: May,26,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Dear Sir:

Dog parks provide the largest daily grass roots meeting grounds for people that I've ever seen or heard about ' people of all ethnic and socio-economic backgrounds meet and interact in dog parks, brought together by their common love of dogs that many also consider to be bona fide family members.

My name is Carma Keats. I've become well known in Dogpatch (lower Potrero Hill) in my 25 years in San Francisco, as I became a community activist when our local dog park reopened after renovations with new rules that no longer allowed the neighbors to meet there to play together and with our dogs. A petition to San Francisco's Parks & Recreation Department restored use of Esprit Park to our large neighborhood demographic through a group I founded known as "Dogpatch Dogs."

San Francisco's overall demographics include a large percentage of people that do not have children or traditional families but do have dogs. Recent statistics state that over 107,000 dogs reside in our City.

I write to you today to plead with you to help the citizens of San Francisco and the Bay Area keep enough space open for off-leash dog recreation in the Golden Gate National Recreation Area (GGNRA) for our needs. As you know, the GGNRA is in an urban area, has a recreational use mandate, and the San Francisco Board of Supervisors passed a resolution opposing what for some (but not for us) is a "Preferred Alternative."

Simple common sense reveals the instant deleterious effect there would be on our City parks if tens of thousands of people and dogs are displaced from daily coastal access ' no scientific study is required to reach that conclusion. It is, however, scientifically verified that snowy plovers make their nests along 1500 or more miles along the Pacific Coast, from Canada to Mexico, so their usage of the GGNRA's 59 miles of coastline is NOT crucial to the species' survival.

Other indigenous California species (such as raccoons, coyotes, foxes and bears) are quickly removed from the GGNRA due to its proximity to the City and its urban population, so the GGNRA will never again be a true or balanced wilderness. However, the GGNRA does provide City dwellers enough access to nature to encourage and promote their support of wildlife

and environmental protection to be conducted elsewhere, in rural venues. Therefore, I sincerely believe it is counter-productive to wildlife protection goals nationwide to deny our City residents recreational access to the GGNRA.

Also, I don't believe the Compliance-based Management Strategy can possibly be constitutional since it punishes responsible people for the behavior of strangers. Yet the "Preferred Alternative" states that if the GGNRA independently claims there's not enough compliance with their new restrictions, then without notice or a public comment they can change an off-leash area into an on-leash area, and change on-leash areas into forbidden zones. If the "Preferred Alternative" is enacted, I would anticipate lengthy legal challenges to the entire GGNRA plan. While the impact of off-leash dogs on nesting birds does not harm the Snowy Plover's chances of survival, the impact of closure of recreational areas would be extremely detrimental to many people in the Bay Area. For example, although I have rewarding relationships, my lifestyle demands that I spend large periods of time without human companionship. If I was unable to walk with my dog, I would feel self-conscious and unsafe walking alone and would therefore become isolated from the society I enjoy. I've met many elderly people, including a notable ex-Nun, in the exact same situation as me ' they simply would not feel free to go outside and enjoy nature at all without the company of their dogs. People and dogs require fresh air and exercise for health; sufficient exercise simply cannot be provided to dogs that are unable to play since they are perpetually on-leash.

Also, my dog is in training to become a therapy dog. We will visit folks that are physically unable to leave the confines of hospitals or nursing homes. Having done this type of volunteer work in the past, I know first hand that many people dearly love dogs but are unable to have their own; when we visit, the elderly and infirm that are housebound can enjoy the health benefits of visits with dogs. People routinely stop me on the street, in parks and at the GGNRA to cuddle and coo and praise my sweet dog, thereby invoking the well documented benefits of contact with dogs upon their own health.

San Francisco has already developed its character as a dog-loving and dog-friendly City ' if they are denied coastal access, our people and dogs will not go away. They will simply be displaced. Some may consider it necessary to try to circumvent oppressive usage rules, causing ungovernable trouble for all.

Sir: Once again, I plead with you to serve our existing reality and our citizens rather than trying to restore pristine wilderness in the GGNRA. Please keep the GGNRA open and available for off-leash dog play so City dwellers can develop the love of nature required to support environmental

protection nationwide.

Thank you in advance for your kind ' and, I hope ' wise consideration

Carma Keats cc: Senator Dianne Feinstein Senator Barbara Boxer
Congresswoman Nancy Pelosi Congresswoman Jackie Speier Secretary Ken
Salazar, Department of the Interior National Park Service, Jon Jarvis,
Director National Park Service, Christine Lehnertz, Pacific West Regional
Director California Senator Leland Yee California Senator Mark Leno
Assemblymember Fiona Ma Assemblymember Tom Ammiano San
Francisco Mayor Ed Lee

Correspondence ID: 4454 **Project:** 11759 **Document:** 38106

Received: May,23,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr Dean:

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness area like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original reason that the GGNRA was established.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the hundreds of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan provides no evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude biased, exaggerated, speculative, and misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Establish fair rules enabling professional dog walking.

These are my personal comments and observations regarding this plan:

I am a birder + see the need for protections of endangered species such as bank swallows + snowy plovers. Volunteers should be asked to keep dogs away from cliffs at Funston + certain beach areas during breeding. However, this is an urban recreation area + people + pets must be sensibly accommodated. Carmel e.g. is a beautiful California town where dogs run free + the beach is spotless.

Pay attention to the need of all the urban residents. If any one is not responsible, other owners quietly intervene for pick up of waste etc.

C. O'Connell

Correspondence ID: 4455 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I oppose the GGNRA current preferred alternative significantly restricting or eliminating off leash dog walking.

I am a senior citizen and responsible dog guardian who has lived near the Presidio of San Francisco for over 35 years. I've watched the transformation of the Presidio under the GGNRA with joy. I treasure my daily walks with my dog at Crissy Field Beach. I love my city and support efforts to make it more livable for all citizens, through such organizations as Friends of the Urban Forest and the Golden Gate National Parks, and with dog training classes at the SFSPCA.

By virtue of its location in or near so many urban areas, the entire GGNRA provides essential open recreational space for our metropolitan area. I certainly am concerned about preserving its natural resources. And to co-exist peacefully in such an environment, I know our dogs must be well

behaved. I'm concerned that without off leash access, however, responsible people and their dogs will not have adequate opportunity for recreation and exercise. Having places in the GGNRA where I can daily take healthy walks with my dog safely off-leash is an experience that cannot be replaced by standing in a small city park, or walking restricted by a leash.

From my observation over these many years of enjoying the GGNRA, I feel the existing 1979 Pet Policy has been working. However, the DEIS treats recreation and the environment as antithetical, as if recreation can only harm natural resources. In fact, most people including those with dogs care about both. The DEIS provides little documentation to support the restrictions of the preferred alternatives. It does not specifically demonstrate that problems within the GGNRA are actually attributable to dogs, and not to other factors such as crowds for special events, wildlife, and even nature herself. The DEIS and draft plan should provide documentation and full public disclosure for any informed decision making on contemplated restrictions. The DEIS should preserve our already limited off leash areas in the GGNRA. Most dog guardians are responsible persons who care about the environment. They should not be penalized for the insensitivity of a few people or for other factors unrelated to off leash dog use.

Sincerely,

Peter F. Jardine San Francisco, CA 94115-2512

Cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of the Interior Jon Jarvis, National Park Service Director Crissy Field Dog Group

Correspondence ID: 4456 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

I am a resident at 3208 Pierce St, #407, San Francisco, CA 94123.1 am writing to you today to voice my opinion on the proposed changes to the current GGNRA off-leash dog areas.

My dog Ted and I utilize the off leash areas at Crissy Field virtually every day. This is one of the main reasons that I choose to live where I do and enjoy the close proximity to several (currently) wonderful areas for my dog to play. It would be extremely prohibitive if those areas were to become leash restrictive as the majority of folks living in San Francisco do not have the luxury of a yard where there dogs can play and get the exercise that they

need, thus an off leash area is imperative or the city will be full of hyper, ill behaved dogs. On any given day that the temperature is not above 60 degrees (which has got to be at least 80% of the time) the beach at Crissy Field is not used by anyone but people with dogs. It seems a shame as well as a waste of taxpayer dollars to maintain an area so large that would not be utilized if the dogs were no longer allowed. In addition the damage to the city parks will be enormous. On the day of the tsunami warning (3/11/2011) Stem Grove, as I am sure was the case with other parks as well, was literally overrun with dogs because they were not allowed on the coastlines. If this were a daily occurrence, the damage would become insurmountable without a huge expense and the parks are much more populated with people and children than the beaches are with the exception of the handful of sunny days in San Francisco.

I think it goes without saying that the majority of San Franciscans train their dogs to be well behaved and adapt to city life. If these same dogs are cooped up and not allowed to run off leash, it could have a terrible impact on every neighborhood in the city.

In a city where there are more dogs than children and known for being one of the most open, accepting cities in the world, we need to be as accomodating to our canine citizens as we are with the rest of the population.

As a resident of San Francisco, I think it is neccessary that we leave the current off leash laws as they are. Regards,

Diane Wales

cc: The Honorable Nancy Pelosi US House Of Representatives 235 Cannon House Office Building Washington, DC 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street, N.W. Washington, DC 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W Washington, DC 20240

Correspondence ID: 4457 **Project:** 11759 **Document:** 38106
Received: May,24,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

This letter concerns the impact of dogs in the recreation areas of the city

and, in particular, the Golden Gate National Recreation Area.

I am a dog owner, so I see the need for outdoor recreation areas that are spacious for dogs to exercise and socialize.

However, I also realize that my canine is only a small part of the nature scene, including native plants and animals. I do not want to see such species harmed because of my carelessness in letting my dog roam outside of designated areas.

I often see people unleash their dogs in public park areas where on leash is a requirement. I have approached people to let them know, but they ignore the ruling.

Off-leash areas should be fenced or well marked. Some trails should be entirely closed to dogs, for some people do not wish to interact with dogs.

Owners who have their dogs off-leash do not take the time to pick up their animals' deposits.

I am more concerned about having the parks maintained as safe and accessible to all users and to preserve the natural plant and animal habitat for now and future generations.

Thank you for reading my comments.

Joyce Stanek

Correspondence ID: 4458 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

I am writing to provide my input on the DEIS for Dog Management in the GGNRA. I strongly reject the Preferred Alternative and instead support Alternative A, the No Action Option of the DEIS, especially with respect to Crissy Field, Ocean Beach and Fort Funston.

I am a 17-year resident of San Francisco, a long-time homeowner and property taxpayer in the Castro/Corona Heights/Buena Vista/Duboce area, a dog owner since 2008, an avid bird watcher, and a supporter of several non-profits working in the environmental and animal rescue areas including SF Nature Education, Cornell Lab of Ornithology, SF SPCA, Golden Gate

Labrador Retriever Rescue, and Muttville.

My current dog is a rescued 1-1/2 year old labrador mix, whom I have trained intensively to respond to my voice and hand commands. She requires and I provide her with substantial (2-3 hours) of vigorous off-leash exercise daily. Such exercise keeps her healthy and happy and discourages destructive behavior at home (inappropriate chewing, digging, etc.) We regularly exercise off-leash at Crissy Field and on-leash in the Presidio.

Any responsible, educated dog owner will tell you "A happy pup is a tired pup." I cannot run or walk with my dog enough to provide the required exercise on-leash. I expect that the same is true for the many other owners of young and active dogs throughout the city. We are urban dwellers and we choose to own companion dogs. We expect SF City parks and SF City land given to the GGNRA--with the proviso that it provide an urban park experience--to address our households' reasonable recreational needs, both for us and our pets. I believe the DEIS Preferred Alternative is unreasonable in several respects.

I believe the DEIS Preferred Alternative fails to address the legitimate exercise needs of dogs by recommending new, significant restrictions on regulated off-leash areas (ROLAs). These restrictions appear to be based on conjecture and opinion about off-leash dog impact on birds and the environment rather than any objective scientific observation or documented sustained destruction of sensitive flora and fauna. I also find the aspects of the policy that will permit GGNRA authorities to unilaterally alter or terminate ROLAs incredibly undemocratic. Any such proposed changes to ROLAs should be made only after significant enforcement action has been taken and documented, ongoing widespread violations continue, there is a strong case for environmental protection of the area, and all of this is put to public review and input.

The new plan would, I believe, inflict undue economic harm on dog-walker professionals, by setting an upper limit on the number of dogs in any off-leash group to 6 per walker. Although I am not a dog-walker, I have regularly observed dog-walkers managing packs of 8-12 dogs safely and effectively at Crissy Field and Fort Funston, and in SF City parks such as Bernal Heights. The economics of dog-walking requires these typically self-employed independent business people to walk more than 6 dogs at once to earn a sustaining income, and SF with its very large dog population needs these dog-walkers to be able to ensure the health and well-being of these pets. I have no objection to the licensing requirement for dog-walkers with 3 or more dogs.

Also, the new plan will drive more off-leash dog activity into SF City parks that are already crowded at times and not equipped to handle the influx. This

will have a negative impact on park users (with and without dogs) and add to SF park maintenance costs which are borne by city taxpayers. My federal taxes support GGNRA and I expect my household to be able to enjoy recreation there.

The Preferred Alternative will tip the balance strongly away from GGNRA's prime founding mandate, which is to serve its surrounding urban community. Again, I strongly urge you to adopt Alternative A, the No Action Option. Thank you.

Sincerely, Rhonda Vitanye San Francisco, CA

Correspondence ID: 4459 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Thank you for hearing my concerns. I live at 43rd Ave and Clement St, at the base of the Land's End, Ft. Miley and Sutro Park areas of the GGNRA, and I am seriously concerned about the dog management proposals being considered for these areas. I strongly oppose ANY unleashed dog activity in these areas for a multitude of reasons but primarily because it is dangerous and destructive.

This debate comes down to two main factors: one, the restoration effort just taking root, and two, the danger of unleashed animals in such a rugged terrain. You can't begin and maintain an environmental restoration project here, one that has cost thousands of taxpayer dollars and years of planning and implementation, and then simply allow unleashed animals free reign over the area to defecate and destroy the work that's barely begun. That is simply ridiculous. I've spoken with several employees of the park management department and volunteers working on this project and every one of them have told me that there isn't a day that goes by under the current rules when an unleashed dog will wander into fragile land space and begin destroying the work they JUST finished.

Secondly, the danger of allowing unleashed animals into such a treacherously beautiful area, combined with countless hikers, joggers, cyclists, tourists, children, seniors, etc., should be a deal breaker for this proposal. If the GGNRA allows unleashed animals onto these trails, some of which are so narrow at points that only single file walking is possible above 400 ft cliffs, there will eventually be an unfortunate accident and potential loss of life. The GGNRA and NPS would do well to protect themselves from potential wrongful death lawsuits by nixing this idea altogether.

The current dog management formula being used in these areas known as

Voice Control needs to be understood for what it really means. It means that those of us without dogs have to rely on the variety of relationships that exist between owners and their pets, some of whom have no control over their animals. We have to trust them to restrain their animals in situations that typically emerge in an instance. Voice Control is not a preventative means of restraint, it is a reactionary formula that is unreliable at best and unacceptable in the potentially dangerous environment it's being applied. Once an owner feels inclined to verbally control their animal it is typically too late. My experience of the effectiveness of voice control has been this: when a runaway dog approaches too close to me and my baby daughter, which happens nearly every time I enter the park, I feel the need to "control" the animal verbally myself.

When I moved to the area almost 5 years ago I became instantly enamored with the beauty and rugged setting that surrounded my new neighborhood. My mind was set at ease simply by walking out my door. However since the debate over this issue has gained momentum, I have honestly not been able to enjoy the benefits of the park, because I'm reminded of it every time an unleashed animal approaches and I'm forced to keep a watchful eye on it until it passes. To think that this might become the norm in an area dear to my heart frankly ruins my quality of life in the neighborhood I've come to love. I am actually baffled that the GGNRA is even being forced to consider allowing unleashed animals into National Park land, against their own Federal guidelines. I believe this issue is a result of an overwhelming and powerful dog owner lobby that exists in San Francisco that forces the position of a vociferous minority over those of a voiceless, disparate majority. My only hope for a reasonable outcome is an already established legal precedent prohibiting unleashed animals on Federal land. Thank you for your time.

Sincerely,

Edward Quigley

Correspondence ID: 4460 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: To Whom It May Concern:

Thank you for extending the public comment period for the new GGNRA management draft. This will allow more voices of the public to be heard.

We live in a densely populated and highly developed area and thank the National Park Service for having the foresight to develop and maintain our

Open Spaces.

Being surrounded by the beauty of nature and having the opportunity to exercise in these Open Spaces allows us all to have a healthy mind, body and spirit ...whether we are two legged or four legged.

I have closely followed the articles, editorials and web sites concerning the new Draft Management Plan concerning dog owners, leash laws, and the environment.

Being that I am a dog owner who loves the environment and is fortunate to walk on the beach everyday, I have started to be more aware of dogs and their owner's behavior. I have noticed over the past few months, it is not our four legged friends that have caused the most damaging impact on our beaches, trails and open space. It is man and his disregard for our environment. I have taken on not only cleaning up after my dog, but cleaning up after humans every day on our beautiful Stinson Beach. I have enclosed just two pictures to prove my point. They say a picture says a thousand words. Susan J. Nelsen Stinson Beach, Calif. 94970

Correspondence ID: 4461 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

The GGNRA draft dog management impact statements are not fact-based and do not address the health or well-being of people, dogs or the community. The GGNRA can accommodate both recreation and conservation. Regulations for Yosemite and Yellowstone are not appropriate for an urban recreation area and the courts have upheld the existing 1979 pet policy. The plan minimizes the one in three households in America with dogs; this plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and more.

I oppose the GGNRA draft management plan and all DEIS alternatives presented because the plan does not provide evidence of impacts that justify such drastic changes to 40 years of healthy dog recreation. The revised dog management plan needs to:

? Rigorously and fairly evaluate the benefits of dog recreation on the health, safety, and well-being of people, the community, tourists with dogs, and dogs

? Remove all speculative, exaggerated, and misleading statements and

measure the actual beneficial and adverse impact of dog recreation on each site

? Provide site-specific need for action justifications and dismissals of suggested alternatives; use objective standards that would apply to any recreational activities such as equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.

? Remove any rules that allow for the reduction or elimination of dog recreation based on law enforcement violations (e.g., banning dogs because of 25% non-compliance with leash laws)

? Retain and formalize the existing GGNRA dog policy (aka the 1979 Pet Policy) and provide for balanced off-leash areas in San Mateo County and new lands

? Provide awareness programs, safety measures (e.g., signage, preventatives for cliff falls, barriers, etc.), land use measurements, and other measures to address any valid adverse impacts from any recreational activity

? Align commercial dog walking rules with county or city regulations

My conclusions are supported by:

-For the health and well being of all dogs in San Francisco, we hope you will continue the present dog recreation sites as they are.

Thank you,

Correspondence ID: 4462 **Project:** 11759 **Document:** 38106

Received: May,25,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

We represent the Crissy Field Dog Group and are submitting these comments on its behalf. CFDG and Eco-Dog are also submitting comment letters, and the comments in this letter are meant to support and supplement those comments.

Introduction

Some of the comments identify deficiencies in the draft Plan and draft EIS (Draft Plan/DEIS), which our client believes is currently inadequate. We emphasize that the purpose of these comments is not to criticize, but is to

improve the proposed plan and to improve the environmental analysis that assists you in developing and making a decision on the plan.

We want dog management in GGNRA to be successful at preserving recreation and the natural, scenic and cultural values of the Recreation Area, without impairment, for current and future generations. We appreciate your stated objective to accomplish this goal too.

These comments pertain to both the draft Plan and draft EIS, which is an integrated document. Where appropriate, based on the comment, the proposed plan should be improved and/or the environmental analysis should be improved to enable an informed decision on the plan.

As you will see, this is not a typical attorney comment letter that takes issue with a statement on page x, requests you to revise section y, or presents a broadside against the draft. We could have written such a letter, but we believe you will likely receive hundred or thousands of such comments from groups and individuals. Instead, we would like to try to start a dialogue on how the plan could be improved. This is especially the case because, for reasons apparent from the background noted at the end of this letter, we do not know whether there will be a meaningful opportunity for dialogue. We request and hope that at a minimum, those seeking constructive solutions such as our client will be afforded that opportunity.

Polarizing Alternatives vs Integrated Alternative

The draft Plan/DEIS does not seem to recognize that environmental values include both recreation and nature. In many places, the document treats these as opposites - that recreation only harms natural resources.

This bias is initially shown in the purpose and need statement on the very first page, which does not include "recreation" as one of the resources to be preserved and maintained in the Recreation Area, while including natural, scenic and cultural resources - despite the fact that all four are core resources specified by Congress in GGNRA's enabling legislation (acknowledged on page 36). This fundamental omission is relevant because, under NEPA, the purpose and need statement is the basis for developing and evaluating alternatives.

This bias is further reflected in the way the alternatives are developed, described and evaluated. For example, the alternatives are classified as ones that maximize dog use or maximize environmental preservation, instead of alternatives that promote both dog walking and natural conservation. Although it is possible to mix-and-match components of different alternatives - or more specifically to use Alternatives A or C as the framework to produce a balanced plan, as discussed later in this letter - this

polarizing approach has two significant problems, which can be addressed.

1. First, the approach inhibits the development of solutions - whether plan elements or mitigation measures - that are designed to preserve recreational and natural resources and values. Mixing and matching flawed components is not the same as developing creative, integrated solutions. We ask you to take a fresh look at this and not be deterred or bound by the prodigious effort that went into producing a 2,400 page draft Plan/DEIS (see additional explanation and suggestion below).

2. The polarized approach tends to polarize stakeholders as well, which in turn puts senior agency officials and legislators, who ultimately must fund the plan, in a difficult position. These participants feel they must choose between protecting natural areas and preserving recreation - two of the core needs and values of the human environment and of GGRNA's mission.

There are many examples in sound environment and land planning principles demonstrating that separation of uses and exclusive uses have negative environmental consequences. In contrast, multiple use approaches and multi-species approaches often strengthen urban vitality and restoration of natural resources. This includes people, as humans are a keystone species in this ecosystem. The draft Plan/EIS lacks the development of this type of alternative, whether as an alternative course of action, an element in an existing alternative, or mitigation measures.

For example, there are areas - several of which were mentioned by citizens at the public meetings held on the draft Plan/DEIS - where trails could be designed to accomplish both native plant restoration and appropriate access to avoid potential conflicts between dog walkers and other visitors. The absence of truly integrated alternatives and a predominant focus on either allowing or prohibiting access reflects the lack of serious exploration of alternatives that involve conflicts concerning uses of available resources (as required by Section 102(2)(E) of NEPA) with a systematic interdisciplinary approach using the natural and social sciences and the environmental design arts (as required by Section 102(2)(A) of NEPA). E.g., 40 CFR 1500.2; National Park Service (NPS) Director's Order DO-12 (DO-12) Secs. 4.4 and 4.11; Department of the Interior (DOI) NEPA Handbook/NPS Handbook for Environmental Impact Analysis (DO-12 Handbook) Secs. 1.4.H-I.

More important than compliance with NEPA, however, the lack of these approaches stands in the way of developing a more balanced plan.

We ask NPS/GGRNA to identify some key areas of where public comments indicate a strong interest in preserving or providing dog walking access or where comments indicate conflicts or controversy that might be solved with good environmental design allowing multiple uses in the zone or area - and

to commission a design charette with a qualified professionals. Budget will understandably be a concern, which is why we suggest a focused approach for some key areas. Regardless, the agency has an obligation to take a "hard look" at alternatives that could resolve resource conflicts, and difficulty of compliance is not an excuse under NEPA. Better solutions will likely reduce costs, whether for defending against legal challenges to the plan or lowering operating costs for enforcement.

Compliance-Based Approach

The bias that recreation is not an environmental value but only an adverse environmental impact also misses the fact that people care about both of these resources and values, and that people with dogs can be - and most of are - good stewards of our environment.

The proposed plan has the effect of punishing many people because a very small number may not be responsible visitors. The reasonable response is to educate visitors and help them to learn how to respect the environment, not to ban the all dog walkers from areas in GGNRA where they have traditionally had access or additional areas where access is reasonable.

The proposed "compliance-based" approach has potential to work, if it is improved to include education and an objective monitoring program designed and carried out with the community. GGNRA should use partnerships with community, animal protection, and conservation organizations to make this work. This could bring additional resources to limited federal resources. GGNRA should be a partner with the San Francisco and other communities.

The compliance-based approach needs more development and definition, consistent with sound adaptive management approaches. E.g., CEQ Final Guidance on Mitigation and Monitoring (2011), Secs. II.A and II.D; DOI 522 DM1 and Adaptive Management Technical Manual (2008). Although some details of the program will necessarily be defined as it is being put in place, the essential structure and elements need to be part of the proposed Plan and discussed in the final Plan/EIS, at least at the level of detail as proposed by the Eco-Dog comments (incorporated by reference herein).

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

This may be a useful tool, but is not sufficient for a management response to close access altogether. A closure without actual impairment caused by dogs would reflect a bias and underlying motivation simply to get dog walking out of GGNRA. It would conflict with both GGNRA's enabling legislation and mission to preserve recreation and NPS's policies on evaluating impairment. To provide opportunity for public comment alone, before a secondary response or closure, would not provide the scientific or technical review needed to review impacts.

An adaptive management program that provides an impartial review available to the public, which is related to actual impacts and the integrity of the resources in the area in question, would provide the necessary basis for a decision on a secondary management response. As explained in the Eco-Dog comments, this should not require a new EIS or re-open the EIS process because it is implementing an impact-based adaptive management plan adopted as a mitigation measure in this EIS process.

Alternatives A and C

CFDG's preferred alternative is a variation on Alternative A, where some access to dog walking in some existing areas would be changed, and the elements common to all alternatives would apply to Alternative A.

The current GGNRA general management plan has policies that promote outreach and education about Recreation Area resources as well as clear rules and compliance. The No Action Alternative is a continuation of the existing management plan. The elements common to all alternatives, including clearer rules about regulated off leash areas (ROLAs) and access, public outreach and education, and compliance-based adaptive management program could all properly be part of implementing the current general management plan.

Another approach would be to develop a more integrated version of Alternative C, as described above, that more closely resembles Alternative A. We can understand that GGNRA wants to convey to the public that it is "taking action" and that people misunderstand the No Action alternative as meaning "nothing is changing."

CFDG agrees change is needed, but not change that substantially restricts dog walking, but change that provides clearer rules, better design (including better signage and physical barrier or cues), better outreach and education, and better partnerships with local governments and community groups.

The draft preferred Alternative C needs substantial work to be a balanced alternative, especially in light of the extremely small area (approximately 1%) within GGNRA where dog walking is allowed. We hope these

comments, CFDG's more detailed comments, Eco-Dog's comments on a compliance-based adaptive management program, and the many excellent and practical public comments submitted will provide a basis for improving the proposed plan.

New Lands

As discussed in more detail in the CFDG comment letter, when new lands become part of GGNRA, the recreational uses existing at the time of acquisition should be allowed to continue unless GGNRA determines, through the site specific public land planning and NEPA process, that unacceptable impairment would occur (a process described in Chapter 1 and Appendix C of the draft Plan/DEIS). The unprecedented "Closed until open" proposal would violate GGNRA's obligation under its enabling legislation and management policies to preserve and maintain recreational uses, violate sound land planning with the community as required by NPS Management Policy, and violate NEPA by prejudging alternatives before site specific public and environmental review.

High Quality Information for Decisionmakers

NEPA's purpose states that environmental information should be available to public officials and citizens before decisions are made and before actions are taken. It goes on to state: "The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA." 40 CFR 1500.1(b), 1502.6; DO-12 Handbook Secs. 1.4.G through I.

The draft EIS notes some studies and general tendencies of dogs to harm natural resources, but, with few exceptions, there is little documented site specific information that supports the specific bans on off leash dog walking areas. We can understand some well-supported changes - both some areas that should be more limited and some areas that should be increased - but CFDG objects to broad new limitations without site specific scientific evidence that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. Please see the detailed comments prepared by TetraTech, a well-respected firm of scientists and environmental professionals, appended to CFDG comments, for examples.

The draft EIS needs to provide full disclosure to the public and decisionmakers. If disturbances are having a significant negative effect on wildlife, for example, the draft EIS needs to take a hard look at whether people or other factors are also causing or contributing to the problem noted. If they are, GGNRA needs to be up front about whether people should also be restricted from these areas. For example, recent studies by NPS at other units of the national park system including Muir Woods National Monument

demonstrate that noise from human activities may be a crucial factor (<http://www.nature.nps.gov/parkscience/index.cfm?ArticleID=346>; http://www.nytimes.com/2011/02/22/science/earth/22sound.html?_r=1). If so, the EIS needs to disclose accurately - not merely assume - the cause(s) of asserted impairment and the impacts of visitors, and the plan needs to disclose whether the Park Service proposes to exclude people from the areas where dog walking is excluded.

The science needs to be sound, and the consequences need to be fully and fairly disclosed. The plan and proposed new significant restrictions on access for dog walking should not be based on unsubstantiated assumptions. Where there is uncertainty, differing points of view should be disclosed.

Urban Quality and Recreation

The draft Plan/DEIS has another pervasive bias (which is related to the polarization of natural and recreational values discussed above). The draft document views GGNRA primarily in a natural context and not in the context of a major metropolitan area.

The omissions discussed below are relevant both for the EIS analysis and the proposed Plan. NEPA requires that an EIS study impacts on the "human environment," that the significance of these impacts are based on their "context" and intensity, and that Plan alternatives be developed and evaluated in order to avoid or otherwise mitigate these impacts. E.g., 40 CFR 1508.14, 1508.27, 1502.1; DO-12 Sec. 4.3; DO-12 Handbook p. 4, Secs. 4.2.A, 4.5.G.2. An example of this bias is in the description of the "General Project Setting" in Chapter 3, which makes passing reference to the City and County of San Francisco. Nearly the entire description is about natural resources (the Biosphere Reserve, California Floristic Province, etc.). The proximity to and use by adjacent urban neighborhoods and the interrelationship with those neighborhoods is not described sufficiently to understand the human environment and resources (including recreation) that may experience an impact, and to understand the effects of the alternatives. E.g., 40 CFR 1502.15; DO-12 Handbook 4.5.F.

Another serious example is the determination to exclude urban quality from the scope of the EIS. EISs are required to provide "full and fair discussion of significant environmental impacts" including "urban quality, historic and cultural resources, and the design of the built environment..." 40 CFR 1502.1 and 1502.16(g); DO-12 Handbook 4.5.F.2(d). GGNRA is located in an urban area and contributes directly and indirectly to its quality, and conversely, is directly and indirectly affected by this urban area. The legislative history of GGNRA could not be clearer about the purpose of the Recreation Area to serve the recreation needs of city dwellers (see CFDG comments, incorporated by reference herein, including the need for adequate

recreation impact analysis). Further, the definition of "human environment" states: "When an environmental impact statement is prepared and economic or social and natural or physical environmental effects are interrelated, then the environmental impact statement will discuss all of these effects on the human environment." 40 CFR 1508.14. The cumulative impact analysis in Volume 2 is a start, but does not provide this direct, indirect and cumulative impact analysis and apply it to refining the alternatives including mitigation measures.

During the public meetings held on the draft Plan/DEIS, and the City of San Francisco Board of Supervisors meeting attended by GGNRA staff - both much appreciated - numerous citizens spoke specifically and eloquently about the importance of GGNRA to urban quality and to the social fabric of their neighborhood and lives, as well as the community cohesiveness related to dog walkers who use the recreation area. These are impacts routinely examined by EISs in urban areas. The fact that GGNRA is also a special natural area does not exempt it from a detailed analysis of urban quality, which is at the core of GGNRA's establishment and its environmental setting.

Urban design is relevant. The design of the built environment is not just about downtown architecture or plazas. The quality and design of open space and recreation areas - including their trails and the manner in which natural restoration and public access are integrated - are also fundamental to the quality of the human environment and urban quality. The bias toward treating GGNRA as a national park akin to a place like Yosemite, where the management principle is to minimize human intervention and allow natural processes to work unaffected by people if possible, is reflected in this summary dismissal of urban quality and urban design as irrelevant to one of the largest metropolitan parklands in the nation. We are not suggesting diminishing respect for GGNRA's natural values or departing from the principles of management for units of the National Park System. On the contrary, as described earlier in these comments, good land planning and design would recognize the urban setting and character of this area and consider urban design in avoiding or reducing potential conflicts among GGNRA's core values, so they can all be preserved unimpaired for future generations.

Request for Dialogue and Consultation

At the outset of these comments, we requested the opportunity for continued, meaningful public participation during the EIS process. CFDG and Eco-Dog believe there are ways to preserve dog walking in most traditional areas and in other areas in GGNRA without degrading natural values.

We can support a preferred alternative based on a scientifically and technical

sound analysis of the current baseline and the impacts attributable to dogs and not other factors, and on a technically-sound adaptive management program that focuses on compliance. We agree it makes sense in some areas to have separate trails or areas on and off leash, and with or without dogs.

As the new Superintendent, you may or may not be aware that - other than in the current official public comment period for which you should be commended - the National Park Service and GGNRA has not allowed any real opportunity in the course of this EIS process over the past 2 years (after unsuccessful negotiated rulemaking ended) to present ideas or to discuss the development of the plan and alternatives with GGNRA or NPS staff. The agency called these 2 years a "quiet period" which excluded public participation. While some reasonable period for an agency to do its homework is certainly appropriate, a 2 year hiatus resulting in a draft EIS is directly contrary to President Obama's policy of transparency and public participation in the NEPA process (Presidential Proclamation on the 40th Anniversary of NEPA (December 31, 2009) , CEQ guidance, and the Interior Department and Park Service's own directives to involve the public throughout the EIS process.

The fact that GGNRA tried, in a mediation process, to engage stakeholders should not substitute for or excuse the agency from engaging on the scope of the draft EIS with communities, groups or citizens who were excluded from that mediation process, or with participants who learned much from that process and had further constructive ideas.

This 2-year public blackout has been exceedingly frustrating to people of good will: (1) who made scoping comments when the Notice of Intent was issued five years ago in 2006; (2) who offered a wide range of reasonable alternatives to GGNRA in a compendium at the conclusion of the negotiated rulemaking process; and (3) who asked to provide additional alternatives and information to GGNRA in the past two years, such as CFDG - only to find that none of these appear to have been seriously considered in the draft Plan/DEIS (see CFDG Appendix K), as required by DOI/NPS NEPA guidance. (e.g., DO-12 Handbook Secs. 4.3 and 4.12).

We mention this by way of background here; we think these concerns can be constructively addressed.

The inadequacy of a scoping process or of public involvement in the development of an EIS is not generally subject to court review, although the agency's overall approach in the NEPA process may be relevant and influence reviewing judges. But CFDG is less interested in challenges than in moving forward on a positive basis with good public involvement.

NEPA intentionally uses the phase "consultation" and not just comment to

reflect a two-way communication between the agency and interested entity. The NEPA rules and CEQ/DOI/NPS NEPA guidance also use the word "meaningful" involvement, which likewise refers to the ability of the agency to engage with interested people to understand their concerns or comments and explore solutions. The word "dialogue" means an exchange, not just a one-way communication. NEPA uses the term "explore," not in the narrow sense of a desktop review only, but what the agency would do to see if a better alternative can in reality occur. Better alternatives are, after all, what NEPA is about.

Both the City and County of San Francisco and we have requested a continuing dialogue and exchange of ideas in the coming months as you consider comments and work on the plan. Specifically:

1. Understanding comments. We note our suggestion made at the public meetings that you, along with staff most involved in developing the alternatives and mitigation measures, meet with interested groups not long after the end of the draft document comment period. The purpose of the meeting would be a real working session for GGNRA to understand the comments made, particularly on the draft Plan, where you can ask questions and understand what a written comment intended. It would not "extend" the public comment deadline or provide commenters with "another bite at the apple." A few sessions could be held with different perceived interests, such as dog walkers, environmental groups, neighborhood groups, and local government. The sessions could be public; we are not afraid of access by other stakeholders to you or others hearing what we intend by our comments on the draft Plan.

2. Update on alternatives. We support the idea you have expressed to San Francisco of having a document and public meeting in the fall to discuss the direction of or a refined proposed Plan.

3. Charette. We recommend and would welcome participation in a design charette on integrated solutions for selected zones or elements of the plan. This technique has been used by public agencies successfully on many projects.
4. Adaptive management. We request an opportunity to participate in a work session with you on the development of an improved compliance-based adaptive management program. This is a key element of any plan, and, as emphasized by CEQ in recent guidance on monitoring and mitigation, it is important for many reasons to develop the bulk of the program now - and the partnership commitments that are essential to its success - as part of the Plan/EIS/ROD, not after-the-fact. This is also important to develop the constituency for its funding, which may require creativity and public-private partnerships as well.

5. Public participation in the NEPA process. We would be glad to participate

in a conversation between DOI/NPS/GGNRA and CEQ/EPA on other public involvement approaches that could be used as you further develop and refine the proposed plan. There are many options under NEPA that do not run afoul of the Federal Advisory Committee Act (FACA) or other laws.

Another extended blackout resulting in a final plan does not serve NEPA's purposes and mandates, NPS objectives for good planning, or the GGNRA's enabling legislation standard of sound land planning.

Thank you again for the opportunity to comment. Please do not hesitate to contact Martha Walters at or me at if you need more information or would like to discuss. Crissy Field Dog Group looks forward to working with you and your colleagues to improve the proposed dog management plan for the Golden Gate National Recreation Area.

Respectfully submitted,

By Kenneth S. Weiner

K&L Gates LLP Attorneys for Crissy Field Dog Group cc: Sen. Diane Feinstein Rep. Nancy Pelosi Rep. Norm Dicks Rep. Doc Hastings Secretary Ken Salazar NPS Director Jon Jarvis Mayor Ed Lee Supervisor Scott Wiener

GGNRA dogmgt draft plan DES comments CFDG

FOOTNOTES:

1 The DOI/NPA NEPA Handbook provides the following example of context: "For instance, the temporary closure of a 1,000 acre recreation area may have minor impacts on the nation's recreation areas, but severe impacts on local residents who depend on the area as their sole source of outdoor recreation for many miles." Though not identical (e.g., the proposed closures to recreational dog walking would have more severe impact because they would be permanent, not temporary), it would be hard to find a more relevant example to the type of analysis still needed in this EIS.

Correspondence ID: 4463 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: To Members of the Negotiated Rulemaking Committee for Dog Management,

I have lived in the Outer Richmond for 4 years now and am a regular visitor to Lands End. I am writing because I have been in (and witnessed)

numerous dangerous situations with dogs and their owners while walking the Coastal trail and I fear it is only a matter of time before someone is seriously injured. This trail is heavily used by joggers, tourists and hikers of all ages. In several parts, the trail is narrow, uneven, steep and bordered by cliffs. There are blind corners, tight turns and several stair cases. When dogs both leashed and unleashed are being led through these sections, it creates serious congestion and apprehension for the parties involved, as well as the potential for serious injury. Alternative D is the best proposal, because it does not allow dogs in the above-mentioned areas. I have included some pictures I took the last time I walked the trail. This was after 3 minutes on the trail if that is any indication of how often these potentially hazardous situations arise.

Thank you for your time,

Maggie Dale - San Francisco resident and weekly hiker on the Lands' End Coastal Trail

Correspondence ID: 4464 **Project:** 11759 **Document:** 38106

Received: May,24,2011 00:00:00

Correspondence Type: Letter

Correspondence: When I was young I wandered all over San Francisco without noticing dogs. I suppose some of them were not on leashes, but I did not notice. But when I reached my sixties I began to have bad experiences with dogs. In the GGNRA I have been rushed at by unleashed, barking dogs on six occasions: in the Sutro Heights Park three times, on the Lands End Trail twice and once in the area below the Veterans Hospital. On three of these occasions I was not aware of the dogs before they rushed me. One reason why I am having trouble now in my old age might be that a person's posture and movements can signal weakness or aggression to a dog,¹ and peoples' postures and body movements change as they age.

Every day in the United States 12,000 people are bitten by dogs, and 2,400 come to emergency wards or hospitals for treatment of dog bites. Children aged 5-9 are most likely to be bitten and treated in outpatient facilities. ² Old people 65-84 most are likely to wind up in hospital.³ This happens because many dog owners cannot imagine their dogs biting anyone. They think that their dogs will be as gentle and loving to others as they are to the owners themselves. A highly educated woman in San Francisco said that her dog was "gentle and loving and affectionate." It probably was, to her But she said this in court, where she was on trial for murder, because her dog had ripped one of her neighbors to shreds in an apartment building. What we perceive as love, gentleness and affection are better understood as submission to the dominant member of the pack, the owners But this does

not rule out aggression toward creatures outside the pack, especially children and old people.

I sympathize with dog owners because the illusion that dogs are like humans is almost impossible to resist. I also understand that most dog owners are so puzzled when their dogs are aggressive that they sometimes blame the victim. None of the owners of the dogs which attacked me apologized, and one berated me when I turned and faced her barking dog.⁶ But lack of understanding is not an basis for policy. Most bad drivers think they are good drivers, and most alcoholics think they can control their drinking. We should not necessarily trust them.

There is also a matter a fairness to children and old people. I do not accept that because I am old I should stop walking in the parks. Now I carry a stick, and do not look at unleashed dogs. (I have learned from experts that staring at a dog is a signal of aggression)⁷. Dog attacks on me have stopped since I started doing this, at least when I walk alone. But when I am with my wife she sometimes cannot avoid looking anxiously at an unleashed dog. Twice I have had to interpose myself and my stick between her and an unleashed dog.

This is no way to enjoy the parks. I don't like going about armed with a stick. But I pay my taxes like everyone else, and walking is about the last exercise available to old people. I feel let down by the city of San Francisco and the Golden Gate National Recreational Area. I was on the island of Hawaii recently. Each of the many state parks I visited had a sign saying "No Animals", and there really were no dogs in those parks (and of course none in the federal parks either).⁸ In those parks you see little children running all over the place without their mothers watching anxiously when an unleashed dog comes close, and you see people spreading blankets on the grass and lying around or picnicking. In San Francisco about the only place you can spread a blanket and lie on the grass is in the arboretum. The very presence of unleashed dogs, whether or not aggressive, makes it impossible to use the parks in the way people in other cities use them.

I was also in Boston recently. All dogs in the parks in Boston are on leashes, except in designated dog areas.⁸ Not just in theory but in practice. I talked to a Park Warden. He said that after the leash law came into effect 15 years ago, it was hard convince people to leash their dogs. Now, he only occasionally finds someone with an unleashed dog. He first gives a warning, and the next time he writes a ticket.

People in Boston or Hawaii are not very different from people in San Francisco, but it seems to me that San Francisco has little regard for the rights of children and old people. I think there should be places for unleashed dogs, but in the city of San Francisco there is nowhere free of

unleashed dogs, except the arboretum. In the Sutro Heights Park near my house, there are signs saying "Pets on leash" at each entrance, but it is rare to be there without seeing at least some unleashed dogs, and on several occasions I have seen at least 30, right on the main pathways. Imagine a child or old person having to walk through 30 or more unleashed dogs.

On the Lands End Trail there is a vague sign that dogs should be under "control" but I have been fiercely barked at there twice by unleashed dogs. Lands End has narrow paths and staircases. A dog can feel threatened if approached by a stranger coming in the opposite direction on a narrow path, which is what has happened to me, twice.

I walk in the Marin Headlands each Sunday morning with a group of others my age, on trails clearly marked "No Pets", but over the past two years I have counted between two and 14 dogs each Sunday, about half of which are unleashed.

I would applaud the Dog Management Plan if it could provide some places for unleashed dogs, some places for leashed dogs and some places with no dogs at all. I like the idea that half of Ocean Beach would be for dogs to run free and the other half would be free of dogs altogether.¹⁰ But I am skeptical. I think there is a good chance that some dog owners will simply take over the whole beach, and no one will stop them. The Plan has little in the way of enforcement. The one true sanction it mentions could probably never be carried out. The Plan says this about enforcement:

When noncompliance is observed in an area, park staff would focus on enforcing the regulations, educating dog walkers, and establishing buffer zones, time and use restrictions, and SUP restrictions. If compliance falls below 75 percent (measured as the percentage of total dogs / dog walkers observed during the previous 12 months not in compliance with the regulations) the area's management would be changed to the next more restrictive level of dog management.

The plan depends, on having park personnel carry out the same tasks they cannot now carry out. Perhaps there is there a reason to think that they will be better able to do them in the future, but I don't see why that should be. Will there be more personnel? Will they be more motivated to enforce the new rules?

Most strange of all is the idea that if the situation deteriorates to the extent that 25 percent of dog owners ignore a rule, a more stringent rule is to be applied. I am sure there is some rationale here, but I cannot find it. Suppose you have a traffic intersection where people do not stop at the stop sign. The normal thing to do would be to put some police there and start issuing tickets. If one car in a thousand violates the law, that is too many. But under

this Plan you wait until one in four people violate the rule and then by the logic of the Plan close the intersection. If you cannot get more than 25 percent of the population to obey a rule, is there any sense in imposing a more stringent rule? What happens if 25 percent flout the more stringent rule? I cannot imagine any administrator moving to a more stringent rule.

And 25 percent is huge. In my experience only a small percentage of dogs are annoying, but those few are enough to make life unpleasant. I am afraid that an administrator who cannot or does not want to enforce the law will hide behind the fact that fewer than 25 percent of the dog-owners are violating the law.

I do not know if this plan has a chance of succeeding. It seems extremely complicated, compared to Boston where the rule is simple all dogs on leash except in designated dog areas, or in Hawaii no animals. If there is an effort to enforce the new rules, the Plan might have some merit and be fair for all concerned, but at present I do not see a willingness or ability to enforce the law, and I am afraid that this will continue.

Nonetheless, I have some advice for administrators trying to do the right thing. If you cannot enforce the law everywhere, at least try to enforce it in some places. In the Marin Headlands there are signs which say "No pets". Many people pay no attention to them. But these kinds of places where the park personnel try to remove invasive plants and preserve endangered butterflies, and where there are coyotes and mountain lions are no places for household dogs. I once heard a horrifying confrontation between a coyote and a dog. The signs there should say something like "No dogs dogs upset the natural ecology of the area penalty for violation \$250."

In places like the Lands End Trail, which has narrow trails and staircases, and is full of tourists, it would make sense to make a genuine effort to enforce a leash law. In the Sutro Heights Park, if you cannot make people keep their dogs on a leash, there is room for a fenced off area where dogs could run free.¹¹

But all of this depends on having the will and the means to carry out at least some enforcement. Thirty years ago it would have been impossible to keep people from smoking on a bus, but now it is unimaginable for someone to do so. I wish the park personnel success in their endeavors. And I thank them for allowing me and the rest of the public to comment on this plan.

Name withheld by request San Francisco, California 94121

cc: Representative Nancy Pelosi Senator Barbara Boxer Senator Diane Feinstein Mayor Edwin M. Lee

FOOTNOTES: 1 Malcolm Gladwell, *What the Dog Saw*, (New York, 2009). Discussions about posture and body language start on pages 219 and 230 of the large print edition. 2 Centers for Disease Control. "Injury Prevention & Control: Home and Recreational Safety, Dog Bite: Fact Sheet (<http://www.cdc.gov/HorneandRecreationalSafety/Dog-Bites/biteprevention.html>). 3 Laurel Holmquist and Anne Elixhauser, *Emergency Department Visits and Inpatient Stays Involving Dog Bites, 2008* (Healthcare Cost and Utilization Project, Agency for Healthcare Research and Quality, Rockville MD.), p. 12. 4 Supreme Court of California, *People vs. Knaller*, 5134543, Filed 5/31/07. The judge thought, that the phrase about being gentle and loving and affectionate was the only sincere thing the defendant said during the trial. 5 Patricia McConnell, *The Other End of the Leash* (New York, 2002), p. 155ff. 6 The Centers for Disease Control recommend not turning away and remaining motionless when approached by dog (Centers for Disease Control, cited in footnote 2). 7 Gladwell, *What the Dog Saw*, p. 219; "Avoid direct eye-contact with a dog": Centers for Disease Control, cited in footnote 2. Patricia McConnell, *The Other End of the Leash* (New York, 2002), p. 35. 8 The website of the Hawaii. Division of State Parks says "PETS and other animals are prohibited wherever posted, and are not allowed in restaurants, pavilions, swimming areas, campgrounds, lodges, or on beaches. Where permitted, pets are to be crated, caged, on a 6-foot or shorter leash or otherwise under physical restrictive control at all times" (<http://www.hawaiistateparks.org/parkrules/>). 9 "No person shall ... have or allow any animal, except a dog on a leash no longer than eight feet, or cat under proper control; or walk a dog in a designated Dog Free Zone" (Official Website of the City of Boston: <http://www.cityofboston.gov/Parks/rules.asp>). 10 Page ix of the Executive Summary says that the ROLA criterion applies north of stairwell 21, and that south of Sloat Boulevard there are to be no dogs. It does not say what the status is of the area between stairwell 21 and Sloat Boulevard. 11 The preferred rule for the Sutro Heights Parks is dog on-leash for "paths, parapet, and lawns" (page ix of the Executive Summary). There is no mention of the preferred status of other areas, or what these other areas might be. There is a path through a wooded area leading down from the Sutro Heights Park to Ocean Beach, which few people use. Is this what is not included among the "paths, parapet, and lawns"? This area is isolated. If something happened there, no one would know it. When I was young I once encountered a truly dangerous dog there. Fortunately it was on a leash. Do you really want dogs running around loose in such isolated, wooded areas? It is just above a narrow staircase where an unleashed dog would feel threatened if it encountered a person, and above some dunes planted with native plants. I would make all of the Sutro Heights Park a leashed area, as it is supposed to be now. People who want to let their dogs off-leash could go to Ocean Beach, which is close by.

ID:

Received: May,16,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Dear Superintendent Dean;

Enclosed please find my comments about the Draft Dog Management Plan/Environmental Impact Statement (DEIS). Please note that these comments are in addition to those sent to you on March 6, 2011.

Historic Presence of Dog in Bay Area including GGNRA sites:

As noted in my comments, the DEIS should be revised to take into account the long presence of the dog in the Bay Area. The dog arrived in the Americas thousands of years ago. The Coastal Miwok people (and other native peoples) that lived here have been known to keep and rely upon dogs as a valued part of their way of life. As such, the dog has made an historic contribution to humanity from when the dog arrived with its humans until the present. The dog has also been a continuous presence in the ecosystem of the Bay Area. The dog is as native to the Bay Area as the wildlife and vegetation considered native today. In considering the role and effects of the dog at GGNRA sites, recognition should be paid to the dog's historic presence in these lands. Please see the enclosed Comments for further details. Thank you for your attention to these Comments.

Sincerely,

Katherine Pattison

Comments on Draft Dog Plan/EIS (DEIS)

May 5, 2011

1. Executive Summary: p. i, Chapter 3 Affected Environment; Chapter 4 Environmental Consequences and throughout document: The Role of Dogs in the Bay Area including the GGNRA sites referenced in the DEIS.

Throughout the document the DEIS characterizes the dog, particularly the off leash dog, as a destructive, exotic animal which, because its biology and behavior, is inherently detrimental to the local, native flora and fauna. The DEIS further describes the dog as having a negative impact on the human environment (visitor experience, cultural, health and safety, park operations). As a result, the DEIS completely mischaracterizes the role of the dog in the history and ecosystem of the Bay Area including the GGNRA sites. The DEIS also fails to document the long, valued and beneficial role of the dog in the human environment of the Bay Area including the

GGNRA. The DEIS should be changed to reflect throughout the document the ancient role and presence of the dog, particularly the off leash dog, in the GGNRA sites. The DEIS should particularly address the following aspects of the dog's role and history in the GGNRA.

? In the Executive Summary, the DEIS describes the Purpose of the Golden Gate National Recreation Area as

"The purpose of the GGNRA is to offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic and recreational values."

In preserving and interpreting the natural and historic values of the GGNRA, National Park Service (and the DEIS) should recognize and support the long and continuous presence of dogs in this unique environment. Dogs in the company of ancient peoples inhabited the Americas thousands of years ago. In the Bay Area, the Coastal Miwok people kept dogs, which were integral to the survival of these hunter-gatherers. Dogs were used for hunting (large and small animals) for guarding, for transportation of goods and for food in special situations. Recent research on dog burials by Miwok people indicates that the dog was a valued member of the tribe. With the arrival of Europeans, dogs continued to play an important role in both native and European life, as working members and as companions for their humans. This role has continued into present day. During the use of the Presidio as major US military post, dogs were important to families, as evidenced by the "pet cemetery" located on the grounds of the Presidio. The tradition of walking off leash dogs in the GGNRA lands continued before and after the formation of the GGNRA. In short, walking off leash dogs in these lands is the oldest continuous human activity conducted on the GGNRA lands. Dog walking dates back thousands of years from ancient times to the present, and certainly predates other human activities supported by the NPS in the GGNRA such as horseback riding and bicycle riding which arrived with the Europeans.

Comment: The DEIS should be changed to document the long and valued contribution of dogs to the human population in the Bay Area in general and in the GGNRA sites in particular, in keeping with the purpose of the GGNRA to interpret and preserve the history and culture of these lands.

? Chapter 3 - Affected Environment and Chapter 4 - Environmental Consequences: The DEIS in each section on natural environment (soils, water, vegetation and wildlife, special-status species) asserts that dogs as a species alien to these lands have been negatively impacting the environment at the sites in the GGNRA. However, the DEIS fails to take into account the long presence of dogs (off leash) in the ecosystem and the lack of

documented, specific negative impact by dogs, as follows:

? In many sections (soil, water, vegetation, wildlife and special species) dogs the DEIS asserts that dogs have and will continue to disturb the environment by: i. trampling, digging, running through areas ii. Urinating and defecating in areas iii. Chasing wildlife iv. Disturbing habitats

Comment: The DEIS fails to take into consideration the long presence of dogs as an integral part of the ecosystem at GGNRA sites dating back thousands of years. Dogs are "native" to the ecosystem since they lived in it, moved through it and worked with their humans to guard and hunt as part of the hunter-gatherer lifestyle of the Miwok and other native peoples. By failing to recognize the historic presence of dogs, the DEIS should be changed to eliminate the mischaracterization of the impact of dogs on the following:

? The DEIS asserts that coyotes in GGNRA sites are disturbed by the presence of dogs, but the DEIS fails to take into account the fact that the dog predates the coyote in the ecosystem and should be changed to reflect the following: a. Coyotes are not native to the coastal habitat in northern California and arrived in a post European settlement expansion out of their original range into the California coastal areas as well as the eastern parts of the US b. Coyotes, as relatively new participants in the ecosystem, have had a negative impact on other native predators such as the gray fox and the bobcat (See, for example, reference to this impact of coyotes on the gray fox in the graphics next to the "fox sculpture" on the Presidio Habitats art tour.) c. Coyotes have shown an ability to expand and to thrive in highly suburban and urban areas throughout the US (including the City of San Francisco) despite the heavy presence of dogs in these areas. For example, there are signs throughout the Presidio and GGNRA sites in San Francisco warning of the presence of coyotes which have been seen in these sites as well as the Golden Gate Park and even local city parks such as Lafayette Park.

? The DEIS incorrectly asserts that the presence of dogs disturbs the habitat of the mission blue butterfly, both its host plant the lupine, and the grasses. (p. 1123) The DEIS should be changed to take into account the following:

a. Dogs have been moving through these areas for thousands of years, so the mission blue would be adapted long ago to their presence and effects of dog movement b. The host plant, varieties of lupine, is dependent on disturbance which was historically provided in large part by grazing herds of tule elk moving through this habitat. The impact of herds of tule elk on the lupine as host to butterfly larvae as well as on the adjacent grasses would be far greater than the occasional presence of a dog running through the environment. If the larvae of the butterfly can survive the effects of a herd of tule elk passing through, the larvae can survive the occasional dog brushing

past. c. The DEIS states that the nutrients added to the soil by dog waste have a negative impact on soils and vegetation. The DEIS fails to acknowledge that the tule elk would have deposited large amount of waste as they moved through this environment, comparable if not exceeding the effects of dog waste in adding nutrients to the soil. d. The DEIS fails to acknowledge that the mission blue has been seen all along areas where dog walking has been taking place for decades, suggesting that dog walking is either not adversely affecting the mission blue or, perhaps, even positively affecting the mission blue.

? The DEIS in several references to the impact of dogs on soil and on water quality should be changed to take into account the following:

a. Dogs have been in the ecosystem for thousands of years, trampling, running, digging, as well as urinating and defecating. Dogs are not new elements in this ecosystem. Moreover, other wildlife historically prevalent in the area, including large animals such as deer and elk, grizzly and greater numbers of smaller mammals and birds would have had a much greater impact on soil compaction and disturbance than a dog today. All of these animals were once busy digging, running, chasing through the habitats. b. While there may be more dogs in the ecosystem today, there is considerably less wildlife. The Bay Area was once teeming with wildlife. Historically all of this wildlife was urinating and defecating, adding nutrients (and occasionally pathogens) to the environment. Dog waste is no different from the waste of other animals in terms of these effects. The impact of dog waste today is no greater than the impact of wildlife historically.

? The DEIS refers to the negative effects of dogs chasing wildlife. The DEIS should be changed to recognize that in this ecosystem historically, there were a variety of predators including dogs assisting humans busily engaged in predator-prey activities (such as chasing birds, small mammals, etc.) The native animals were all adapted to the predator-prey interactions, so dogs chasing wildlife today is hardly a new, exotic activity for birds or other animals. While there may be more dogs today, there are fewer other predators such as foxes and bobcat, that would have chased and hunted small prey animals.

? The DEIS makes a number of statements throughout the document which mischaracterize the behavior of dogs in a variety of situations.

Comment: The DEIS should be changed to eliminate these statements, as follows:

i. The DEIS states that dogs make social trails. There is no support for this statement and, in fact, people (not dogs) make social trails. To the extent that dogs contribute to the creation of a social trail, it is because their human

companions are leading them. People use the social trails to take shortcuts on foot or on bikes. Prohibiting dogs from the area would not eliminate the presence or use of social trails.

ii. The DEIS inaccurately states that off leash dogs go off trails and trample the surrounding area because it is "in their nature." (Chapter 4, p. 314) To support this statement, the DEIS provides some conflicting research data which both supports and contradicts the assertion that off leash dogs routinely go off trails. Comment: Based on the conflicts in the research, the DEIS should be revised to eliminate the reference to dogs having it in their "nature" to go off the trails. Further, my personal experience of walking extensively on trails with my own dog off leash and encountering other dogs off leash indicates that the vast majority of dogs range up and down the trail but not off the trail when accompanying humans on a walk. Dogs that do go off the trail are often encouraged or lead by humans.

iii. The DEIS states in several sections of the document that water quality in a variety of sites is affected by dog waste because dogs have access to these water bodies. Comment: In making these statements, the DEIS should be changed to recognize that dogs do not typically urinate or defecate in water bodies for a variety of behavioral and biological reasons. The only way that dog waste would get into the water body is through run-off, which is limited by the effects of the Bay Areas seasonal rainfall patterns. The DEIS also fails to recognize that water quality is more likely affected by a variety of other sources of contamination, from wildlife and from human activity. For example, children (who often play in these water bodies) do urinate in water.

iv. The DEIS states that the barking of dogs disturbs the contemplation of natural sounds for visitors. P. 18. Comment: By making this statement, the DEIS suggests that most dogs at GGNRA sites are continually barking. The DEIS fails to recognize and should be changed to reflect that barking by dogs at GGNRA sites is extremely limited, as follows:

? A survey of all the GGNRA sites in which dogs are present would indicate that most dogs moving through the site are not barking. The barking dog is the exception. ? Barking by dogs tends to be a territorial response, so dogs bark when they are signaling their territory, including their home, their car, or, occasionally, their owners on the other end of the leash, or sometimes their pack (or group). Individual dogs, particularly off leash, that are moving through an area typically do not consider it their territory and will not bark. ? Since dogs have been present in this ecosystem for thousands of years, the bark of a dog is a more natural sound than the yip of a coyote.

2. Executive Summary: p. zii, p. 45, and throughout document.

Characterization of Alternative C

In various tables the DEIS refers to the Alternative C as "Emphasis on Multiple Use-Balanced by County. In describing this alternative on page 45, the DEIS states that the alternative "emphasizes the diversity of users of GGNRA sites and apportions dog walking geographically across Marin, San Francisco and San Mateo counties by allowing a variety of options in each county."

Comment: The DEIS mischaracterizes this alternative since it is not balanced by county and does not provide emphasis on multiple use for dog walkers. The DEIS should be changed to address the following. The label for this alternative should be changed to reflect the actual impact of the alternative. An appropriate label would be: "Major reduction of dog walking -addition of no dog options to every site in GGNRA."

? At each site the DEIS looks at reducing the options for dog walking and at adding no dog options for other users, despite the fact that in the GGNRA, particularly in Mann County, dogs are already not allowed on the vast majority of the trails, roads, etc.

? The DEIS has no numerical data on number of dogs and dog walkers at each site in relation to the number of other users, so there is no basis for suggesting that the alternative provides for balance among users.

? The DEIS provides NO overall assessment of impacts by county of its proposals. There is no review of the cumulative effects of reducing dog walking options significantly at every site in the GGNRA.

3. Environmental Impact Summary by Alternative (Chapter 2) and Environmental Consequences (Chapter 4)

a. Crissy Field: i. Soils and Geology, Alternative (Alt) A and Alt C, pp.149,291, 293, 360-365.

Comment: The DEIS provides no scientific basis for the negative effects of dogs on soils at Crissy Field and other sites in the GGNRA. The DEIS should be changed to remove any reference to the impact of dogs on soils and should address the following items. ? Assessment Methodology: The DEIS states that "impacts on soil resources as a result of dogs were analyzed qualitatively due to a lack of site-specific data regarding the effects of dogs on soils at GGNRA." There is no scientific study of the effects of dogs on soils at the GGNRA and, consequently, the effects attributed to dogs are based on assumptions and speculation.

? Soil Compaction and Erosion: In the section on soil compaction and

erosion, the DEIS states: "Dog traffic can compact soil" and "Soil compaction also is impacted by multiple other sources, including human foot traffic, bicycles and horses". At Crissy Field, as in much of the GGNRA, dogs are only allowed to walk in areas where human activity is present in a variety of forms. Without a specific scientific study and documentation, soil compaction and erosion cannot be attributed to dogs. The impact of the average dog (weighing 50-60 pounds) and moving on four feet is far less than the impact of the average human, who may be running, riding a bike, dragging a windsurfer, riding a horse, digging a hole, etc. At Crissy Field on the beaches, on the grassy field and along the promenade, there is far more soil compaction from human activity than from dogs. Banning dogs from the GGNRA sites such as Crissy Field would not eliminate soil compaction which is due primarily to other human activities than dog walking.

? Soil Function: The DEIS states "Dog waste contains nutrients and phosphorous, which are nutrients required by plants for growth ...An increase in nutrients from dog excrement in concentrated areas could result in some areas becoming overfertilized and lead to changes ... Comment: There are many sources of nutrients entering urban ecosystems such as the Crissy Field site. Without specific, observed and measured data, it is difficult to determine impact of any one source.

? "It is assumed that future management alternatives of leash control and/or voice and sight control would reduce dog waste" Comment: The DEIS should be changed to remove the above statement. There is no correlation between having a dog on a leash and the human picking up the poop. Based on my multiple daily walks in local parks and at GGNRA sites, I have observed humans with dogs off leash regularly picking up poop, and humans with dogs on leash ignoring poop. Picking up poop is a question of focus and commitment on the part of the human. I am personally extremely offended by those that leave dog poop behind without proper disposal; I would like to penalize those who do not pick up poop but forcing dogs to be on leashes will not solve the problem.

? Alternative A: No Action/Soils: o Referring to the fenced restored dunes, the DEIS states: "dogs often access these fenced areas...Impacts occur from dogs digging in the sand, disturbing dunes, as well as nutrient addition to the soil from dog waste; dune restoration areas at Crissy Field continue to be at risk." Further, "dogs walking or running through dune areas interrupt the natural dune building... Comment: The DEIS should be changed to remove the preceding statements since the DEIS provides no support for the statement that dogs "often" access the fenced dunes and are running, digging, in these areas. I personally have been walking along the Crissy Field area since the renovation project was completed. I have been impressed at the degree to which humans and dogs have respected the

fenced off areas. In the last five years, I have visited Crissy Field on a weekly basis and have seen dogs in dunes less than five times, and then only briefly. I have observed children playing in dunes as often as I have observed dogs. Both trample and dig, regrettably, but fortunately both are rarely allowed to go into dunes. In fact, the Appendix G law enforcement data reflects only 17 examples of dogs in "closed area" at Crissy Field. Over a two year period having 17 brief incursions by dogs into the large amount of closed area which includes the marsh and the fenced dunes cannot account for any measureable impact on dunes. Moreover, there is not documented evidence of specific impacts, as noted in the introduction to the soils section.

o The DEIS further states: "Crissy Field marsh is currently closed to dogs." The DEIS further states, referring to Crissy Marsh, "there are high numbers of citations (over 500 in 2007/2008) related to dog activities (table 9)." Comment: The DEIS should be changed to remove this reference to 500 citations in relation to Crissy Marsh, since 485 of the citations were for "dogs off leash" and only 17 were for dogs in "closed areas." While detail behind the citations is not provided, the "closed area" designation can only refer to either the marsh or the fenced dunes, while the "leash" violations can refer a variety of areas. Most likely, the leash violations during that period (primarily recorded in 2007) reflect the confusion on the part of both dog walkers and GGNRA personnel about the WPA policy'confusion created by both litigation results and poor graphics and boundary designation.

o The DEIS states: "The Dogs can also disturb soils in Crissy Marsh and the marsh inlet." Comment: The DEIS should remove the preceding statement based on the following: As noted above, there is limited evidence of dogs in the marsh, based on Law Enforcement statistics cited above. On my weekly visits I have only seen dog(s) in the marsh once or twice over a five year period. The rare and brief incursion of dogs in the Crissy Marsh would not result in measureable impacts on soils in the Marsh. In fact, referring to the impact of dogs on soils at Crissy Field, the DEIS states. "impacts would be readily apparent and would cause noticeable changes in soils or soil function". The DEIS offers no examples of these "readily apparent" and "noticeable" changes. Absent the documentation of these changes, the DEIS should be changed to remove any references to speculative impacts.

o In the Alt A Conclusion Table the DEIS states that the cumulative impacts would be "long-term, minor, adverse". Comment: The DEIS mischaracterizes the impacts from Alt A since the DEIS has failed to provide scientific, documented support for the impact of dogs on the soil at Crissy Field. The reference should be changed to a "no effect" status.

ii. Water Quality, Alternative (Alt) A and Alt C.

Assessment Methodology: p. 460. The DEIS states, "The analysis of water quality impacts considered the effects of dogs on the water resources of the park, primarily from waste material and direct entry into the water. Impacts were analyzed qualitatively."

Comment: By relying on "qualitative" analysis, the DEIS bases its conclusions on assumptions and speculation without providing any documented, specifically observed impacts from dogs on water quality. As a result, the conclusions on effects of dogs and cumulative impacts are flawed, and the DEIS should be changed to remove any reference to negative effects of dogs on water quality.

Crissy Field Alt A: No Action: pp.496-497. ? The DEIS states "dogs under voice control have been documented as gaining access to the tidal marsh..." Comment: As noted in the above comment on soil impacts, the Appendix G referenced as "documentation" reflects only 17 incursions by dogs over a two year period in a broad area that includes the tidal marsh and other areas. On my weekly visits over a five year period, I personally have only observed dog(s) in the tidal marsh on one or two occasions. The DEIS mischaracterizes the situation, suggesting that the presence of dogs in tidal marsh is a frequent and regular occurrence. The DEIS should be changed to reflect that the presence of dogs in the tidal marsh is extremely rare.

? The DEIS states that dog incursions in the tidal marsh create "intermittent and localized turbidity". The DEIS should be changed to reflect the fact that dog presence in the tidal marsh is extremely limited; and that other sources are far more likely to be factors in turbidity such as: work of the GGNRA in periodically opening the inlet to the Bay using heavy equipment; storm action from run-off flowing into the tidal marsh from inlets on the south side to the marsh; vigorous tidal action when inlet is open to the Bay and water flows rapidly into or out of the Bay. ? The DEIS also refers to "episodes" of turbidity affecting water quality in the inlet and adjacent Bay waters due to the presence of dogs. Comment: The DEIS mischaracterizes the impact of dogs on turbidity based on the other, human and natural activities that have far greater and long lasting effects on turbidity, including: action of winter storms; action of tidal movements on beach and on inlet when inlet open to tidal action; action of children playing; action of windsurfers and equipment; action of GGNRA equipment periodically dredging open inlet. As a result, removing dogs from the inlet would have no measureable impact on decreasing turbidity in the inlet, the marsh or the Bay waters.

? The DEIS also states that the presence of dogs in the inlet and Bay waters increases "the addition of nutrients and pathogens from dog waste." Comment: This statement (as well as many other references to "dog behavior in the DEIS) completely mischaracterizes the typical behavior and activity of dogs. The DEIS should be changed to eliminate all the inaccurate

references to dog behavior. Dogs do not typically urinate or defecate in bodies of water for a variety of biological and behavioral reasons. Moreover, the waters of the Bay and, as a result, the Inlet, reflect the issues of runoff on water quality throughout the Bay'this runoff represents a major source of pollution to Bay waters and contains nutrients and pathogens from a variety of sources including human sewage, agricultural runoff, marine activities, etc. Removing dogs from the inlet would have no impact on the presence of nutrients and pathogens in the waters of the Bay and the inlet.

? The DEIS refers to the "Cummulative Impacts" of Alternative A at Crissy Field as "Negligible to Long Terms minor adverse" Comment: As noted above, the DEIS lacks support for this characterization and should be amended to state "no effect."

iii. Vegetation, Alternative (Alt) A and Alt C, p. 150, pp. 537-767.

? The DEIS refers to the impact of dogs on vegetation in fenced dunes based on 17 citations for dogs in "closed areas" over a two year period. Comment: While regrettable, the brief incursion of dogs over a two year period would not have a measurable impact on vegetation. In fact the DEIS provides no examples of vegetation specifically affected by dog activity. The DEIS should be changed to reflect No Effect from dogs on vegetation in the fenced in dunes. The DEIS fails to account for the impact of children playing and trampling dunes. Removing dogs would not remove impacts on vegetation from human activity.

? The DEIS refers to the negative effects of dogs on the foredunes in the WPA: "there are also sparsely vegetated foredunes that have formed in the WPA that are frequently trampled by dogs" The DEIS should be changed to eliminated this reference based on the following: o With improved fencing and graphics, the presence of dogs in the WPA has been greatly reduced and the dogs that do visit typically walk along the hard sand next to the waters. o The trampling of the foredunes occurs most often due to human activity from families with children playing in the area or other activities (sail boarders practicing, etc.) o Grasses on foredunes at WPA are non-native European due for removal.

iv. Visitor Experience, Crissy Field and All Sites, Preferred Alternative Conclusion Table: pp. 109-220. The DEIS fails to characterize accurately the Cummulative Impacts of the Preferred Alternative on visitors who prefer to walk dogs at each GGNRA site by suggesting that the impact of the Preferred Alternative on dog walker is "minor to moderate adverse." The Cummulative Impact should be changed to Major Adverse based on the following:

? The area for dog walking on or off leash is reduced by over 50% at

GGNRA sites throughout San Francisco (and Marin). ? The opportunities for dogs to enjoy a variety of play areas is greatly reduced. ? The options for a variety of experiences by dog walkers is greatly reduced. For example, the elimination of dog walking on five beaches in San Francisco, the elimination of dogs from virtually all trails in Marin, particularly the Oakwood Valley trail; the fact that in Marin dogs are largely limited to fire road walking where difficult and dangerous encounters with bikers and equestrians will be a regular occurrence. ? The opportunity for families with dogs to enjoy a beach with nearby facilities is eliminated ? The overcrowding in permitted areas for dog walking will increase conflicts between dogs, dog walkers and people involved in other activities who will still have access to all the areas where dogs are permitted ? The impact of dog activity on greatly compressed areas will result in negative effects on vegetation, etc. giving GGNRA a reason to further reduce dog walking in GGNRA ? The boundaries for on versus off leash walking, particularly on the grassy airfield at Crissy Field, are unclear which will lead to inadvertent violations by dog walkers. ? The "Compliance Based Management Strategy" threatens all dog walkers with severe and immediate further elimination of dog walking opportunities based on infractions from a minority. This threat will increase conflicts and animosity, resulting in further deterioration in relations with between dog walkers and park staff. In the criminal justice system there has been discussion about the negative effects of applying harsh penalties for minor infractions. The result is not compliance but defiance. This certainly has applied to the focus of the NPS on enforcement of leash laws in the GGNRA, where the anger, threats by law enforcement to having a dog off leash appears completely inconsistent with the actual behavior of the dog/owner at the time. v. Human Health and Safety: Crissy Field and all Sites: pp. 109-220; pp. 1401-1531.

In describing the cumulative impact of the Preferred Alternative the DEIS states: "Having dogs under voice and sight control at the site would increase the risk for dog bites/attacks and user conflicts." Comment: The DEIS fails to characterize accurately the behavior of dogs in this statement. The DEIS should be changed to show that the Preferred Alternative is likely to increase the rate of dog and user conflicts based on the following:

? Dogs on a leash are often more aggressive due to the constraints of the leash and the proximity of the human on the other end of the leash. It is generally better to let dogs meet each other off leash than on leash. ? Dogs that are kept on leash due to aggressive tendencies are as likely to frighten, attack other dogs and visitors. Some of my most frightening experiences have involved meeting aggressive dogs on a leash. The humans handling aggressive dogs may lose hold of the leash. Simply requiring a leash will not solve the problem of aggressive dogs. ? Compressing the dog walking into greatly reduced areas at all GGNRA sites in San Francisco is likely to

increase significantly the conflicts due to overcrowding in permitted areas.

b. Baker Beach :

i. Soils and Geology, Alternative (Alt) A and Alt D, pp.375-376 The DEIS describes a number of theoretical impacts by dogs on the beach, dunes and bluffs of Baker Beach including:

? Presence of social trails giving dogs access to sensitive coastal scrub habitat ? "Heavy off-leash dog use increases deterioration of native plant communities" ? Impact of dogs walking, running and digging in dunes and foredunes ? Impact from dogs digging in beach sands

Comment: The DEIS provides no support or documentation for any of these impacts specifically taking place at Baker Beach and Bluffs under current conditions or Alternative A. In fact, the DEIS provides information that is directly in contradiction to those statements, as outlined below. As a result, the DEIS should be changed to eliminate any reference to the negative impact on soils from dog activity.

? The DEIS states that dog walking at the site is low to moderate which contradicts the reference to impact of digging, trampling and running by heavy off-leash dog presence anywhere on site, and particularly, in fenced off dunes and on leash required trails ? In Appendix G, over the two year period there are only 5 citations for dogs and none of these is for being in closed areas or harassing wildlife. ? The DEIS provides no support for the presence of dogs on social trails; further, social trails are created by humans (not dogs) and many nude sunbathers and hikers may choose to access that end of the beach by "social trails" ? Most of the "low to moderate" dog walking activity takes place on the beach, not on the trails. ? There are no "foredunes" at Baker Beach ? The beach is very large and the dog presence low to moderate, so the modest amount of digging by dogs will not change the composition of the soil; further, there are children digging and playing in the soil which will still be present if dogs are banned from the beach ? The presence of humans with picnics and fishing in the area down from the two parking lots reflects the impact of human activity in the area, including soil disturbance (playing and digging in sand) and nutrient addition to sands from picnics and fishing (bait, fish, etc.). Evidence of this human impact can be seen in the presence of large numbers of crows that hang around the beach in that area, looking for human food.

ii. Water, Alternative (Alt) A and Alt D, pp.503-504

The DEIS mischaracterizes the impact of dog waste on water quality at Baker Beach as "adverse, and minor to moderate". The DEIS states:

? Referring to Lobos Creek, dogs "may stir up sediments and contribute pathogens and/or nutrients to into the water from dog waste..."dog waste ... may also enter the ocean from tidal and wave actions." "The effects on water quality as a result of dogs would be detectable..." Comment: The DEIS provides no support for the characterization of a "detectable," negative impact of dogs on water quality and the DEIS should be changed to eliminate those statements based on the following: ? The dog walking activity is characterized as "low to moderate", so the amount of dogs engaged in stirring up sediment in the creek is limited, since the creek represents a small portion of the area used by dog walkers. In fact, banning dogs from the creek would not keep sediment from being stirred up by children playing in the creek which is more invasive (visitor use is characterized by low to high and most visitors stay in area close to creek and parking lots)

? Dogs do not typically urinate or defecate in bodies of water (children do).

? The water quality in the creek is already poor due to run-off as evidenced by signs at the culvert which warn of problems with water quality and advise against playing in the water

? Dogs do not necessarily carry pathogens'dogs from San Francisco and Marin benefit from extensive array of veterinary services including services provided for free to support low income dog owners. Pathogens are more likely to come from wildlife including coyotes, raccoons, etc. that may frequent the creek.

? The beach area is quite large, the amount of dog waste small, and the presence of humans and there activities contributing as much to nutrient additions and soil disturbance as dogs.

ii. Wildlife, Alternative (Alt) A and Alt D, pp.937-939.

The DEIS states that dogs have a "minor to moderate adverse" impact on wildlife due to dogs accessing dunes and coastal scrub areas off trails and along social trails.

Comment: The DEIS provides no support for the presence of dogs off trails or in dunes disturbing wildlife. As noted in items above on Soil and Water, the information provided in the DEIS contradicts the assertion based on the relatively low to moderate incidence of dog walking; the fact that most dog walking takes place on the beach itself; and the relative few number of citations involving dogs (most off leash citations and none related to dogs in closed areas or harassing wildlife). The DEIS should be changed to eliminate the impact of dogs on wildlife to no effect.

iii. Visitor Experience, Alternative (Alt) A and Alt D:p. 166; pp. 1401-1531.

The DEIS selects Alternative D as the preferred alternative primarily because "it provides a second beach for visitors to have no dog beach experience." This statement is completely inaccurate and the selection of Alternative D as the Preferred Alternative should be changed based to the selection of Alternative A based on the following:

? The DEIS provides for five beaches to be completely dog free in the Preferred Alternatives selected for San Francisco as follows: o Ft Funston WPA; Ocean Beach WPA; Lands End small beach at end of trail leading down to ocean; Crissy Field WPA; Crissy Field East Beach. ? The DEIS fails to consider that those seeking a dog free beach can also go to beaches in Marin and Pt Reyes. Further, all California state beaches, many state parks and all other national park lands in California severely restrict presence of dogs and require leash on dogs. Visitors who do not want to have a beach experience with dogs have many other options; dog owners have very few options for taking their dogs to an off leash beach. ? The DEIS provides no other justification for not selecting Alternative A since the DEIS fails to document any negative impact from dogs on the beach itself

c. Fort Mason: Visitor Experience: pp. 1463-1464.

In describing the effects on dog walkers from the Preferred Alternative, the DEIS mischaracterizes the impacts by stating that with dogs on leash, dog walkers can use the site for "playing" with their dogs. Comment: The DEIS should eliminate this reference since it is physically impossible (and dangerous) to attempt to play with a dog on a leash. The dog cannot chase the ball, its owner, or another dog and cannot engage in a variety of "play" moves without risking entanglement in the leash and injuries as a result to both dogs and humans.

Correspondence ID: 4466 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to strongly protest the efforts of the GGNRA in restricting dogs from being off leash on GGNRA lands. Dogs are important companions to many people in our city and dog walkers are custodians of the land. They walk on it, love it and look after it, picking up trash, reporting dead animals, and any other problems. Dog owners are law-abiding citizens who by their presence on the GGNRA lands discourage crime of all kinds. It is in the

interest of anyone who cares about open space to work together with dog owners and find a way to coexist.

The complaints from the Audubon Society and the Park Service that dogs are somehow a threat to the coastal areas is ridiculous and vastly overblown. Any instances of dogs harming birds are very rare. This concern can be addressed with proper dog training. As for disturbing the nesting sights this can be addressed through education and signage.

Plants should not take precedence over people in urban areas but live alongside people. We must not forget that we are a city and the same standards of preservation do not apply, as they would in a national park in the middle of nowhere...there must be balance between people and plants.

I would rather see signs asking dog owners to always be respectful of the other users of the beach and not allow their dogs into the areas where the shore birds nest, an education campaign perhaps. Even a license system for owners to have their dogs off leash where they have to prove that the dog is properly trained (rather like a drivers license) might be a solution.

Surely personal responsibility with freedom is better for our society than more restrictions and legislation! This proposed plan is discriminating against one type of person, namely a dog owner; even the coyote has more rights in the Presidio. Dogs provide so much love and support to humans in so many ways; they need places to run free.

Thank you for your kind consideration

Sincerely,

Phyllis Swindells

Correspondence ID: 4467 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

I am writing in defense of dogs and the people who love them. I am a Mill Valley native. I remember when we took our dogs on hikes at Pt. Reyes. Although I understand restricting dogs at that unique, rural park, I do not agree with further restricting dog access to the parks near the urban core of the San Francisco Bay Area.

My 80 year old mother has 2 dogs that she takes out twice every day for a

walk in Mill Valley. This is vital exercise for my mother and her dogs. Typically we do the Oakwood loop in Tennessee Valley or walk on Muir Beach. When we get more adventurous, we go along the coast trail between the beaches. As all of these locations are threatened by the dog management restrictions in the DEIS plan I would like to strongly urge you not to further restrict these locations.

The Oakwood loop is just that, a loop. Dog owners, like us, are hikers, outdoor people. We have dogs because we like to experience nature while we get our exercise. Dogs are our 'excuse' to get out regularly. They are our companions and hiking buddies. We do not want to walk back and forth on the same stretch of path; we would never go to a dog park. We want to experience the nature that surrounds us and get some exercise ourselves. Already the patchwork of trails in GGNRA that allow dogs is incredibly difficult to chart and does not offer distance hiking or loops that allow dogs and their owners to get significant exercise.

It makes me very sad to think of Muir Beach without dogs. Aside from the joy of frolicking dogs, the history of Muir Beach would be lost. Muir Beach has long been one of the alternative beaches where the hippies and others from the counterculture would enjoy the ocean. The rules and restrictions you propose are anathema to this tradition. I know that there is sensitive habitat at the beach but believe that people, not dogs are a far more serious threat to that habitat. I have seen river otter, herons, egrets, starfish, anemones, crabs, bi-valves and various marine mammals while visiting Muir Beach with our dogs.

If you must further restrict off-leash dog access in GGNRA, please consider conditional restrictions. In the city of Boulder they have a Voice and Sight Dog Tag program that permits dogs to be off-leash if they have been certified to be under voice control. If habitat is the primary concern, consider seasonal restrictions only to protect sensitive times for endangered species. If you further restrict dogs in the GGNRA parks of the urban core, those dogs and their people will be displaced into the other parks in these areas. Restricting the exercise options will cause people to have to drive further and cause greater impact on the other parks in our area many of which are designed for people, do not offer expanses for hiking exercise or off-leash frolicking for our dogs.

Please do not further restrict off-leash dog access to GGNRA. Thank you for your consideration,

Marabeth Grahame Mill Valley, CA 94941

Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

My name is Mary Ann Campbell. I live in Berkeley, in Alameda County. I am also a senior citizen who visits many of our local parks that allow dogs.

I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA. All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement, the National Park Service inappropriately singles out dogs. Its conclusions are not based upon sound science nor long-term monitoring of site-specific conditions.

Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

The GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeney Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo County).

Respectfully,

Mary Ann Campbell Berkeley, CA 94707

cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives
Ken Salazar, Secretary of Interior
Jon Jarvis, National Park Service Director
Crissy Field Dog Group

Correspondence ID: 4469 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

Here are my comments on the draft dog management plan:

I don't think dogs should ever be allowed off leash in a National Park. City parks are for recreation and that is where off-leash areas should be. Why are we asked to comment on which spaces that should be allowed to run wild in 'they should not be allowed off leash anywhere in a National Park.

National parks are created to save places of special beauty and history, and to protect wildlife and flora. Dogs are wonderful pets but their place in national parks is very secondary, and often harmful, to the protected sites, wildlife and citizens who are enjoying these special places. I often see dogs running wild, trampling plants and chasing birds and other wildlife which are supposed to be protected. I have seen only 2 or 3 dogs who are well-trained enough to respond to their owner when off-leash. I see dogs running wild daily everywhere in the park while their owners yell at them and the dogs ignore their shouts.

I walk daily because of a medical condition. I have been knocked down twice by off-leash dogs. They meant no harm; they were just out of control. Once dogs are in an area, it becomes a dog area and no other use is safe or enjoyable. How many areas like Fort Funston are you going to turn over for dog use, which essentially excludes all other uses?

With the many areas in the park that propose a use by dogs, will you have enough rangers to enforce the regulations? You can't leave it up to the public; people are very hostile if you ask them to control their dog.

There is already chaos of running packs of dogs on park beaches. Your new regulations are just going to cement that bad behavior for all of the future.

Please withhold my personal information from public review.

Thank you.

Correspondence ID: 4470 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Sir:

As a biologist I would like to comment on the new rules being proposed for dogs in the GGNRA. Our environment becomes more degraded every day. The National Parks are one of the last refuges of wildlife. Any area with dogs running without a leash is not safe for wildlife and never will be. This

plan will create zones that will never be useable habitat for the wildlife that National Parks are supposed to protect. They will be zones barren of any life except dogs.

As you know, the GGNRA has many threatened and endangered species including the SF garter snake and red-legged frog. Please protect all the wildlife in the Park, the way National Parks are supposed to, by not allowing dogs to run loose. Dogs have other places to run; the wildlife does not. Weren't the National Parks created to save animals and plants for the future?

Sincerely, Jens Vindum San Francisco, CA 94118

Correspondence ID: 4471 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean, My name is Bruce Tompkins. I live in San Pablo, in Contra Costa County. I am an environmentalist who also happens to have a dog. We love going to Crissy Field and Fort Funston. I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA. All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement, the National Park Service inappropriately singles out dogs. Its conclusions are not based on sound science or long-term monitoring of site-specific conditions. Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and educating park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources. The GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeney Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo County).

Bruce Tompkin San Pablo, CA 94806 cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Crissy Field Dog Group

Correspondence ID: 4472 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean, Thank you so much for taking time to read this letter. I was born in San Francisco, and have lived here with my husband and two children all of my adult life. I grew up wandering through the Presidio, and believe that the Bay Area open space is some of the most beautiful in the world. In fact as a high school student I volunteered for the GGNRA. Six years ago I adopted a small white rescue dog, and two years after that a toy poodle intended only as a foster joined the household. When my children left home, and my husband passed away they became a very important part of my family. One of my greatest joys is walking and hiking through our open spaces and watching my dogs prance along the paths. I would be devastated to see GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA and don't think I would bring dogs into my household again under these proposed exchanges. While I absolutely understand the importance of balancing recreational uses, children and wildlife, I believe that the course you have chosen eliminates off leash in areas that have been created specifically as open areas for human activities and are already highly trafficked. These areas back up against our urban existence, most have army structures, and in the case of the Presidio, renters. These are not wilderness areas; they are areas where we must all find ways to use the lands as well as steward them. The plans presented simply do not offer a reasonable solution. After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, financial development, education and outreach as part of the overall program. Thank you for your consideration, Patricia Bransten CC: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Crissy Field Dog Group

Correspondence ID: 4473 **Project:** 11759 **Document:** 38106

Received: Jun,01,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My name is Nancy Davis. I live in Berkeley California, in Alameda County. I am disabled but I still enjoy going to parks. I frequently visit Fort Funston/Crissy Field/Ocean Beach, Point Isabel etc. I strongly believe that multi-use open space that includes off-leash dog walking is compatible with

all other recreational uses and with the preservation of habitat and wildlife within the GGNRA. All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement, the National Park Service inappropriately singles out dogs. Skate boarders and cyclists cause me problems. Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources. GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeney Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo County). Sincerely Nancy Davis cc Jon Jarvis, National Park Service Director Crissy Field Dog Group

Correspondence ID: 4474 **Project:** 11759 **Document:** 38106

Received: Jun,01,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Frank Dean,

I am a life-long supporter of GGNRA and the National Parks.

It is disturbing and unacceptable that dog laws are not enforced effectively to protect people, wildlife, and lands.

Dog-walkers are out of control damaging GGNRA lands on multiple levels though misuse and overuse.

Dog-walking business are businesses ' using public resources for their own profits - NOT legal. These businesses also create a disproportional negative impact on these environments and lands.

Enforcement and additional signage are necessary - immediately. Please enforce the existing laws.

Please take action on these fundamental points:

1. Unleashed dogs threaten/damage people, wildlife, and habitats.
2. Dog walkers ignore leash rules and area boundaries ' destroying the habitat we have worked hard to protect.
3. No business should have unregulated access

to our parklands. Dog-walking businesses profit from our public lands and while destroying them through misuse and overuse. 4. No business should be allowed to continue to violate protected areas. 5. Tickets must be issued - when will enforcement begin?

Please take these points to heart.

Thank you for your service, and good luck with the dog plan . Sincerely,
Andrew

Andrew Epstein San Francisco, CA 94118

Correspondence ID: 4475 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: RE: Comments on Dog Management Plan

I am responding to the dog management draft plan as an individual user of park areas. I know that the dog owners are really well organized and have the backing of certain politicians who are using their influence in a heavy-handed way. I fear that the GGNRA will be pressured by these interests.

I feel very strongly that dogs must be on leashes in areas used by the public. The Park that I use the most is Crissy Field. The dogs run freely and are aggressive. It is a fundamental safety issue for the rest of us to be able to walk there without fear of being jumped on and frightened. Some dog owners do not clean up the waste left behind by their dogs ' another safety issue.

At Crissy Field, if it is necessary to create a space where dogs can run free, then it should be a fenced in portion of the airfield, not the beach and not the main path. Indeed, I think that dogs should not be allowed at all on the main path. Crissy Field is a major urban park. Dog owners have no right to trample on the safety and comfort of others. There are other places they can take their dogs.

I really hope that you will not be pressured by the dog owners against the interests of others.

Thank you,

Sincerely,

John Martin

May 29, 2011

Correspondence ID: 4476 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

As a member of the Sierra Club, Audubon Society, and a grandparent who brings children to the GGNRA I frequently visit Fort Funston, Crissy Field and Ocean Beach.

I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA.

All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement, the National Park Service inappropriately singles out dogs. Its conclusions are not based upon sound science nor long-term monitoring of site-specific conditions.

Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

The GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New. Lands" areas (such as Cattle Hilt, Sweeney Ridge, Mod Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo County).

Carol Bledsoe

cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives
Ken Salazar, Secretary of Interior
Jon Jarvis, National Park Service Director
Crissy Field Dog Group

Correspondence ID: 4477 **Project:** 11759 **Document:** 38106

Received: Jun,02,2011 00:00:00

Correspondence Type: Letter

Correspondence: May 27, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan / Draft Environmental Impact Statement

Dear Superintendent Dean,

My name is Robert Petersen and I currently live in Oakland, in Alameda County. However, I previously lived in San Francisco, plan to move back to San Francisco in the next three months and attended San Francisco State University. I visit Ocean Beach, Fort Funston and Crissy Field's on a somewhat regular basis. I have lived at 43rd and Santiago, and 38th and Ortega so these areas have been great locations to go with my two dogs.

It is my opinion that multi-use open space that includes off-leash dog walking and exercise is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA.

All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. Why single out dogs? In the Draft Environmental Impact Statement the National Park Service inappropriately singles out dogs. Its conclusions are not based upon sound science nor long-term monitoring of site-specific conditions.

Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with the community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

The GGNRA was created to provide open space for recreation, including recreation by people with dogs, for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Ranch Corral de Tierra in San Mateo county). Robert Petersen Oakland CA 94619 cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives, Ken Salazar, Secretary of Interior, Jon Jarvis, National Park Service Director, Crissy Field Dog Group

Correspondence ID: 4478 **Project:** 11759 **Document:** 38106

ID:

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Dear Mr. Dean,

My name is Lindsay Kefauver, I live in San Francisco and have been walking my dogs at Ft. Funston since 1978 for 33 years. I am a senior whose health and mental well-being is enormously benefited by being able to walk the trails at Fort Funston where I usually go 5 afternoons a week .

My vote is for Alternative A + or the status quo of the 1979 Pet Policy. The plus is because we desperately need more access for off-leash dog walking on the GGNRA managed lands not less. When the GGNRA adds land then you must open up to more off-leash access. The GGNRA's preferred alternative is clearly too restrictive. There is no justification in the DEIS for major changes to the legal 1979 Pet Policy - yes, twice a US Federal Judge has found your 1979 pet policy to be legal.

Please retain and formalize this existing GGNRA dog policy. The Park Service has not provided any measurements showing that dogs at Fort Funston, Ocean Beach or Crissy Field have a significant impact on the sustainability of threatened and endangered species of wildlife or native plants.

Then what about the NPS's May 31st conference on The Healthy Parks Healthy People US being held in the Golden Gate National Recreation Area? This is being billed as "the first of its kind in the United States...The forum will help forge a vision for the role of parks in contributing to a healthier nation."

I suggest that the GGNRA stand behind what you are promoting as a national program. By choosing to restrict where health enthusiasts can walk in the GGNRA lands, many of whom are women and seniors who might not walk without the company & protection of their dog, you are denying a large group of Bay Area citizens what you pretend to be promoting for the US. Instead of punishing responsible people with dogs who benefit so much from these recreational areas, why don't you try promoting educational awareness with new adequate signage and initially have park rangers out with good will and information instead of acting as a police force. The fact that the NPS is promoting Healthy Parks Healthy People US at the GGNRA headquarters but working to restrict its own local citizens from the benefits of this program makes the program a total sham.

Please work to make the Bay Area a true proponent of Healthy Parks Healthy People US or the program will come back to embarrass the GGNRA.

Sincerely,

Lindsay Kefauver

Correspondence ID: 4479 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 27, 2011 Frank Dean, General Superintendent Golden Gate National Recreation Area Fort Mason, Building 201 San Francisco, CA 94123-0022

Dear Mr. Dean, My name is Julie Feldstein and I live in the outer Richmond District. My family has been San Francisco dog owners for 12 years and we currently own 2 yellow labs. We take our dogs to run everyday, either at Crissy Field, Baker Beach or in the Presidio. I am strongly opposed to the proposed changes to the dog leash laws. It is my understanding that the GGNRA feels that dogs damage the beaches and park land and bother other wildlife, such as birds. Although there are a few irresponsible and inconsiderate dog owners, my experience is that the vast majority of dog walkers are, MORE environmentally aware and considerate than most non dog owners. If you have ever gone to Baker Beach after a warm sunny weekend, you will see lots of trash. It was not dog walkers who left it there ' it was the general population of non dog owners. Guess who picks that trash up on Monday morning - dog walkers! Most dog walkers also play a major role tidying up the beaches and paths they walk on EVERY DAY! I am a member of the Crissy Field Dog Group (as well as Save the Bay) and part of our dues are used to provide plastic bags so that all dog walkers can pick up after their dogs. Doesn't this show that the better course is to work with responsible groups like Crissy Field Dog Group, who are already working with their own money and time, to create a compromise that works for all parties. The dog associations have proven with their actions they are willing to do what it takes ' how about the GGNRA showing that same kind of interest and involvement? I also strongly object to the idea of paying park police to sit and monitor the beaches with the intended purpose of issuing tickets to owners with dogs off leash. What a waste of time and resources! In this day of restricted budgets ' it is unnecessary and a big waste of money. would propose that beaches and parks be open to dogs off leash during restricted hours of the day. I have seen this program work very effectively on a beach where my parent's live in Massachusetts. Why not allow dogs off leash before 10:00 am and after 5:00 pm? This allows people to enjoy the beaches without worrying about dogs, yet give dog owners plenty of time to

enjoy the beaches and parks as well.

In closing, I would like to add that the proposal for restricting the area dogs are allowed to run off leash to certain small areas, such as a portion of Crissy Field, is going to create aggressive dog problems. Does the GGNRA not realize that forces too many dogs into one area creates problems? This is a prescription for dog fights and worse. The proposed changes will undoubtedly create more problems than they solve.

Please work with the population of responsible dog owners - we should be all in this together. Sincerely, Julie Feldstein San Francisco, CA 94121
Member, Crissy Field Dog Group.

Correspondence ID: 4480 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

My name is Lindsay Kefauver, I live in San Francisco and have been walking my dogs at Ft. Funston since 1978 for 33 years. I am a senior whose health and mental well being is enormously benefited by being able to walk the trails at Fort Funston where I usually go 5 afternoons a week and once a week to the beach. I believe that most dog guardians in the Bay Area are as much environmentalists as those of you who aim to ban dogs from our shared, public open spaces.

My vote is for Alternative A + for the status-quo or 1979 Pet Policy. The plus is because we need more access for off-leash/under voice control especially in San Mateo where there is currently no off-leash access and a request to add off-leash areas as more lands are acquired.

The GGNRA's compliance-based management strategy - commonly referred to as the "poison pill" - of the preferred alternative must not be part of any plan. I'm not convinced that this GGNRA strategy is legal. If the GGNRA decides there is not enough compliance with their new restrictions, the status of areas in the GGNRA will automatically and permanently become more restrictive - off-leash becomes on-leash, and on-leash becomes no dogs at all.

How will the GGNRA determine compliance? Will they use volunteers biased against dog walkers? Will it be staff who have gone on record as opposing people with dogs in the GGNRA.

The DEIS does not offer an opportunity for the public to comment on these

changes. The rules will be changed essentially at the whim of a GGNRA official. And no reverse process is offered by the GGNRA - if there is good compliance then more areas are opened up for off-leash, etc.

The GGNRA presents no guarantee of fairness. In fact the DEIS is saying that it is okay for the GGNRA to exclude one group of citizens from our public lands. Isn't this discrimination?

Thank you for your attention.

Sincerely,

Lindsay Kefauver

Correspondence ID: 4481 **Project:** 11759 **Document:** 38106

Received: May,13,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

1 My name is Garret Goo and has lived in Mill valley for over 25 years. It is important to me to take my dogs Daisy & Millie who are miniature dachshunds on hikes in the GGNRA. I am a responsible dog owner who respects our native fauna and wildlife in the GGN.RA. I am also a frequent mountain bike rider and am thankful for having access to the GGNRA especially in the Marin Headlands. I frequently see coyotes, bobcats and rabbits on my hikes & bike rides. Obviously with my dogs being so small they are no threat to the wildlife but nonetheless am respectful.

2) In the DEIS, there is very little reference to RECREATIONAL, uses. Recreation was a major priority in the establishment of Golden Gate National Recreation Area. Very little reference was made to recreational use. GGNRA was set up for urban environment of San Francisco Bay Area. The DEIS does not address a very important component: human recreational environment.

3) I do not agree with the GGNRA 's proposal to ban dogs. Please reconsider this proposal, Most individuals that walk their dogs are responsible and we would like to continue this privilege.

4) The DEIS rationale for the restrictions is not based on scientific research.

5) The document fails to provide documentation or legitimate scientific studies that show that dogs are having a significant negative impact on (birds, environment, etc.). I believe the GGNRA Commission needs to

provide scientific evidence for what you are claiming. When you do, you need to provide that the harmful impact is due to dogs rather than (humans, bicycling, other forms of recreation, other animals).

Best Regards, Garret Goo

Correspondence ID: 4482 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing you with a heavy heart after Much consideration and attending 3 open houses. I oppose the GGNRA's draft dog management Plan. I am a 57 year old professional. dog walker that enjoys Fort Funston 5 days a week for the last 12 years.

Allowing 200 square yards next to the parking lot is not enough for dogs to be off leash with their people. Your trade mark "Parks for all Forever" needs to include the hundreds of humans that value off leash recreation with their dogs for their own mental and physical health as well as their dogs. I have met many people including a man this week that said that his dog and Ft Funston had saved his life because he was a recluse and dog got him to this beautiful place where he socialized with people. The GGNRA can accommodate both recreation and conservation. More sign age and education would be helpful . I ask you to listen to the courts that have upheld the 1979Pet Policy. I am against the Compliance -Based Management Strategy. Any restrictions should be based on actual impacts of the dogs. You are assuming that the dogs have a negative effect on the environment and the birds and the studies do not show that . You say the dogs "could" bother the bank swallows even though they never have.

Your Plan does not take into consideration that the GGNRA is in an urban location and limiting off-leash will have a huge affect on the cities and parks where people will be forced to go if you close us out

I love my job. I perform a service for my clients so that they can go to work knowing that there dog is socialized and exercised . The city parks can in no way compare to usefulness and beauty of Ft Funston.

Dog walking community are a diverse group of people that speak and enjoy the environment and each other as well as our dogs. We are community. Don't break us up we love the parks and want to remain. We want to work with the Park Service. Educational programs and low-lying vegetative barriers at cliffs would be good. Meeting the rangers at the open houses

made me hopeful that this could be worked on so that we could all be happy with the outcome.

Preservation is a fine goal but it must be based on data and science not maybe might's. Please don't throw out Recreation for the thousands of Off leach dog walkers in the GGNRA .

Sincerely Ruth Jensen San Francisco 94112 May 28 ,2011

Correspondence ID: 4483 **Project:** 11759 **Document:** 38106

Received: May,10,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Frank Dean:

I highly applaud the Park's policy of requiring dogs to be on-leash when with their owners in the GGNRA. Do not let dogs run wild off-leash and terroize shorebirds and other wildlife. Or pollute with poop.

Yours Truly Bobb Drake

Correspondence ID: 4484 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to oppose the dog management proposal for the GGNRA. I don't even own a dog and love to go to Ocean Beach and watch the dogs on the beach. Seeing the dogs play and run free gives me a sense of freedom and wistfulness. Watching the dogs gives me the vicarious feeling of walking and running up and down the beach even though I have a disability which keeps me on the sidelines.

As I travel around the Bay Area for work I go to Fort Funston, Crissy Field, Marin Headlands, and San Mateo during breaks . Even on days of the most inclement weather there is a ray of Sunshine when a dog goes by (although the human may not be in a chipper mood) and willing to engage with a wag of a tail.

The "R" in GGNRA is for recreation. For me, and a lot of others, we get our recreation vicariously. As scientific as the study tried to be, there is no quantifying the elation of a puppy wagging its tail, maybe a good sniff, or if really lucky, a lick. According to the NIH, (National Institute on Health) the

act of getting out and getting a good laugh can be some of the best forms of therapy for depression, including SAD (Seasonal Affective Disorder). Off-leash, and on voice command, allows our dreams and aspirations (freedom and unencumbered love) to be channeled through the dogs for a wonderfully good time.

In all, the dogs don't take much but give a whole lot. Let the dogs have their piece of the GGNRA and provide a vital amount of recreation for those of us unable to partake in the physical acts of recreation.

Sincerely, Andrew Lipsett

Correspondence ID: 4485 **Project:** 11759 **Document:** 38106
Received: May,06,2011 00:00:00
Correspondence Type: Letter
Correspondence: I disapprove of the off-lease dogs where wildlife is present - ALL park, esp Crissy Field + Presidio are now. I say NO dogs but on these anyway. Please respond.

Sincerely,

Kim Steele

Correspondence ID: 4486 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am a San Francisco resident and am writing to oppose the GGNRA's draft dog management plan. As an individual with limited mobility, I must point out that the plan discriminates against handicapped dog owners, and is thus in violation of the ADA.

At Fort Funston, all of the proposed alternatives, including the preferred alternative, close the upper trail area to off-leash dogs, thus effectively robbing the handicapped dog owner of the recreational use of one of the few wheelchair-accessible walking trails in the nation. Instead, the authors of the DEIS propose that handicapped individuals hike down a steep incline in order to exercise our dogs away from speeding cars and unfenced cliffs (i.e. away from the blatant dangers inherent in the proposed ROLA), and then hike back up again when done. Since I can only presume that the authors of the DEIS are unfamiliar with what it means to be physically handicapped, it

means that this foolish recommendation (i.e. the "preferred alternative") is a physical impossibility for many of the regular park-goers at Fort Funston and it is thus discriminatory.

To make matters worse, the only support to be found in the entire DEIS for this radical and discriminatory act can, at best, be described as hypothetical rhetoric. The DEIS references "continuing impacts" from dogs upon the bank swallows, yet provides precisely zero documentation and zero proof of any such impacts. Instead, the theoretical belief that such impact "could occur" is illogically transported into an assertion that such impact does occur. This is utterly unacceptable and completely unsound from a scientific level.

Accordingly, I cannot with good conscience support the "preferred alternative," nor any of the other proposed alternatives, and instead must recommend that the current off-leash status at Fort Funston remain unchanged.

Sincerely, Tracy Adamo San Francisco, CA 94105

Correspondence ID: 4487 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Date 05/28/11 Karen Teitel Berkeley, CA 94702

Re: Draft Dog Management Plan/Draft Environmental Impact Statement
Dear Superintendent Dean,

My name is Karen Teitel, I live in Berkeley in Alameda County. I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA.

The dog community is special in that they're always present, regardless of weather; we are out with our dogs enjoying the environment. While it's a given that dogs need to run and be socialized with other dogs, what should be remembered is that for many of us, this is our chosen recreation. And with that recreation we have community with other dog people. We clean up after our dogs (most of us) and do not litter (compared with human-only parks). Many of us stop and pick up litter as we walk and deposit it in the appropriate dispensers. Compare a park that welcomes dogs to a human only park and notice the difference; dog friendly parks are cleaner.

All users (including cyclists, hikers, people with kites and Frisbees,

picnickers, festival-goers, Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement the National Park Service inappropriately singles out dogs. Its conclusions are not based on sound science or long-term monitoring of site-specific conditions. Any impact dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

The GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. Surely there must be a way to share the GGNRA so we can all enjoy our recreation of choice.

The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hilt, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo county).

Respectfully,
Karen Teitel
cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives
Ken Salazar, Secretary of Interior
Jon Jarvis, National Park Service Director
Crissy Field Dog Group

Correspondence ID: 4488 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 25, 2011

To Whom It May Concern

It has been brought to my attention that there are potential plans to close Fort Funston, Krissy Field and the Ocean Beach to people who enjoy walking and running their dogs freely in these public places.

I grew up in and spent most of my adult life including raising my five children in that area. When I return to visit with relatives we still frequent the area, also with our dogs. From what I can see everybody conducts his or her selves very nicely. They seem to keep the landscape undisturbed and clean up after their selves.

These days there are so few places one can take their animals already. Both young and elderly as well frequent these places and make friends of like minds. This is good exercise, fresh air and therapy especially for the elderly

and their dogs.

In closing I want to say that I think this is a gross usurpation of our freedoms and would be a big mistake.

Please reconsider !

Correspondence ID: 4489 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I believe that the off leash dog run area's in GGNRA should remain open for the people and the dogs of San Francisco Bay Area. The people need a place to take there dogs and enjoy the ocean. We do not believe that the area should be for human's only.

Thank you WM Gary Young

Correspondence ID: 4490 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean

I believe that the off-leash dog run areas in the GGNRA must be perserved for the people of the San Francisco Bay Area.

Thank you Patricia LaCava

Correspondence ID: 4491 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: RE: Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean:

I am a native California who grew up in the San Francisco Bay Area. I am writing as a concerned local regarding the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area (GGNRA). I use and enjoy the GGNRA lands and am

concerned about impacts from dog-related recreation on the wildlife, habitats and other park users at the park. I am a responsible dog owner as well as a wildlife advocate. I believe regulated off-leash areas are an appropriate management tool for the GGNRA.

I strongly encourage you to improve the plan by implementing the following steps: 1. All "Regulated Off-leash Areas" should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. Fences provide more security for all park users and create clearer boundaries so that dog owners are aware of how to comply with park rules. 2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance. 3. Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it. 4. At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs. 5. While dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations. Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measures to protect the National Park's valuable resources for everyone and for future generations.

Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measures to protect the National Park's valuable resources for everyone and for future generations.

Correspondence ID: 4492 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Marla Itinshiro. I live in San Pablo, in Contra Costa County. I regularly donate to environmental/gettre-twiented groups such as the National Parks Conservation Association, WildCare, the Natural Resources Defense Council, and the Marine Mammal Center. I am also a member of a minority group. I'm writing to you because I believe that off-leash dog walking in the Bay Area is important for people's health. There's nothing like getting exercise and fresh air with one's best friend.

I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA. All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement, the National Park Service inappropriately singles out dogs. Its conclusions are not based on sound science or long-term monitoring of site-specific conditions. Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and educating park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

The GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeney Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo County).

Respectfully, Marla Miyashiro San Pablo, CA 94806

cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives
Ken Salazar, Secretary of Interior
Jon Jarvis, National Park Service Director
Chrissy Field Dog Group

Correspondence ID: 4493 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Letter
Correspondence: To Frank Dean,

As a native of California, I have always walked my dogs on the beaches. Most of the people that I saw recently at Chrissy Field had dogs with them. Dog owners were cleaning up after their dogs, I didn't see any dog poop on the beach or surrounding park areas. Closing beaches to dogs is un American + unfair to the people + dogs of California.

People who say dogs scare birds are crazy. I have flown up + down the California coast in small planes. and there are thousands of miles of beaches where birds have the place to themselves. If they are bothered by dogs (or even people), then they they can fly there. Dogs and taxpaying dog owners

have a right to access to all California beaches!

Thank you!

Gordon Meyer

Correspondence ID: 4494 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to: ? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation. ? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. ? Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, kiteboarders, etc.). ? Enable professional dog walking and align any professional dog walking rules with county or city regulations. ? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: This is an over correction to a problem. The actions being considered are too

excessive and will create other problems in their wake. Many dogs need to run and play off energy to be good canine citizens. If these areas, (the one I frequent is Fort Funston) are no longer able to feed a dogs mental and physical being the results will be a great setback for our community. I hope you will reconsider this action and consider the health of both people and their pets in this decision. Act from love, not fear!

sincerely, Annalisa Guthridge SM, CA 94402

Correspondence ID: 4495 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I have been a resident of the Marina District in San Francisco since 1997, and my company has our office on the Main Post of the Presidio. As a result, I spend a considerable amount of time in the Presidio and around Crissy Field. I am a runner and a biker and use a lot of the trails/open space in the Presidio.

I am not a dog owner, but wanted to say that in all my time spent in the Presidio, I have never encountered any trouble with any off leash dog or even seen any issues. The dogs and their owners are very much a part of the landscape of the Presidio, and I strongly disagree with any attempt to place additional restrictions on the amount of space available for dogs.

There is no need to change the current plan, and if for some reason the plan is changed, the current proposals I have read are much too restrictive and not in keeping with the open space use that best serves the community

Regards, Mike Ackrell

Correspondence ID: 4496 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Re: Draft Dog Management Plan, Draft Environmental Impact Statement

Dear Superintendent Dean

My name is Arnie Jackson and I am writing to oppose the proposed changes to our coastal access. My dog Shimon, and my dog Schlomo before him, have used and enjoyed these areas along with many thousands of other San

Francisco Bay area dogs. We have not harmed the habitats of the snowy plover or bank swallow, and we will continue to use these areas until I can no longer walk the beach due to my advanced age! (I am 80 years young!)

Should this plan take effect, be assured that there will be a mighty protest from seniors such as myself who have come to love and care for these beautiful coastlines. Do yourselves a favor, and find a way to make these areas safe for the wild animals AND the urban animals!

Thank you

Arnie Jackson

San Francisco, CA 94114

Correspondence ID: 4497 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 27, 2011

To Superintendent Dean;

I have gone to great lengths to train our dog to be courteous to other people, dogs, wildlife, and habitat while he is off-leash. He is a high energy Australian Shepherd working dog, he nor I enjoy hikes with him on-leash. I have two young kids, and the only way I have found for myself and my dog to get the exercise we need is to get up in the morning before everyone, and to hike up the Oakwood valley trail up to the Alta Trail and back. It is the hill that provides the exercise, as my knees don't allow running. I implore you to keep that trail open to dogs off-leash.

Thank you, Wendy Gallo

Correspondence ID: 4498 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

I do not believe the GGNRA draft dog management impact statements are fact based. The GGNRA can accommodate both recreation and conservation. Regulations for Yosemite and Yellowstone are not appropriate for an urban recreation area and the courts have upheld the exiting 1979 pet

policy.

I, personally, own two beautiful Boston Terriers. I am single, and am a finance executive in the Bay Area. I work long hours. I manage a balance by having an extremely well trained and professional dog walker. She has received training from numerous resources, including the SF SPCA. She takes my two boys for 2 hours each day to Fort Funston. The group of dogs is small (8) and are very tightly controlled. This adventure 5 days a week gives them a chance to be the dogs they are and socialize with their friends. Losing places like Fort Funston would be devastating to the dog walkers and their furry friends who are very respectful of the recreational area.

Offering more training and information for individuals who might not be aware of the importance of the lands they get to take their furry friends to would be a great step. Quite frankly, whenever I'm at Fort Funston, every dog owner I've seen is extremely respectful of the land and off limit sections to the park.

Creating draconian rules with poor and misleading data does not solve anything. I respectfully request you revisit the proposal, focus on facts and implement changes that will make everyone feel there is a win/win.

Best regards,

Mark Meagher

Correspondence ID: 4499 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Draft Dog Management Plan/Draft Environmental Impact Statement
Dear Superintendent Dean,

My name is Michael Marino. I live in Vallejo, California in Solano County. I frequently visit San Francisco's Ocean Beach.

I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA. All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement the National Park Service inappropriately singles out dogs. Its conclusions are not based upon sound science nor long-term monitoring of site-specific conditions. Any impact that dogs may have can be effectively mitigated through better

signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

The GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo county).
cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Crissy Field Dog Group

Correspondence ID: 4500 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: To Superintendent Dean;

I have dedicated my career to the conservation of biodiversity. I'm sure you are well aware of the magnitude of this challenge. I am able to bolster the requisite courage and fortitude by retreating to wild nature to replenish my soul. To my trained eye as an ecologist, single track trails are much wilder and more replenishing than fire roads. My wife and I have gone to great lengths to train our dog to be courteous to other people, dogs, wildlife, and habitat while he is off-leash. He is a high energy Australian Shepherd working dog, he nor I enjoy hikes with him on-leash. The only feasible hike I have been able to find in all of Marin that allows this replenishment is the single track trail in Oakwood Valley off of Tennessee Valley Road, all the way up to the Alta Trail. I implore you to keep that trail open to dogs off-leash. There are hundreds of single-track trails in Marin that are off limits to us, please keep this one open!

On a broader scale, I encourage you to identify and explore innovative approaches for allowing the 98% of dog owners that are responsible to not be penalized by the 2% of dog-owners that are irresponsible, ineffective and/or disrespectful. In my opinion GGNRA is a national leader in the DOI for its progressive dog policies, so this approach seems especially apropos. I'd be happy to suggest my ideas if you are interested.

Thank you,

John Gallo Landscape Ecologist

Correspondence ID: 4501 **Project:** 11759 **Document:** 38106

ID:

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Dear Superintendent Dean:

I am writing as a concerned citizen regarding the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area. I use and enjoy the GGNRA lands and am concerned about impacts from dog-related recreation on the wildlife, habitats and other park users at the park.

As a native San Franciscan who views the GGNRA as her beloved back yard as well as a lifetime dog lover, caregiver, and current devoted rescue dog "owner" (or adopter), I strongly encourage you to improve the plan by implementing the following steps:

1. All "Regulated Off-leash Areas" should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. Fences provide more security for all park users and create clearer boundaries so that dog owners are aware of how to comply with park rules.
2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance before initiating measures to improve compliance.
3. Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the Park Service cannot legally permit it.
4. At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs.
5. While dogs are important parts of our families and communities, they are just one animal that is having a significant negative impact on thousands of other animals and plants that rely on the park to survive and many other human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations. Thank you for this opportunity to comment on the Dog Management Plan. I encourage you to adopt the best measures to protect the National Park's valuable resources and the present and future generations of all creatures ' not just human or canine ' who currently enjoy and rely on them for their well-being.

Very best regards, Nancy Fee

Correspondence ID: 4502 **Project:** 11759 **Document:** 38106

ID:

Received: May,27,2011 00:00:00
Correspondence Letter
Type:
Correspondence: DOG POLICY COMMENT

I BELIEVE THAT NO OFF-LEASH DOGS SHOULD BE ALLOWED ON ANY SAN FRANCISCO BEACHES FOR ENVIRONMENTAL AND HEALTH REASONS CITED BY THE AUDUBON SOCIETY AND OTHER ENVIRONMENTAL GROUPS.

I THINK THAT A POINT THAT IS NOT GIVEN SUFFICIENT ATTENTION IN THE DISCUSSIONS OF THE ISSUE IS THE SHEAR, ASTRONOMICAL AND EVER- INCREASING NUMBERS OF DOGS IN SAN FRANCISCO. THE FREQUENTLY CITED NUMBER OF 120,000 DOGS IS LIKELY A VERY LOW ESTIMATE SINCE IT IS BASED ON DOG REGISTRATIONS AND A VAST NUMBER OF DOGS ARE NOT REGISTERED.

THE HUGE NUMBER OF DOGS HAS TRANSFORMED THE QUANTITATIVE IMPACT TO A QUALITATIVE IMPACT. THE AMOUNT OF FECES AND URINE ARE MASSIVE AND WITH MANY PROFESSIONAL DOG-WALKERS, THE RATIO OF DOGS TO HUMANS HAS CHANGED DRASTICALLY OVER THE YEARS. DOG WALKERS SOMETIMES HAVE 5-12 ANIMALS AND IT IS IMPOSSIBLE TO CONTROL AND CLEAN UP AFTER SUCH NUMBERS OF DOGS REGARDLESS OF HOW CONSCIENTIOUS THE "COMPANION" IS.

THE ENVIRONMENT, PUBLIC SAFETY, (ESPECIALLY THAT OF CHILDREN) AND PUBLIC HEALTH ARE AFFECTED ADVERSELY BY UNREGULATED ACCESS OF DOGS. PLEASE DO NOT YIELD TO THE PRESSURE OF THE DOG LOBBY AND PLACE PUBLIC INTEREST AND HEALTH FIRST.

THANK YOU,

HARVEY ROBB

Correspondence ID: 4503 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Letter
Type:
Correspondence: Dear Superintendent Dean:

I am writing concerning the proposed Dog Management Plan.

I urge the GGNRA to adopt the policies for each site that would be most protective of natural resources and wildlife, especially endangered or threatened species. I believe the top concern for national parks should be preservation of the environment and of wildlife.

I also am concerned about the many times I have been approached, touched, or jumped on, whether playfully or aggressively, by off-leash dogs in some areas, especially Crissy Field. Off-leash dogs represent some amount of injury that is just waiting to happen. I would prefer that leashes be required in all of Crissy Field, but if off-leash areas are permitted, I believe they should be fenced. It is plain that neither dogs nor many of their owners or walkers will voluntarily obey leash laws at Crissy Field. Furthermore, the Park Service should vigorously enforce full compliance, not just compliance at a 75 percent level.

Thank you for considering my views. Sincerely, Charles S. Klein Resident of Oakland, user of GGNRA

Correspondence ID: 4504 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: I was not going to comment, because I feel I no longer have a stake in this issue since I am too old to make it up to the GGNRA with my present dog, Khana.

Still, I often recall the times I walked the old mutts in Fort Funston, and I am upset at the thought of others being forbidden to do the same. And, I resent the notion that I would be barred from using the GGNRA. (How can I go for a walk and leave my dog behind? Besides, without Khana to prod me, I would become a total couch potato.)

Incidentally, when young, I belonged to some six conservation organizations. Now, because of the increasing pressure of conservationists to close dogwalking areas in large urban areas, I belong to none. The theory of evolution depends on the fact of extinction. How can new species keep emerging without crowding some pre-existing species into extinction? The ongoing expansion of the human species has the same effect. The only way to save the present variety of species is for the human population to cease expanding.

As for the present, all residents of urban areas need nearby open spaces that

they can use in a variety of ways to cope with life in a stress-filled world. For me, that means dogwalking. Dogwalking in Fort Funston gave me the periods of respite and relaxation I needed during the nearly nine years I cared for my parents, both of whom died at home (aged 95 and 98).
Sincerely,

Barbara A. Broaddus

Correspondence ID: 4505 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: My preference for the dog management plan is to have all dogs on leashes. However, to obtain a solution I endorse the preferred alternative plan suggested by the NPS.

During the last twenty years I have witness the degradation of Fort Funston from an ice plant covered area, still supporting native vegetation, to a weedy wasteland. Even the restored fenced in sections are not spared due in part of their state of disrepair. The biggest offenders are the professional dog walkers that do not have control over their dogs and let them run freely all over. Dog walkers cite that the plastic bag and a pick needed to weed and collect seeds as well as bending while working and even my gray hair makes their friendly dogs act more aggressively. That is why dogs should be on a leash!

Responsible dog walkers want to see the presence of park personnel at Fort Funston to keep aggressive dogs under control.

Please protect our natural environment. Ensure that the NPS mission is fulfilled!

Sincerely,

Ingrid Cabada San Francisco, CA 94110

Correspondence ID: 4506 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

I have been living in the San Francisco Bay Area since 1976. Over the years I have come to enjoy many outings with my friends and their dogs both off

and on leash at Chrissy Field, Ocean Beach and Fort Funston to name a few areas. Because of my love for dogs I became a pet sitter and take the dog or dogs (dogs that live together) to these areas after work and on the weekends. In my daily life I recycle, compost and take great care to make sure the world I live in stay clean and protected and I do not take exception when I am out in any part of the bay area with the dogs.

I like to recreate in the outdoors and want to be with the animals I love. I understand that the existing conditions (1979 pet policy) only gives 1% of the GGNRA for on leash and off leash dog walking. 1% is already such a small percentage and the GGNRA preferred alternative significantly restricts and eliminates off and on leash dog walking in many areas within the GGNRA.

As professionally trained evidence based dog trainer I must tell you that it is important for dog's mental and physical well being to be able to get proper exercise. Dogs by nature are social animals. But I am concerned that if the areas dog guardians can go with their pets are reduced that the city parks will become over crowded.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program. Thank you for your consideration. Joan L. Mapou, CTC 2008 Not Home Alone www.joan4pets.com
joan4pets@yahoo.com

Correspondence ID: 4507 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

I am writing to ask you to please keep the rules that let my family walk with our dog on the beach in San Francisco.

I am 16 years old, a sophomore in high school, and have lived in San Francisco all my life. As long as I can remember, I have walked on the beach on weekends with my parents, my brother, and our dog. It is a great thing we do as a family. We usually walk at Ocean Beach or down the sand ladder from Fort Funston to the beach that is below the stables and if the weather is good we go to Crissy Field. My brother always takes a tennis ball that he throws for our dog to chase and we also throw sticks into the water

for the dog to retrieve.

I think it is crazy that some people think dogs and kids are an incompatible use of the beach in San Francisco. Dogs and kids belong together ' we understand each other and play together. And the long weekend walks on the beach with our dog are some of the best family times I've had in San Francisco. Please don't take that away.

I hope you are listening.

Sincerely,

Emilia Omerberg International High School, Grade 10

Correspondence ID: 4508 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Mr. Dean, I am writing in regard to the proposed changes to the off-leash walking areas in the GGNRA. I find this new proposal draconian and totally unnecessary and unacceptable. The areas currently in use for off-leash dog walking comprise less then 10 % of the entire area. Additionally, it has been demonstrated that the beach area along Ocean Beach is not a nesting area for the Snowy Plover or any other bird species. It appears to me that the proposed changes are an attempt to lighten the burden of an already under assigned Park Range staff.

Correspondence ID: 4509 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

I am writing to express my opposition to the proposed GGNRA Dog Management Plan. I have been a Marin residence since 1980, and have long enjoyed walking my dogs off leash, under voice control, in various GGNRA sites. These outings important for my dog's heath and well-being, and they are very important to my health as well, as they are my principal source of exercise.

I am currently walking at Oakwood Valley trail, the fire road above Mann City, and Muir Beach. My dog and I visit one of these sites almost every day.

In all the 31 years that I have been frequenting the GGNRA, I have never seen a dog interfere with wildlife. In fact, I rarely see wildlife, as they do not like to go where there is human traffic. I see most dogs running off leash, but they virtually always run back and forth on the trails. I rarely see them go off the trail. Does the Commission have scientific evidence that dogs are having a significant impact on wildlife and vegetation?

The provision to allow dogs on leash is not satisfactory. A dog needs lots of exercise. And unless the dog is owned by a marathon runner, there is no way that walking on leash can provide the amount of exercise a dog needs to stay physically and mentally healthy. For every mile the owner walks, the off-leash dog probably logs three miles running back and forth on the trail. As dog trainers often say, " a tired dog is a good dog".

Surely with all the many, many hundreds of acres of land controlled by the GGNRA, there must be room for off-leash dogs on the trails to co-exist with the wildlife and vegetation that occupies the vast majority of the remaining acreage?

Thank you and the Commission for your public service. And I sincerely hope that you will carefully consider the wishes of your dog-owning constituents. Regards,

Marianne Michael

cc: Congresswoman Lynn Woolsey Assemblyman Jared Huffman

Correspondence ID: 4510 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

1) My name is Ryan Jung and have lived in San Francisco for 7 years and Berkeley for 3 years. It is important to me to take my dog to with me to the Golden Gate National Recreation Areas where we play frisbee, ball, and surf. We utilize mostly Fort Cronkhite as well as Ocean Beach, and Crissy Field. However all areas of the GGNRA are important to our mental and physical health. I am a responsible dog owner, my dog is well trained and responsive to voice commands we also are sure to clean up after each other. Having these areas open to dog recreation is a unique feature of our social geography that sets the bay area apart from every other major urban area in California and the United States of America, it is one reason why we moved here. Please continue to allow dogs in the GGNRA and allow off leash areas

for responsible pet owners.

2) In the DEIS, there is very little reference to RECREATIONAL uses. Recreation was a major priority in the establishment of Golden Gate National Recreation Area. Very little reference was made to recreational use. GGNRA was set up for urban environment of San Francisco Bay Area. The DEIS does not address a very important component: human recreational environment.

3) My week is busy, having off leash areas allows both myself and my dog a mental and physical break from urban life. Without these areas I would have to make two trips to two different areas whereas now I can make just one trip 3 times a week. Without these areas my dog would see me packing up the beach gear and bark the whole time I am gone, possibly becoming destructive. He is more well behaved when he gets outings with his pack, we would drive less creating less traffic and smog and I would lead a much more content life.

4)I don't agree with the GGNRA's proposal to alter the current dog rules in its districts. The GGNRA Commission needs to provide scientific evidence for what they are claiming. Thank you for your considerations Ryan Jung

Correspondence ID: 4511 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Supervisor Dean,

I am writing in response to the call for public comments regarding the Golden Gate National Recreation Area's (hereafter abbreviated GGNRA) call for public comments regarding its 2011 dog management plan. To provide context for my comments, it is important to note that I am a homeowner with property in the Pedro Point district that adjoins the Pedro Point Headlands (hereafter abbreviated PPH) in Pacifica. My wife and I bought our house in 2007 mostly for the location: we were thrilled that the land on which our house resided was adjacent to open space that was going to be deeded to the GGNRA, which has had a history of dog-friendly policies. About a year after we moved, we adopted a dog and regularly (almost daily) take her for walks in the Pedro Point Headlands.

Thus, we were dismayed when we saw the proposed preferred alternative for the Pedro Point Headlands that would allow on-leash dog-walking on only a small portion of the PPH trail system located next to Highway 1. There are several neighborhood trail access points to the PPH lands, one at the top of Grand Avenue where we live and another on Olympian Way.

Those access points do not connect to the PPH anywhere near the GGNRA-designated dog-walking trail, however. To access the GGNRA-designated trail, almost all residents of the Pedro Point district of Pacifica would need to get in their cars and drive to the designated trail to walk their dogs or drive elsewhere to walk their dogs, which would contribute further to traffic congestion (already a problem on Highway 1) and cause harm to the environment through pollution. Also, there is no parking area near the GGNRA's designated dog walking trail. One wonders if trail users would park illegally and/or dangerously near the trail entrance. Finally, because the GGNRA-designated trail for dog-walking in the PPH is so close to the highway as to be unpleasant and because no nearby parks are dog walker-friendly, I expect that most Pedro Point residents with dogs, including us, would drive down the coast (e.g. Montara or beyond) to find a place to walk our dogs.

Consequently, I would like to recommend that the GGNRA recast its dog-walking plan for the PPH to permit dog walking on the South Ridge Trail, Bluff Trail, North Ridge Trail, Middle Ridge, and the Arroyo Trail. This change would enable Pedro Point neighborhood residents who walk dogs to access the PPH lands on foot, without having to drive to a single trail head near Highway 1. Moreover, this change would also allow dog walkers to make a loop within the PPH trail system (as a general policy, I recommend that all GGNRA parks have loop trails where dog walkers are able to make a loop).

I would also like to recommend that GGNRA consider allowing on-leash dog-walking with leash lengths longer than 6 feet because in my experience at PPH a 6-foot leash is very short and somewhat dangerous when negotiating the steep slopes on the PPH.

If modification of the existing options along the lines of what is proposed in the paragraph immediately above is not possible, I would choose the current policy option that preserves unregulated dog walking over the proposed alternative that restricts dog walking to a greater than it is at present.

I thank you very much for your consideration of my views on this important topic.

Sincerely,

Tor Neilands

Correspondence ID: 4512 **Project:** 11759 **Document:** 38106
Received: May,05,2011 00:00:00
Correspondence Letter

Type:**Correspondence:** Dear Superintendent Dean,

I was born and raised in San Francisco. Living in the Marina District, the shore area of the Presidio was my playground, even during the WW II years. It would not be exaggerating to say that I have walked those shore for most of my life, and almost always with a dog. At 75 I still get over to the Crissy beach at least four times a week, keeping both of us healthy.

I financially support a number of environmental organizations, including the GGNRA. I support , as well, the Crissy Field Dog Group for assuring city dwellers that there can be accessible open spaces where dogs run free, and that this is not in contradiction to best utilizing the magnificent gift of the GGNRA. I am a witness to the fact that the vast majority of dog owners using Crissy Field and Beach do not in any way abuse the privilege. In point of fact, the great majority of days at Crissy Field and beach are populated overwhelmingly with dogs and their owners. The handful of "warm" weather days are truly the exception to weather that keeps most people away. On any average day the number of folks with dogs far outnumber those without.

I often marvel at the reasoning behind most of the environmental impact studies that keep getting thrown at the situation. It seems to preclude the common sense observation that Crissy Field and beach lie within a tightly packed, limited space that must serve the needs of an urban (key word) environment. The rules make sense both south and north of the "city" boundaries, but within the city the various needs of the population, and keeping that population's beloved dogs healthy, must come first. So often it seems that a monolithic "one rule fits all" is the primary GGNRA reasoning. I would expect a more reasoned approach from the GGNRA.

I truly hope that, using common sense, the decision to maintain off leash beach use is not restricted more than it currently is.

Correspondence ID: 4513 **Project:** 11759 **Document:** 38106**Received:** May,27,2011 00:00:00**Correspondence Type:** Letter**Correspondence:** General Superintendent Dean,

I was raised and have lived and worked in the Bay Area my entire life. For many years, I have sought recreation and relaxation with my dogs at local Bay Area Parks, particularly Fort Funston. Presently, my faithful and treasured companion's name is Lucky. I thoroughly trained and socialized him; he has passed the rigorous Canine Good Citizen Test and is certified by

the American Kennel Club. He is the most gentle, big hearted and fun loving companion, and we've been going to Fort Funston his entire life. This unencumbered open space has allowed for off leash recreation, and has provided a wonderful source of community and fellowship for many years for dog owners and their dogs alike.

The EIS Dog Management Plan would have terrible impact on Fort Funston. The institution and enforcement of the oppressive restrictions proposed against dogs and off-leash recreation would destroy the wonderful, harmonious and unique community that exists there, and deprive us and our dog companions the use of the few parklands available for such activities.

Through my study of the GGNRA proposal, and attendance of Town House meetings and hearing, I believe the EIS is scientifically insufficient to justify proposed restrictions, and proper impact studies have not been performed, nor an assessment of the critical value of these open parklands for dog owners and their companions living in metropolitan areas. In fact, I feel the draft EIS disregards the health and well-being of people, dogs, and the community by excluding Bay Area residents such as me who exercise regularly with their canine companions. In so doing, I believe the plan discriminates against all people with dogs, including families (of which dog companions are an important member of), seniors, minorities, and the disabled.

In many cases, the allegations in the EIS are directed at a small number of uneducated or irresponsible individuals. Wouldn't the most reasonable response in these cases be to educate these visitors and help them learn how to respect the environment, as opposed to sweeping restrictions that would devastate the rest of us with our dogs? I encourage that the draft EIS would include an alternative along these lines.

I also feel strongly the GGNRA should integrate development of a management plan with a robust public educational component in collaboration with local animal welfare organizations such as the San Francisco SPCA, Marin Humane Society and the Peninsula Humane Society/SPCA. These experienced and dedicated groups would prove invaluable in providing training for dog owners and provide educational advice about being a responsible dog owner, and would help generate a fair proposal to balance protection of the environment with the needs of the metropolitan community.

I agree with GGNRA's efforts to protect specific areas found to be important wildlife breeding grounds in the form of clearer rules, education and signs. In areas where this has been performed at Fort Funston, I think you would be gratified in the efforts of most people to respect and comply with these

protected areas.

However, the extreme severity of the EIS proposal is an unnecessary and extreme overreaction to control the entire parklands at the expense of the local populace. The draft EIS does not recognize that many of the parklands of the GGNRA impacted are located in or next to urban Bay Area neighborhoods that are dependent on these open parklands. The draft EIS excludes the quality of the urban environment from its scope, suggesting that it is not relevant. As attorney Ken Weiner made clear at the S.F. hearing on April 11, this is an inaccurate and surprising ideology since the fundamental purpose of GGNRA is to serve these urban areas; Original congressional intention and mandates clearly indicate GGNRA was given these urban parklands in large part to provide needed recreation and open space for the local metropolitan population. It is unacceptable the EIS does not examine the adverse impacts to our community with the drastic restrictions imposed on dog owners and their companions. I would find the severe restrictions in the preferred plan at Fort Funston extremely oppressive and would destroy the serenity and fellowship of this park, and I would be compelled to try and find somewhere else to go with my dog for the freedom, open space and solitude we need.

The draft EIS is comprised of many allegations against dogs and their tendency to harm natural resources, but there is little documented site-specific information that supports the specific bans on off leash dog walking areas. The staggering scope of the sweeping new restrictions is without site-specific science that proves that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. If dog-related disturbances are having a significant negative effect on animals, plants, species diversity, erosion, ground water contamination, etc., the draft EIS needs to provide site-specific scientific evidence and peer review that documents and proves these allegations. Also, honest assessment must be made whether people or other factors are also causing or contributing to problems noted. The science must be sound, controlled, and peer reviewed, and the consequences need to be fully and fairly disclosed for everyone so that an informed decision can be made.

An additional disturbing observation I have made is with regard to new lands within the GGNRA. In the draft EIS, dog-walking access is eliminated for new lands within the GGNRA. I feel strongly that GGNRA's mission applies equally to new lands as existing lands and it is essential for the GGNRA to consider fair and reasonable alternatives for dog walking on new lands. In conclusion, having studied the EIS, and from all I have learned and witnessed at Town Hall meetings and the San Francisco Hearing, I found there to be serious lack in substantive scientific or impact studies to justify imposing restrictions, as well as a disregard for the needs and welfare of local metropolitan communities the GGNRA is obligated to

serve. I therefore strongly support Alternative Plan A for Fort Funston, and appeal to you not to implement this severe and destructive proposal.

Sincerely,

Mark Armanini

Pacifica, CA 94044

Cc: Representative Nancy Pelosi, 8th Congressional District of California
House Minority Leader, U.S. House of Representatives Ken Salazar,
Secretary of Interior Jon Jarvis, National Park Service Director San
Francisco Dog Owners Group

Correspondence ID: 4514 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean, Many thanks for your efforts on behalf of the citizens of and visitors to our City. I'm writing to urge the GGNRA to require pet owners to keep their dogs on leash at all times in GGNRA parks. With appreciation and thanks, Paul J. Weaver San Francisco, CA 94111

Correspondence ID: 4515 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled,

minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Enable professional dog walking and align any professional dog walking rules with county or city regulations.

Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely, Corrinne Casassa

San Francisco, CA 94107

Correspondence ID: 4516 **Project:** 11759 **Document:** 38106

Received: May,03,2011 00:00:00

Correspondence Type: Letter

Correspondence: David J. Fix San Francisco, CA 94117

April 30, 2011

Superrintendent Dean:

I am opposed to the proposed changes to the rules for dogs in the GGNRA. I

have a dog, but do not go to the GGNRA often. However, when I have, I did not notice any problems with the current rules, so I am not sure why the changes are proposed. Most dog owners seem to be responsible in taking care of their dogs. I understand that this is a contentious issue, but dogs and dog owners need a place also. As they say, if its not broke, don't fit it.

Thank you

David Fix

Correspondence ID: 4517 **Project:** 11759 **Document:** 38106

Received:

May,05,2011 00:00:00

Correspondence Type:

Letter

Correspondence:

I would like to weigh in on the dog management plan on which you're working at this time. I like most dogs but am not a dog owner. I feel that if you live in an urban area, you shouldn't own a dog. I do a good amount of walking and hiking both in Pacifica, where I live, and the surrounding areas. My experience is that the vast majority of dog owners with whom I have contact are very reasonable and care about protecting both the wildlife and the surrounding flora. I am involved in protecting endangered species (the snowy plover at Pacifica State Beach and San Francisco garter snake at Laguna Salada) and threatened species (red-legged frog at Laguna Salada). When presented with the information about the species most dog owners move both themselves and their dogs out of the area. The exception is a small group of dog owners (5%?) who feel that their dogs have absolute rights. If the choice is between degradation of an area, the loss of a species, even the disruption of an area or their dogs right to run free, to them the choice is obvious, dogs first. I have seen some dog owners even threaten people who do nothing more than point out their dog is in a sensitive area.

What I would like to see is as many dog-free areas as possible in the parks. In all other park areas where dogs are allowed, they should be on leash only within clearly marked paths so trampling of plants is at a minimum. Any areas where there could be disturbance of the wildlife, absolutely no dogs allowed. There should be off-leash areas for those that can't live without them and these need to be fenced for obvious reasons. I feel strongly that we don't need to pander to a small, vocal and, at times, obnoxious minority.

Furthermore, because the government is so shorthanded these days, picking up after dogs is a waste of money and time. Perhaps you could instigate a penalty system. After a certain amount of litter, the area is closed to dogs for a certain amount of time. In other words, make the dog owners responsible for their dogs litter.

Thank you for your consideration

Correspondence ID: 4518 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Enable professional dog walking and align any professional dog walking

rules with county or city regulations.

Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Charlie Lyss Colusa, CA 95932

Correspondence ID: 4519 **Project:** 11759 **Document:** 38106
Received: May,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I am writing in support of the Draft Environmental Impact State-ment for Dog Management in GGNRA.

My grandchildren have not had access to the beach at the tidal entrance to Crissy Marsh due to excessive dog use in that area.

My grand-daughter, then age 7, stepped into dog feces hidden in the grass of Crissy Field. I would like to see the future dog area on Crissy Field fenced.

Having recently walked at Mori Point, I have seen how leashing can control and protect habitat and humans. I hope similar management will happen through out the GGNRA in the future.

Sincerely, Nancy Ream (Mrs. James Ream)

Correspondence ID: 4520 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

Thank you for the opportunity to provide input to the Draft Environmental Impact Plan/Statement regarding the Golden Gate National Recreation Area.

I have been a resident of the San Francisco Bay Area for 34 years. I have lived and worked in San Francisco, Contra Costa, and Sonoma Counties. I have extensively explored and enjoyed the natural and recreational resources in this highly urbanized metropolitan area. In particular the natural and recreational resources of the Golden Gate National Recreation Area are a major reason I choose to live in the Bay Area.

The biggest failure is the disconnect of the DEIR proposal to the geographical context of the GGNRA. Within 40 to 50 miles of the GGNRA headquarters at Fort Mason are millions of people and probably hundreds of thousands of dogs. The GGNRA is not Yosemite NP or Yellowstone NP. Reading the document one is left with the impression that the GGNRA is a wilderness area, and not a part of the urban parklands in the San Francisco Bay region. The DEIR needs to reevaluate its conclusions and plans in this context of an urban parkland in the San Francisco Metropolitan Bay region. The DEIR needs to reconsider and address the relationships of natural and recreational harmonies in a dense urban context.

Without this reconsidered context the DEIR's implied impacts and recommendations are not based in scientific analysis. Conclusions are based on an inaccurate assessment of the actual overall conditions of where the GGNRA exists. The uses of the GGNRA are wide ranging in an urban context. Special events (i.e. Fleet Week, Bay to Breakers, major Golden Gate Park events) are given less emphasis as to adverse impacts to natural resources than alleged canine impacts. There is no specific sited scientific studies or analysis. The DEIR need to address these issues.

The Environmental Consequences (Section on Special-status Species) in Chapter 4 is inadequate because it fails to provide adequate scientific evidence connecting dog-related activities with impacts on snowy plover populations or other wildlife populations. Are documented snowy plover populations nesting or resting, and no site-specific scientific evidence is given to the impact of canine interactions? I applaud and support protection of endangered species. But, are interaction impacts between dogs and the endangered actually more or less significant than other activities in the GGNRA. No comparative evidence or analysis of varied activities is addressed. Do we cancel Fleet Week activities because masses of spectators inundate nesting or resting sites or impact other wildlife? The DEIR gives no comparative analysis or evidence to these varied events and activities and there impacts on wildlife occurring in the GGNRA. The DEIS should be revised to provide such analysis and evidence.

The Section on Special-status Species is inadequate because it fails to disclose and consider the scientific controversy related to the impacts of dogs on wildlife, as compared to other major events occurring in the GGNRA. This failure demonstrates a bias of the DEIS authors and should

be revised to include this information in order to provide a balanced description of impacts to decision-makers.

Given the lack of scientific evidence, analysis, and improper site context, I do not support the "Preferred Alternative" of canine related impacts on their presence in the GGNRA I support Alternative A, the No Action alternative and would also include the "New Lands" areas in San Mateo County. The DEIS is biased against the No Action alternative and failed to take a good look at this as an option.

There are many areas in the GGNRA where the 1979 Pet Policy has been working and where sensitive species are not present and conflicts occur infrequently or not at all. Ways of improving how GGNRA carries out/administers the current 1979 Pet Policy should be considered and given a fair assessment.

The existing 1979 Pet Policy management plan is a good plan. It addresses the natural and recreational values of the GGNRA, and it embraces the original intents in of natural and recreational assets in the GGNRA, an URBAN National Park.

Improved signage, education, and community involvement, (already a goal of the existing dog management plan) can rectify present day conflicts, which arise. The current "No Action" plans only needs improved signage and mapping that will go a long way to improve the natural and recreational assets of the GGNRA.

The GGNRA offers unique outdoor recreation resources to urban residents with dogs. The document needs to recognize, acknowledge and describe the important benefits to human and canine health the GGNRA provides, and therefore contributes to the health and well-being of all bay area residents and its natural beauty.

Over the many years I have enjoyed and explored the GGNRA I have never witnessed a serious encounter between people with their dogs and the native wildlife. Dogs may chase birds for a while, but I have never seen a dog catch a bird. Nor have I seen an owner encourage the behavior. Generally I have witnessed dog owners intervene, restrain and discourage their dogs from endangering wildlife.

I treasure my special human canine relationship and my access to unleashed areas of the GGNRA. My dog and I embrace the wonderful off leash opportunities the GGNRA affords us. We visit and partake of these experiences on a weekly basis. I expect my dog to be well behaved and responsive to voice commands on leash and off. I leash my dog to keep her from sensitive areas and clean up after my dog. As a dedicated

hiker/walker/bicyclist, I also educate fellow dog and non-dog enthusiasts about canine/human/bike interactions. On walks, I educate friends about the native plant/animal communities. In short, if you were to encounter me and my dog in the GGNRA, you would very likely have a positive encounter that would leave you smiling: her enthusiasm and joy for life are hard to match!

Thank you for your consideration.

Respectfully,

Steven Brooks

Petaluma, CA 94952

Cc: The Honorable Nancy Pelosi United States House of Representatives
235 Cannon House Office Building Washington, D.C. 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street, N.W.
Washington DC 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W.
Washington, DC 20240

Crissy Field Dog Group P.O.Box 475372 San Francisco, CA 94147-537

Congresswoman Lynn Woolsey 1050 Northgate Drive Suite 354 San
Rafael, CA 94903

Assembly Member Jared Huffman 11 English Street Room 15 Petaluma,
CA 94952

Congressman Mike Thompson 1040 Main Street, Suite 101 Napa, CA
94559

Correspondence ID: 4521 **Project:** 11759 **Document:** 38106
Received: May,12,2011 00:00:00
Correspondence Type: Letter
Correspondence: Subject: GGNRA Dog Management Plan Dear Mr. Dean:

I am a long time dog owner in San Francisco, and have for many years responsibly walked my dog at Ft. Funston and other lands belonging to GGNRA where off-leash dog walking is allowed.

I strongly object to the position of GGNRA expressed in its Draft Environmental Impact Statement that will greatly curtail dog walking on GGNRA lands. This is completely unfair. Under current laws we can only walk our dogs on a tiny portion of GGNRA lands. The new policy will restrict our use of these lands to the point where there will be almost no place where people can hike with their dog.

The EIS did not consider the cultural, recreational or social impacts of the proposed restrictions, or historic uses. The studies it quotes also did not establish dogs as a negative impact on natural resources.

I am against the "preferred alternative" of the EIS and every other alternative but the "no action" alternative.

Thank you, Andrew Moore San Francisco, CA 94110 cc: Supervisor David Campos Senator Barbara Boxer Senator Dianne Feinstein Congresswoman Nancy Pelosi

Correspondence ID: 4522 **Project:** 11759 **Document:** 38106
Received: May,13,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Dog regulations

Dear Mr. Dean, I live in the Marina district, one of the dog friendliest places I have ever lived. I walk my dog through the neighborhood everyday and all of the merchants and shopkeepers on Chestnut Street are always very welcoming. People stop from all over to pet my beloved American Eskimo and to say hello.

As a former horsewoman and a cat lover I had never known the magic and special bond that people described when talking about their dogs being their "best friends". Don't get me wrong, horses, cats and other animals are equally important but this dog means the world to me. He has been there through some very difficult times.

Chrissy Field is a special place where dog owners and dog lovers can allow dogs to run free. All around me at the beach, I see responsible dog owners carrying blue bags and picking up after their own dogs and making sure that other people are aware of their dogs. There is a special camaraderie between dog owners and a gentle, playful atmosphere amongst the beach enthusiasts with and without dogs.

I look around at the very limited access that GGNRA has provided for dogs and it saddens me that a group that is so defenseless and so dependant on the

kindness of humans needs letters like mine to remind you that the simple pleasure of running free on the beach can bring such happiness to man and his best friend. Please do not take that away from us.

Sincerely yours,

Mrs. Sheri Bargman

Correspondence ID: 4523 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

I have been a resident of San Francisco since 1976. I have lived next to the Presidio for most of my time here and have been very impressed with the Park Service's transformation of the Presidio from an army base into a National Park. I am an active environmentalist and am a member of the Sierra Club, the NRDC, and Earth Justice.

I believe that the GGNRA is an absolute jewel of a resource and is generally well run. I believe that the Presidio and the rest of the GGNRA should be managed, however, as urban parks and that their management should be guided by a set of principles tailored for urban parks rather than the principles that guide the remote wilder lands that comprise the bulk of the National Park system.

I am a dog owner and have been so for fourteen years. I run with my dog in the Presidio daily, most often along Crissy Field out to Fort Point. I also hike with my dog in those areas of the Marin Headlands that permit dog walking. Of course I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas. However, I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) are not based upon sound science or long-term monitoring of site-specific conditions.

As presented in the DEIS, the proposed dog management plan eliminates dog-walking (on and off leash) access for all new lands (additions to the GGNRA sometime in the future). The GGNRA's mission applies equally to new lands as existing lands; it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands as well as for existing.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it is not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so. In all my time at Crissy Field, I have seen very few incidents of dogs going beyond the fences that enclose the dunes or the marsh, and even fewer incidents of dog aggression. I have never seen a dog be aggressive to an adult or a child. With the many dogs that are there on weekdays, and the hundreds that are there on weekends, I think that is quite remarkable, and certainly does not justify the restrictions being put forth in the GGNRA's preferred alternative.

Many people have worked diligently both together and separately to study the DEIS and to make thoughtful comments on its findings, in hopes of encouraging the National Park Service to rethink and more carefully document its stance. The outcome of this plan will have an important effect on the quality of life for everyone in the Bay Area. I urge you to support Alternative A with individual consideration for any new lands, for the sake of the health and recreation not only of thousands of Bay Area residents and their canine companions, but for everyone who enjoys the GGNRA. Sincerely,

Stephen Koch

San Francisco, CA 94123

CC: Representative Nancy Pelosi Senator Dianne Feinstein Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director District 1 Supervisor Eric Mar District 2 Supervisor Mark Farrell District 3 Supervisor David Chiu District 4 Supervisor Carmen Chu District 5 Supervisor Ross Mirkarimi District 6 Supervisor Jane Kim District 7 Supervisor Sean Elsbernd District 8 Supervisor Scott Wiener District 9 Supervisor David Campos District 10 Supervisor Malia Cohen District 11 Supervisor John Avalos Mayor Ed Lee

Correspondence ID: 4524 **Project:** 11759 **Document:** 38106
Received: May,13,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear. Mr. Dean

I am strongly opposed to your proposal to change the dog policy at Crissy Field/Beach and the rest of the GGNRA. Playing on the beach and in the water with your dog is one of life's great pleasures, as well as great, healthy exercise.

I have lived in the Marina District and Pacific Heights for the past 15 years and take my dog to Crissy Beach about once a week. I see families both with, and without, dogs coexisting happily 99.9% of the time. 99% of the time I also see dog owners pick up their dog's droppings.

There are far more dog owners than bird watchers in America. There may be 7 million bird watchers in America but about half of the U.S. population have a dog in their household, that is about one hundred sixty million people with a dog in their homes. Reportedly, 90% of the GGNRA is already off limits to dogs.

I understand that the GGNRA was meant to be a recreation area and not to be a National Park where restrictions and activities are more stringent. I also understand that the Presidio portion of the GGNRA was given to you with the proviso that dog walking would not be changed.

Therefore, it is extremely unfair and unjust to remove families and their dogs from playing at Crissy Beach. Thank you very much for your attention to this very important matter.

Sincerely yours, Alan Bargman, M.D.

Correspondence ID: 4525 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean

I am writing to express my concerns about the Draft Plan/Draft Environmental Impact Statement (Plan/DEIS) for Dog Management in the Golden Gate National Recreation Area.

Even though I am an Oakland resident, I visit Fort Funston with my partner and 2 year old dog every Saturday and Sunday morning. We keep a close eye on our dog and ensure that her activities do not have a negative impact on other users nor the environment. Her off-leash experiences at Ft. Funston have been crucial to her socialization and training. We have developed strong friendships with other Ft. Funston patrons and their dogs.

I read the draft plan and appreciate its intent to reduce user conflicts and promote the preservation and protection of natural resources. I also agree with proposed limitations on commercial dog walkers and would even understand a limit of the number of off-leash dogs per human. Nevertheless, I am disappointed that the preferred alternative for all 21 areas within GGNRA severely restricts or eliminates off-leash access and thereby fails to support a key part of GGNRA's mission: to preserve the natural and cultural resources, and scenic and recreational values, of the park. My weekend visits to Ft. Funston are fundamental to my recreation.

The DEIS includes many unsubstantiated generalizations about the negative impact dogs have on GGNRA's natural resources. I believe there needs to be more fact-based arguments to support this hypothesis. I witness more impact from human users of Ft. Funston: small children chasing birds and littering or "boot camp" participants destroying native vegetation as they run through the park. However I realize that leashing restrictions on children and joggers are not the answer but rather improved communication and enforcement of GGNRA rules. This same reasoning should apply to owners of off-leash dogs.

I have never witnessed the types of conflicts at Ft. Funston described in the DEIS, neither dog vs. dog nor dog vs. human. This could be attributable to the time of day I visit Ft. Funston but I believe Ft. Funston's location and topography make it uniquely suitable for off-leash dogs. It is not adjacent to a major neighborhood like Crissy Field in the Marina. Also, Ft. Funston does not have Crissy Field's diverse user-base (e.g. roller-bladers, cyclists and beach-goers). Therefore, I don't believe the same draconian restrictions that have been proposed for Ocean Beach and Crissy Field should apply to Ft. Funston.

I enjoy the natural beauty of Ft. Funston but mostly appreciate the ability to walk my dog there off-leash. If the proposed leash restrictions are imposed, I would no longer visit Ft. Funston.

Thank you for your consideration. Douglas Lee

Correspondence ID: 4526 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: New Dog Access Rules for GGNRA

Dear Mr. Dean:

There are few places in San Francisco where those of us, who for various

reasons cannot be around dogs, can avoid them. Dogs, leashed or not, are on every public sidewalk, in parks, stores and with increasing frequency, in restaurants and museums I recently had to leave an exhibit in the Legion of Honor after encountering a three-foot tall labradoodle wearing a service bib.

I walk Crissy Field most days of the week from the Golden Gate Bridge to the St. Francis Yacht Club and back. I am writing in support of your organization's plan to require leashed dogs on all sidewalks and paved roads in the GGNRA and limited, regulated off-leash areas as indicated on your Map 10, Preferred Alternative: Crissy Field. This plan appears to offer balanced solutions for dog owners, dog-less walkers and out-of-town visitors. I would love to take that walk without concern for free-running dogs while enjoying the protected plantings, wildlife and the amazing scenery.

I ask also that you develop more rigorous enforcement designed to keep dogs out of the public lavatories along Crissy Field. In spite of adequate signage, too many dogs are taken into the stalls or are lounging inside the buildings while the owners use the facilities.

Thank you for the work you and your staff have invested in developing protections for this extraordinary park and the experience of the users.

Sincerely,

Anne Mackenzie

Correspondence ID: 4527 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I have enjoyed walking on GGNRA lands for the past thirty years, primarily in the Presidio and at Crissy Field in San Francisco.

Eight years ago, I chose to live right next to the Presidio for its beauty, solitude and recreational opportunities. I walk my dog Max, mostly off-leash, twice or three times a day either on the trails in the Presidio forests (what's left of them) or down at Crissy Field. It truly is one of my favorite daily activities! Though I live in an urban area, exploring nature is extremely important to me.

ENVIRONMENT

I have long been an advocate of environmental and animal causes including the Golden Gate National Parks Conservancy, League to Save Lake Tahoe, NRDC, Yosemite Fund, Marine Mammal Center, San Francisco SPCA, and Friends of the River. As well, I truly do care about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas. The DEIS/Plan concerns me because it doesn't recognize that environmental values include both recreation and nature. Reading this voluminous document one is left with the impression that recreation and the environment are opposing values. The document fails to acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

As a responsible dog owner, I keep my dog under voice and sight control, clean up after him, and keep him out of fenced dunes and sensitive wildlife areas at Crissy Field. While my dog is active, when he's off leash he circles back and is well-behaved. Generally, I have observed that dog owners at Crissy Field are responsible and clean (thanks in large part to many strategically placed waste bag dispensers which are filled every day by Crissy Field Dog Group volunteers) and really do respect the "Wildlife Protection Area.". (SUGGESTION: The dunes on the Central Beach at Crissy Field are in great need of a higher, dog-proof barrier on the ocean side.)

The DEIS/Plan has a lot of undocumented assumptions including statements such as what dogs "could" or "might" do if dogs are off-leash. These are hypothetical claims and are not backed up by data. For example, this document does not provide a correlation that dog waste is affecting the water quality at Crissy Field.

I have some concerns about other recreational activities at Crissy Field that are not addressed in your DEIS: Do kids swimming in the lagoon affect water quality? Do humans impact the environment at the (almost) weekly airfield special events? How much vegetation is destroyed from these numerous special events? Are berms trampled? I have seen picnicking families, Kites and NPS tractors, etc. in the Snowy Plover WPA. It appears that there is a double standard here: you have a seasonal restriction for dogs but allow humans who probably cause more impact in this area than dogs and dog owners do. I am also concerned that bikers, hikers, etc. can contribute to soil compaction. Will the GGNRA measure the impacts of all recreational users? (SUGGESTION: Provide scientific data that includes and measures the impacts of all user groups.)

CONFLICTS

"Conflicts" mentioned in the document are unclear. I have observed more of a cooperative spirit than division between non-dog owners and dog owners

since the 2005 ruling. In 2004, or thereabouts, the whole dog off-leash ticketing scenario was beyond unpleasant. You could cut the tension in the air. My sense is that owners and their off-leash dogs at Crissy Field blend well with other user groups and add value to the overall recreational feel at Crissy Field.(SUGGESTION: Would like more clarity on "conflicts?". More transparency. Education for dog owners, joggers, kids and park employees alike could work well here.)

RECREATION

Having places where I can take LONG walks with my dog allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA we currently have, I am concerned that many dogs and dog owners will not have sufficient opportunity to exercise and recreate.

The Golden Gate National RECREATION Area was created with the fundamental purpose of providing open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. GGNRA parks are not remote wilderness areas, like Yellowstone or Yosemite, therefore they should not be governed by NPS's management policies.

SOCIALIZING

When you have a dog, it's easier for people to start a conversation. Strangers who would otherwise have little reason to speak to one another will stop and chat when dogs are present. I have made countless friends, and joined various groups, and learned about events, by having a dog. Tourists have approached my dog to get their "dog fix". Parents often ask, "is your dog friendly? Do you mind if 'Johnny' pets your dog?". Kids love to interact with my dog. I never could have imagined the enormous social benefits and sense of community from owning a dog; It's important to me and I value it greatly.

If my dog is leashed and we encounter another leashed dog, conversations rarely occur. With few exceptions, my dog when on-leash becomes protective of me, so it's best to pass by the other leashed dog quickly. The sad truth is, the social aspect of dog walking will be lost if leashes are required. And dog walking in San Francisco is enormously popular; one third of the population of San Francisco owns a dog.

MUST BE REMOVED FROM THE DOCUMENT

The compliance-based management strategy is very disturbing to me. Target the people not walking their dogs responsibly but leave the vast majority of

us alone.

CONCLUSION

In my thirty plus years of recreating around San Francisco, I have NEVER witnessed a major dog incident at Crissy Field or anywhere on GGNRA land. I have looked at The Dog Management Plan and studied the proposed changes for Crissy Field. I believe the CURRENT off-leash policy perfectly meets the recreational and social needs of both dogs and people. The Preferred Alternative fails because the amount of off-leash area is too small given the size of the population it serves and there is no technical or scientific basis to change your current dog management policy.

I have faith that you will revise the final Dog Management Plan, and greatly enhance a much needed off-leash dog walking recreational experience. Rather than defaulting to NPS rules, San Francisco has an opportunity to be even better, to break new ground, and lead the nation, with fresh solutions (including education, signage and environmental barriers) for a peaceful co-existence between people and dogs and the natural environment.

Sincerely,

Amanda Bryan

San Francisco, CA Cc: The Honorable Nancy Pelosi United States House of Representatives 235 Cannon House Office Building Washington, D.C. 20515-0508

Secretary Ken Salazar Department of the Interior 1849 C Street, N.W. Washington DC 20240

Mr. Jon Jarvis, Director National Park Service 1849 C Street, N.W. Washington, DC 20240

Crissy Field Dog Group P.O.Box 475372 San Francisco, CA 94147-537

Correspondence ID: 4528 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Letter
Correspondence: San Francisco Tomorrow Since 1970, Working to Protect the Urban Environment

May 11, 2011

RE: GGNRA Draft Dog Management Plan/EIS Support for Alternative D with additional comments attached

Dear Superintendent Dean:

Thank you for the opportunity to comment on the Draft Dog Management Plan/EIS.

San Francisco Tomorrow, an urban environmental organization, supports GGNRA in their effort to better serve their Mission and to enhance the urban park experience for a diverse and increasing number of park users.

While we support Alternative D, we strongly urge you modify your stated goals. These suggested modifications would increase your ability to enforce concepts you have proposed, better protect your important historic, cultural and natural resources, and increase the overall visitor experience.

San Francisco Tomorrow urges the National Park Service to modify Alternative D and include the following: : ? require all off-leash areas be enclosed to protect park users, wildlife and other dogs; ? limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats; ? provide more trails that are free of dogs (currently, only 1 trail in San Francisco will be available for those who do not wish to interact with dogs); ? limit dog walkers in the park to 3 dogs and to not permit commercial dog walking; and ? implement compliance-based adaptive management that requires at least 95% of dog walkers to comply with the new regulations.

Sincerely yours, Jennifer Clary, President Will you want to live in San Francisco ' tomorrow? 41 Sutter Street, Suite 1579 . Sae Francisco CA 94104-4903 . Recyded Paper

Correspondence ID: 4529 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

I am a senior and a home owner in San Francisco. I was introduced to Fort Funston even before moving to San Francisco in 1998, and thus have had the pleasure of walking in the GGNRA both with and without dogs for nearly two decades. At present, I walk with my dog Lily (she is a rescue and is, in dog years, way more senior than I) We walk primarily at Fort Funston and Crissy Field.

The Enabling Legislation

The significance attached to recreation is stated in the title and intent of virtually every document related to the transfer and use of the lands which provide the basis of the GGNRA, and memorialized in the naming of the lands themselves, the Golden Gate National Recreation Area. When Congress established the GGNRA, it was as a:

new national urban recreation area which will concentrate on serving the outdoor recreation needs of the people of the metropolitan region [with the objective] to expand to the maximum extent possible the outdoor recreation opportunities available in this region.(emphasis added) (H.R. Rep. No. 1391, 92nd Congress, 2nd Session [1972])

The use of the GGNRA for off-leash recreation was addressed specifically during the hearings before the U.S. House of Representatives, and dog-walking was an enumerated activity in the US. House Report (H.R. Rep. No. 1391, p. 4854, cited in a letter from Edwin J. Sayers, President, SF/SPCA to Superintendent Brian O'Neill, GGNRA, Aug. 16, 2000). The importance and legitimacy of off-leash recreation was reconfirmed by the GGNRA Advisory Committee in 1979.

Recreation and Exercise

The importance of recreation has not lessened in the intervening years. Rather, it has increased. From the White House to local initiatives, improving health and fitness is a high priority in an increasingly obese and unfit population. The National Park Service itself has introduced the Healthy Parks, Healthy People program, which was the subject of a well-publicized conference here in the GGNRA in April. Thus, the GGNRA should be and could be in the forefront of one of the most important initiatives to improve health in a national context, by highlighting and showcasing people exercising with their dogs in the GGNRA.

The people walking dogs in the GGNRA are engaging in a form of exercise now recognized as a compelling and effective route to better health. Research has shown that walking with a dog is likely to result in lengthier and more frequent walks than walking with another person or with a group (See, e.g., Marcus, 2008; and Brown and Rhodes, 2006.)' The health benefits of walking with one's dog in the GGNRA, widely noted by those who visit with their dogs, and those who come to see and walk with the dogs, are ignored by the Dog Management Plan.

The severe truncation of space and opportunity reflected in the GGNRA "preferred alternative" sends the wrong message regarding exercise, and

regarding off-leash recreation.

The GGNRA is failing to capitalize on the opportunity to recognize and support the value of walking one's dog as a means of maintaining fitness and improving health in an incremental, continuous and positive manner. With its present Pet Policy, the GGNRA is on the cutting edge of demonstrating and providing a venue for lifelong recreation and a multi-generational healthy life style. The GGNRA should be a model for healthy exercise in an urban setting, positive treatment of pets, and the creation of community in an urban context. This is a model to be replicated, not destroyed.

Community and Safety

As a senior and a woman, I applaud the GGNRA for providing what is at present a safe place to walk with one's dog. The GGNRA abuts a city of 800,000 people, and yet walking in Fort Funston, for example, is walking among fiends. Many others, both with dogs and without, walk in the off-leash areas, enjoying the neutral and very beautiful space (and often challenging weather conditions!), and creating community in this urban recreation area. In a culturally diverse social environment, as varied as the urban setting around us, a shared enjoyment of dogs and of nature creates friendships and new acquaintances. In a time of increasing alienation and focus on individual pursuits and technology, what a treasure areas such as Fort Funston and Crissy Field are!

Walking off-leash provides additional physical safety. Lily and I are not being pulled by each other, and thus there is less stress on and danger to our joints and our bodies. It is also a safe place to walk because the dogs have the space to meet or to avoid each other. And there is no issue of leash aggression because the dogs are off-leash.

However, the planned reduction of space which will corral the dogs and their owners into a tenth of the one percent of land now available, and the requirement to walk dogs only on-leash on trails will create a dangerous situation for both owners and dogs.² In a recreational use survey of Fort Funston carried out in 2000, it was noted that Fort Funston alone accommodates more than five percent of GGNRA visitors, but comprises less than 0.3 percent of GGNRA acreage.³ The reduction of space and access proposed by the Dog Management Plan is unnecessary and untenable, will lay the foundation for negative behavior and territoriality, and will destroy what is now a viable, valuable, and beloved national recreational resource.

Baseline data was not collected, and hypotheticals stand in for hard data

It is unacceptable that the Dog Management Plan, costing nearly a million

dollars and purporting to justify major changes to traditional off-leash recreation, lacks the most rudimentary baseline data. According to the Plan, "Visitation data on local visitors walking their dogs off-leash in the park are not available..." (Vol. 1, p. 23). Why not? And if not, then this plan, with its profound consequences to off-leash dog walking, is premature, for it is not predicated on even the most basic of demographic data. Similarly, access must not be removed on the series of hypothetical consequences run up the Dog Management Plan flagpole, to see who will salute them ("dogs "can potentially trample... vegetation..." (Vol. 1, p. 14); "dogs can be carriers of exotic plant seeds..." (Vol 1, p. 15), etc. Hypotheticals are not data, and dogs (and their owners) must not be blamed and exiled for "possible" or "potential" problems. This is unscientific and unfair. And it is disingenuous to roll out a list of every endangered or threatened species in the GGNRA, in order to slam off-leash exercise, which is presently permitted only in a minimal space and primarily in the most urbanized and heavily used areas of the GGNRA. Fort Funston, with Nike silos in the parking lot and gun batteries on, and fallen from, the cliffs, is not pristine wilderness.

Impact on the City

Surprisingly, the Dog Management Plan states that, "potential impacts on social and economic conditions [in San Francisco] would be highly unlikely to exceed a "negligible" threshold, and are therefore eliminated from detailed consideration..." (Vol. 1, p. 23). This is wrong, and has already been proven wrong. The effect on city parks and on continued ability to recreate on the limited open space in the urban Bay Area will be both profound and deleterious.

This was already graphically demonstrated by the half-day closure of Fort Funston on March 11, 2011, the day of the expected tsunami from Japan. On that Friday morning, Stern Grove in San Francisco was overrun by cars and by hundreds of people and dogs, as dog owners and walkers sought other sites for their daily recreation.⁴

The GGNRA comprises a large part of the recreational land in San Francisco; any plan proposing change in off-leash access must recognize and reflect the impact of such change in San Francisco itself, and must be considered in conjunction with the City.

Remove the Poison Pill

The "Compliance-based Management Strategy" is a poison pill, designed to permit arbitrarily and unilaterally ending off-leash recreation, without public input or objection. This is unjust. It is also unjust because those who are irresponsible, or who are deemed to be irresponsible, would decide the fate of off-leash dog-walking in the GGNRA. An equivalent situation would be

that if a sufficient number of drunk drivers were apprehended on the roads, the roads would be closed to all traffic.

The "Compliance-based Management Strategy" also works in only one direction: towards less off-leash space. There is no positive reinforcement, only punishment.

The GGNRA already has policies and penalties for those who break the laws. Use the law and punish the offenders. Do not punish the innocent for the faults of the guilty, and do not destroy a loved and valuable institution because some irresponsible people do not follow the rules.

The Solution

The solution is already partially in place. Retain the off-leash areas recognized in the 1979 Pet Policy. Reinforce and retain the benefits ' in exercise, in community, and in safe and healthy use of shared resources ' of the authorized and mandated use of GGNRA land for traditional recreation.

In addition, given the demonstrated importance and value of off-leash recreation in the Bay Area, and the clear need for healthy exercise in the population in general, designate and create new off-leash areas and trails in the new lands being added to the GGNRA.

Increase education about off-leash etiquette; work with the many groups that have already proved their commitment to both the GGNRA and off-leash activity; and reap the harvest of enlightened administration, good stewardship, and demonstrated respect for both the history of the GGNRA and for its future. Off-leash dog-walking is an established activity. The active and devoted group of GGNRA visitors who walk with their dogs respect the land, value the resources, and cherish the experience of walking in these small corners of the GGNRA.

Sincerely, Dr. Renee Ilene Pittin

cc.: Secretary Ken Salazar, Department of the Interior J on Jarvis, Director, National Park Service Christine Lehnertz, Pacific West Regional Director, NPS Senator Dianne Feinstein Senator Barbara Boxer Congresswoman Jackie Speier Senator Mark Leno Assemblymember Tom Ammiano Mayor Ed Lee Supervisor Scott Wiener

FOOTNOTES: Dawn A. Marcus, MD, Fit as Fido: Follow Your Dog to Better Health, IUniverse, 2008. Shane G. Brown, B.Ed., and Ryan E. Rhodes, Ph.D., "Relationships Among Dog Ownership and Leisure-Time Walking in Western Canadian Adults," American Journal of Preventive Medicine, Volume 30, Issue 2, Pages 131,136, February 2006. 2 The San

Francisco Animal Control and Welfare Commission held a hearing on this very issue, and heard from a number of animal behavior experts regarding the consequences of the "preferred alternative" on canine behavior. On the basis of expert input, the Commission recommended that the Board of Supervisors oppose the "preferred alternative." 3 Karin Hu, Ph.D., "Survey of Fort Funston Recreational Use", included in Opposition of Fort Funston Dog Walkers and San Francisco Dog Owners Group (SFDOG) to the Proposal to Close Twelve Acres at Fort Funston, unpublished, 2000. 4 "Tsunami warning triggers Stern Grove dog wave", West Portal Monthly, Vol. XXI, No. 111, March, 2011.

Correspondence ID: 4530 **Project:** 11759 **Document:** 38106
Received: May,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: RE: Dog Management Plan

Dear Superintendent Dean:

I am hiker, a birder, and a dog lover.

Although I love dogs (I am a dog person), I do not enjoy walking on trails where there is dog poop or dogs running wild.

Once unleashed, a dog goes where he/she will. I live along the estuary in Alameda and have problems with unleashed dogs and their waste in my yard.

The parks are everyone's yard and should be enjoyable for all, not just dog owners. In the Oakland Hills, there are often six or more dogs with a dog-walker. They take over the trails and force humans make way to accommodate them. Elders have difficulty in avoiding over-enthusiastic dogs.

I strongly urge that the parks be kept for people first, with fenced enclosures for dogs.

Thank you.

Correspondence ID: 4531 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Enable professional dog walking and align any professional dog walking rules with county or city regulations.

Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Darin Lyssl Colusa, CA 95932

Correspondence ID: 4532 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I am a 60-year-old native San Franciscan. I raised my family here. Now I hike extensively with my dogs all over the Bay Area, but most regularly at Ft. Funston. My family and I have enjoyed the close proximity of the open space and natural beauty for all of our lives.

I am vehemently opposed to the proposed Draft Dog Management Plan. The original deed which granted the land to the GGNRA stipulated that existing recreational activities be maintained. The 1979 Pet Management Plan confirmed it. In an urban area like San Francisco, this is crucial.

Allow me to introduce you to my neighbor, Martine. Martine is near 75 years old, originally from the Basque region of Spain, but has lived and worked in S.F. for decades. About three years ago, he had a near brush with death involving his heart. He recovered, lost 40 Ibs, and regained his strength. His recovery is directly related to walking his dog, Capone. Currently, he is a regular at Fort Funston. He walks, not on the paved path, but across the dunes! He uses a cane and his dog romps at his side. He is as hale and hearty as any 75 year old you'd like to see! This is what an urban recreation area is supposed to accomplish!

And we won't even get started on my own battle with cancer... NEPA specifically states that any policy regarding recreation must consider the impact on the human condition. This factor must absolutely be considered in any plan for the future. The Preferred Alternative Plan doesn't even come close. A story like Martine's must influence any final decision. You may rest assured there are many more like it.

I look forward to an adjustment in the final proposal. Sincerely,

Victoria Lansdown Cc: Senator Dianne Feinstein, U.S. Senate

Nancy Pelosi, 8th Congressional District of California House Minority leader, U.S. House of Congress

Ken Salazar, Secretary of Interior

Jon Jarvis, National Park Service Director

Thank you for your attention- Victoria Lansdown

Correspondence ID: 4533 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

My name is Laurie Berk. I have lived in San Francisco for about 19 years and, in that time, have enjoyed walking, running and playing with my dogs Casey (1992-2004) and Kylie (2005 ' present) in the GGNRA. In particular, I visit Crissy Field on almost a daily basis and I enjoy hiking in various places, including the trails above Rodeo Beach, with my dog. On occasion I have visited Baker Beach, Ocean Beach and Muir Beach, among other places within the recreation area. Being in natural spaces, and having those spaces preserved and available for recreation, is important to me. In the past, I have been a member of the Sierra Club, the Audubon Society and the World Wildlife Fund, have volunteered within the GGNRA, including participating in beach clean-ups, and consider myself a birder, environmentalist and responsible citizen. I am also the mother of two girls, now ages 18 and 16, and, along with my husband and dog, we enjoy the GGRNA as a family.

In addition to being a responsible citizen who picks up after her dog, keeps my dog under voice control or on-leash where required, and out of restricted areas, I also clean up litter on the beach and hiking trails as I am using them. Over the years I have also notified the park service about injured or dead wild animals and birds and about people I have observed failing to observe regulations, such as staying out of fenced dunes and berms at Crissy Field. I have also helped provide and distribute bags to be used to pick up after dogs and have educated other park users about park policies, regulations and issues relating to dogs in the GGNRA.

As a responsible and involved citizen, I have followed and participated in various meetings and comment periods over the years relating to recreation with dogs in the GGNRA, including the planning process for the renovation of Crissy Field. Combined with my use of the GGNRA on almost a daily basis, I believe that I am fairly well informed and have personal experience relating to many of the issues addressed in the GGRNA's Draft Dog Management Plan /Draft Environmental Impact Statement (the "Plan/DEIS"). As such, I do not agree with the analysis or conclusions

reached in the Plan/DEIS and believe that they are biased against recreation with dogs in the GGRNA, not based on sound science or adequately disclosed information, and not based on long-term monitoring of the conditions at each site. I believe that with some minor tweaking and better management, the current 1979 Pet Policy would serve all interests and interest groups well into the future.

In my view, the focus in the DEIS only on the presence of dogs and only on the sites specified in the Plan/DEIS (rather than the GGRNA as a whole) inevitably leads to the (what I believe are erroneous) conclusions in the Plan/DEIS that dogs may have a negative impact on the sites. However, the proof is missing from the Plan/DEIS that these negative impacts actually exist, and those conclusions are unsupported. In fact, there are many factors that may negatively impact the natural resources or lead to conflicts within the GGRNA, including the presence of people on foot, on bicycles, on horseback and in cars, predatory wild animals and pests, non-native and invasive plants, litter and pollution, and the wind, rain and tides, to name a few. To the extent that natural resources are threatened, it is very unclear that dogs create the singular impact that poses any threat.

Additionally, the degree to which an impact is negative is maximized when one looks at very specific sites. If one looks at the GGRNA as a whole, however, and not merely at specific sites comprising the less than 1% of acreage where people may enjoy recreation with their dogs under current policy, any impact is minimized. In my experience, the natural resources I see in the GGRNA have not been diminished over the years that I have enjoyed being in the GGRNA with my dogs. In fact, the natural resources at Crissy Field in particular have been enhanced over those years through plantings and management of specific areas, and natural vegetation appears to be thriving, despite the heavy presence of people enjoying the space with their dogs.

It seems patently unfair to divide up the existing specific sites for dog recreation into anything less than what exists under current policy, as the 1979 Pet Policy surely was a negotiated plan, the end result of which only small, discreet areas of the GGRNA is available for recreation with dogs. Why should just those previously determined sites be the only areas under consideration? I understand that the GGRNA includes 60 miles of waterfront between Marin and San Francisco Counties and that only about 8 miles of it in total, and less than 1% of all GGRNA acreage, is included in the 1979 Pet Policy. If restrictions from the current policy are to be imposed on any of these sites, and the GGRNA is truly interested in "doing what is fair" as you have stated over and over in the media, the Plan/DEIS should provide for at least an equal amount of space for dog recreation in other areas of the GGRNA.

Further, many other actions, other than significantly restricting access with dogs, can be taken to ameliorate any negative impacts. These include accurate and informative signage, public education, proper enforcement (of all GGRNA rules, including prohibitions against littering and humans not staying on paths and out of protected areas), and the installation and maintenance of barriers around protected areas. I believe the GGRNA has exacerbated the potential for conflicts and rule violations relating to dogs in the GGRNA by not making the rules clear, by not maintaining barriers on protected areas, by acting without proper process, by allowing large scale and often improperly managed events in the GGRNA, and by failing to adequately enforce the rules and regulations. In addition, the GGRNA has encouraged an increased use of the areas covered by the 1979 Pet Policy by people, for example, by allowing the placement of the "temporary" Crissy Field Center at the beach and allowing food service there in addition to allowing various events, thereby increasing the usage of the GGRNA but not increasing enforcement, so that natural resources have a greater tendency to be negatively impacted. The expansion of picnicking areas near the East Beach of Crissy Field that is currently ongoing is likely also to increase the use of the area by people who would prefer to not be around dogs. At the very least, it is clear that there has been plenty of opportunity for the GGRNA to take actions, other than restricting access with dogs, to ameliorate the impacts that are enumerated in the Plan/DEIS, but the GGRNA has failed to take such action in any meaningful way. There seems to be a patent unwillingness of the GGRNA to manage the situation in a way that preserves the integrity of the 1979 Pet Policy. Now the attempt to manage the situation, as provided in the preferred alternatives, is to restrict or remove dogs from the equation, but that is unnecessary and unacceptable.

Having the community of people with dogs who use and advocate for the use of the GGRNA with their dogs characterized, in effect, as rogues in the Plan/DEIS is offensive and not based on facts. Most of the controversy over the presence of dogs in the GGRNA has been created by the unilateral actions of the GGRNA in rescinding the pet policy in 2001, its failure to manage the areas consistent with making the policy work, and hostility on the part of GGRNA staff in dealing with people in dogs. My personal experiences have included having a ranger on horseback at Crissy Field threaten to shoot my dog if I did not put him on leash because the ranger's horse was agitated by my dog (although my dog was not antagonizing the horse and was under my voice control), and being threatened with arrest by another screaming park policeman if I did not leash my under-voice control dog as I entered the beach, without any explanation. (I then saw that there was a distressed sea lion on the beach about 100 yards away and I immediately left the beach with my dog.) What I see day in and day out in the GGRNA is a diverse group of people with dogs acting respectfully and responsibly. It is true that there are people who don't act that way, and they should be fined for infractions; they are not the majority and the population

of people as a whole who use the GGNRA for recreation with their dogs should not be punished for the bad actions of a few ' no more than access would be closed to people because a few litter or otherwise don't follow regulations.

To be sure, many areas covered by the 1979 Pet Policy are popular with various user groups. In my experience, those groups generally co-exist well in the park. At Crissy Field, the few conflicts I have observed have occurred on the rare "beach day" when it is warm, sunny and not too windy, typically on a weekend day. On most other days, however, people with dogs tend to be the majority and, on bad weather days, often the only users of the area. With today's technology, I'd like to see the GGNRA try something along the lines of our Bay Area "spare the air days" where notice would be posted on those "beach days" online as well as at the East Beach of Crissy Field that would make the East Beach a dog-free zone for particular hours that day, such as from 10 am to 5 pm. Another alternative to consider is to restrict access to dogs on the East Beach of Crissy Field on weekends during specified hours, such as from 11 to 4 pm. These alternatives allow for all user groups to enjoy the space as they like it. With posted explanations of the policy, education and enforcement, I believe that conflicts would effectively be eliminated. Concerns expressed in the Plan/DEIS about the effects of pollution and disease in connection with dogs are not supported with facts or any scientific proof, and I challenge the GGNRA to provide evidence of these factors as impacts on the sites.

My use of the spaces in the GGNRA under the 1979 Pet Policy are extremely important to me as I try to stay healthy, both mentally and physically, and exercise responsibility for the health and well being of my dog. My daily visits to the parks are opportunities for peace and reflection and provide me with a treasured start my day. I have many friends who I know through my visits to the park. The ability to be in the open, allowing my dog to chase a ball and run into the water or to run at a faster pace than me, leaves me with a great sense of satisfaction and cannot be replicated elsewhere in the vicinity. Over the years, these recreational values have already been restricted, especially with the development of Crissy Field area and the lagoon and limits on access along the beach, so that I cannot enjoy running the same distances as I previously did with my dog off-leash, running at her own pace. Recreation with dogs should be acknowledged as a value in the Plan/DEIS by including a section that evaluates the benefits of such recreation. Some of the specific issues that I have with the Plan/DEIS, and the ways the Plan/DEIS should be modified to address these issues are as follows:

1. The GGRNA is an urban recreation area.

The DEIS and Plan do not acknowledge or recognize that the GGRNA is,

first of all, a recreation area, and second of all, in an urban setting. However, my understanding of the reason the GGNRA was created was to preserve the space for recreation purposes (including dog walking) to serve the Bay Area. The GGNRA is not a Yosemite or Yellowstone Park. The DEIS specifies that the quality of the urban environment is not significant to the study and is therefore excluded from consideration, but the reality is that the GGNRA is integral to the urban experience in the Bay Area and must be taken in to consideration. This is part of the "human environment" that should be covered in the DEIS. These facts, that the GGNRA is a recreation area and is in an urban setting, distinguishes the GGNRA from other spaces managed by the National Park Service, and the NPS's "fear" of setting precedence by continuing to allow recreation with dogs in the GGNRA is unfounded. The Plan/DEIS should include an evaluation of the benefits of recreation, including the physical, mental and social aspects of dog walking and what impact would occur to those benefits if severe restrictions are put into place.

2. Recreation and Natural Resources: Not mutually exclusive

The analysis and conclusions reached in the Plan/DEIS often present recreation and the protection of natural resources as an "either-or", or mutually exclusive values. This is a fallacy. The Plan/DEIS should recognize that people care about both values and that the natural resources can be protected and preserved at the same time that recreation, including dog walking, occurs. In fact, the presence of people in the GGNRA with their dogs may often enhance the natural resource protection by serving as eyes and ears against issues that arise and by being good stewards of the environment, including picking up litter and reporting injured animals, broken barriers and misuse of protected areas. In addition, there is no proof or evidence presented in the DEIS that dog walking under the 1979 Pet Policy has led to a serious degradation of natural resources. The Plan/DEIS should be modified to acknowledge that outdoor recreation is as important a resource as natural resource management within the GGNRA.

3. Improve Signage, Education and Enforcement relating to regulations and policies in the GGNRA.

The DEIS should include in its alternatives something along the lines of improving signage, education and enforcement relating to the current policies and regulations in the GGNRA, including dog walking policies. For instance, at Crissy Field there are no signs in the eastern parking lot area or along the beach or promenade that indicate that dogs may be off leash under voice control or what specific areas are included in that policy. Instead, the signs indicate that one must "obey all posted rules", but posted rules relating to dogs are few and far between and don't delineate where dog walking ' on or off leash ' may take place, other than prohibitions at the West Beach

boundaries. Near the West Beach Wildlife Protection Area, one sign says that dogs must be on leash in the "Snowy Plover Protection Area", without specifying that there is currently a 45 day period of time when dogs are allowed off leash under voice control. (That sign also states that one "MUST...recreate on the wet sand away from the upper parts of the beach...", but my understanding is that was a suggestion that was made (by Crissy Field Dog Group), but it is not part of the regulations in effect.) Further, a sign along the bridge over the lagoon indicates that Crissy Field is a resting area for the protected Western Snowy Plover, without specifying that the West Beach is preserved for that purpose (the sign makes it sound as though the threatened birds are trying to rest everywhere in the Crissy area.) In the headlands above Rodeo Beach, the signs do not include any indication that dogs are permitted, although there is signage relating to bicycles and horses. As a result, conflict occurs, people may unwittingly violate the policies, and people who may not want to deal with dogs don't have any information as to where they may go without dealing with off leash dogs (such as the West Beach area of Crissy Field). With respect to education and enforcement, people (including those without dogs) often don't understand the impact they may have by not staying on trails or by entering protected areas of vegetation, but once they understand the consequences (both to the natural resources and to themselves if they could receive a fine), they often will change their behavior. The GGRNA should be doing things now to make the current status work and the Plan/DEIS should include action plans relating to improved signage, education and enforcement.

4. Impact of "no action" is not properly or adequately analyzed.

The DEIS does not, but should, include a baseline of current conditions from which impacts can then be measured. Rather, it is compliance-based, without adequately assessing the impact or consequences of non-compliance. There is an assumption that non-compliance exists and has a negative impact, yet there is very little that is being done to make the current status work. Additionally, it is unclear how reliable the statistics are that are quoted in the Plan/DEIS about non-compliance, such as the one relating to off leash dogs in the restricted West Beach area of Crissy Field; were the stated observations made right after the restricted area was created and before there was adequate signage to notify people of the rule and before it was clear that the restriction was properly put into place? What are the statistics now that there is a fence and better (although not great) signage? I personally have not seen anyone with a dog failing to comply with the rules for the West Beach area since the fence was erected on the east end of that area. This relates to the previous point: education and enforcement are powerful tools which can solve many of the "issues" raised in the Plan/DEIS without severely restricting the current valued ability to enjoy the GGRNA

with a dog.

In addition, the ROLA compliance outlined in the preferred alternatives in the Plan feel draconian where the "baby is thrown out with the bath." There is no indication of how compliance would be measured and by what standards or who would measure it, and the consequences of non-compliance (for which there is not necessarily any or significant negative impact on natural resources) are rigid and biased. Change the Plan/DEIS to instead provide for management of areas driven by an adaptive management policy that assesses the impacts of non-compliance and provides regulation based on the impacts, with the ability to reinstate dog walking policies as previously enjoyed in areas where they may be restricted because of negative impacts if those impacts can be remedied. The current ROLA regulations in the Plan should be thoroughly revised to add clarity and allow for such flexibility and fairness to responsible citizens with dogs.

5. Conclusions that dog walking is the cause of negative impacts on natural resources in the GGNRA are unsupported.

With few exceptions, there is little documentation in the DEIS to support the conclusion that the natural tendencies of dogs harm natural resources and therefore have negative impact in the specified sites and therefore should be subject to severe restrictions. At the very least, other impacts must be considered, including the impact of other park visitors. There should be an analysis of a variety of uses regarding the impact on the quality of natural resources. I personally have observed and reported people climbing into fenced off vegetation areas at Crissy Field to take photos and to get better views during events, as well as children playing in the areas, running up and down the dunes. I have also observed people hiking off of the trails in the areas above Rodeo Beach and people on bicycles where they are not allowed. In addition, I have observed and reported large amounts of garbage and litter left behind after events, or not immediately picked up at the conclusion of the events, so that birds and other wildlife have foraged in the garbage, possibly ingesting harmful items. The dunes and fencing along the beach at Crissy Field are regularly impacted by the wind and tides. It is common for the park police horses to leave deposits along the trails in the park. I am really curious as to how the proposals for the America's Cup event (which I support) will impact the area and how that environmental analysis compares to the DEIS. All of these other impacts (and not just the ones I have listed as examples) must be evaluated as well before negative impacts are merely attributed to the presence of dogs.

6. Limitations on areas for recreating with dogs from the current policy is likely to exacerbate rather than ameliorate conflicts and the impact of usage in the smaller spaces.

While the DEIS reasons that "conflicts will likely escalate if not addressed in a comprehensive plan/EIS", the preferred alternatives in the Plan/DEIS are likely to lead to that escalation as the same population is forced into smaller areas and closer proximity. In any event, the environmental impact of that result has not been, and should be, addressed in the DEIS. In addition, the impact on areas surrounding the GGNRA, including city and county parks and open spaces should be considered.

7. Visitor Experience Should be Inclusive of Recreation with Dogs

The Plan/DEIS seems to focus on the "visitor experience" as one for people who don't want to be around dogs. However, not only are there people who go to the park with their dogs but there are people who go there without dogs to be around and enjoy interacting or observing the dogs. Usually the dogs are animated and happy in play and a great reminder that simple pleasures such as being outside in a beautiful setting is a treasure. I have met many people who have commented about my dog with joy at seeing her "smile", being a "good girl", or just because they think she is pretty or looks like she is having fun. It gives those people a wonderful visitor experience and that experience should be analyzed and acknowledged in the Plan/DEIS as well.

8. Diversity and Variety of People with Dogs in the GGNRA

The Plan/DEIS suggests that minorities don't visit the park or don't fully enjoy the park because of the presence of dogs, and that seniors, the handicapped and families with small children are threatened and intimidated by the presence of dogs. These suggestions are based on "studies" and "telephone surveys." The reality, however, is that many of the people with dogs in the GGNRA represent and include minority groups, seniors, the handicapped and families with small children. In particular, I often see families with young children and their dog playing and picnicking at the East Beach area of Crissy Field. The preferred alternatives in many of the sites would have a more negative impact on many in those groups as the restrictions to access with dogs would make recreation that much more difficult or impossible. For instance, if a family with small children or a person with a walker has to walk to the Central Beach at Crissy Field before allowing their dog off-leash, many of those people will not be able to enjoy a beach experience with their dog because they will not have access. Somehow the Plan/DEIS overlooks these people in its assessment of the situation. The Plan/DEIS should be revised to analyze the impact of severe restrictions on dog access on these park visitors.

9. Lack of Scientific Support for and Problem with other Limitations Provided in Preferred Alternatives for Crissy Field and Marin Headlands

Trails/Rodeo Beach

I also strongly disagree with other limitations that would be placed on dog access at Crissy Field and Rodeo Beach in particular. The additional limits on access in the grassy area, East Beach, West Beach and the paths to the Central Beach at Crissy Field, as well as in the Marin Headlands, especially along Wolf Ridge, are untenable and don't appear to be based on or supported by sound science or any long-term monitoring of the sites. How is it that walking a dog on leash along Wolf Ridge has a more negative impact than people walking along the trail, assuming regulations (such as picking up after a pet and not harassing wildlife) are followed? The Plan/DEIS needs to be revised to include real science-based information taken from long-term monitoring of the sites that is conclusive regarding negative impacts before restrictions on recreation with dogs are suggested or imposed. In addition, the limitations placed on the grassy area of Crissy Field in connection with events needs should not be open ended. As written, the GGNRA could potentially always have events planned in the area and the grassy field can, effectively, always be off limits to people with dogs. There should be limits placed on the number and frequency of the events if they are to cause limits on access with dogs.

In conclusion, based on my experiences and my reading of the Plan/DEIS, I support Alternative A, the No Action alternative. I also support the inclusion of "New Lands" areas for recreation with dogs as they are added to the GGRNA. Some tweaking of the No Action alternative may be helpful, including a prohibition of off-leash dogs during specified hours on the East Beach area of Crissy Field, as outlined previously in this letter, but basically the 1979 Pet Policy should continue to be the guide for dog management throughout the GGNRA. The reasonable solution for dealing with the issues raised in the Plan/DEIS is to educate the public, provide clear signage and to enforce the rules and regulations.

The Plan/DEIS is biased against the No Action Alternative and variations on that alternative. In my years of experience in the GGRNA, the 1979 Pet Policy ' which focuses on less than 1% of the acreage within the GGRNA - has been working with a few minor exceptions that can be addressed in ways other than severely limiting access to the GGRNA with dogs, namely, by better management. The Plan/DEIS does not provide site-specific information that these areas are negatively impacted by or are inappropriate for continued dog walking. Dog walking recreation in the GGRNA is important to me, my family and thousands of others and should continue to be permitted into the future at least as extensively as permitted under current policy.

Respectfully submitted, Laurie M. Berk San Francisco, CA

CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Senator Dianne Feinstein Senator Barbara Boxer Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Christine Lehnertz, Pacific West Regional Director of the NPS California State Senator Leland Yee California State Senator Mark Leno California State Assemblymember Fiona Ma California State Assemblymember Tom Ammiano San Francisco Mayor Ed Lee Supervisor Mark Ferrell of the San Francisco Board of Supervisors Crissy Field Dog Group

Correspondence ID: 4534 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I am writing as a 16-year resident of San Francisco (first the Outer Richmond, now the Outer Sunset). I'm also a passionate fan of national parks: my college thesis focused on William Kent, who donated the land for Muir Woods, and I estimate that I've visited at least three quarters of the national parks in the western United States. Living on the western edge of San Francisco, I'm a huge fan of and a very regular visitor to the GGNRA, from Fort Funston to Ocean Beach to Land's End to Crissy Field.

I am also a dog owner, which is why I am writing this letter. Off-leash exercise and socialization is essential for a dog's well-being. It's also essential for my well-being. I regularly run at Ocean Beach and Crissy Field with my dog. I greatly value the 1% of the GGNRA where dogs are allowed to run off-leash, and I am greatly troubled that the 1% may be in danger of vanishing. Specifically, I am concerned by the Draft Dog Management Plan/Draft Environmental Impact Statement for the GGNRA. The GGNRA's current preferred alternative places draconian restrictions, and in many cases completely eliminates, off-leash dog walking in many areas within the GGNRA. These alterations to the 1979 Pet Policy do not seem to me to be based on sound science, nor to provide a workable balance of public uses within an urban national recreation area.

I am particularly troubled by these aspects of the draft environmental statement: Lack of specificity. The plan assumes that negative impacts could occur from dogs but does not document actual negative impacts at specific GGNRA locations.

Unwarranted assumptions. The impact statement assumes that off-leash dogs harm shorebirds and stranded marine mammals but does not document specific negative impacts at specific sites. Ignoring the importance of

recreational use of the GGNRA. From its establishment, the GGNRA was charged with maintaining and protecting recreation as one of its four outstanding values. The environmental impact statement does not take recreation into account.

Bias against the No Action alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working. But the draft environmental impact statement mostly ignores the No Action alternative.

I am very cognizant of the fact that dog owners who use the GGNRA need to be good citizens. They need to have their dogs under voice and sight control at all times. They need to clean up after their dogs. They need to make sure their dogs do not bother other GGNRA users and they need to keep their dogs out of environmentally sensitive dune and vegetative areas.

But in turn the GGNRA must accommodate the reasonable needs of dog-owning recreation area users. Currently only one percent of GGNRA lands is open to off-leash recreation for dogs (and their human companions). To reduce that percentage further would be to disenfranchise a large part of the GGNRA's constituency, and thus undermine the very purpose of establishing an urban national recreational area. Yours,

Peter Fish

San Francisco CA 94122

Correspondence ID: 4535 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I strongly oppose the GGNRA's draft Dog Management Plan!

I strongly disagree with and do not support any of the alternatives that have been proposed! I strongly disagree with the compliance based management proposal!

As I sit here writing my "substantive" comment, I am looking at the 2000+ page draft Dog Management Plan. How do you expect the average person--and that's me!--to read this? Seriously. I tried...I really tried. I found so many things in this document that upset me...I had to stop. I could feel my blood pressure going up and I was getting frustrated and angry. Just the opposite of how I feel when I walk with my dogs off-leash (and under voice

control) at Fort Funston! Strange how that works.

I am one of many, who simply want to be able to continue to responsibly walk my dogs off leash as I have since the early 1980s at Ft. Funston.

Ft. Funston makes up less than 1% of the entire GGNRA. That means that over 99% of the GGNRA is available to other citizens who do not have dogs or who do not want to interact with dogs or dog people! The draft Dog Management Plan, as I understand it, intends to take away 90% of the 1%! That is unacceptable!

I know you don't want to hear any of this...you've made that very clear. I have attended meetings for years about off-leash dog recreation, including the meeting in the Presidio, in the rain. I signed up to speak and was never allowed to do so.

The fight to preserve off-leash dog recreation has gone on so long that my first group of dogs have grown old and died. My next generation of dogs have also grown old and died. I now have a third generation of dogs that I walk off-leash at Fort Funston. I too have grown old over these years and now am in my 60s. If I have to, I will advocate for a 4th generation of dogs and our ability to enjoy off-leash dog recreation within the GGNRA.

Here are some of my comments on this plan: You say you have to manage all "National Parks" alike. I don't believe that is true.

What other national park/national recreation area is within a city's limits that has a population of around 800,000 people and limited open space? I believe you do have the discretion to manage the GGNRA differently from Yellowstone or Yosemite.

It is my understanding that there is a mandate which requires the GGNRA to support recreation and mixed-use activities. I could find nothing in this plan which takes into consideration the great negative impact to the quality of life for those of us who live in the Bay Area and have Traditionally pursued off-leash recreation in the GGNRA.

I truly feel you are trying to keep people out of the GGNRA. One way to do that is to target a large group of GGNRA user--people and their dogs. Obviously dogs do not drive themselves to Ft. Funston, San Mateo, Marin or Crissy Field! We go to these urban recreational areas because we want to walk with our dogs off-leash (and under voice control).

I believe your plan is to make it so difficult and unpleasant to bring our dogs to these areas, that 've'll just stop coming. You've killed two birds with one stone-- you get rid of the dogs and the people. Ft. Funston essentially

becomes,deserted. After all, it's not the most hospitable place in the GGNRA.--extreme weather sees to that!

Once the people and dogs are banished, I expect that the drug dealers, criminals, homeless, etc. will return. When people and their dogs start regularly going to areas like the GGNRA, they become a much safer environment for everyone. When I started walking at Ft. Funston in the 80s...it wasn't that safe. As a single woman, I often was fearful--with good reason. Today I can safely walk in these areas--because more of us are walking there with our dogs. I didn't see the issue of personal safety within the GGNRA addressed anywhere in the Dog Management Plan.

As I said above, I have walked at Ft. Funston and Crissy Field since the early 1980s. I could not find any evidence in this report to back-up statements that dogs negatively impact wildlife or plants within the GGNRA. The 2000+ page report keeps using words like, "dogs might, dogs could, dogs could potentially" and so on. I've never seen so many "might-haves". I tried counting them, but eventually gave up because there were so many! I couldn't find an actual incident report anywhere in the dog management plan.

In over 30 years walking my dogs in the GGNRA, I personally have never seen a dog injure or kill a bird or other mammal. Just the opposite is true--wildlife in an urban environment are used to dogs. We have existed together for years. The Marine Mammal Center has said that they like it when people are walking their dogs on the beach, because we find the injured and stranded marine mammals!

Why haven't the fences and signs in the Bank Swallow protected areas at Ft. Funston been repaired? Perhaps that would have been a better use of the \$800,000.00 dollars allocated for the 2000+ page draft Dog Management Plan.

This report also does not address the important social communities that have developed over the years around recreational dog walking. We Watch out for each other, especially senior citizens and their dogs. I moved to San Francisco in the 70s. When I got a dog and started walking at Fort Funston I soon developed friendships that continue to this day. This is a huge benefit of off-leash dog walking in the GGNRA! The draft Dog Management Plan is written as though none of this is important or matters. A community of people will be destroyed.

I truly feel this is discrimination against a select GGNRA user group. People and their dogs are targeted by so-called environmental groups--whether they are native plant people, bird people, etc. We walk with our dogs in the GGNRA every day. We're highly visible, so it's become easy to blame dogs

for pretty much everything from erosion (forget about Mother Nature or just plain human impact) to dead birds found on the beach (no evidence it was a dog...but, we'll blame the dog anyway!). There are no credible scientific studies that support these allegations! I am asking the Park Service to recognize that off-leash dog-walking is a legitimate form of recreation.

I am asking the Park Service to recognize that off-leash dog recreation deserves more space within the GGNRA lands to continue this long tradition--not less space!

I support the original 1979 Pet Policy. I do not support any of the proposed alternatives or compliance based management! Jean Kind CA 94116

Correspondence ID: 4536 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Superintendant Dean '

I and most of the people I know (including dog owners) are very supportive of the efforts of the GGNRA to address this issue and are disappointed by the actions of groups such as the "San Francisco Dog Owners Group", "Ocean Beach Dog" and others.

I/we pray the GGNRA takes into consideration that the dog owners groups are bombarding dog owners with reminders to have input for the Dog Management Plan.

I feel that this is input is not balanced since there are so many people who have not had the time or had dozens (and I am not exaggerating) of reminders to address the dog management issue. Wildlife organizations (and I belong to several) have paled in the effort to encourage members to have input to the GGNRA on this issue. Please try to be balanced on this issue and take into consideration that you have so much input from dog owners because of so many dog owners groups are putting so much effort into getting owners to influence the GGNRA on this.

Attached is the *latest* email I received this morning. One of the many that I and others have been getting over and over.

Pleas note that the "San Francisco Dog Owners Group" refers to the dog management plan as "draconian", see attached.

(This is a nearly a duplicate to what I submitted on-line to the GGNRA site)

Dyer Crouch Pacifica, California 94044.

Correspondence ID: 4537 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My name is Amy Murata, age 36, I am a dog owner and a voting resident of District 5. I returned to my native California from 13 years living on the East Coast. I specifically chose to live and pay taxes in San Francisco because of the incredible lifestyle our beautiful city affords us. The most attractive feature of our city is the ability to share it with our canine companions. The ability to enjoy the Golden Gate National Recreation. Area (GGNRA) areas OFF-LEASH with my six month old. Boxer, Olive , is a key feature of the extremely high quality of life that me and other responsible dog owners in San Francisco enjoy. Olive, like the overwhelming majority of other dogs who enjoy the GGNRA off-leash is completely under voice control and serves as San Francisco's best advertisement for the great lifestyle in San Francisco.

I have wanted to get my own dog for over 10 years and I held off on doing so because I wanted to ensure that I lived in an environment in which my dog and I could thrive. I waited until I moved to San Francisco because the high quality of life offered by the off leash areas of the GGNRA and San Mateo County. My dog visits Fort Funston seven days a week and she also visits Crissy Field, Alamo Square, Buena Vista Park, and Duboce Park on a regular basis.

I'd like to take this opportunity make a few points in opposition to the Draft Environmental Impact Statement (DEIS) for a new Dog Management Plan as it is currently written. Of note, the DEIS is comprised of a shocking number of assumptions which are not supported by facts or evidence. Many of the impacts are simply assumptions of things that "could" or "may" happen. These are not fact-based examples. The overwhelming number of dog owners and dog walkers are extremely responsible for the actions of the dogs within their care and I have never witnessed an incident in which a dog owner/walker has ever caused harm or negatively impacted another fellow citizen's GGNRA experience. As a citizen, I would hope that a decision that would impact so many people and dogs would be based in facts. With regard to safety of other citizens who share GGNRA with other dog owners/walkers like myself, I would just like to highlight a misleading and flawed statement in the DEIS which erroneously suggests that eliminating off-leash areas within the GGNRA/San Mateo County would increase public safety. In fact, the data provided by GGNRA states that dogs account

for only 2% of serious safety incidents involved dogs. Of note, the vast majority of serious incidents involved people only, no dogs. If non-serious safety incidents are included, dogs accounted for only 7% of the incidents in the GGNRA.

Finally, I would like to say that a compliance-based Management Strategy cannot be part of any plan for the GGNRA.. Doing so would punish responsible dog owners like me and other voting dog owners for the bad actions of a few irresponsible owners. Further, I am also strongly opposed to Preferred Alternative because of its restrictive nature. There is no justification offered in the DEIS for major changes. I fully support the formalization of the 1979 Pet Policy AND off-lease access in San Mateo County AND on new lands acquired by the GGNRA.

We vote, own homes/businesses, pay taxes, and take responsible care of our dogs. Respectfully,

Amy K. Murata

Frank Dean, General Superintendent, GGNRA Secretary Ken Salazar, Department of the Interior Christine Lehnertz, Regional Director, National Park Service, Pacific West Region Jon Jarvis, Director National Park Service Nancy Pelosi, Member, U.S. House of Representatives Jackie Speier, Member, U.S. House of Representatives Diane Feinstein, U.S. Senator Barbara Boxer, U.S. Senator State Senator Leland Yee State Senator Mark Leno email copies sent to: Mayor Ed Lee Distric 5 Supervisor, Ross Mirkarimi fortfunstondog.org sfdog.org crissyfielddog

Correspondence ID: 4538 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Good Day!

The proposal is outrageous! It appears to be a government mandate not supported by the people!

I am a senior citizen, long-time federal and state tax payer, and a dog owner. I recreate with my dogs virtually every day at one of the numerous off-leash dog areas; almost every day we're either at Ocean Beach, Baker Beach, Fort Funston or Crissy Field. As a San Francisco resident since 1985, I feel very fortunate to live within 15-20 minutes of all these areas! These outings are important not only to my health and well-being but to the health and well-being of my dogs.

The Bay-area is paradise on earth. In terms of San Francisco specifically, it has many recreation areas for everyone to enjoy'it is NOT a pristine wilderness area. Fort Funston, for example, was once the property of the city of San Francisco and was given to GGNRA for more efficient management'it was NOT the intention to prohibit use by off-leash dogs and their people!

I wish I could believe that the environmental impact study will be objective, unfortunately I don't. I do not believe that off-leash dogs have a negative impact on either wildlife or the environment. Humans and the environment itself are likely to have a greatest negative impact on wildlife and the environment.

I was an on-staff dog trainer for the San Francisco SPCA for 12 years; I know for certain that restricting off-leash access for dogs will not only have a major impact on dog behavior it will have a major negative impact on local dog parks. I live just 1-1/2 blocks from Duboce Park and prefer not to take my dogs there because I feel now it's often overcrowded'limiting off-leash access will only make this and other neighborhood parks worse. Dog surrenders to shelters will go up as dog behavior issues increase as a result of neighborhood dog park over-crowding

Like the majority of dog owners I know, I respect property, the rights of folks who may be wary of dogs, wildlife (I socialized both of my dogs to horses because we were likely to encounter them on trails) and the environment (my dogs may dig at the beach, but are not allow my dogs to dig in grassy areas). I would prefer to see rules such as dogs with reliable recalls are given a certificate giving them permission to be off-leash. My dogs are trained to come when called even under the most distracting conditions. Although I am a dog trainer reliable recalls are easily achieved by any dog owner.

My individual opposition to the proposed restrictions is confirmed by San Francisco's Board of supervisors, the San Francisco SPCA, San Francisco's Animal Care and control and of course, every dog advocacy group in the area.

While I am a law abiding citizen with respect for my government, I also believe the government should not out rule the will of the people. If, in fact, the environmental study conclusively shows that as a result of being off-leash, dogs (alone) negatively affect wildlife and the environment I would be more than willing to work with GGNRA (on a gratis basis) to establish requirements/rules for owners who would like the privilege to walk their dogs off-leash.

Respectfully,

Shirley Donovan

Correspondence ID: 4539 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Enable professional dog walking and align any professional dog walking rules with county or city regulations.

Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan: (here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely,

Katherine Casassa San Francisco, CA 94107

Correspondence ID: 4540 **Project:** 11759 **Document:** 38106
Received: May,10,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Margaret Ryder, age 67, former City College instructor, now retired. I have lived in San Francisco for 40 years, and have owned my home in the West of Twin Peaks Area for over 30 years. Since owning my home, I have had a number of active and well behaved and well trained dogs. Being a responsible dog guardian, I have always kept my dogs under voice control and in my sight when walking them in any area where they are off leash. At Fort Funston, where I walk my three dogs frequently, I have always cleaned up after them, and kept them from passing into the fenced off areas.

ENVIRONMENTAL CONCERNS VS OFF-LEASH DOG AREAS

At Fort Funston , to the south of the large parking area, considerable areas have been replanted, and there the newly planted and developing areas are clearly indicated with environmental barriers. I find this very attractive, easy to see and respect. I applaud the work of those who have done this planting. As a concerned environmentalist, and a member of Sierra Club of many years, I am delighted to see this work which enhances and area and allows visitors to see sections of native planting take hold.

I might mention that at other areas of Fort Funston a number of years ago, fenced off areas (with dunes and iceplant) were fairly clearly marked, but currently the fences and signs are in poor enough shape as to be quite unnoticeable. Newcomers to the area can be excused for not "seeing" which areas to keep out of. I consider these folks to be uneducated rather than

irresponsible. Better fencing and better signage indicating the current off-leash areas is clearly called for to maintain and protect the environment.

EXERCISE AREA

I have trouble with the GGNRA's preferred alternative plan in that it severely limits and affects the off leash dog walking area at Fort Funston.

SAFETY

From the maps I have seen, the preferred alternative off leash area is bound by the large and always busy parking lot , steep cliffs and one paved walkway and one sanded path. Most of the day there are many dogs and walkers in that area now, but most of them are on their way heading to or from a longer walk. I am concerned that, if the number of dogs allowed to play off leash in that area, and that area only, increases hugely (as it will), the cliffs and the parking lot become major safety concerns. Furthermore, the sever crowding together of exercise-needing and excited canines becomes a safety issue too for both dogs and people. I feel that the DEIS has failed to analyze the impact of restricting the off-leash area at Fort Funston.

RECREATION and SOCIAL FACTORS for people

The GGNRA site at Fort Funston allows me and so many other urban residents the recreation that we need. Having increasing mobility problems, I try to walk frequently and purposefully as often as I can, and the hike from the Fort Funston parking area to the on-leash-from-here sign to the north (I don't know the name of that area; there is a lovely bench where one can fully relax for awhile and enjoy the view) makes a perfect distance. I do know, however, that I would not want to take that walk with two or three of my dogs on leash. I have large dogs, and at 10 1/2, 9, and 2 1/2 years old, their walking paces and needs are very different, and walking two or three of them on leash for a distance would be quite uncomfortable for me. (Fortunately, they are tired enough at the end of a walk to come to me happily and we walk on leash back to the car.) Also, my dogs actually need more vigorous exercise than I can give them on leash. The current availability of paved trail and off-leash running at Fort Funston perfectly accommodates the recreational needs of citizens of people like myself, and allows us to keep ourselves and our wonderful companions healthy and exercised. There is another social aspect to Draft Dog Management Plan that disturbs me. Our daily walks, necessitated by our dogs' need for exercise, also allow us to get out of our homes and socialize with others. One can, of course, avoid "chatting" with others, but at the same time and if one wants, it is always easy to begin conversations with other dog walkers. Always pleasant, often informative, never awkward....such encounters, even brief ones, help one feel less alone, less isolated. Indeed, most of the friends and

acquaintances that I have made since retiring have been made while pursuing canine activities. I treasure this aspect of my frequent dog walks. I trust I speak for many, many other SF residents that I meet daily.

What is true is that conversations are rarely if ever started between folks who have dogs on leash. For one thing, one doesn't know why a leash is being used. Is the dog aggressive? Is the untrained? Is the dog getting used to a new owner? Will dogs get defensive or protective? Will dogs tangle up if they are near? There are so many possibilities that folks with dogs are far less likely to approach others when there are leashes at work.

In May of this year, I attended an Open House put on by the GGNRA (at San Francisco State University), and had an opportunity to observe the plans for changes at Fort Funston. The allowable off-leash area currently available at Fort Funston perfectly meets the recreational and social needs of people and dogs alike. I feel that the "preferred alternative" choice that I learned of failed, seriously, to accurately analyze the need for residents of this urban area.

I trust that the GGNRA, in developing a general management plan, will take into consideration and respect the specific character and situation of the Fort Funston Area. I fully support Alternative A, the No Action alternative of the DEIS, as it relates to Fort Funston.

Respectfully,

Margaret Ryder

San Francisco CA 94127

copies sent to: Secretary Ken Salazar, Department of the Interior
Christine Lehnertz, Regional Director, National Park Service, Pacific West Region
Jon Jarvic, Director National Park Service

Senator Lelan Yee Senator Mark Leno

email copies sent to: Mayor Ed Lee Distric 7 Supervisor, Sean Elsbernd
District 8 Scott Wiener

fortfunstondog.org sfdog.org crissyfielddog

Correspondence ID: 4541 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Letter

Correspondence: Re my response to the proposed dog management plans at the Presidio and other parks.

I am a volunteer park steward in the Presidio. I volunteer at the Presidio Park Stewards program, the Native Plant nursery at the Presidio and the Presidio tree volunteer program.

I am also the owner of an eleven year old black lab named Felicity. I take hikes with my dog regularly in open space areas on the peninsula and elsewhere.

I have volunteered at the presidio regularly since my retirement from State Service in January 1999.

I was a licensing program analyst and I graduated from Santa Clara law school.

As a volunteer at the presidio I have seen many professional dog walkers with up to six dogs sometimes more. One time I counted 10 dogs with one walker who were walking off leash. I recommend that the professional dog walkers need some form of regulation or licensing. There needs to be a place where we can all walk our dogs in a safe place that is fenced but the dogs are free to run off leash.

At the same time I believe that all dog owners and dog walkers have to respect our Natural Resources. We all must remember that this in a National Park area we are talking about. There are many biological sensitive areas and native plant sensitive areas that dogs need to be controlled in. There is a real conflict developing with the staff at the National Park and Presidio Trust and the dog walker community. I recommend that a standard be established doggie clean up bags need to be provided free of charge at locations where dogs are welcome. I also recommend that staff and volunteers receive training in the dog policy. There will need to be enforcement of the dog policy when it takes effect.

Dogs are not appropriate for the Crissy field wetland area. Dogs need restriction at the Baker Beach area. I agree that it is appropriate in the Southern portion of Baker beach that dogs are allowed to run off leash as long as they are trained to be friendly to humans and are under voice control. This can be a fun area I'm thinking of the dog beach area at Carmel, California. The area north of the sand ladder on Baker beach dogs should be on leash only.

Re Muir Beach I have walked on guided walks on the Muir Beach trail which goes up the hill toward Muir Woods State Park. I have also been on a guided tour of the Tennessee Valley project. I recognize the importance of

the frog habitat and nesting area for birds and the future Salmon and possibly steel head trout areas near the wetland adjacent to Muir Beach. Given these sensitive areas I recommend that dogs be restricted to on leash only at Muir Beach. I recognize that this is a major change for the use at Muir Beach but the change has been taking place for years. Muir Beach is transforming to a wonderful Natural Gem and we must respect the sensitive nature of it. I do not think it is appropriate for dogs to run off leash at Muir beach because they will disrupt the shorebird population and frog population that I suspect will return.

Respectfully Submitted. John E. Shea

Cupertino, California 95015

Correspondence ID: 4542 **Project:** 11759 **Document:** 38106
Received: May,11,2011 00:00:00
Correspondence Type: Letter
Correspondence: John H. and Jean R. Maurer, CA 94608 May 5, 2011

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

Regarding the Dog Management Plan/Draft Environmental Impact
Statement for the GGNRA

Dear Superintendent Dean:

I am writing about the draft Dog Management Plan and Environmental Impact Statement (DEIS) for the Golden Gate National Recreation Area. I love the GGNRA, but I'm concerned about the impact of dog-related recreation on the wildlife, habitats, and other park users at the park.

Please improve the plan to make it safer for wildlife. Here are some of the ideas I'd like to see in the plan:

1. All "Regulated Off-leash areas" should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. (In this case they should be well marked to provide a clear boundary for off-leash activities.) Fences provide more security for all park users. This is a National Park. People come from all over the world to visit the park Some of these users don't wish to interact with dogs. It would also help dog owners be aware of how to comply with Park rules.
2. The Park Service's proposed requirement of 75% compliance is too low. The Park Service should require a minimum of 95% compliance or should initiate measures to improve compliance.
- 3.

Commercial dog-walking should not be permitted in the GGNRA. As I understand it, such a commercial activity is against the law in National Parks. It is also very disturbing to wildlife. 4. At least some trails in San Francisco should be entirely closed to dogs. Under the current plan, nearly every trail in San Francisco is open to at least on-leash dogs, meaning no trails are available for people who prefer to enjoy the outdoors without interacting with dogs. Again, people from all over the world use this park, and some won't want to interact with dogs. We want visitors from other countries to be pleased with the park. 5. I love dogs. While dogs are important parts of our families and communities, they have a significant negative impact on thousands of other animals and plants that rely on the park to survive. They also have a negative impact on human visitors. The parks should be maintained to be safe and accessible for all users and to protect their natural and cultural resources for future generations.

Thank you for considering my input. Please do adopt measures that will help visitors enjoy the Park's features and will protect the GGNRA's irreplaceable resources for current visitors and for future generations. John and Jean Maurer

Correspondence ID: 4543 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 14, 2011

Dear Superintendent Dean,

I am in agreement with a large number of Marin resident who want to keep Muir Beach dog friendly. We implore you to consider our interests and the efforts we are making in expressing our thoughtful ideas on this matter, rather than disregarding us, as is so often the case with GGNRA proposals. We live here and an important part of our recreation as well as our dogs' involves allowing them the access set forth in the plan below which can also be viewed at: keepmuirbeachdogfriendly.com Please read it and give it your earnest attention and consideration. A Plan for Everyone In response to the NPS Dog Management Preferred Plan, we propose the following alternative plan:

- Muir Beach: Adoption of Map 5A which allows continued off-leash beach access for dogs
- Trails: Adoption of Map 7A, which maintains the dog-friendly Coastal Fire Road and Trail adjacent to Muir Beach. In addition: - we request an additional dog-friendly access of the Coyote Ridge Trail to Miwok Fire Road which would allow hikers with dogs to cross from Muir Beach into Mill Valley.
- A dog litter bag dispenser and waste receptacle

placed at the footbridge entrance to the area. Like many dog-friendly parks throughout the Bay Area, this is an effective way to encourage dog owners to pick up after their pets. - Increased signage and education efforts provided by NPS so that all visitors to these areas are aware of current rules and regulations

Specifically: - a large sign at the footbridge entry to the beach which clearly defines beach rules for all visitors. - signs placed at the lagoon and creek areas which forbid swimming, trampling on vegetation or disturbing wildlife in these areas Unlike an outright ban of one segment of the population, as is proposed in the NPS Preferred Alternative D, these efforts serve to educate and inform all visitors to the area, representing a true spirit of stewardship for the land. Additionally, these efforts will negate the need for costly reinforcement of new regulations.

Correspondence ID: 4544 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Deon,

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA. The Bay Area is a model for enlightened co-use of our natural resources. The availability of nearby areas for the tax paying dog owners to exercise their animals and maintain a healthy lifestyle is necessary for a balanced society. Dogs have been living with humans as helpers and companions for countless generations. To deprive this natural pairing of the opportunity to enjoy nature together would be a mistake with unforeseen consequences.

Correspondence ID: 4545 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

Re: the Draft Environmental Impact Statement (Plan/DEIS) for Dog Management in GGNRA

I live close to and have enjoyed the GGNRA in San Mateo County. I rarely get in debates about dog-walking uses of the places I used to enjoy walking; I just don't go there any more.

As a member of the usually silent majority, I would like to reclaim public

lands for the use of a wider range of people than what one currently sees.

On a human scale, it should be possible to walk with frail people or young children and not be threatened by large untrained dogs or their anti-social owners. It should be possible to walk along the beach or path and be unmolested.

From a physical resources point of view, it should be possible to prevent adverse impacts to coastal scrub, chaparral, and grassland plants and wildlife from uncontrolled destructive behavior by dogs. I would welcome any alternative by the GGNRA which keeps unleashed dogs away from park lands, and allows a minimal number of leashed animals on limited trails. Please record my support for Alternative D of the proposed plans.

Thank you. Sincerely, Elizabeth A. DeJamatt

Correspondence ID: 4546 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing this letter in response to the GGNRA dog management plan.

I am excited that we have land available for all to enjoy and recreate. Also, knowing that it will not be built upon and saved for future generations is commendable. I do thank all involved for that, however, the taking over of the many open spaces, now has restriction imposed by the rules of government. The rules do not allow for the recreation of all, because some of us like to walk, hike and run with our dogs off leash.

In the areas where parks are adjacent to neighborhoods and especially those with large populations of people like San Francisco and neighboring towns, our rights are being taken away. Where are we going to let our dogs roam through the waters of the beaches and bay? Where do we let them socialize with other dogs? Where do we go to let them sniff the great outdoors off leash? I am sorry some of the tiny dog parks created is not satisfactory. (There is one in San Mateo with only dirt, no trees, bushes or grass, very unattractive.)

We must not take away the off leash at Crissy Field, and Fort Funston. Maybe we can compromise and have a set time of the day where off leash is allowed. I know there are areas in Santa Cruz that have parks and beaches with times allowed for off leash. At Mori Point, I understand due to the endangered species, but what about at the top of the mountain and towards

the Rockaway hills, let's make that an off leash area.

It is not OK, to just take over land with out the consideration of the people living right next door. We are not a nation of dictators. The population is just going to increase. Pretty soon at this rate, I see all of us living in a bubble. Great, we have all this beautiful land, but can't use it. We must begin to think of Co-existence.

Please consider my comments, thank you for your time.

Sincerely,

Michelle Pitt and Dale Pitt

Correspondence ID: 4547 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Frank Dean,

My name is Sara Shaw, and I am a volunteer with the National Park Service at Mori Point. I have come several times to work on the trails, including planting native plants and weeding invasive species. I was one of the 2000 volunteers who planted native species on the hillsides as part of the National Day of Service on Martin Luther King Day a few years ago.

Today I came back to Mori Point to enjoy the fruits of all our collective labors. I was appalled to see that the few people who were in the park were people with dogs and all except one person had their dog or dogs off leash. I arrived at the entrance to Mori Point at the Fairway Drive trail, and it reeked of dog feces. There was no visual evidence of dog feces, but the excrement must be hidden among the plants.

I am writing you today in defense of whatever measures the NPS will do to support the immediate withdrawal of dogs from the area. I have worked hard right along with the National Park Service to restore Mori Point to its former beauty, and I am proud of the progress so far as seen by the beautiful wildflowers at the top of the Bootleggers staircase. There were beautiful birdsongs coming from the trees and I greatly enjoyed hearing them sing. Then suddenly a dog barked from on top of the hill; which disturbed my solitude.

I know there have been negative comments published in the Pacifica Tribune regarding the dog policy, but the "dog people" act as if they own the place, and they have the audacity to let their dogs go into the plants. When

we are told to stay on the trails, I believe that includes dogs. I am supportive of dogs ON LEASH, but only as a secondary appeal to the dog owners.

I understand the issue that they feel they need a place to let their dogs roam around and be dogs. Dogs are allowed on the beach at Pacifica State Beach. But, the dogs are out of control, and have prohibited the Western Plover from reproducing in Pacifica State Beach. I am also a volunteer at Pacifica State Beach, and hope that something can be done to control the dogs there too.

In closing, I am hoping that you will prohibit dogs from entering the Golden Gate Park National Recreation Area. National Parks, county parks and state parks do not allow dogs and I feel that dogs should not be allowed at Mori Point either. Thank you for the opportunity to submit my comment.

Sincerely,

Sara Shaw Pacifica, CA 94044

Correspondence ID: 4548 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am aware that we are supposed to address the "off leash report" by page and paragraph. However I am sure that this has been done by many people, people who have gone through the 2000+ page report and that they have pointed out every error, misjudgement and misconception.

I would like to put a human and canine face on this issue. No one is saying there are not problems with dogs being off leash but I think the few problems do not justify punishing the majority, and I feel Sebastian and I are part of that majority and this is our story.

Sebastian was adopted through Norcal Golden Retriever Rescue almost 7 years ago..He was a 5 year old who was turned over the the Peninsula Humane Society with the request that he be put down because of bad health. At the time his weight was close to 130 lbs. When we got him he could barely walk a city block. I would walk him to the end of the block and then home. Eventually we walked to the neighborhood park and home. Then we would play ball in the park -yes- off leash which we were not supposed to do. But the weight wasn't coming off.

Then a friend introduced me to Fort Funston. I took Sebastian there but with some hesitation because the thought of so many dogs made me uneasy. It

was wonderful. Dogs and people were extremely friendly.

We started walking from the parking lot to the water fountain. Then we increased our walk to the beach access. Then to the end of the path. Then from the parking lot to the end of the path twice!

The weight melted off Sebastian. He was proudly walking, ball in mouth and within a years time he was down to just a little over 80 lbs.

For almost 7 years we have walked at Fort Funston almost everyday- rain or shine. Only the really heavy winds with the flying sand stops us. Since I retired 5 years ago we often walk there twice a day.

We have seen problems, this cannot be denied by life without problems is an impossible dream. The majority of problems are people related. There is the occasional dog fight but those are usually a lot of noise.

Yes dogs do run in the fenced areas but in all fairness the fences are almost non-existing. And in reality the area is sand dunes. The majority of the damage to the plants is done by sand.

Sorry, I got off subject. It is my hope that Sebastian and I can continue to walk at Fort Funston until he can no longer walk. We still walk everyday, and still somedays twice a day when I am not committed to my volunteer jobs in the AM.

We meet every afternoon with our "pack" - a small poodle mix about 5 lbs, a jack russell about 20 lbs, a mix breed about 50 lbs, a Golden mix about 75 lbs, a lab about 90 lbs and on the Weekends + holidays a Bernese Mountain Dog, 117 lbs! Occasionally other dogs join us as we walk.

During our walks we have seen many dogs chase birds. The birds, in all honesty, seem to be playing with the dogs. I have never see a dog catch a bird. We did see a bird caught in a tree and reported it using the yellow phone in the parking lot. We also seen dogs digging to try and get gophers but we've also seen people grab them and pull them away.

If Fort Funston changes, if the off leash areas are limited I think many problems will be generated.

We are in a heavily populated urban area. Dogs are a very popular family pet and we think of them as family members. It is important that they are exercised and like children, if they are not given release to their energy problems start. Children who are not allowed to play and release their energy cause problems - so do dogs.

If areas are limited at Fort Funston I think the "damage" that dogs do will seem minor to those caused by people without dogs. It is a fact that on weekends groups of younger people, without dogs, use Fort Funston for parties. Evidence of broken glass support this. Many Sundays + Mondays I have walked with a bag to put broken beer bottle pieces. Less people + dogs more parties - we are in an urban area with easy access.

If I were homeless Fort Funston would be a great place to live, even with the dogs. With out people and dogs - wow! Yes, you'd have Park Rangers there but the homeless are very good at finding niches, ask people who have walk at Fort Funston for a long time and you will hear stories about homeless camps. You think dogs cause environmental problems think of the problems of us humans can do camping, without permission or supervision.

What can be done to make Fort Funston remain the same? Could the areas that are supposed to be fenced be maintained better? Can the off leash areas be as they are now?

I would be willing to pay a parking fee or a use fee. I already pick up after my dog as well as pick up after those that don't. I think that for an urban park Fort Funston is one of the cleanest parks I've ever been in, thanks to people walking their dogs.

I would support limiting the number of dogs professional dog walkers are allowed to bring to the park. Most dog walkers are great but there are those that take advantage. Even I avoid the peak professional dog walking times. Again, a use fee would be good.

In conclusion, let me ask that you and some of your staff come out to Fort Funston some evening - around 5 PM - and take a walk. See for yourselves the great community that Fort Funston really is. It really is an amazing place. All races, all breeds, hang gliders, bike riders, children, and yes, birds and even bunnies, all co existing and having fun, which is why we call it, Fort Fun.

Thank you and I hope to see you at Fort Fun

Laura, Frank, and Sebastian James

Correspondence ID: 4549 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

My name is Eileen Cohen. I reside in Berkeley, Alameda County. For many years I have supported numerous environmental organizations, including NRDC, the World Wildlife Fund, Defenders of Wildlife, Save the Bay, Ocean Conservancy, and the Sierra Club. I have enjoyed walking my dogs at Fort Funston many times over the years.

As a long-time environmentalist and dog owner, I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA.

All users'including, of course, people without dogs'clearly have some impact on the GGNRA. But in the Draft Environmental Impact Statement, the National Park Service inappropriately singles out dogs. Its conclusions are not based on sound science or long-term monitoring of site-specific conditions.

Any impacts that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

Please remember that the GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral deTierra in San Mateo county).

Respectfully, Eileen Cohen

cc: Representative Nancy Pelosi, Minority Leader, U.S. House of Representatives
Representatives Ken Salazar, Secretary of the Interior Jon Jarvis, National Park Service Director Crissy Field Dog Group

Correspondence ID: 4550 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Letter
Correspondence: I am a GGNRA user, dog owner and past elected Director of the East Bay Regional Park District (EBRPD), and the Mendocino Land Trust. I have been directly involved in all aspects of the people, dog, wildlife issue in

California. The following is my summery view on how GGNRA should proceed.

Public support for the governmental infrastructure that manages a system is the first priority. In making decisions, the order of importance places people first. People will support with tax revenues what are closest and dearest to them. In my county, 2/3 of family units have dogs. Where beaches are closest to urban centers, dogs should be allowed off-leash. The fact of beach use by people and their dogs (on or off-leash) makes a bird refuge in or near the same space a bad idea. On the other hand in the far reaches, dog and people prohibition makes sense. Buffers between areas is desirable. A fence, is not my idea of an open space buffer.

In other words, balance is a must. In the EBRPD where there is an elected Board of Directors, and places like Carmel, balance, separation, and tax payer satisfaction has been achieved. Contrast Carmel or EBRPD policy with the California State Park system which is constrained by an administrative law adopted decades ago, and administrated basically by State law inforcement officers. The State bans dogs everywhere leashed or otherwise. From personal experience there are few if any ways to influence the State system. As a result of fines for using public parks and beaches, the State system has lost public support. The end result is that the fined park users are petitioning their elected officials to reduce or better yet, eliminate funding for the State Park System! And it's happening.

Balance in park use is a function of government. It is important and necessary. Times are tough economically and politically! GGNRA in my opinion is at risk in both areas. While I truly love and admire those that advocate for the unrepresented wildlife, the place for wild life must be in the wilds, and near wilds. The compromise is for off leash dog use on the urban beach.

The "greater public good" was decided long ago when the coastal urban areas were developed. Restricting people from Off-leash dog use on urban beaches is 1) wrongly attempting to undo the impacts of the "greater public good" , and 2) Does not benefit either GGNRA or the wildlife in the broader picture.

Lynn (Leonardo) Bowers Past Director EBRPD

Correspondence ID: 4551 **Project:** 11759 **Document:** 38106
Received: May,13,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

I am writing in response to the Golden Gate National Recreation Area's Draft Environmental Impact Statement (DEIS) regarding the Dog Management Plan. I do not support any of the alternatives presented, other than the "no action" alternative. Following are my reasons for this position.

First, let me say I am an avid environmentalist. I have spent my entire career in conservation, working for an organization whose mission is the preservation and enhancement of California's coastal resources, as well as the promotion of public access consistent with that goal. Having been in this position for many years, I have experienced what can happen when human and resource needs are not adequately balanced. As much as I would have liked to have seen public access closed in particularly sensitive areas of the coast (never in urban areas), I am very aware that such an act would create a situation in which ordinary citizens would be forced to become outlaws, and would therefore not work.

In addition to my career experience, I also served as an alternate on the negotiated rulemaking committee regarding this issue. After hearing passionate testimony at committee hearings, as well as on numerous other occasions, from dog owners who only wish to responsibly walk their dogs in a small portion of GGNRA lands, I am appalled that a decision was made to further restrict dog walking on lands that currently allow off-leash recreation in less than one percent of total recreation area acreage.

We are all aware that wildlife habitat in urban settings has been decimated by the dense populations of humans that live there. Greatly altered drainages, invasive plants, impermeable surfaces, and air and water pollution are only a few of the destructive consequences resulting from hundreds of thousands of people living within, or close to, natural lands. To claim that off-leash dogs are the problem, when the sheer fact of such large numbers of humans in one place is the basic cause of environmental degradation in urban parklands, is not supported by fact. The DEIS reveals no definitive studies that establish dogs as a major negative impact to urban parklands.

I have seen throughout my long career that people should be encouraged to live in cities, not discouraged. If they cannot enjoy the activities, recreational or otherwise, that make their lives meaningful in cities, they will be pushed into outlying areas where habitats are much more pristine. The hugely negative environmental consequences of such growth in formerly rural areas have been well documented.

Many years ago, the City of San Francisco transferred valuable recreational lands to GGNRA with the understanding that the lands would be managed to meet the recreational needs of the City's residents. At that time, the City

maintained a policy allowing off-leash dog walking in certain portions of these lands. With the exception of the "no-action" alternative, all of the alternatives presented by the DEIS are in violation of the City's original policies and intentions. The result has been a grassroots movement to return GGNRA lands to the City of San Francisco.

More specifically, I present the following points in response to the dog management DEIS: 1. Any further restriction of dogs on GGNRA lands is not supported by science. Reports in the DEIS of negative impacts from off-leash dogs are anecdotal at best, or are based on assumptions, not fact. I see no definitive evidence of scientifically sound research studies supporting the conclusions. 2. The DEIS does not address the impact of alternatives on historic recreational uses. Dog walking (both on and off leash) on a portion of GGNRA lands, albeit a very small portion, has been enjoyed by hundreds of thousands of people for decades., and was intended to continue when the City of San Francisco transferred lands to federal ownership. 3. The DEIS does not address the impact on City of San Francisco owned parks that will inevitably occur when many more people visit those parks to exercise their dogs once restrictions on GGNRA lands are implemented. 4. The information sessions on the DEIS held by GGNRA were inadequate. With an issue this controversial, public hearings where people can testify openly are essential. The information sessions served little purpose other than to present the DEIS as a done deal, and to promote the agenda of the National Park Service. 5. In addition to public comments provided after the release of the DEIS, all public testimony provided on this issue during the ten to twelve years prior to the release of the DEIS should be considered in developing alternatives. 6. Lands within the GGNRA that allow both leashed and off-leash dogs should be expanded, not reduced, to meet the needs of the ever-growing dog-owning community. 7. If GGNRA cannot provide adequate open space for the recreational needs of the people of San Francisco, including dog walking, then the agency's lands should be transferred back to the City.

Thank you.

Cc: Supervisor David Campos Senator Barbara Boxer Senator Dianne Feinstein Congresswoman Nancy Pelosi

Correspondence ID: 4552 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Rena Bransten and I have lived in two different homes along

the Presidio Wall on Pacific Avenue for fifty years. I am 78 years old.

I have always had dogs that I walk at least once a day in the Presidio early in the morning: 6:30 a.m. on weekdays; a little later on weekends. Currently I own two pugs in their middle years. I have always cleaned up after my dogs and also cleaned up after other dogs, as I am very delighted to live near and have access to this beautiful park area. I have always supported environmental issues and instructions as well.

I am writing to suggest that alternatives to the proposed dog management plan be considered. I see a lot of dog-walkers and have rarely seen destructive behavior on the part of dogs while they are being walked. Much more in evidence is unattractive behavior on the part of humans, possibly without dogs, who throw trash everywhere except garbage cans.

I feel the community of dog-walkers and owners is a very constructive group particularly in an urban environment where there aren't as many opportunities to share thoughts. My feeling about the current proposal is that the attitude toward dog owners is adversarial and dismissive. I don't think a lot of time has gone into addressing the problem or possible solutions that might better suit all parties. Respectively,

Rena Bransten

Correspondence ID: 4553 **Project:** 11759 **Document:** 38106
Received: May,10,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

My name is Maida Thomas and am a native San Franciscan and 86 year old senior. I have been enjoying the GGNRA for my entire life, much of the time with my family including the family dogs. I have also been a long time environmentalist and a contributor and member of many environmentalist organizations including the Sierra Club and the World Wildlife Fund. I believe that it is important to protect the environment and also the quality of life for those of us living in this beautiful area.

The human animal bond is very important to me. As a responsible dog guardian, I keep My dog under voice and sight control, clean up after her and keep her out of the Fenced dunes and vegetative areas. It is important for my dog walking friends and me that areas like Fort Funston and Crissy

Fields remain open for off leash dog

walking access. I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site specific conditions.

As presented in the DEIS, the proposed dog management plan eliminates dog-walking (On and off leash) access for all new lands (additions to the GGNRA sometime in the future) within San Mateo county lands. The GGNRA's mission applies equally to new lands as existing lands and it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands.

I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options (besides restricting dog walking access) should be considered first. For example, it is not clear where dogs are allowed. I think the GGNRA should provide better signage and create environmental barriers, such as the vegetative barriers surrounding the tidal marsh at Crissy Field or the restored dunes at Fort Funston.

As a responsible dog guardian and advocate for animals, I know it is crucial that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well-behaved dog. Having places where I can take long walks with my dog allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dog and dog guardians will not have sufficient opportunity to exercise and recreate.

Some areas within the GGNRA also serve as a place of solitude for me and provide me with a very important peace and safe outdoor space and experience within the San Francisco Bay Area, a large metropolitan area.

Some specific problems with the DEIS include the following points. Please revise the DEIS to correct these errors.

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. I wish that the DEIS would include an alternative along these lines.

The proposed "compliance-based" approach should be modified to create a baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts ' other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. The DEIS needs to provide full disclosure to the public and decision makers. If dog related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences

need to be fully and fairly disclosed for everyone ' so that an informed decision can be made.

And lastly, I support Alternative A, the No Action alternative and would also include the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra) in San Mateo county.

The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site specific information that these areas are inappropriate for continued dog walking.

Respectfully, Maida Thomas Carmel Valley, Ca 94549 CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Correspondence ID: 4554 **Project:** 11759 **Document:** 38106

Received: May,16,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

I have been a resident of Daly City for over 27 years. For the past 15 years I have been enjoying the opportunity to walk my dog off-leash in the GGNRA areas, in particular, at Fort Funston. Prior to getting a dog, I had never visited the'GG-NRA areas. Since I became a dog owner, walking my dog in the GGNRA areas that allow off-leash dogs has become a daily activity for me. The opportunity for walking my dog in these areas has become central to maintaining my quality of life and is our main form of recreation, exercise, and socialization. I am writing to you as it is very important to me and many of my friends and family to continue to have access to walk with our dogs in areas like Ft. Funston and Crissy Field within the GGNRA.

I strongly object to the GGNRA's preferred alternative to restrict or eliminate off leash dog walking in many areas of the GGNRA. It is not based on solid scientific evidence or objective monitoring and observation of the dog walking areas. I have a degree in Biology and I have had 15 years of closely monitoring these areas as I spend time there and my observations do not concur with those in the DEIS. I don't agree with the assumption that it is dogs and their owners that must be removed or restricted from the areas

we have access to in order to meet the GGNRA's objectives to: . Preserve and protect natural and cultural resources and natural processes . Provide a variety of visitor experiences Improve visitor and employee safety . Reduce user conflicts . Maintain park resources and values for future generations

I am a responsible dog owner who has taken every effort to make sure that when I am with my dog at Fort Funston, I have voice-control over my dog, I clean up after her, we obey the access restrictions to certain fragile habitat areas, and I am aware of other people who are walking through the area who may not be comfortable with a dog coming up to them. In my experience, it is very rare to encounter anyone who has a problem with dogs using these off-leash spaces. In fact the opposite is true, there have been a number of times when I have met someone without a dog at Fort Funston who is delighted to be in the midst of dogs having fun, running, and playing. There have been people that ask me for an opportunity to pet my dog as they can't have a dog themselves but still love the opportunity to interact with well behaved dogs. It brings a smile to their face, and I have the opportunity to positively impact their experience with dogs in these beautiful spaces.

I would like to see the GGNRA employ options other than restricting access to the GGNRA resources to dogs in order to meet their objectives. Over the years of my nearly daily visits to Ft. Funston, I have seen dog owners take more effort than many other visitors to the area to preserve and protect the areas we visit. Dog owners know we are fortunate to have access to these beautiful spaces near a large city like San Francisco and we work together to make sure that these spaces will be available in the future for others like us who love to spend time with nature, family, and our dogs. There is a strong community of dog owners that use these spaces and these groups would welcome the opportunity to work with the GGNRA to preserve our precious spaces. I'm a member of the Ft. Funston Dog Walkers, SFDOG, and Crissy Field Dog Group. As a member of these groups, I receive news alert emails and reminders to be aware of swallows and other wildlife or native plants when walking. I work together with other members to do monthly clean-ups at Ft. Funston. We value these areas, respect the environment and want to do all we can to preserve this space for future generations. I have seen little in the way of cooperative work between the GGNRA and the dog-owner groups and feel this is a missed opportunity for the GGNRA. These groups are loyal supporters of the areas they visit and want to protect and preserve them. The goals of the dog owner groups are in alignment with the objectives stated in the Dog Management Plan.

There is little evidence presented in the DEIS of the impact on dogs in these areas. Can the impact of dogs be clearly distinguished from the impact of human visitors (adults and children) or the forces of nature? In 15 years of observation, I have noticed more impact on the environment by wind and rain than by the visitors and dogs. Regular dog-walking visitors to Ft.

Funston are aware of the instability of the bluffs after a rainy period. The GGNRA has done little to protect the safety of new, inexperienced visitors to this area ' a few well placed signs would do a great deal to protect visitors and prevent the need to call for rangers to rescue folks that venture too close to the bluffs edge. Signage in general is a mechanism for public education and awareness that GGNRA should investigate as a way to reach their objectives without changing current access to areas. Change of the public starts with education. Signs posted along the walking paths could increase awareness of the public to the wildlife and vegetation that needs protection in the areas. This would allow the public to continue to enjoy these areas and dog owners to become more aware and take steps to control their dogs as needed to protect those sensitive environments. Most of my fellow dog walkers and I heed the few signs that are placed in these areas because we value the environment and feel it is our responsibility as visitors to these wonderful areas to do our part to preserve them. Of course, there will always be a small minority of people who feel the signs and rules don't apply to them. Should the majority of dog owners be denied access to these valuable resources in our SF area because of the behavior of a few irresponsible people? With increased public awareness and education, those who are ignorant of the rules may be encouraged to act in a more responsible manner.

Of the alternatives proposed in the Dog Management Plan/DEIS, I support Alternative A, the no action alternative. I would like the NPS to change to support Alternative A as their preferred alternative. I believe there is a great opportunity to leverage the commitment and sincere desire of the dog owner community to work together to increase public education and awareness to meet the objectives of the GGNRA without removing or limiting the spaces available for dog walking in the GGNRA areas. My primary reason for requesting the change to Alternative A is the need for additional science-based observation, long term monitoring, and public outreach before taking steps that will remove the opportunity of a large part of the public from using and enjoying the recreational areas we love within the GGNRA.

Sincerely,

Laurie Macomber Daly City, CA 94014

Cc: Representative Nancy Pelosi Senator Barbara Boxer Senator Diane Feinstein Congresswoman Jackie Speier Senator Leland Yee Ken Salazar, Secretary of the Interior Jon Jarvis, National Park Service Director

Correspondence ID: 4555 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Letter

Type:

Correspondence: Congressman Pete and Helen McCloskey Rumsey Farms Rumsey, CA 95679

May 26,2011

Mr. Frank Dean General Superintendent Golden Gate National Recreation Area Building 201, Fort Mason San Francisco, CA 94123-0022

Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

My husband and I are native Californians with long ties to the Bay Area. We are both committed conservationists; my husband helped draft the Endangered Species Act during his years in the U.S. Congress, and he co-chaired the first Earth Day.

We must go on record as strongly disagreeing with the GGNRA's current "preferred alternative" in the DEIS. As the responsible owners of five dogs, we are very dismayed with the significant restrictions on, and elimination of, off-leash dog walking in many areas in the GGNRA. It is our opinion that the proposed regulations making changes to the long-standing 1979 Pet Policy are not fact-based. We do not see well-documented, scientific, monitoring-based facts that can accurately allocate blame specifically to dogs in a site-specific manner that differentiates, for instance, the significant impact of large events, bicyclists, boot camps, homeless people, teenagers, impacts of other species, weather events, etc.

For many people, the companionship of dogs is essential to their well-being, and the healing capabilities of dogs, for instance to veterans, is science-based and well-founded. Yet the new proposed regulations seem clearly anti-dog, and do not serve the public well. Additionally, it seems unreasonable to eliminate ALL dog walking on any new land additions to the GGNRA. Such decisions should be based on monitoring data and be site-specific. As they are now proposed, such sweeping exclusions are arbitrary.

We have hiked in the GGNRA and visited Crissy Field many, many times. We have rarely seen dogs stray into restricted areas- actually, children, teens, and homeless people are more likely errant in this regard. We have never seen any dog be aggressive to any human. There is the occasional very minor dog skirmish, which in our experience has never been more than a vocalization or body posture, which are totally normal and no cause for restrictions such as the ones you are proposing in the so-called preferred

alternative.

Since 99% of the GGNRA land is already off-limits to dogs and their humans, the restrictions are truly objectionable. This document presents an "either-or" approach to the conservation of natural habitat and recreational uses. In fact, the vast majority of dog owners are good land stewards who understand the necessity of protecting natural resources. The "preferred alternative" dismisses the responsible majority of dog owners in order to attempt to eliminate a tiny minority of irresponsible ones. A far better approach is to provide clear signage that educates the public on areas of concern. Enlisting the animal welfare, conservationist and dog-owning communities in such an effort could create goodwill and be a constructive way to make the current rules more clear.

Education and cooperation are always more effective in increasing compliance than prohibition and regulatory heavy-handedness.

Frankly, the document as a whole has an almost adversarial feel to the very nature of the many communities the GGNRA was designed to serve, and sets itself apart from those communities. Because the Draft Environmental Study did not include in its scope the GGNRA's impacts on the urban world to which it is in many areas adjacent, it fails to embrace an essential part of what makes it unique: that it is the wild sibling to a dense, urban world. Yet that urban world is filled with lovers of the GGNRA- dog owners amongst them. The GGNRA's DEIS and "preferred alternative" seems to miss a world of opportunity in creating communities of interest with those affected by it. This includes the City itself, whose parks will see much greater pressure if the GGNRA further restricts recreational use in the manner it proposes. Where alliances could be built, the proposed "preferred alternative" creates alienation. There appears to be a significant bias against the No Action option. We support Alternative A, with site-specific, monitoring-based analysis on any new land additions to the GGNRA.

Sincerely, Helen and Pete McCloskey cc: Representative Nancy Pelosi
Senator Dianne Feinstein Ken Salazar, Secretary of Interior Jon Jarvis,
National Park Service Director District 1 Supervisor Eric Mar District 2
Supervisor Mark Farrell District 3 Supervisor David Chiu District 4
Supervisor Carmen Chu District 5 Ross Mirkarimi District 6 Supervisor
Jane Kim District 7 Supervisor Sean Elsbernd District 8 Supervisor Scott
Wiener District 9 Supervisor David Campos District 10 Supervisor Malia
Cohen District 11 Supervisor John Avalos Mayor Ed Lee

Correspondence ID: 4556 **Project:** 11759 **Document:** 38106
Received: May,07,2011 00:00:00
Correspondence Letter

Type:

Correspondence: Dear Superintendent Dean:

My wife and I are San Francisco residents since 1966. Our sons were raised in the City. Throughout, we have always had two dogs, which are/were an integral part of our family.

We are writing to express our opposition to the Draft Dog Management Plan for the Golden Gate National Recreation Area (GGNRA).

We live across the street from Douglass Park, an off-leash dog play area. We are concerned that an unintended consequence of GGNRA's Dog Management Plan will be the over-utilization of San Francisco Parks, particularly the designated off-leash dog play areas. With the implementation of the restrictions, dog owners will go more to the City designated off-leash sites to avoid the expected hassle in the GGNRA. We have already experienced a substantial increase in dog use at our park. Although, in our 45 years of dog ownership, we have not seen a dog attack a person in any of the parks we utilized, we are concerned that over use of a dog off-leash area could lead to overaggressive behavior in dogs that could result in potential danger to people in and around the parks.

We exercise our dogs at Douglass Park in the morning and in a variety of San Francisco off-leash parks and GGNRA sites in late afternoon. We do not use Douglass Park in the afternoon because it has limited space and is so very crowded with dog walkers. If use by off-leash voice-controlled dogs is drastically restricted at Ocean Beach, the dog play area at Stern Grove, an area we utilize, will be very adversely impacted. Such an event happened recently when the tsunami warning closed Ocean Beach for several days. The use of the dog off-leash area at Stern Grove more than quadrupled during that time. San Francisco has a procedure in several parks that GGNRA may want to implement. The sites have a children-only area and a dog off-leash play area. The children's area is fenced, preventing access by dogs. Rather than fencing in dogs to protect the environment, GGNRA should investigate fencing off fragile habitats to protect them from encroachment.

Golden Gate National Recreation Area is uniquely situated in an urban environment, not in a more remote area like a national park is. GGNRA does not fit the usual mold for the operation and restrictions for a national park, and its use must take into consideration activities more geared to people in the San Francisco Bay Area. Nearly one-quarter of San Francisco residents own dogs. We have two ourselves. Areas like Fort Funston and Ocean Beach, within the GGNRA's boundaries provide much needed opportunities for people to exercise their dogs off-leash. We strongly support the continuation of this policy. We, therefore, request the

formalization of the 1979 Pet Policy and, further, expansion of access to off-leash areas in San Mateo County.

There are studies too numerous to mention that show exercise is very important for a healthy body. People have many excuses for not exercising, but one built in need to exercise is to have a dog. Both Fort Funston and Ocean Beach provide the expanse of space for a long walk/jog/run as part of exercising a dog. Restrictions on the size of the off-leash areas will restrict the people's ability to exercise their bodies. This is very important, especially in an urban environment where space is limited.

Compliance-based Management Strategy cannot be part of any plan because it can change the status of areas automatically and permanently without public comment or need by GGNRA to prove that the off-leash policy is not working adequately by its subjective standards. We urgently request that the draft Dog Management Plan not be considered and the GGNRA retain the status quo for dogs off leash at their sites as assumed by the City of San Francisco when it turned over land for GGNRA. Sincerely, Charles J Roberts

cc: Jon Jaris, Director, National Park Service Secretary Ken Salazar, Department of the Interior Representative Nancy Pelosi, House Minority Leader Senator Diane Feinstein Senator Barbara Boxer

Correspondence ID: 4557 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Frank and Howard,

It has been a pleasure working with both of you on important projects spearheaded by the Golden Gate Parks Conservancy and the Golden Gate National Recreation Area. In the last year, we made significant progress specifically on two initiatives'Foodfor the Parks and Park Prescriptions, and we have had fun at the same time.

Please allow me to share my thoughts with you on another topic dear to my heart and currently front and center for the Golden Gate National Recreation Area'the Draft Dog Management Plan. My request is that you choose Alternative A, the No Action alternative. I also request that you include the "New Lands" areas (such as Cattle Hill, Sweeney Ridge, Mori Point, Pedro Point, Milagra Ridge, and Rancho Corral de Tierra) in San Mateo County.

This request stems from the fact that I am an avid environmentalist, a dog owner, and a dog lover. I have worked as a conservation professional for 20

years, and I understand the challenges of balancing human needs with environmental protection. This task is particularly hard in our beautiful, urban setting that has a higher proportion of people and dogs than most National Parks. I understand how complex this issue is because your decision will impact the health of people, the environment, and domestic animals. I am hopeful that it is possible to find a way that we all can coexist today and in the future.

I know it is crucial that our dogs are well behaved and trained. Additionally, adequate exercise and socialization are essential for a well-behaved dog. Having places where I can take long walks with my dog allows me to get the exercise I need while also meeting my dog's needs. In fact, this reminds me of Dr. Daphne Miller's suggestion that one way to improve the health of people is to get veterinarians to write prescriptions for dog owners and their dogs to take walks. Just as Golden Gate wants to facilitate healthy activities for people, we need to make dog walking easy as well. Some people will prioritize the need to keep their dogs healthy while ignoring suggestions from their own doctors. Without access to the small amount of land in the GGN'RA we currently have, I am very concerned that many dogs and dog guardians will not have sufficient opportunity to exercise and recreate.

It is also a priority for me that the final plan includes corridors from parking areas to off-leash areas. The preferred plan requires that dogs be on leash in order to reach the off-leash areas. It is essential to have some locations that allow dogs to release energy at the beginning of the walk (when they need it most). It also seems to me that there are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent.

The GGNRA could develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. For example, in partnership with dog-associated businesses, perhaps it would be possible to create an annual permit system that includes modest education requirements in order for regular off-leash dog use. I could see that something like this could generate revenue for the National Park Service or the Golden Gate Parks Conservancy.

The draft plan has the effect of punishing many people simply because a very small number might need education or are insensitive and irresponsible. It is also possible that we could improve the current signage of off-leash areas. A possible response to this problem is to educate visitors, improve signage, and help park visitors follow the rules and learn how to respect the environment.. Thank you for letting me express my support for Alternative A, the No Action alternative. I also hope that the final plan would also include the "New Lands" areas (such as. Cattle Hill, Sweeney

Ridge, Mori Point, Pedro Point, Milagra Ridge, and Rancho Corral de Tierra) in San Mateo County.

Thank you for your hard work on this issue. I am impressed with the care and consideration you have given to this important and highly emotional issue.

Respectfully, Patty Debenham Ph.D. San Francisco, CA 94115

CC: Representative Nancy Pelosi 8th Congressional District of California, House Minority Leader, United States House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Correspondence ID: 4558 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

My husband and I have lived in San Francisco since we were married in 1966 and we raised our sons in the City. In addition, we have had nearly 100 foster children since 1975. Throughout, we have always had one dog, more often two dogs. Children relate very well to the dogs, joining us in exercising our dogs. At the present time, we have a 7 year old female rescue Collie and a 6 1/2 year old Australian Shepherd, which we exercise twice daily.

We live across the street from Douglass Park, an off-leash dog play area. We are concerned that an unintended consequence of GGNRA's Dog Management Plan will be the over-utilization of San Francisco parks, particularly the designated off-leash dog play areas. We have already experienced a substantial increase in dog use at our park. We exercise our dogs at Douglass Park in the morning and in a variety of San Francisco off-leash parks and GGNRA sites in late afternoon. We do not use Douglass Park in the afternoon because it is so very crowded with dog walkers.

While our house has a fenced backyard, it is not designed for exercising dogs. Heather, our Collie, exercises by chasing a ball. She also socializes with other dogs. If she were restricted to on-leash, Heather would be unable to exercise.

As a senior citizen with a disability, 76 with Parkinson's Disease, I have been instructed by my primary care physician and my neurologist to exercise daily. Exercising with our off-leash voice controlled dogs is ideal. I tend not to approach people I do not know, particularly individual males,

unless they have a dog with them. Personally, I prefer not to approach a person holding a dog on leash because I cannot always judge the dog's temperament. Also, many dogs are more combative when on leash. Rather than fence in dogs to protect the environment, fragile habitats need to be fenced off to protect them from encroachment. Douglass Park, for example, is separated into areas for off-leash dog play and for children's play and tennis/basketball courts. This makes good sense.

Golden Gate National Recreation Area (GGNRA) is an urban recreation area, not a national park. We consider ourselves to be active environmentalists. Among the organizations to which we contribute are: American Rivers, the California Academy of Sciences, California State Parks Foundation, Defenders of Wildlife, Earthjustice, Environmental Defense Fund (EDF), Environmental Law Program, Friends of Upper Douglass, Galapagos Conservancy, National Park Foundation, National Parks Conservation Association, National Wildlife Federation, Natural Wildlife Federation, National Resources Defense Council, Neighborhood Parks Council, Rainforest Alliance, San Francisco Dog Owners Group, San Francisco Parks Trust, San Francisco SPCA, San Francisco Zoological Society, Sierra Club, The Marine Mammal Center, The Nature Conservancy, The Ocean Conservancy, the Sierra Club Foundation, the Wilderness Society, the Yosemite Fund, Wildlife Land Trust and the World Wildlife Fund (WWF). Support for some of these organization goes back 20 years or more. the California Academy of Sciences, Earthjustice, EDF, Sierra Club, the Wilderness Society and WWF are examples.

We respectfully urge you to support formalization of the 1979 Pet Policy and the addition of off-leash access in new lands as well. Compliance-based Management Strategy cannot be part of any plan because it can change the status of areas automatically and permanently.

Sincerely, Gail P.Roberts cc: Jon Jaris, Director, National Park Service Secretary Ken Salazar, Department of the Interior Representative Nancy Pelosi, House Minority Leader

Correspondence ID: 4559 **Project:** 11759 **Document:** 38106
Received: May,06,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

This is to express my opposition to the proposed preferred Alternative D for the Rancho Corral de Tierra lands (here-in-after "Rancho") stated in the Dog Management Plan/ Draft Environmental Impact Statement (DMP/DEIS) for Golden Gate National Recreation Area (GGNRA). While much of Rancho

land is relatively unused open space and should remain in its present state the decision to exclude all dogs from this land is arbitrary and without merit given the past and present use of these lands. I refer to those trails leading from the end of Coral Reef in El Granada and lands generally located north and west of Farrallone View Elementary School, in Montara. Specifically, the lands adjacent to Farallone View School are bounded on the west by the former Farallone View Cutoff and the Old San Pedro Mountain Road, on the north by McNee Ranch State Park and on the east and south by the Caltrans right-of-way for the proposed Devil's Slide Bypass and the subdivided portion of Montara which abuts Rancho property (map enclosed).

I relocated to Montara in 1983 when my wife was transferred by the National Park Service to head the then Maritime Unit of GGNRA. Over the intervening 28 years, almost every day, I and my neighbors, have walked our dogs on the roads and trails that crisscross this land. In Montara this land has been used for agricultural purposes since the Spanish first settled San Francisco. Cattle and later dairy cows grazed this land for almost two centuries. Portions of this area of Rancho subsequently were converted into food and floral cropland. The remains of the Old San Pedro Mountain Road bisect this part of the Rancho property and provide access to McNee Ranch State Park where dogs are allowed. Furthermore, it is my understanding that a significant portion of this land was acquired by Caltrans for its proposed Devil's Slide Bypass and is still owned by that state agency which does not ban dogs. While this part of Rancho remains open space it is clearly not pristine unused land. In addition to local dog walkers this area is used by rescue dog groups to train their dogs for search and rescue missions. The trails throughout this area are shared with equestrians, mountain bikers, birders, hikers and people just out for a stroll, admiring the ocean views and spectacular sunsets. To change the current and past use of this area to "No dog walking allowed unless opened by GGNRA Compendium" as stated in the preferred Alternative D of the DMP/DEIS would be an unacceptable slap in the face of all of us environmentalists who supported the Peninsula Open Space Trust's acquisition of Rancho and urged Congressman Lantos to broker the deal which will result in Rancho becoming part of GGNRA. I request that you continue to allow dog walking in this area, on leash on trails and off leash on the open fields and areas east of the old Farallone View Cut-off. With respect to the rest of Rancho it seems most appropriate to allow a continuation of dog walking on leash which is consistent with current San Mateo County requirements.

It is unfortunate that the residents of the San Mateo Mid-Coast Area were not invited to participate in the public scoping process when the DMP/DEIS was initiated. If we had been, NPS would have known of our interests and use of Rancho lands at the earliest stage of the development of the DMP/DEIS and I am confident your planners would have proposed an

alternative for the use of these lands more appropriate with their past and present use.

Your assistance in preventing the banning of all dogs from Rancho lands will be gratefully appreciated.

Sincerely, Louis S. Wall

Enclosure: Area Map

CC: Congresswoman Jackie Speier Bill Bechtell, Montara Dog Group

Correspondence ID: 4560 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

I am writing to express strong opposition to the GGNRA draft dog management plan, for a number of reasons.

1. Insufficient data to iustify a significant land use change For decades recreation has been balanced with resource protection, and the dog community has had access to a minute fraction of the space, as set out in the 1979 Pet Policy, most of that access in areas where there is also a high concentration of human activity.

The DEIS offers no definitive evidence, rather only speculation, to document dog impacts that would support the proposed significant restriction in space for off-leash recreation. Likewise, there is no plan in place to evaluate the effects (or lack thereof) of the proposed drastic changes on the environment within the affected areas once the plan goes into effect.

The DEIS lists as impacts things that "might" or "could" happen, not documented impacts. The GGNRA monitors from 2000 to 2006 observed very few dogs in the closed area around the Bank Swallow colony. No dogs were observed collapsing a Bank Swallow burrow, flushing a swallow, or causing a landslide in the Bank Swallow colony, yet digging, flushing, and landslides are listed in the DEIS as potential impacts, and this is used to justify a significant land use change that will adversely affect tens of thousands of people and pets.

The DEIS also does not contain any studies comparing the relative impacts of natural predators and humans with that of dogs. Significant land use

changes are therefore proposed based on essentially confounded data.

Further, an EIS is required to examine the human environment. Federal NEPA rules define this as "The human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." [emphasis mine]

<http://cea.hss.doe.govinepairs/ceq/1508.htm#1508.14> The draft EIS contains no substantive analysis of the adverse impacts to recreation or the humans who enjoy it. In fact, the plan dismisses this by stating that "The quality of urban areas is not a significant factor in determining a dog management plan." There is no consideration of the effects on human health (physical and mental) and human communities that would be caused if off-leash hiking is drastically restricted. This decision will affect the everyday lives of tens of thousands of people.

There has been no substantive analysis of the effects of the proposed changes on city parklands. For this reason among others, the San Francisco Board of Supervisors voted 10 to 1 in favor of a resolution opposing the dog management plan. 2. Public process has been inadequate There needs to be an adequate public hearing on this issue, where people can testify openly in a public forum, with tools in place for recording the hearing and producing a transcript. Instead, the NPS provided "information" sessions with no opportunity for public testimony and no recordings made of the meetings.

The January 23, 2001 Citizens Advisory Commission hearing drew 1000+ people, including 9 of 11 members of the San Francisco Board of Supervisors, to speak out against the proposed vote to recommend rescinding of the 1979 Pet Policy. That is a reflection of the strength of public sentiment opposing the removal of off-leash access in GGNRA.

Attempts to evade and dilute that public sentiment ' with a slightly more gradual approach to slashing off-leash access and use of a process without open public testimony/recording of the proceedings ' do not change the fact that public sentiment is strong on this issue and merits consideration. I would like to request an adequate public hearing and also that all public testimony on this issue during the 10 to 12 years prior to the DEIS should be considered.

3. Compliance-based management component allows for significant land use changes with no public process

I strongly object to the compliance-based management provision in the DEIS. This allows for further ' significant ' land use changes without any public process, based not on evidence of damage to the environment caused by the non-compliance, but based only on whether or not there has been

compliance.

Mr. Dean, you acknowledged in the Board of Supervisors Land Use Committee hearing on April 22 that the compliance-based management provision could possibly lead to an eventual ban on off-leash dog walking in the GGNRA. From the transcript:

SUPERVISOR WIENER: And then, the next step is if there would not be 75% or higher compliance, could it then go to a ban on dogs in that particular area?

SUPERINTENDENT DEAN: Potentially, yes, if it was a, if it was a leashed area that, that was problematic, it would, the next level would be no dogs.

SUPERVISOR WIENER: So if this plan is approved, we could in the future have a situation where parts or potentially all of GGNRA would be totally off limits to dogs.

SUPERINTENDENT DEAN: That would be a worst-case scenario.. And this significant land use change would occur without any public process. 4. Visitor Experience The DEIS focuses on visitors who do not want to be around off-leash dogs. First, there are many places where people can go if they do not want to encounter off-leash dogs, far, far more than the number of places that allow off-leash dogs. Second, consideration should also be given to people without dogs who are either neutral or positive toward encountering dogs in the parks.

I encounter non-dog owners on my walks all the time who clearly enjoy interacting with dogs and in fact many times I've had people come up and ask me if they can pet my dog. Many tell me that they love dogs or their kids love dogs, but they cannot have one of their own, and they therefore love come to places like Fort Funston to interact with them. Any assessment of visitor experience must include non dog owners who are neutral or positively inclined toward being around off-leash dogs.

People who have a positive experience in the park are not motivated to call the Park Service and report their positive experience.

5. Safety Issues The DEIS claims a major safety problem with dogs in the GGNRA. Where is the documentation for that claim? The Park Service's own data, obtained through FOIA requests, reveals that only '2% of serious incidents involved dogs; the vast majority involved people.

6. Recreation in the GGNRA

Overall, recreation within GGNRA has been de-valued by the Park Service,

as evidenced by attempts to change the name of the park within Congress such that the very word "Recreation" would have been removed. This is in conflict with the intent of those who drafted the enabling legislation that created this urban park as well as promises made to the city of San Francisco when the land was transferred, to honor traditional recreational activities.

Specific to dog-walking, the DEIS mandates no dogs at all on future lands acquired by the GGNRA. This, to me, indicates an inclination to eliminate dog-walking altogether and to de-value recreation overall. This runs counter to the vision of those who drafted the enabling legislation and those who spoke out at Congressional hearings on the need for recreational open space prior to creation of the GGNRA.

6. General Comments I am a 60-year-old woman and I visit Fort Funston several times a week with my dog off leash under good voice control. She enjoys off-leash play, exercise, and socialization, all factors known to make dogs better citizens, and I greatly enjoy the exercise, socialization with a diverse and wonderful group of people, and the joy of watching dogs run and play off leash. The health benefits of such interaction for both humans (especially those of us who are aging) and for dogs are well documented in the annals of human medicine and canine behavioral science.

The communities that evolve around dog walking are like pure gold, especially in the often otherwise impersonal environment of a city. The atmosphere at Fort Funston is magical with its diverse mix of people with and without dogs of all ages, all enjoying fresh air, community, and connection. If access to GGNRA is severely restricted to an even smaller fraction of space, the concentration of people/dogs in those smaller areas would raise the likelihood of incidents. This is another aspect of the proposed changes that has not been addressed. Communities would be destroyed as people feel forced to go elsewhere with their dogs.

For example, the Preferred Alternative would allow off-leash dogs only on the dunes adjacent the parking lot at FF, and on part of the beach. Many elderly and/or mobility impaired individuals cannot make it down the steep access trails to the beach, and thus would be left only with access to that small dune area, which is difficult to navigate, for off-leash recreation. If a person wants to stay close to their off-leash dog (eg, in order to clean up after them), he/she would have to clamber over that difficult-to-navigate terrain, which will be far more crowded with people and dogs, thus increasing the likelihood of being jostled or knocked down.

Mr. Dean, I have been a lifelong supporter of valid environmental issues. Many in the dog community have been long-term members of environmental groups. Love of pets is often emblematic of a larger love for life in all its many forms. I heartily applaud those who fought to preserve the

land within GGNRA from development in the early 1970s. I also applaud their vision in recognizing, and writing into the enabling legislation, the need for recreational open space in this densely populated urban area, balanced with resource protection.

I think the crucial issue lies in defining the balance between recreation and resource protection. Those who seek to eliminate dogs from the equation, or to relegate them to an unworkably tiny segment of the space (with no scientific justification) represent an extreme view that is, sadly, turning people off to the otherwise valuable environmental movement. Cities must remain livable in order to stem the tide of suburban sprawl, a true threat to more pristine habitat. Slashing a tiny fraction of access to an even tinier fraction in this urban parkland, which adversely affects the lives of tens of thousands of city dwellers, is not a rational balance.

Dogs have been the close companions of humans for over 10,000 years (some historians place the date of domestication far earlier). People have enjoyed off-leash hikes with dogs for millennia. That certainly constitutes a historical and cultural value.

The dog community is asking for nothing unreasonable here, merely access to a fraction of space in urban parkland.

With good trail management, better enforcement of existing rules, and more educational rather than punitive efforts, recreation and resource protection can be optimized.

Summary points: 1. I support formalization of the 1979 Pet Policy plus provisions for off-leash access in the lands acquired by the GGNRA subsequent to 1979 and on into the future. 2. The DEIS does not provide definitive evidence for further restricting off-leash access. Reports of impacts are based on speculation, not fact. Relative impacts of other sources of disturbance (humans, natural predators) need to be studied as well, and comparative analyses made. 3. Potential impacts of any proposed changes on the human community and on city parklands need to be studied in-depth. 4. There needs to be an adequate public hearing where people can testify openly, with the proceedings recorded and transcribed. 5. Misleading information about safety issues needs to be corrected. 6. In addition to comments on the current DEIS, all public testimony on this issue over the last decade should be considered.

Lastly, I would like to see dog walking treated with respect as the popular, community-building, healthy, historically and culturally valued recreational activity that it is, rather than as an intrusion on open space, to be maybe grudgingly allowed in an ever decreasing fraction of space, rather than welcomed. It is an activity that is in fact consistent with the Park Service's

own Healthy Parks Healthy People campaign. And it has been a part of human culture for millennia. Thank you for your consideration of these comments. Sincerely, Vicki Tiernan San Francisco, CA 94117 ccs:
Supervisor Ross Mirkarimi 1 Dr. Carlton B. Goodlett Place, Room 244 San Francisco, CA 94102 Senator Dianne Feinstein 331 Hart Senate Office Building Washington, D.C. 20510 Senator Barbara Boxer 112 Hart Senate Office Building Washington, D.C. 20510 Congresswoman Nancy Pelosi 235 Cannon House Office Building Washington, D.C. 20515 Congresswoman Jackie Speier 211 Cannon House Office Building Washington, D.C. 20515 Senator Leland Yee State Capitol, Room 4074 Sacramento, CA 95814

Correspondence ID: 4561 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to strongly protest the efforts of the GGNRA in restricting dogs from running off a leash on GGNRA lands. First I would like to establish why the GGNRA was created: Congress created the GGNRA in 1972 to: "to provide public access along the waterfront and to expand the maximum extent possible the outdoor recreation opportunities available to the region." The proposed dog ban appears to be in direct opposition to that mandate.

1. Dogs are important companions to many people in our city and dog walkers are custodians of the land. They walk on it, love it and look after it, picking up trash, reporting dead animals, and any other problems. Dog owners are law-abiding citizens who by their presence on the GGNRA lands discourage crime of all kinds. It is in the interest of anyone who cares about open space to work together - with dog owners, including, believe it or not, bird lovers in protecting our waterfronts. The beaches are largely deserted except for people and their dogs with the exception of weekends and then only when the weather is fine... rare in San Francisco!

2. The complaints from the Audubon Society and the Park Service that dogs are somehow a threat to the coastal areas is ridiculous and vastly overblown. Any instances of dogs harming birds are very rare and unusual, this can be addressed by proper dog training. As for disturbing the nesting sights this can be addressed through education and signage.

3. Plants should not take precedence over people in urban areas but live alongside people. We must not forget that we are a city and the same standards of preservation do not apply, as they would in a national park in the middle of nowhere...there must be balance between people and plants.

4. The GGNRA does not appear to be interested in making dog owners responsible for the behavior of their dogs and insisting that off leash dogs are well trained. Would you really rather take the easy path and just legislate against off leash dogs?

I would rather see signs asking dog owners to always be respectful of the other users of the beach and not allow their dogs into the areas where the shore birds nest, an education campaign perhaps. Even a license system for owners to have their dogs off leash where they have to prove that the dog is properly trained (rather like a drivers license) might be a solution.

Another idea is to limit the amount of dogs' one person can take to the GGNRA. I can see the problems when you have 10 dogs per person! These people are running a business; perhaps they should be treated as such. The rest of us are people who love the outdoors and love to walk in nature and we choose to do it with our faithful companions. We are the GGNRA's greatest allies. Surely personal responsibility with freedom is better for our society than yet more restrictions and legislation!

This proposed plan is discriminating against one type of person, namely a dog owner; even the coyote has more rights in the Presidio.

Dogs provide so much love and support to humans in so many ways; they need places to run free. A tired dog is a well-behaved dog!

Thank you for your kind consideration,

Yours truly,

Carol Newton Boone

Correspondence ID: 4562 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean, May 27, 2011

My name is Anne Stanton Malone. My family and I have lived in San Francisco for the past sixteen years and we currently reside at 80 Cragmont Avenue in San Francisco. Having come here from New York City ' we were thrilled to find a city that combined city life with the great outdoors.

That is why I am writing to express my opposition to the proposed GGNRA restrictions on off-leash dog walking I adamantly oppose the Preferred Alternative for the DEIS! It is too restrictive and there is no justification for

these major changes.

I support formalization of 1979 Pet Policy PLUS off-leash access in San Mateo County and on new lands that GGNRA acquires in the future. Let me tell you why.

It is not always easy to raise a family in San Francisco ' the costs are high, the schools less than perfect. The fact that culture and recreation are at our doorstep makes a huge difference, and for us has been a major reason to stay when so many families have left.

As homeowners and dog lovers, we spend many of our weekends at Chrissy Field, at Fort Funston, in Golden Gate Park. My daughter, husband, and I find enormous peace, fun and happiness walking and playing in these parks, playing ball and watching our dogs have a chance to run by our sides off leash. Under voice control - of course - but free to walk and run unencumbered by a leash. It fuels our mental and physical health ' and frankly keeps us living in the City. In sixteen years, I have never experienced dogs behaving badly, scaring children or birds, or fighting with each other.

We live in a dense urban area' not a pristine wilderness. The DEIS is written as if the Bay Area and its residents don't exist just outside its boundaries. You are ignoring the impact on us - the residents ' and on area resources if these severe restrictions go into effect.

With this in mind, I want to remind you that the GGNRA has a recreation mandate ' it is a value that should be celebrated and preserved. Instead, the proposed dog management plan and the DEIS treat recreation as an adverse impact. How can the GGNRA uphold its mandate and support this plan?

Furthermore, a compliance based management strategy cannot be part of any plan. It changes the status of areas automatically and permanently - without having to provide evidence, and without a chance for public comment! It is simply wrong. As a parent, a working mother, and a dog owner and lover I respectfully request that you DO NOT CHANGE THE GGNRA OFF LEASH POLICY.

To do so would hurt families, our parks, and our communities. Sincerely yours,

Anne Stanton Malone San Francisco, CA 94116

Correspondence ID: 4563 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Dear Superintendent Dean,

My name is Yuci Yang. I live in San Francisco and do not own a dog. I do love dogs. I am writing to you to share my disappointment with the GGNRA proposals to severely restrict access to the GGNRA lands to people with dogs. I came to the US from China in 1987 and became a US citizen in 1994. The Bay Area is a great place to live because of the diversity of people and how freely everyone interacts. This is especially true when I visit Crissy Field with my husband and family. We love watching the dogs run and play.

I have reviewed the maps you have presented and am very concerned that your proposed alternative where dogs are restricted to a very small area of Crissy Field is unfair to people who own dogs and takes away my enjoyment of the whole experience knowing that some people are restricted to a certain area while I can walk anywhere. I also sometimes walk the dogs of my friends as I enjoy being with the dogs and especially enjoy the social interaction that I have with others when I have a dog with me. For some reason, people with dogs are friendlier.

Further, my husband is disabled and cannot walk far. Your proposed alternative allows dogs in areas that are far away from the parking and restrooms. If you adopt this alternative we will not be able to go to Crissy Field any longer when we are walking our friend's dogs.

The human animal bond is very important to me. I live in a small apartment that does not allow dogs. Walking with my friends' dogs is the only way for me to enjoy the exercising with a dog and is much better exercise than walking alone. I understand that your study says that dogs are ruining the plants and harming the birds. I can tell you from my experience that this is not true. People with dogs keep their dogs under voice command and away from the fenced off areas. I have however seen children and hikers walking through the fenced off areas and do not understand why they do not read the signs.

The newspaper has reported that you are proposing to change the 1979 Pet Policy that was an agreement between the GGNRA and the City. There is no need to change it as the existing arrangements work very well and people with and without dogs are very happy and enjoy Crissy Field peacefully. I understand that you are proposing cutting off dogs completely from new GGNRA areas in San Mateo County. My daughter and her husband are thinking about living in San Mateo and want a dog. It does not make sense to allow these new parks to be open to some people but not for those with dogs. It is important for the health all family members that each family

member, including the family dog, be able to recreate and exercise together on public lands.

I believe that the current arrangement (Existing Alternative) is a good one and should not be changed in any way. I also think you should allow for equal access to park lands for people with dogs and without dogs and that dogs under voice control should be able to run free. San Francisco is a wonderful place because of the freedoms and diversity we enjoy and the ability to exercise in our beautiful parks. Please don't discriminate against people with dogs.

Thank you for considering my comments. Yuci Yang

San Francisco, CA 94102

CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior

Jon Jarvis, National Park Service Director

Crissy Field Dog Group

Correspondence ID: 4564 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan.

Recently I heard the catch phrase "don't people have the right to have an experience that doesn't include dogs at the GGNRA"

And I was thinking that I could say that all day long about a lot of things.

Don't I have a right to go to the planetarium at the museum and not hear a baby cry, or a toddler talking loud. I paid my \$20 dollars, and it is not even recommended that children of this age be in the planetarium. But you know I understand that families are driving miles to come to this museum, and they don't have a place to park their babies and toddlers while the older children and the adults go to the planetarium. So, I am ok with it.

Now I could list for you many, many things that I feel that I have a right to have an experience without being bothered by someone else, but I acquiesce

on these things. I acquiesce because I live in an urban area with lots of people. A civilization, a society, and when you do this you must make sacrifices for the benefit of others.

Dogs are a part of american culture.

When I visit the GGNRA with my dogs, probably eighty percent of the times I visit some child or adult comes up to me and asks me about my dogs and asks me if they can pet my dogs. There is joy on their faces when they interact with my dogs.

Also, I notice many people watching my dog run if she runs. She is part greyhound and it is a beautiful sight when she runs. And I see people talk about it, and point it out when they see it. THEY LIKE SEEING IT!

Last weekend, I was at Rodeo beach. I didn't have my dogs with me, but I enjoyed so much seeing other dogs running on the beach. It just seems like a natural part of going to a beach. So, I would tell you, and these people who say they have a right to have an experience that doesn't include dogs in the GGNRA, to just move to a place where the dogs are not around. It would be the same thing I do when I encounter a loud and obnoxious child or adult. I just move on down the way, and I don't let it bother my day.

Sincerely

Deborah Riat San Francisco, Ca 94121

Correspondence ID: 4565 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am a relatively new dog owner. I adopted my first dog just over a year ago on May 11, 2010. My second dog was adopted in September 2010. I did not realize until I became a pet owner, what a wonderfully dog-friendly city I've lived in for the past 22 years, and how unfriendly most of the Bay Area cities are to dogs. To have an expansive, beautiful place with gorgeous views like Crissy Field available to my dogs and me - heaven! - I am incredibly dismayed that it may be taken away for dog owners.

Fenced in dog-parks are a depressing option for dog owners and dogs alike. Besides being aesthetically displeasing, fenced-in dog parks simply do not provide enough room for dogs to flat-out run and explore, activities, which are crucial to the physical and mental well-being of dogs. just as humans

find a rich, varied environment more stimulating and engaging, the same is true of dogs.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

- Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.
- Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.
- Exclude speculative, exaggerated, biased, or misleading statements and studies.
- Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).
- Enable professional dog walking and align any professional dog walking rules with county or city regulations.
- Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

Sincerely,

Sun Lee San Francisco, CA 94122

Correspondence 4566 **Project:** 11759 **Document:** 38106
ID:
Received: May,31,2011 00:00:00

Correspondence Letter

Type:

Correspondence: In June of 2008 I was bitten on the leg by an off leash dog at Mountain Lake Park. It was on the trail on the backside of the lake and there were over 12 dogs in the trail at this particular time (not uncommon there). Once the first dog closed in it got very scary. Legal experts encouraged me to file a lawsuit, which in retrospect I should have done. Despite the fact that I reported it to Park Police, they did not respond to the incident. Authorities appeared exacerbated and overwhelmed with the extent of the dog complaints and aside from taking a report, had essentially no recourse. Officer Floyd of the US Park Police admitted there was no support from above, and therefore could not enforce dog rules in the National Park. The only advice I got from the Park Police was that I should go walk somewhere else where there were fewer dogs.

Since that time I have been cornered, barked at, growled at and chased by off leash dogs in the Presidio at least ten times. Walking quietly apparently scares some dogs, according to their owners. Other times dog walkers tell me their dogs are just playing. I have been forced to defend myself from oncoming off leash dogs on several occasions, after which I nearly averted potentially serious altercations with professional dog walkers and/or dog owners. Most of the time dog walkers insisted it was my fault because I was scared. Rarely did they apologize or discipline their animals. As a lifelong resident of San Francisco and user of the Presidio I want to express my support for Alternative D in the DEIS. Additionally I want to support an option for no dogs at Baker beach. All the other beaches allow dogs and that does not allow park visitors a beach walking experience free of dogs.

Elsewhere in the GGNRA I am most concerned about dogs on remote trails in the Marin headlands. On many occasions I have spotted dogs in the distance through binoculars running through remote grasslands and scrub chasing rabbits and deer. Of more concern however are dog impacts on the rarer and more vulnerable bobcats, grey foxes, badgers and long-tailed weasels. While dogs are supposed to be on leash or under voice control, many dog owners use the remote trail locations as a chance to ignore the law and let their dogs run wild. Even if Park Rangers were to enforce dog laws, there is essentially no enforcement presence of any kind over these miles of remote trails.

As a bird expert and naturalist I can attest that these disruptions by chasing absolutely have a negative impact on these last remaining, often isolated populations of native wildlife. I have seen dogs chase down and capture young animals on several occasions, usually wounding and killing them. Dog impacts are most acute during the spring and summer breeding season when the trails get the most use.

Main points:

Biology and Ecology Facts on dogs and wildlife:

- Domestic dogs have been bred for strong hunting instincts and are hardwired to hunt Domestic dogs are far more aware of, better at seeking out and better at catching wildlife than their human counterparts

Voice control is least effective in the cases where it matters most, in the cases when a dog is: scared by a child, person or fighting with another dog or animal chasing or hunting wildlife too noisy/far away to hear it

Political and Human points:

-Voice control itself is a major disruption to park visitors. Owners are often in constant contact with running dogs, yelling names and commands that disrupt the natural sounds and peace of the landscape.

- Areas that are favorite dog walking areas become primarily just that, dog walking areas. This discourages other more quiet and passive forms of recreation, compromising the area's ecology and the visitor's ability to enjoy the natural resources of the park.

-As it stands dogs are given a pass to do what humans are not allowed to do in the park. Humans are not allowed to hunt or harass wildlife in the GGNRA.

Dogs can be seen chasing and harassing native wild fauna in the National Park any day of the week, however citations are rarely issued and there is essentially no enforcement.

Correspondence ID: 4567 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

My name is Pavla Sim. I am a resident of Mill Valley, Marin County, California. I have lived in this area for 17 years. After spending 20+ years in the high technology industry I built a successful dog walking and pet care business in Mill Valley. I am certified as a dog walker. I diligently clean up after dogs and keep them out of areas where they are not supposed to be. I work hard to make sure that dogs under my control do not harass people, other dogs and wildlife. My husband, Leonard Hand, and I deeply care about the environment. In 2009-010, my husband was the Treasurer of the

Environmental Forum of Marin, an educational and training not-for-profit organization.

I have reviewed portions of the Draft Dog Management Plan relevant to Marin County. I oppose some of its conclusions, the solutions documented in the Preferred Alternatives and the Compliance Management Plan. The Draft Dog Management Plan is not based on factual observations; rather it relies on spotty research, conjectures, invalid assumptions and misleading conclusions. The plan does not address the impact of the Alternatives on the health and wellness of people, dogs and the community. Everything - the soil, the grasses, the butterflies and the moles seem to be more important than dogs and their owners in this Draft Plan. Furthermore, there appears to be a pervasive lack of knowledge and understanding of dogs. Rather than providing justification for greater restrictions in access to people with dogs, the writers of this document seem to be justifying why dogs should be allowed in the GGNRA at all. The GGNRA is not a typical National State Park which needs to be made consistent with all the other state parks in the country. The GGNRA was designed to be an urban recreation area. Since the percentage of land where dogs are currently allowed is tiny relative to the total GGNRA, there is plenty of other pristine land untouched by dogs where soil, plants and wildlife can thrive. I believe that with good management and education, recreation and conservation can continue to coexist in the GGNRA.

The following comments are with regards to the Alta Trail, Orchard Fire Road and Pacheco Fire Road: It is true that this area is visited by many commercial dog walkers, some of whom walk many dogs off leash at the same time. I believe that it is reasonable to cap the number of off-leash dogs per person but turning this area into on-leash only with a maximum of 3 dogs (or 6 dogs with a permit) per dog walker is too drastic and erpunative. What is the goal? Getting rid of commercial dog walkers on the fire roads between Marin City and Oakwood Valley?

There are approximately 65,000 dogs in Marin County and 200-250 commercial dog walkers. If there was no need for dog walkers, there would be fewer commercial dog walkers in the county.

Commercial dog walkers who walk dogs on the Alta Orchard and Pacheco Fire Roads will not change their business model from walking 5-12 off-leash dogs at a time to walking 6-dogs on leash with a permit. No one walks, six medium to large size dogs, on leash at the same time for a whole hour. All those leashes tangle and can become hazardous to the dogs and to the walker especially if the dogs start to play or all pull at the same time. Unless the Preferred Alternative is something the commercial dog walkers can comply and live with (and stay in business), they will continue to walk dogs as per their existing business model in Marin City. If they are fined by

GGNRA rangers, they will start walking dogs in areas where there are fewer or no rangers, such as the pristine GGNRA areas which are currently free of dogs or in other places in Marin where there is minimal enforcement. They will do whatever they need to do. This is their livelihood!

With regards to the Adjacent Parks section, the Remington Dog Park has a limit of 3 dogs per dog walker, so this is not a viable alternative to the GGNRA land and should not be even be mentioned. No dog park should be listed as an alternative adjacent park, since you cannot take dogs hiking in a dog park. Many of the 26 parks within a 5-mile radius listed are small neighborhood parks with leash laws and playgrounds full of toddlers. It is misleading to list them as alternatives to GGNRA. The only viable alternative is Marin County Open Space. These areas cannot accommodate all the dog walkers currently walking on GGNRA land without becoming overcrowded. In summary, changing the fire roads from Marin City to Oakwood Valley to leash-only access will have a huge detrimental impact on other hiking areas in the county especially in Southern Marin.

I recommend limiting the number of off-leash dogs on the Alta Trail, Orchard Fire Road and Pacheco Fire Road to 6-8 per dog walker. To increase public awareness and cooperation I suggest clear signage at the entrances to GGNRA land and in sensitive habitat areas. Signs at the start of a trail head/fire road need to inform the public that dogs must stay on fire roads. I suggest utilizing low fencing in areas that are particularly at risk of damage, as is currently the practice. I also believe that the delivery of educational training programs designed for dog walkers, private and commercial, in partnership with the Marin Humane Society and the San Francisco SPCA, would help GGNRA to get more cooperation from the dog walking public, without requiring drastic restrictions of access as proposed.

GGNRA should continue to enable professional dog walking due to the need for these services in Marin. In these times of high unemployment, commercial dog walking translates into jobs. The annual permit fee needs to be reasonable and should be published for review with the revised Draft Dog Management Plan.

Compliance-based management needs to be eliminated from the proposal. The public is entitled to the opportunity to review and input to any additional restrictions proposed by the GGNRA in the future.

Sincerely, Pavla Sim Paws in Motion Marin LLC Marin Pet Care Association

CC: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, U.S. House of Representatives Representative Lynn Woolsey, 6th Congressional District of California Senator Diane Feinstein

Senator Barbara Boxer Ken Salazar, Secretary of Interior Jon Jarvis,
National Park Service Director Christine Lehnertz, National Park Service
Director, Pacific West Region State Senator Mark Leno State Assembly
Member Jarred Huffman

Correspondence ID: 4568 **Project:** 11759 **Document:** 38106

Received:

May,03,2011 00:00:00

Correspondence Type:

Letter

Correspondence:

Dear Superintendent Dean:

I am a senior citizen and have lived in the Sunset District of San Francisco for 45 years. For the past 40 years, I have been jogging at Ocean Beach and Fort Funston several times each week, sometimes with a dog and sometimes without. In the 1970's I took my children to these beaches.

I am opposed to the "preferred alternative" in the above-referenced plan because I do not believe there are problems severe enough to warrant excluding a whole group of people from these areas which are so vital to our recreational needs in San Francisco.

You call Alternative A, the "no action" alternative, but this does not have to be the case. In all the other alternatives, you predict less impact from dogs assuming compliance with the regulations, but Alternative A assumes non-compliance. This makes the comparison between alternatives illogical and invalid. I would suggest implementing Alternative A with better enforcement of existing regulations, more education, and better signs. As for those people who would prefer not to see dogs, they already have the vast majority of the GGNRA.

At Ocean Beach and possibly Crissy Field, the Snowy Plover areas could be fenced. This would keep people as well as dogs from disturbing the birds. At Fort Funston signs could be placed near the cliffs to warn people away as those who are not familiar with the area are not aware of the steep cliffs. I would also suggest moving the trail to the beach sand ladder farther away from the hang glider takeoff point.

Ocean Beach and Fort Funston are cold, windy, and foggy most of the year. There really are not that many people, except for dog walkers, occasional joggers, fisherman, and surfers who frequent these beaches. Except for a few sunny weekend days, the general public does not go to these beaches. And, as you state in the DEIS, neither of these areas is pristine wilderness so why not allow off-leash recreation there? This may be a better alternative than restricting these areas, which will encourage people and their dogs to go to more sensitive areas. I am also concerned about your plans for

compliance. In Chapter 2, page 230, you say that "the enforcement of violations is not uniform. This is partly due to the size of the park and the inability of law enforcement staff to be in many different areas at once". If this is true now, you will not be able to enforce the new rules, which will be more strict and presumably require more staff to adequately enforce. The solution to this problem is not more rules but consistent enforcement of existing ones.

Your compliance management plan, in which regulations in an area can become more strict with no public comment if compliance of 75% is not reached, is seriously flawed. The DEIS does not state how compliance will be measured, and it only goes one way from less to more strict. It also assumes that compliance will result in less environmental degradation, an assumption that has not been proven. If less environmental degradation is the goal, then the results of regulations need to be evaluated in that light of the change in condition of the area. There may be some areas that will need to be closed off to people and dogs. Others may do well and regulations can be loosened. If you decide to do compliance by numbers, then a certain percentage of compliance should be a trigger for looser regulations as well as stricter.

And lastly, additions to the GGN'RA should be evaluated individually for the suitability of all types of recreation. To do otherwise does not serve the public well.

Very truly yours,

Joanne Scott

cc Ken Salazar, Secretary of the Interior Jon Jarvis, National Park Service
Director Senator Dianne Feinstein Representative Jackie Speier

Correspondence ID: 4569 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Superintendant Dean,

My name is Michael Garibaldi, I live in Pacifica, and I have been walking my dog at Fort Funston 2 or 3 times a week for the last four years. I am writing to support Alternative A of the GGNRA Dog Plan to keep the current off leash situation.

The Golden Gate National Recreation Area was established to preserve urban recreation uses. There is no type of urban recreation more endangered

than walking your dog off leash. When I moved to Pacifica in 1989, I could walk my dog at the local County Park. Now, dogs are not allowed. I could walk my dog off leash at Sweeney Ridge; now, dogs must be leashed and that is threatened. Without Fort Funston, there will be no place left within a reasonable driving distance that I can go to simply walk a trail with my dog! The Preferred Plan for dogs at Fort Funston is nothing more than a dog park. If that limited area north of the parking lot is used by the same number of people and dogs that currently use the entire Fort Funston area then all the vegetation will be destroyed leaving sand blowing worse than it does now. Also, that many dogs and people in a limited area will cause more conflict.

One of the biggest complaints about dogs is their effect on the Snowy Plover, but at Fort Funston, the Snowy Plover roosts in the cliffs only at certain times of the year. Dogs can't reach those areas to threaten the birds. Dogs are blamed for digging at the base of the cliffs causing the cliffs to collapse. Historically, the cliffs have been extremely unstable and have often collapsed due to the ocean and the weather, not because of dogs. Regarding other birds, after decades of dog walking the 2006 Beach Watch Report (pg 286) rated Fort Funston as having a high shorebird abundance and diversity.

The section entitled "Environmental Justice" claims that based on the Northern Arizona University phone survey this dog issue is only a concern of the white, middle to upper class. The conclusion that non-white are against dogs completely misstates the actual data. The data shows that all the races included in the survey had similar responses toward dogs. If you go to Fort Funston you would see a diverse group of people that mirrors San Francisco walking their dogs. All races, nationalities and languages are represented at Fort Funston. Also, instead of explaining that dogs are allowed in less than 1% of the GGNRA, the survey questions imply that dogs are allowed throughout the GGNRA. And I would guess that most of the people surveyed had no idea what occurs at the GGNRA regarding dogs and their only information comes from newspaper articles like the S.F. Examiner with its sensational and ridiculous headlines calling Fort Funston a "War Zone". The Dog Plan did not give numbers concerning who actually uses and enjoys Fort Funston. I would guess that 90% to 95% of the people that use the park are dog walkers. We enjoy Fort Funston even though it's usually cold, windy and not very inviting. It's not Yosemite or Yellowstone National Parks and shouldn't be held to the same preservation standards. Yet, I have seen many San Francisco guide books mention Fort Funston not because of its natural beauty, but because of its uniqueness as an urban dog friendly area.

The report claims that dog problems at the GGNRA are costly and take up staff time. After 4 years, the only time I have seen park employees at Fort Funston is the ranger in his truck emptying the garbage cans. I am sure that

the cost involving dog issues is miniscule compared to the Park Police presence ever Friday and Saturday night at Ocean Beach.

Please take into account the long history of dog walking at Fort Funston and the unique opportunity we have in San Francisco to safely walk our Clogs in an urban environment. I fully support Alternative A of the GGNRA Dog Plan.

Sincerely, Michael Pacifica, CA 94044

Correspondence ID: 4570 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

As a dog owner and one who frequently walk my dog off leash, I am concerned about the proposed GGNRA Dog Management Plan as it could potentially restrict my ability to walk my dog off leash. For many years I have enjoyed walking my dog in many of the Bay Area National Parks. On these walks I encounter responsible dog owners that keep their dogs under their control and are sensitive to their environment. What I especially like is watch my dog Tucker run freely and be able to interact with other dogs and be happy. It is very important for dogs to socialize and I can't think of a better way for them to get this socialization then by running freely and playing with other dogs. Currently off leash activity is restricted to less than 1% of the parks land. This proposal will drastically reduce the land available for off leash recreation. The plan is difficult enough in San Francisco and Marin Counties, where areas like Fort Funston and Muir Beach will be restricted or off limits to off leash dogs. Worse, the plan leaves San Mateo with no GGNRA land that permits off leash use. As I see the plan the rules are very heavy handed and does not engaged the community to find solutions. The proposal indicates that if noncompliance is observed that the areas management would be changed to the next more restrictive level of dog management. In this case the regulated off leash areas would be changed to on leash dog walking areas and on leash dog walking areas would be changed to dog walking areas. This change would be permanent. This approach unnecessarily punishes responsible dog owners for poor behavior by a small minority. Further the idea that no area could ever be changed to less restrictive rules such as when compliance is good and environment protection needs are reduced, is one sided and unfair.

I recognize there are people whom we'd like to be more responsible with their dogs. But they are few in number, incidents involving dogs in GGNRA are less than 4% of all incidents in the park. Penalizing all dog owners for

the behavior of a truly small minority is not the right approach.

I understand this proposal was written to protect the environment and provide a safe environment for all people to enjoy the park. However I believe a better solution is we work hard to educate and encourage responsible dog ownership. Some examples of this would be community's volunteers to stock dog poop bags and regularly host trail clean up days. Also work with the SPCA to provide low cost and free dog training classes. I believe this collaborative approach is best and viable alternative to simply closing areas to dogs or placing new restrictions. The proposal also ignores the needs of dog owners with limited transportation options or with special needs. People should have the ability to walk dogs off leash in areas close to their homes. This proposed plan would limit access to an entire class of people who have few other options and depend on the current off leash areas to keep their dogs exercised and healthy.

The Bay Area to this day is a dog friendly environment and is not known for certain restrictions against dogs. There are those people out there that do not like dogs and think this is a good solution and should be done. But I say no, don't put restriction on dogs because all they want to do is get outside and play. Making an owner put a leash on their dog is pretty much saying, don't share those moments a dog and owner should as they play together and bond. We have all grown relationships to our pets and when they're not happy we aren't happy and I know the smile I put on my dog is when I put on my shoes and go open that door and he just knows where we are going and he can't wait. My dog loves the parks and playing games where he gets to run free and chases things and has have fun in his own little world. Dogs sometimes do get themselves in trouble but never too much trouble. They like to dig and play in the mud and I say don't put nice flowers where you know a dog will be. Dogs can't be forced to stay on a leash everywhere they go, it is unnecessary and cruel. Some dogs, like little dogs can stay inside all day and get one or two walks a day and be fine but for a big dog they need more exercise than that and be able to stretch their legs and run. There is no reason for the GGNRA Dog Management Plan to continue any longer and should be dropped to secure dog's health and freedom to life.

Sincerely,

Zack Perry

Senior, Half Moon Bay High School Half Moon Bay, CA. 94019

Correspondence ID: 4571 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Letter

Type:

Correspondence: Dear Mr. Dean:

I am a 64-year-old San Francisco native, and have lived in my home in Forest Hill Extension since 1984. I am an independent writer and historian, my wife is a retired social worker, and we have both been active in the Sierra Club, for which we have led hikes since the late 1970s.

For the past thirty years my wife and I have regularly taken our dogs to Fort Funston (and occasionally to Crissy Field) for off-leash dog walking, an activity which has given both our dogs and ourselves much needed exercise and has enabled us to socially interact with a wide variety of fellow off-leash dog walkers, including men and women of various backgrounds, ethnicities, and ages. We have especially noticed that many young children take pleasure in seeing well-socialized dogs run free. As we are concerned with the environment and the rights of other users, we have kept our dogs under voice control and have always picked up their feces. Over the years, we have seen very few bad incidents, and those (mostly dog-on-dog) which have occurred should, in my opinion, be best addressed by education and by penalizing individual irresponsible dog guardians.

Based on my experience, I strongly disagree with the GGNRA's current preferred alternative, which would seriously restrict and eliminate off-leash dog walking in much of Fort Funston and other portions of the GGNRA, and lead to overcrowding in city parks. Although I greatly value the environment and the necessity of preserving the wilderness, I believe that recreational needs should also be given weight, especially in the GGNRA. Fort Funston and Crissy Field are not remote, pristine areas like Yosemite or Yellowstone; they are surrounded by a heavily populated urban area, and the importance of recreation is indicated by the very name of the Golden Gate National Recreation Area. I also oppose the "Compliance-based" management strategy, which would potentially end off-leash access while giving the people no chance to comment on the change. This policy would also punish a multitude of responsible dog guardians and their dogs for the misdeeds of a few. It would be like closing a children's' playground because of the anti-social behavior of a few playground bullies.

I support instead a modified Alternative A (the "No Action Alternative" formalizing the 1979 Pet Policy) and would include the "New Lands" areas in San Mateo County. The present plan should be modified to provide clearer rules and education and outreach as part of the program.

Thank you for your consideration.

Sincerely Randall E. Ham

Correspondence ID: 4572 **Project:** 11759 **Document:** 38106

Received: Jun,02,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My name is Jane Shepard. I am a senior and have lived in San Francisco for 39 yrs. When our children were young they wanted a dog. It is difficult enough trying to raise children in a dense urban area, so I took them to Fort Funston where they could play with other people's dogs. We got our first dog in 1995 and have been walking a dog at Fort Funston nearly daily ever since. Frequently I take our friends' children to Fort Funston, with our dog, so that all of us will get enough exercise.

I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA. We have taught our children that with every trip nature (any place other than our home) we need to leave the area in better condition than when we arrived, so we always pick up litter we find.

I oppose all alternatives in the DEIS and am offended that you call it an "environmental impact statement" when it has been publicly stated numerous times that no science was used and it does not study the impact of implementing any of the alternatives. You need to start over and do it right. For example, it says to use the dog play area at Lake Merced instead. That area has been turned into a native plant garden and is no longer available for dogs and their guardians.

The original '79 Pet Policy was carefully negotiated by all of the stakeholders of the GGNRA including environmental groups (e.g., Sierra Club, Audubon) and a representative cross section of recreational users of the park lands including dog walkers and sought to seek a balance between the various users/activities which historically occurred in the GGNRA properties.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. The DEIS says that increased visitors to Fort Funston necessitates new restrictions, yet on NPS website, your own charts show that is not true. In fact, during the years of the heaviest visitors in the '90s,

the bank swallow population was also the highest.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

Sincerely,

Jane Shepard

San Francisco, CA 94127-1225

cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives
Ken Salazar, Secretary of Interior
Jon Jarvis, National Park Service Director

Correspondence ID: 4573 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My name is Mary Barnsdale. I live in El Cerrito, in Contra Costa County. For many years I have supported numerous environmental organizations, including NRDC, the Marine Mammal Center, the World Wildlife Fund, Save the Bay, Baykeepers, and the Sierra Club. I occasionally take my dog to Ocean Beach, Fort Funston, and Crissy Field.

As a long-time environmentalist and dog owner, I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife

within the GGNRA.

All users clearly have some impact on the GGNRA. Even the presence of people watching birds from a distance inevitably has some effects. But in the Draft Environmental Impact Statement the National Park Service inappropriately singles out dogs. Its conclusions are not based upon sound science nor long-term monitoring of site-specific conditions.

Please note that any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

Please remember that the GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral deTierra in San Mateo county).

Respectfully, Mary Barnsdale

cc: Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director George Miller, Congressman Crissy Field Dog Group

Correspondence ID: 4574 **Project:** 11759 **Document:** 38106

Received: May,20,2011 00:00:00

Correspondence Type: Letter

Correspondence: Who do people rely on to help the blind? Who helps the deaf? Who helps people with a disability? Who rescues lost people? Who sniffs out bombs? Who do they send to hospitals to cheer up and help the sick? Who is man's best friend? Dogs. And this is their reward? Keeping them cooped up on leash? I believe that dogs SHOULD be allowed off leash in more places at the Golden Gate National Recreation Area. Golden Gate National Recreation is not a protected wilderness and people have plenty of other dog-free outdoor areas to enjoy. It is a fun and healthy experience to walk your dog, and limiting access to outdoor areas for dogs and their owners is not fair!

The Golden Gate National Recreation Area (GGNRA) was established by Congress so people could use it for fun and exercise. It is not a protected

wilderness. If some off leash space is taken away to protect wildlife, then other equally good off leash outdoor spaces should be substituted. People harm wildlife more than dogs. Dogs poop, but they don't eat Cheetos or drink juice boxes and leave them lying on the ground. If the goal is to protect wildlife, then focus on preventing the things that actually harm wildlife. Rangers should fine people who litter or who don't clean up after their dogs. All dog owners and dogs shouldn't be punished for things some people do.

People who are not comfortable with dogs have plenty of other spaces to go where dogs are not allowed. There are 80,500 acres in GGNRA and dogs are allowed off leash in 1% of those acres. Ninety percent of this 1 % will be taken away if the plan is carried out. Dogs don't have a lot of spaces already and now would have even less. If people are not exposed to dogs off leash they will grow to be afraid of them and this shouldn't happen. Encountering dogs on the trail is a great way for people to gain comfort with them.

To walk or run your dog is a healthy experience for a lot of people. Many studies show that being with dogs help people be happier. I don't need a study to know that! There is a reason that people send dogs to hospitals, they cheer up the sick and help them. There is a reason people use dogs to help the blind and deaf, they make their lives easier. There is a reason the military has 2,700 dogs in combat, they save soldiers' lives. With all the things dogs do to make our lives happier, easier and safer, shouldn't we at least try to make their lives happier?

I strongly believe that dogs SHOULD be allowed off leash. I know my dog, Shasta, needs to be off leash. I know I love going on a hike or to the beach with her because I love to just be able to play with her. Who is man's best friend? DOGS!

Correspondence ID: 4575 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

Re: Draft Environmental Impact Statement for Dog Management (DEIS) ' with an emphasis on Fort Funston

I am writing to oppose the GGNRA dog management plan and all action alternatives that further reduce or ban dogs in open spaces. The "Preferred Alternative" is just too restrictive. There is no justification in the DEIS for these changes and the "compliance- based management strategy" will punish everyone for the irresponsible actions of a few. In fact, crowding dogs and

their owners in such small areas will cause conflict, triggering your poison-pill scenario. If the DMV took this approach, no one would be allowed to drive!

Since the researchers didn't interview the people actually using the areas affected, let me tell you about myself I am a 66 year-old woman, still working full-time. I am one of the authors of the Bernal History Project's San Francisco's Bernal Heights, published by Arcadia Press a couple of years ago and I volunteer for the Market Street Railway Archive. I also am a student of canine behavior. For almost 20 years, under the auspices of the SPCA's Animal-Assisted-Therapy (AAT) Program, I have shared my dogs with people in San Francisco's mental wards, hospitals and nursing homes.

Even though I live across town, I have visited Fort Funston with my dogs almost every single day that I didn't have to go to work since 1989. Frankly, because I now suffer from arthritis and need new knees, if it wasn't for my two dogs, I'd rarely go outside. Without such a large, unleashed area like Fort Funston, my very active dogs wouldn't have gotten the exercise or socialization necessary for them to grow into well-behaved, obedient AAT dogs, who have earned the "Canine Good Citizen" awards. And, yes, they truly are under voice control at Fort Funston. My husband and I don't walk anywhere that we can't take our dogs. That cuts out almost of the open space in California! It seems ironic that when the National Park Service is pushing a "Healthy People, Healthy Parks" initiative, the GGNRA is doing its best to curtail our one form of exercise ' walking our dogs off leash. Culture and Sense of Community The Preferred Alternative would mean the end of a wonderful community at Fort Funston. It is the most ethnically, socially and economically diverse group of people I have ever seen anywhere, let alone known. When you go often enough, the regulars become your friends. They notice when you're missing and check up on you. They care that you're all right. I have made many very good friends there.

Most people at Fort Funston seem to be able to leave their life behind for an hour or so and be in the moment, just like their dogs. The dogs' joy at play is contagious. One young friend with an autistic son confided that her life is hell, and that her walk at the fort is the only happy time of her day. As an AAT volunteer, I well know dogs can promote healing. While I recovered from a cancer operation, I spent many days sitting below Joey Hill, reading and watching my dogs playing close by. Very sadly the GGNRA has since prohibited people near that dune.

I take every one of my out-of-town visitors to Fort Funston and, without exception, they are amazed at how well the dogs get along, and they always want to return on their next visit. Most dog owners there are responsible, and we work at promoting good canine and human behavior. Our Fort Funston Dog Walkers Group sponsors a monthly park pick-up morning. A

lot of people without dogs bring their children just to get their "doggie fix." So I don't understand your comment that the situation there is "unmanageable." You haven't visited the Fort Funston that I know. Things have been working just fine out there under the 1979 dog policy.

Interestingly enough, San Francisco didn't even make the post office's list of the 30 cities with the most dog bites recently. It's not because it's California, since there were seven cities in our state listed. It's because our dogs are better socialized because of off-leash activities.

Bad Science There are a couple of men who fly their beautiful macaws at Fort Funston some weekends. I once asked if they weren't afraid of the dogs catching the birds. The owner laughed and said, no, the birds will just lift up.

Your own data showed that of 5,700 dogs observed, only 29 deliberately chased birds. That only 1/2 of one percent! That percentage would be a lot higher for the hawks and ravens, which actually kill prey. All the speculation about dog impacts in the DEIR--rather than substantive evidence and measurement--reminds me of the recent NPS embarrassment over the Drakes Bay Oyster Company. Even the Interior Department determined the "scientific study" was biased, improper and mistake-ridden. Considering the contentious history of dog walking in the GGNRA, it seems--like with most consultants--the DEIR ones came up with the conclusions you desired.

Impact on San Francisco Nowhere is mentioned any impact on our already under-funded city parks. It doesn't take a professional to realize that many dog owners will quickly abandon the at best small and crowded areas allocated under the plan. Many of those dogs will wind up elsewhere, just like they did on tsunami Friday, March 11th. It wasn't only Stern Grove. We couldn't find a parking space near Bernal Hill!

No one looked at canine behaviors resulting from curtailing off-leash activities, either. My wonderful AAT dog Winston was hyperactive when we adopted from ACC. He'd been given up by a family who loved and trained him well, but they weren't able to give him the time or space to run that energy off at full tilt for a hour or two every day until he matured. So more dogs will be given up. Less dogs will be socialized. And San Francisco will join that postal service list of cities with a lot of dog bites. I realize that this is not the concern of the federal government, but some consideration should be shown to the very city that actually gave you the land! The GGNRA should be a friendly neighbor. Urban Park

Fort Funston is an urban park, not the pristine wilderness the NPS is used to managing. Several times a year old explosives are found and detonated on this very contaminated former military base. It's only about a block away

from a densely populated city. The GGNRA shouldn't treat it like a wilderness park, where hunting dogs just might be the only legal dogs. Fort Funston is a place for people to decompress and regroup for the stresses of big city life during a serious recession. Even Congress stipulated that the uniform management mandate "shall not be exercised in derogation of the values and purposes for which these various areas have been established." Recreational Mandate When the lands were given to you, the GGNRA was mandated to maintain the historic recreational uses, which included off-leash dog walking. It is obvious that the attempt a couple of years ago to remove "recreation" from the name was a tactic to undercut the protections for recreation contained in the enabling legislation.

Enhancements Yes, it is true that more people than ever are walking their dogs at Fort Funston, especially on the weekends. Currently the GGNRA allows off-leash recreation on less than 1% of their land. Because of its popularity, off-leash areas need to be increased not reduced. There also needs to be a provision for portions of future lands (such as all those acres in San Mateo being added) to be allocated to off-leash recreation.

If the GGNRA really believes there's a problem, they should find much less expensive and restrictive solutions, e.g., better signage, fences or shrubbery to more clearly delineate the off-limit zones, as well as an education program, perhaps with local dog groups.

It would also really help to publicize areas as being off-leash. It would let people know up front that if they go to this portion of the GGNRA, e.g., Fort Funston, they will encounter dogs there. If they don't want to be around dogs, unlike us, they have the other 99% of the GGNRA to visit! The GGNRA has so much acreage, why can't we be good neighbors and share just some of that acreage with nature, people and dogs?

Very truly yours

Sheila Mahoney

cc: Senator Dianne Feinstein Senator Barbara Boxer Congresswoman Nancy Pelosi Congresswoman Jackie Speier Secretary Ken Salazar Jon Jarvis, Director NPS Christine Lehnertz, NPS cc: Senator Leland Yee Senator Mark Leno Assemblymember Tom Ammiano Mayor Ed Lee Scott Wiener David Campos

Correspondence ID: 4576 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

I live in San Francisco and have been enjoying the GGNRA since the early 1970's, both with my dogs, particularly at Ft. Funston and Crissy Field, and in the Marin headlands, where I usually take longer hikes without my dogs. I am a Senior Citizen now. I am a Sierra Club member and hike leader, including leading canine hikes. I am also a birdwatcher who has enjoyed observing birds in Central America and Africa as well as at home in the Bay Area. I am a supporter of foundations for Pt. Reyes and many other environmental groups, which included the Golden Gate National Parks Conservancy until I felt excluded by the Conservancy.

I do not agree with the current GGNRA preferred alternative. I support a modified Alternative A (the No Action alternative), and think that new land areas in San Mateo county should be assessed on a site by site basis, with an effort made to find areas for on leash use, and hopefully some for off leash use as well. I also don't think there should be elimination of all dogs if there are problems with non-compliance, since that can be addressed without punishing the responsible majority of people with dogs, such as by more education and monitoring, and enlisting the use of the dog community to help with these things.

I believe that the DEIS has failed to evaluate impacts on the human environment. The parts of the GGNRA within San Francisco need to be evaluated and preserved as a heavily used urban area. San Francisco gave up all of its ocean beaches to the GGNRA, but beaches are important for everyone: people with dogs, children, picnickers, horse riders, kite fliers.... Scientific evidence hasn't shown that the snowy plover needs all of the beaches of San Francisco to survive, and there are lots of beaches for the snowy plover in less populated areas. And people are an endangered species in the urban environment too - there are so many stressors - and dogs have been shown to benefit people in many ways, for mental and physical health. And healthy dogs need to get lots of exercise, which requires running. I myself as a Senior citizen keep mentally and physically alert through the sport of dog agility, which requires a very fit dog. In the past I've been able to enjoy the cultural benefits of urban living while still being able to keep myself and my dog physically fit by lots of walking and running, and I think San Francisco is a very special city because we have had this wonderful lifestyle, and I hope it can continue. I believe that the GGNRA should live up to the founding agreements made with San Francisco that the people of the Bay Area would continue to be able to use the GGNRA lands for recreation, including dog walking. Through the years I have seen changes in usage and in erosion of the cliffs (a natural process, but one that I believe does require safety measures). But I believe it is unjust for the GGNRA to avoid dealing with these problems by choosing what is probably the largest user group to eliminate. Costs are certainly an issue in this economically

hard-pressed time, so I would suggest ways to have the users contribute more directly to the GGNRA, in addition to our Federal taxes. I have participated with the Ft. Funston Dog Walkers in clean up days which helps educate people as well as helps make up for some peoples carelessness. I would like to contribute again to the Conservancy, and would suggest more reaching out to dog owners with educational activities. I would also suggest raising money by considering areas where parking would need to be paid for, such as on top of the bluff at Ft. Funston. There could be free parking for handicapped people who wouldn't have the option of parking less conveniently and walking along the beach, and there could be a yearly parking pass. And there should be a few short term free parking sites, to allow people a chance to stop and look at the great view from the viewing platform adjacent to the parking lot Commercial dog walking has increased drastically and has led to Ft. Funston being overcrowded at times, though I still feel safer with the dog walkers there than at times with hardly anyone there. I would suggest a permit system, such as is used in the East Bay Regional Parks. It might also be advisable to limit the numbers of dog walkers at a time by having the walkers get time slots, perhaps by lottery.

I think some of the problems at Ft. Funston are from lack of active management. A long time ago I had heard that areas would be cordoned off for restoration and then re-opened, but I haven't seen this happening. I also think there should be a formal policy that only well-socialized dogs should be off leash in the crowded areas of the GGNRA, such as Ft. Funston and Crissy Field. There should be more outreach to educate people, by signs but also by education days. San Bruno Dog Obedience School has a great program for all types of dogs and might be interested in doing outreach about the need for obedience training . And for the unsocialized people whose dogs create problems for us all, these people should be investigated when there are complaints and kept from coming to the GGNRA with off leash dogs.

Thank you for the chance to share my observations and suggestions.

Sincerely, Linda Wilford San Francisco, CA 94116-3.426

Correspondence ID: 4577 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean

I am writing to express my concerns regarding your proposed closure of most of the areas currently available for off-leash dog-walking at Fort Funston. I have read through the Draft Dog Management Plan and I also

attended the Open House at Fort Mason on March 2011.

I have been walking my dog at Fort Funston for the last 15 years and am very familiar both with the terrain and with Fort Funston's history with regard to off-leash dog-walking over that period of time. Although I regret GGNRA's proposed dog-walking restrictions in many of the areas covered by the Management Plan, I am limiting my comments to the restrictions proposed for Fort Funston because I believe that they cannot be justified by GGNRA's own research or objectives and will result in significant hardship for San Francisco's dog-owners.

Of the available alternatives, I believe that the NPS should adopt Alternative A (no action) with regard to Fort Funston because it does the most to preserve off-leash areas for dogs. In my opinion, Alternative E is misleadingly titled as providing "Most Dog-Walking Access" because in fact the areas open to dog-walking would be less than those under Alternative A. I urge the NPS to clarify this point to the public and to take the possibility of confusion into consideration when reviewing public support for Alternative E.

Principal Reasons for Favoring Alternative A

1. Importance of preserving Off-Leash Areas for Dogs. Other than the horse, it is difficult to imagine another species that has had as lasting and beneficial a relationship with humans than the dog. It's important that the NPS balance many factors when considering the appropriate use of lands under its purview. However, just as the NPS takes into consideration threats to endangered species, it is entirely appropriate that the NPS also consider our species' obligation to provide adequate exercise for a species whose ongoing contributions to humankind cannot be over-stated. The fact is that requiring dogs to get virtually all of their exercise at the end of a 6' long leash is simply cruel. Dogs cannot get their natural exercise needs fulfilled walking at the pace of a human. The opportunities for off-leash exercise for dogs are already extremely limited in San Francisco and elsewhere and will become more so if the NPS management plan is enacted. Fort Funston has long been one of the few areas in San Francisco where dogs can enjoy off-leash exercise with relatively few negative impacts to the environment and disruption to other users. It should be managed in a way that will allow it to continue to fulfill this important purpose. Indeed, this is a cultural resource in its own right and deserves protection.

2. Absence of Critical Habitat Protection. At the open house held at Fort Mason, one of the senior rangers confirmed that there were few, if any endangered flora at Fort Funston because of decades of urban and natural degradation beginning with the area's use as a military complex. I have also not seen anything in the NPS Report that suggests otherwise, other than

declaratory general statements that there would be some adverse impacts. Yet, the NPS's preferred solution would close the entire area to off-leash dog walking.

As for fauna, where bank swallows or other birds nest on a seasonal basis, the NPS has a reasonable solution that adequately balances competing interests by simply closing those affected areas on a temporary basis to off-leash dogs or, if necessary, to any dog-walking activity.

3. Closure will simply lead to concentrated degradation in areas that remain open. The extremely limited opportunities for dog-walking in non-urban outdoor spaces in San Francisco will guarantee Fort Funston's continued use as a dog-walking area by area locals, regardless of which management plan is adopted. The NPS's preferred plan, in which off-leash dog-walking areas are restricted to the beach and to one area adjacent to the parking lot, will simply concentrate that usage to a much smaller area, thus magnifying both environmental impacts ' to the extent that there are any ' and the likelihood of conflict between dogs and people.

4. Closure violates one of the four outstanding values to be protected by the GGNRA in the 1972 enabling legislation. It is important to recall that the GGNRA, including Fort Funston, was originally intended as an urban recreation area. It should not be viewed in the same category as other non-urban National Parks covered by the NPS. As an urban outdoor recreation area, it fulfills an important function in allowing urban dogs and their urban human owners a rare opportunity to get out and stretch their respective legs. That function should not be jeopardized or restricted, absent compelling reasons to do so ' reasons which the NPS has not shown with regard to Fort Funston.

Ve truly yours, Misha Weidman

Correspondence ID: 4578 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Frank '

As you know, I participated in the discussions in 1978-79 that lead to altering the rules for dogs in GGNRA. I also chaired the large public meeting 10 years ago at the Golden Gate Club in which the Advisory Commission recommended the Rule-Making process.

I have been to most of the 21 areas described in the Draft EIS. I have been through the Draft EIS, and heard a presentation by your staff on the issues. I

have been in touch with 15 former Advisory Commission members regarding this subject.

After what I think is due consideration, I have concluded:

I favor Alternative D.

Yes, I well know that compromise is often a good thing. And I signed on to the recent statement from 16 members of that former Advisory Commission, advocating accommodation. But I cannot advocate that GGNRA chisel on its core mission, to preserve the resources for future generations. After all, that is what National Parks are for. Historically, that is why GGNRA was established.

Two parts of my background contribute to my opinion.

First, I am a runner/jogger. As such I get accosted by dogs several times a week. I have been severely scratched, knocked down, and bitten. In each case, it was by a friendly dog under voice "control". I am now completing my 75th year, and I take a blood thinner. Being knocked down is a scary prospect.

Second, I was raised on a farm in a valley where most everybody had dogs. We did. But the ethic was strong that one did not keep a dog on a property that was too small. It was unacceptable for a dog to have to use the property of others on which to run, and that included the public's property. The ethic was an accommodation to the neighbors, but also best for the dogs to have room to run.

There was then an organization which enforced that ethic, called the Society for the Prevention of Cruelty to Animals ("SPCA"). If a dog was being housed on property that was too small for proper exercise, the SPCA would call on the owner, and help swap the larger dog for a smaller one. It was done to preserve the health and happiness of the animals. Two runs a day are not enough for a dog kept in an apartment. I have often wished that San Francisco had such an organization.

Dog owners have no trouble voicing their wants, but in San Francisco there has been no voice speaking for the well-being of the dogs.

In my opinion, the dog issue is a social issue, which NPS should not be called upon to solve. But I do sense that the movement for more dogs, and bigger dogs, is starting to swing the other way. I now see fewer dogs, and dogs of more modest size in all areas outside of San Francisco.

Bottom line- I think GGNRA should be governed by the same regulation as

all other NPS units.

Thank you, Frank, for your consideration of the above.

Rich

Correspondence ID: 4579 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My name is Alan Michels, I live in the Cow Hollow neighborhood of San Francisco. I have been a resident there since 1992. From 1971 -1992 I lived in Marin County.

I have had dogs all my life. I've always carried a deep respect and concern for wildlife and the preservation of natural areas. I take my dogs weekly to Crissy Field, Lands End, Fort Funston, Sweeney Ridge and occasionally I go to Muir Beach. As a responsible dog guardian, I keep my dogs under voice and sight control at all times, clean up after them and keep my dog out of the fenced dunes and vegetative areas. It is crucial for my dog walking friends and me that areas like Crissy Field, Lands End, Fort Funston, Sweeney Ridge, the Marin Headlands and Muir Beach remain open for off leash dog walking access.

I do not agree with the GGNRA's current preferred alternatives as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The rationale provided in the DEIS to allow for a change in the current 1979 Pet Policy doesn't appear to be based upon sound science and long-term monitoring of site specific conditions.

The Department of the Interior deemed a recent study by the National Park Service on the environmental impact of an oyster farm near Point Reyes to be biased, mistake ridden and lacking basis. It seems the '2400 page "study" of canine impact to GGNRA has been slanted in a similar manner to meet a predetermined agenda.

As presented in the draft EIS, the proposed dog management plan eliminates dog-walking (on and off leash) access for all new lands. The GGNRA's mission applies equally to new lands as well as existing lands and it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands. I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas. I am a donor to the Natural Resources Defense

Council, as well as PETA. Responsible dog guardians as myself sometimes find it difficult to know what areas to avoid. I think the GGNRA should provide better signage and create environmental barriers, such as the vegetative barriers surrounding the tidal marsh at Crissy Field.

As a responsible dog guardian and advocate for animals, I know it is crucial that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment. Without a doubt, having off leash areas for dogs to socialize and exercise is the foundation to a happy and well-adjusted dog. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dogs and dog guardians will not have ample opportunity to exercise and recreate.

Having a place where my dog can play, exercise and socialize with other dogs keeps my dog happier and calmer. As a responsible dog guardian, I know it is important that my dog remain well behaved and trained in an urban setting and getting plenty of exercise and socialization is the foundation to a well adjusted dog. Some areas within the GGNRA also serve as a place of solitude for me and provide me with a very important peaceful and safe outdoor space and experience within the San Francisco Bay Area, a large metropolitan area.

Some specific problems with the DEIS include the following points. Please revise the DEIS to correct these errors.

This draft EIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the draft EIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs can be- and most of us are, good stewards of our environment. The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this largely perceived problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. The draft EIS should include an alternative along these lines. The proposed "compliance-based" approach has potential to work, if it is improved to include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

The draft EIS also doesn't seem to recognize that many areas of the GGNRA are located in or next to neighborhoods in San Mateo and San Francisco Counties. The draft EIS excludes the quality of the urban environment from its scope, saying it's not significant but the reality is that the GGNRA provides much needed open space in a major urban area. This omission is concerning because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The "human environment" that the EIS is required to study is exactly the dynamic interrelationship between GGNRA and our neighborhoods.

The draft EIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific information that supports the specific bans on off leash dog walking areas. Further, there is also insufficient documentation that considers all the other park visitors that disturb and could also impair the natural resources, be they other wildlife, mother nature, families and children, large groups of tourists trampling in the wildlife protection area at Crissy Field, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad new limitations are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. Lets not kid ourselves. Degradation to the environment has been caused mainly by the human species. The draft EIS needs to provide full disclosure to the public and decision makers. If dog-related disturbances are having a significant negative effect on wildlife, for example, the draft EIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. People need to know this information to be able to comment meaningfully on the draft plan and EIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone ' so that an informed decision can be made.

And lastly, after much consideration, I support a modified Alternative A, the No Action alternative. Alternative A should be modified to include appropriate areas for dog walking on "New Lands", Cattle Hill, Mod Point, Milagra Ridge and Sweeny Ridge, and on Pedro Point Headlands which is about to become part of the GGNRA. If this is not possible, due to defining the No Action Alternative, as the 1979 Pet Policy, then Alternative C should be modified to resemble Alternative A with the inclusion of "New Lands", Cattle Hill, Milagra Ridge, Sweeny Ridge and Pedro Point Headlands as described above.

The draft EIS is biased against and does not take a hard look at the No

Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site-specific information that these areas are inappropriate for continued dog walking.

Sincerely, Alan Michels San Francisco, CA 94123

Correspondence ID: 4580 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

This is the third letter I have written about the Dog Management Plan. My concern is: who will be reviewing the submitted comments and who will make the decisions affecting the final plan.

Since the science of your draft has been repeatedly called into question, I believe an independent panel should review and assess the comments so that there will be some credibility for the final selected alternative. This draft plan is so contentious that an independent outside group is necessary for community acceptance.

Thank you.

Sincerely,

Sally Cancelmo

Correspondence ID: 4581 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My name is Mary Fergus and I am a twenty three year old lover of dogs. My family has always had a loving and loyal dog, even before I was born. As I understand it, my parents were considering having children; the story then goes that my mother decided to test my father with the responsibility of a dog. I suppose he passed because about a year later they had me.

My dog Sophie was a wonderful liver spotted Dalmatian. She was as loyal as they get, and we grew up together kind of like sisters. She was such an

important part of my life. I remember being able to go to Crissy Field and Alta Plaza and play with her off leash. It was such an integral part of my childhood and something I hope to share with my children.

Since Sophie, my family has had two more dogs. A chocolate lab named Grizelda (quite possibly the love of my life), and a goofy fellow Italian Spinone named Raphaelo. We got Grizzly about a year before Sophie died. Some of the best memories I have with my dad and my childhood, were going to Crissy field in the morning with my two dogs and my father. We would go at about 5am when the air temperature is below 50 degrees and the water temperature is always around there. My dad, the young puppy, and I would go swimming while my loyal dog Sophie would sit watch on the beach. Further restrictions on off leash policies would not have allowed me to have that unique experience with my dad and my two best friends.

Now our second dog Grizelda is getting a little bit older, and has an aforementioned companion, Rafaelo. Rafaelo is such a happy young dog and loves to greet every one and every thing he sees. But he is a massive dog; though he probably has the intimidation factor of a Chihuahua, the reality is he is very large and needs lots of exercise. He is a growing boy and brings joy to my family and everyone he meets. New off leash policies would prevent him from being able to frolic happy and free with all of his puppy friends.

To keep a dog and his owners happy and healthy, the dog must have access to off leash walking. For me and my dog walking friends, going to Crissy Field is a necessary part of our day. We love the place and so do our dogs.

Instead of taking away off leash areas, I think the GGNRA should consider adding new areas, and providing better signage and environmental barriers like the ones at Crissy Field. The draft Dog Management Plan and the Draft Environmental Impact Statement does not evaluate the value of these recreational activities and does not adequately consider alternatives such as environmental barriers and providing better signage and education to the public.

Moreover, there is inadequate consideration of the impact of restricting off leash dogs on east beach at Crissy Field on the families that gather there for recreation. Both of my children grew up sharing Crissy Field east beach with their first dog. During many months of the year central beach is not safe because of the high tides. The proposal does not adequately investigate the impact on families of having to use Central Beach year round rather than east beach. There is also no science based explanation for moving off leash dogs off east beach. Please evaluate these alternatives and impacts. Major urban areas such as San Francisco need more places to recreate with dogs

off leash, not fewer.

The GGNRA was created with the purpose of providing recreational opportunities for people. This includes off leash walking at sites like Crissy Field. The citizens of San Francisco benefit greatly from these opportunities. Please do not restrict off leash walking on these sites.

Respectfully, Mary Fergus San Francisco, California 94115 CC:
Representative Nancy Pelosi, 8th Congressional District of California,
House Minority Leader, U.S House of Representatives Ken Salazar,
Secretary of the Interior Jon Jarvis, National Park Service Director Crissy
Field Dog Group

Correspondence ID: 4582 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Comments on Draft Dog Management Plan/Draft Environmental Impact Statement

Dear General Superintendent Dean:

In 1973, the San Francisco ballot measure F to transfer city lands to the GGNRA included an endorsement from Mayor Joseph Alioto, Congressman Phillip Burton, Congressman William Mailliard, along with 69 other notable individuals including Dianne Feinstein, In!-ir L. Burton, Willie Brown and a wide range of organizations, that read:

"The GGNRA is a national urban park established in 1972 by congress to preserve 34,000 acres of land and water in San Francisco and Marin for recreational use by all citizens." "Support national recreation area on your doorstep!"

I believed these leaders who clearly stated the GGNRA would be "for recreation use by all citizens," and I voted for the transfer of city land the NPS. Other voters agreed and the measure passed with 75% approval. Now I regret this vote, since the NPS is proposing to restrict recreation on land once owned by the city and used for recreation when the city controlled it. Ceding city land to the Park Service was supposed to add recreational opportunities for San Franciscans, not subtract opportunities from active use

Adding insult to injury is the inadequate GGNRA DEIS that fails to analyze the potential impacts on neighboring city parks of the DEIS' alternatives that propose severe restricti(n:E; to recreation on NPS land. As a user of my

local park, Stern Grove, and an advocate to:- more open space in San Francisco, I strongly object to the failure of the NPS to examine how the preferred alternatives will impact the use of local parks by the dog community, and what the consequences will be of that increased use on the visitor's experiences and city maintenance costs.

People and dogs will not just disappear because the NPS limits the off-leash use on GGNRA land, nor should the city have to absorb all this activity into our city system. I do not own a dog, but I do support the rights of all dog owners to use both the locally and nationally owned open spaces in San Francisco to exercise their dogs and to have an adequate amount of space for off-leash recreation. The GGNRA must propose a more relevant active recreation policy that appropriately addresses the needs of all park users in San Francisco, without undue burden on the city to compensate for an overly restrictive NPS policy, that was based on a seriously deficient DEIR.

In light of this failure, I request the following actions be done:

1. Require the GGNRA DEIR to complete a comprehensive assessment of all the impacts of any GGNRA recreation policy on San Francisco, including quantifying the current baseline uses and number of users in all city parks and open spaces, and analyzing the potential impacts on these areas if recreational dog walkers are not allowed to use GGNRA sites. Impacts include, but are not limited to, analyzing increased volume of users in all city parks because of NPS proposed policies, and quantifying increased costs to maintain city areas.
2. Until the analysis of city park impacts is completed with the appropriate new alternatives derived from this work, the only acceptable preferred alternative is A, "no change," to protect neighborhood parks.
3. Rather than constricting off-leash areas in the GGNRA, I support increasing appropriate active recreation including new off-leash areas in San Mateo County. Thank you for considering these comments.

Sincerely, Nancy Wuerfel Cc: Senator Dianne Feinstein Representative Nancy Pelosi Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Edwin M. Lee, Mayor, San Francisco Mark Buell, President, Recreation and Park Commission Fort Funston Dog Walkers (FFDW) San Francisco Dog Owners Group (SFD OG)

Correspondence ID: 4583 **Project:** 11759 **Document:** 38106
Received: May,16,2011 00:00:00
Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

GGNRA/DEIS made no good faith attempt to analyze potential impacts on neighboring parks if recreational dog walkers are displaced from GGNRA sites. The DEIS repeats, "An increase in visitation in nearby parks is not likely..." in many instances where an increase in visitation to nearby parks is assured. Consider, as only one example of many, Alternative C, the Preferred Alternative for Fort Funston. Most of the off-leash area at Fort Funston will disappear under this alternative. The many people who visit this heavily used park will not fit into the small areas remaining. Yet GGNRA doesn't acknowledge they will go elsewhere, and says, "An increase in visitation in nearby parks is not likely." (DEIS p 1530) This allows the unsubstantiated conclusion that the Preferred Alternative will have, "No indirect impacts in adjacent parks."

GGNRA/DEIS made no attempt to quantify the number of visitors who will be displaced under the various alternatives. The DEIS acknowledges that Fort Funston is "heavily used by dog walkers," (DEIS p 1530) without providing any useful data. No attempt is made to determine how many of these people will go elsewhere under Alternatives B, C, D, or E (the alternatives significantly restricting dog walkers). At minimum, an attempt must be made to determine a) how many people typically visit Fort Funston, b) how many people can be accommodated in the areas remaining open to off leash dog walking under each alternative, and c) how many people will be forced to go elsewhere to walk off leash under the various alternatives. The DEIS merely claims that Alternatives C, D, and E would not result in increased visitation in nearby parks. This is arbitrary and capricious since it is not based on any evidence.

GGNRA/DEIS analysis of potential impacts on neighboring parks is so casual that the study hasn't attempted to find out where people will go when displaced from GGNRA sites. The authors of the DEIS identify Lake Merced as the off-leash park nearest Fort Funston. In fact, the off-leash area at Lake Merced is seldom used because it requires a long walk from the parking lot, along a busy, dangerous street to get there. People displaced from Fort Funston generally go to Stern Grove/Pine Lake. This was demonstrated when Fort Funston was temporarily closed for the tsunami alert on Friday, March 11, 2011. The gardener responsible for Stern Grove reported that more than 200 dogs were in the off leash area that day, when the peak count of dogs in that area is 60 and that on weekends. The parking lot was full, with cars circling the neighborhood looking for parking. (West Portal Monthly, March 2011) The experience at Stern Grove/Pine Lake on March 11, 2011 is a preview of the results of drastically curtailing off leash recreation at Fort Funston.

The Stern Grove off leash area is limited in size. Crowding from displaced

dog walkers, as demonstrated on March 11, 2011, will have rapid and severe adverse impact on the park itself, particularly trampling the turf. Further, Stern Grove/Pine Lake contains a San Francisco Recreation and Park Department "Natural Area," in which native plants have been laboriously restored. Crowding with additional dogs and people will have an adverse impact on that Natural Area. Crowding will also have an adverse impact on the experience of visitors to Stern Grove/Pine Lake, both those with dogs and those without.

Displacement of people from Fort Funston to Stern Grove/Pine Lake is just one example of the DEIS failure to adequately analyze the impacts of various alternatives on neighboring parks. Natural Areas exist throughout San Francisco's city parks. There are 43 acres of official off leash area (Dog Play Areas) in San Francisco parks; 80% of that acreage is in or adjacent to a designated Natural Area. (NAP Draft Management Plan) Displaced dog walkers will have an adverse impact on Natural Areas and restoration efforts throughout the City. The DEIS has analyzed none of these impacts.

By treating the question of impacts on neighboring parks so casually, GGNR/DEIS badly underestimates the number of people who will be displaced by their alternatives, gets the location of those impacts wrong, and thus hasn't analyzed the impacts on neighboring parks from the various alternatives.

Because GGNRA/DEIS has no evidence guiding their evaluations of whether their alternatives will displace people to neighboring parks, they give contradictory answers to the same question. When discussing potential impacts to Lessingia on page 1311, the Preferred Alternative (C) at Fort Funston "may cause some of the dog walkers to visit other locations." People will go elsewhere but there will be no adverse impact because there is no Lessingia at Lake Merced. But when discussing potential impacts on visitor experience in nearby parks on page 1530, exactly the same Preferred Alternative (C) at Fort Funston leads to, "An increase in visitation in nearby parks is not likely." Here GGNRA needs to claim dog walkers would not go elsewhere in order to claim there would be no adverse impact on visitor experience at Lake Merced. There is real irony here. DEIS/GGNRA claims off leash dogs will have adverse impacts on Lessingia at Fort Funston, where there is no Lessingia and no record that Lessingia was ever there. But the same off leash dogs, if displaced to Lake Merced, will have no adverse impacts on Lessingia even though Lessingia definitely grew at Lake Merced historically, and likely grew specifically in the off leash area at Lake Merced (on "The Mesa"). (USFWS 2003, p25-27, Figure 1 p 5)

Only Alternative A, no change, will have no adverse impact on parks near Fort Funston. Again, Fort Funston is just one example of the failure to analyze impacts on neighboring parks. The DEIS is equally casual about the

other sites in the GGNRA.

If you add some off leash recreation to the GGNRA sites in San Mateo County to Alternative A, No Action, you will have a truly preferred alternative.

Sincerely,

Keith McAllister Oakland, CA 94611

Cc: Senator Dianne Feinstein Representative Nancy Pelosi Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Fort Funston Dog Walkers (FFDW) San Francisco Dog Owners Group (SFDOG)

Correspondence ID: 4584 **Project:** 11759 **Document:** 38106

Received: May,16,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

I write in support of adopting a Dog Management Plan for the GGNRA.

My interests in the GGNRA are as a San Francisco resident, a frequent park visitor and a volunteer participating in wildlife monitoring and stewardship activities. I enjoy the park for the unique opportunities to experience the natural and cultural resources and I appreciate the values of our National Park System.

I concur with the assessment that the natural and cultural resources and park visitor experiences have been, and continue to be, negatively impacted by the presence of substantial quantities of domestic dogs, both on-leash and off-leash, within the GGNRA. On many occasions my own park experiences have been negatively affected by the presence of dogs. I have had personal conflicts with dogs and their owners/guardians as well as being witness to conflicts between dogs and wildlife. While I am supportive of many aspects of the Preferred Alternative, I have the following comments to offer: Baker Beach ' The Preferred Alternative for Baker Beach is problematic for several reasons. Splitting the beach into leash-only and no-dog areas will lead to confusion, non-compliance, visitor conflict and continued management problems. Furthermore, allowing dogs near the creek outlet, an area often used by shorebirds, will increase the potential for wildlife conflicts. As a means of eliminating these problems and of creating more opportunities for visitors to enjoy dog-free National Park experiences, I suggest designating the entire Baker Beach area as a dog-free zone.

Lands End ' I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Sutro Heights Park' I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Ocean Beach ' I support the Preferred Alternative for Ocean Beach. To improve upon the Preferred Alternative, I suggest using symbolic fencing and adequate signage to delineate the south border of the ROLA. A simple post and cable fence could be placed along the border from the sea wall to the plover sculpture. A well defined border will help to reduce compliance problems and visitor conflict.

Additionally, I suggest changing the name "Snowy Plover Protection Area" to "Wildlife Protection Area". A designation of Wildlife Protection Area would be inclusive of all wildlife species that use the beach habitat area.

Ft. Funston ' I support the Preferred Alternative for Ft. Funston. To improve upon the Preferred Alternative, I suggest installing a fence, with access gates and adequate signage, along the border of the ROLA north of the main lot. A borderline fence will clearly delineate the boundary of the ROLA and will minimize compliance problems and visitor conflict. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Additionally, I suggest aggressively restoring the coastal scrub habitat throughout Ft. Funston. Plant and animal species, as well as park visitors, have been displaced from Ft. Funston over time as dog play activities have increased. A proactive effort must be made to bring back the visitors who are interested in proper stewardship of this area of the park. General Comments Commercial dog walking should not be allowed. Commercial dog walking does not relate to the purpose and mission of the National Parks. Commercial dog walking provides no service or benefit to park users, has negative impacts on park resources and park visitors, and serves only for the capital gain of private enterprises at the expense of the American public.

Commercial dog walking will require additional annual expenditures for administering and overseeing a permitting process, additional law enforcement, additional resource maintenance and additional public relations.

The DEIS estimates that over 1000 dogs will be commercially walked within the GGNRA daily (p. 63 p. 276). Commercial dog walkers, with up

to six dogs, will negatively impact the experience of park visitors on trails and in other areas of the park. If permitted, commercial dog walking activity will increase within the GGNRA and will displace park visitors, of all legitimate user groups, from areas of the park. Commercial dog walkers will dominate the ROLAs, displacing other park visitors. Commercial dog walking vehicles will occupy parking spaces resulting in fewer spaces available for park visitors. If allowed, commercial dog walking operations will have a dominant presence in some areas of the park thus affecting the overall character and ambiance of those areas.

Currently, commercial dog walking is not permitted within the GGNRA or any other National Park unit and there is no justifiable reason to do so. The NPS is well within the scope of its management directives to not allow commercial dog walking and I support this position.

Park visitors should be limited to one dog per visitor. On trails, visitors with more than one dog have a wider space requirement and have the potential to impact other park visitors by impeding their progress along the trail. In ROLAs, it is not practical to allow voice control of more than one dog per person. With few exceptions, dog handlers are not capable of managing more than one off-leash dog at a time.

The proposed compliance percentage of 75% is too low. Given that many hundreds of dogs are walked within the GGNRA daily, a 25% non-compliance tolerance would create a situation where park resources are significantly negatively impacted. The expectation should be that non-compliance is a rare occurrence and the compliance strategy should reflect that in its standard. The standard of compliance should be the same as for any other park rule or law. An acceptable rate of compliance is somewhere near 100%. A simple and effective reporting system should be established. The dog management plan should include a means by which park visitors can easily and effectively report non-compliant behavior. Park visitors are sometimes reluctant to report observed violations due to the time involved in making the report. A public reporting system should be incorporated into the plan that will be user friendly and workable. Such a system should require only a few moments of time and be an effective documentation of the violation.

The plan does not provide an adequate amount of hiking trails and picnic areas where visitors can enjoy a dog-free, National Park quality experience. Within San Francisco, the plan provides no significant area where park visitors can spend the day hiking and/or picnicking in a dog free environment. A solution to this problem would be to designate all of the coastal bluff areas, from the Golden Gate Bridge to and including Baker Beach, as a dog-free zone.

Sites Specific Comments Ft. Mason ' I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Field WPA ' The DEIS indicates that the east boundary fence will be relocated 200 feet eastward at a position 900 feet from the NOAA pier (p. 60). The language of the plan should allow the National Park Service flexibility in determining the exact location of the fence and consideration should be given to the visual penetration effect as well as the geographical conditions of the immediate area.

Under the preferred alternative, off-leash dog activity directly adjacent to the east boundary fence will pose a visual threat that will penetrate into the Wildlife Protection Area, effectively rendering a portion of the eastern WPA as non-viable habitat during daytime use hours. Given this concern, the fence should be placed a reasonable distance eastward, beyond the actual 900 foot border line, to allow for an adequate buffer zone.

Additionally, the geography of the area of fence placement is somewhat complicated by non-uniform conditions which include a variety of substrates, varying elevations, several lobes of fenced dune habitat areas, and a variety of pedestrian pathways. Consideration should be given to all of these conditions and fence placement should be such that will accommodate ease of pedestrian traffic flow while maintaining adequate protection of the WPA.

When installed, the fence should extend to the water at extreme low tide. Crissy Central Beach ' The Central Beach ROLA should be fenced and gated. Fences at the west and east ends should extend to the water at extreme low tide. Adequate buffer zones (-300ft) should be included beyond the west and east boundary fences to protect the WPA and the lagoon outlet from the influences of excessive dog play activity. Access points from the promenade should be gated. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

Crissy East Beach ' Fencing should be installed to protect the lagoon outlet zone. Outlet areas from bodies of water into bays or oceans are of high habitat value. The outlet zone should be included as part of the protected lagoon area and similarly fenced.

Crissy East of the Lagoon ' The Freshwater Swale should be designated on the area maps as a no dog zone.

Crissy Promenade ' I support the Preferred Alternative with the following

changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Crissy Airfield ' The foot paths that cross the airfield are multi-use trails and should be designated as on-leash areas. Allowing off-leash dogs on the airfield trails will lead to user conflicts. The airfield ROLA should have some type of physical barrier along the boundaries. A physical barrier will clearly define the ROLA area. Clearly defined boundaries will maximize compliance and minimize conflict. Consider a movable barrier that can be set up and taken down as needed. Signs should be posted clearly identifying the area as an off-leash dog play area and stating the voice and sight control rules.

The eastern portion of the airfield should be a no-dog area. The Crissy airfield attracts a wide variety of grassland bird species, including rare vagrants, and is a popular venue for wildlife viewing.

Ft. Point ' I support the Preferred Alternative with the following changes: no commercial dog walking, one dog per visitor, compliance rate of 95% or greater, and establishment of a simple and effective reporting system.

Correspondence ID: 4585 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I've been in the Bay Area since 1993, and my husband, Marc Weibel, is a life-long Bay Area resident who has lived in San Francisco since 1990. We have lived in the Sunnyside neighborhood in San Francisco since 2007. We are current members of several local environmental organizations, including the Golden Gate Audubon Society, WildCare, and the Marine Mammal Center, as well as national organizations such as the Nature Conservancy and the Ocean Conservancy. We have contributed to the Golden Gate National Parks Conservancy and California Audubon, and have participated in California Coastal Clean Up Day. We participate on the local birdwatching e-mail list, SFBirds, on Yahoo Groups. In short, we appreciate our local natural environment, and we love birds.

We are also dog owners ' our current dog is a rescue from Northern California Family Dog Rescue, and our previous dog came from the Milo Foundation.

I am writing to comment on the proposed changes to the rules concerning

dogs in the GGNRA. Since Ocean Beach is our main destination within the GGNRA, I will restrict my comments to the proposal for that area.

We visit Ocean Beach from one to three times each week, usually walking along the beach between Sloat Boulevard and Judah Street. As birdwatchers, we enjoy seeing the Snowy Plovers and other shorebirds. As responsible dog owners, we always keep our dog on leash, pick up waste, and do not disturb the wildlife. We treasure our ability to visit this unique location with our dog, and we respect other people, wildlife, and the law.

We are very disappointed that the GGNRA prefers Alternative C, which would prohibit dogs from Ocean Beach south of Stairwell 21.

We support the year-round leash law proposed in Alternative E, which would protect the habitat and migrating shorebirds, and allow responsible dog owners to continue to use Ocean Beach.

1. Safety As a woman who often walks alone with her dog, I find Ocean Beach invaluable. To me, it is a singular location in the city of San Francisco not only due to its beauty, but because the 3.5 mile round trip between Sloat and Judah is flat, free of traffic, and where, with my dog, I feel safe to walk alone. Losing the ability to walk on Ocean Beach with my dog would be an immeasurable loss to me. Without my dog, I would not feel free to walk Ocean Beach.

Not only does my own dog make me feel safer, but other people walking dogs makes me feel safer. The stretch of Ocean Beach between Sloat and Judah is little used, and without the people with dogs, there would hardly be anyone left. I would feel too removed from civilization to feel safe walking alone.

Many who use this part of Ocean Beach are dog owners, and I've noticed that many are women walking alone with their dogs, like me. I did not see anything in the EIS that considered who the current users are and who would be affected by the ban of dogs from Ocean Beach, so I wanted to provide this data point. Restriction to the Coastal Trail, as proposed in Alternative C, is not a comparable experience. The trail's proximity to 35 mph traffic, the occasional camper in the dunes, and its distance from shore and shorebirds, makes it less safe, beautiful, and peaceful.

2. Enforcement Whichever alternative is chosen must be enforced. Without enforcement, I predict that those who disobey the dog laws will continue to do so. If the preferred Alternative C is selected, only those of us who obey laws will end up being punished, and none of the goals of the new rules will be achieved. In the years that I have been visiting Ocean Beach, I have only seen park rangers on the beach once -- January 10, 2010. (It was such a

notable event that I wrote it down.) If there were more enforcement, I wonder if we would need to be having this discussion now.

3. "No-Dog Experience" The EIS describes surveys that asked people whether they support off-leash dogs or not. I did not see any questions asking whether people wanted a dog-free experience, yet the GGNRA is making policy decisions based on this position. I saw no data to support the claim that this desire exists within the community.

Even given that some people don't like dogs, Ocean Beach is wide and open enough that no one need interact with a unwanted dog, except perhaps during a very high tide. Many people do enjoy dogs. We do not allow our dog to approach strangers, but strangers often approach us to meet our dog. (It happened even more often with our previous dog, Prunella, who was in a dog wheelchair. She was very popular.) We love seeing dogs on the beach, especially during the years when we didn't have one of our own. We love the chance meetings we have with our fellow San Franciscans and their dogs, and the people we meet appear to feel similarly. I feel that Ocean Beach without dogs would be a very different, less friendly place indeed.

4. Share Ocean Beach While I see some dog owners like myself who comply with the law, of course there are many who do not. While I do not approach every non-complying owner, I am happy to have had one friendly, positive conversation with one that resulted in her leashing her dog. It gave me hope that increased education (along with enforcement) can result in everyone sharing the beach ' people, wildlife, and dogs.

We love Ocean Beach ' it's where my husband asked me to marry him. Our wedding party was at the Beach Chalet. Afterwards, we had a bonfire ' in one of the approved fire pits, of course ' so that we could celebrate with our dog. We hope to always visit Ocean Beach, and always to be welcomed with our dog.

This past winter, we were birding Crissy Field, and saw banners in the Warming Hut that promoted "parks for all forever." These banners saddened me because I felt that GGNRA's "all" did not include us. I hope the alternative that the GGNRA chooses takes into consideration the needs of all its users, including responsible dog owners.

We hope you will choose Alternative E. Please continue to allow dogs on leash on Ocean Beach.

Thank you for reading my comments.

Sincerely, Christine Martinez Begle

Correspondence ID: 4586 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My husband (64) and I (67) have owned our small (lot is 25 x 100 ft.) home in the Glen Park/Bernal neighborhood of SF for 30+ years. 2 years ago we adopted a rescue dog for companionship and exercise. Because of our ages we initially looked for an older dog, but fell in love with Penny (now 3, a 60 lb. Chow/Shepherd mix, see pix) at the SPCA pet fair and embarked on a new, demanding and immensely satisfying relationship.

Over the past two years we've spent countless hours exploring San Francisco with Penny, but our favorite spot has been Fort Funston because of the dog-friendly environment where we can go for long walks together and she can socialize with other dogs and humans off-leash. Twice a week she goes there in a play group with a dog-walker (I quite often tag along because it's so much fun watching them play together ' Penny's best friend is a year-old Weimie she's known since he was 2 months old), and 2 - 3 times a week she goes there with Mark or me; other days we go to city parks for her daily 2 mile walk. For a year and a half we went to A Better Way for Dogs and learned voice control and how to work with her on and off leash, and we've worked hard to be responsible dog-owners. As long-time environmentalists (I'm a Sierra Club member) we also try to be responsible stewards of the natural world (we used to go to Ocean Beach to do clean-up in the `80's ' young people thought we were weird!), so we keep a close eye on her when we're out there, and have worked hard to exercise voice control when she's off-leash.

I've attended 2 NPS meetings as well as the SF Supervisors meeting to learn about the Draft Proposals for the GGNRA and have been utterly dismayed at the extreme reductions in on/off,leash recreation outlined for dogs and their guardians. After studying the Fort Funston ROLA proposals it seems clear that no dog behaviorists were included as DEIS advisors, because neither the on or off-leash areas have any shade!!! Also, as a senior, I'd risk injury trying to get Penny to the beach (which as you know is often unusable because of high tides or bad weather) on- leash, and because the trails would be crowded Penny would be anxious, esp. on-leash, and more likely to be aggressive (evincing possible "leash rage"). The ROLA proposed next to the parking lot is completely inadequate for the number of dogs using Fort Fun and an invitation to non,compliance which under the current proposal would eventually result in dogs being banned entirely. The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for

recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents, or to evaluate the impact on local parks of such a drastic change in existing policies..

The recent brochure I got in the mail from the Golden Gate Conservancy was headed "Parks for all Forever" ' unfortunately as dog-owners we feel excluded from this generous vision by the DEIS. Having read quite a bit about NPS dog policies, it seems clear that our dog, and therefore we, are not welcome in the national park system, with very few exceptions, most of them a thousand or more miles away. Obviously there are areas where dogs shouldn't go, for endangered species preservation or their own well-being. However, in general, we don't understand why the policy doesn't allow leashed dogs wherever humans are allowed, and why there are not many more ROLAs in the NPS as a whole. Since some 15% of Americans own dogs, it does not seem unreasonable that 1% of Parklands would be set aside to allow access for them too, and to this end we think:

- 1) The National Park Service should treat the GGNRA as a model for developing more enlightened dog policies throughout the park system, which could be co-ordinated with the "Let's Move" efforts which our First Lady Michelle Obama is so actively involved in, encouraging families to get outside with their dogs, educating them about dog behavior, and providing room for off-leash recreation (you can't play catch when your dog is leashed!)..
- 2) Hire dog behaviorists to improve the existing models Fort Funston, Crissy Field and other important GGNRA dog recreation areas including the New Lands. Point Isabel Regional Shoreline is a sophisticated model of multi-recreational use which could be drawn upon and then used throughout the park system. Consider experimenting with a "green" approach to dog waste, providing compost stations like those coming into use in Canada, or biodegradable bags which could then be composted instead of going to landfills.
- 3) Signage and fencing or other barriers for areas closed to the public and/or dogs should be abundant and educative.
- 4) Remove the "poison pill" plan with regard to compliance.
- 5) Require all dogs using the GGNRA to display a current license together with contact information in case of emergency and to be under voice control when off-leash.

6) Set up a low-cost automated permit system for dogs (\$1 - \$2 a day per dog) which will help defray any extra maintenance costs.

7) At Ocean Beach either: retain and expand existing snowy plover protections to include human disruption as well as heavy equipment, kite flying, beach fires and other known factors affecting the bird population. Where feasible create plover-friendly areas including oyster shells for cover. Or, recognize that Ocean Beach may never become a nesting area because of the heavy human presence there. Is it true that only 7 plovers have been sighted in the annual counts since the dog ban was instituted? Maybe GGNRA plover restoration efforts should be concentrated elsewhere instead of closing off 2 V2 miles of a beach much needed for human recreation, with dogs welcome on-leash and off in a larger designated ROLA..

After much thought, I support Alternative A, the No Action alternative, and retaining the existing 1979 policy with changes as outlined above. It's especially important that the New Lands policy be changed to include respect for existing uses of the lands including on and off-leash dog-walking. I see many dog-walkers at Fort Funston who drive up from San Mateo County because there are so few off-leash areas there, and the New Lands proposal would exacerbate this situation. State and county parks in San Mateo have extremely restrictive dog policies ' perhaps an enlightened NPS policy would have a trickle-down effect in this regard.

It's important to remember that dogs have important well-documented roles to play in providing companionship, exercise and protection (I feel much safer hiking now that I have a dog) for their humans.

Other changes we would support:

Pit-bulls (and other breeds specified in local ordinances) must be neutered or on-leash. Owners/walkers must have a leash for each dog and a bag for feces pickup.

Dogs may be off-leash during daylight hours only

Dog caregivers must leash excitable dogs within 50' (? not sure how far) of horses, hang-gliders, and other stimuli known by the owner to cause prolonged barking or aggression. When sharing paths with young children and bicyclists, owners must leash their dog and/or withdraw a safe distance to reduce other users anxieties. Owners are expected to act as good-will-toward-dogs-ambassadors, recognizing that many people have a high level of anxiety about dogs. Inappropriate or aggressive behaviors which caregivers don't take immediate steps to control should be reported and may result in the dog and its caregiver losing access privileges.

Those reporting such behavior can call a hotline and give an incident report describing the dog, its care-giver, time/place and vehicle license number if known, as well as a brief description of the problem. If urgent they should call 911.

No off-leash dogs in or within 25' of parking lots.

We hope that you and the Park Service can find ways to reconcile the many conflicting interests surrounding this issue, and develop a more humane and sensible approach to the problem which will continue to welcome us and our dog in the GGNRA.

Sincerely, Judith D. Kucera and Mark Hein,

cc The Honorable Nancy Pelosi, Secretary Ken Salazar, Mr. Jon Jarvis, NPS Director

Correspondence ID: 4587 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: I would like to add my name to the list of dog owners who are asking you to leave the areas now available to voice controlled, unleashed dogs,as is.

There is known evidence that a socialized dog is a better dog. The effects of constant leash control is damaging to the animal if it is not allowed to run or play without it. The dogs that are given the freedom and joy of being off leash are healthier and happier. Their owners are too.

The areas that you are proposing to close to these dogs and dog owners are the last bits of land that have given us joy. If you restrict use to the limited areas you propose you will find an over population of dog owners and dogs crowding the little space because it will be the only land open to unleashed dogs. It may cause more chaos and complaints of another sort than the ones you hear at present. And what will you do then? Ban all dogs from being off leash forever in the GGNRA?

I understand that we are not the only users of the GGNRA. I have heard that non-dog owners do not appreciate a cavorting dog but is that enough reason to change the present land use? I have heard that one reason for the proposed change is to avoid injury to park personnel who have to help dog owners find their lost pets. I have also heard the reason the restrictions are proposed is because dogs damage the plantings and land. Really? Don't we humans do the most damage? Are you going to ban us? And aren't park

personnel also risking injury when they look for a lost child?

Please leave the use of the land as is.

Sincerely, Christa Wulle, PHD

Correspondence ID: 4588 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

When my 3 children begged me to get a puppy 2 years ago, it took me a considerable time to decide with a main consideration how can we give him the best life while I have 3 young children of my own. We adopted Khai jiew a few months later. He is my first dog.

I immediately looked into where to take him out for a daily run since he is a herding dog. I know he needs his off-leash run for at least 30-60 min a day. I took him to Fort Funston and felt in love with the park. I often cannot take him to city parks where there are a lot of people laying down for some sun. If dogs like him do not have access to off-leash area, they will cause more behavior problems including barking and biting, which we do not want to have in the metropolitan area. When I heard about proposed restriction off-leash dog walking, I do need to stand up for all dogs even though I am often shy, a typical immigrant Asian woman, when it comes to speaking up. Please consider the following comments and requests.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Thank you for your consideration.

Sincerely, Angkana Kurutach San Francisco, CA 94115

Correspondence ID: 4589 **Project:** 11759 **Document:** 38106

Received: Jun,01,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean and members of the committee developing the Dog Management Plan:

The purpose of this letter is to express my concerns about the proposed Dog Management plan alternatives. I am a tax paying citizen of the United States and City and County of San Francisco. I have a dog and I use the GGNRA with my dog for healthful exercise and recreation. The DEIS serves to inappropriately limit the rights of the tax paying public.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions.

It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I want

to protect the GGNRA's natural resources, I believe options other than restricting dog-walking access should be considered first. I favor an approach that truly balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such alternatives as a reasonable option.

The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and is not based on any documented impacts of non-compliance, just the mere fact that non-compliance occurs. Because it will change the status of areas from off- to on-leash or on-leash to "no dogs allowed" automatically and permanently if non-compliance is alleged, it will deny the public the chance to comment on these major changes when they occur. That violates the law that requires public comment when a change is either significant or highly controversial, as these changes would clearly be. It must be removed.

There are, however, some improvements that a modification could address for the positive, specifically as they relate to Crissy Field:

1. The crushed gravel promenade from the parking lots west past the grassy meadow is of particular concern. There are dogs on and off leash, bicycles, runners, pedestrians, children learning to ride bikes, etc. Surely you have seen on weekends it is a mob scene and recipe for accidents. Leashing dogs in this area and eliminating bicycles would certainly cut down on the risk of injuries to all users of the promenade.
2. Enacting the 1979 Pet Policy would return the west beach to a leash free environment all year round providing more areas to ease the density of dogs rather than commit them to smaller confines as proposed by GGNRA.
3. Professional dog walkers should be limited to a manageable number of dogs per person. Some are extremely conscientious and keep the dogs engaged. But there are also the dog walkers who meet up with other dog walkers and stand around and chat while 15 to 20 dogs run wild around

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

I uphold my responsibility to manage my dog under voice control and on

leash. I believe it is incumbent on all dog guardians and handlers to do the same and maintain peaceful existence at all GGNRA sites. I do not feel it is appropriate for GGNRA to arbitrarily take away citizens rights as indicated in the draft plan. There are times in the day that the majority of people using Crissy Field and other beaches in the GGNRA are people who are with their dogs. Removing dogs from the beach will overburden the city parks and other GGNRA sites and negatively affect the health of the people and dogs in San Francisco. The exercise that we humans receive exercising our dogs at the beach positively contributes to our overall sense of well being and physical condition.

After careful consideration, I support a modified Alternative A (the "No Action alternative) that codifies the 1979 Pet Policy as it was originally written (there is no evidence in the DEIS to support the closures of beach access because of the presence of snowy plovers), and that includes off- and on-leash access on GGNRA lands in San Mateo and on new lands that become part of the GGNRA, especially those areas in both that have traditionally had dog walking. Ms. Barbara Wong 94102-4352 San Francisco;

Correspondence ID: 4590 **Project:** 11759 **Document:** 38106
Received: Jun,02,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The

Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

Exclude speculative, exaggerated, biased, or misleading statements and studies. ? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

28% of households have a dog. I do not have a dog. I am an amateur birder. I support dogs off leash in these areas.

Sincerely, Edmund L. Merrill

Correspondence ID: 4591 **Project:** 11759 **Document:** 38106
Received: May,18,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

A committee of the National Academy of Sciences recently evaluated the work of National Park Service scientists regarding oyster culture in Drakes Bay. NAS reported in a news release, May 5, 2009, that, National Park Service scientists, "selectively presented, overinterpreted, or misrepresented the available scientific information," and, "exaggerate[ed] the negative and overlook[ed] potentially beneficial effects." The GGNRA/DEIS in a similar manner selectively presents, overinterprets, and misrepresents the available scientific information regarding recreational dog walking, and exaggerates the negative and overlooks the beneficial effects of off leash recreation in the GGNRA.

The DEIS uses many literature citations to make the case that dogs have serious adverse impacts on wildlife and the environment in the GGNRA. Indeed the list of references in the DEIS is 27 pages long. Unfortunately,

when closely examined, there is very little evidence behind most of the claims of adverse impact. There is little site-specific documentation of harm caused specifically by dogs. And there is no documentation or quantification of harm caused by all other park visitors. So, dog-caused problems cannot be evaluated in context. The DEIS is selective in what literature it cites, in a manner prejudicial to people who use the GGNRA for recreation with their dogs. Further the citations are selected and presented to mislead the reader. I list below a few of the misleading literature citations.

Misleading Literature Citations in the DEIS

Page 414 1. DEIS: Discussing geologic resources at Fort Funston. "Dogs walking or running through dune areas ... accelerate the natural sand migration process (NPS 2010b)."

The citation is simply wrong. NPS 2010b is Golden Gate National Recreation Area: Environmental Impact Statement for the Extension of Historic Streetcar Service. NPS 2010b says nothing about dunes at Fort Funston or elsewhere, nor anything about dogs; NPS 2010b discusses the area around Fort Mason, which is about as far from Fort Funston as you can get and still be in San Francisco. There are no dunes there.

Further, a citation to a document that is 31 MB long requires page number or other locator. Otherwise it is not a real citation; it's virtually impossible to check. Fortunately, there is a pdf version of NPS 2010b available online which is searchable. Searching for the words "Fort Funston," "dunes," and "dogs," demonstrates conclusively that 2010b contains nothing about dogs or dune migration at Fort Funston.

The false citation to NPS 2010b is made in support of a totally fabricated piece of pseudo-science. There is no evidence that dogs accelerate dune migration at Fort Funston. GGNRA staff just made that up. It is easy to observe dune migration at Fort Funston. The most dramatic dune migration over the last ten years can be seen in the restricted areas with very little dog (or human) traffic.

2. DEIS: Still discussing Fort Funston. "Nutrient addition to soils is at high levels at this site due to the high number of dogs at the site. Major impacts on soil chemistry would be expected at this site due to nutrient input from dog waste and urine."

This quote cries out for a literature citation, but there is none. GGNRA has presented no evidence of any kind that supports the claim of significant alteration of soil chemistry at Fort Funston due to dogs. GGNRA was repeatedly asked during Negotiated Rulemaking for evidence to support this claim, but none was provided. It is clear no such evidence exists; GGNRA

staff just speculate. That's not science. And it's misleading to state that nutrient input from dog waste is significant when there is no supporting evidence to cite.

Page 461 DEIS: "A substudy of the San Francisco Sewage Master Plan determined that bacterial contamination of waters off Ocean Beach was significant due to dog waste deposited along the shoreline (NPS 1999, 21)"

This is a very misleading reference to a nonexistent document. NPS 1999 is not "a substudy of the San Francisco Sewage Master Plan;" NPS 1999 is Natural Resources Section, Resources Management Plan, Golden Gate National Recreation Area, December 1999. It is likely that no such substudy of the San Francisco Sewage Master Plan exists. During Negotiate Rulemaking in 2007, I challenged GGNRA's claim to dog waste contamination at Ocean Beach, writing, "Unless the substudy that made this claim can be presented for examination, this claim should be stricken from the Attributes Table." The NPS reply was, "[I] put in a call to SF PUC Water Quality Bureau and others to try track down substudy; so far no luck ' they are not aware of any such study. We may have to strike this from Attributes table if neither we nor city can locate. (SES)" It is now 2011. No substudy has been produced, but GGNRA continues to make the claim and refer to the nonexistent document, with a citation to make it appear that the claim comes from a real document.

Not only is there no evidence of significant dog fecal contamination of Ocean Beach, there is good evidence that the dog fecal contamination doesn't exist there. SFPUC monitoring of San Francisco beaches for e. coli and enterococcus bacteria from January 1 to March 17, 2007 showed that off leash beaches do not have higher fecal contamination than beaches that do not allow dogs. China Beach (no dogs) and Aquatic Park (no dogs) had higher bacterial counts than Ocean Beach and the off leash section of Baker Beach. Baker Beach at the Lobos Creek outlet had consistently higher counts than other sites. The creek is fenced and no dogs are allowed in Lobos Creek Valley adjacent to the creek. (This early 2007 reporting period was around the time the GGNRA claim of dog fecal contamination showed up in the Attribute Table for Fort Funston.)

SFPUC monitoring of e. coli and enterococcus bacteria at San Francisco beaches continues, and up-to-date data is available on the SFPUC website. The April 19, 2011 data show Ocean Beach is still extraordinarily clean: most readings are the lowest reportable category'less than 10 bacteria per 100mL. No reading at Ocean Beach is higher than 10. The bacterial counts at "no dogs" beaches remain high, including Aquatic Park and Baker Beach at the Lobos Creek outlet.

GGNRA/DEIS had up-to-date, accurate data on bacterial contamination at

Ocean Beach available. Any member of the public can go to the SFPUC website. Instead of using the real data, GGNRA/DEIS made up evidence from an alleged pre-1999 document that does not exist.

Page 1115 1. DEIS: "It has been suggested by several sources that dogs, 'particularly while off leash, increase the radius of human recreational influence or disturbance beyond what it would be in the absence of a dog' (Sime 1999, 8.4; Miller et al. 2001)"

Miller et al. does say, "if recreationists allow their dogs to roam freely off of a trail, the 'area-of-disturbance' increases, because the dog is no longer on-trail," but this doesn't come from any evidence in their study. By lifting this one quote from Miller et al., and not sharing with their readers the main thrust of the paper, the DEIS has turned Miller et al. upside-down. The real content of Miller et al. , which comes from their research data, is, "...in grasslands for vesper sparrows (*Poocetes gramineus*) and western meadowlarks (*Sturnella neglecta*), the smallest area of influence and shortest flush distance and distance moved resulted from the dog-alone treatment, and these responses were greater for the pedestrian-alone and dog-on-leash treatments." and, "for American robins (*Turdus migratorius*), the area of influence, flush distance, and distance moved did not generally differ between the pedestrian-alone and dog-on-leash treatments." (Emphasis added)

In other words, Miller et al. says dogs disturbed the birds less than people with dogs or people alone, and robins were disturbed as much by people alone as by people with dogs. DEIS does not report what Miller et al. actually says about dogs disturbing wildlife.

The quote beginning "particularly while off leash..." does come from Sime 1999, but Sime offers no studies or citations to support her claim.

So, Sime offers no evidence whatsoever; Miller conducts field studies with real dogs and real birds. DEIS chooses to accept Sime, and misrepresent Miller.

2. DEIS: "'At some level, domestic dogs still maintain instincts to hunt and/or chase' (Sime 1999, 8.2)"

This is quoted from the abstract to Sime 1999, before specific studies are discussed. Sime offers no studies, citations, or evidence in the body of the study to support the statement.

3. DEIS: "...dog presence in and of itself may be an agent of disturbance or stress to wildlife' (Sime 1999, 8.3)"

Note the "may" in the quote. Again, Sime offers no studies, citations or evidence behind the statement, which comes from the introduction, before specific studies are discussed.

4. DEIS: "...and animals that are prey of wild canids may perceive dogs as predators and may be subject to nonlethal, fear-based alterations in physiology, activity, and habitat use (Miller, et al. 2001)"

This statement is not in Miller et al. This appears to be a falsified citation. However, with two "may"s in the sentence, it would be hard for the sentence to be definitively false in any case. Non-falsifiable statements are not scientific.

5. DEIS: "Generally, potential impacts on wildlife as a result of interactions with domestic dogs could be broadly classified as falling into three categories: harassment, injury, or death. Harassment is the disruption of normal maintenance activities, such as feeding, resting, grooming, and can include disrupting, alarming, or even chasing wildlife.... If dogs chase or pursue wildlife, injuries to wildlife could be sustained directly or indirectly as a result of accidents that occur during the chase rather than through direct contact with the dog."

DEIS provides no citation for this statement, but it is lifted directly from Sime 1999, p 8.4, without attribution. The direct quote from Sime 1999 reads:

"Potential impacts of domestic dogs on wildlife could be broadly classified as harassment, injury, or death. Harassment is the disruption of normal maintenance activities, such as feeding, bedding, or grooming. It can take the form of disrupting, alarming, or even chasing. If dogs chase or pursue wildlife, injuries could be sustained directly or indirectly as a result of accidents that occur during the chase itself rather than direct contact with the dog."

This is called PLAGIARISM, and is not generally accepted in the scientific world.

6. DEIS: "Authors of many wildlife disturbance studies concluded that dogs with people, dogs on leash, or loose dogs all provoked the most pronounced disturbance reactions from their study animals' (Sime 1999, 8.2)"

Sime says this in her abstract, but, again, her paper offers no studies, citations, or evidence to support the statement. The specific studies she discusses in Sime 1999 do not make such a claim.

7. DEIS: "Dogs can disrupt habitat use, cause displacement responses, and

injure or kill birds' Sime 1999, 8.10)"

The cherry-picked quote is accurate, but misrepresents the content of Sime 1999, pages 8.10-8.11. The literature cited by Sime shows no bird injured or killed by a dog.

Here are the studies discussed in Sime 1999, pages 8.10-8.11:

a) Hansen and Grant (1991) state that "pedestrians generated the most negative responses" by birds, but Sime jumps into that same sentence with her speculation that "presence of dogs may (emphasis added) intensify bird responses to pedestrians."

b) Burger (1986) studied effects of human activity on shorebirds. People walking accounted for 43% and 50% of disturbances in two bays studied, followed by fishermen, airplanes, and then dogs.

c) Hoopes (1993) studied human-related disturbances of piping plovers: pedestrians 86%, pets (not just dogs) 7%, vehicles 5%, kites 2%. Ten observed chick mortalities were caused by cat, herring gull, human handling, and off-road vehicle'none by dogs.

d) Yalden and Yalden (1990) studied nesting golden plovers. Adult plovers spent 11% of the day responding to people, but disturbance by dogs is not quantified.

e) Keller (1991) lists dogs as disturbers of eider ducklings (after fishing and people walking, and not ranked against windsurfing and boating) but doesn't quantify the dogs' effect.

f) Baydack (1986) disturbed lekking sharp-tailed grouse with various treatments. Females were displaced by all disturbances, including parked vehicles and snow fencing. Males were flushed only by humans and leashed dogs. He does not compare humans alone to humans with dogs. g) Patterson (1952) found that humans flushed sage grouse on a lek (dogs not involved.)

h) Ingold et al. found that nesting ptarmigan in Switzerland slowed their heart rate when approached by a hiker.

Most of these studies do not feature dogs. Contrary to the citation, in none of the studies were birds injured or killed by dogs.

8. DEIS: "Birds usually are more sensitive to dogs approaching than to human beings (Andrusiak 2003)."

In this case GGNRA/DEIS is actually citing itself. Hatch(GGNRA) said

dogs disturb Western Snowy Plovers more than people; Lafferty cited Hatch; Andrusiak cited Lafferty; GGNRA/DEIS now cites Andrusiak. Full circle. Andrusiak does not claim to have any evidence that birds are more sensitive to dogs than to people.

9. DEIS: "Dogs disturbing foraging birds may diminish the birds' foraging time and can result in a loss of energy required to migrate, significantly affecting the birds' survival during migration (Andrusiak 2003)."

DEIS blatantly misrepresents Andrusiak. Andrusiak actually categorizes the statement, "Dog disturbance (excluding other sources of disturbance) to overwintering or migrating birds affects their survival and/or reproductive success," as, "Unknown/no data." (Andrusiak 2003, Table 8) Of course the sentence quoted from DEIS, can't be falsified, since it contains "may" and "can result." That is: The sentence has no scientific content. Still, DEIS completely misrepresents Andrusiak, attributing to her a statement she does not make.

10. DEIS: "A study (note singular) by Forrest ... showed dogs have no impacts on diversity or abundance of birds and small mammals... Still, some studies (note plural) have shown that 'local wildlife does not become habituated to continued disturbance' by dogs (Banks and Bryant 2007, 612)"

A clearcut demonstration of prejudice against dogs by the authors of DEIS. They cite one study showing no impacts and one that (maybe, but not clearly) shows impacts. They then present it as one vs. more than one. But it's still just one of each.

Page 1263

1. DEIS: "During the monthly bird surveys at Fort Funston, dogs were recorded in restricted areas and on many occasions, both dogs and humans were observed inside the restricted areas (USGS 2004)"

USGS 2004 (Wildlife Response to Habitat Restoration in Fort Funston, Golden Gate National Recreation Area, California) does say this. But the "restricted areas" in USGS 2004 are not the bank swallow protection area discussed on p 1263 of the DEIS, where the citation appears. They are not the restricted area displayed on DEIS Map 16-A. USGS 2004 is talking about the restricted area(s) covering most of the northern end of Fort Funston, the native-plant-restoration restricted areas. The restricted areas at Fort Funston changed radically between USGS 2004 and DEIS (2011). Compare Figure 2 in USGS 2004 with Map 16-A in DEIS to see the radically different restricted areas. The USGS 2004 restricted area is not shown on DEIS maps. DEIS deliberately confuses the two different

"restricted areas."

GGNRA may claim only the citation is incorrect; they meant to say NPS 2007e (Bank Swallow Monitoring at Fort Funston, Golden Gate National Recreation Area 1993-2006). That's still wrong. The data set (BS data public) that underlies Table 2 in NPS 2007e says that in many years no dogs were seen in the bank swallow restricted areas, with a total of three (3) for the six years 2001,2006. No justification for "on many occasions."

Page 1302

1. DEIS: "...heavy off-leash dog use increases deterioration of native dune communities (USGS 2004)"

This quote from USGS 2004 comes from the pre-study general introduction to the paper, not from the study itself. USGS 2004 offers no evidence of effects of off-leash dog use on dune communities, and cites no sources on this subject.

2. DEIS: "...intensive trampling of vegetation by dogs weakens vegetation in a similar manner as trampling by humans (Sime 1999)."

DEIS simply misquotes Sime. What Sime actually says, page 8.9, is: "Sensitive alpine environments...summer growing seasons are so short, physical disturbance by dogs (through digging or bed-making) could damage vegetation..." Only sensitive alpine environments are mentioned, and trampling is not mentioned, neither by dogs nor by humans. It's pretty obvious that trampling can damage vegetation, but DEIS thinks it necessary to construct a phony literature citation to make the point.

Note that USGS 2004 makes the same erroneous citation of Sime 1999 that DEIS does. It appears that DEIS has copied the quote from USGS 2004, but presents it as a citation from Sime 1999, without actually checking Sime 1999. Such sloppy scholarship would not be acceptable in the scientific world. GGNRA/DEIS misrepresents the sources it cites. GGNRA/DEIS also selects in a misleading way which sources to include in its analysis, and omits relevant data in its possession. For example, the DEIS discusses bank swallows at Fort Funston on page 1263, claiming dogs disturb the swallows. The DEIS cites USGS 2004 and NPS 2007e, neither of which documents dogs disturbing the swallows. GGNRA/DEIS omits their own study which documents that dogs at Fort Funston do not disturb the bank swallows. 1994-95 Bank Swallow Annual Report, Nola Chow, 1996 was written by a GGNRA researcher as a report for the GGNRA. But it is not cited and does not appear in the 27 page list of references in the DEIS. Ms. Chow's research is "an inconvenient truth" that GGNRA deliberately omits.

I could go on, but I will stop now. Without such abuse of "science," including many misleading literature citations and selective reporting of data, the DEIS could not make its case for unmanageable adverse impacts caused by dogs. GGNRA should go back to the beginning:

a) Examine actual conditions on the ground at the specific GGNRA sites, b) Realistically analyze which adverse conditions are actually caused by dogs and dog walkers, and c) Examine what mitigation actions are appropriate. Until then GGNRA/DEIS has not analyzed Alternative A, No Action. The GGNRA/DEIS decision against Alternative A remains arbitrary and capricious, not based on evidence. Add some off leash areas in GGNRA sites in San Mateo County to Alternative A, No Action. Then with real analysis, the supplemented Alternative A, will emerge as the preferred alternative.

Sincerely,

Keith McAllister Oakland, CA 94611

Cc: Senator Dianne Feinstein Representative Nancy Pelosi Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Fort Funston Dog Walkers

Correspondence ID: 4592 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 26, 2011 Superintendent Dean,

Demographic I have been walking with my dogs at Fort Funston for about 15 years. I walk a couple times a week. My dogs are small Chihuahua terrier mixes. When I had larger dogs, I used to walk daily. I also take my dogs on leashed walks everyday in a well- landscaped neighborhood. Why do I bother to drive to Fort Funston when I have my own large enclosed yard & pleasant neighborhood streets? I enjoy the ocean view, the great horned owl, the dragonflies, the yellow tree lupine and other wildflowers, and most of all, the community of other Fort Funston visitors.

I grew up in San Francisco and am very familiar with its natural history, more so than many of the "environmentalists" who are fighting to drastically reduce or even ban off-leash recreation at Fort Funston. I grew up studying insects and later did my doctoral thesis on fly vision. Until a few months ago, I was a long-time member of several environmental groups such as the Sierra Club, Audubon, Nature Conservancy. I take many measures to reduce my environmental footprint. However, I have become reluctant to call

myself an environmentalist because of the radical environmentalists who seem intent on removing people from the parks. I have decided to not renew my membership to some groups, based on their local chapter's opposition to off-leash recreation in the GGNRA. I strongly believe people, recreation, and off-leash recreation are appropriate for Fort Funston, Crissy Field, Baker Beach, Lands End, etc. as well as similar sites in Marin County and San Mateo County, i.e. the small 1% of the GGNRA that has traditionally been off-leash. I support the "Parks to the People" motto of the GGNRA.

The GGNRA and some off-leash opponents state that seniors, ethnic minorities and others are uncomfortable around off-leash dogs. I bet some are, just like some white people are uncomfortable around dogs. However, although I'm not quite a senior (will be 60 next year), I am Asian-American and I frequent Fort Funston specifically because of the off-leash opportunities. It is important to weigh the opinions of the ethnic "minorities" who actually go to the park to enjoy off-leash.

The National Parks have a reputation of being unwelcoming to non-white ethnic groups. It would be a challenge to find a recreation that is more diverse than off-leash dog walking. Fort Funston has a better mix of Asians, Black Americans, Pacific Islanders, East Indian, etc. than you are likely to find elsewhere in the parks. Off-leash recreation is a success story in terms of the National Parks being welcoming to ethnic minorities.

Essential points about the DEIS

1) I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off-leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site-specific conditions. 2) It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe other options (besides restricting dog-walking access) should be considered first. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

3) The proposed "compliance-based" approach punishes many for the perceived transgressions of a few. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make

the plan work, not assume an adversarial relationship with failure the goal.

4) The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents.

5) After careful consideration, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative barriers, and education and outreach as part of the overall program.

Additional points

1) Off-leash recreation should NOT be held to a higher standard than other forms of recreation. All activities in the park have some environmental impact, whether it is visitor conflict in the picnic areas, drownings or fatal falls at the shoreline, drunkenness, trampling of vegetation at Crissy Field during Fleet Week, fuel consumed by boats ferrying tourists to popular NPS attractions like Alcatraz, etc. Good park management can mitigate these impacts. However, the GGNRA seems to have zero tolerance for any sign of off-leash dog incidents. The bad behavior of a few bad apples is used as justification to eliminate an entire class of well-behaved recreational visitors.

q Incident reports indicate that dogs and dog owners are generally very well behaved. The percentage of incidents involving dogs is very small considering the number of dogs in the park. 111 Off-leash recreation is being held to a higher standard when measuring "effect on wildlife." The DEIS indicates that protection of wildlife is a rationale for restrictions on off-leash recreation. Note that there is no scientific data indicating that dogs per se have caused harm to the snowy plovers, bank swallows, or other wildlife. This is in spite of the park and others who have been diligently LOOKING for evidence of damage, and in spite of the fact that wildlife and off-leash dogs have successfully co-existed for over three decades in the GGNRA. The turn of a plover's head, a movement or lack of movement (!), is considered by the GGNRA to be an "effect." In other national parks, when judging the appropriateness of a recreation, e.g. hunting, an effect is measured by whether the recreation affects the POPULATION count.

2) GGNRA Spokesperson Levitt was repeatedly quoted by the press stating, "The GGNRA is the only national park that allows off-leash dogs." This is a

false statement, and also reflect the lack of research & knowledge of the park staff There are about a dozen other national parks that allow off-leash dogs. These are parks with hunting, i.e. recreational visitors bring dogs to help them find animals and kill them. Off-leash recreation in the GGNRA is very harmless and humane compared to off-leash dogs with hunters.

Additionally, this misinformation sets the expectation that there really shouldn't be any off-leash dogs in the GGNRA. This expectation can increase visitor conflict, or increase the hopes of radical environmentalists that off-leash will be banned, rather than accepting the reality that there were off-leash dogs on these lands when the GGNRA accepted them, and there are off-leash dogs now.

3) The preferred alternative for Fort Funston is a poorly chosen site. The preferred alternative for Fort Funston confines off-leash recreation to the coldest and windiest area. We jokingly referred to this as the "tundra," and trudge through it to get to the protected areas, out of the cold near the trees or on the protected side of the hills. The most protected area, i.e. where it is comfortable to walk even during rain showers, is the horse trail on the eastern side, where the preferred alternative would completely ban dogs. The current status of off-leash should be maintained, since it allows a variety of landscapes and experiences.

4) The preferred alternative for Fort Funston restricts recreation from the northern end of the beach. The justification for this is unclear. Yes there are shorebirds there, but shorebirds and dogs have co-existed there for decades. Yes there are bank swallows there, but again, there is no evidence that dogs have harmed the bank swallows or the nesting sites (which are on sheer cliffs).

5) The DEIS has little or no scientific basis on which to restrict current off-leash recreation. I agree with other citizens have written letters with detailed analysis of how scientific studies were inappropriately applied to the GGNRA, misinterpreted, and how there is a lack of site-specific peer-reviewed studies demonstrating harm to wildlife or other natural resources in the GGNRA. The Department of the Interior has called for adherence to a policy of ethical scientific conduct. The DEIS has failed to meet that standard.

6) The evaluation of public comment and the DEIS needs to be done by an independent, neutral party. NPS staff is not neutral, having advocated for years against off-leash recreation. Their bias is reflected in the flawed DEIS interpretation of scientific studies. An independent body, with no conflict of interest, needs to do the evaluation. Additionally, there needs to be transparency in the process, with the public having timely access to any

information.

Suggestions for management of off-leash recreation

1) Enforcement of the existing regulations. There are already regulations against pet litter, aggressive behavior, etc. I have rarely seen a ranger on the trails at Fort Funston, and never seen anyone get a citation for dog litter. It's almost as if the GGNRA has intentionally let misbehavior occur so that they will have an excuse to get rid of dogs.

2) Rather than restrictions to protect potentially sensitive areas, consider landscape management. For example, create natural barriers by planting a border of coyote bush. The south end of Fort Funston has introduced coyote bush (the higher, shrub-like variety) which effectively discourages dogs and visitors from entering some areas.

3) Provide better website information, and signage at the park. ? Inform people there is off-leash dog recreation at specific parks. Although dogs are prominent at Fort Funston, one would never know that by reading the NPS website on Fort Funston. Based on the website information, a dog-phobic person would be unpleasantly surprised when he arrived at Fort Funston. By setting realistic expectations, visitor conflicts could be reduced. ? Post prominent signs to inform dog owners what behaviors are expected at the park. For some people, getting a dog and bringing it to the park is their adult re-introduction to the parks. As they enter the park they need to know that digging, chasing wildlife, etc. are not allowed.

4) Hire staff that is knowledgeable about dogs and urban recreation, and staff that has the expectation that visitors will bring dogs to the GGNRA. The GGNRA biologist Daphne Hatch has publicly stated that Ocean Beach would be a beautiful habitat without the people. That statement epitomizes the perception of staff that joined the National Park Service to work in the wilderness. The San Francisco Bay Area is not a wilderness, nor was the GGNRA established to create a wilderness. The belief that the GGNRA is a Yellowstone Park can color the perception of NPS staff. The city of San Francisco has a bigger population than the whole state of Wyoming. There are people here, lots of them. And many of them have dogs.

q For example, if one believes that national parks shouldn't have any off-leash dogs, then even providing a miniscule area for off-leash dog is considered to be a major compromise. The DEIS preferred alternative has taken the tiny 1% and cut it even smaller. The NPS perhaps feels they are giving us something. In truth they are taking away off-leash recreation that existed prior to the establishment of the GGNRA.

q During the Negotiated Rulemaking, members of the committee went on a

field trip to view the sites. At Ocean Beach, we watched as a visitor with a dog walked in the vicinity of a snowy plover. They didn't disturb the plover. Then a group of equestrians rode right through the area, and circled back in vicinity of the plover. We all watched in amazement, but the park ranger Eric LaSalle, Chris Powell and Daphne Hatch said nothing. About an hour later we were talking about the incident, and Daphne Hatch started saying, "when the dog disturbed the plover..." I corrected her by reminding her it was the horse, not the dog, that disturbed the plover. I think her slip of tongue illustrated how she perceived dogs, i.e. her memory was reconstructed to confirm her belief that dogs were harmful to wildlife and that they shouldn't be at Ocean Beach.

5) Institute a program where each dog owner is required to demonstrate her/his knowledge commitment to protecting natural resources, and skill in managing the dog off-leash, before being allowed off-leash recreation. "Voice control" should have a behavioral measurement, e.g. the owners hand on the dog's collar within one minute (this would require good recall, or a slow dog, or a fast-running owner). This would be analogous to the requirement for hang-gliding at Fort Funston, or requirement for obtaining a driver's license before being allowed on the road.

Thank you for your consideration. Karin Hu San Francisco, CA 94127

Correspondence ID: 4593 **Project:** 11759 **Document:** 38106
Received: Jun,02,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to strongly protest the efforts of the GGNRA in restricting dogs from running off a leash on GGNRA lands. First I would like to establish why the GGNRA was created: Congress created the GGNRA in 1972 to: "to provide public access along the waterfront and to expand the maximum extent possible the outdoor recreation opportunities available to the region." The proposed dog ban appears to be in direct opposition to that mandate.

1. Dogs are important companions to many people in our city and dog walkers are custodians of the land. They walk on it, love it and look after it, picking up trash, reporting dead animals, and any other problems. Dog owners are law-abiding citizens who by their presence on the GGNRA lands discourage crime of all kinds. It is in the interest of anyone who cares about open space to work together - with dog owners, including, believe it or not, bird lovers in protecting our waterfronts. The beaches are largely deserted except for people and their dogs with the exception of weekends

and then only when the weather is fine:.. rare in San Francisco!

2. The complaints from the Audubon Society and the Park Service that dogs are somehow a threat to the coastal areas is ridiculous and vastly overblown. Any instances of dogs harming birds are very rare and unusual, this can be addressed by proper dog training. As for disturbing the nesting sights this can be addressed through education and signage.

Plants should not take precedence over people in urban areas but live alongside people. We must not forget that we are a city and the same standards of preservation do not apply, as they would in a national park in the middle of nowhere...there must be balance between people and plants.

3. The GGNRA does not appear to be interested in making dog owners responsible for the behavior of their dogs and insisting that off leash dogs are well trained. Would you really rather take the easy path and just legislate against off leash dogs? I would rather see signs asking dog owners to always be respectful of the other users of the beach and not allow their dogs into the areas where the shore birds nest, an education campaign perhaps. Even a license system for owners to have their dogs off leash where they have to prove that the dog is properly trained (rather like a drivers license) might be a solution. Another idea is to limit the amount of dogs' one person can take to the GGNRA. I can see the problems when you have 10 dogs per person! These people are running a business; perhaps they should be treated as such. The rest of us are people who love the outdoors and love to walk in nature and we choose to do it with our faithful companions. We are the GGNRA's greatest allies. Surely personal responsibility with freedom is better for our society than yet more restrictions and legislation!

This proposed plan is discriminating against one type of person, namely a dog owner; even the coyote has more rights in the Presidio.

Dogs provide so much love and support to humans in so many ways; they need places to run free. A tired dog is a well-behaved dog!

Thank you for your kind consideration, Yours truly, Vivien MacDonald

Correspondence ID: 4594 **Project:** 11759 **Document:** 38106
Received: May,26,2011 00:00:00
Correspondence Type: Letter
Correspondence: As a lifelong dog owner and environmentalist, I am strongly opposed to reducing dog access within GGNRA. I strongly urge you to keep these things in mind when drawing up a new policy:

1. It's not possible to maintain a park in an urban environment as a pristine wilderness; the goal should be to balance recreational activities with environmental protections.
2. Changes to policy should be based on clearly documented evidence of impact directly by dogs. (The proposal seems to be based on a dislike of dogs, rather than honest scientific facts).
3. Dog owners make up a significant percentage of the population in this dense urban area and therefore deserve access to a significant percentage of parkland. I would argue that dogs should be given access to a larger percentage of GGNRA than is the case today. I think the goal should be to maximize, not minimize, access.

Dogs and humans have coexisted for millennia. I believe that we co-evolved together, and that neither species would be the same today if it weren't for the other. People get a lot of emotional and physical benefits to dog ownership and I think that your policy should be to nurture this relationship.

As a woman who often hikes alone, I feel safer on the trails when I have my dog with me. You would be limiting my access to the outdoors if you further restricted my ability to walk with my dog.

I support the enforcement of responsible dog ownership. Most dog owners take the time to train their dogs and clean up after them; those that don't should be ticketed. This should certainly include owners who allow their dogs to chase or otherwise harass wildlife.

I urge you to shelve this excessively lengthy document and start over, this time involving more public representation, including that of responsible dog owners.

Sincerely, Deborah Hill

Correspondence ID: 4595 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. The plan as proposed fails the fundamental goal of presenting a balanced evaluation of the criteria. In its evaluation of information and analyses the proposal and proposed options all assume that the goal is to reduce the existing off leash

and on leash dog access to the recreation area.

There are numerous examples of this one sided approach to the analysis. First, not one preferred option increases the allowed off leash land whereas there are many instances of the preferred option reducing both the off leash and on-leash access. Second, should the preferred option be put forth and fail (e.g. result in greater damage to the natural environment), there is not one proposed remedy that reverses the change to return to the current off-leash area. Instead, the proposed remedies all call for further restrictions.

Furthermore, this one sided approach is applied regardless of the actual status of the environment or area. The preferred option is either a further restriction to existing access, a reduction of access, or the complete elimination of access. This approach is applied regardless of the type of land in question., For instance, there are numerous developed areas with mowed lawns, picnic tables, and with no wildlife present. These areas include Ft Miley which has reduced access but is a manicured lawn, Ft. Baker which has a large lawn within a circular road surrounded by a luxury hotel, and Ft. Mason's great lawn which is a mowed and manicured lawn.

As a San Francisco resident I have frequented these areas, as well as other areas within the GGNRA for more than 15 years ' most of this time prior to ever owning a dog. In that time, I have yet to have or witness a conflict between a dog (or the dog's owner) and another patron of the GGNRA. An approach that serves to unreasonably apply a one directional approach to solving problems or issues inherently fails the standards that underlie the approach for drafting the DEIS. The only conclusion is that the proposed plan needs to be re-done to incorporate the balanced approach it purports to have. It needs to fairly evaluate options to address documents problems and issues and propose remedies that alleviate issues rather than blanket proposals to reduce or eliminate one of the main activities people engage in within the Recreation Area ' enjoying the GGNRA with their dogs.

Sincerely,

John Jankowski

Correspondence ID: 4596 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am a San Francisco resident and dog owner who has significant concerns with the DEIS. The draft EIS for the GGNRA's dog plan fails to make a

persuasive argument for the need to modify or change the existing policies. The analysis is flawed and poor, which is best exemplified by the analysis of the very few instances of negative incidents during 2007-2008. Table 9 documents the number of incidents across areas. There are firm numbers of incidents but no hard data for the number of visitors to each of the areas. Consequently no reliable conclusion can be drawn about the rate or incidence of issues and problems.

Usage listed for area is frequently moderate or high, yet many of these areas have no more than a handful of incidents. For a park receiving at the low end of the estimated range of 12.5 million visits, the total number of incidents based on Table 9 comes to 1,823 incidents spaced over a two year period, with more than 80% of those incidents (1,683 of the incidents) for leash law violations. That rate of violation comes to less than 0.01% of the minimum expected visitation to the GGNRA. To phrase the rate in slightly different terms, this means less than one incident for every 10,000 visits to the GGNRA. Taken further, and eliminating the leash law violations and focusing only on excrement, bit/attack, and rescue situations, the total number of incidents comes to 140 spread over two years. That rate comes to a documented incident rate of 0.0011%. That corresponds to approximately 1 incident per 100,000 visits to the GGNRA.

Now, I will admit my analysis has a flaw. It takes the numbers for two years of incidents and the estimated low attendance for only one year. As a result my numbers grossly overstate the number and rate of incidents per visit to the GGNRA. The appropriate analysis would result in an estimated, non-leash infraction incident per 200,000 visits to the GGNRA. Based on the data, the residents and locals within San Francisco and the environs of the GGNRA should be commended for their well-mannered and socialized animals. Also on the face of it, the preferred plan proposes changes to solve a problem that does not exist.

The GGNRA should return to the analysis and compare the number of incidents to a typical urban environment. In the unlikely event that the incident rate in the GGNRA is greater than a typical urban environment, then some action may be warranted. In fact, given the exceedingly low rate of issues given the recreation area's usage, an expansion of on-leash and off-leash usage should be strongly considered. From the DEIS, it appears that any options in that direction were discounted without any analysis at all. Thank you,

John Jankowski

Correspondence ID: 4597 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00

Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to make my feelings known about GGNRA's plans regarding dog walking. As a resident of the Bay Area since 1967, I have enjoyed wonderful walks in our parks, most notably Fort Funston when I first moved here and more recently, Milagra Ridge and Mori Point. I always share these walks with my various dog family members throughout the years. I am quite distressed that you plan to disallow not only off leash, but on leash as well.

Please don't eliminate the joy of 'man and dog' walking the beautiful hills of the GGNRA. Honestly, I can't believe this is even happening. Dog parks are fine for off leash activity, but nothing can match the thrill of nature-walking (responsibly, of course) with my little dog on leash-- out in the fresh air, with the Pacific Ocean to guide us. Bliss! Please consider the dedicated dog owners who treasure and respect our natural environment.

Thank you.

Morning Nichols

Correspondence ID: 4598 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Draft Dog Management Plan, Draft Environmental Impact Statement

Dear Superintendent Dean,

My name is James B. Frame, age 67, former employee of the Municipal Railway, City of San Francisco, now retired. I have lived in San Francisco for 46 years, and have owned my home in the northwest Bernal Heights for over 27 years. Since owning my home, I have had a number of active and well behaved and well trained dogs. Being a responsible dog guardian, I have always kept my dogs under voice control and in my sight when walking them in any area where they are off leash. At Fort Funston, where I walk my two dogs every day, I have always cleaned up after them, and kept them from passing into the fenced off areas.

The human animal bond is very important to me. It is important for my dog walking friends and me that areas like Fort Funston remain open for off leash dog-walking access.

At Fort Funston, considerable areas have been replanted, and there the

newly planted and developing areas are clearly indicated with environmental barriers. I find this very attractive, easy to see and respect. I applaud the work of those who have done this planting. As a concerned environmentalist of many years, I am delighted to see this work. It enhances the area and allows visitors to see sections of native planting take hold.

I might mention that at other areas of Fort Funston a number of years ago, fenced off areas (with dunes and ice-plant) were fairly clearly marked, but currently the fences and signs are in poor enough shape as to be quite unnoticeable. Removal of the ice-plant ground cover, which was put in by the Army prior to World War II has resulted in wind-blown sand drifts that are constantly shifting, covering trails and fencing. Newcomers to the area may be excused for not noticing which areas to keep out of. I consider these folks to be uneducated rather than irresponsible. Better fencing and signage indicating the current off-leash areas is clearly called for to maintain and protect the environment.

I do not agree with the GGNRA's current preferred alternative. It significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site specific conditions.

As presented in the Draft Environmental Impact Study (DEIS), the proposed dog management plan eliminates dog-walking on and off leash access for all new lands (additions to the GGNRA sometime in the future) within newly-acquired 4,000 acres of San Mateo County. The GGNRA's mission applies to new lands as well as existing lands, and it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands.

I am concerned about the long-term preservation of the GGNRA's natural resources, and I want to protect these important natural areas. Other options (besides restricting dog-walking access) should be considered first, however. I know it is crucial that our dogs be well-behaved and trained in order to peacefully co-exist in an urban environment. Adequate exercise and socialization is essential for a well-behaved dog. Having places where I can take long walks with my dog allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA to which we currently have access, I am concerned that many dog and dog guardians will not have sufficient opportunity to exercise and socialize their animal companions.

Having increasing mobility problems, I try to walk frequently and purposefully as often as I can, and the hike from the Fort Funston parking area to the on-leash-from-here sign to the north makes an adequate distance. I would not want to take that walk having to control two dogs on leash.

Their walking paces and needs are markedly different, and walking two on leash for that distance would be very uncomfortable for me. The dogs actually need more vigorous exercise than I can give them on leash. The current availability of paved trail and off-leash running at Fort Funston accommodates the recreational needs of citizens like myself quite well.

From maps I have seen, the so-called "preferred alternative off leash area" is bound by the large and always busy parking lot, steep cliffs and one paved walkway and one sanded path. Most of the day there are many dogs and walkers in that area now, but most of them are on their way heading to or from a longer walk. I am concerned that the number of dogs allowed to play off leash only in that area would increase, and the cliffs and the parking lot would become major safety concerns. Furthermore, the severe crowding together of exercise-needing and excited canines becomes a safety issue for both dogs and people as well. I feel that the DEIS has failed to analyze the impact of restricting the off-leash area at Fort Funston.

Another social aspect to Draft Dog Management Plan disturbs me. Our daily walks, necessitated by our dogs' need for exercise, allow us to get out of our homes and socialize with others. One has the option of avoiding socializing with others, but if one wants, it is always easy to begin conversations with other dog walkers. I am able to interact with people of diverse social classes and ethnic backgrounds, avoiding the isolation that often comes with urban existence. Indeed, many of the friends and acquaintances I have made since retiring have been made while pursuing this activity. I treasure this aspect of my frequent dog walks. I trust I speak for the other residents of San Francisco and San Mateo County that I meet daily.

Conversations are rarely if ever started between people who have dogs on leash. If the makers of the draft had any experience with dogs at all, they would know that leashes create tension in restricted areas. Dogs on leash become protective of their space and their human companions. For one thing, one doesn't know why a leash is being used. Is the dog aggressive? Is the dog untrained? Is the dog getting used to a new owner? Will dogs get defensive or protective? Will dogs tangle up if they are near? There are so many possibilities that people with dogs are far less likely to approach others when there are leashes involved.

Some areas within the GGNRA also serve as a place of solitude for me and provide me with a very important calm and safe outdoor space within the San Francisco metropolitan area. In an Open House put on by the GGNRA (at San Francisco State University), the public had an opportunity to observe the plans for changes at Fort Funston. The allowable off-leash area currently available at Fort Funston meets the recreational and social needs of people and dogs alike quite well. I feel that the "preferred alternative" choice that I learned of seriously failed to accurately analyze the recreational needs of

residents of this urban area.

I trust that the GGNRA, in developing a general management plan, will take into consideration and respect the specific character and situation of the Fort Funston Area. I fully support Alternative A'the No Action alternative of the DEIS, as it relates to Fort Funston. This DEIS and Plan does not recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document does not acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

The draft plan has the effect of punishing people because of a very small number of uneducated, insensitive or irresponsible individuals. A reasonable response to this problem might be to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA.

The proposed "compliance-based" approach should be modified to create a baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco, which, after all, donated much of the land to the GGNRA in the first place, not an adversary.

The people who put together this Draft Environmental Impact Study do not seem to realize that many areas of the GGNRA are located in or next to urban neighborhoods. The study excludes the quality of the urban environment from its scope, saying it is not significant. The Golden Gate National Recreation Area provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog-walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. One argument against off-leash dog-walking I have heard is the adverse effect on wildlife in the area. I have seen statements that the dogs disturb the nesting of bank swallows at Fort Funston. I don't understand this, having

experienced the co-existence of domestic dogs and the swallows for over 20 years. Indeed, the sightings of the swallows actually diminished for a short time after the ice- plants were taken out and before the native plants became established. I can only guess that somehow the plants were harboring the insects that the birds consume as food. Now that the native plants have established themselves, life goes on as before. The birds do not seem to be bothered by dogs. Their biggest problem seems to be the hawks and other air-borne raptors. Of course, this is only something I have noticed on my walks at the fort. It does not seem to be mentioned in the two-volume Study that has cost us taxpayers a five-figure sum. There is insufficient documentation that considers other impacts ? other park visitors that litter, disturb and impair the natural resources, other wildlife, such as hawks, coyotes and cougars, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and charity marathons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. The DEIS needs to provide full disclosure to the public and decision makers. If dog-related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone ' so that an informed decision can be made.

Lastly, there is an issue of crime. Fort Funston is adjacent to the city of San Francisco, which, lamentably, has a big crime problem. Excluding dog-walking from a large area will put users of Fort Funston at increased risk of falling victim to violent crime, such as assaults of various kinds and robbery. It has been my experience that the presence of dogs is a deterrent to many forms of crime. After much consideration, I support Alternative A, the No Action alternative and would also include the Newly-acquired areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra) in San Mateo County.

The DEIS shows a bias against the No Action alternative or variations on that alternative. There are other areas in the GGNRA such as Ocean Beach, where the existing 1979 Pet Policy has been working and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site-specific information that these areas are inappropriate for continued dog walking.

Respectfully, James B. Frame San Francisco, California, 94110

copies sent to: Secretary Ken Salazar, Department of the Interior
Christine Lehnertz, Regional Director, National Park Service, Pacific West Region
Jon Jarvis, Director National Park Service
Nancy Pelosi, Member, U.S. House of Representatives
Diane Feinstein, U.S. Senator
State Senator Leland Yee
State Senator Mark Leno

Correspondence ID: 4599 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: As a resident of San Francisco who has partnered with the GGNRA and the Parks Conservancy in the past (Red & White Fleet and Blue & Gold Fleet Alcatraz tours), I am writing to express my concern and dismay over the proposed Draft Environmental Impact Statement (DEIS) for Dog Management in GGNRA.

For nearly a dozen years I have walked my two beagles off-leash at Fort Funston and occasionally at Chrissy Field. It is a vital part of our recreation and exercise. The "preferred alternative" of the DEIS will make it nearly impossible for us to continue to enjoy the GGNRA open space in the way mandated by your own mission, "to provide for the maintenance of needed recreational open space" for the people of the Bay Area. Congress stated that the purpose of the creation of the park was to "assure the preservation of open space ... to provide public access along the waterfront, and to expand to the maximum extent possible the outdoor recreation opportunities available to the region." Walking my dogs at Fort Funston and other GGNRA areas is definitely my outdoor recreation opportunity.

In particular I object to two of the points in the DEIS:

1) There is no justification for the so-called "preferred alternative". Over thirty-years ago the Pet Policy PLUS was written particularly with Fort Funston in mind, if! recall correctly. That policy should be formalized and adhered to.

2) The poison pill Compliance Based Management Strategy must be stricken. It punishes the vast majority of dog owners for the sins of the few without any review, public comment nor proof of damage to the area.

Many parts of the GGNRA were given into the Park Service's custody with the full understanding that those areas continue to be open for off-leash recreation. I appeal to you to uphold your promises of the past and let dog owners and their dogs continue to use the very small percentage of GGNRA

land that we have traditionally used over the last two centuries.

Sincerely, Dirk Burns

Correspondence ID: 4600 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to express my displeasure with the GGNRA's DEIS on dog usage. I am a San Francisco resident who frequents many areas within the GGNRA, and as a result, am keenly aware of how the draft fails to accurately assess the impact of dogs on the areas covered with in the draft report.

Rather than an exhaustive list, I want to point to one factor that the report identified as an important 'natural' resource to protect ' soundscapes. The report found the topic to be important enough that it warranted its own subsection on Visitor Use section of the document (page 281). Barking is specifically called out as something that disrupts the soundscape, yet the areas addressed in the DEIS with dog usage all fit the following criteria:

? They are frequented by visitors ? They currently are subject to some sort of use with dogs

In any of the areas that fit that criteria, a change to the dog regulations fails spectacularly to address the primary degradation in the natural soundscapes.

Fort Funston faces a reduced off leash area to a ROLA next to the parking lot and the beach. However, the areas eliminated along the paved trails get the constant noise of both the traffic on Skyline Boulevard and the constant return of gunfire from two gun ranges immediately outside of the GGNRA.

Crissy Field in San Francisco abuts a heavily trafficked park road. It also gets the constant traffic noise from Doyle Drive (or the construction thereof), and it gets the shipping noises and fog horns from the bay. The changes hardly serve any improvement with these areas.

Ocean Beach runs along the great highway with its constant vehicle traffic which is only abated by special events such as the Bay to Breakers. This event is hardly known for its natural soundscapes.

Fort Baker is now home not only to traffic on the roads, but also Cavallo

Point resort. This activity is hardly one that creates a 'natural' soundscape.

These are but a few examples of how the DEIS fails to recognize the GGNRA's unique urban environs. As a result the analysis fails to accurately address impacts to the areas affected. The report should be redone with an analysis that focuses on the actual causes for environmental degradation (in this case sound), rather than making sweeping and inaccurate assumptions that is somehow due to dogs and barking.

The conclusion that I have to arrive at is that the Park Service is attempting to somehow impose a vision of 'natural' protection within the entirety of the GGNRA. While this vision may be consistent with remote locations with little development, the GGNRA in general, and the areas specifically addressed within the DEIS are heavily urbanized in most cases and an integral part of the surrounding towns and cities. A DEIS such as this report that fails to properly account for the true factors impacting the environment clearly cannot be relied upon to make substantive changes to policy. Thank you,

John Jankowski

Correspondence ID: 4601 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

Enclosed please find my comments on the proposed Dog Management Plan/Environmental Impact Statement.

For your information, I am a 10 year resident of Montara, California. Montara is the community most closely impacted by GGNRA decisions with respect to the northern end of Rancho Corral de Tierra ' a part of the lands about to be transferred to the GGNRA. I am a dog owner, a member of the Montara Dog Walkers, a professional dog trainer, and a retired attorney. My comments are my own .

General Comments: 1) The GGNRA's Dog Management Plan/EIS fails to offer any actual justification for the proposed changes to current dog walking usages. The document is full of statements concerning possibilities: "could affect"; "might impact". Possibilities are not certainties, nor are they even probabilities. Nowhere in the EIS is site-specific data showing certainty of impact offered for any site where additional restrictions are intended.

2) In stating that "additional ROLAs will not be considered", the GGNRA violates the court ordered procedures in US v. Barton. The GGNRA again seeks to ban historical recreational uses without public input. "Regulated Off-Leash Areas" should be considered like any other recreational pursuit, and decisions based on the merits of a given area based upon objective criteria - including historical uses.

3) The GGNRA bases its proposed decisions on National Park Service regulations to a large extent. The GGNRA is NOT a "wilderness park". It is an urban recreation area. As such it has not only specific authorization to allow dogwalking, but a mandate to do so. Congress specifically included dogwalking in the recreational uses authorized in the GGNRA. NPS regulations may not override clear Congressional intent.

4) The statements offered in support of the GGNRA's stance do not necessarily reflect the full findings of the studies and surveys cited in the body of the report. They should not, therefore, be taken as scientific evidence or even as statements of fact.

For example, statements under "Water Quality" (pg. 64 of the DMP/EIS) state that dogs may bring rabies and parvovirus into the area. This is clearly true. However - removing the dogs does not reduce the risk! Rabies is more common in mammalian wildlife - including bats, coyotes, foxes, and raccoons than in domestic dogs, who are generally vaccinated. Parvovirus is endemic. It can be transported into an area on the soles of shoes or on bicycle tires. (Consider the experience of the original wolf pack on Ile Royale.) Thus, the statement is misleading with respect to the impact of dogs on wildlife disease and water quality. Similarly, giardia is already endemic in GGNRA waters. Under "Visitor Safety and Experience", the incidence of dogbites is discussed. Special attention is given to findings that children and the elderly are the primary victims. No mention is made of the study's finding that most dogbites occur in the home or its immediate surroundings and in the context of confinement or entrapment in small spaces' circumstances far from the currently designated ROLAs. 5) The survey questions cited on page 69 of the DMP/EIS raise issues of survey design and fairness. It does not appear that the questions sought to differentiate between use areas - i.e. persons were not asked if they approved of off-leash dog-walking at Crissy Field or Fort Funston. Rather, they were asked hypothetical questions which may well have been, as a result, misleading. (Would responses have been different, e.g., if respondents in Marin were asked if they objected to off-leash dog-walking at Fort Funston in San Francisco?)

6) None of the "data" offered in support of the GGNRA's position is specifically relevant to the "New Lands", as defined in the DMP/EIS.

7) The "New Lands" definition itself is designed to obfuscate the issues by amalgamating areas which have neither environment, ecology, history, or recreational uses in common - i.e. portions of Marin and coastal San Mateo County.

8) The proposed additional restrictions on dog-walking have a foreseeable negative environmental impact. The current areas spread dog walking out over a reasonably large area for the current dog population. Crowding the dogs and their people into an inadequate area will definitely create environmental issues, health issues and increased instances of conflict between dogs and between dogs and people. Thus the GGNRA proposes to create a certain adverse environmental impact in order to prevent possible minor adverse impacts in the future. If anything, the DMP/EIS is itself a violation of the GGNRA's mission.

Comments Specific to Rancho Corral de Tierra (hereinafter "Rancho")in San Mateo County:

9) Two specific areas of the Rancho tract have historically been used as off-leash dogwalking areas. Area One is a tract bounded on the north by the Rancho stables and cultivated fields, on the west by the wetlands mandated as a part of the Devil's Slide Tunnel Project, and on the south and east by the unincorporated community of Montara. Area Two is the area accessed through Princeton-by-the-Sea a development within El Granada) and extending south and north behind that community. Maps of these areas have been submitted by other persons making comments. These areas represent less than 5% of the Rancho lands. 10) The GGNRA "preferred alternative" is to ban dogs from Areas One and Two, along with the remaining areas of Rancho. This decision was reached without any input whatsoever from local dogwalkers. This decision was also reached without any supporting data as to current uses or environmental evaluations whatsoever. This is an abuse of GGNRA's rule-making powers.

11) The lack of consultation with local dogwalkers contrasts starkly with the deference accorded horseback riders using the same areas. Horseback riders were consulted early in the transfer process, and their comments acted upon before any decisions were made as to the stable areas and riding trails. The contrast strongly suggests a decision to avoid consultation with area dogwalkers. This is an intentional violation of the law as interpreted by US v. Barton.

12) The proposed ban ignores the GGNRA's stated intent of balancing uses on a county-by-county basis. Off-leash walking in areas historically used for that purpose is to be permitted in San Francisco and Marin counties, but not in San Mateo County.

13) Areas One and Two of Rancho constitute ideal locations for ROLAs under any objective criteria. The area is not pristine wilderness. Environmental impacts are minimal - the dogs have been in these areas for the past forty years. The ecosystem has adapted. The area is open so that dogwalkers may see and avoid any situations with the potential for conflict. The use is historical. The majority of users are dogwalkers.

14) The GGNRA plan does not explore alternatives that meet the needs of all recreational users. There are other areas within the Rancho where dogwalking is not a traditional use that are easily accessed. Specifically, the tract can be easily accessed from the southern end of Etheldore in Moss Beach and/or Park Street in Montara. These access points are also much less disruptive to the local community than the GGNRA's current proposal to place a large parking lot in the middle of a crowded residential neighborhood, and next door to an elementary school.

Thus, the needs of visitors who prefer not to encounter dogs can easily be met.

Correspondence ID: 4602 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to provide my comment on the GGNRA's draft plan for dog management. I am a San Francisco resident who has been using multiple areas within the GGNRA for more than a decade. I have enjoyed the GGNRA's areas including Chrissy Field, Ocean Beach, Ft. Baker, Rodeo Beach, Stinson Beach, Ft. Funston, and other areas. During this usage, I have never observed nor experienced negative issues with dogs on-leash or off-leash. This includes more years using the GGNRA as a non-dog owner than time spent as a dog owner.

The GGNRA's plan fails to correctly assess impacts to the community for the reduction or elimination of off leash space. Two examples include the following:

Ft. Funston: The DEIS gives examples of frequent use by dog walkers with up to "10 or 12 dogs off leash." I frequent Ft. Funston regularly on the weekends when the overwhelming usage is by owners with their dog or dogs (I have yet to see any owner with more than three dogs or a dog walker with more than six dogs visiting the area). In fact the usage I observe on my visits is more people visiting Ft. Funston with their dogs than all other uses of the area combined. Furthermore, the plan's documented alternative area

for off leash recreation is Lake Merced. Lake Merced does not have any off leash designated areas ' a clear error in the DEIS. There is no other alternative close to Ft. Funston for off leash recreation.

Crissy Field: The closest alternative for off leash use to Crissy field is Mountain Lake Park. This area is in fact off leash but the off leash area is much smaller than the reduction of off leash space on the airfield at Crissy Field, let alone the full area removed from off leash use at Crissy Field. It is not a viable alternative to use with no parking, small area and lack of grass to Crissy Field.

The elimination of off leash areas in these locations will result in significant crowding in the remaining off leash areas at both Ft. Funston and Crissy Field. This crowding can only serve to create conditions for negative dog on dog and dog on person interactions ' which is exactly what the actions taken in the DEIS purport to try and solve. On top of creating crowding issues within the reduced areas within the GGNRA, the situation will create a situation where owners will take their dogs to alternative locations within San Francisco. As someone who uses multiple dog parks within San Francisco in addition to the GGNRA lands, I can assure you that these alternative areas are already at capacity. The actions to reduce the areas available within the GGNRA will have a dramatic and immediate negative impact within those areas. This impact will likely be extreme in areas such as Pine Lake Park (which is already seeing signs of use beyond capacity), Lafayette Park (which frequently has dogs outside of the designated off leash areas due to the number of dogs present at any given time), Alta Plaza (also frequently has dogs outside of the designated areas due to the number of dogs present), and the Esprit Park (again, enough dogs regularly to be at or beyond capacity).

Consequently the plan needs significant revisions to accurately take into account the impact that the changes will have on the surrounding areas of San Francisco, Marin and San Mateo. I am sure that the Park Service typically does not do this sort of analysis, but the GGNRA by its very nature is an urban recreation area that integrally mixes with the surrounding cities. As such the DEIS needs to be unique for the service in actually taking into account the impacts outside its borders. Anything short of that level of analysis will do a major disservice to the vast majority of the users of the GGNRA and the residents in the areas immediately abutting the GGNRA.

Sincerely, John Jankowski San Francisco CA 94105

Correspondence ID: 4603 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Letter

Type:

Correspondence: As a long-time resident in the Bay Area who has had four dogs over a period of more than thirty years, I am alarmed at the unreasonable restrictions that are being considered for off-leash areas in the Golden Gate National Recreation Area.

I think the word Recreation in the title of the GGNRA says it all. This is not a national wildlife refuge, it is not a wilderness area, it is not a conservation project. It is an urban open space that has been preserved for the enjoyment, recreation, and general well-being of the people who live and work in the Bay Area, and by implication, for their dogs, who need to be able to exercise and run free at least some places where they are not in danger of being run over by cars, trucks or buses.

Over the years, my dogs and I, and my immediate family, have enjoyed outings to Ft. Funston literally thousands of times, as well as excursions to Crissy Field and Ocean Beach. In addition, many of the dogs who are taken to these places by dog-walkers belong to owners who are unable to take them themselves, including the elderly, the disabled, and those whose schedules do not allow the time. The impact on these owners would be enormous should the restrictions that are proposed in the "Preferred Alternative" be adopted.

As for the environmental impact of off-leash dogs in these areas, I have seen almost no evidence of any destructive effect; I have, on the other hand, seen considerable evidence of destructive behavior by people without dogs, such as sliding down the dunes in restricted areas where no one is supposed to go.

I would urge you to opt for a policy that is considerably less restrictive on dogs in general and on off-leash dogwalking in particular than the Preferred Alternative, which is so harsh as to amount to cruel and inhumane. The vast majority of San Franciscans, I am convinced, would not wish to see dogs banned from the few open areas where they have for so long been allowed to enjoy their lives in off-leash running and play, nor to subject their owners to the hardship of seeing these precious privileges taken away.

Sincerely, Peter A. Betcher

Correspondence ID: 4604 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not

based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Exclude speculative, exaggerated, biased, or misleading statements and studies.

Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

Enable professional dog walking and align any professional dog walking rules with county or city regulations.

Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public input.

These are my personal comments and observations regarding this plan:
(here's where you fill in your own personal story and what you've seen when you've been out at the GGNRA)

Sincerely, Kim Lyss Colusa, CA 95932

ID:**Received:** May,27,2011 00:00:00**Correspondence** Letter**Type:****Correspondence:** Dear Superintendent Dean, I believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA. The GGNRA is intended for the entire community. Only 1 % of the GGNRA is open to off-leash dog walking, that is a minimal amount for something that is so important to so many people.

I have never seen any problems with wildlife and dogs in all my years of walking in the parks. While I am sure some problems do occur is the impact any more severe than cyclists, children, festival goers, Fleet Week Crowds, hikers, children and horses?

I believe the decision to ban off-leash dogs is not based on sound science and is patently unfair to a significant part of the community. Singling out dogs when there are so many other users that have just as much or more impact is discriminatory. Dogs don't leave trash, humans do.

There is an impact from all users in recreation areas. That is the nature of the beast. I don't believe well-behaved dogs have any more impact than the thousands of people who annually visit the GGNRA. Sensitive areas are already restricted from dogs. It is not necessary to remove the small area that is left to Off-leash dog walkers.

I strongly support Alternative A, the No Action Alternative, in the GGNRA and the "New Lands" area (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point, Milagra Ridge and Rancho Corral de Tierra in San Mateo County).

Sincerely, Susan Wilder

Correspondence 4606 **Project:** 11759 **Document:** 38106**ID:****Received:** May,17,2011 00:00:00**Correspondence** Letter**Type:****Correspondence:** Dear Superintendent Dean,

GGNRA/DEIS has made no good faith effort to analyze Alternative A, No Action. GGNRA pretends that Alternative A means that no management actions can be taken, specifically no management actions to mitigate adverse impacts identified in Alternative A. The logic seems to be: Adverse impacts have been identified in Alternative A; therefore, we must go to a different

alternative. In fact, many adverse impacts of dog walking that are described under Alternative A can be mitigated by management actions that do not substantially reduce the area available for off leash dog walking. I will list only a few examples.

Mitigate Adverse Impacts in Alternative A without banning off leash dogs.

1. Western Snowy Plover at Crissy Field.

Western Snowy Plover Monitoring at the Crissy Field Wildlife Protection Area of the Presidio of San Francisco and the Relative Impact of Human Disturbance 2006/2007. Golden Gate Audubon, San Francisco, California (Zlatunich, M. 2007) shows off leash dog disturbances of snowy plovers at Crissy Field dropped from 2.35 per survey hour to 0.62 per survey hour after minimal "outreach and education." Signs were posted at the WPA and a brochure was passed out on-site for one week, November 3 ' 11, 2006. That minimal effort produced a dramatic decline in disturbances of the plovers by off leash dogs. Ongoing outreach and education at the Crissy Field WPA (as well as on Ocean Beach) could alleviate a great deal of the claimed adverse impact by off leash dogs on WSP. The DEIS makes no attempt to evaluate the effectiveness of such mitigation when considering Alternative A.

The drastic restrictions on off leash recreation proposed for Ocean Beach would also be unnecessary if reasonable management were implemented there.

2. Bank Swallows at Fort Funston

Signage on the bluffs above and on the beach below the bank swallow colony is effective mitigation against potential adverse impacts from off leash dogs and people. Protection from cliff collapse, which means keeping people and dogs off the cliffs, is the one effort the swallows need from people.

When I began monitoring the breeding colony in 2001, I posted my own signs on the beach below the colony, informing people of the presence of the breeding birds and asking them to stay off the cliff. The GGNRA ranger who discovered my signs was angry, and immediately removed them. But GGNRA had done nothing to keep people off the cliff below the colony. After taking my signs down, the ranger posted official GGNRA signs. Both my signs and the GGNRA signs were effective in keeping people from climbing the cliff below the colony.

In 2005 I photographed visitors (without dogs) perched on the cliff edge directly above active bank swallow burrows. These visitors had no way of

knowing the swallows were there; they had passed no signs on their walk into the area. In response to my photos GGNRA installed signs on the dunes above the colony, informing people of the presence of the breeding colony and asking them to stay away from the cliff edge. I didn't see any people on the cliff edge for the rest of my monitoring of the colony that year. If GGNRA had posted signs on their own initiative, at the beginning of the bank swallow breeding season, that potential adverse impact could have been avoided.

I visited Fort Funston Saturday, May 14, 2011. The bank swallows were there, busily digging burrows and commuting to Lake Merced and back. But there was no indication from GGNRA that the swallows were there no signs asking people to stay off the cliff edges or away from the cliffs beneath active burrows. If GGNRA really thinks people and/or their dogs have an adverse impact on the nesting swallows, they could make some effort to mitigate that impact by informing visitors of the nesting colony. But, as in previous years, GGNRA made no such effort.

Signage doesn't generally produce 100% compliance, but in the case of the bank swallow colony it has been effective for years. The observation of a very few dogs in the bank swallow protection area is not evidence that such measures don't work.

3. Post-and-cable fencing is also effective in keeping people and dogs out of sensitive areas, without banning them from the general area. The authors of USGS 2004 published the results of their wildlife monitoring at Fort Funston in a refereed scientific journal in 2009. ("Wildlife Response to Coastal Dune Habitat Restoration in San Francisco, California" by Russell, Shulzitski and Setty, Ecological Restoration, Vol. 27, No. 4, 2009). They weren't specifically studying dogs, but they noted the presence of dogs and made the following observation: "Although a small number of visitors and their pets continued to use the restricted areas, the measures [post-and-cable fences] were successful for the most part." That is, post-and-cable fencing is effective even in such a heavily used area as Fort Funston. It is an effective way of managing sites throughout the GGNRA, while retaining off leash recreation.

GGNRA staff often claim post-and-cable fencing is not effective because they can document people and/or dogs inside fenced areas. Again, 100% compliance is not a reasonable criterion for "effective." It's the mitigation of the adverse impact that is important. The 12-acre restricted and restored area at Fort Funston is thriving behind post-and-cable fencing, in proximity to large numbers of off leash dogs.

4. Post-and-cable fencing would be even more effective if augmented by

accurate and credible signage.

The signage at Fort Funston has never been accurate or credible: a) Areas are signed as "bank swallow habitat" that swallows don't use, b) Areas are signed as "wildlife study area" for years after the study has been completed, c) Areas are signed as "habitat restoration area" for years, without any restoration occurring, d) Signs said "dogs must be on leash" during Negotiated Rulemaking, when everyone knew off leash was legal, e) etc. Regular visitors to Fort Funston could easily see that the content of GGNRA signs was not true.

Incorrect signage produces cynicism in park visitors, and leads to non-compliance. Accurate signage is a management tool GGNRA could use at many sites, mitigating potential adverse impacts.

5. San Francisco *Lessingia* at Fort Funston

DEIS claims Alternative A presents "long-term moderate adverse impacts" to San Francisco *Lessingia* at Fort Funston. (p 1302-1303) This is bizarre since there is no *Lessingia* at Fort Funston, and it's not clear there ever was. The USFWS Recovery Plan for Coastal Plants of the San Francisco Peninsula discusses *Lessingia* but doesn't show *Lessingia* historically at Fort Funston, although some was found near Lake Merced (USFWS 2003, p25-27, and Figure 1, p 50. DEIS bases the claim of adverse impact on the potential to introduce *Lessingia* at Fort Funston, saying "unrestricted dog use at the site would preclude the reintroduction(sic) of this species by NPS" (p1302) DEIS also states "dogs could also access restoration areas, despite fencing in place," citing USGS 2004. Dogs could access the area despite fencing, but USGS 2004 credits the fencing with "discouraging the majority of visitors and dogs," although it "did not ... eliminate all foot traffic or use by dogs." The authors of USGS 2004 said in their published version of the same study that although "a small number of visitors and their pets continued to use the restricted areas, the measures were successful for the most part." Off leash dogs do not prevent the introduction of *Lessingia* to the 12-acre habitat restoration area at Fort Funston. As shown in #3 above, post-and-cable fencing is effective mitigation of any adverse impact; the fencing already reduces foot traffic below a level harmful to *Lessingia*. The native plant restoration in the 12-acre habitat restoration area is thriving. Foot traffic in the restricted area could be further reduced by clear rules, accurate signage and enforcement. The DEIS assumption that complete absence of foot traffic (100% compliance) is a prerequisite for *Lessingia* is not supported by science. The USFWS 2003 describes *Lessingia* as appropriate to "disturbed dune deposits" and notes "...plant size and fecundity appear to increase markedly at edges of vegetation gaps, such as footpath margins, where potential competition is reduced." (USFWS 2003, p

38)

[There is real irony here. DEIS/GGNRA claims off leash dogs will have adverse impacts on Lessingia at Fort Funston, where there is no Lessingia and no record that Lessingia was ever there. But the same off leash dogs, if displaced to Lake Merced, will have no adverse impacts on Lessingia (DEIS p 1304) even though Lessingia definitely grew at Lake Merced historically, and specifically grew in the off leash area at Lake Merced ("The Mesa"). (USFWS 2003, p25-27, and Figure 1, p 5)]

I have offered a few instances where reasonable management of GGNRA sites would mitigate adverse impacts claimed for Alternative A in the DEIS. I'm sure other people will present additional examples. But it's the responsibility of GGNRA/DEIS to identify and analyze mitigation actions for the adverse impacts they claim. Otherwise they have not truly analyzed Alternative A.

If GGNRA would add to Alternative A reasonable off leash areas in the GGNRA sites in San Mateo County, while mitigating problems they find with Alternative A, they would have a truly preferred alternative.

Sincerely,

Keith McAllister Oakland, CA 94611

Cc: Senator Dianne Feinstein Representative Nancy Pelosi Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Fort Funston Dog Walkers (FFDW) San Francisco Dog Owners Group (SFDOG)

Correspondence ID: 4607 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan.

If you are going to start taking away dog/dog owner's rights because of irrational fears about dogs and dog bites. Please consider irrational fears about men. I feel that most people fear attacks by men much more than they fear attacks by dogs. Attacks by men would include murder, rape, mugging, assault with or without a weapon. In my time spent in the GGNRA, my fear of men, and the crimes they commit is much greater than my fear of dogs, or my fear of attacks by dogs.

Concerning your statements about the disposal of dog waste: Why is your focus only on dog waste? Shouldn't you be concerned with men spitting? In the time i have spent in the GGNRA I have been much more concerned with stepping in large spit wads deposited in the walking paths by men. I have not much been concerned with dog waste as I haven't seen it that frequently and especially not on the walking paths. I frequently see men spitting on the paths. Yet I do not see any signs in the GGNRA lands prohibiting spitting in the pathways or on the land. I am concerned with the transmission of human disease here.

Environmental concerns in the GGNRA: On many occasions i have seen men off trail and climbing up the fragile vegetation on the steep hillside ascending from Mile Rock Beach to the Land's End Trail. These men are doing constant damage to the fragile vegetation in this area by engaging in this behavior.

Dangerous behavior in GGNRA: Many times on Ocean Beach I have nearly been run over by some sort of wheeled vehicle being pulled by a kite. This vehicle has always contained a man, and only a man.

Also, I have been walking in Sutro Park many times where broken glass is all over the pavement area because empty alcoholic beverage bottles have been hurled from the tower area overlooking the ocean to the pavement area below. This broken glass is dangerous. I have witnessed men, and only men throwing these bottles down to the pavement on more than one occasion, and I have almost been hit by these flying bottles.

For these reasons I am respectfully requesting that you address all of your concerns in your summary and put forth a plan calling for men to be disallowed in the GGNRA.

Sirs, if the concept of terminating your rights to enjoy the GGNRA because of the criminal or irresponsible behavior of a few men is disturbing to you, then I think you should consider how frustrating and disturbing your plans to diminish the rights of families with dog(s), based on the behavior of a few, is to those persons. Deborah Riat San Francisco, CA 94121

Correspondence ID: 4608 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Deon,

am writing to protest the proposed restrictions on dogs and humans in the GGNRA. The Bay Area is a model for enlightened co-use of our natural

resources. The availability of nearby areas for the tax paying dog owners to exercise their animals and maintain a healthy lifestyle is necessary for a balanced society. Dogs have been living with humans as helpers and companions for countless generations. To deprive this natural pairing of the opportunity to enjoy nature together would be a mistake with unforeseen consequences.

Sincerely,

Lauren M. Dyer

Correspondence ID: 4609 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Deon,

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA. The Bay Area is a model for enlightened co-use of our natural resources. The availability of nearby areas for the tax paying dog owners to exercise their animals and maintain a healthy lifestyle is necessary for a balanced society. Dogs have been living with humans as helpers and companions for countless generations. To deprive this natural pairing of the opportunity to enjoy nature together would be a mistake with unforeseen consequences.

Sincerely,

Valerie Stillman

Correspondence ID: 4610 **Project:** 11759 **Document:** 38106
Received: May,10,2011 00:00:00
Correspondence Type: Letter
Correspondence: Mr. Dean,

I have lived on Stinson Beach for 25 years. The NPS part of the beach is nice and clean. The shore birds are relaxed and able to feed. You can take a nap on the beach or go fishing without being disturbed. No dogs are allowed there.

The county beach (where I live) is filthy. You must watch your step so as not to step in dog poop. I will not walk barefoot at night and you must use a flashlight to avoid dog poop. Visitors are more likely to use the dog poop

pick up bags that are now provided, but many bags full of poop are now left on the beach (and my door step). Usually it is the locals (my neighbors) who bring their dogs to the beach to 'do their business' and refuse to pick up the poop. It seems they feel it is 'natural' for their dogs to poop on the beach and I have heard things like 'oh the ocean washes it away...' and 'whar do you expect on a beach?'

I heard that some kids for e.coli (or something) from playing in the sand

Also, when the dogs are not pooping or running over your towel, they are chasig the shore birds.

I have seen a dog maul my neighbors cat to death. I have seen kids get bit by dogs. I see dog fights all the time. I pick up dog poop EVERYDAY.

A little girl got her face severly biten by a dog while she was playing on the beach.

IF the rules were enforces, perhaps things would be better, but peopoe ignore common courtesy when it come to their dogs doing as they please.

There is nothing quite as nice as a park that is dog free.

A trip to any dog park is visual proof how detrimental dogs are to the environment.

I ask you to keep dogs out of the parks and enforce existing laws where they are allowed.

Why arent dog owners satisfied with existing dog parks and why dont they work to improve the grounds at dog parks? Because dog parks as so trashed that is is not a nice place to bring your dog. Please dont let our parks get trashed any further by allowing dogs into the beautiful GGNRA.

Thank you, Sincerely,

Dino Colombo

Correspondence ID: 4611 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Chris Cara, I'm in my sixties. I am 5 generation San Franciscan

from North Beach. I bring my 11 year old dalmation, Cariotta, to Chinzey Field once a week. My dog brings a great life to me and my friends. Seeing her run puts not only a smile on my face but also others. I've taken serious responsibility having dogs all my life. I've worked hard with my dog to have her follow my commands and never do I leave home without the proper bag to clean up after her. I watch to see if she goes into areas where the environment is protected by signs or fences.

Maybe the GGNRA could add more areas for the off-leash dogs if better environmental signage barriers so we all can enjoy what was created for recreation.

Respectfully, Christopher Cara

Correspondence ID: 4612 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Gregory Cuti, age 40. I have lived in the Bay Area for nearly 18 years now. I currently own a home in Redwood City, where I live with my wife and 6 year old dog. One of our favorite weekend activities is to go hiking and running on the dunes at Fort Funston. When we first discovered Fort Funston, we were thrilled to be able to share such a beautiful park with our dog. With so many visitors, it has always amazed me how respectful everyone is to one another. I believe this park is the model for how shared open space can be enjoyed by different types of visitors (hikers, bikers, runners, hang gliders, dogs, etc).

I have trouble with the GGNRA's preferred alternative plan in that it severely limits and affects the off leash dog walking area at Fort Funston. From the maps I have seen, the preferred alternative. off leash area is bound by the large and always busy parking lot, steep cliffs and one paved walkway and one sanded path. I am concerned that if the number of dogs allowed playing off leash in that area dramatically increases, the cliffs and the parking lot become major safety concerns. Additionally, limiting off-leash access to the beach and large sand dunes greatly diminishes the "fun factor" for me, my wife, and my dog. It is my opinion that the DEIS has failed to truly analyze the impact of restricting the off-leash area at Fort Funston.

I feel that the "preferred alternative" actually makes the park less fun and less safe. I trust that the GGNRA, in developing a general management plan, will take into consideration and respect the speCific character and situation

of the Fort Funston Area. I fully support Alternative A, the No Action alternative of the DE IS, as it relates to Fort Funston.

Respectfully, Gregory Cuti

Correspondence ID: 4613 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Deon,

I am writing to protest the proposed restrictions on dogs and humans in the GGNRA. The Bay Area is a model for enlightened co-use of our natural resources. The availability of nearby areas for the tax paying dog owners to exercise their animals and maintain a healthy lifestyle is necessary for a balanced society. Dogs have been living with humans as helpers and companions for countless generations. To deprive this natural pairing of the opportunity to enjoy nature together would be a mistake with unforeseen consequences.

Sincerely, Michael Myers

Dear Mr. Dean

Please consult canine professionals- they will tell you that dog parks, which these rules essentially will force upon dog owners, are terrible places to socialize most dogs. Furthermore, most dog owners I know are extremely responsible. As a society, we should agree to be harder on those breaking rules as opposed to punishing all who have dogs as companions. I value the off-leash areas more than anything else about the Bay Area. And I would like to point out that most areas are no dogs allowed or on-leash.

Thanks for your time!

-Michael Myers

Correspondence ID: 4614 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

I am an almost everyday user of Fort Funston and I will direct my comments to that particular site. I have reviewed the DEIS as it pertains to Fort

Funston. The "preferred alternative" described in the DEIS will greatly negatively impact my use of Fort Funston which will affect both my physical and mental health. Much of the information upon which the "preferred alternative" is based appears to be inaccurate and/or incomplete information.

1. Safety - The DEIS does not contain any user site survey of Fort Funston. Per statements of NPS public spokesman Howard Levitt, no user site survey of Fort Funston has been conducted by, or on behalf of the NPS. Throughout the DEIS reference is made to safety issues related to dog bites. The only actual data in the DEIS pertaining to dog bites is the Law Enforcement Data (Appendix G) which reflects for Fort Funston "4 bite/attack" which is useless information without a site survey of users to determine if the reported incidents are statistically relevant. Nor does the data include a description of the severity of any incident (i.e., skin broken, medical attention required, etc.) I also note the category "10 haz cond/pet rescue" is noted to include "cases of simple assault, case of injured person, case threats" which appear to include actions of persons, not dogs. Again, without a site survey of use, these numbers are meaningless. In short, there is no statistical data as to the daily number of visitors, the daily number of dogs, and what the Fort Funston visitors are or are not doing (i.e., walking dogs, walking, hang gliding, flying radio controlled airplanes, practicing cliff rescue, watching the ocean, etc.)

As you know, the topography of Fort Funston is remote and hilly which does not provide very clear sight lines of users. In addition the cliff area is almost vertical and eroding. In my almost daily visits to Fort Funston, I have rarely seen any NPS law enforcement patrol. Because of the lack of observable active patrol/monitoring of the area by the NPS, the only reason I feel safe walking in Fort Funston is because I am accompanied by my dog under voice control. This includes the area of the parking lot as I exit and enter my car. Fort Funston is contiguous to the urban area of San Francisco/Daly City and within walking distance to Lake Merced which contains numerous homeless encampments. Based on the lack of any significant NPS patrol presence in Fort Funston, coupled with its natural terrain and proximity to San Francisco and Daly City, if I am denied the deterrent effect/protection afforded by the company of my dog, I fear for my personal safety which would preclude my ability to use Fort Funston.

Under the current status (Alternative A), I do not fear for my personal safety and am able to utilize the recreational aspects of Fort Funston for my physical and mental health due to the personal protection afforded to me by my dog under voice control. The DEIS does not address the issue of personal safety which will occur under the "preferred alternative", nor does it address any mitigation of the increased personal safety issue on the part of

NPS to institute constant and effective safety patrols within Fort Funston.

The DEIS does not include any discussion of the inherent danger of the beach at Fort Funston due to the extreme undertow and riptide conditions present throughout the year. All native San Franciscans understand the very significant danger presented at this stretch of coastline. Any use of the beach should, for public safety, be restricted from swimming

The DEIS does not include any discussion of the safety concerns of having children at Fort Funston due to the irregular/remote/hilly topography, the very dangerous cliff area (constantly eroding from wind and rain and often not visible due to fog) and the dangerous beach.

The "preferred alternative" will create a dangerous situation for humans and dogs by limiting off leash to the area immediately adjacent to the north side of the parking lot. This area is far too small to accommodate the large number of daily walkers and dogs which will result in injury. There is no information in the DEIS as to how this specific amount of Fort Funston was allocated for off leash in the "preferred alternative". No data in the DEIS supports this allocation of limited space to off leash activities (beach off leash discussed below). Without supporting statistical and verifiable data, the basis of this allocation appears to be arbitrary.

2. Soundscape - The DEIS does not include relevant information related to the soundscape at Fort Funston and cites dog barking as an issue. As an almost daily user of Fort Funston, it is my experience is that there is little dog barking, and what dog barking does occur primarily occurs inside vehicles in the parking lot. Changing the current off leash to the "preferred alternative" will not decrease dog barking. In fact, the change to the "preferred alternative" will result in the increase of dog barking in other parts of Fort Funston as the "preferred alternative" off leash areas are too small to accommodate the amount of users (for which NPS has not conducted any accurate statistical site survey of users), and dogs restrained on leashes in other parts of the Fort are much more apt to bark than when they are off leash.

No reference is made in the DEIS to the constant noise from the very heavy use of Hwy 1-Skyline Blvd by cars, trucks and buses. This can be heard in all parts of Fort Funston with the exception of the beach.

No reference is made in the DEIS to the gunshot noise of the Pacific Rod & Gun Club range adjacent to Fort Funston which can be heard through all areas of the Fort, excluding the beach area.

No reference is made to the noise from the SF Police Gun Range adjacent to the Fort Funston, that seemingly is operated 24/7 and can be heard through

all parts of the Fort, excluding the beach.

No reference is made in the DEIS to the noise made by the hang gliders.

No reference is made in the DEIS to the noise made by model airplanes.

No reference is made in the DEIS to the noise generated by the significant number of SFO passenger jet takeoffs over Fort Funston and / or parallel to the beach and in climb out prior to turning eastbound (depending on SFO flight rules then being utilized.)

3. Bank Swallows/Native Species/Habitat Protection - The DEIS claims that off leash dogs are interfering with the nest of the Bank Swallows which are located on the cliffs at the beach. While every once in a while an errant dog falls over the cliffs by accident, this is unusual experience and not done to interfere with a bird. People climb the cliffs and also fall over them but the DEIS does not include any analysis of the effect of the human interference with Bank Swallows or other native inhabitants. In addition, no statistical data is provided pertaining to the large number of cliff rescues by the Police, Sheriff, Fire Department, Coast Guard. There must be data available because the various departments are frequently present on site practicing and / or rescuing.

The DEIS fails to address the effect of the large invasion of the non-native crows/ravens at Fort Funston on the native species of birds and animals. There is not a seagull to be found at Fort Funston. The crows/ravens have invaded the cliff areas, have driven off other birds and appear to eat everything and anything. They show no fear of dogs or humans. The DEIS fails to address the destructive effect these birds are having on the native birds and animals of Fort Funston. The DEIS fails to discuss the clear lack of understandable notice, in both signage and fences, o habitat protection areas at Fort Funston. It just is not present.

4. Dog Feces - The users I have observed at Fort Funston have been quite proactive in collecting and disposing of dog feces. Although not mentioned in the DEIS, the NPS "poop patrol" collects the feces approximately every 1.5 - 2 hours from the various waste disposal sites. Therefore, the NPS must have records of the volume of dog feces which is collected and disposed of correctly.

The "preferred alternative" will not change the amount of dog feces or make any change in the percentage of persons who comply with the feces pick-up requirements. Whether a dog in on leash or off leash will not change the amount of dog feces. There is no statistical data contained in the DEIS that there is any real dog feces issue affecting Fort Funston.

5. Diversity/Discrimination Against Seniors and Disabled- The DEIS claims under the Environmental Justice section that Hispanic and Asian users of the GGNRA cited dogs as a problem. There is no data in the DEIS for Fort Funston. Obviously the writers of the DEIS are not users of Fort Funston as there is a very diverse population utilizing this property.

In addition to ethnic diversity, Fort Funston users demonstrate a vast array of sex, age and economic levels. Many seniors utilize Fort Funston. Many disabled persons utilize Fort Funston.

The "preferred alternative" will be detrimental to seniors and disabled persons who utilize Fort Funston. Many seniors and physically disabled persons who utilize Fort Funston do not want to walk through sand. The off leash areas described in the DEIS require the owner to walk through the sand near the parking lot in order to monitor/voice control their pet, or climb down to the beach to access an off leash area. Many senior and disabled persons are unable to make the trek to and from the beach on the sand ladder. The descent to the beach is both arduous and dangerous as the steps are large and uneven. It is easy to lose one's balance. The "preferred alternative" requires that the dog remain leashed while the descent and ascent is made. This is dangerous for both the owner and the animal as any misstep by either can result in very serious injury.

Further many senior or disabled persons want to have the dogs under voice control as it allows them not to have to exert any physical strength with the upper extremities. Many middle aged women suffer from degenerative rotator cuffs which preclude walking a dog on leash. Other disabled or seniors have balance issues. Voice control allows the dog owner to have the availability of both arms to aid in their balance and protect themselves if an accidental stumble should occur. The "preferred alternative" would deprive seniors and disabled persons from the ability to avoid physical injury. 6. Water Discharge/Erosion of Cliffs/Toxic Substances - The DEIS fails to address the pre-existing sewer lines of San Francisco and Daly City which go under Fort Funston and discharge into the ocean. The DEIS does not address the effect on the environment of the sewer lines and the huge excavation which was performed in the last year to update these sewer lines and attempt to stabilize the cliffs which had receded 75 feet in the last 30 years due to the effects of nature (not dogs).

The DEIS fails to address the toxic substances which remain at Fort Funston due to the occupation of the site by Coast Artillery in World War II and the subsequent use as an Army Nike missile site. There is no reference to the leaching of these toxic substances and their effect on the environment. While it is true that a certain amount of mitigation of hydraulic fluid from Nike missile handling equipment still remaining on the site and still underground has been done, the very personnel performing the mitigation

for the Federal government indicated they don't really know what else is underground, where all the equipment is actually located, what the current condition of that equipment is, and, last but not least, where it will leak next. The DEIS also fails to address unexploded ordinance which continues to still be discovered at Fort Funston. The DEIS also fails to address the exploded ordinance (lead) mixed into the soil throughout the site and still being discovered by even the most casual observer.

7. Soil & Geology - The DEIS does not discuss the effect on soil by use of humans at Fort Funston.

8. Vegetation - The DEIS does not address the effect of the shifting sand due to nature (wind, water) as affecting vegetation, or the extent vegetation has been loss due to excavation at Fort Funston. (What I have overheard are group leaders giving lectures to student groups stating that the major cause of the erosion is "running dogs.")

9. Wildlife - The DEIS does not have data to support conclusions/assumptions.

10. San Francisco Lessingia - The DEIS does not contain data to support conclusions. Personal observations are that fencing is completely inadequate at site and signage is non-existent.

11. Visitor Use & Experience - The DEIS does not have data to support conclusions of "preferred alternative". This "preferred alternative" will result in major adverse cumulative impacts for myself and many other users of Fort Funston. In that NPS has not performed a site survey at Fort Funston, it is amazing that the DEIS can support the "preferred alternative" when the user population has never been surveyed.

Conclusion - As a fifth generation San Franciscan, a disabled person and a constant user of Fort Funston, I object to the conclusions of the DEIS as they lack viable quantitative and scientific basis. Site specific information is lacking for Fort Funston. If the NPS proceeds with the "preferred alternative" the NPS will be depriving thousands of people recreational use of Fort Funston. In the legal world, the DEIS would commonly be referred to as "spaghetti" - throw it all on the wall and see what sticks - a great way to try and confuse (and take advantage of) unsophisticated jurors; in this instance unsophisticated users of the area. I would expect a higher level of conduct and professionalism from the NPS.

If it is the intent of the NPS that Fort Funston remain an abandoned army base, it will be accomplished under the 'preferred alternative'. In addition, the poison pill included in the DEIS which automatically allows the NPS to

allow no voice control dogs is an insult to every citizen.

May I suggest that the NPS spend its limited resources on improving the GGNRA, not destroying it's peaceful use. Otherwise, it seems as though the NPS budget requires far closer scrutiny.

Very truly yours, Joanne M. Mahoney

cc: Senator Dianne Feinstein 331 Hart Senate Office Bldg. Washington, D.C. 20510 Senator Barbara Boxer 112 Hart Senate Office Bldg. Washington, D.C. 20510 Congresswoman Nancy Pelosi 235 Cannon House Office Bldg. Washington, D.C. 20515 Congresswoman Jackie Spier 211 Cannon. House Office Bldg. Washington, D.C. 20240 Assemblywoman Fiona Ma State Capitol P.O. Box 942849 Sacramento, CA 94249 Mayor Ed Lee City Hall 1 Dr. Carlton Goodlett Place, #200 San Francisco 94102

Correspondence ID: 4615 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I am Andy Yang. I live in San Francisco. I do not own a dog. I do love dogs. I am writing to you to share my disappointment with the GGNRA proposals to severely restrict access to the GGNRA lands to people with dogs. I came to the US from China in 1987 and became a US a citizen in 1994. I am disabled from a stroke however the the Bay Area is a great place to live because of the many accommodations that public spaces make for people with disabilities. I love visiting Crissy Field and watching the dogs play. I usually sit on the benches near the parking lot at the east end of Crissy Field. Sometimes we bring a friend's dog with us and I watch as my wife plays with the dog near the water.

I have reviewed the maps you have presented and am very concerned that your proposed alternative where dogs are restricted to a very small area of Crissy Field is unfair to people who own dogs and unfair to those of us who cannot walk to those areas where you are telling the dogs to go. These areas are a significant distance from the parking lot and I would not be able to participate with my family in playing with and watching the dogs.. This would take away my enjoyment of Crissy Field. I have also noticed that when I am with a friend with a dog or we have with us a dog that a friend has let us take out people are much friendlier to me and do not notice my disability but talk to me about the dog. I makes me feel like I am part of the community. I think that people with dogs are friendlier and nicer in general.

I have noticed that people with dogs keep their dogs under voice command and away from the fenced off areas. They are also very careful to make sure that their dogs do not jump on me.

The dogs and the dogs' owners make Crissy Field better. I do not know why you want to punish the dog people by making them stay in one small area. This makes no sense and makes it very hard on those people with disabilities to participate in walks and other activities with their friends who have dogs. I hope you will reconsider your proposals and leave everything the way it is now. Thank you Respectfully,

Andy Yang CC: Representative Nancy Pelosi, 8' Congressional District of California, House Minority Leader, U.S. House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Crissy Field Dog Group

Correspondence ID: 4616 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendant Dean

My name is Michael Hill, I am a registered nurse and I work at San Francisco General Hospital. I am an alumnus of the University of San Francisco, and a member of the Alpha Sigma Nu Jesuit Scholars, as well as a member of the San Francisco Bicycle Coalition. I am also a dog owner and an enthusiastic lover of open spaces and coastal beauty. I am writing this letter because I am very concerned that the GGNRA is about to embark on a plan to limit dog recreation at Crissy Field, Ocean Beach, and Fort Funston, a misguided plan that will irreparably harm the happiness and health of all San Franciscans and their pets for years to come.

Although my dogs are now 12 and 10 years old and do not often put a paw in the bay or ocean waters these days, throughout their lives Ocean Beach, Fort Funston, and Crissy Field have been their playgrounds. Besides being able to socialize with other dogs and their owners, being able to visit these spots with my dogs has taught me an abiding love and respect for the beauty of Northern California. That is why I am also a member of the Sierra Club and other environmental groups. I do not subscribe to the

I have read over some of the lengthy draft, gone to several community meetings that discuss the proposed changes, and have talked to my supervisor, Scott Weiner, about what I can do as a citizen to see that the GGNRA modifies its proposed plans to limit off-leash access. I am sure that your office has received a large volume of responses from people like me,

citizens that have spent years, perhaps decades, hiking, romping, and swimming with our dogs at these coastal areas. We have come together as a community to protest these proposed changes that would curtail our freedoms. And we also question the assumptions that underlie the need for these changes.

It is my understanding that the GGNRA has overestimated the impact of dogs upon these environments. Therefore, I would like to see more rigorous studies that concretely and unequivocally confirm these assumptions. Also, exactly how many incidents of dog attacks have there been in these locations over the years? My friends and I have consistently frequented all of these off-leash areas, and the number of occasions when a dog has menaced a wild animal or another visitor to the beach is minimal. The vast number of people and dogs that visit these areas pick up their litter, are well-behaved, and generally leave the seaside as clean and safe as they have found it. According to the GGNRA data, dogs account for only 2% of serious safety incidents.

There are many other steps that can be taken to protect coastal areas, short of completely banning off-leash recreation. Since it is GGNRA's mandate to provide "recreation," I feel it is your responsibility to live up to your name and take the necessary steps to not only protect the environment, but also to ensure our enjoyment of these beautiful areas. Signage, low-lying fences that are well maintained, and public education are what is essential, to preserve these areas, not draconian legislation.

Your office can be certain that, should these proposed changes actually take effect, there will be a sizeable "pushback" from citizens such as myself.
Michael Hill

Correspondence ID: 4617 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: I have just reread the Sunday Profile in the April Chronicle as well as the Cindy Buchman article in Pet Pages re the ongoing discussion re dog walking in public areas.

I am in my 80's and have stopped walking to Crissy Field because I am so fearful of dogs due to a childhood dreadful encounter. Dogs have taken over the city - I can no longer walk near my street at Aquatic Park because dogs do their business where children play (or used to) in the sand. Dogs are there w/o leashes. A few steps from my door a woman was holding on to her dog while it was having a B.M.

-Dog leashes are so long a child would be mauled before the mutt can be restricted (or an adult)

-I came to S.F. in 1945. Things have changed. I want to leave. People think more of their mutts, which they treat as family, then they do of tax-paying citizens who now can only walk the street by looking down to avoid stepping in dog waste.

-Bicycles also have taken over. I was recently run into by a cyclist on a rainy day because he was on the sidewalk.

* Please, Mr. Dean, keep people with dogs away from Crissy Field, Fort Point and all places where dogs have taken over and we can no longer visit.

-Because of the Sterling Davis Law I have a dog living next door to me - a so-called comfort dog, altho the owner works all day and has had it since it was a pup. I am a prisoner in my own apartment, as a result. Bless you.

Correspondence ID: 4618 **Project:** 11759 **Document:** 38106
Received: May,28,2011 00:00:00
Correspondence Type: Letter
Correspondence: Don't Change the law for Fort Funston

Dear Super Intandent Frank Dean,

Hi I'm Hannah, and I'm 10 years old. First of all the dogs are natural so I don't get why people are saying that they're distroying Fort Funston. I walk at Fort Funston with my dog Gertrude. We always pick up her poop or number 2, and sometimes we pick up other peoples dog poop. I think sometimes people are trying to pick up their dogs poop, but they miss when their dogs or the dogs that ghey get paid to walk. One time I saw a dog going number 2, or poop, I told the dog walker that the dog he was walking went number 2. I've had many wonderful experiences at Fort Funston, my dog Gertrude likes sticks and when she gets big ones, and she can't get it up, this could go on YouTube, she whines while she digs to pick up the sticks from under. This is a great park, but it could be more patrolled if you needed to with park rangers just to keep a watch. It's such a great place, why leave all the dogs chained up with leashes?

From Hannah DeGroot, 4th grade, SF,CA

P.S. Thanks for reading I hope you didn't think my letter was a waste of time. I hope you would like to walk your dog there. I love it, and many other people do too. Hope you can read my handwriting. Thanks!

Correspondence ID: 4619 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

The GGNRA DEIS for a Dog Management Plan does not consider the impact that restrictions of off-leash access and resulting overcrowding in city parks will have on dog health and behavior. The DEIS contains no information on the benefits of off-leash play for dogs in terms of their physical and mental health and behavior. Dog behaviorists nearly universally view off-leash play as critical for well-exercised and well-socialized dogs. The severe restrictions on off-leash access proposed in the Preferred Alternative will likely decrease the amount of aerobic exercise many dogs receive, as it becomes more problematic for their owners to provide them with the level of exercise they currently get at Fort Funston, Ocean Beach and other locations in the GGNRA. The restrictions will also seriously interfere with the socialization of dogs both to other dogs and to people in general, as they lose access to places that allow them to interact freely and without crowding. The net result of this loss of off-leash space is likely to increase problem behaviors observed in many of those dogs who lose access to off-leash areas.

If the severe restrictions proposed in the Preferred Alternative go through, many people who currently walk their dogs off-leash in the GGNRA will instead move to the much smaller city parks. The nearly tenfold increase in dogs observed in Stem Grove mid-morning on Tsunami Friday (March 11, 2011, when the GGNRA closed Fort Funston and Ocean Beach because of the threat of a tsunami from the earthquake in Japan, as reported in the March 2011 issue of the West Portal Monthly) is indicative of the increases in visitor usage in city parks likely to occur if the severe restrictions in the Preferred Alternative go into effect. Off-leash areas in city parks are significantly smaller in area than those currently available in the GGNRA. Putting thousands more people and dogs into much smaller areas will inevitably lead to problems caused by overcrowding. This will result in more behavior problems in dogs forced to endure the overcrowding day in and day out.

Problem dog behaviors are one of the primary reasons given when owners surrender dogs to shelters. It is likely that the restrictions on off-leash access and overcrowding that come from the GGNRA's Preferred Alternative will therefore result in an increase in surrenders to city shelters. Because dog rescue groups are already overwhelmed with the existing demand for placements out of shelters, it is likely that they will have difficulty finding

homes for the additional shelter dogs that result from the GGNRA's plan. Thus, there will likely be an increase in dogs in the city shelter at any one time. This increase will have an economic (supplies and staff resources) impact on city shelters, and an emotional impact on shelter staff as potentially adoptable dogs are euthanized at city shelters because there are too many dogs in the shelter or because they fall through the cracks of the rescue system.

On March 10, 2011, the San Francisco Commission of Animal Control and Welfare, of which I am the Chair, held a hearing on the GGNRA DEIS and its potential impacts on dog behavior and city shelters. We heard testimony from invited speakers that included dog behaviorists and trainers, as well as leaders of established dog rescue groups and shelter directors (the SF/SPCA and SF Animal Care and Control). The testimony supported what I have said in this letter. The Commission advises the Board of Supervisors on animal issues. At the March 10 meeting, the Commission voted 5-2 to recommend that the San Francisco Board of Supervisors oppose the DEIS Preferred Alternative because it did not consider impacts on dog behavior and possible increases in surrenders to city shelters.

I have attached a transcript of the GGNRA discussion for that meeting, including the public comment that followed the invited speakers. This is provided not as an attempt to submit public comments about the DEIS on behalf of these individuals, but rather to educate GGNRA staff and comment reviewers on this issue by providing the expert testimony of dog behaviorists, trainers, heads of dog rescue groups, shelter directors, and dog owners about the benefits of off-leash play for dogs and the impacts that the loss of off-leash space in the GGNRA will likely have on dog health and behavior and on city shelters. I have also attached letters sent to the Commission of Animal Control and Welfare Commission, as well as to the Land Use Committee of the Board of Supervisors by nationally recognized local dog behaviorists about these issues. Again, these letters are not intended to be considered as a submission of the individual's public comment on the DEIS, but rather are intended to educate GGNRA staff and the comment reviewers about the benefits to dogs of off-leash play and potential impacts on dogs if off-leash access is severely restricted in the GGNRA, as provided by nationally recognized expert dog behaviorists.

The impacts on both dogs' health and behavior, and on city shelters and rescue groups were not considered in the DEIS, and the document is therefore incomplete. As a result, any analysis of alternatives that did not include these impacts cannot be accepted. The GGNRA must go back and include analysis of these impacts before any dog management plan can go forward.

Sincerely, Sally Stephens

San Francisco, CA 94116

cc: Sen. Dianne Feinstein, Sen. Barbara Boxer, Congresswoman Jackie Speier, Secretary of the Interior Ken Salazar, NPS Director Jon Jarvis, NPS Pacific West Regional Director Christine Lehnertz, State Sen. Leland Yee, Assemblymember Fiona Ma, San Francisco Mayor Ed Lee

Correspondence ID: 4620 **Project:** 11759 **Document:** 38106

Received: May,16,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

I closely monitored the bank swallow colony at Fort Funston for five successive nesting seasons, 2001-2005. This involved 90 monitoring sessions of an hour or more each. I recorded each individual burrow on maps, noted which burrows were occupied on each of the 90 days, and tried to identify how many young were fledged from each burrow. My records are at least as comprehensive and accurate as those kept by GGNRA staff. I tell you all this to communicate: The bank swallows at Fort Funston are very important to me. I would never do anything to compromise their welfare, nor would I willingly allow others to harm them. So I do not make the following comments lightly.

Dogs have no impact on the bank swallows at Fort Funston.

The GGNRA/DEIS used deeply flawed "science" to justify removing off leash dogs from most of Fort Funston in its Preferred Alternative. The DEIS claims (table, page 1265) that allowing off leash dogs to remain would have "long term minor to moderate adverse impacts" on the bank swallows because "continuing impacts from dogs and/or humans would include digging at or collapsing the burrows, flushing birds from nests, and causing active sloughing and landslides that may block or crush burrows." In fact, there is no evidence that dogs have any impact on the bank swallow colony at Fort Funston and, specifically, no evidence that they dig at or collapse burrows, flush birds, or cause landslides that crush burrows.

The DEIS cites two sources for its claim of adverse impacts: Bank Swallow Monitoring at Fort Funston, Golden Gate National Recreation Area 1993-2006. Golden Gate National Recreation Area, San Francisco, CA. (NPS 2007e), and Wildlife Response to Habitat Restoration in Fort Funston, Golden Gate National Recreation Area, California, Final Report prepared for the NPS. November 2004. (USGS 2004) Neither study documents any

impact on the bank swallows. USGS 2004 offers no evidence of any disturbance to bank swallows. When USGS 2004 says, "dogs were recorded in restricted areas," the restricted areas are not the bank swallow protection area, but rather the 12-acre native plant restoration area in the dunes inland from the bank swallow colony, together with other restricted areas that together make up most of the north end of Fort Funston. The DEIS describes the restrictions around the bank swallow colony, on the beach below and the bluff tops above, and then cites USGS 2004 to say dogs were in "restricted areas," falsely implying that this is the bank swallow restricted area (p 1263, and Map 16-A). Compare Figure 2 in USGS 2004 with Map 16-A in DEIS to see the radically different "restricted areas." USGS 2004 does not report any dogs in the bank swallow restricted area. In fact, the study didn't observe any bank swallows at all, in either the native, plant-restored protected area or the bank swallow protected area.

When the authors of USGS 2004 prepared a version of the same study for publication in a refereed scientific journal ("Wildlife Response to Coastal Dune Habitat Restoration in San Francisco, California" by Russell, Shulzitski and Setty, *Ecological Restoration*, Vol. 27, No. 4, 2009), they made only one passing mention of dogs: "Although a small number of visitors and their pets continued to use the restricted areas, the measures [post-and-cable fences] were successful for the most part." In either version, USGS 2004 contributes no evidence of any impact of dogs on bank swallows.

The DEIS relies mainly on NPS 2007e for the false claim that dogs have an adverse impact on the bank swallows at Fort Funston. The data document for NPS 2007e ("BS_data_public.xls" provided by GGNRA during Negotiated Rulemaking) reports that monitors observed a few dogs (none in some years, a total of three (3) for the years 2001-2006) in the "closed area" around the bank swallows. That's all the evidence there is, the mere presence of a few dogs. The final paragraph of the NPS 2007e consists of alleged "disturbance events" that are unconnected to the report's data and a long list of "potential impacts." Most of the "disturbance events" and "potential impacts" have nothing to do with dogs. Collapsing burrows, flushing swallows from nests, and causing landslides are "potential impacts," not observed events. From "potential impacts" in NPS 2007e, DEIS leaps to "Dogs could likely (emphasis added) dig at or collapse burrows..." (p. 1263) How something that could potentially happen became likely to happen is not explained. Then the DEIS escalates "potential impact" and "could likely" into a "continuing impact." (p.1265) Again, how something that might happen became something that will continue to happen is not explained. Note that, still, no one has seen a dog collapse a bank swallow burrow, flush a swallow, or cause a landslide in the bank swallow colony at Fort Funston.

Daphne Hatch is the author of NPS 2007e. She participated in construction

of the Attribute Tables for the NEPA analysis in preparation for the DEIS. Ms. Hatch wrote during Negotiated Rulemaking in 2007, while discussing the attributes at Fort Funston (after the 1993-2006 bank swallow monitoring was complete), "No documentation of loss of nests or young to people or dogs that I am aware of..."

It is significant that adverse impacts of dogs on swallows have not been observed because people have been out there looking for them. A GGNRA researcher closely monitored the bank swallow colony in 1994 and 1995 and wrote an official report. (1994-95 Bank Swallow Annual Report, Nola Chow, 1996) Chow observed that there were dogs present, and noted they did not disturb the swallows. She also listed a number of things the GGNRA should do to protect the bank swallow colony, but doesn't mention the dogs. Chow's monitoring is part of NPS 2007e, but her report isn't included in the twenty-seven page bibliography attached to the DEIS. Chow's observations of dogs with no impact on swallows are not reported in either the DEIS or in 2007e. The entire 1993-2006 GGNRA bank swallow monitoring project hasn't documented any dog-caused burrow collapses, swallows flushed from nests by dogs, nor any dog-caused landslides crushing burrows.

We should not be surprised that dogs have no impact on the bank swallows. Barrett Garrison is recognized as a bank swallow expert by GGNRA; he has two listings in the DEIS list of references. Garrison says in Bank Swallow, "Bank Swallows appear relatively insensitive to moderate levels of human-induced disturbance." Garrison lists documented land uses around Bank Swallow colonies: hydroelectric power generation, irrigation, recreational boating, commercial agriculture, vehicular and pedestrian traffic, and livestock grazing. They nest in active quarries and in busy road cuts. Garrison says, "These land uses appear relatively benign as long as the integrity of the nesting bank remains," and, "... are unlikely to have substantive adverse impacts to Bank Swallows."

The bank swallows nest in burrows in the cliff faces above the beach at Fort Funston, and fly directly from the burrows to feed over Lake Merced to the east. They return directly to the cliff face burrows. During 90+ hours of sitting on the beach beneath the bank swallow colony I saw many dogs on the beach. But I didn't see a single dog that showed awareness that the swallows were present. People who do not go specifically looking for the swallows don't notice them either. The swallows don't interact with, or react to, people or dogs.

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

A committee of the National Academy of Sciences recently evaluated the work of National Park Service scientists regarding oyster culture in Drakes Bay. NAS reported in a news release, May 5, 2009, that, National Park Service scientists, "selectively presented, overinterpreted, or misrepresented the available scientific information," and, "exaggerate[ed] the negative and overlook[ed] potentially beneficial effects." Likewise, GGNRA/DEIS selectively presents, overinterprets, and misrepresents the available scientific information when they claim dogs have an adverse impact on bank swallows at Fort Funston.

All of the unsubstantiated, incorrect references to adverse impacts of dogs on bank swallows must be removed from the DEIS. There are other unsubstantiated statements of adverse impacts at Fort Funston contained in the DEIS which I will cover in other comments. When all statements without supporting evidence are removed, Alternative A must be re-evaluated. Only when the unsupported speculations are removed can Alternative A be properly evaluated.

Add some off leash areas in the GGNRA sites in San Mateo to Alternative A and you will have a really preferred alternative.

Sincerely, Keith McAllister Oakland, CA 94611

Cc: Senator Dianne Feinstein Representative Nancy Pelosi Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director Fort Funston Dog Walkers (FFDW) San Francisco Dog Owners Group (SFDOG)

Correspondence ID: 4621 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: Draft Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean,

GGNRA/DEIS casually dismisses the major adverse impact on those people who will lose an important recreational resource under the various alternatives. Off leash recreation in the GGNRA is a major recreational resource, and it can't be ignored in an EIS. The adverse impacts on thousands of current GGNRA visitors who will lose a crucial recreational activity at most sites under most alternatives must be identified, analyzed, and evaluated.

RECREATION

GGNRA/DEIS's disregard for the thousands of visitors who use GGNRA sites for dog walking recreation is most pronounced in discussions of "visitor use and experience." There is no discussion at all of recreation as a resource to be preserved. GGNRA/DEIS does not acknowledge that thousands of people use the Golden Gate National Recreation Area daily for legitimate outdoor recreation when they walk with their dogs off leash. Losing that recreation would be a major adverse impact on a huge group of GGNRA visitors.

GGNRA claims the adverse impact on dog walking visitors of losing most of the off leash area at Fort Funston (Preferred Alternative, p 1530) would be "minor." At the same time, the impact on those who oppose dog walking would be "minor to moderate adverse," even though off leash dogs would be banned from most of Fort Funston, and all dogs banned from half the beach. These impacts are rated with no attempt to determine the sizes of the groups affected. Thousands of visitors would lose their off leash recreation, which is a major adverse impact to them. The number of people who visit Fort Funston and are adversely impacted by the presence of dogs is not determined. The number of people who would visit Fort Funston if the dogs were not there is not determined.

The claim that there are many people who would visit Fort Funston if dogs were not there is not only unsupported by evidence, it is counter-indicated by the other restored dune scrub sites in San Francisco. The Point Lobos Reserve and Parcel 4 (Balboa and Great Highway) have virtually no visitors. It is a myth that there are large numbers of potential visitors who want to look at native plants and dune scrub, but avoid Fort Funston because of the dogs there.

When the ability to take a real walk at Fort Funston with an off leash dog is replaced with the opportunity to watch that dog play in a ROLA, people lose real recreation. GGNRA/DEIS does not seem to realize that it is people's recreation that is at issue. Walking with one's dog is the recreation; watching that dog play in a ROLA is not the same thing at all. GGNRA/DEIS does not acknowledge or evaluate the lost recreation. That is arbitrary and capricious.

GGNRA/DEIS weighs the desire of some people not to see dogs (even though they can continue to hike, picnic, fly kites, ride bikes, watch birds, ride horses, hang glide, etc.) more heavily than the impact on people who will lose outright their recreational activity. This is pure prejudice on the part of GGNRA staff that dog walkers are not legitimate recreational visitors, but all the other visitors are legitimate. This prejudice is arbitrary and capricious.

HUMAN HEALTH and SAFETY The impact on the health of dog walking

park visitors who lose this recreational activity is not even acknowledged in the numerous discussions of "human health and safety." Walking with off leash dogs is the only regular, active, outdoor recreation many of us seniors get. Only adverse impacts on visitors and staff from the presence of dogs are considered (and exaggerated) in the DEIS. The benefits to health and safety that visitors (especially seniors) get from exercise and community are not discussed, quantified, or included in DEIS analysis.

The evidence for the health benefits to seniors from walking with a dog is too over-whelming for GGNRA/DEIS to ignore if alternatives are to be genuinely evaluated. From The Journal of Physical Activity and Health, Vol 8, Issue 3, March 2010: Researchers Reeves, Rafferty, et al. studied 5902 adults in Michigan and found the odds of doing long term physical activity were 69% higher for dog walkers than non dog walkers. They found that among dog owners who took their pets for regular walks, 60 percent met federal criteria for regular moderate or vigorous exercise. About a third of those without dogs got that much exercise. From the American Journal of Public Health, Jan 2008: Researchers Cutt, Giles-Corti, et al. found "the adjusted odds of achieving sufficient physical activity and walking were 57% and 77% higher among dog owners compared with those not owning dogs." The New York Times of March 14, 2011 reported several other studies that reached the same conclusion. A study of 41,500 Californians found that people who owned dogs were 60% more likely to walk for leisure than those with a cat or no pet at all. This meant an extra 19 minutes a week, on average, of walking for the dog owners. In another study, seniors in an assisted-living facility improved walking speed by 28% if they walked with a dog but only 4% if they walked with a human companion. The impact on human, especially senior, health of losing their traditional recreational opportunities in GGNRA is a serious matter. Watching a dog play in a restricted ROLA is not active exercise with the same health benefits as walking with that dog. It is arbitrary and capricious for GGNRA/DEIS to dismiss the issue entirely without any evaluation.

The presence of off leash dogs at GGNRA sites is claimed to have a "moderate adverse" impact on health and safety (e.g. Alternative A at Fort Funston), but if those dogs are displaced to a non-GGNRA site, the impact is "negligible to minor adverse." (e.g. Alternative C in Marin Headlands) It's because GGNRA/DEIS doesn't quantify and evaluate the claimed adverse impacts, that the same condition can have different impacts on two different pages of the DEIS.

Only Alternative A, no change, avoids sacrificing the recreational resources and health benefits that so many GGNRA sites provide to so many visitors. If off leash recreation is also provided in GGNRA sites in San Mateo County, a truly preferred alternative would be created.

Sincerely, Keith McAllister Oakland, CA 94611

Cc: Senator Dianne Feinstein Representative Nancy Pelosi Ken Salazar,
Secretary of Interior Jon Jarvis, National Park Service Director Fort Funston
Dog Walkers (FFDW) San Francisco Dog Walkers Group (SFD OG)

Correspondence ID: 4622 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

I am an almost everyday user of Fort Funston. Accordingly, my comments are limited to Fort Funston even though I did thoroughly peruse the entirety of your 2,000 + page report. I should note at the onset that your report can best be described as all fluff with little if any substance or critical statistical and analytical data capable of verification or authentication. The "preferred alternative" described in the DEIS will negatively impact my use of Fort Funston and impact my physical and mental health. Much of the information upon which the "preferred alternative" is based appears to be inaccurate and/or incomplete information.

Safety - The DEIS does not contain any user site survey of Fort Funston. NPS public spokesman Howard Levitt publicly state4d in my presence at an NPS community meeting that no user site survey of Fort. Funston has been conducted by, or on behalf of, the NPS. The DEIS repeatedly refers to safety issues related to dog bites. The only actual data in the DEIS pertaining to dog bites is the Law Enforcement Data (Appendix G) which reflects for Fort Funston "4 bite/attack" which is useless information without a site survey of users to determine if the reported incidents are statistically relevant. Nor does the data include a description of the severity of any incident (i.e., skin broken, medical attention required, etc.) The category " 10 haz coed/pet rescue" is noted to include "cases of simple assault, case of injured person, case threats" which appear to include actions of persons, not dogs. What exactly is being reported? Such a broad sweeping reference without inclusive analysis is legally meaningless and appears to be puffery by NPS. In fact, the entire report is replete with adjectives and adverbs but without meaningful data One could say that the entire compilation reads like a conclusion was reached and staff was then directed to support it. Interesting. There simply is no statistical data as to the daily number of visitors, the daily number of dogs, and what the Fort Funston visitors are or are not doing (i.e., walking dogs, walking, hang gliding, flying radio controlled airplanes, practicing cliff rescue, watching the ocean, etc.) While I have not done a survey, I would be willing to state that the categories just listed cover

90+% of those who visit Fort Funston.

The DEIS does not include any discussion of the inherent danger of the beach at Fort Funston due to the extreme undertow and riptide conditions present throughout the year. All native San Franciscans understand the very significant danger presented at this stretch of coastline. Any use of the beach should, for public safety, be restricted from swimming.

The DEIS does not include any discussion of the safety concerns of having children at Fort Funston due to the irregular/remote/hilly topography, the very dangerous cliff area (constantly eroding from wind and rain and often not visible due to fog) and the dangerous beach.

The "preferred alternative" will create a dangerous situation for humans and dogs by limiting off leash to the area immediately adjacent to the north side of the parking lot. This area is far too small to accommodate the large number of daily walkers and dogs which will result in injury. There is no information in the DEIS as to how this specific amount of Fort Funston was allocated for off leash in the "preferred alternative". No data in the DEIS supports this allocation of limited space to off leash activities (beach off leash discussed below). Without supporting statistical and verifiable data, the basis of this allocation appears to be arbitrary.

2. Soundscape -

The DEIS does not include relevant information related to the soundscape at Fort Funston and cites dog barking as an issue. As an almost daily user of Fort Funston, it is my experience is that there is very little dog barking, and what dog barking does occur primarily occurs inside vehicles in the parking lot. Changing the current off leash to the "preferred alternative" will not decrease dog barking. In fact, the change to the "preferred alternative" will result in the increase of dog barking in other parts of Fort Funston as the "preferred alternative" off leash areas are too small to accommodate the amount of users (for which NPS has not conducted any accurate statistical site survey of users), and dogs restrained on leashes in other parts of the Fort are much more apt to bark than when they are off leash.

No reference is made in the DEIS to the constant noise from the very heavy use of Hwy 1-Skyline Blvd by cars, trucks and buses. This can be heard in all parts of Fort Funston with the exception of the beach. No reference is made in the DEIS to the gunshot noise of the Pacific Rod & Gun Club range adjacent to Fort Funston which can be heard through all areas of the Fort, excluding the beach area. No reference is made to the noise from the SF Police Gun Range adjacent to the Fort Funston, that seemingly is operated 24/7 and can be heard through all parts of the Fort, excluding the beach. No reference is made in the DEIS to the noise made by the hang gliders. No

reference is made in the DEIS to the noise made by model airplanes. No reference is made in the DEIS to the noise generated by the significant number of SFO passenger jet takeoffs over Fort Funston and / or parallel to the beach and in climb out prior to turning eastbound (depending on SFO flight rules then being utilized.)

Bank Swallows/Native Species/Habitat Protection -

The DEIS claims that off leash dogs are interfering with the nest of the Bank Swallows which are located on the cliffs at the beach. While every once in a while an errant dog falls over the cliffs by accident, this is unusual experience and not done to interfere with a bird. In fact, I have never seen a dog anywhere near the cliffs paying the least bit of attention to any bird. People climb the cliffs and also fall over them but the DEIS does not include any analysis of the effect of the human interference with Bank Swallows or other native inhabitants. In addition, no statistical data is provided pertaining to the large number of cliff rescues by the Police, Sheriff, Fire Department, Coast Guard. There must be data available because the various departments are frequently present on site practicing and / or rescuing.

The DEIS fails to address the effect of the large invasion of the non-native crows/ravens at Fort Funston on the native species of birds and animals. Look around. There is not a seagull to be found at Fort Funston. The seagulls were previously at the Fort. Now they are at Lake Merced. I doubt the hanggliders drove them off. I doubt the dogs drove them off. However, the crows/ravens have invaded the cliff areas, have driven off most all of the other birds and appear to eat everything and anything. They show no fear of dogs or humans. The DEIS fails to address the destructive effect these birds are having on the native birds and animals of Fort Funston.

Dog Feces -

The users I have observed at Fort Funston have been quite proactive in collecting and disposing of dog feces. Although not mentioned in the DEIS, the NPS "poop patrol" collects the feces approximately every 1.5 - 2 hours from the various waste disposal sites. Therefore, the NPS must have records of the volume of dog feces which is collected and disposed of correctly. In addition there are volunteer clean up the entire area throughout the year programs. Those volunteers pick up all kinds of things from dog feces to litter in general.

Also, the "preferred alternative" will not change the amount of dog feces or make any change in the percentage of persons who comply with the feces pick-up requirements. Whether a dog in on leash or off leash will not change the amount of dog feces. There is no statistical data contained in the DEIS

that there is any real dog feces issue affecting Fort Funston.

Diversity/Discrimination Against Seniors and Disabled-

The DEIS claims under the Environmental Justice section that Hispanic and Asian users of the GGNRA cited dogs as a problem. There is no data in the DEIS for Fort Funston. Obviously the writers of the DEIS are not users of Fort Funston as there is a very diverse population utilizing this property. There are Caucasians, African Americans, Chinese, Japanese, Filipinos, etc. all present on a daily basis. In addition to ethnic diversity, Fort Funston users demonstrate a vast array of sex, age and economic levels. Many seniors utilize Fort Funston. Many disabled persons utilize Fort Funston. The "preferred alternative" will be detrimental to seniors and disabled persons who utilize Fort Funston. Many seniors and physically disabled persons who utilize Fort Funston do not want to walk through sand. The off leash areas described in the DEIS require the owner to walk through the sand near the parking lot in order to monitor/voice control their pet, or climb down to the beach to access an off leash area. Many senior and disabled persons are unable to make the trek to and from the beach on the sand ladder. The descent to the beach is both arduous and dangerous as the steps are large and uneven. It is easy to lose one's balance. The "preferred alternative" requires that the dog remain leashed while the descent and ascent is made. This is dangerous for both the owner and the animal as any misstep by either can result in very serious injury.

Further many senior or disabled persons want dogs under voice control as it allows them not to have to exert any physical strength with the upper extremities. Many middle aged women suffer from degenerative rotator cuffs which preclude walking a dog on leash. Other disabled or seniors have balance issues. Voice control allows the dog owner to have the availability of both arms to aid in their balance and protect themselves if an accidental stumble should occur. The "preferred alternative" would deprive seniors and disabled persons from the ability to avoid physical injury.

Water Discharge/Erosion of Cliffs/Toxic Substances -

The DEIS fails to address the pre-existing sewer lines of San Francisco and Daly City which go under Fort Funston and discharge into the ocean. The DEIS does not address the effect on the environment of the sewer lines and the huge excavation which was performed in the last year to update these sewer lines and attempt to stabilize the cliffs which had receded 75 feet in the last 30 years due to the effects of nature (not dogs).

The DEIS fails to address the toxic substances which remain at Fort Funston due to the occupation of the site by Coast Artillery in World War II and the subsequent use as an Army Nike missile site. There is no reference to the

leaching of these toxic substances and their effect on the environment. While it is true that a certain amount of mitigation of hydraulic fluid from Nike missile handling equipment still remaining on the site and still underground has been done, the very personnel performing the mitigation for the Federal government indicated they don't really know what else is underground, where all the equipment is actually located, what the current condition of that equipment is, and, last but not least, where it will leak next. The DEIS also fails to address unexploded ordinance which continues to still be discovered at Fort Funston. The DEIS also fails to address the exploded ordinance (lead) mixed into the soil throughout the site and still being discovered by even the most casual observer.

Vegetation -

The DEIS does not address the effect of the shifting sand due to nature water) as affecting vegetation, or the extent vegetation has been lost due to excavation at Fort Funston. (What I have overheard are group leaders giving lectures to student groups stating that the major cause of the erosion is "running dogs.")

Wildlife -

The DEIS does not have data to support conclusions/assumptions. What wildlife? I assume you conclude the dogs are again the cause.

Visitor Use & Experience -

The DEIS does not have data to support conclusions of "preferred alternative". This "preferred alternative" will result in major adverse cumulative impacts for myself and many other users of Fort Funston. In that NPS has not performed a site survey at Fort Funston, it is amazing that the DEIS can support the "preferred alternative" when the user population has never been surveyed.

Conclusion -

The National Park Service is operating a recreational area, not a park. Comply with the directives that created the GGNRA in the first place. I object to the conclusions of the DEIS as they lack any viable quantitative and scientific basis. There simply is no substance to your report. Site specific information is lacking for Fort Funston. If the NPS proceeds with the "preferred alternative" the NPS will be depriving thousands of people recreational use of Fort Funston. I would expect a higher level of conduct and professionalism from the NPS.

If it is the intent of the NPS that Fort Funston remain an abandoned army

base, it will be accomplished under the 'preferred alternative". In addition, the poison pill included in the DEIS which automatically allows the NPS to allow no voice control dogs is an insult to every citizen. Why don't you more appropriately utilize funding because in the alternative Congress must consider NPS reductions since NPS does not appear to spend taxpayer dollars in the best interest of those using Fort Funston.

Very truly yours, Thomas A Bogott Washington, D.C. 20510 Senator Barbara Boxer 112 Hart Senate Office Bldg. Washington, D.C. 20510 Congresswoman Nancy Pelosi 235 Cannon House Office Bldg. Washington, D.C. 20515 Congresswoman Jackie Speier 211 Cannon House Office Bldg. Washington, D.C. 20240 Assemblywoman Fiona Ma State Capitol P.O. Box 942849 Sacramento, CA 94249 Mayor Ed Lee City Hall 1 Dr. Carlton Goodlett Place, #200 San Francisco 94102

Correspondence ID: 4623 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

I am writing to voice my opinion regarding the dog management proposal for the GGNRA. I am Chinese-American, a resident of San Francisco and former lab researcher in the UC system for 35 years. Although retired from UC, I currently work part time for a private dental practice. As an active "older" person, I also volunteer for the California Academy of Sciences as well as dog/cat rescue organizations in San Francisco. I have been a frequent volunteer dog walker for the last 6 years, and the caretaker of my cat for the last 10 years. I also have a great appreciation for nature and have participated in hikes and bicycle rides in the Bay Area through Sierra Club, etc.

I have never avoided the GGNRA or other dog populated areas for fear of off-leash dogs, contrary to the statements espoused in the DEIS. I have walked dogs at Fort Funston and only had positive experiences. Off-leash dogs provide a unique means of meeting & socializing with others who share similar interests. There is always a diverse group of people walking at Fort Funston: families, seniors, minorities, disabled, etc. Off-leash activity is essential to the health of our city for a myriad of reasons. The benefits of human-animal interactions should not be undervalued.

Regarding the proposed GGNRA changes, I oppose the Preferred Alternative because it is overly restrictive and punitive to responsible dog walkers and their dogs. I would like to see the Park Service revise the dog management plan to formalize the existing GGNRA dog policy (aka the

1979 Pet Policy) plus provide for balanced off-leash areas in San Mateo County and new lands and remove any proposed rules to reduce or ban dog recreation based only on violations. Compliance-based management strategy cannot be part of any plan. The actions of the few irresponsible dog walkers should not jeopardize the status of the overwhelming majority of walkers with off leash dogs.

I would like a revised plan to measure the impact of dog recreation on the health and well-being of people and the impacts of any changes to adjacent lands and communities. I would like to see disadvantaged groups and others able to provide unfiltered comments on their preferences and barriers to using the GGNRA. I also believe the GGNRA should provide better signage and that a revised plan should include awareness programs. A revised DEIS should exclude speculative, exaggerated, or misleading statements and provide site-specific need for actions and dismissals of suggested alternatives. Objective standards need to be applied to any recreational activities.

The GGNRA should develop a new alternative, the A+ Alternative, which will better balance the recreational needs of the Bay Area with protection of natural resources.

Thank you for your time.

Jennie Chin

Correspondence ID: 4624 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Barbara Joy Davis. I live in Alameda in Alameda County. I am a senior citizen. I frequently visit Ocean Beach.

I strongly believe that multi-use open space that includes off-leash dog walking is compatible with all other recreational uses and with the preservation of habitat and wildlife within the GGNRA.

All users (including cyclists, hikers, people with kites and Frisbees, picnickers, festival-goers, the Fleet Week crowds, and even wildlife) clearly have some impact on the GGNRA. In the Draft Environmental Impact Statement the National Park Service inappropriately singles out dogs. Its conclusions are not based upon sound science nor long-term monitoring of

site-specific conditions.

Any impact that dogs may have can be effectively mitigated through better signage, creating environmental barriers, and education of park users. The GGNRA should partner with community, animal welfare, and conservation organizations on programs that could eliminate perceived problems and contribute much-needed resources.

The GGNRA was created to provide open space for recreation (including dog walking) for the metropolitan Bay Area. The existing 1979 Pet Policy has served the community extremely well for more than 30 years. I strongly support Alternative A, the No Action alternative, in the GGNRA and the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho Corral de Tierra in San Mateo County).

Respectfully, Barbara Joy Davis

Correspondence ID: 4625 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Letter

Correspondence: I've been nipped in the butt by one of two off leash German shepherd dogs on the lower hillside of Milagra Ridge. This was a dog whose owner was calling him back as he charged the thirty feet to me. He was not responding to her voice control. It's as if someone is pointing a loaded gun at you to have a dog which can spring into action with or without command. I wouldn't say it was a viscous attack but I had bruise points where the teeth hit but no punctures.

On Pacifica's ocean front levee I had to dance for a smaller dog as it was circling around and biting at my shins. It was almost comical because the dog had a leash attached and the owner was scrambling around trying to pick it up where it was dragging on the ground. The couple had two dogs and both were yelling at their barking biting dog. Another observer, as well as myself, told them to get the dog off. The dog's teeth only caught my cuff.

A most intimidating encounter was with "Chico". The tiny dog charged out in front of his masters as he came at my ankles yip yipping, as a Chihuahua does, and made several approaches and raised a ruckus as we were passing. But most surprising was that J had to watch my backside because he even launched another charge run fifteen feet back at me. This couple also had two dogs off leash and we were in the GGNRA posted area of Mori Point.

I've seen a mother in the oceanfront picniC area have to scramble across her

picnic blanket to protect her youngster from a gamboling labrador which was not on leash. Then I heard the thoughtless remark by the owner, "he's friendly". A large dog can do damage to you by bumping into you. Just ask my wife who needed knee surgery after a friendly dog bump. Additionally, I know people whose dog;s were mauled and seriously damaged by another dog. They were unable to make a case against the offending dog's owner because their own dog was not on leash.

Older people, older couples and set-in-their ways youngsters who believe that suburbia and a/l open park lands are their dog's unrestricted domain, have to accept the new reality of many people and wildlife sharing the same space. Dog owners are a minority group and dogs don't have civil rights equal to citizens.

Until recently we had a pet cattle dog but opted to leash him when it became an enforced county law. I think I knew him well enough to not trust him in all drcumstances. My dog was not a factor in any of these incidents I mentioned as he was not along with me when they happened. I am for leashing dogs on city streets, on beaches and in parks including GGNRA lands.

I also think that along with a dog and cat's licensing, there should be a waste management fee for the processing of feces and litter, whether flushed down the toilet or thrown in the garbage,.can/based on animal size and paid to the licensor. But don't get me started.

Sincerely, John Meria

Correspondence ID: 4626 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: May 26, 2011 Frank Dean, GGNRA Superintendent Building 201, Fort Mason San Francisco, CA 94123-0022

Dear Superintendent Dean,

Thank you for the opportunity to comment on this important document, the Golden Gate National Recreation Area's (GGNRA) Draft Environmental Impact Statement/Draft Dog Management Plan (Draft Plan/DEIS).

You will be receiving much of the information included (in black type-face) in this document from other members of the Eco-Dog Coalition.

Eco-Dog was formed under the auspices of the San Francisco SPCA. It is an

umbrella organization of groups in San Mateo, San Francisco and Marin Counties that represent environmentalists who exercise with their dogs in the GGNRA. We advocate for responsible and respectful use of the GGNRA lands, and for consideration of other users. We have been working together in Eco-Dog for the past year preparing for our response to the GGNRA Draft Plan/DEIS.

Since, most of us do not have the technical knowledge required to address the numerous nuances of NEPA law, much of the more technical information in this letter was prepared for Eco-Dog by Ken Weiner, a NEPA attorney, and Tetra Tech, an environmental consulting firm.

We are writing this letter as representatives of Marin Unleashed. Our specific concerns are with the GGNRA lands in Marin County. We have included our lay comments in blue type-face.

Introduction

The GGNRA plays a critical role in providing a home for many natural and cultural treasures, and, because of its proximity to a dense, urban environment, it provides special recreational opportunities to city dwellers. Recreation is called out in the 1972 GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognized that the achievement of these outstanding values is not mutually exclusive. Our organization supports the National Park Service (NPS) in its mission to protect the GGNRA's important natural, cultural, and recreational values but, through this letter, we challenge the NPS work with its constituents to find solutions that are designed to protect all of the park's values and broaden opportunities to enjoy its diverse resources sustainably.

Our comments are described in two main sections: (1) Recommended Alternative, which describes our thoughts on how the NPS could balance the GGNRA's myriad resources and opportunities; and (2) Quality of Information in the Draft Plan/DEIS, which describes our thoughts on how the information in the Draft Plan/DEIS could be improved in order to support a better outcome for all interests involved.

Marin County Exclusion

As representatives of human's with dogs in Marin, we have an additional comment about the process used by the National Park Service to include public involvement on dog management in the GGNRA.

The Regulated Negotiated Dog Management Rule Making Committee (Reg. Neg. Committee) was formed in response to the 9th District Court Ruling

requiring public notice and involvement in the formation of dog management rules for the GGNRA. When the Federal Register came out announcing the formation of the Reg. Neg. Committee, the list of proposed stakeholders did not include anyone from Marin County representing those of us who walk our dogs in the GGNRA in Marin. We addressed this omission to Superintendent O'Neil with a request for inclusion; we were denied a seat at the table.

We also requested inclusion through our local elected officials. We were still denied membership on the Reg. Neg. Committee. We were instead begrudgingly offered one seat on the Reg. Neg. Technical Sub-committee.

We contend that this exclusion resulted in excluding many of the GGNRA areas in Marin County from discussion during the Reg. Neg. Committee process and from the Draft Plan/DEIS. The Reg. Neg. Committee never discussed the 1979 on-leash areas in Marin, nor did it discuss most of the off-leash areas. Few of the areas that were included in the 1979 Pet Policy for Marin are found in the Draft Plan/DEIS preferred alternatives for Marin.

There were only three Marin areas that were discussed during the entire Reg. Neg. Committee process: Rodeo Beach, Muir Beach, and Oakwood Valley. Our representative on the Technical Sub-committee attempted to introduce a discussion of Alta Avenue, the most regularly used area in the GGNRA in Marin by humans with dogs, and was told that discussion would not be allowed and should not be brought up again.

The Draft Plan/DEIS claims that the Reg. Neg. Committee had formed consensus on one area: Oakwood Valley. This is not true, there was no consensus on any area at anytime during the Reg. Neg. Committee process. Oakwood Valley came up during the last two Reg. Neg. Committee meetings. By that time it was clear to one and all that the two 'sides' would never reach agreement on anything.

When Oakwood Valley came up for discussion, the 'anti-dog' side said they could live with a double-gated dog run on the western portion of the Oakwood Valley fire road. The 'pro-dog' side said (with sarcasm), "and let's fence it, too". That resulted in a claim in the Draft Plan/DEIS that consensus was reached, it was not. We implore you, please do not put a fenced and double-gated dog-run at Oakwood Valley, it would be an expensive travesty.

Recommended "Hybrid" Alternative

First, we have a suggestion that is applicable no matter what rules the NPS adopts:

The most important aspect of dog management (as with every management issue) is clear communication, e.g. signs, brochures, websites, and maps all provide, the same information in a clear concise manner. To date, this has not been the case with dog management in the GGNRA. Much of the conflict between humans about dogs in the GGNRA is a direct result of conflicting rules, and of the public's versus the Park Rangers' and Park Police's understanding of these rules. There are many trail signs in the Headlands that say 'no dogs' or 'dogs on-leash' in direct conflict with the Headlands map that correctly represents the current rules (the 1979 Pet Policy). It is no wonder if there have been resulting conflicts between GGNRA visitors, and with Park Staff.

We have two proposals:

1) Allow access into the GGNRA in Marin to humans with dogs from the communities that border the GGNRA; allow access to humans with dogs on the fire roads that run around the borders of the GGNRA with the neighboring communities, e.g. Sausalito, Marin City, Tam Valley, Homestead Valley, Mill Valley, Muir Beach.

We propose on-leash access on these fire roads, with the exception of Alta Trail (a fire road) between Donahue Ave. and Orchard Fire Road. Please see 2 below for this area.

2) Retain the 1979 Pet Policy (Alternative A) in the following areas: Rodeo Beach (north and south ends), Muir Beach, Homestead Valley, Alta Trail between Donahue Ave and Orchard Fire Road, Julian Fire Road between Mc Cullough Road and the Historic Firing Range, and the Old Bunker Loop near Rodeo Beach.

Further information on this alternative is included in Appendix A. Quality of Information in the Draft Plan/DEIS

Before jumping into the technical evaluation of the Draft Plan/DEIS done by Mr. Weiner and Tetra Tech, we would like to point out one discrepancy and one omission discernible to a lay person:

1) The summary of the Preferred Alternative for the Marin Headlands Trails on page 105 of the Draft Plan/DEIS and the Preferred Alternative Map of the Marin Headlands Trails disagree; the former includes the Julian Fire Road from 101 to Rodeo Beach on-leash, the latter does not.

2) The Draft Plan/DEIS Maps do not include the northern portion of the Headlands, i.e. the portion that includes County View Road and the Miwok Trail above Tennessee Valley. Both of these fire roads are included in the 1979 Pet Policy for on-leash dog use; the Draft Plan/DEIS seems to have

excluded them from consideration (as did the Reg. Neg. Committee meetings). My organization's major concerns with the quality of information in the Draft Plan/DEIS include:

1. Omission of relevant impacts and impact analyses o Recreation (also see Appendix B) o Other impacts
2. Insufficient information needed to draw logical conclusions and evaluate alternatives: o Unclear enforcement data (also see Appendix C) o Lack of and inconsistent site-specific, scientific data on baseline conditions (also see Appendices D, E, and F) o Reliance on undocumented assumptions o Flawed evaluation of No Action alternative o Resultant flawed alternatives analysis
3. Improper treatment of new lands 4. Lack of specificity in proposed action

These concerns are described in detail below and several are outlined further in the attached appendices. At the end of each section, we have provided recommended changes that we request you make to the EIS and the proposed action in order to move forward with a plan that is protective of all of the GGNRA's myriad resources and values.

1. Omission of Relevant impacts and Impact Analyses

Recreation

Congress' original intent when it established the GGNRA is stated in the bill reports for the 1972 legislation 'that GGNRA, "will ensure its continuity as open space for the use and enjoyment of present and future generations of city-dwellers" [House Report No. 92-1391, Sept. 12, 1972]. [emphasis added]. Similarly, as stated in the first section of Public Law 92-589, Congress established GGNRA to preserve for public use and enjoyment areas of Marin and San Francisco County possessing "outstanding natural, historic, scenic and recreational values" and to "provide for needed recreational open space necessary to urban environment and planning" and to protect the scenic and natural character of the area from incompatible development.

Dog walking was well-known and recognized by Congress as part of this public use and enjoyment. Both the Senate and House reports comment that the proposed area:

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

The official legislative history notes:

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

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

"The mission of the Golden Gate National Recreation Area is the preservation, unimpaired, of the natural and cultural resources, and scenic and recreation values, of the park for present and future generations to enjoy." [emphasis added] The Draft Plan/DEIS not only fails to disclose and evaluate the impacts of the alternatives on recreational resources in the context of an urban environment, it dismisses the quality of the urban environment entirely on page 22 where it states, "the quality of urban areas is not a significant factor in determining a dog management plan." As recognized in its enabling legislation, one of the most important aspects of the GGNRA is the sharp contrast between its undeveloped open spaces and the adjacent developed urban environment. The GGNRA's open space and recreational opportunities are intended to provide refuge and relief for nearby urban dwellers.

The impacts on the GGNRA's open space and recreational opportunities should have been evaluated fully in the Draft Plan/DEIS, especially since a NEPA analysis is not limited to the natural environment. According to NEPA, An EIS is required to analyze the human environment. The federal NEPA rules define the human environment and its scope in an EIS as follows:

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

When an EIS is prepared and human and natural/ physical environmental effects are interrelated, the EIS should discuss all of these effects on the human environment.

*Recommendation. Any significant limitations on recreational uses proposed by NPS needs to be properly examined, as it impairs a fundamental value that must be preserved under GGNRA's charter. The Draft Plan/DEIS should be revised to include a stand-alone analysis of

impacts on recreation resources in order to fully consider the potentially significant effects that the proposed action and action alternatives could have on these elements of the human environment. The section should give context to the important role played by the GGNRA in terms of its proximity to a dense, urban environment and the special opportunities it affords to nearby populations. It should describe existing recreational uses of the GGNRA and other parklands in the project vicinity, the impacts of the proposed action on recreation resources and urban quality (including direct, indirect and cumulative impacts), and the mitigation that the NPS will commit to in order to avoid such impacts.

Although the analysis of impacts on recreation resources could potentially be integrated into the existing Visitor Use and Experience section, it is strongly suggested that it be incorporated into the draft EIS in a separate chapter. The rationale for this request is because the topic of "Visitor Use and Experience" is too limiting to encompass the broader range of recreation impacts that could potentially occur with implementation of the proposed action, including degradation of established recreational activities and facilities in GGNRA and nearby lands. A suggested annotated outline of the stand-alone recreation resources section is presented in Appendix B for your consideration.

Other impacts

The Draft Plan/DEIS assumes but does not provide the required rigorous analysis that resource conditions result solely from dog use of the sites, discounting the contribution from other visitors and recreational users. The Draft Plan/DEIS does not address the contribution of other impactful activities, including special events, to the resource conditions and existing impacts at each of the GGNRA sites. The level of site use from a single special event is likely equivalent to the level of regular use that occurs over weeks, months or longer. These special events include the annual Fleet Week at Crissy Field and the future impact of America's Cup on GGNRA lands.

*Recommendation. To address this deficiency, the GGNRA should study the contribution that all visitors make to existing resource conditions and potential impacts. This information is obtainable and essential to a reasoned choice among alternatives. The preferred alternative should then be re-evaluated and modified to address only the issues that specifically result from dog use at each of the sites. The NPS should then pursue a comprehensive approach to managing all these uses to the benefit of the full ranges of GGNRA resources and values.

2. Insufficient Information Needed to Draw Logical Conclusions and

Evaluate Alternatives

In many places, the Draft Plan/DEIS does not provide any data on actual impacts by dogs in areas being proposed for new dog walking restrictions. In places where data are provided, the Draft Plan/DEIS makes undocumented assumptions that there are unacceptable impacts and that dogs are the culprits. For example, in the Western snowy plover sections of Chapters 3 and 4, the Draft Plan/DEIS explains that people, as well as dogs, who traverse dune areas disturb shorebirds. Monitoring surveys observed 48 off-leash dogs chasing birds over a period of 12 years. However, in this case the birds continue to return to the area each year. Therefore, there might or might not be a problem 'the Draft Plan/DEIS does not provide substantive data to help the reader decide. If there is a problem, the Draft Plan/DEIS doesn't provide logical conclusions as to whether access should be limited for people, for dogs, or both.

The Draft Plan/DEIS is, in some respects, comprised of about 20 plans and EISs, because it examines each GGNRA unit. We can appreciate how difficult this is for GGNRA and the NPS to accomplish. But NEPA guidance and case law have consistently explained that difficulty does not excuse lack of adequate data and study in an EIS. And the bulk or size of an EIS does not equate to its adequacy. In many places, as described in more detail below, the Draft Plan/DEIS lack any description of actual site specific impacts on which decisions on dog-walking restrictions are being proposed. In other places, the Draft Plan/DEIS assumes species are present in areas where there is no record of their presence. In other places, there is inconsistent information about the presence of species.

Unclear enforcement data

Many of the findings in the Draft Plan/DEIS are founded on a reference included in the document as Appendix G, "Law Enforcement Data" (NPS 2008c). This reference document is critically deficient in substantiating statements made in the characterization of existing conditions and in the analysis of the environmental consequences. Per NEPA, "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements (CFR 1502.24)." Additional detail on this issue can be found in Appendix C.

*Recommendation. The Draft Plan/DEIS should be revised to provide clear evidence in the record to support all of its findings. The NPS needs to ensure the professional integrity, including scientific integrity, of the analysis and findings contained within its Draft Plan/DEIS. Detailed recommendations on how to revise the enforcement data in the Draft Plan/DEIS, and the ensuing impacts and alternatives analysis, are listed in Appendix B.

Lack of and inconsistent site-specific, scientific data on baseline conditions

The Draft Plan/DEIS does not address site-specific resources and the condition/health of those resources. This lack of information results in a vague baseline against which to assess the magnitude of impacts associated with implementing the proposed action and alternatives. With such a vague baseline, it's also difficult to assess the need to change existing dog management strategies.

Select examples:

- a. The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but no data are provided as to where/if they are actually present.
- b. While some special-status species descriptions suggest a nexus between dog activity and the species and/or their habitat (tidewater goby, California red-legged frog), other species descriptions do not (San Francisco garter snake, Coho salmon), and there is a consistent lack of detail describing the existing interaction, if any, between the species and dog activity.
- c. There are inconsistencies regarding the presence of species in the text and in Table 8 in the Special-Status Species affected environment, the information in Appendix H, and the impact analyses in Chapter 4.
- d. In Table 8 on page 246, the GGNRA Location column contains the location for plants that do not exist there according to the text.
- e. For a number of the analyses of Alternatives B-E, the Draft Plan/DEIS states that the area of impact is currently undisturbed. This is not the case, as dogs and humans are currently allowed in those areas.
- f. Additional examples are provided in "Soils and Geology," "Water Quality," and "Biology."

*Recommendation. To address this deficiency, the Draft Plan/DEIS should provide site-by-site assessments of the conditions of the GGNRA resources and values at each of the 21 sites. The selected preferred alternative for each site should then be re-assessed and modified to address only those site-specific issues and to employ adaptive management (proposed adaptive management techniques are provided at the end of this letter) to ensure the goal of protecting those resources and values is achieved.

Reliance on undocumented assumptions

The Draft Plan/DEIS assumes, but fails to demonstrate, the "cause and

effect" relationships without site-specific supporting information. For instance, the Draft Plan/DEIS assumes but does not demonstrate that where dogs are present within GGNRA sites, there is a disturbance of natural resources. The Draft Plan/DEIS also assumes but does not demonstrate that the disturbance of resources is attributable to dogs (versus other factors). These assumptions result in flawed conclusions that the mere presence of dogs is equivalent to adverse resource impacts. The findings of an EIS must be based on scientific accuracy and clear evidence in the record. This Draft Plan/DEIS is significantly flawed in that it does not rely on adequate evidence for the conclusions it draws, and in that it fails to clarify its methodology for drawing those conclusions.

Select examples:

- a. The text from Chapter 3 provides data on the western snowy plover, but beyond providing numbers of observations, the Draft Plan/DEIS does not provide evidence that dogs chasing the birds are likely to impact the survival of the species taking all relevant factors into account (see paragraph 1, page 799).
- b. The Draft Plan/DEIS presents no information supporting the finding that dogs are currently impacting shorebirds and marine mammals. Therefore, there is no scientific rationale for prohibiting dogs from beach areas under Alternative D to "protect shorebirds and stranded marine mammals," as stated on page 151.
- c. The Soils and Geology section (page 225) includes the following statements: "Dogs and dog walkers that do not stay on designated trails and venture off trail create social trails that become denuded of vegetation and result in increased soil compaction." and "Soil compaction is common along social trails that have been created by ' and are heavily used by ' bikers, hikers, runners, and dog walkers." The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. At about 200 pounds per adult, the force that a human exerts on the soil one foot at a time would have a significantly greater impact on soil compaction in a picnic area than the force exerted by even a large 70- pound dog distributing its weight on four paws. The failure to acknowledge that human use has more impact on soils and geology in this regard, compared to dog use, uncritically loads the analysis in favor of restrictions on dogs. While there may be areas in which impacts from dogs are unacceptable, the same criterion holds for impacts from humans, and in most of these areas, dogs and humans are already excluded.
- d. The Soils and Geology section (page 112) on Homestead Valley

concludes that, under the No Action Alternative, there would be long-term adverse impacts from "soil compaction, erosion, and nutrient addition...", in areas off the trail since dogs would be under voice control," while under other alternatives it is concluded that the impacts would be negligible because dogs would be under physical restraint. This is an unsubstantiated assumption in support of the underlying bias of the analysis. The analysis does not attempt to connect intensity of use and impact and seems to be based solely on the incorrect assumption that humans and wildlife would have no impact on off-trail areas, and that all impacts can be attributed to dogs.

Recommendation To address this deficiency, the NPS should re-evaluate untested, assumed linkages and re-define the existing and potential impacts that specifically result from dog use at each of the GGNRA sites. The preferred alternative for each site should then be re-assessed and modified to address only those site-specific impacts and issues.

Flawed evaluation of No Action alternative

The impacts of the No Action alternative are substantially overstated because the Draft Plan/DEIS determines individual areas of compliance with existing dog management strategies without sufficient supporting data and assumes that noncompliance results in adverse impacts. This unsupported logic both overstates the degree of additional management required to address the resource issues, but also misrepresents the relative impacts of the four action alternatives; for example, the public is assumed to comply with management strategies under an action alternative, whereas the public is found to be noncompliant with those same management strategies under the No Action alternative.

Select examples:

a. For many sites, including Stinson Beach, Crissy Field, Baker Beach and Bluffs, Mori Point, Oakwood Valley, and Muir Beach, analysis of Alternative A acknowledges noncompliance, while the other alternatives assume full compliance with dog restrictions. In some cases, the management strategy is the same, with the only difference between Alternative A and the preferred alternative being the assumption of compliance.

b. On page 109 (Table 5, Stinson Beach, Soils and Geology) under Alternative A, the second bullet identifies long-term, minor, adverse impacts in areas outside parking lots and picnic areas. These impacts are not repeated under the other alternatives despite the fact that, except for Alternative D, the management strategies under all of the alternatives are identical for Stinson Beach. Each of the statements in the first bullet, except

for Alternative A, No Action, includes the clause "assuming compliance." At least for the soils and geology evaluation, the analysis seems to take it for granted that the No Action Alternative is inferior. Both of these are examples of biasing the analysis against No Action.

c. On pages 1147-1158, mission blue butterfly, Fort Baker and Milagra Ridge ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) and the preferred alternative assumes compliance (negligible to minor, adverse impacts, with habitat restoration programs). d. On pages 1219-1240, San Francisco garter snake, Mori Point, Milagra Ridge, Cattle Hill, Pedro Point ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). The text states (page 1230) that there is no documentation. that the current level of compliance with on-leash laws (No Action Alternative) is impacting this species. e. In the Water Quality section, the impact analysis for Alternatives B through E assumes compliance with the management strategies. However, the impact analysis for Alternative A does not make this same assumption.

*Recommendation. To address this deficiency, the NPS should re-evaluate unsupported assumptions and the analysis of the No Action alternative to ensure the methodology used for it is consistent with the methodology used for the action alternatives. The No Action alternative is a continuation of the current GGNRA management plan and policies ' not a continuation of existing conditions. The current plan and supporting documents include policies for good public information and education on GGNRA resources and partnerships with the community. The No Action alternative can and should include improved education and compliance measures (including accurate signage about voice control areas) to implement these current plan policies (which are also policies in the proposed GGNRA updated general management plan), including dog owner training, to raise the level of compliance.

Resultant flawed alternatives analysis

As described above in this section, the Draft Plan/DEIS assumes but does not provide the required rigorous analysis to enable the reader to draw logical conclusions about impacts and alternatives. The Draft Plan/DEIS does not provide adequate information on which to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of resources" (as required by NEPA Section 102(2)(E); 40 CFR "1501.2 and 1502.1 and corresponding DOI and NPS implementing guidance), or to allow meaningful evaluation on the alternatives including reasonable mitigation measures, as required by NEPA (e.g., 40 CFR "1502.14(b)and

1508.25(b) and corresponding DOI and NPS implementing guidance). This issue in the Draft Plan/DEIS results in a bias in the evaluation of alternatives, contrary to NEPA's requirement that "Environmental Impact Statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made" (40 CFR '1502.2(g)).

Select examples: a. The impacts of the No Action Alternative are substantially overstated because the Draft Plan/DEIS assumes that noncompliance results in adverse impacts. This both overstates the degree of management required to address the resource issues, but also misrepresents the relative impacts of the four action alternatives; for example, the public is assumed to comply with management strategies under an action alternative, whereas the public is found to be noncompliant with those same management strategies under the No Action Alternative.

b. On page 1264, bank swallow as with the western snowy plover, current impacts are considered minor to moderate based on occasional to frequent perceptible disturbances to the species from dogs; however, the description of Alternative A mentions only that dogs have been seen in the bluff area. There is no apparent nexus between dog activity and actual impact to bank swallows ' is the presence of a dog in the bluff area assumed to disturb the colony? Have the birds been observed flushing from nests, or have crushed burrows been found? The language here suggests these impacts are possible, but that they haven't actually occurred.

c. In Chapter 2, starting on page 99, the discussion of the environmentally preferable alternative should be revised to reflect the value of recreational resources. Because the draft EIS does not recognize recreational resources as an environmental resource, the analysis of the environmentally preferable alternative is flawed. It fails to consider the range of resources afforded by the GGNRA that could be affected by the action alternatives. Recreation is called out in the GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognizes that the achievement of these outstanding values is not mutually exclusive.

*Recommendation. To address this deficiency, the NPS should re-evaluate unsupported assumptions and the analysis of the alternatives to ensure the methodology used for it is consistent and based on site specific scientific data. And, since protection of the environment includes protection of established recreational opportunities and facilities on GGNRA lands and nearby parklands, the draft EIS should consider such resources as part of its selection of the environmentally preferable alternative. Under NEPA, the environmentally preferable alternative is one that would employ environmental design and adaptive management techniques to preserve all

of the outstanding values of the GGNRA.

3. Improper Treatment of New Lands

The proposed action to close new lands to dog walking access conflicts with the GGNRA Enabling Legislation (PC 92-589) and with National Park Service Management Policies (2006) for determining uses and land protection plans. GGNRA is required to consider new lands in the same way that it considers uses and land protection measures on lands within GGNRA. The unprecedented "Closed until open" proposal would violate GGNRA's statutory obligation to preserve and maintain recreational uses, violate sound land planning with the community, and violate NEPA by prejudging alternatives before site-specific public and environmental review. There is no basis for treating new lands differently than existing lands under NPS regulations and policies. Furthermore, there is no such policy in the existing GGNRA General Management Plan and Compendium.

The Draft Plan/DEIS notes (p. 36), the enabling legislation states GGNRA's purpose as follows (emphasis added):

"In order to preserve for public use and enjoyment certain areas of Marin and San Francisco counties, California, possessing outstanding natural, historic, scenic, and recreational values and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area is hereby established."

The phrases "preserve for public use and enjoyment" and "maintenance of needed recreational open space" set out a high standard for management actions that would limit or restrict this fundamental value and resource of the GGNRA. The words "preserve" and "maintain" mean the continuation of uses, recognizing that uses may be regulated to protect the other fundamental values of the GGNRA.

NPS management policies expressly reflect this emphasis on continuing uses, measured by the yardstick of the unit's enabling legislation. Section 1.4.3.1 states:

In determining whether or how to allow the use, park managers must consider the congressional or presidential interest, as expressed in the enabling legislation or proclamation, that the use or uses continue.

When new lands become part of GGNRA, the recreational uses existing at the time of acquisition should be allowed to continue unless GGNRA determines, through the public land planning and NEPA process, that unacceptable impairment would occur (as explained in Chapter 1 and

Appendix C of the Draft Plan/DEIS).

Section 3.3 of the NPS management policies make clear that protective measures are to be integrated in to the planning process -- "Planning for the protection of park lands will be integrated into the planning process for park management" -- not predetermined in advance of site specific the public planning and environmental review process.

In preparing land protection plans, Section 3.3 requires: "A thorough review of a park's authorizing statutes and complete legislative history will be conducted as part of the land protection planning process."

Section 3.3 states that land protection plans should determine what "means of protection are available to achieve the purposes for which the unit was created." As noted above, recreational use is one of the basic purposes for which GGNRA was created. Dog walking was contemplated as a traditional use in GGNRA and was plainly discussed in both the Senate and House bill reports, basic legislative history documents.

In the Introduction to land protection, the NPS management policies state (chapter 3, emphasis added):

The National Park Service will use all available authorities to protect lands and resources within units of the national park system, and the Park Service will seek to acquire nonfederal lands and interests in land that have been identified for acquisition as promptly as possible. For lands not in federal ownership, both those that have been identified for acquisition and other nonfederally owned lands within a park unit's authorized boundaries, the Service will cooperate with federal agencies; tribal, state, and local governments; nonprofit organizations; and property owners to provide appropriate protection measures.

To fulfill this obligation, GGNRA needs to cooperate with these entities, including nonprofit community groups and property owners adjoining GGNRA, to protect recreational resources. As Management Policy 1.4.3.1 directs:

Where there is strong public interest in a particular use, opportunities for civic engagement and cooperative conservation should be factored into the decision-making process.

GGNRA is aware of the strong public interest in dog walking access, and of the interest of San Francisco and Marin Counties and responsible community and nonprofit organizations in cooperative conservation. It is entirely inappropriate and contrary to these management policies to close new lands to dog walking access without first providing opportunities for

this civic engagement and for cooperative conservation efforts.

In conclusion, there is no basis in existing law or adopted policy for the NPS and the GGNRA dog management plan to summarily reject and fail to preserve and maintain an important recreational use on new lands that is allowed on existing lands, particularly in advance of sound environmental review and land use planning. This Plan and Draft Plan/DEIS do not provide this review and planning, because by definition, new lands have not yet been fully studied, acquired or subject to the level of site specific review required of this EIS.

For reasons noted above, it is inaccurate wrong to treat dog walking as the establishment of a "new use" in GGNRA, which would be the result of the proposed policy. We understand GGNRA's desire to create a presumption against continuing this use, however, there is no factual, legal, or management policy basis for this approach.

*Recommendation. The preferred alternative should be revised to make clear that new lands will be treated the same as any other GGNRA lands and follow the same NPS management policies. Recreational uses should be allowed to continue except as may be regulated through site-specific public land planning processes and associated environmental review. 4. Lack of Specificity in Proposed Action

The description of Elements Common to Action Alternatives (pages 63-67 in the Draft Plan/DEIS) describes the proposed 75% compliance standard and secondary management response, but does not provide details of the monitoring plan or other elements of an adaptive management plan on which the management response would be based. The draft Plan/Draft Plan/DEIS does not propose an adaptive management component that meets applicable guidance and that can be meaningfully reviewed, as called for in NEPA procedures and current Council for Environmental Quality (CEQ) mitigation and monitoring guidance (January 2011), including but not limited to pages 9-11 and pages 13 and 19 (on the role of the public in the design and review of results).

Select examples:

- a. The Draft Plan/Draft Plan/DEIS states (page 1725) that "the compliance-based management strategy is an important and effective tool to manage uncertainty when proposing new action" and "has been created" to assure successful implementation and long-term sustainability. However, the detailed description of this critical element has not been conveyed and is not included in the document (as noted on page 64).
- b. The Draft Plan/DEIS doesn't establish how or why a special-status species

that has been sharing habitat with dogs for decades will experience an actual, likely benefit from stricter dog management, given other factors affecting the species.

c. Where management actions that limit recreational access are proposed or under serious consideration, the Draft Plan/DEIS should also disclose whether access will be limited for people as well as dogs. The evaluation of significance under NEPA requires consideration of context and intensity. Meaningful public comment on proposed management measures is not possible without full disclosure of the impacts to all users and potential management measures. *Recommendation. To address this deficiency, the NPS should fully disclose the details of the proposed action. It should describe how it will monitor compliance and resources and values at specific sites because the management measures are specific to GGNRA sites. In addition to assessing the condition of these resources and values, monitoring should also focus on determining the contribution to those conditions from other users and factors, including other human users and natural processes. This should be implemented as part of each alternative. Only through this objective monitoring approach can the GGNRA demonstrate that it has addressed the purpose and need on which the Dog Management Plan is based. Existing or proposed management strategies should be modified based on the objective monitoring results. Although it could be appropriate to use properly measured rates of compliance as an indicator, the draft Plan and Draft Plan/DEIS does not provide adequate information about the compliance-based program. To ensure objectivity, this monitoring should be conducted by an independent qualified third party with the results discussed with interested groups and made publicly available as part of a defined and technically-sound adaptive management program. Additional recommendations on management actions that should be considered by the NPS are provided below. Concluding Comments

A final comment, we humans who live with dogs, and find our lives enriched by their company, are not by definition foes of the environment. In particular, we are dues paying members of numerous environmental organizations and also support domestic animal rights organizations. We live with our canine friends, and are strong advocates for the preservation of our natural resources, and are protective of our environment.

We argue that the preservation of the environment in the GGNRA is enhanced by those of us who visit with our dogs, not destroyed by it. The usage of the GGNRA is an integral part of our lives with our dogs, we are passionate in our protection of both.

Sincerely, Jane Woodman and Sonja Hanson for Marin Unleashed

Cc: Senator Feinstein, Senator Boxer, Congresswoman Woolsey, State

Senator Leno, Assemblyman Huffman, Marin County Supervisor Sears,
Sausalito Mayor Weiner Enclosures: Appendix A: Hybrid Alternative
Appendix B: Recreation Resources ' Suggested Annotated Outline Appendix
C: Additional Comments Related to Appendix G, "Law Enforcement Data"
Appendix D: Additional Comments Related to Draft Plan/DEIS Analysis of
Geology and Soils Appendix E: Additional Comments Related Draft
Plan/DEIS Analysis of Water Quality Appendix F: Additional Comments
Related Draft Plan/DEIS Analysis of Biological Resources Appendix A

Hybrid Alternative

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

? The GGNRA shares a border with Sausalito, Mill Valley, Muir Beach and unincorporated Marin County land including Marin City and Tam Valley. The fire roads that connect the GGNRA to these communities and the fire roads that run near the boundaries of the GGNRA with these communities should be accessible to the public walking with their dogs on-leash. ? The fire roads that lead from the neighboring communities into the GGNRA and run adjacent to them are, from Muir Beach in the north to Sausalito in the south: ? Coastal Trail from Muir Beach to Coastal Fire Road to Coyote Ridge Trail (a fire road) to Miwok Trail (a fire road). ? Miwok Trail from Highway 1 to Coyote Ridge Trail. ? Miwok Trail from Tennessee Valley Road to Coyote Ridge Trail. ? Marin Drive from Tam Valley to the Miwok Trail. ? County View Road from Tam Valley to the Miwok Trail. ? Tennessee Valley Road (or the adjacent Rhubarb Trail (Marin County trail)) to Oakwood Valley Fire Road. ? Oakwood Valley Fire Road from Tennessee Valley Road to Alta Trail (a fire road). ? Alta Trail from Donahue Avenue in Marin City to Rodeo Valley Trail. ? Pacheco Fire Road from Marin City to Alta Trail. ? Orchard Fire Road from Marin City to Alta Trail. ? Rodeo Avenue from Highway 101 to Alta Trail.

? We are requesting on-leash access to two trails because they provide access to 2 of the fire roads listed above:

? The Morning Sun Trail that was built to provide access from Sausalito to the GGNRA Headlands; it goes from the Spencer Ave bus-pad on the west side of 101 up to Alta Trail. ? The SCA trail that runs parallel to Wolfback

Ridge Road and about 20 feet below it. This trail connects Alta Trail with the fire road (this one is un-named) that goes over the 101 tunnel and then back into Sausalito (it comes out on Hecht Avenue).

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

There has been little or no discussion of on-leash access for dogs in the GGNRA, the focus of concern has been off-leash / voice control use. For those of us who hike long distances with our dogs, on-leash access is important. As the Baby Boomers age, having a dog along on-leash on a long hike is an issue of safety and ensures that we will continue to exercise. 2) Retain the 1979 Pet Policy (Alternative A) for all of Rodeo Beach, keeping both the north and south ends, for off-leash use.

? To address concerns regarding dogs interfering with other beach users, we think 'timed' use makes sense, i.e. during days and/or hours that there are many visitors to the beach, dogs should not be allowed. The NPS argues that this is too difficult to enforce. We do not understand this logic. Timed-use is in practice many places; common sense tells us it requires less, rather than more enforcement.

? Most of the year the weather at Rodeo Beach is cold and windy, and often foggy. As a result there are few visitors to Rodeo Beach other than surfers, people with their dogs, and staff and children from the Headlands Institute. May through October (when there are warm days), there are more visitors, but even then before 10 am and after 3 pm there are few visitors other than surfers and people with their dogs.

? For humans that want a no-dog experience at the beach there are many other beaches from which to choose. Between the Golden Gate Bridge and the Sonoma County line the only public beaches that currently allow off-leash dogs are Rodeo Beach and Muir Beach. Upton Beach is part of Marin County Parks and Open Space and allows dogs on-leash. There are 3 short stretches of beach at the Pt Reyes National Seashore that allow dogs on-leash. Dillon's Beach at the very northern end of the County is a private beach that allows dogs on-leash. That's it for the dogs on ocean beaches in Marin.

? Rodeo Beach (not Rodeo Lagoon) has little to no bird activity (confirmed in the Draft Plan/DEIS) as it is very steep and provides no nutrients for birds . The Marine Mammal Center (TMCC) has stated that dogs are not a threat

to stranded marine mammals: "seals and sea lions have the potential to strand anywhere in California, but this does not mean that sites cannot be set aside for dogs off-leash. Furthermore, public walking their dogs can be an important arm of the stranding response—they can notify TMMC, and help with setting up a barrier around the stranded animal, as they are likely to be among the first people to spot a stranded animal." (Frances Gulland, Director of Veterinary Science, The Marine Mammal Center)

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

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

? This stretch of Alta Trail (a fire road) is on top of the ridge and is approximately 1 mile long. On the east side of the fire road you look down onto Marin City and Highway 101. On the west side of the fire road you look down onto Tennessee Valley. ? This is the most used stretch of fire road in the GGNRA in Marin. There are dozens of humans with their dogs every day at this location. There are also hikers and bike riders, and an occasional horseback rider. The first quarter of a mile runs through private property that provides county easement into the GGNRA. ? This fire road is in use by vehicles from PG&E, MMWD, Park Conservancy volunteers, and GGNRA staff. This is not pristine wilderness, but it is much loved and used by many Marin residents. ? Our understanding is that the Mission Blue Butterfly habitat that is being planted along Alta is the main argument against dogs off-leash on Alta Trail. We have never seen a Mission Blue Butterfly along Alta Trail, but we suppose if enough Lupine is planted they may come. There are many other areas in the thousands of Headland acres that Lupine could be planted to create Mission Blue Butterfly habitat where the Mission Blues might also come. There is no evidence that the presence of dogs displaces Mission Blue Butterflies. 5) Retain the 1979 Pet Policy (Alternative A) for the section of Julian Fire Road between McCullough Road and the Historic Firing Range. This is a one mile section of fire road that runs above Fort Barry housing. This section of the road is built into the side of a steep hill with heavy scrub on either side, restricting humans and dogs to the fire road. The road is frequently used by both humans with dogs and bike riders; there is room to accommodate both.

6) Retain the 1979 Pet Policy (Alternative A) for Old Bunker Road loop. This is a wide paved fire road frequently used by hikers with and without dogs. There are a few bike riders, but not many and there is plenty of room on this road for everyone. The road circles up from the entrance to the

Marine Mammal Center, runs above Fort Cronkite, around the water tank, and Battery Townsley and then back down to Rodeo Beach.

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

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

Appendix B

Recreation Resources ' Suggested Annotated Outline

Affected Environment

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

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

changes from baseline conditions.

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

Environmental Consequences

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

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

The section should also describe and evaluate the indirect impacts of the alternatives on areas in close proximity to the GGNRA, including indirect impacts that substantially impair or diminish the features, attributes, or activities currently available to nearby parkland visitors. Although the Visitor Use and Experience analysis provides some information on indirect impacts on nearby parkland, it fails to provide a detailed evaluation of the potential for an increase in visitor use of nearby recreational facilities. Such an increase in visitor use could lead to a decrease in visitor enjoyment of those areas, an increase in enforcement issues, and/or other related environmental effects. In addition, the Visitor Use and Experience analysis

related to indirect effects on nearby parklands fails to provide a reasoned explanation for its conclusions. For example, on page 1412, the draft EIS states that the impacts on nearby parks under Alternative D, which prohibits dogs in the parking and picnic areas at Stinson Beach are negligible and "minor." Given that dogs would no longer be allowed in these areas under this alternative, it is unclear how the EIS authors determined this impact to be negligible and "minor" without a rational explanation for this conclusion. Not allowing dogs in areas where dogs were they were allowed previously would indeed affect the use of adjacent recreation areas and the EIS needs to disclose this impact. Thus, the recreation resources section of the draft EIS should consider impacts related to the loss of recreational opportunities and access to nearby recreational facilities with detailed explanations for all conclusions.

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

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

Appendix C Additional Comments Related to Appendix G, "Law Enforcement Data" Many of the findings in the Draft Plan/DEIS are founded on a reference included in the document as Appendix G, "Law Enforcement Data" (NPS 2008c). This reference document is critically deficient in substantiating statements made in the characterization of existing conditions and in the analysis of the environmental consequences. Per NEPA, "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements (CFR 1502.24)." The findings of an EIS must be based on scientific accuracy and clear evidence in the record. This Draft Plan/DEIS is

significantly flawed in that it does not rely on adequate evidence for the conclusions it draws, and in that it fails to clarify its methodology for drawing those conclusions. The Appendix G reference document consists of a two-page summary of the numbers of incidents for two years (2007 and 2008), organized by incident type and location. The document does not provide rationale for why it chose those two years as being representative of existing conditions. The reference document is lacking in terms of only providing a very limited number of years of data. Moreover, it is inadequate in that it only contains numbers. Thus, Appendix G fails to provide any details or context for the incidents; nor does it contain any source documentation or records of communication. For example, the table shows how many "leash-law" violations occurred in a given area of the park per year, but does not provide the context of specifically where the incidents occurred, or provide context in terms of how many visitors visit the park, or otherwise provide a method to assess the significance of the number of incidents. In the instance of "bite/attack" or "disturbing wildlife" incidents, no details regarding the nature of the incident, its severity, or where it occurred are provided. Any material incorporated by reference into an EIS should not only be cited but also summarized. The Draft Plan/DEIS fails to summarize the data provided in Appendix G, nor does it attempt to clarify the methodology for how it drew its conclusions based on the data presented. Appendix G also noted that the violations recorded for the incidents of concern (i.e. bite/attack, closed area, disturbing wildlife, and hazardous condition/pet rescue violation types) appear very low, especially in consideration of the assumed large number (estimates of this should be provided in the Draft Plan/DEIS) of dog-walking visitors that visit the park each year. Given the relatively low numbers of serious violations recorded, it is difficult to understand how the NPS can support its findings that major dog conflicts exist in the GGNRA. NEPA further requires that, "When an agency is evaluating reasonably foreseeable significant adverse effects on the human environment in an environmental impact statement and there is incomplete or unavailable information, the agency shall always make clear that such information is lacking (CFR 1502.22)." When information is incomplete or unavailable, the agency must obtain the information, unless the cost to obtain the information is unreasonable. In that case, the EIS must state that the information is incomplete or unavailable and identify the relevance of the unavailable information to the evaluation. The Draft Plan/DEIS does not acknowledge the incompleteness of the data provided, or in any way factor in the limits of the available data to the findings made. Appendix G is used as the basis for numerous claims throughout the document, as well as to support findings of adverse impacts. Appendix G is referenced 48 times in the document, in Chapters 1, 3, and 4. Resources topics relying on Appendix G for findings of issues with existing conditions and/or adverse impacts in the environmental consequences section include Visitor Use & Experience, Health & Safety, Park Operations, Special Status Species, Wildlife, and Vegetation. In the following paragraphs are some

examples of how this source document is misused, and as a result, the document's findings are flawed.

Correspondence ID: 4627 **Project:** 11759 **Document:** 38106

Received: Jun,10,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

My name is Stella Malone and I'm 8 years old. I live at 8 Cragmont Avenue in San Francisco.

My parents and I just LOVE to go down Crissy Field and Fort Funston a lot. I always go there with my two dogs.

We love to take them off leash and watch them run catch balls and play in the water.

What if you were a dog and there was a law that you couldnt go off leash? How would you feel?

Please do not change the rules!

From: Stella Malone

Correspondence ID: 4628 **Project:** 11759 **Document:** 38106

Received: May,13,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

I have been walking dogs as a professional dog walker at Crissy Field since 1990. I believe I was the first and only dog walker to receive a permit from the GGNRA in 1995-1996 and 1996-1997 (see attached).

In my many years at Crissy Field, I have treated and cared for the park as I would my own backyard. I filled all the bag dispensers daily for seven years. For several years I purchased plastic bags myself to fill the dog containers because I believe that dog owners may be lazy about bringing bags but are responsible enough to pick up after their dogs if bags are available. This has proved to be true. Crissy is remarkably clean for the number of dogs who use the park daily.

I have picked up hundreds of pounds of trash and every dog poop I see even

if my dogs did not leave them, filled in countless holes on the beach dug by both dogs and humans. I have tried to ensure that my dogs and I are examples of good behavior.

I have lobbied my fellow dogs owners for responsible dog behavior as a member and an officer of the Crissy Field Dog Group. In that capacity, I met on numerous occasions with Superintendent Brian O'Neill about dog management. On a daily basis I inform people about the rules for the Wildlife Protection Area. I do not ever see rangers providing this necessary education and I feel I contribute as a professional where you do not have the personnel to do so.

Though professional dog walkers are often vilified, most walkers I know at Crissy Field keep excellent control of their packs, clean up more trash and poop than their dogs create, keep their dogs leashed on the path and in the parking lots, and work to avoid groups of children, picnickers and the elderly until their dogs are in a safe, clear area. Dog walkers provide necessary services such as cleanup and education, for free, that the Park Service cannot afford to provide.

Permitting As a professional for over 20 years, I am bonded and insured and am very experienced at my job. I do not believe that I should be required to take a beginner course at the cost of \$675 over the course of 12 weeks to receive a permit. I urge you to amend that rule for longtime professionals. At the very least, require those of us with many years in the business to take a short review course from accredited training groups. Otherwise, you penalize those of us most experienced and committed to our profession and risk replacing us with newer entrees to dog walking.

I believe it is important for professional walkers to have permits and I hope that the cost of the permit will be reasonable. As a solo operation, would like to dispel the notion, heard from various rangers, that professional dog walkers have high income and can afford high permit fees. I do not take large numbers of dogs on my walks, and do not make a lot of money. Please take the small businesses into account when determining your fees otherwise, as stated above, the larger businesses with the less experienced personnel will take over.

I am well known at Crissy Field from my long tenure walking in the park and my contributions to upkeep and education. I ask that you acknowledge the importance of good professionals as an asset to off leash dog walking in the GGNRA.

Thank you. Sally Cancelmo

3 attachments

Correspondence ID: 4629 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead, it relies on speculations, exaggerations, and misleading statements. It reaches conclusions that are not supported by either the science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not a pristine wilderness areas like Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded.

This plan disregards the health and well-being of people, dogs, and the community. It arbitrarily excludes the Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of healthy dog and human recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation.

? Provide for extensive off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County.

? Exclude speculative, exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g., equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.).

? Enable professional dog walking and align any professional dog walking rules with county or city regulations.

? Eliminate "compliance-based management," which will allow additional restrictions to be implemented without any public Input.

Respectfully, Michael S. Caine

Correspondence ID: 4630 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean :

This letter is to provide written comment to the GGNRA DEIS. I am a long time San Francisco resident and live in the Presidio Heights neighborhood of San Francisco. I live in a condominium with my dog. As we have no backyard, the Presidio and the GGNRA parklands are our backyard. Professionally I work in the renewable energy field and personally I contribute my time and financial resources to causes that support the environment, wildlife and the human animal bond. My dog has her Good Canine Citizenship certification and she is an animal assisted therapy dog with the SF/SPCA and Delta Society programs and visits people in the local hospitals and nursing homes. She and I do our best to contribute to the community and to make the beaches and GGNRA lands a better, safer, cleaner and happy place for all visitors. Unfortunately, we now find that the GGNRA is about to take away our primary source of recreation, solitude, urban escape and joy.

I do not agree with the GGNRA's current preferred alternatives as they significantly restrict and eliminate off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science, the appropriate considerations for an urban recreation area or long-term monitoring of site-specific conditions.

Amazingly, there are major areas of impact that the DEIS is required to study that it did not. The law is clear that the DEIS must look at impacts to not only the natural environment, but also to the human environment (health and community), and the urban environment (the surrounding areas). These studies are conspicuously absent from the DEIS making it a grossly biased document and, by default, its recommendations of Preferred Alternatives are highly flawed.

I walk my dog several times a week at Fort Funston, Baker Beach and Crissy Field. Simple observation gleaned over several hundred walks over the past 15 years suggests a few conclusions that are inconsistent with the DEIS. First, the vast majority of dogs and people walking dogs stay on the

designated areas and, when on the beach, stay close to the water's edge. ? Second, dogs and the people with the dogs make these areas safer and friendlier. I have personally not seen any serious incidents between dogs or dogs and people. I feel safer when walking deserted beaches and trails with a dog by side and with other dogs and their guardians also on the trails. ? Third, people with and without dogs benefit from the joy and fun and socializing that the dogs bring to the park. Walking your dog is a highly social and healthy activity. ' Fourth, dog owners are deeply committed to the natural environment. They observe the signs (unlike families and children), leave the beach and grass areas cleaner than when they arrived, and sponsor periodic beach and park cleanup activities. ' Fifth, these park lands, Crissy Field in particular, have only gotten better in the last so years despite the increase in local and tourist use, including dog related activity. ? Sixth, people with dogs, without dogs, on bikes, in red flyer wagons, on scooters, in wheelchairs, hang gliders, surfers, wind sailers, and electronic airplane enthusiasts (despite the intense noise pollution they introduce to the quiet of the beaches and dunes), etc..., all enjoy the diversity of each other's company and participation of activities in the GGNRA. And they do so peacefully and with a sense of community and appreciation for our amazing shared natural resource.

Why did I not see any of this in your DEIS ? Why did I not see any mention of the toll that the beaches and dunes take on event days such as Fleet Week or the various marathons and walk-a-thons that bring thousands of people to the beaches? There is also the everyday disregard of the signs and postings by families and hikers. I make note of this because the dog guardians, after being under assault from the GGNRA for the past zo years, and due to the educational efforts of the organized dog walking groups such as Crissy Field Dog Group and Fort Funston Dog Walking Group, are particularly respectful of the signs and regulations. The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to substantiate these claims and support the suggested restrictions of the preferred alternatives. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors. I call your attention to the attached exhibit. These families, children, hikers, kite flyers, football throwers are all treading where the signs say not to tread or have crossed fences to reach off-limits areas. After years of dog walking, on and off leash, n the GGNRA I can confidently say that dogs are really not causing the problems that the DEIS attributes to them. The DEIS is highly biased and blames dogs for problems that are either caused by general park use or overall natural trends. For example, there is no hard evidence offered that dogs create a singular burden on the park resources and habitats. The 36 threatened and endangered species that exist within the park system are not endangered by conditions here, specifically by dogs in

the GGNRA as the report would have you believe, but rather by their population numbers worldwide. In fact, the small number of sites currently open to recreation with dogs (as defined by the 1979 Pet Policy) include no critical habitats or nesting areas for either the Snowy Plover or bank swallow. It is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands and existing lands. While I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, I believe options besides restricting dog-walking access should be considered. I favor an approach that balances recreational use (including dog-walking access) with preservation. I think that a multi-faceted approach that incorporates education/improved signage and physical/vegetative barriers is preferable to restriction as a first choice. It is imperative that the DEIS include such an alternative as a reasonable option.

The proposed "compliance-based" approach is of particular concern and is set up to fail. It cannot be a part of the plan. It punishes many for the perceived transgressions of a few, even if the transgressions might be due to lack of GGNRA educational efforts or signage. It is a set up for failure and should be modified to create a baseline of current conditions and then measure impacts vs. compliance. The GGNRA should partner with the community to make the plan work, not assume an adversarial relationship with failure the goal.

The DEIS fails to consider that the GGNRA is the front/back yard for a large metropolitan area. The Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment. The fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) for residents of the Bay Area. NEPA requires evaluation of impacts on the "human environment", but the DEIS fails to do so by failing to adequately address how the proposal affects "recreational" values for these local residents. A healthy community exercises and socializes together in its parks and open spaces. Cutting off access for a very large group of people and restricting comingling of diverse groups is not only discriminatory but it also represents a giant step backwards and is highly inconsistent with the values and culture of the Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so. After careful consideration and review of the many alternatives, I support a modified Alternative A (the "No Action alternative") and would also include the "New Lands" areas in San Mateo County. The current plan should be modified to provide clearer rules, more signage, improved vegetative

barriers, and education and outreach as part of the overall program. As part of a modified No Action Alternative I do support the proposal for leash requirements in all parking areas. This will enhance safety in these often highly trafficked areas.

The DEIS is biased against and does not take a hard look at the No Action Alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent and most often NOT related to dogs but to wind surfers or gliders or organized events. In addition, the DEIS does not provide site-specific information or conclusive evidence that these areas are inappropriate for continued dog walking. As such, the Existing Alternatives ' Alternative A should be slightly modified to provide for safety and access, adopted and monitored and enforced with community input and cooperation.

Respectfully, Kathryn E. Coffey San Francisco, CA 94118 CC:
Representative Nancy Pelosi, 8th Congressional District of California,
House Minority Leader, U.S. House of Representatives Ken Salazar,
Secretary of Interior Jon Jarvis, National Park Service Director Crissy Field
Dog Group

Correspondence ID: 4631 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

I am a person from the country of Myanmar and I have moved to the US to study at San Francisco State University as a scientist I study birds. I go to Chrissy Field, Tomales bay and Fort Cronkhite to look at the seabirds and other birds. There are dogs there that scare the birds by running after them. I am also nervous at these places because I am also afraid of dogs. We do not have many dogs in my country and they frighten me. I hope you will protect the birds. Thank you Mr. Dean

Hazel Thwin

Correspondence ID: 4632 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: In Chapter 1, background information and a preliminary discussion of in the current dog issues is provided. In this section, the document indirectly

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

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

On pages 229-230, the document states, "In addition to vegetation and wildlife management activities, the park collects data regarding the frequency of disturbance to wildlife and habitats at GGNRA sites. Wildlife species and their habitats are currently being affected by dogs at this park, which has been documented by reports taken and warnings and citations issued (all referenced to as incidents) related to dogs in closed areas and disturbing wildlife at GGNRA (appendix G)." The conclusion that wildlife and habitats are "currently being affected by dogs at this park" cannot soundly be based on the numbers provided in Appendix G. Appendix G does not provide evidence of what type of disturbances have occurred, or the level of significance that the documented disturbance actually has. Again, a methodology for how the document drew its conclusions based on the data presented must be presented.

On page 242, the document states, "Off-leash dogs have frequently been

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

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

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

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

On page 496, the Draft Plan/DEIS states, "Dogs are currently prohibited in the tidal marsh at Crissy Field. Despite protection of restored tidal marshes by installed fences, dogs under voice control have been documented as gaining access to the tidal marsh through the tidal inlet that allows exchange of water between the tidal marsh and San Francisco Bay (Appendix G)." Appendix G provides no documentation of dogs in this specific area. Source documentation, containing details of incidents, must be provided to support such claims. Further, the discussion continues to imply that incident of dogs going into this area is a significant issue, and this is further unsubstantiated.

The document needs to include appropriate analysis of the data to determine that a dog going into this area is a regular enough occurrence that it is determined to be a substantial issue. This consideration of the data has not been provided, and as such, the analysis is subjective, and the conclusions unfounded.

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

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

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

? Provide details for incidents in Appendix G (specific location, nature of incident) and source data. ? Where the first reference to Appendix G is made, the document should not only reference but also summarize the data

contained therein. ? Clarify why 2007/2008 years were chosen. ? Provide data for a broader range of years. ? Provide methodology for interpreting/determining the significance of the data. The NPS should provide thresholds for analyzing the incident date, by type, and by GGNRA site. The NPS should clarify what number of incidents is considered acceptable or unacceptable, again, by site and by incident type. The NPS should describe their rationale for determining proposed thresholds (i.e. in context of number of visitors per year to each site). By providing a methodology for analyzing the data shown, the EIS will be able to properly describe the significance of the data, and use the data to support (or not support) its findings. ? Provide clear evidence in the record to support all of its findings. The NPS needs to ensure the professional integrity, including scientific integrity, of the analysis and findings contained within its Draft Plan/DEIS. ? Review all instances where Appendix G is referenced in the Draft Plan/DEIS and make revisions to ensure the findings are based on clear evidence in the record. Revisions to the methodology, the analysis, and the findings, as noted above, should be to be corrected throughout the entire document, wherever such analysis or conclusions relies on the data in Appendix G. ? The NPS should take all reasonable steps to obtain and disclose the information that the Draft Plan/DEIS is currently lacking. Where there is incomplete or unavailable information, the Draft Plan/DEIS must clarify that the data is lacking, and identify the relevance of the unavailable information to the evaluation, and especially to the analysis of environmental consequences. ? As a result of the revisions to the analysis and findings noted above, the analysis of the alternatives needs to be reassessed where proposed alternatives are not substantiated by clear evidence in the record. Proposed management measure such as closures or significant reductions in access to people with dogs in areas of the GGNRA should be revised. As currently written, the data provided in Appendix G do not support the management measures proposed in the document, and therefore the alternatives need to be modified. Appendix D

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

Chapter 3: Affected Environment

General:

Table ES-1 lists only areas open to dogs under Alternative A. Although this may simplify the comparison among alternatives (since the closed areas would remain closed under all of the alternatives), it does not clearly portray the existing extent of areas closed to dogs. Not only do the alternatives variously restrict dogs compared to the No Action Alternative, but they also increase restrictions on dogs relative to a baseline that is already restrictive. The Draft Plan/DEIS and Table ES-1 should compare the alternatives in

terms of the area and miles of trails available to dogs under each alternative. This is a less subjective way of presenting the alternatives, and it could be useful in evaluating cumulative and synergistic effects. For example, Alternative C takes other available dog use areas within each county into account, presumably in recognition of the high demand for areas where people can take their dogs, and the desire to avoid over-concentrating dog use in any one area. Presenting the alternatives in terms of available area and trail miles would better allow the reader to appreciate the future impacts relative to current conditions.

Executive Summary, Environmental Consequences, pages xv-xxiii:

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

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

Page 109 (Stinson Beach, Soils and Geology). Under Alternative A the second bullet identifies long-term, minor, adverse impacts in areas outside parking lots and picnic areas. These impacts are not repeated under the other alternatives despite the fact that, except for Alternative D, the management strategies under all of the alternatives are identical for Stinson Beach. Furthermore, each of the statements in the first bullet, except for No Action, includes the clause "assuming compliance," conveying the understanding that perhaps compliance can't be assumed under No Action. At least for the soils and geology evaluation, the analysis seems to take it for granted that the No Action Alternative is inferior. Both of these are examples of biasing the analysis against No Action.

In the same table, under Alternative D, in the rationale for a finding of "no impacts," it is concluded that because no dogs would be allowed within the parking lot and picnic area, no soil would be disturbed. This interpretation fails to take into account soil disturbance caused by people using the site, regardless of whether dogs are present. (Continuing this reasoning, and referring to Maps 2A and 2D, the reader might be lead to the conclusion that the impact would be greater under No Action than under Alternative D because dogs would be allowed in the blue-shaded area of Map 2A, whereas

there is no blue-shaded area in Map 2D, when in fact the difference in effects on soils between these alternatives may be so miniscule as to be unnoticeable compared to the impacts of human use regardless of the presence of dogs). The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. At about 200 pounds per adult, the force that a human exerts on the soil one foot at a time would have a significantly greater impact on compacting the soil in a picnic area than the force exerted by even a large 70-pound dog distributing its weight on four paws. The failure to acknowledge that human use has more impact on soils and geology in this regard (and acceptable in many areas of a National Park), compared to dog use, unfairly and uncritically biases the analysis in favor of restrictions on dogs. While there may be areas in which impacts from dogs are unacceptable, the same criterion holds for impacts from humans, and in most of these areas, dogs and humans are already excluded. The Draft Plan/DEIS should attempt to provide illumination, rather than justification for a foregone conclusion.

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

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

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

Page 115 (Alta Trail, Orchard Fire Road and Pacheco Fire Road, Soils and Geology). The same sort of bias exhibited in the analysis of Homestead

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

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

General Comments

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

This Draft Plan/DEIS is about making a change to rules about dog use. Therefore, in order to be useful in this regard, the Affected Environment discussion must present information about how the environment has been impacted by dogs, and not just by dogs but also by humans. The Draft Plan/DEIS does not present baseline conditions that require a change in the rules. The Affected Environment discussion is silent. Perhaps an aerial

photo of the bluffs at Fort Funston and the adjacent areas would help to provide perspective and tie in the discussion of plate tectonics and landforms. An aerial photo would indicate that these bluffs are undergoing slope failure and rapid erosion on a very large scale, such that the localized contribution from humans and dogs is insignificant. The impacts on geology should be presented fairly and impartially, with an eye toward using the information provided in the Affected Environment section as the foundation for the impact analysis and alternatives comparison. As it is written, the Affected Environment is little more than a catalogue of the soil complexes of Coastal California, which the reader can obtain from the Internet or from browsing through Roadside Geology.

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

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

3. The discussion of soils is especially generalized in the Affected Environment section. However, it suggests that within some of the sites there are specific areas underlain by fragile or vulnerable soils that could be impacted by uses, including dogs. In order to be useful, maps are needed that would indicate the areas of these vulnerable soils, as well as the areas with steep slopes that are prone to accelerated erosion. This information

would also help to support the discussion of vegetation and perhaps other sections of the Draft Plan/DEIS. The soils maps should indicate the trails. If possible, areas of existing impacts should be portrayed. Maps would not only give the reader the ability to locate the vulnerable areas relative to use areas, but also to understand the size of these areas relative to the size of the areas where change in management is proposed. Areas of serpentine soils should be specifically shown on the maps, because they are called out in the text.

4. Rare Soils at Golden Gate National Recreation Areas, paragraph 2, page 225. The text indicates that serpentine soils can be found at certain locations that are listed. This suggests that these are the only locations where serpentine soils are found, and that should be clarified. The locations listed are Muir Beach, Crissy Field, Baker Beach, and Lands End. Showing these areas on a map would be helpful. In addition, it would be helpful to elaborate on which current dog use areas are specifically affected and why. At Muir Beach, for example, the serpentine soils are outside the study area. The Draft Plan/DEIS should discuss serpentine soils at Muir Beach and other sites only if the information is directly relevant to the study area and the impact analysis.

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

At Baker Beach, the text says that serpentine soils are located on the coastal bluffs between Baker Beach and the Golden Gate Bridge. Looking at Map 12-A, it appears that this might be the area containing the trail to Battery Crosby. Under the preferred alternative (Alternative D), this trail would be closed to dogs. Presumably the closure to dogs is related to the environment supported by these soils. The Draft Plan/DEIS should provide some discussion of the nature of the actual impacts associated with dog use that may have occurred in this area. In the Impacts discussion (p. 376-377) there is no mention of any existing impacts by dogs, and the proposed closure seems to be to prevent future impacts rather than to correct existing ones. Given the mention of these soils in the Affected Environment section, it

would be helpful to clarify this. Furthermore, the title of the reference cited, Recovery Plan for Coastal Plants of the Northern San Francisco Peninsula (USFWS 2003), suggests that some evaluation of this area may have been done prior to that time, which could be described in the Affected Environment section.

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

5. Alteration of Park Soils (page 225)

The second paragraph makes the assertion that:

"Dogs and dog walkers that do not stay on designated trails and venture off trail create social trails that become denuded of vegetation and result in increased soil compaction. This has occurred at Homestead Valley, Alta Trail/Orchard and Pacheco fire roads, Oakwood Valley, Marin Headlands, Baker Beach, Lands End, Fort Funston, Mori Point, Sweeney Ridge/Cattle Hill, and Pedro Point Headlands." This is an important assertion and is presumably supported by observation. Yet no citations to report more specific information than the list of sites are presented. The area included within the areas mentioned above is quite large, and the subject is compaction of soils. It seems possible that the threshold for inclusion on this list is that dogs or dog walkers have created a social trail within one of these sites. It would greatly assist in understanding the need for the proposed changes in dog management if more specific information were provided. Furthermore, the sentence preceding the one about dogs and dog walkers says that "Soil compaction is common along social trails that have been created by ' and are heavily used by ' bikers, hikers, runners, and dog walkers."

Based on the information presented, it is not at all obvious that the solution to the problem of social trails would be to change the rules affecting dogs. Somehow, the image of a group of dogs creating a social trail that results in soil compaction and vegetation loss seems less compelling than the image of runners, bikers, and hikers creating social trails that become visible and continue to be used by subsequent runners, bikers, and hikers. The Draft Plan/DEIS doesn't describe where dogs actually fit into this process, and

how restrictions on dogs would reduce the use of social trails by runners, bikers, and hikers. The problem is that the assertion is just an assertion. Environmental impact statements are required to be supported by evidence that agencies have made the necessary environmental analyses (40 CFR "1500.2(b) and 1502.1)

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

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

Chapter 4: Environmental Consequences. Soils and Geology, pages 291-458: General Comments 6. Study Area (page 291) The study area is defined as "the area that could be impacted by dog management activities..."

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

7. Duration of Impact (page 291)

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

8. Assessment Methodology (pages 291-292)

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

For example, on a busy weekend day, it should be possible to observe and report on the areas of intense human and dog use. It should be possible to overlay maps of soils, outcrops, slopes and slope failures, and relate those to the areas selected for evaluation of different alternatives. Some, if not all, of the areas of damage could be identified and mapped, rather than relying on broad statements about the types of impacts that are possible. These methods should be attempted, and a more sophisticated methodology designed than strict reliance on "professional judgment" that appears to be the foundation for the impact analysis. Because this information is essential

to a reasoned choice among alternatives and is obtainable without exorbitant cost, it is required to be included in the EIS (40 CFR '1502.22(a)).

9. Impact Thresholds (page 292)

The impact thresholds are critical to the outcome of the analysis, and the impact thresholds described in this section provide a great deal of leeway to the analyst. In the first paragraph, a beneficial impact is defined as "a positive change in the condition or appearance of the resource." Presumably, an adverse impact would be a negative change in condition or appearance. However, no further explanation is provided as to how appearance of soils and geologic resources should be considered. The photo of the footprints in the sand on the bluffs (page 222) at Fort Funston provides an ominous clue as to how the appearance of the resource might influence the analysis. As discussed in an earlier comment, the photo is used to illustrate the soft sandy "soils" on the bluffs, which are obviously easily eroded by hikers, dogs, rodents, and reptiles. If appearance is a threshold criterion, then more footprints, however short-lived, could easily be equated with greater adverse impact. If appearance of soils is to be used as a threshold criterion then a great deal of discipline must be exercised by the analyst to avoid any tendency to associate footprints in sand with an adverse impact on soils and geology. It would be preferable to avoid the appearance criterion altogether, and to provide a more thoughtful definition of what exactly constitutes a "change in condition" of soils (whether adverse or beneficial).

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

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

As revealed in the subsequent section (Potential Soil Impacts Common to

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

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

Soil compaction and soil erosion are distinct processes, though their causes and secondary effects may overlap. This might become clearer if each were defined. To conclude that in general, a decrease in soil erosion would be considered beneficial is far too simplistic. Under natural conditions, erosion is essential and inevitable on every surface exposed to weathering. Like wind and rain, rates of erosion can vary widely over time, as well as by material and location. For example, areas with rapid natural rates of erosion, such as the bluffs at Fort Funston, tend to support fast-growing, resilient vegetation. There are hollows and landings within the bluffs that are stable enough to support trees, but most exposed slopes fail so frequently that trees cannot become established on them. To simply assert that a decrease in erosion at Fort Funston would be a beneficial impact is not meaningful. The Impact Thresholds discussion should provide greater clarity. This level of specificity is also needed to consider, for example, why off leash dog access is prohibited even on an inland trail.

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

of the use.

10. Potential Soil Impacts Common to All Alternatives (pages 292-293) It is not entirely clear what this section is intended to accomplish, and it would be helpful if there were a brief introduction in this section to explain what it is for.

11. Cumulative Impacts to Soils that are Common to All Alternatives (pages 292-293) As with the preceding section, the purpose and direction of the cumulative impacts common to all alternatives discussion is unclear and unfocused. It does not discuss the cumulative effect of redistribution of dog use throughout the region in response to increased restrictions on dog use and changes in demographic patterns of dog ownership, which is perhaps the most important adverse cumulative effect.

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

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

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

The compliance-based management strategy discussion is part of the project description and should be fully described there. Although it is useful to reiterate the components of the strategy in the resource impacts section, the section here does not adequately focus on impacts on soils and geology. As explained in this section, the strategy would lead to increased restrictions on dog use if noncompliance exceeds threshold criteria measured by observation of noncompliance. 13. Marin County Sites ' Stinson Beach (pages 296-302) The following comments on the Impact discussion for the Stinson Beach area are generally applicable to all sites.

Alternative A: No Action (page 296).

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

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

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

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

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

"While dogs are not allowed on most of the trails, they are allowed on the Old Stage Road. This path is about .5 to .75 miles and leads to the Marin Municipal Water District Land, which allows dogs on their trails. Dogs must be leashed on both the state park and the water district lands." While this is certainly an option for some dog owners, it does not appear to provide anything at all comparable to the capacity or experience offered at Stinson

Beach, and cannot be considered a reasonable alternative to Stinson Beach for most people with dogs. Therefore, although the cumulative impact section provides some mention of other areas, it does not provide a rigorous analysis of likely effects. Suppose, for example, that all of the people who are not able to walk their dogs on the weekend at Stinson Beach were to walk their dogs along the Old Stage Road at Mt. Tamalpais State Park. Very likely, the negligible impacts that currently apply to Stinson Beach would become significant impacts on the Old Stage Road. Furthermore, the management of these impacts would be transferred from federal to state responsibility. In this regard, the Mt. Tamalpais web site provides this warning:

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

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

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

Alternative A: No Action (page 301)

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

Similar conclusions reflect a bias at many of the other sites discussed. The

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

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

Appendix E

Additional Comments Related Draft Plan/DEIS Analysis of Water Quality

Chapter 3: Affected Environment

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

sites individually. The Draft Plan/DEIS should follow a similar format in Chapter 3. For example, provide a description and characterization of the water resources for each of the 21 sites.

Chapter 4: Environmental Consequences

1. General ' the Draft Plan/DEIS should be clear under all of the analyses for Alternative A that the impacts would not be new, but rather a continuation of existing/ongoing impacts due to the existing approach to implementing the current GGNRA general management plan.

2. General ' The Draft Plan/DEIS should also be clear in this and other sections that the impact analysis presented for Alternative A is different than the consequences of the No Action alternative were GGNRA to implement an education and adaptive management program under its current plan and policies, which GGNRA could choose to do. The No Action alternative for a management plan is not the same as a "do nothing" alternative. GGNRA can choose to implement its existing plan is a more effective way to meet the purpose and need for the proposal.

3. General ' when impacts are the same across various alternatives for a particular site, the Draft Plan/DEIS should be revised so that the Conclusion Tables contain identical statements.

4. General ' the Conclusion Tables should be grouped together for each site. This would make comparing the various alternatives for each site easier and make the tables more useful.

5. Page 459, last paragraph, states "Impact at the most would be negligible; therefore, impacts to seeps and springs from dogs are not discussed further." If impacts to seeps/springs are not discussed further because the impacts are negligible, then why are there so many discussions in subsequent pages about negligible impacts involving other types of water resources? The Draft Plan/DEIS should be made more consistent by not discussing any negligible impacts in subsequent pages of the water quality section.

6. Page 460, Assessment Methodology'the Draft Plan/DEIS should make an assumption under Assessment Methodology that the public would comply with park/dog regulations and requirements, then remove all of the "assuming compliance" (and similar) statements in the subsequent pages of the water quality section. Also, the Draft Plan/DEIS should provide examples of park/dog regulations and requirements, such as being on leash or properly disposing of dog waste.

7. Page 460, Assessment Methodology'the Draft Plan/DEIS should describe

how impacts are analyzed qualitatively.

8. Page 468, Paragraph 1' is it possible for the increased use at adjacent parks to be concentrated at one adjacent park? Would "impacts on water quality in adjacent lands" still not be "expected to be higher than current conditions" if increased use was concentrated in a particular adjacent park? This comment should be addressed in all instances in the water quality section where this could occur.

Other Minor Corrections

9. Page 461, last two paragraphs ' the paragraphs beginning with "Dogs were determined..." and "A sub study..." seem more like paragraphs that belong in the affected environment section.

10. Page 462, Paragraph 3 ' delete "a" from "...from a many different sources."

11. Page 462, Paragraph 6 'the Draft Plan/DEIS should provide citation(s) for information in the paragraph beginning with "Potentially adverse impacts..."

12. Page 465, Paragraph 5 'the Draft Plan/DEIS should provide citation(s) for information in paragraph beginning with "Oil spills have..." This comment applies to all instances in the water quality section where this information appears.

13. Page 468-470, preferred alternative discussion ' this discussion seems unnecessary as it just repeats previously provided information. This comment applies to all instances in this water quality section where the preferred alternative discussion just repeats previously provided information.

Appendix F

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

Chapter 3: Affected Environment

General:

1. As stated in Chapter 1, use of GGNRA lands by humans and dogs occurred well before the GGNRA was established in 1972. This historical activity should have been considered as part of the Affected Environment. Many sections lack a description or quantification of baseline conditions of

biological resources from long term use by people and dogs, or current impacts are assumed but no data or rationale are given (specific comments follow below). Without this baseline information, the impact conclusions in Chapter 4 and the basis for selection of the preferred alternative are not supported.

2. The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but without specific data as to where/if they are actually present, this claim is unsupported.

3. There are inconsistencies among the text and Table 8 in the special-status species affected environment, the information in Appendix H, and the impact analyses in Chapter 4. Examples include:

- o Presidio's manzanita. Table 8 states that it is documented within the GGNRA and the impact analysis states that it is found at Baker Beach, however Baker Beach is not identified in Appendix H as having potential habitat for this species.
- o San Francisco lessingia. This species is listed in Appendix H as having potential habitat within a number of San Mateo sites. Fort Funston and Baker Beach are not listed under San Francisco sites as having potential habitat; however, these two sites are the only two considered in the impact analysis of this species in Chapter 4.
- o Hickman's potentilla. There has been no documentation of this species within GGNRA. The table lists this species as having potential habitat at 5 sites within San Mateo County; however, the impact analysis in Chapter 4 is only for Mori Point and Pedro Point. What is the justification that these two were the only ones considered if habitat exists at many sites?
- o California seablite. Appendix H identifies this species as having potential habitat at Crissy Field and Land's End (which is missing from the table Key) and that this species has been documented within the GGNRA. The impact analysis in Chapter 4, only talks about Crissy Field and that reintroduction of the species has failed twice, so species is not currently present within the GGNRA.

4. Table 8, Affected Environment: GGNRA Location column contains the location for plants that do not exist there according to the text:

o Lessingia ' does not occur at Fort Funston
o California seablite ' does not occur at Crissy Field
o Hickman's potentilla ' does not occur at Mori Point or Pedro Point

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

5. For wildlife species that are assumed to be impacted by dogs, the Draft Plan/DEIS fails to establish the level of impact the species are already

experiencing, apart from other factors that may be causing disturbances or population decline (within and outside of the GGNRA). This would include issues such as loss of breeding and foraging habitat, predation, climate change, etc. The Draft Plan/DEIS does not indicate how or why a special-status species that has been sharing habitat with dogs for decades will experience a quantifiable benefit from stricter dog management, given other factors affecting the species. For this reason, there is no support for the selected alternatives in terms of actual, foreseeable benefits to wildlife populations. Without this type of information, most impact conclusions in Chapter 4 are not supported. The western snowy plover section of Chapter 3 is a good example.

a. Additional comments on western snowy plover text from Chapter 3: The Draft Plan/DEIS does not adequately describe how dogs chasing the birds can impact the survival of the species. Birds may take flight readily and expend energy, experiencing some short-term disturbance, but there is no evidence of the GGNRA western snowy plover populations being directly impacted by dog activity in the long-term. The data provided in the Draft Plan/DEIS suggests a stable plover population; therefore, the selected alternatives would not be expected to differ from the No Action Alternative (see paragraph 1, page 799).

- Monitoring surveys from 1994-2006 observed 48 off-leash dogs chasing western snowy plovers, which is a relatively low number of events over a 12-year period. As stated above, this information suggests snowy plover populations will not experience significant beneficial impacts from the preferred alternatives, and that the No Action Alternative does not significantly impair natural values.

- The numbers of snowy plovers fluctuated between 1994-2006 "based on a variety of factors", but the presence of dogs on the beach has not prevented the birds from using their preferred resting areas at Crissy Field or their off-site nesting sites; therefore, there are no documented impacts to the population from a "chasing" incident.

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

Field and Ocean Beach. To this day, the Crissy Field Dog Group continues to inform their members and the public about protecting the snowy plover.

The comment is directed toward an example of scientifically unsupported assertions that the Draft Plan/DEIS as a justification for management actions. These become particularly critical when they are used as the basis for large closures of beaches and other areas where access has been allowed for the past 20-40 years without documented impairment of species.

Correspondence ID: 4633 **Project:** 11759 **Document:** 38106
Received: May,17,2011 00:00:00
Correspondence Type: Letter
Correspondence: Frank Dean General Superintendent, GGNRA Building 201, Fort Mason San Francisco, CA 94123-0022 RE: Dog Management Plan/Draft Environmental Impact Statement

Dear Superintendent Dean:

I like dogs, though mine has died and not been replaced. I live near and enjoy the GGNRA.

I strongly encourage you to improve the plan by implementing the following steps:

1. All "Regulated Off-leash Areas" should be fenced, at least in areas where fences do not pose risks to wildlife and habitats. Fences provide more security for all park users and create clearer boundaries so that dog owners are aware of how to comply with park rules.
2. At least some trails in San Francisco should be closed to dogs. Some trails need to be available for people who fear or are allergic to dogs.
3. For millennia dogs have coexisted with mankind and other species. However wild species require more protection than in the past) So balance must be sought to be safe for all while guarding natural and cultural resources for future enjoyment.

I wish you wisdom as you strive to adopt the best measures to protect the National Parks.

Correspondence ID: 4634 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

For over twenty years, I have lived in San Francisco, and for the last nine of them I have shared my home, and my city, with my Bernese Mountain Dog. Crissy Field in particular has been a spot where my dog and I visit many times each week, generally in the early morning hours, to enjoy walks, both on and off leash. I am a retired senior citizen and member of the gay community. Like many residents of San Francisco, I live in a condominium with no yard available for exercising my dog. Therefore, these outings to Crissy Field provide an important recreational opportunity for both me and my dog. In particular, it is one of the few areas where off leash walks and play with other dogs is possible to supplement our daily neighborhood on leash walks.

For the reasons set forth in the balance of this letter, I am opposed to the Preferred Alternative proposed by the GGNRA for management of dogs in the GGNRA. Furthermore, I believe that the Draft Environmental Impact Statement is fatally flawed and therefore cannot be used to support the Preferred Alternative or, indeed, any of the changes proposed by the GGNRA.

Specific Problems With DEIS

1. The DEIS throughout shows a preference for treating the GGNRA like a wilderness national park that should be subject to regulations as close as possible to those used in such parks, i.e., no dogs allowed at all, or only dogs on leash in very limited areas. For example, it states that "a dog management policy inconsistent with NPS regulations and increased use of the park for dog recreation have resulted in controversy, litigation, and compromised visitor and employee safety, affecting visitor experience and resulting in resource degradation." This broad statement is unsupported by any evidence. As reported in the DEIS, problems with dogs represent a tiny fraction of the total incidents and citations issued by the GGNRA over the past decade. Of those, the majority were for so-called leash law violations or for being in a closed area, and did not reflect any safety issues between dogs and other park visitors. Over one third of the incidents were based on reports from the public, not on incidents actually observed by park service personnel, making their reliability questionable.

2. The DEIS is full of impacts on wildlife and other park visitors that "could" occur, but there is little evidence that these impacts actually do occur. If such impacts were occurring, then the past decade of scrutiny of dog related activities in the GGNRA should have produced evidence of them. The lack of evidence indicates that such impacts do not occur, and there is no reason to believe that they will occur in the future. In any event, a management policy that so dramatically changes current uses should not be

based on possibilities and suppositions.

3. The DEIS fails to consider less restrictive alternatives that would take into account actual usage patterns of various GGNRA venues. For example, it would prohibit offleash dogs at all times from the East Beach of Crissy Field. Perhaps this is because this area, closest to the parking lot, is most accessible for those who wish to sit on the beach, picnic, play with their children, and so forth. Fine. But I frequently visit Crissy Field between 6:30 and 8:30 a.m. year round. At this time of day, there are some joggers on the pathways, but virtually no one on the beach itself, other than other dog walkers. Why should a restriction that, for the sake of argument, might make sense during afternoon hours during San Francisco's warm weather periods be imposed 24 hours a day, 365 days a year? Such a policy is inconsistent with the GGNRA's mandate which calls for the "maintenance of needed recreational open space." Off-leash dog walking was one of the traditional recreational uses taking place in the GGNRA when it was created, and the DEIS should take into account alternatives that maximize the opportunity to preserve such traditional uses.

4. The claim that "environmental justice" requires severe restrictions on offleash dogs is not supported by the studies cited in the DEIS. A DEIS cited 2007 San Francisco State study claims that all Latinos and Asians surveyed said that dogs were a problem. However, the study was not about the "ethnic minority visitor use experience at the GGNRA" as claimed in the DEIS, but was actually intended to address ways to improve connecting people to the parks. In any event, the SF State study involved only 100 people who were largely unfamiliar with the GGNRA. My own observation is that people of all ethnic and national origin backgrounds and their dogs enjoy offleash experiences at Crissy Field which the proposed changes will deny to them.

5. The DEIS fails to take into account the impact the Preferred Alternative would have on surrounding areas. As a dog owner, I know that there are few opportunities for off leash recreation in San Francisco parks. The extreme reduction in off leash space in the GGNRA will force dog owners to crowd into existing city park space which is already in short supply. The DEIS omits any serious consideration of this impact.

6. In assessing dog impacts on natural resources, the DEIS refers to studies that note general tendencies of dogs to create adverse impacts, but there is scant site specific evidence. There is also inadequate documentation of other sources of adverse impacts on natural resources, such as other park visitors, wildlife, storms, bicyclists, etc. The assumption appears to be that any negative impacts should be attributed to dogs and not to other factors. 7. The DEIS includes a "compliance based management strategy." Under this scheme, compliance with the Preferred Alternative restrictions will be

monitored. If the GGNRA determines that there is an insufficient level of compliance, then it may unilaterally impose the next most restrictive level of usage. This procedure is grossly unfair in a number of ways. First, it is one sided in that it allows a revision of policy to a more restrictive level for non-compliance, but not to a less restrictive level if compliance is good and impacts are less than anticipated. Second, rather than focus on compliance through education, clear signage, and so forth, it uses only an enforcement and punishment strategy. Third, it punishes the many for the transgressions of a few. Finally, it places enormous power in the hands of the GGNRA by permitting it to make such changes without any opportunity for public input or review. At the very least, it creates a path by which the GGNRA can move toward its preferred solutions on its own without the public process that it has been required by the courts to pursue thus far.

8. ' Perhaps most troubling is the fact that at no point in the DEIS is the No Action alternative seriously considered. The current usage of the GGNRA has been in effect since 1979. It seems inconceivable to me that there is no place within this vast area where dogs and their people could continue to enjoy this urban treasure just as they have up until now. The failure of the DEIS to explore such possibilities is further evidence that it is fatally flawed. Thank you for your consideration of these comments.

Very truly yours, Howard P. James

Correspondence ID: 4635 **Project:** 11759 **Document:** 38106
Received: May,05,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

You have a different job in guiding the natural processes of GGDRM! I believe that dogd must be leashed when migrating water fowl are in the area. I believe the hours should to be set = dogs run free until 10am and after 5pm. Muir Beach is perhaps a place where dogs should be leashed at all times.

Thank you for listening.

Mimi Burton

Correspondence ID: 4636 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter

Correspondence: b. Additional comments on mission blue butterfly text from Chapter 3: the text is not consistent with Table 8 'text states that the species is found in Alta Trail and Tennessee Valley, but these are not listed in the table.

- There is no clear nexus between dogs and the mission blue butterfly habitat and host plant, and there is no evidence given of damage to the host plant from dogs. Because the area is fenced "but does not physically exclude dogs", the current and historic use of the area by does not appear to be detrimental to the mission blue butterfly or its habitat/host plant, therefore selection of the No Action Alternative is supported.

- Mission blue butterfly habitat is "very near" closed social trails that are still used by visitors and dogs; however, there are no data to suggest alteration of the habitat. Because these trails are closed and their use by dogs is not quantified, the species' habitat does not appear to be impacted by dog use, and the No Action Alternative does not significantly impair natural values.

c. Additional comments on tidewater goby, Coho salmon, steelhead trout, California red-legged frog from Chapter 3: For each species it is indicated that the habitat areas are essentially closed to dogs, but that "these closures are not always followed". Presumably the use of these areas is rare. Because dog use of the habitat areas is not quantified, there does not appear to be a nexus between dog use and these wildlife habitat areas, therefore the No Action Alternative does not significantly impair natural values.

d. Additional comments on bank swallow from Chapter 3: The nesting colony is well monitored and closed to visitor access, and the nature of reported disturbances is unclear ("Fort Funston has moderate to high visitor use, and in 2007-2008 there were two pet citations, warnings, and reports taken related to wildlife disturbance at the site."). This small number of incidents over a two-year period does not appear to have affected bank swallow populations; therefore, the No Action Alternative does not significantly impair natural values, and no benefits from the draft preferred alternative are anticipated.

Vegetation and Wildlife, pages 228-244:

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

effect on wildlife populations, habitats, or individuals.

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

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

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

Special-Status Species, pages 244-256: 1. General. Descriptions of critical habitat are missing for some special-status species that have critical habitat in the GGNRA and inconsistent in the level of detail provided regarding critical habitat among all species descriptions. For this reason, there is no clear nexus between dogs and critical habitat, and the preferred alternatives are not supported.

2. General. Some species descriptions suggest a nexus between dog activity and the species and/or their habitat (tidewater goby, California red-legged frog), but other species descriptions do not (San Francisco garter snake,

Coho salmon). Where there is likely to be none, it is not stated. Where there is no nexus, the draft preferred alternative is not supported in terms of direct benefits to these species. Even where a nexus is suggested, there is no evidence of impact to these populations; therefore, the draft preferred alternative does not appear to provide a quantifiable benefit to the species and the No Action Alternative does not significantly impair natural values.

3. Page 245, Paragraph 3. States that "marine mammals are not expected to be affected by dogs", but that stranded marine mammals "may provide an opportunity for contact" with dogs. Given the relatively low number of marine mammal strandings within GGNRA over nine years (as shown in Table 7), it is not rational to assume a nexus between stranded marine mammals and dogs. There is no evidence of a harmful interaction between a stranded marine mammal and a dog. In fact, dog owners are often the first to notify authorities when marine mammals become stranded.

Chapter 4 ' Environmental Consequences

General:

1. On page 30, in Chapter 1, under "Safety of Off-Leash Dogs", studies are cited where data indicated off-leash dogs do not travel far from their owners or trail, and if they did it was a short time and the dogs were rarely seen chasing other dogs, disturbing wildlife and vegetation, or entering bodies of water. In addition, a survey was cited where both dog owners and non-dog owners believed that humans are more disruptive than dogs. This contradicts many of the impact conclusions made for vegetation, wildlife, and special-status species. The conclusions drawn in the impact analysis are not adequately supported by documented evidence of damage to resources (that can be attributed to dogs) in the GGNRA.

2. General habitat types and which sites they occur in are described in the affected environment section; however, the document lacks a map of the specific location of each habitat types within each site relative to existing and proposed dog use areas and trails. The impact assessments in Chapter 4 are divided up by habitat type, yet all of the actual impact assessments identify impacts on "vegetation" with no indication of whether or not a particular habitat type occurs within the area of discussion (LODs and ROLAs). Without documentation of the specific location of vegetation types relative to dog use areas, conclusions of impacts on these resources are not adequately supported. For example in the wetlands section the Draft Plan/DEIS describes impacts to vegetation along trails within six feet on either side; however, there is no evidence to support the claim that wetlands actually exist adjacent to the trails. In those instances, the wetlands impact analysis is inaccurate.

3. The analysis of the impacts to vegetation lacks empirical evidence of the current impacts caused by dogs. Information is given as to usage and the number of violations but does not site specifics about damage caused by dogs as a result of these violations. Without evidence of the occurrence of impacts caused dogs, impact conclusions made are not adequately supported.

4. For a number of the analyses of Alternatives B-E, the Draft Plan/DEIS states that the area of impact is previously undisturbed. These claims are false as dogs are currently allowed in those areas and dog use would continue under Alternative A, the No Action Alternative.

5. The impacts addressed in Alternatives B-E are assessed based on the assumption of compliance. Alternative A is not assessed this way. For example, if dogs are required to be on leash under Alternative A, the impacts are assessed based on impacts caused by dogs which are off-leash and noncompliant. Alternatives B-E then assesses impacts based on the assumption of compliance and therefore the impacts are reduced even though the leash-law regulation is the same under all alternatives. Assessing impacts based on identical regulations with different assumptions is inaccurate. There is no information given as to why compliance under Alternatives B-E cannot be done under Alternative A. The current GGNRA management plan identifies public education of GGNRA resources as important and could be accomplished under Alternative A.

Introduction (pages 289-290):

1. The compliance-based management strategy assumes that noncompliance is causing negative impacts on GGNRA resources. As commented in Chapter 3, this assumption is not supported by adequate data from GGNRA sites. This strategy (page 290, paragraph 2) "is designed to return impacts to a level that assumes compliance" and "provide beneficial impacts where dog walking is reduced or eliminated". There has been no baseline given to quantify a "level that assumes compliance"; therefore, any potential impacts from dogs cannot be measured or used as a basis for selecting alternatives.

2. The Draft Plan/DEIS states that dogs and humans have been active in these lands for at least the past 40 years (pre-1970s), and that visitation has been consistent over the past 20 years, and will likely remain consistent in the next 20 years. Page 290, paragraph 5, also notes that visitation is not expected to increase over the next 20 years, and that this is "similar how it has been operating over the previous 20 years. Therefore increased visitation should not result in cumulative impacts to GGNRA resources." The basis for assuming that resources have been negatively impacted over the past 20 years and will therefore benefit over the next 20 years with substantially less

access for people with dogs has not been established.

Vegetation:

1. Page 545, Paragraph 2 'the EIS includes no discussion of what "additional actions" would potentially have adverse impacts on vegetation and what types of impacts. Text also states that "mitigation for these projects would reduce the potential for impacts." However, there is no discussion as to what kind of mitigation would occur and how it would reduce impacts. Therefore, no measure of a quantifiable reduction of impacts can be determined by mitigation efforts. For projects outside of GGNRA, it is assumed that mitigation would be applied. There is no evidence to support this assumption. More specific information is needed to adequately assess and comment on impacts. This comment applies to this same text where it is repeated in the cumulative impact analysis throughout the section and the wildlife and special-status species sections.

2. Page 546, Alternatives B & C ' dog walking restrictions are the same as in Alternative A. There are no data that supports a change in the level of impact as a result of these alternatives.

3. Page 584, Alternative B ' states that the rocky intertidal plant communities have not been previously disturbed. This is inconsistent with Alternative, A which states that dogs could access the rocky intertidal areas. The inconsistency of the baseline level of disturbance prevents an accurate conclusion as to the potential for impacts caused by dogs.

4. Page 597, Cumulative Impacts, paragraph 3 this paragraph does not make sense, The text states that adverse impacts from dogs combined with beneficial actions balance out resulting in negligible impacts. Cumulative impacts should be revised to indicate they would not be long term, major and adverse.

5. Page 605, Alternative A, paragraph 1, states that dogs can affect the rocky intertidal vegetation. No evidence has been provided to support that dogs are presently having adverse impacts on this vegetation.

6. Pages 607-08 and 666-667, Alternatives B & C 'these alternatives mention the Polywog Path and ponds. There is no discussion of the significance of this path or the ponds or the potential impacts of these areas under Alternative A so the impact conclusions relative to the baseline are not clearly presented.

7. Page 619, Alternative A, states that physical damage and nutrient addition from dogs is assumed to be currently happening; however, there are no data presented that supports this claim. Other impacts described seem overstated

considering low visitor use. Because current conditions have not been adequately established, there are no quantifiable changes expected from the Preferred Alternative over the No Action Alternative.

8. Page 632, Paragraph 2, states that dogs would impact coastal scrub, chaparral and grassland vegetation. There is no evidence provided to support the occurrence of this under existing conditions and therefore, no quantifiable benefit expected from the preferred alternative over the No Action Alternative.

9. Page 634, Alternative C, paragraph 1 ' There is no evidence that dogs confined to a ROLA increase impacts to adjacent habitat. Without establishing the current level of impacts from dogs in ROLAs, no quantifiable change can be expected from the preferred alternative over the No Action Alternative.

10. Page 645, Alternative A, paragraph 1' "...viable plant communities exist." Data are lacking as to the type of plant communities that exist in the areas adjacent to the trails and fire roads in order to clearly describe suggested impacts. 11. Page 658, Alternative A, paragraph 1, states that several threatened and endangered plants grow in serpentine soils. There are no data to support the presence of these species at this site. This information is needed to clearly describe suggested impacts.

12. Page 698, Wetlands and Aquatic Habitats, General Comment ' many of the impacts to wetlands are based on six-foot corridors adjacent to trails. There is no mention of where exactly wetlands are located within each site and whether or not they occur within six feet of the trails. Each impact just says "vegetation adjacent to trails" which is not specific to wetlands or aquatic communities in which this section is solely addressing. Without evidence of the exact locations of wetlands and aquatic habitats within each site, no assessments can be made as to the level of impacts of the preferred alternative over the No Action Alternative.

13. Page 740, Native Hardwood Forests, General Comment ' impacts to this habitat by dogs would vary by maturity of the trees. All impacts seem to just state "vegetation" which does not clearly describe suggested impacts.

14. Page 740, Alternative A ' Data are needed as to the maturity of the trees in order to assess the level of impacts caused by dogs under all alternatives. Dogs would not be able to trample mature trees.

15. Pages 769-774, Alternatives B-E, states that riparian vegetation along trails would be impacted. There is no evidence to indicate that riparian vegetation occurs along trails and therefore, no quantifiable changes in impacts can be expected from the preferred alternative over the No Action

Alternative.

Wildlife (pages 791-1108):

1. General. It is assumed throughout the analysis that marine mammals and shorebirds would suffer negative impacts from off-leash dogs and that birds would suffer negative impacts from on-leash dogs. There is no evidence to support this assumption. As noted in comments above, a disturbance is not the same as an impact. NEPA defines "effect" or "impact" as requiring a likely causal consequence (40 CFR '1508.8). Under NPS and GGNRA policy, as explained in the Draft Plan/DEIS (page 35), the impact would likely need to impair the natural values afforded protection under applicable plans or policies. Under NEPA, the significance of that impact needs to take into account context and intensity (50 CFR '1508.27). Because current conditions have not been adequately established, there are no quantifiable changes expected from the preferred alternative over the No Action Alternative.

2. General. For preferred alternatives in coastal areas that allow dogs on leashes, it is stated that on-leash dogs could still disturb shorebirds by barking or presence; however, the impacts are determined to be negligible. In other sections, it is suggested that barking and presence of off-leash dogs would result in minor to adverse moderate impacts. Again, because the potential level of disturbance has not been clearly established, there is no basis for assuming the presence of dogs will have significant adverse consequences relative to other factors (such as people or predators) or to quantify changes expected from the preferred alternative over the No Action Alternative.

3. General. In some areas, the difference between the No Action Alternative and preferred alternative is off-leash and on-leash use. Long-term minor to moderate impacts are expected for off-leash dogs, and long-term minor impacts are expected from on-leash dogs, although the difference in disturbance to wildlife between on- and off-leash dogs under voice control has not been established. Physical damage to nests and habitat and wildlife chasing is cited as a moderate adverse impact; however, the level of current damage is not known. The data presented in Appendix G further indicate limited interactions over time. This is noted for: o Homestead Valley, Alta Trail, Oakwood Valley, Marin Headlands, Fort Baker, Baker Beach and Bluffs, Lands End, Mori Point, Milagra Ridge, Pedro Point coastal scrub, chaparral, and grassland habitats. o Fort Baker forest habitat o Marin Headlands outside of LOD area, riparian habitat o Fort Miley, other coniferous community

4. Throughout the analysis, Alternative A (No Action) assumes noncompliance, while the other alternatives assume full compliance with

dog restrictions (which leads to a "long-term minor adverse impacts" conclusion for Alternative A and a "negligible" conclusion for the preferred alternative). In some cases, the only difference between Alternative A and the preferred alternative is the assumption of compliance. When proposed dog management is the same for a given area under two or more alternatives, the impacts should also be the same. Many of the differences in impacts are based on assumed compliance under the action alternatives; however, as noted above, an unbiased comparison would assume compliance for all alternatives. This is noted for: o Stinson Beach (coastal) o Crissy Field (outside of ROLA - coastal and wetland) o Baker Beach and Bluffs (outside of ROLA - coastal) o Mori Point (coastal and wetland) o Oakwood Valley (outside of ROLA - forest) o Muir Beach (riparian)

5. Page 794, Duration of Impact (same comment for page 1112 of Special-Status Species) "The assumption that "all natural resources" will experience short-term impacts during the education and enforcement period, regardless of the alternative chosen, is not supported. It may be accurate to state that the existing conditions will continue during the education and enforcement period of an adaptive management plan. The section goes on to note it is "expected that compliance...and associated adverse impacts would improve gradually and impacts on wildlife would then become long-term." This expectation is not supported by the information provided in Chapter 3. There are little data or descriptions of current adverse impacts; therefore, there is no baseline provided that would indicate improvement under the preferred alternative. The assumption that impacts will become long-term (described as persisting for the next 20 years) is also not supported, given the lack of adequate, quantifiable baseline conditions.

6. Pages 796-797, Impacts Common to All Alternatives ' prey species are adapted to fleeing from predators, whether dogs or any other. Although the Draft Plan/DEIS labels this as harassment (based on a definition in the Endangered Species Act, which does not appear to be the appropriate standard), it would nevertheless not be expected to impact the species. Even if a species avoids near-trail areas because it has adapted to the presence of dogs (a potential predator), it does not mean that species is experiencing an adverse impact. The Draft Plan/DEIS states that "actual direct injury or mortality to wildlife by dogs (on or off leash) is rare," so any potential long-term, adverse impact from this "harassment" is not expected. The studies currently cited are not supportive of the preferred alternative ' it is not unusual for a rodent (marmot) or bird to react to a predator.

7. Page 797, Paragraph 3 ' a study is cited concluding that "off-leash dogs have no impact on the diversity or abundance of birds and small mammals because these species are fairly tolerant of...human activity," which indicates the No Action Alternative would not significantly impair natural values. o The results of the study by Shulzitski and Russell (2004), is cited

in support of dog restrictions; however, this study appears to be biased. The restricted area was restored with native vegetation, while the unrestricted area was not restored. Wildlife was more abundant in the restored area, but this may have been due to the re-planted native vegetation there is no evidence to suggest that restricting dogs caused an increase in abundance. The observation of a dog barking at a fox (whose behavior remained unchanged) at Fort Funston supports the argument that wildlife in GGNRA are acclimated to dog presence and that the No Action Alternative would not significantly impair natural values.

8. Page 800, Paragraph 2 ' "When compliance is assumed, management alternatives that would prohibit dogs from accessing wildlife habitats would eliminate disturbance to wildlife from dogs..." The Draft Plan/DEIS states that GGNRA visitors sometimes access restricted areas, but these occasions are not quantified, nor is the baseline conditions in these areas provided. There is no evidence to suggest wildlife would experience benefits from prohibition associated with the selected alternative. Although compliance should be assumed for all alternatives, there will likely be some non-compliance by a various visitors, with or without dogs. Because perfect compliance cannot be assumed, and because the current conditions are not known, it cannot be concluded that the alternatives would provide a benefit to wildlife over the No Action Alternative.

o "Prohibiting dogs from areas also prevents habitat degradation and loss of species that are sensitive to the presence of dogs" ' this has not been supported in the text. Loss of species from dogs in the GGNRA has not been presented. While the Draft Plan/DEIS presents a few studies that suggest certain species are "sensitive" to dog presence, it presents other studies that found little or no sensitivity to dog presence; therefore, the preferred alternative is not supported.

9. Page 802, Compliance-Based Management Strategy o Because some noncompliance is already occurring, it is unclear why supposed impacts would increase and potentially become "major adverse" if noncompliance continues, especially given the relatively stable visitor level in recent and projected years. Again, the baseline conditions, including 40 years of use by people with their dogs, have not been established and any impacts stemming from noncompliance have not been outlined; therefore, there is not adequate support to conclude major adverse impacts. o There is no description of how or if newly restricted areas would be monitored for a change in natural resources. Because the baseline conditions have not been established, changes in management based on noncompliance should be approached with care.

10. Page 809, Alternative A ' it is unclear how shorebirds, gulls, terns, and marine mammals would experience moderate adverse impacts from dogs, or

how "occasional to frequent disturbances would occur", given the documented low shorebird abundance, and no historic incidence of dogs affecting marine mammals at Muir Beach. See prior comment on marine mammals (page 245).

11. Page 812, Alternative D ' it is unclear how species will benefit from total exclusion, because it hasn't been established that species are currently being negatively impacted on Muir Beach. There would likely be "no change".

12. Pages 825-826, Alternative A ' the rationale for the "long-term minor adverse impacts" conclusion does not mention mission blue butterfly habitat; however, for the preferred alternative, beneficial impacts are assumed because dogs would no longer be allowed on Battery Yates Trail (near mission blue butterfly habitat).

13. Pages 856-857, Alternative A ' the snowy plover resting areas have been monitored since 1996 with no evidence to suggest that preferred habitat use has changed (the snowy plover section of Chapter 3 states that birds continue to use the same two resting areas), or that roosting and foraging behavior is being adversely affected by dogs, yet this is given as rationale for long-term moderate to major adverse impacts.

14. Page 971, Alternative A, states that on-leash dog walking is currently allowed at Sweeney Ridge. There is no baseline condition given to quantify any supposed impacts currently occurring at Sweeney Ridge that would lead to a "no impact, beneficial change" under the preferred alternative (prohibiting dogs from Sweeney Ridge).

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

Special-Status Species (pages 1109-1291):

1. General. Suitable habitat for the plant species discussed in this section occurs at other sites which were not analyzed in this section. The Draft Plan/DEIS lacks a discussion as to specifically why certain sites were chosen over others for analysis.

2. General. The microhabitats of the special-status plant species are very

specific. The Draft Plan/DEIS lacks information delineating the location of the potential habitat within each site. This is necessary to establish a baseline for the current level of impacts by dogs in these areas and accurately assess the potential impacts based on the alternatives. This information is essential and capable of being obtained.

3. Page 1112, Assessment Methodology ' analysis of vegetation changes does not account for aquatic critical habitat loss. Was loss of critical habitat for aquatic species measured?

4. Pages 1117-1123, San Bruno elfin butterfly ' here, Alternative A and the preferred alternative do not differ (on-leash, negligible impact). The impact of Alternative A appears to assume compliance with leash law, and it is stated that "historical use of this area shows no indication that the host plant or butterfly is being affected by dogs;" therefore, the No Action Alternative would not significantly impair natural values.

5. Page 1124, paragraph 2, mission blue butterfly, cites localized, perceptible damage to habitat on trail beds, roads, and adjacent areas "as a result of damage to the vegetation from dogs", but there is no description of how this was assessed. These areas are used by hikers, runners, naturalists, bikers ' how is damage from dogs isolated from these other potential sources? The preferred alternative expects negligible/beneficial impacts by eliminating use of social trails by dogs, but it does not appear that continued human use was considered in this conclusion (same comment applies to conclusions for other analyzed mission blue butterfly areas: Oakwood Valley, Marin Headlands). As stated previously, baseline conditions on these trails have not been adequately established; therefore the negligible/beneficial impacts cited under the preferred alternative are not supported.

6. Pages 1147-1158, mission blue butterfly, Fort Baker and Milagra Ridge ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) and the preferred alternative assumes compliance (negligible to minor, adverse impacts, with habitat restoration programs). This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

7. Pages 1165-1172, tidewater goby ' Alternative A states that Rodeo Lake is currently closed to dogs, and the lagoon is closed to dogs and humans. The proposed fence "will deter but not physically exclude dogs". It is explained that dogs in voice-controlled areas are not very well controlled and have been observed in the lagoon. Impacts range from negligible to long-term, moderate adverse. Under the preferred alternative, Rodeo Lagoon would remain closed and dogs are still able to access the area; compliance

with leash restrictions and ROLAs is assumed. The impacts under the preferred alternative are expected to be negligible ' again, this conclusion seems merely based on an assumption of compliance, when the level of use and potential for noncompliance is the same as under the No Action Alternative. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

8. Pages 1172-1191, Coho salmon and steelhead trout ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible impacts). This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

9. Pages 1191-1219, California red-legged frog, Muir Beach, Marin Headlands, Mori Point, Cattle Hill, Pedro Point ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

10. Pages 1219-1240, San Francisco garter snake, Mori Point, Milagra Ridge, Cattle Hill, Pedro Point'as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). The text states (page 1230) that there is no documentation that the current level of compliance with on- leash laws (No Action Alternative) is impacting this species. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

11. Page 1240, western snowy plover ' states that walkers who traverse the beach area currently impact plovers. As described in Comment 6, it is difficult to distinguish between dog and human activity. The basis of the impacts conclusion is based on the assumption that dogs currently impact snowy plovers at Crissy Field, but there is no evidence to support that removing dogs from the area will result in a change in the plover population. The preferred alternative assumes compliance and negligible impacts by closing the site to dogs. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance. There are data provided of observations of dogs chasing birds, but no correlation between these events and impacts to the species (see prior comments on Chapter 3). These observations have been made since 1996, but the plovers' use of preferred habitat does not appear to be limited. There is no obvious nexus between dog chasing and loss of species or habitat, therefore the "moderate adverse impacts" under the No Action Alternative

are not substantiated.

12. Page 1264, bank swallow ' as with the Western snowy plover, current impacts are considered minor to moderate based on occasional to frequent perceptible disturbances to the species from dogs; however, the description of Alternative A mentions only that dogs have been seen in the bluff area. There is no apparent nexus between dog activity and actual short-term or long-term impact to bank swallows.

13. Page 1277 ' This is contradictory ' there is no evidence that the spotted owl exists at the site; however, impacts are deemed adverse under the No Action Alternative. If it is because potential habitat exists, then it seems (page 1282) that no change would occur under the preferred alternative, in which dogs remain leashed. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

14. Page 1291 ' according to the table in Appendix H, suitable habitat for the listed plant species exists at many sites. There is no discussion of what rationale was used to determine which sites were considered in this analysis.

15. Page 1292, 2nd paragraph ' there is no evidence of dogs currently accessing the dune scrub vegetation presented to support the impact conclusion. Without adequately establishing a baseline for current impacts, no quantifiable changes in impacts can be expected from the preferred alternative over the No Action Alternative.

16. Page 1296, Alternative D, states that impacts to lessingia adjacent to the trails in the LOD area would occur in areas that "have not been previously disturbed." However these areas are currently open to dogs, therefore any impacts from dog use would already be occurring. Therefore, the level of impact is misrepresented. Similar statements occur throughout this section including pages 1305, 1316, and 1323.

17. Page 1306, Alternative C, conclusion table, states "if potential San Francisco lessingia habitat is located in the LOD area." Locations of the potential habitat should already be known, and impacts should be based on whether or not potential habitat is actually present. Without data supporting the location of lessingia habitat, no conclusions can be made regarding the potential impacts.

18. Page 1311, Paragraph 1, states that the greatest benefit to the species would occur if the Daly City genotype is reintroduced at Fort Funston. There is no evidence given that the implementation of this is expected. This would be relevant to the proposed management of the area and concern for

potential impacts.

19. Page 1312, Alternative A, states that the widening of the Coastal Trail would increase impacts to Presidio manzanita. This is inconsistent with the cumulative impacts on page 1313, which states that the trail realignment would avoid the manzanita and provide long-term protection.

20. Page 1325, Paragraphs 1 and 2 these two paragraphs are inconsistent with each other. Paragraph 1 state impacts to Marin dwarf-flax adjacent to the trails would be long term, minor and adverse. In paragraph 2, it states that the plant exists in soil outcrops that are inaccessible and that physically restraining dogs would protect the habitat and restored population.

21. Page 1329-1332, Alternatives B-E ' dogs are prohibited from Crissy Marsh under the No Action Alternative as well. dogs are prohibited from the marsh under all alternatives, impacts should be the same. This section should be revised to assume the same level of compliance. See previous comments regarding noncompliance.

22. Page 1333, Hickman's Pontentilla ' No justification is given as to why only Mori Point and Pedro Point were the only two sites analyzed if no mapped occurrences have been recorded there and potential habitat exists at other sites as well (per the affected environment and Appendix H).

23. Page 1336-37, Alternative C, conclusion table 'the rationale for impacts in the LOD area should be the same as the other Alternative B impacts, based on the text discussion.

24. Page 1342, Alternative C, conclusion table the rationale for impacts in the LOD area should be the same as the other Alternative B impacts, based on the text discussion.

Correspondence ID: 4637 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Mr. Dean,

I am writing to oppose the GGNRA's draft dog management plan. It is not based in fact; instead it relies on speculations, exaggerations and misleading statements. It reaches conclusions that are not supported by either science or the law.

The GGNRA can accommodate both recreation and conservation. It was designed as an urban recreation area, not pristine wilderness areas like

Yosemite. In fact, the courts have repeatedly upheld the existing 1979 pet policy. They have said that it was consistent in both fact and intent with the original mandate for recreation upon which the GGNRA was founded. Much of the land in the GGNRA has been donated, do you think that these gifts were only to people without dogs.

This plan disregards the health and well-being of people, dogs and the community. It arbitrarily excludes the tens of thousands of Bay Area residents who exercise regularly with their canine companions. This plan discriminates against all people with dogs, including tourists, seniors, families, the disabled, minorities, and others. I have lived in Pacifica for 45 years and have walked my dogs at Ft. Funston, all the beaches in Pacifica, as well as Sweeney Ridge, Mori's Point and Montara Mt., to have these places taken away is simply too awful to accept. Dog walking is mine and many of my senior friends' primary sources of exercise.

The GGNRA draft management plan does not provide evidence to justify such drastic changes to 40 years of health dog recreation. The Park Service should revise the dog management plan to:

? Honor the original 1979 Pet Policy. Respect dog-walking as legitimate recreation, especially in areas that have been used by dog walkers for decades. We are taxpaying citizens and we should certainly have rights and privileges along with the non-dog owners.

? Provide for off and on-leash dog walking on all trails and other lands acquired by the GGNRA since 1979, especially in San Mateo County. Petition the State and Counties to allot a portion of their park land to dogs and their owners. I have hiked in the state and San Mateo County parks for more than a year, and logging more than 400 miles in areas that were virtually deserted of all people. There is plenty of space that could be shared with the dogs and their owners, if not in the parks on the fire roads. Thus, if there were more space allotted to dogs and their owners, the density of dogs in any specific area would be lessened and consequently less supposed incidents.

? Exclude speculative exaggerated, biased, or misleading statements and studies.

? Provide reasonable ways to address any significant adverse impacts from recreational activities. Use objective standards applicable to other recreational activities (e.g. hikers, equestrians, boaters, fishermen, surfers, bicyclists, beach-goers, joggers, walkers, etc.). In the parks it is humans who are littering and violating the landscape (no dogs allowed).

? In reference to the threatened birds at Fort Funston, the dogs chase away

the ravens and crows that are always on the cliffs over the beach. These birds are the worst predators of the plovers and bank swallows, they feed on other birds' eggs and babies.

Sincerely, Rosalie P. Leavitt

Correspondence ID: 4638 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: GGNRA General Superintendent

Dear Frank Dean,

For the past two yeras I have walked my neighbors dogs in Montata on Poss Property, now GGNRA. It has been a wonderful experience for the dogs and myself. The people I have met on the property are responsibe pet owners, most of whom had rescued their dogs from shelters. There are litter cans and bags available on the property donated by local neighborhoods which I understand fought hard to keep this property from development. I propose to reserve a portion of this property for dog owners and their pets to enjoy. It would be a sad injustive to restrict this recreation.

Karla Smutz

Correspondence ID: 4639 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My reaction to receiving the Draft Dog Management Plan was overwhelming sadness. We were promised a "Section 7" to legalize off-leash recreation in the Golden Gate National Recreation Area, something that should have been done correctly when the 1979 Pet Policy was adopted. The Park Service insists that all the areas under its jurisdiction must be managed in exactly the same way, but Golden Gate National Recreation Area was established in order to provide recreation to an urban population. When the GGNRA was in the planning stages, many San Franciscans were hesitant: why should we give up all of our beaches to the Park Service? They will try to turn the land into a National Park! "Oh, no, this is something entirely different," we were reassured. Off-leash recreation is a favorite activity for thousands of people in the Bay Area. The Park Service take on this? Too many people are participating in this recreation, so we

must limit the areas where it is allowed. Basic economic principles teach us that when demand increases, so does supply! The Draft Dog Management Plan should be looking at additional areas to permit off-leash access, not reduce it!

I can't believe this is the Management Plan that Brian O'Neill envisioned. I think he truly recognized offleash recreation as legitimate recreation and was honestly seeking a Plan that was inclusive.

I will concentrate on Fort Funston, since that is the primary area that I walk in nearly every day. I first visited Fort Funston on October 1, 1961, the first day it was open to the public after it was turned over to the City of San Francisco from the US Army. I rode my bike, camera in hand and have Kodachrome slides from that day. (October 29, 1961 was the first official "open house"-I was there that day as well). I went off to college & didn't live in the Bay Area again until 1969. When the GGNRA was established in 1972, we were delighted. Fort Funston was where we went every week-end (often also heading for Marin Headlands as well with our two children (born 1972 & 1974) and always our Taffy dog {1967-1984}). In the mid-70's, I was always amazed at how many people at Fort Funston seemed to know each other. It wasn't until 1995 when I retired that I was able to visit Fort Funston with my standard poodle Liza on a daily basis. When Liza unexpectedly died, I was overwhelmed with the sympathy extended by my new Fort Funston friends. Keli Poodle joined our family soon after, and for 12 years she and I were at Fort Funston nearly every day. She and I both made lifelong friends we walked from the parking lot to the last bench or down to the beach. By the time Keli joined our family, there were some other reasons to walk: doctor's orders! I have asthma; walking is one of the best "treatments". I have arthritis in both thumbs, making holding a leash for extended time very uncomfortable. My husband Bob walks with a cane ... and actually walks very little (but will walk not at all if the dogs are forbidden from the Sunset Trail), so dogs are my primary walking partners. I now have Jorja and Guinness, two standard poodles. Walking with them on-leash is tedious. Walking with them (and watching them play together as well as interact with lots of other dogs) off-leash is a joy. It is something I look forward to every day. Would I walk every day (as I have been instructed to do ...) if I didn't have dog coaches? Probably not. There are rainy days, windy days, cold days, foggy days, busy days; there are lots of reasons to not go. But when four big brown eyes are looking at me, it is pretty hard to say "we are not going today" to them!

Fort Funston has been described as Mecca for dogs. Indeed, people from all over the Bay Area drive to Fort Funston to enjoy a real walk with their dogs. They do not come to watch their dogs play in an ice plant patch (incidentally, the ice plant will not last two months if the Park Service succeeds in corralling all the off-leash play into an area that no one plays in

now.) Park Service representatives have stated that "we want the people who aren't coming now to come." Why? Fort Funston is at capacity now and probably over capacity on nice week-end days. The Forest Service learned a long time ago that dispersing recreational use over a larger area (or areas) reduces impact. If the Sneath Lane entrance to Sweeney Ridge were available for off-leash walking, that would probably divert some of the Fort Funston use to San Mateo County (a notoriously dog unfriendly county). The New Lands in San Mateo County (where people have walked dogs off-leash for decades) need to be considered for off-leash recreation. The rationale that adjacent San Francisco Water District Lands don't allow dogs is hardly a reason to forbid off-leash recreation. The San Francisco Zoo is close to Fort Funston; the Zoo doesn't allow dogs; therefore, dogs shouldn't be at Fort Funston. Doesn't make much sense, does it?

I served on the committee that was supposedly charged with "negotiated rulemaking". I agreed that there might have to be compromises, as did the representatives of all the other dog friendly groups. Apparently, that requirement (compromises) was not a requirement for many of the other folks that served on this committee. I went to each and every area that the GGNRA manages. I walked/hiked. I photographed each area. I assumed we'd be talking about specific areas and how they were being used currently and how to manage them better. I thought we might be able to discuss access (Milagra Ridge, for example, is basically a neighborhood park because the parking is extremely limited & the access without an automobile is difficult). We suggested discussing timed use (successful in a number of areas). We were told that timed use was too difficult for people to understand! We suggested a tag system, similar to one being used by Boulder Open Space in Colorado (with people actually going to Boulder to investigate the use). That, too, was dismissed. So, in two years almost nothing was accomplished. I was disappointed in the facilitators and disgusted that a few people made sure that nothing was ever really discussed. And yet the Park Service managed to come up with a huge plan that is NOT a result of any negotiated rulemaking.

I would like to see "no action" for all of the GGNRA lands ... codifying the 1979 Pet Policy (and not stating that it is not valid; a federal judge has declared that it is indeed valid). I want to see off-leash areas (and on-leash trails) in all the areas in San Mateo County, including the New Lands that are being added to the GGNRA.

After working on off-leash dog politics for nearly 20 years, I was so disappointed by the Draft EIS/Dog Management Plan that I became physically ill. Reading through the Park Service proposals and finding nothing positive about off-leash recreation (or even on-leash walking!) was sickening. Walking every day and meeting other dog walkers, most of whom are not only responsible dog owners, but also avid environmentalists

and discussing the obvious disregard the Park Service has for a big percentage of the GGNRA visitors has been an eye opener. I am very proud of the off-leash community. People with new energy have stepped up to the plate. People have spent thousands of hours crafting thoughtful responses to the Draft EIS/Dog Management Plan. I trust that the Park Service will be as diligent in really examining the comments that so many people have worked so hard to produce. These are people who are out in the GGNRA every day and want a plan that is fair, a plan that can succeed, a plan that balances preservation and recreation. In reading the Plan, it looked as if it were written mostly by people who'd never actually set foot in the areas they were proposing either banning dogs or allowing them (e.g.: the area between the parking lot and surrounded by trails at Fort Funston being proposed for the only off-leash access. It is an area that no one plays in now! People walk across it to get to the trail from the parking lot!). I've written a thousand letters in my head, but found that the anxiety that went along with contemplating the draconian changes that the Park Service has proposed made it impossible to actually continue to participate in a meaningful way with groups that are working very hard to make proposals that will work.

Thank you for your attention to this matter! What a time to assume the role of Superintendent!

Sincerely, Anne Farrow

Correspondence ID: 4640 **Project:** 11759 **Document:** 38106

Received:

May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence :

Overview

This is my public comment related specifically to San Mateo County for the 2011 GGNRA Draft Dog Management Plan. This document includes site specific analysis and suggestions for each on the San Mateo County sites plus general analysis and suggestions. I am opposed to ALL of the DEIS "ACTION alternatives" that would reduce or eliminate dog recreation at any site and any compliance rules that could ban dogs based on regulatory violations alone and not require public comment.

We, GGNRA dog people, are living the National Park Service's Healthy Parks Healthy People US philosophy which First Lady Michelle Obama's emphasizes in her "Let's Move" initiative. The Park Service in their own words emphasizes why active, moving dog recreation is so critical to the Bay Area's health and well-being. I fully agree with the Park Service statement: "The fundamental value of nature as integral to our health as a species is one of the precepts underlying the establishment of the national park system. As

Director Jarvis pointed out in a recent speech at the Harvard School of Public Health, the connections between personal health and parks have been evident since public parks were conceived in the 17th century. A growing body of research has documented the significant health benefits of time spent in nature and exercising outdoors. While certainly not a panacea, parks have the potential to play a major role in addressing the nation's current health crisis reflected in the alarming increase in heart disease, diabetes, and obesity."

With the DEIS, the Park Service is ignoring the benefits of dogs encouraging people (including local families, seniors and minorities) to get out twice a day in the parks with our canine companions. Instead of demonizing our family dogs, the Park Service should be commending the Bay Area dog people and using them as a role model for other communities on how to encourage healthy, active living and getting out daily for long walks in the park and connecting with nature and our community.

Certainly the long trails in San Mateo County are well suited to daily exercise. However, San Mateo County has been denied voice control options in traditional off-leash recreation areas without any environmental impact study to evaluate the effects on public health and safety. Both San Francisco and Marin have proven that voice-control dog recreation is safe and healthy for an urban population, and San Mateo County should be provide the same privileges in our local urban recreation areas instead of having to drive to San Francisco or Alameda county to legally enjoy this daily recreational activity. In addition, providing legal voice-control areas would reduce the unnecessary citations and law enforcement efforts and more equally disperse the high visitation at Fort Funston and Stern Grove caused by San Mateo County residents.

Note that San Mateo County GGNRA sites are not normally crowded and have high visibility for approaching pedestrians, equestrians, and bicyclists; this enables easier management of voice-control dogs and minimizes any potential conflicts. In summary my suggestions is to honor the "1979 Pet Policy" and add additional voice-control areas for lands added after 1979. The revised policy needs to be formally incorporate into the NPS regulations and illuminate any question about it's acceptability. In addition, I specifically suggest:

? Encourage people to walk with their dogs and get healthy and safe exercise and enjoyment ? Eliminate the compliance-based management strategy ? Regulate professional dog walking using best practice guidance provided by entities such as the SFSPCA and Marin Humane Society and local dog walking regulations ? Provide voice-control dog walking options in San Mateo County sites and new lands ? Improve safety measures such as poison oak removal on trail beds, signage, etc. ? Improve feces collection with signage, bags, and an awareness campaign ? Monitor Park Service success in

regards to the recreational value and to sound land use management ? Provide awareness/training programs in conjunction with organizations such as the humane societies to improve both recreation and safety The Park Service Should Encourage Not Discourage Responsible Walking with Dogs

The relatively high illegal voice-control dog walking in San Mateo County GGNRA sites and the high usage of Fort Funston by San Mateo residents is representative of the high desire for such recreational opportunities in the county. Instead of trying to suppress responsible on-leash and voice-control dog walking, the Park Service should embrace it as a way to encourage healthy exercise, community building, and responsible dog ownership. Instead of spending money on increased law enforcement and litigation that is alienating a large group of people that love the outdoors and nature and will discourage visitors with dogs, the Park Service should become the national leader in studying the true impact of dog recreation on nature and on other park users and how to best manage the adverse impacts and maximize the benefits, particularly the public health and safety benefits. As the only park in the National Park System that allows any dog recreation, other than hunting with dogs, the GGNRA is uniquely positioned to provide a great service to the US and the world in providing real insights on the impacts and management of dog recreation. I believe this DEIS process represents a unique opportunity for the Park Service to demonstrate that they are indeed listening to the public comments and to build a stronger relationship with the community.

The Compliance-Based Management Strategy Must Go

A dog management plan should not come with a built-in nuclear option, which is what this is. It immediately undermines any belief that the Park Service is working with the public to design programs that meet the needs of the public and instead gives the Park Service a heavy-handed way to exclude the public without due process. It would allow even a few bad players to be used to destroy our traditional recreational use of the area. It circumvents the legal requirement that management changes that are either significant or controversial must have a public process before they can be made. Critical information about how compliance will be determined - by volunteers biased against dogs? by surveillance cameras? - is not included in the DEIS. San Mateo County is Unfriendly to People with Dogs - particularly those that enjoy voice control hiking and play

Consolidated Suggested Balanced Dog Recreation Plan for San Mateo County

Park Unit: Mori Point Voice Control: All other trails On Leash: On the trails surrounding the frog ponds and along city traffic routes No Dogs: No Dogs

None

Nearby San Pedro Valley Park does not allow any dogs. The adjacent Sharp Park and Rockaway Beach trails all have a high concentration of voice control dogs and all these areas have traditionally been under voice control. So it would be difficult for someone to get a no dog experience even if these trails were designated as no dog.

Milagra

There is no scientific evidence indicating that dog recreation, on-leash or by voice-control, has any significant impact on visitors or the natural environment. I'm simply designating this as on-leash to provide for balanced recreation for the few people that desire to avoid dog interaction.

-None, except consider a two hour morning and two hour evening time window to meet the needs of local residents -All on-leash -None Notch Trail, Sawyer Camp Trail and San Bruno Mountain are all in the nearby area and do not allow dogs. The park trail system criss-cross and there is little advantage to designating no dog trails as dog would still be nearby and crossing a fearful person's path.

Sweeney Ridge

Allows balanced areas for dog recreation plus one trail for no dogs even though overall visitation on the "no dog" trail will probably be less because of not allowing dogs. While there is no evidence of dogs impacting the Mission Blue Butterfly, Notch Trail includes the habitat for the butterfly so even remote impacts are eliminated. -Trails from Sneath Lane entrance to Fassler entrance and dirt trails south of that path (plus Cattle Hill and road to the Nike Missile Site) -Trail from the Shell Dance Nursery to the Nike Missile Site -Notch Trail

Note that on the Bay side nearby Sawyer Camp Trail and San Bruno Mountain do not allow any dogs. On the Coast side nearby San Pedro Valley does not allow dogs. I doubt there is a significant number of visitors that are truly afraid of dogs that will visit Sweeney Ridge because of the large, wild predators in the park New lands - e.g., Rancho Corral de Tierra

Provide dog recreation based on traditional usage, recreational demand and sound land management practices that achieve the GGNRA mandate. In addition to providing voice control, also provide designated recreational play areas, if feasible, to allow for fetch and other dog sports Note almost all the open spaces on the coast do not currently allow dogs and, if they do, the dogs must be on leash. This increases the need for the GGNRA to provide voice-

control and dog play areas for dog recreation.

Pedro Point I am not as familiar with Pedro Point and the local needs so my suggestion is tentative and purely based on trying to provide balanced areas for voice-control, no dogs, and leashed dogs. -None -Any connecting routes through the park -Most of Pedro Point except as defined

Mori Point Analysis and Suggestions

Overall Assessment

All adverse impacts shown for Mori Point for the "No Action" alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Mori Point since there is no scientific evidence or even reasonable correlations that dogs are more than negligibly impacting the park and particularly not the protected California Red-Legged Frog or the San Francisco Garter Snake.

I oppose all of the DEIS "action alternatives" as they represent "hoarding" by marginalizing the recreational mandate for the GGNRA and the recreational needs of an urban population and future generations. I support adding voice-control trails, one no dog trail, and adding other more inclusive solutions to improve dog recreation at Mori Point as defined below. Note that Sharp Park to the north and the Rock Quarry to the south are both heavy dog use areas, with many dogs off-leash. Access for dogs from the Pacifica residences must be maintained from the northeast as well. This is not a location that anyone with a significant fear of dogs would frequent.

Recommended Changes to the "No Action" Current Dog Management Plan

Establish voice control trail access for Mori Point Suggested Balanced Option

Voice-Control Allowed: All trails except for near frog ponds and along city traffic

On-leash Only: All trails near frog ponds and along city traffic

No Dogs: ? Enclosed pond areas ? Upper Mori Trail

Logic behind trail selection:

There is a high recreational demand for voice-control dog recreation as evidenced by the traditional usage and by the high rate of non-compliance with leash laws both on GGNRA and Pacifica park areas. Requiring leashes in certain areas provides areas for those that don't want any interaction with dogs and encourages voice-control dogs to use other trails. I assume the anti-

dog-recreation people are most interested in the conservation areas around the ponds, so those are the areas selected for leash control plus the upper Mori Point trail would reduce any dog interactions with the dispersal areas from the pond. It is most importantly to provide an active path over the hill for those that want to walk or jog with their dogs using voice control from the north to south. It is also important to provide at least an on-leash path directly from the residential area to Sharp Park and Mori Point.

Benefits: 1) See Voice Control Benefits for San Mateo County 2) Mori Point is in large residential areas that are most likely to use the trails on a daily basis and to invest the time and effort in socializing, exercising, and training their dogs as well as benefit the most community camaraderie in the parks. I keep hearing people say that they purchased a house in the area because it seems like a good place to have dogs.

Comments:

1) On the other hand, the traditional use of Mori Point was for voice-control dog recreation and the current leash law violations support that there is a high demand for voice-control dog recreation. People are forced to drive to the San Francisco or to the East Bay to enjoy legal off-leash dog trails. Formal voice control rules need to be established for Mori Point to support this recreational need.

2) Considering this is likely the highest visitation park in San Mateo County, there is no reasonable justification for deeming that dog recreation has more than a negligible impact and attributing all general visitation issues to dog recreation. The biggest issue at Mori Point is the erosion caused by off-trail climbing of the hill. I have never seen a dog going up that hill but have seen several people climbing to the top of the hill. Dogs would not be going up that hill unless accompanied by a person and would not be causing the same level of damage as the heavier hikers with hiking boots. 3) There is no reasonable justification for denying San Mateo County to have voice control areas.

? The DEIS provides no scientific evidence that dogs are causing more than negligible environmental adverse impacts on Mod Point, particularly that dogs impact protected species such SF Garter Snake or the California Red-Legged Frog. Please see discussion below regarding these species. ? Per my FOIA to the Park Service, there is no GGNRA testing or inventories to provide any evidence that dog negatively impact the Mod Point natural environment so the only available indication is anecdotal observations and that doesn't indicate any adverse impacts from dogs. ? Other than 130 leash law violations from 2001 to 2010, there were almost no dog-related law enforcement issues on Mod Point; no wildlife disturbance, just 2 dog "bite/attacks", one cliff rescue ('04) and one "pet" related complaint. Mod

Point was traditionally and continues to have high voice-control use. All available information supports that our companion dogs, either on-leash or by voice control, have a negligible impact on wildlife in this park. ? The DEIS on page 273 is understating the dog visitation at Mod Point, as with other parks, by stating that visitors with dogs moderate (10-30%). Based on my experience, at least 1 in 3 visitors is accompanied by a dog on Mod Point but it varies by day and time. Note that based on the GGNRA visitorship methodology they are ignoring San Mateo County site visits and the "Visitor Use" measurement based on crowding provides little insight on the number of people that rely on this park for daily exercise and enjoyment. ? Per the response to my FOIA request, there was never an environmental impact study conducted to justify removing or changing traditional voice-control access for Mod Point when it was acquired by the GGNRA. ? I'm not able to determine the area that dogs potentially impact because I don't know the park acreage but I assume it is comparable to Sweeney at an estimated 0.5% of the park area. There is no evidence that dogs are more than negligibly impacting this park's natural environment, particularly not cumulatively that will impact future generations. In the last five years of actively hiking on Mod Point a few times a month my observations are:

a. Never seen any problem interactions between dogs and none between dogs and people. In addition, I have never seen a dog off the trail beds more than 10 feet and rarely see them off the trail because people and dogs are actively moving forward. b. Potentially disturbing sensitive seedlings in the bare ground native plant restorations right on the trail beds is the biggest potential impact from dog recreation under the current plan. Before banning or requiring leashes, the Park Service should use temporary barriers or seedling protections that would be effective in a wilderness setting with large mammals such as deer, elk, coyotes, and bears. I've only casually observed these restoration project but I expect last year's lack of rainfall, slope, and ground preparation/nutrients are a bigger issue than a rare dog walking in the beds right next to the trail. All my life, I've seen dogs in gardens and yards and never observed trampling damages just some caused by active digging, which I've never seen at Mod Point. c. Visitors are pretty disbursed on Mod Point so it is relatively easy for one to call and prevent voice- controlled dogs from interacting with pedestrians and on-leash dogs. I've never seen a horse or evidence of horse activity at Mod Point so that is virtually a non-issue. Visibility is good and trails are not made for high speeds so bicycles are also virtually a non-issue. d. The vegetation shows no signs of trampling, digging, social trails, or bare spots caused by dogs. e. Dogs have no impact on the wildlife at Mod Point and the adjacent open spaces, which are surrounded by residences, Highway 1, a shopping center and the ocean. The Park Service would have to actively re-establish deer or other large mammals in zoo like condition in a relatively small space. Coyotes have been spotted in this high visitation park but aren't normal residents. Birds, based on the park soundscapes, are certainly prolific in the park as are reptiles and small

mammals. Per the response to my FOIA, no inventory or monitoring of wildlife has been performed for Mori Point to provide any evidence of wildlife impacts. f. Also, see below for sections on San Francisco Garter Snake, California Red-Legged Frog, Soil/Vegetation, and Wildlife regarding the lack of evidence that dog recreation is causing any credible impact.

? The GGNRA has not conducted any testing to comprehensively evaluate the recreational barriers and needs of people. However, logically, Mod Point is not a place that people that are afraid or dislike of dogs are likely to go or want to go regularly because of the high use of surrounding Spark Park and the Rock Quarry for off-leash dogs. While it is likely that people choose to live in the adjacent neighborhoods because of the availability of nearby dog recreation; it is much less likely that people with intense dog fears/dislikes would choose this neighborhood and actively use Mod Point for hiking.

? Install bigger signs and conduct a campaign (similar to leave no trace) to encourage irresponsible people with dogs to pick up. See Leave No Dog Trace below. Mod Point in general has more litter, including dog litter, than other San Mateo County park trails. I assume this is because of the higher usage and would benefit the most from an active campaign.

? Install bigger signs at ALL entrances and trail junctions indicating dog rules for the specific area. See Dog Rule Trail Communication below.

? Implement voice-control awareness/training programs, in cooperation with organizations like the SPCA, to help minimize the few dog issues. Note that, if necessary, reasonable fees should be charged for the programs but there should also be options for low income individuals. See Awareness/Training Programs below.

? Monitor park visitation, conduct visitor surveys, and implement land use practices to evaluate how successful the GGNRA is in maintaining the Recreation and land management mandate at Mod Point. See Monitoring Success Related to Park Mandate below. Sweeney Ridge/Cattle Hill Analysis and Suggestions Overall Assessment

All adverse impacts shown for Sweeney Ridge for the "No Action" alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Sweeney Ridge or the adjacent Cattle Hill that is supported by scientific evidence or even reasonable correlations. Note Sweeney Ridge/Cattle Hill is a wildlife haven after decades of dog recreation and not a trail system that most people that fear dogs would choose considering that mountain lions and bobcats live in this haven.

I oppose all of the DEIS "action alternatives" as they represent "hoarding" by

marginalize the recreational mandate for the GGNRA and the recreational needs of an urban population and future generations. Other than the Mission Blue Butterflies habitat near the Notch Trail entrance, which is miles from the other trails, there is no evidence that protected species even exist in this park. For the Mission Blue Butterfly, there is no reasonable correlation that dog recreation would have any more than negligible impact on the habitat, particularly since the habitats is fenced. I support adding voice-control trails and adding other solutions to improve dog recreation at Sweeney Ridge/Cattle Hill.

Recommended Changes to the "No Action" Current Dog Management Plan

? Establish voice control trail access from Bay side to the Coast side
Suggested Balanced Options

Voice-Control Allowed: Trails from Sneath Lane entrance to Fassler entrance and dirt trails south of that path (plus Cattle Hill and road to the Nike Missile Site) - If this is not possible due to the SF Watershed Easement agreement then Sweeney Ridge should remain an on-leash trail and Notch Trail should become a voice control option.

On-leash Only: Trail from the Shell Dance Nursery to the Nike Missile Site

No Dogs: Notch Trail - If this is not possible for Sweeney Ridge to have voice-control due to the SF Watershed Easement agreement then Notch Trail should become a voice control option.

Logic behind trail selection:

Allows balanced areas for dog recreation plus one trail for no dogs even though overall visitation on the "no dog" trail will probably be less because of not allowing dogs. Even though there is no evidence of dogs impacting the Mission Blue Butterfly, Notch Trail also includes the habitat for the butterfly so even remote impacts are completely eliminated by designating this as a no dog trail.

Benefits: 1) See Voice Control Benefits for San Mateo County 2) Voice Control entrances are in large residential areas that are most likely to use the trails on a daily basis and to invest the time and effort in socializing, exercising, and training their dogs as well as benefit the most community camaraderie in the parks.

Comments: 1) All adverse impacts shown for Sweeney Ridge for the "No Action" alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Sweeney Ridge that is

supported by scientific evidence or even reasonable correlations.

2) The DEIS "Preferred Alternative" ignores that the Sweeney Ridge Sneath Lane entrance is the only Bay-side entrance in San Mateo County to the GGNRA for people with dogs. The Sneath Lane trail is a fire road with several maintenance trucks a day and surrounding by dense vegetation and steep sides where even a poorly behaved dog has little opportunity to go off-road. There is no even remote justification to exclude dog recreation from Sneath Lane.

3) The traditional use of Sweeney Ridge was for voice-control dog recreation and the current leash law violations support that there is a high demand for voice-control dog recreation. People are forced to drive to the San Francisco or to the East Bay to enjoy legal off-leash dog trails.

4) Considering the negligible impact of hikers, with or without dogs, on just an estimated 0.5% of the Sweeney Ridge/Cattle Hill area and the extreme conservation of the huge SF Peninsula Watershed with a similar natural environment, there is no reasonable justification for constraining dogs to the roads and not allowing them, along with their people, to go on the trails in this park. All of the DEIS "action alternatives" represent "conservation hoarding" by marginalize the recreational mandate for the GGNRA and the recreational needs of an urban population and future generations.

5) There is no reasonable justification for denying San Mateo County to have voice control areas. ? The DEIS provides no scientific evidence that dogs are causing more than negligible environmental adverse impacts on Sweeney, particularly that dogs impact protected species such as the Mission Blue Butterfly, SF Garter Snake, or the California Red-Legged Frog. Please see discussion below regarding these species. ? Per my FOIA to the Park Service, there is no GGNRA testing or inventories to provide any evidence that dog negatively impact the Sweeney Ridge natural environment so the only available indication is observation and that doesn't indicate any adverse impacts from dogs. ? Other than leash law violations from 2001 to 2010, there is almost no dog-related law enforcement issues on Sweeney; this includes no wildlife disturbance, no "bite/attacks", and no dog related complaints ? Sweeney Ridge was traditionally and continues to have high voice-control use, and after 30 years is still a "wildlife haven" even per rangers in the 2007 to 2008 ranger tickets. There is no visible evidence of natural environment adverse impacts from dog activity. Even per the rangers, the area is rich with wildlife such as deer, birds, deer, bunnies, bobcats, and mountain lions. Based on personal observation, the wildlife has habituated to the current recreational activities, including voice control dogs. Also, there is no scientific evidence to the contrary. ? There was never an environmental impact study conducted to justify removing or changing traditional voice-control access for Sweeney Ridge when it was acquired by the GGNRA. The

environmental impact study didn't even mention dog recreation so the voice-control rules should remain the same of the traditional use. ? Based on a rough estimate, the trails and trail bed that currently allowed to dogs represents about 0.5% of the 23,000 acre Sweeney Ridge that borders on the huge SF Peninsula Watershed. There is no evidence that dogs are more than negligibly impacting this park, particularly not cumulatively that will impact future generations. a. In five years of actively hiking on Sweeney Ridge almost daily, I've only seen one dog, a new rescue, that took off into the dense scrub and have never seen any more than negligible problems between dogs and none between dogs and people. Per the law enforcement data from 2001 to 2010, there was only one search and rescue and no wildlife disturbances reported. All available information supports that our companion dogs, either on-leash or by voice control, have a negligible impact on wildlife in this park. b. On all Bay-side roads and trails, the vegetation is dense and poison oak filled and the roads/trails cuts up the hill which makes off-road dog travel risk almost zero. There is no visible evidence that dogs impact wildlife, vegetation or soil , other than a few dog feces that routinely gets picked up by another dog owner. My family and others pick it up on a routine basis, and I estimate about 5% of dog owners are negligent and would benefit from a poop collection campaign. c. On the Coast-side roads and trails, the vegetation is less dense but dogs rarely leave the trail bed and only for a short distance. There is no visible evidence that dogs impact wildlife, vegetation or soil; other than a few nuisance dog feces that generally get picked up by another dog owner. There is no evidence that dog feces or urine has degraded the soil on Sweeney during the past 30 years and claims are purely speculative. d. This is not a high visitation park so it is relatively easy for one to call and prevent voice-controlled dogs from interacting with pedestrians and on-leash dogs. The biggest risk is bicyclists that pick-up speed coming down the hill that has sharp turns but that is just as big a problem for hikers, children, and other bicyclists as for dogs. I've never seen a horse on Sweeney Ridge and only a few horse piles off the Fassler entrance so that is virtually a non-issue. Particularly on the trail from Fassler, where horses seem more common, there is high visibility so people have great opportunity to call their dog and avoid any possibility of a conflict. e. The DEIS on page 271 is understating the dog visitation at Sweeney Ridge, as with other parks, by stating that visitors with dogs is low (<10%) to moderate (10-30%). Based on my experience at the Fassler, Sneath Lane, and Shell dance entrances, at least 1 in 3 visitors is accompanied by a dog but it varies by day and time. Note that based on the GGNRA visitorship methodology they are ignoring San Mateo County site visits and the "Visitor Use" measurement based on crowding provides little insight on the number of people that rely on this park for daily exercise and enjoyment. f. The vegetation shows no signs of trampling, digging, social trails, or bare spots caused by dogs off the roads and trails. Dogs may cause some negligible additional disturbances along the trail beds but there is nothing that can be identified as being specific to dog activity. It is highly unlikely that the few inconsequential paths cut off the

main trails are caused by dogs and not by hikers, ranger activity, or equestrians. The GGNRA has complete no scientific studies to support any conclusions that dogs cause any impacts on the soil or vegetation, and it isn't reasonable to consider these impacts more than inconsequential. g. Claims of dogs impacting the migratory paths of wildlife are purely speculations and not based on any scientific evidence particularly considering that these trails and roads are actively used by park trucks, water trucks, hikers, bicyclists, etc. Deer and mountain lions cross highways and co-exist in lands with other animals and predators; a dog accompanying a hiker is unlikely to cause anymore delay than a lone hiker, particularly considering that few people or dogs are on these trails in the early morning, night, and at dusk. The plethora of wildlife on Sweeney and the adjacent watershed areas provides no evidence that wildlife are being impeded. If anything the dense foliage on the Bay side, likely caused by suppressed fire management, impedes wildlife movement and limits suitable habitat for ground birds such as quail. h. See below for sections on San Francisco Garter Snake, California Red-Legged Frog, Mission Blue Butterfly, Soil/Vegetation, and Wildlife regarding the lack of evidence that dog recreation is causing any credible impact.

? The GGNRA has not conducted any testing to comprehensively evaluate the recreational barriers and needs of people. However, logically, Sweeney Ridge is not a place that people that are afraid of dogs are likely to ' go or want to go regularly. They would perceive Sweeney Ridge as a truly a natural, high-risk setting with only a dirty portable toilet on top, and it is home to mountain lions, bobcats, and coyotes. Few people that are afraid of a dog are going to venture deep onto these trails with no amenities when there are so many nearby trails with little chance of any big animal sightings such as Mori Point, Sawyers Camp Trail, and San Bruno Mountain. They also have cleaner bathrooms and facilities.

? Install downhill pedestrian warning signs on the Sneath Lane trail that warn drivers and bicyclists to slow down around curves Benefit: Make drivers and bicyclists more cautious about picking up speed, particularly in blind curves, where they could hit a hiker, child, dog, bike, car, etc.

? Also provided holders so that people can provide feces bags to encourage other people to collect feces. See Leave No Dog Trace below.

? Install bigger signs and conduct a campaign (similar to leave no trace) to encourage irresponsible people with dogs to pick up the feces (particularly at Sneath Lane where there are no signs). See Leave No Dog Trace below.

? Install bigger signs at all entrances and trail junctions indicating dog rules for the specific area. See Dog Rule Trail Communication below.

? Routinely have trail maintenance volunteers or crews remove poison oak

near the trail beds. See Poison Oak Safety Issue below.

? implement a dog voice-control awareness/training programs, in cooperation with organizations like the SPCA, to help minimize the few dog issues. Note that, if necessary, reasonable fees should be charged for the programs but there should also be options for low income individuals. See Awareness/Training Programs below.

? Monitor park visitation, conduct visitor surveys, and implement land use practices to evaluate how successful the GGNRA is in maintaining the Recreation and land management mandate at Sweeney Ridge. See Monitoring Success Related to Park Mandate below.

? Work with the City of San Bruno or other responsible entities to address the on-going dumping and car vandalism problem at the Sneath Lane entrance. a. We've been going to the Sneath Lane entrance almost daily for 5 years. It seems like at least 3 or 4 times a year there is broken windshield glass covering the parking area. In addition to the property damage, it is a safety issue for all people, including those with dogs, and for dogs. Once I slid on the glass and sliced my hand and knee during the fall, and dogs are also likely to get the glass fragments in their paws. These injuries were far worse than almost all of the dog "bite/attack" injures described in the 2007-2008 ranger tickets and are a much greater risk to public safety on Sweeney than companion dogs. Particularly since there were no reported dog bites on Sweeney and that almost all "bite attacks" were non-injuries or minor scrapes or bruises in other SF and Marin parks; also, the CDC declared the US canine-rabies free.

Milagra Ridge Analysis and Suggestions

Overall Assessment

All adverse impacts shown for Milagra Ridge for the "No Action" alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Milagra Ridge that is supported by scientific evidence or even reasonable correlations.

I oppose all of the DEIS "action alternatives" as they represent "conservation hoarding" by marginalize the recreational mandate for the GGNRA and the recreational needs of an urban population and future generations. I support adding voice-control trails and adding other solutions to improve dog recreation at Milagra.

Recommended Changes to the "No Action" Current Dog Management Plan

Allow voice control trail access Suggested Balanced Options

Voice-Control Allowed: All trails, due to the nature of the trail system there is no reasonable method to create separate areas On-leash Only: None.

No Dogs: None

Logic behind trail selection:

There is no evidence of dogs impacting the Mission Blue Butterfly (MBB) or its habitat; therefore, dogs should be allowed on all trails, as they are today, unless scientific studies provide substantial evidence that dogs are causing significant harm to the MBB species.

Benefits: 1) See Voice Control Benefits for San Mateo County 2) Milagra Ridge is adjacent to apartment complexes and several housing residences are nearby 3) The scenic San Andreas Fault trail system and San Bruno Mountain trail systems do not allow dogs

Comments: 1) Traditional use of Milagra Ridge was for voice-control dog recreation and the current leash law violations support that there is a high demand for voice-control dog recreation. People are forced to drive to the San Francisco or to the East Bay to enjoy legal off-leash dog trails.

2) There is no reasonable justification for denying San Mateo County resident voice control areas. The DEIS provides no scientific evidence that dogs are causing more than negligible environmental adverse impacts on Milagra Ridge, particularly that dogs impact protected species such as the Mission Blue Butterfly, SF Garter Snake, or the California Red-Legged Frog. Please see discussion below regarding these species.

3) Per my FOIA to the Park Service, there is no GGNRA testing or inventories to provide any evidence that dog negatively impact the Milagra Ridge natural environment so the only available indication is observation and that doesn't indicate any adverse impacts from dogs.

4) Other than 65 leash law violations from 2001 to 2010, there were almost no dog-related law enforcement issues on Milagra Ridge; this includes no wildlife disturbance, 1 "bite/attacks", and 2 other unspecified "per incidents. These do not represent a significant impact on the environment or other park users.

5) Milagra Ridge was traditionally and continues to have high voice-control use. There was never an environmental impact study conducted to justify removing or changing traditional voice-control access for Milagra Ridge

when it was acquired by the GGNRA.

6) The DEIS on page 273 is understating the dog visitation at Milagra Ridge, as with other parks, by stating that visitors with dogs is low (<10%) to moderate (10-30%). Based on my experience at least 1 in 3 visitors is accompanied by a dog but it varies by day and time. Note that based on the GGNRA visitorship methodology, the Park Service is ignoring San Mateo County site visits and the "Visitor Use" measurement based on crowding provides little insight on the number of people that rely on this park for daily exercise and enjoyment.

7) I'm not able to determine the area that dogs potentially impact because I don't know the park acreage but I assume it is comparable to Sweeney Ridge at an estimated 0.5% of the park area. There is no evidence that dogs are more than negligibly impacting this park's natural environment, particularly not cumulatively, that will impact future generations. In the last five years of actively hiking on Milagra Ridge a few times a year and more closely observing the park over the past few months:

- Most trails are enclosed by cable fencing and the vegetation is poison oak filled which makes off-road dog travel risk almost zero. There is no visible evidence that dogs impact wildlife, vegetation or soil; other than a few nuisance dog feces that generally gets picked up by another dog owner. There is no evidence that off-path dog travel creates bare patches, dog feces or urine has damaged the soil or vegetation on Milagra Ridge. The claims are purely speculative and not supported by observable evidence or scientific evidence.
- This is not a crowded park so it is relatively easy for one to call and prevent voice-controlled dogs from interacting with pedestrians and on-leash dogs. I've never seen a horse on Milagra Ridge, and it isn't a likely destination for equestrians.
- The vegetation shows no signs of trampling, digging, social trails, or bare spots caused by dogs. Dogs may cause some negligible disturbances along the trail beds but there is nothing that can be identified as being specific to dog activity. It is highly unlikely that the few inconsequential paths cut off the main trails are caused by dogs and not by hikers and ranger activity. The only visible trampling I've seen seems to be trampling that appeared to be caused by volunteers or rangers marking native plant specimens with flags or removing invasive plants.
- See below for sections on San Francisco Garter Snake, California Red-Legged Frog, Mission Blue Butterfly, Soil/Vegetation, and Wildlife regarding the lack of evidence that dog recreation is causing any credible impact. ? The GGNRA has not conducted any testing to comprehensively evaluate the recreational barriers and needs of people. However, logically, Milagra Ridge is not a place that people that are afraid of dogs are likely to go or want to go regularly, with or without dog recreation. They would perceive Milagra Ridge as a truly a natural, high-risk setting with only a dirty portable toilet. It is also home to at least bobcats and coyotes. Few people that are afraid of a dog are going to venture deep onto these trails with no amenities when there are so many

nearby trails with little chance of any big animal sightings such as Mori Point, Sawyers Camp Trail, and San Bruno Mountain. They also have cleaner bathrooms and facilities. ? Also provided holders so that people can provide feces bags to encourage other people to collect feces. See Leave No Dog Trace below. ? Install bigger signs and conduct a campaign (similar to leave no trace) to encourage irresponsible people with dogs to pick up the feces (particularly at Sneath Lane where there are no signs). See Leave No Dog Trace below. ? Install bigger signs at all entrances and trail junctions indicating dog rules for the specific area. See Dog Rule Trail Communication below. Milagra Ridge actually has the best educational signage I've seen on the GGNRA trails systems (e.g., large and spread throughout the park) that I've seen and the style should be a model for other parks to consider. ? Routinely have trail maintenance volunteers or crews remove poison oak near the trail beds. See Poison Oak Safety Issue below. Milagra Ridge foot trails often have poison oak branches/leaves hanging into the pathway. These are a danger to people and particularly any child that is walking on the path. There is also a high likelihood that a dog will brush against the leaves/branch and the resin will be transferred to people. ? Implement a dog voice-control awareness/training programs, in cooperation with organizations like the SPCA, to help minimize the few dog issues. Note that, if necessary, reasonable fees should be charged for the programs but there should also be options for low income individuals. See Awareness/Training Programs below. ? Monitor park visitation, conduct visitor surveys, and implement land use practices to evaluate how successful the GGNRA is in maintaining the Recreation and land management mandate at Sweeney Ridge. See Monitoring Success Related to Park Mandate below.

Pedro Point Analysis

Overall Assessment

All adverse impacts shown for Pedro Point for the "No Action" alternative need to be changed to no impact or negligible. There is no reasonable justification for reducing dog activity on Pedro Point that is supported by scientific evidence or even reasonable correlations.

I am not highly familiar with Pedro Point and have only hiked there once several years ago. I believe Pedro Point may be a reasonable site for "No Dog" other than connector trails through the park. However, these would need to be determined based on the needs of the local residents. There is no justification for excluding dogs based on natural environment or protected species impacts provided in the DEIS. Please see the discussion of San Francisco Garter Snake, California Red-Legged Frog, Hickman's potentilla, Soil/Vegetation, and Wildlife below. This small park area is enclosed by highway 1, the ocean, and residences, no large mammals are unlikely to even enter the area and there is no evidence that voice-controlled or leash

controlled dogs would impact the wildlife populations any more than at other low visitation, trail areas. As for the protected species, there is no evidence that dogs would impact the species that don't even currently exist at the site even if they did exist. In particular, the Hickman's potentilla has never been known to exist at this site and is non-native to the area and should be removed from the impact statements completely.

Similar signage, training, and awareness programs should be implemented for Pedro Point as for other GGNRA park trail systems. General Non-Site Specific Suggestions & Comments

Recreation Mandate

According to the GGNRA enabling legislation, recreation is a mandate of the GGNRA and needs to be enabled for an urban population. Based on the 2002 Population Survey performed by the GGNRA, walking dogs is a high value recreational activity enjoyed by 15% of Bay Area Residents which is some 450,000 people based on the 2008 US Census Data. In addition, at least 1 in 3 people have dogs in America so there is an even greater opportunity to encourage people to enjoy this healthy and safe recreational activity. All indications are that walking a dog is one of the most in demand recreational activities in the GGRNA, particularly in urban communities bordering on the GGNRA lands; and the Park Service has provided no evidence that dog walking is not one of the most in demand recreational activities in the GGNRA. In addition, tourists that travel with their dog need opportunities to enjoy the outdoors with their dogs.

The GGNRA in the DEIS and in public presentation about the plan has treated people with dogs as a nuisance instead of an important group of recreational users of the park. The Park Service continues to imply to the public that dog recreation is illegal even though two federal judges have upheld the 1979 Pet Policy and the Park Service has the ability to amend their regulations to be more directly tolerant to dog recreation activities. Their pet regulations are arbitrarily defined by the Park Service and are not laws but Park Service written regulation. At this point after review all the evidence available to me, the Park Service leadership seems highly biased against dog recreation and is pushing their personal biases to marginalize recreation by providing exaggerated, misleading, and speculative evidence instead of unbiased scientific evidence. The Park Service is attempting to do "conservation hoarding" and exclude necessary urban recreation for which this park was established.

Biased DEIS Representations

As an example of a biased representations that demonstrates the Park Service's intolerance for dog recreation, several impact statements for wildlife

in the coastal scrub areas are rated as moderate and imply that dogs are preventing healthy wildlife populations without any scientific basis for the moderate or even minor ratings. The law enforcement data doesn't indicate a single wildlife disturbance in the San Mateo County parks in 10 years and even if there were that seems inconsequential in the big picture of the GGNRA enabling legislation or real wildlife conservation.

The Park Service is trying to marginalize or eliminate low impact dog recreation when more than 60 other parks in the National Park system allow hunting because of their enabling legislation as shown in the attached: Example of Enabling Legislation Allowing Hunting - A significant wildlife disturbance and >60 National Park Service Ran Parks Allow Hunting In addition, fishing and equestrians are allowed in National Parks units including the GGNRA, snowmobiling is allowed in Yellowstone, and off-road vehicles in some other parks. All have a much greater impact, particularly my individual recreational user, than walking a dog. In Yellowstone, the Park Service conducted extensive research on the impacts of snowmobiles while only conducting almost no unbiased studies regarding dog recreation in the GGNRA, even though the proposed dog management plan impacts hundreds of thousands of people's daily lives and undermines the recreational mandate of the park.

In addition, the National Park Service itself is currently studying the effects of habituation as outlined in this article on the Perspectives on Human Dimensions of Wildlife Habituation:
http://www2.dnrcornell.edu/wtolerance/documents/workshop_report.pdf

There is no reason to assume that wildlife is any less likely to habituate to dog recreation than other human activities, particularly after all these decades, and in fact, some minor dog interaction may be beneficial if wildlife are dissuaded from directly approaching humans. In fact, some people feel safer because a mountain lion or another person is less likely to attack them if they are accompanied by a dog and there is less potential for serious conflicts. The primary premise in the DEIS is that dogs are natural predators but the DEIS fails to mention that humans are also natural predators that wildlife would naturally avoid at some level. Fortunately, wildlife in these areas have had tens of thousands of years to adapt to human and canine activity and the current level of activity has been maintained for decades in San Mateo County without readily apparent impacts on overall wildlife populations.

Most parks in the National Park System allow fishing and some allow off-roading. All these activities fundamentally have a much greater impact on wildlife and vegetation than people walking with companion dogs that rarely even disturb wildlife or leave the trail beds. The DEIS also ignores that people passing wildlife flush the wildlife off the trail so the companion dog interactions just cause the wildlife to leave the trail sooner. In total, all the

dogs in the parks for a day probably have less of an impact than a single hunter or a single grizzly bear (native but now extinct in California) would have on the 80,000 acres in a day. Any more than negligible impact statement for wildlife from walking with a dog are completely exaggerated and taken out of context and demonstrates extreme biases. There seems to be no justification for this DEIS other than extreme prejudice against people with dogs by the Park Service that has manipulate and misrepresented information to achieve their desired goal of excluding people with dogs. The 25 percent compliance rule in and of itself demonstrates that the Park Service is intent on excluding all people with dogs over the next few years instead of working to resolve any real issues.

Benefits of Voice Control Areas for San Mateo County GGNRA Park Areas

1) Provides the NPS with an aid for the Healthy Parks Healthy People initiative since dogs encourage people to exercise more often and for longer distances plus facilitates healthy social interactions.

2) Encourages and provides for a high demand recreational activity that is healthy and encourages the at least 1 in 3 people with dogs, particularly those in the nearby neighborhoods, to take long daily walks in the outdoors. All these benefits contribute equally to children, seniors, people with disabilities, all incomes, all ethnic groups, etc. One of the greatest benefits of exercising in the GGNRA is that it is available to all; no matter their social-economic position and the GGNRA is one of the greatest benefits of living in the Bay Area.

3) San Mateo County has no reasonable voice control hiking options: a. Esplanade is not a reasonable substitute because it is not easily assessable by families or people with disabilities and does not offer a trail experience plus it seems more dangerous than other beaches in the area (aka the small beach area with no place to escape, riptides, etc.) I was only recently able to find Esplanade Beach and understand why it is not a beach that many people would want to frequent. Pulgas Ridge only has a small play area about 1/3 mile long in the middle of the longer on-leash trail system. In addition Pulgas Ridge is far from people on the San Mateo coast and northern part of the county and is not a reasonable location for daily exercise for these people. b. Fenced city dog parks (dog parks) are not trails and are not a substitute for an outdoor experience with a voice-controlled dog. Comparing dog parks to hiking trails is the equivalent of saying people don't need access to GGNRA hiking trails because there are children's playgrounds in city parks. All are important to our community but none are substitute for the other. Fenced city dog parks are an excellent resource but do not encourage adequate daily exercise for most people. In addition, Ella, like a child on a playground with other children, got a great workout playing with other dogs in dog parks when she was a puppy and adolescent. Now, she just stands around, particularly

since she isn't highly motivated by fetch. Hiking trails get both the people and the dogs moving. In addition, dog parks are too intense for many dogs that need more space to be comfortable and to avoid confrontations. 4) People receive mental health benefits (e.g., stress relief) from empathetically watching the joyful activities of their canine companions, from playing with their dog, and from socializing with others.

5) Facilitates the recreational experience for people with disabilities and families with small children that may have difficulty managing a leash along with other needs (e.g., a stroller, wheelchair, balancing, etc.)

6) Enables people to continue using dogs as a social facilitator since dogs, like small children, help bridge social barriers and often spark social exchanges that don't happen in the absence of a dog or some other social bridge

7) For most dogs (aka those without significant behavioral problems), leashes impede healthy social interactions and increase leash reactivity problems. If a dog is super motivated to meet other dogs and is constantly suppressed or given leash corrections, these frustrating interactions and corrections can lead to negative associations and real aggression. In addition, restraining a pulling-frustrated dog on a leash causes a body language that is associated with an aggressive stance and creates a dog-dog communication problem. Encouraging regular dog-dog greetings with friendly dogs helps create and maintain friendly dogs with good social skills and positive associations.

8) Voice-controlled dogs are more likely to be able to meet and greet which means that their people are more likely to have healthy social interactions, instead of actively avoiding each other on the trails. In my local neighborhood dogs don't meet and greet. Instead there is an elaborate crossing of streets to avoid each other because dogs either don't have social skills or you don't know that they do.

9) Facilitates people responsibly exercising, socializing, and training their canine companion which reduces dog behavior problems, makes for healthier and happier dogs, increases the human/canine bond, etc. All make for dogs that are safer when in public spaces, when at home (particularly around new babies, children and the elderly), if they escape onto the street, if they are abandoned in a shelter, etc.

10) Intensifies the canine/human bond because of the shared enjoyable experiences which reduces the abandonment of dogs to shelters or the inhumane treatment of dogs.

11) Provides remote areas that facilitate the training of dogs with behavioral

issues and/or training needs.

12) Legally allows people to participate in this highly enjoyable recreational activity without having to incur the personal costs and environmental costs of driving to San Francisco, the East Bay, or to places like the Tahoe National Forest.

13) Disperses the current high concentration of dogs recreation in legal off-leash places like Fort Funston to more balance the recreational impacts on the 80,000 acres and city parks.

14) Eliminates virtually all law enforcement activities related to dogs and improves relations with the dog community. Designating voice-control areas will reduce law enforcement costs and efforts that are currently wasted by the suppressive regulations that don't address the high demand for voice control dog-walking recreation

15) Provides local legal outlets that will encourage off-leash people to walk on these trails instead of the on-leash/no dog trails; therefore, people that dislike or are afraid of dogs will have even less negative encounters if they truly appreciate and self-select to use the "no dog" or on-leash trails

Visitor Experience & Public Health and Safety

Please see my public comment regarding Public Health and Safety.

Poison Oak Safety Issue ? Routinely have trail maintenance volunteers or crews remove poison oak near the trail beds

Benefit: Reduces the number of serious poison oak related rashes that people experience. I've personally had several experiences with brushing up against poison oak over the past 15 years that have severely incapacitated me for about a week. These poison oak incidents are far worse than all the 2007 or 2008 dog "bite/attacks" in the PDF except for the motorcycle/dog accident. Even if the dogs stay on the trail, they can brush against the poison oak and transfer the resin to people, even if the person avoided the branch.

Leave No Dog Trace

? Install bigger signs and conduct a campaign (similar to leave no trace) to encourage irresponsible people with dogs to pick up the feces (particularly at Sneath Lane where there are no signs). Also provided holders so that people can provide feces bags to encourage other people to collect feces.

Benefit: Helps educate the remaining dog owners that they shouldn't leave the

feces, even in the wilderness.

Dog Rule Trail Communication ? Install bigger signs at all entrances and trail junctions indicating dog rules for the specific area Benefit: Helps educate the remaining dog owners that they shouldn't leave the feces, even in the wilderness.

Monitoring Success Related to Park Mandate and Science Based Information

? Monitor park visitation, conduct visitor surveys, and implement land use practices to evaluate how successful the GGNRA is in maintaining the Recreation and land management mandate at San Mateo County Park Units. The GGNRA does not track visitation for San Mateo County nor evaluate performance related to achieving the GGNRA mandate of recreation or sound land management. The enabling legislation states "shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management."

? The Park Service in the GGNRA is not using sound land use practices to evaluate the natural environment to provide a scientific basis for managing recreational activities and ensuring that the park is maintained for the current and future generations. Based on the Park Service response to my FOIA request, the GGNRA has not conducted monitoring of these park units since the 1990s. Instead of relying on science, the Park Service is relying on dogma and personal biases to guide management plans that are detrimental to the recreational values of the park. The need for scientific monitoring is supported by the enabling legislation and the following NPS Policies 2006 excerpts:

4.1 "The Service will reduce such uncertainty by facilitating and building a science-based understanding of park resources and the nature and extent of the impacts involved."

4.1.1 "Similarly, planning for park operations, development, and management activities that might affect natural resources will be guided by high-quality, scientifically acceptable information, data, and impact assessment. Where existing information is inadequate, the collection of new information and data may be required before decision-making. Long term research or monitoring may also be necessary to correctly understand the effects of management actions on natural resources whose function and significance are not clearly understood."

2.3.1.4 Decisions documented in general management plans and other planning products, including environmental analyses and documentation, will be based on current scientific and scholarly understanding of park ecosystems and cultural contexts and the socioeconomic environment both internal and

external to the park. The collection and analysis of information about park resources will be a continuous process that will help ensure that decisions are consistent with park purposes.

? The park service is not monitoring the state of maintaining the recreational values for present and future generations. o Based on Park Service response to my FOIA request, the park service is not conducting routine recreational surveys to evaluate visitor or recreational user satisfaction with the GGNRA experience nor other surveys to help identify recreation current usage and the populations needs or barriers o For many of the sites, the GGNRA is not monitoring visitation on any level to determine whether the recreation value is being maintained , improved or degraded; and the park service is not showing how their management decisions for each site impact the recreation value for the current and future generations o Using the 2002 population survey and self-reported visitation plus the visitation counting methodology that ignores many entry points, the GGNRA is significantly understating current and yearly visitation and thus is not accurately reflecting the impact of management decisions on maintaining the recreation values for current and future generations o Not that visitation records baselines need to be established to determine whether how dog management plans impact overall park usage and site specific usage. For example, if a "no dog" area experiences a significant increase in visitorship due to the new policy and the area is overcrowded and yet other "voice-control" areas are underutilized or vice versa then the Park Service should re-evaluate the trail distribution in an attempt to maximize the number of people enjoying the parks and getting daily exercise

? The monitoring of recreational value and environmental impacts should be used to adjust the land use and management strategies (e.g., awareness, signage, barriers, etc.) for each park site. For example, if the "no dog" trails have an increase in visitorship due to "no dogs" then perhaps additional "no dog" trails should be added or vice versa.

Additional Notes on Natural Resource Monitoring Value:

Why is it significant that other Recreation Areas perform annual monitoring of resources and the GGNRA does not? Why is monitoring so important? As stated in an NPS publication, "Monitoring the Condition of Natural Resources in US National Parks" (http://science.nature.nps.gov/im/monitor/docs/Monitoring_Park_Condition.pdf) the purpose of monitoring is as follows: The overall purpose of natural resource monitoring in parks is to develop scientifically sound information on the current status and long term trends in the composition, structure, and function of park ecosystems, and to determine how well current management practices are sustaining those ecosystems. Use of monitoring information will increase confidence in manager's decisions and improve their ability to

manage park resources, and will allow managers to confront and mitigate threats to the park and operate more effectively in legal and political arenas. Additionally, a review of NPS online resources reveals that there is an entire infrastructure set up to guide and facilitate NPS properties in their monitoring duties, "Vital Signs Monitoring" (<http://science.nature.nps.gov/im/monitor/index.cfm>)

Correspondence ID: 4641 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Supervisor Dean,

Thank you for allowing public comment on GGNRA's Dog Management Plan and Draft Environmental Impact Statement. I respectfully submit that the plan is misguided and out of touch with how dog owners currently use GGNRA's lands. It is far too restrictive. Dogs are a much more integral part of the public's use of our park systems than they use to be, back when the original Pet Policy was instated.

I believe dogs should be allowed on the majority of trails throughout the various GGNRA parks. If they are on a leash, and the owners clean up after them, their impact on the environment should be minimal. If an area is so sensitive that an on-leash dog walking through it would damage it, then humans should probably be kept out of these areas as well. And, I understand that horses have been grandfathered in to GGNRA usage, but these large animals are far more destructive to the environment than dogs are. They damage the trails as well and are, rarely cleaned up after, making a hiker's trail experience much less pleasant than it would be had a horse not passed through there beforehand. It seems quite hypocritical to me to allow horses throughout the GGNRA system and to restrict dogs to just a few trails. (I also support off-leash areas, such as Fort Funston, and feel there should be no restrictions on leash length for leashed dogs.)

The new plan is especially restrictive for the trails on Mori Point, Sweeney Ridge, and Pedro Point, all where I live, in Pacifica. They are so restrictive as to keep people from enjoying the best parts of these three parks. You could not reach Mori Point itself with your dog, nor could you enjoy the views from Sweeney Ridge or Pedro Point. In fact, for the latter two parks, it would not be worth visiting with your dog, since you could not access the best parts. This is a shame, since they are all beautiful parks, with very nice trails on which to take a dog for a walk.

I live in Pedro Point in Pacifica, and my husband and I currently use the Pedro Point Headlands to walk our dog almost every day. We have a

neighborhood trail that connects with our property, so we can access the headlands from our front door. If the new plan is adopted, there will be only a short bit of trail where dogs can be walked (not long enough for a good dog "walk"). This trail is right along the highway and has no parking area associated with it. The main attraction of our headlands is the spectacular view, but this trail comes nowhere near the view—all you can see from it is the highway! If dogs are banned from the rest of the headlands, Pedro Point residents will likely be forced to use their cars to take their dogs somewhere else to walk them, not a good development for the earth.

The Pedro Point Headlands have been severely damaged through years of heavy motorcycle use and are now undergoing habitat restoration. We consider ourselves stewards in this on-going important project and help to keep an eye on it through our daily walks. Motorcyclists are still invading the area, and we try to talk to them to let them know that they are no longer allowed on the headlands. We also report them to the people in charge of the restoration, as they have requested, so they can have a record of what is occurring on the headlands. If dogs are severely restricted on the headlands, we will no longer be able to provide this service, as we will have to take our dog elsewhere to get her a decent walk.

This is especially sad for us, because, when we first considered buying our house, we walked up in the headlands and immediately said, "What a great place to walk a dog!" It definitely weighed in our decision to buy in this location, and we did adopt a shelter dog six months after moving in. We knew that the GGNRA was going to take over the headlands eventually but felt no worries because we knew it had pretty friendly dog policies. Unfortunately, that no longer seems to be the case. I hope that, with this public input, you may re-think your new policy and retain your dog-friendly approach.

Sincerely, Dianne K. Seaborg

Correspondence ID: 4642 **Project:** 11759 **Document:** 38106
Received: May, 16, 2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

I am writing to comment on the Draft Dog Management Plan/Environmental Impact Statement. I am a veterinarian as well as a dog owner and trainer. The stated objectives of the EIS are those we can all support. The question is how best to meet these objectives for those with a variety of priorities. I have attached a proposal that will address both the concerns stated in the EIS as well as those of the public who want to continue to enjoy the

outdoors in the company of their companion dogs.

Dogs are an essential part of the urban lifestyle we enjoy in the Bay Area. More than a third of Bay Area residents have dogs. Being able to experience outdoor areas designated for public use with our dogs is vital for many of us. Our dogs are not only companions, they provide confidence and security when hiking in isolated areas, much the same as hiking with a human companion ' a second set of eyes and ears.

Behavior issues are one of the common reasons dogs are surrendered to animal shelters. Lack of adequate exercise and socialization can result in destructive behaviors at home. Inadequate access to opportunities for outdoor exercise could well result in an increase in numbers of dogs being surrendered to shelters. Are we then trading one human and animal welfare problem for another? A positive attitude toward companion dogs is not universally held. I attended the NPS open house March 9 in Pacifica, where I had a discussion with Park Ranger, Daphne, who commented that some park visitors did not want to even see a dog on the trails. To Daphne this seemed to be a credible objection. It should be apparent that no policy will satisfy all concerns and that this level of dog aversion falls outside of any reasonable goal.

In my practice I see a wide variety of dogs and their guardians ("owners") who exhibit an even wider range of expectations for their dog's behavior. It is not so different from what is seen when observing parenting styles and expectations. Some folks have a passive approach to managing their dog and may be unaware that it is possible for them to exert any control over their dog's behavior. For them, a leash physically restricts the dog's access to their immediate vicinity and maintains an acceptable level of "control". Others that have invested time and effort in training are able to exert excellent voice control over their dogs. This range of expectation for dog behavior and owner responsibility makes a "one size fits all" approach to dog control unsuitable.

There are several issues consistently listed as negative consequences of dogs in our parks. Eliminating these most common complaints would satisfy the objectives of the EIS. 1) dog waste ' this is simply addressed by owners picking up their dog feces. I would point out that it is not uncommon to find feces on the trail from non-domestic species (foxes, skunks, raccoons) that are often mistaken for domestic dog deposits. 2) Dog impact on wildlife and vegetation 3) Dog-dog and dog-human interactions

Note that many of the areas used by dogs are also used by bicycles and horses, all of which have an even greater potential for these same negative consequences. In the EIS, this is mentioned only peripherally but deserves

greater attention as a means to attain the stated objectives.

Items 2 and 3 above are simply managed by keeping dogs on the trails, under control, either on leash or under voice control as currently allowed. Most difficulties arise when dogs are off leash and the owner does not have true control ("control" is defined as being able to consistently call your dog to your side even when there is something they would rather do). Unfortunately few dog owners have this level of voice control. When hiking, I myself, am often frustrated by the need to intercede when another dog approaches while the owner makes futile attempts to call their dog.

Training to achieve this level of control is possible but does not come easily; without it, dogs should remain on leash. Enforcing leash restrictions where they currently exist would address nearly all of the dog-related concerns. For those areas where dogs are currently allowed off leash, I would argue that we need a better means of identifying those individuals who understand the concept of voice control. I have attached such a proposal at the end of this document.

All of the GGNRA "preferred alternatives" would significantly reduce access by dogs, both on and off leash. Reducing access in this way is a simplistic approach to complex problem. If there are not enough personnel to enforce the current areas where leashes are required, enforcing areas where dogs are not allowed will be equally difficult. Restricting the number of accessible areas will only increase the pressure and negative consequences on the areas where access is allowed. This may result in a future justification for banning dogs from the parks altogether. In particular, the Compliance Based Management Strategy allowing further (and arbitrary) restriction without additional public comment is in contradiction to the spirit and intention of the outdoor areas maintained by the GGNRA. The proposal that all new GGNRA lands will have no off-leash access is another blanket approach to the problem. At a minimum, these portions of the proposed plan must be eliminated.

I urge you to consider the attached plan to allow permitted off leash dog access within selected areas of GGNRA. I would be happy to discuss details of this further and to help in any way to facilitate such an arrangement.

Sincerely, Cynthia S. Cook, DVM, PhD Diplomate, American College of Veterinary Ophthalmologists Past President, San Francisco Veterinary Medical Association Past President, Peninsula Veterinary Medical Association Proposal for Permitted Off Leash Dog Access Within Selected Areas of GGNRA 1. Individuals would obtain an annual permit that would allow them to have up to three dogs off leash in the areas of GGNRA where ROLA is currently allowed. 2. Obtaining a permit would require demonstration of acceptable voice control for at least one dog and payment

of an annual fee (\$100 suggested). This fee would offset the permitting process as well as support the trail maintenance in GGNRA. 3. Demonstration of acceptable voice control would require that the applicant be able to call their dog away from two leashed stranger dogs before contact has occurred. This "test" could be performed by licensed pet dog trainers or other professionals designated by GGNRA. 4. Those individuals who have obtained an off leash permit would be required, when accompanied by their off-leash dogs, to wear a nylon vest issued by GGNRA. This vest would have a large identification number that could be noted by others on the trails. 5. An infraction of off-leash rules (unwanted dog or human interaction, not picking up after their dog) would be grounds for a significant fine and/or suspension of the permit. Note that infractions could be reported by anyone on the trail, not requiring the presence of a Park Ranger. This policy would have a number of positive consequences, including: 1. Continued access by those individuals able to demonstrate standards of responsible dog ownership 2. Ability to hold permitted individuals accountable for their dog's behavior without the need for patrolling by Rangers. 3. Encouraging awareness, training and control of dogs by those wishing to obtain a permit 4. Financial support for trails and park maintenance by those who actively use the parks and who have a vested interest in their welfare.

Correspondence ID: 4643 **Project:** 11759 **Document:** 38106
Received: May,04,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

I have heard from a few people that the GGNRA will hear all of our comments during this time period and will basically toss out all opinions and go ahead do whatever it wants to do. I am still an optimist and believe (hopefully not foolishly) that we live in a democratic society and that our voices are heard and that we will be listened to.

I know that a lot of the Golden Gate National Recreational Area's land is secluded and away from large cities, but the areas in question (Fort Funston, Ocean Beach, Baker Beach, Crissy Field) are all part of a cosmopolitan area and need to be addressed as such. In San Francisco alone, it is estimated that there are nearly 200,000 dogs. I have had the pleasure, for the last 13 years, of being able to care for dogs (and cats) in the city of San Francisco. During that time I have learned very much about training and working with animals. One of the conclusions that I have come to in all my years doing this is that the single most important thing you can do for your dog is to socialize them with other dogs, people, children, etc. But especially other dogs. Dogs are

teachers. The elder dogs teach the young ones how to behave in a pack.

That's the problem with the preferred proposal by the Golden Gate National Recreation Area (GGNRA), which wants to drastically limit the areas where people can bring their dogs. Currently less than 1 percent of the parkland is now available for off-leash activity, yet the proposal would not only reduce that space but could forbid even leashed dogs in some places people love to visit. Any new lands added to GGNRA, under this proposal, would prohibit dog walking (even leashed) by default, unless a specific exception was made.

Neighborliness works better than drawing up battle lines. It's not a question of pet owners vs. non-pet owners, hikers vs. walkers, or any other oversimplified interest group. Our shared space is exactly that'shared. There's room for everybody, within reason, and within balance.

Census data show that there are more dogs than children in San Francisco, but again, it's never either/or. This city has always recognized and embraced animal companionship. For many of our citizens, their pet companions are family. After all, this is the city of St. Francis.

The GGNRA Draft Dog Management Plan, released in January, is a major departure from the established, balanced use of parklands that's prevailed here for forty years. Vastly reducing the off-leash areas in GGNRA would harm the quality of life of tens of thousands of dog guardians and, of course, the behavioral health of their dogs.

Dogs get the same benefits as people from playing outside. Companionship and exercise shape both dogs and owners into healthier, better urbanites.

The San Francisco Board of Supervisors understood the need for dog guardians to enjoy the outdoors with their companions when they made land available to the GGNRA, and cited it specifically. So the Draft Plan's claim that "the quality of urban areas is not a significant factor in determining a dog management plan" violates the spirit under which the GGNRA was created. I also fear that restricting dog-friendly spaces would discourage dog adoptions, not only subverting our animal-welfare goals but also threatening the ability of shelters such as the San Francisco SPCA to continue rescuing dogs.

I strongly object to the "Compliance-Based Management Strategy" as there will always be people who break the rules, but there is no need to punish the people who follow the rules.

One of my favorite areas to walk the dogs - of which I take only six or seven at a time - would be Fort Funston. This is one of the few areas in which the

dogs are now allowed to run and play off leash, but with the new ruling, the area allowed for dogs to play off leash is around the parking lot. Is that what the GGNRA really considers to be a safe area for dogs? With all of the cars coming into the parking lot, the risk of bodily injury to dogs (and people) would be much higher. Fort Funston is wild and full of sand dunes. What possible harm could dogs do to that area? I know that some objections have been made stating that certain bird life may be threatened, of which there is not sufficient data.

I know that some time ago the "naturalists" started digging up the ice plants - some at the Fort and more along the Great Highway. Now the Great Highway is closed so often when high winds occur because of this. The "naturalists" believe that we should bring California back to its native plants. I don't object to native plants, but don't tear out the plants (and trees) that are already growing here. Just because they're not indigenous, does not mean they should be torn down. Trees, especially, house many wild animals, so to tear them down just because they are not indigenous, seems pointless.

One of the things that makes San Francisco so great is all of the off leash dog walking areas. If anything, dogs need more off leash areas, not less. They can out-run and out-walk us 100 times over. They definitely need areas that are conducive to running, playing and getting all of their energy out. It makes for a much more well adjusted dog.

Please, please reconsider your management strategy, and leave the off leash areas just as they are. are

Linda Sherwood San Francisco, CA 94121

cc: U.S. Representative Jackie Speier U.S. Representative Lynn Woolsey
U.S. House Minority Leader Nancy Pelosi U.S. Senator Barbara Boxer U.S.
Senator Dianne Feinstein U.S. Representative Anna Eshoo

Correspondence ID: 4644 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

My name is Nina Lescher and I have been a Bay Area resident for 16 years. I currently own a home in Marin County, and consider myself very lucky to be able to have The Golden Gate National Recreation Area in my backyard. I have been an avid fan of Crissy Field for years, primarily because all sorts of people come there to stroll, picnic, windsurf, kite surf, jog, and play

Frisbee or football. Many people come to let their dogs run off leash and play. I haven't been a dog owner for very long, but I have always been really proud of the Bay Area for being conscientious enough to preserve places where people, off leash dogs, and nature could come together. I have traveled a lot and rarely found this anywhere else, and I believe the overall happiness and well being of Bay Area residents is so high because we have places like Crissy Field and Fort Funston where dogs, people and nature co-exist. Now that I own a dog, he and I visit Crissy Field, Fort Funston, Marin Headlands, Rodeo Beach, Muir Beach, Oakwood Valley and Homestead Valley a minimum of 1-2 times a week.

So that is why I am writing to voice my disapproval of the Draft Dog Management Plan and request that it be entirely rejected, or that Alternative A be selected for all sites. The current Preferred Alternative Plan is so severely restricted that it is unacceptable. The available data concerning environmental impact is insufficient. As an avid environmentalist, I am very supportive of the work the GGNRA has done to curtail erosion and protect plant and wildlife in the parks. I make sure that neither I nor my dog goes into areas that have been fenced off and designated (with signage) for replanting or environmental protection. In my experience, all dog-owners I've come across in GGNRA areas have very effectively used voice control to keep their dogs off these areas.

The GGNRA signage that informs visitors of the environmental work that's going on, and the alert to keep off those specific areas, shows everyone that we are a strong community working together to keep these areas beautiful for all. This is one reason why the Compliance Based Management strategy should be eliminated. It severely undermines the flow of communication between the public and the GGNRA, something that has been working effectively and can continue to get better. Ultimately, the Compliance Based Management strategy damages the collaborative relationship that makes the GGNRA a wonderful place.

Lastly, if the GGNRA is going to continue being one of California's-if not this nation's ideal recreational area, a new plan must be proposed that builds on what is already working so well for so many people. Since a new plan is not currently in place, Alternative A is the best plan. There are a huge number of dog owners in the Bay Area who depend on the GGNRA for off-leash dog recreation, and the number is only growing. Limiting their access to less than 1% not only makes the GGNRA a less desirable place to go, it diminishes the Bay Area as a whole as a desirable place to live. Dog owners would have one less reason to put up with the high cost of living if their wonderful places to recreate are taken away. Returning to the 1979 Pet Policy, which had been working so well for so many years, appears to be the best solution for our active outdoor community. I do hope you'll consider returning to that as a template going forward. Let us not forget that the

GGNRA's original mission, outlined in the legislation that created it, was "to provide for the maintenance of needed recreational open space."

Regards, Nina Lescher

Correspondence ID: 4645 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Ellice Sperber, age 56. I am a retired American Sign Language Interpreter for the Deaf and Deaf-Blind. I have served on the Board of Directors of Recording for the Blind and Dyslexic and The International Dyslexia Association. I currently am a Trustee at Gateway High School in San Francisco, a Board member of Parents Education Network in San Francisco and on the Advisory Board of The International Dyslexia Association. I have lived in San Francisco for 33 years and have owned a home in Forest Hill for 25 years and a home in Pacific Heights for one year. I have had dogs since buying my home in Forest Hill 25 years ago - all of my dogs have been well-trained and well-behaved. A part of being a good dog guardian does include proper exercise for dogs, which includes off-leash exercise under voice control. I have spent many years walking daily at Fort Funston with my dogs under voice control, keeping them out of fenced areas (even as boundaries changed) and I always have cleaned up after them. Recently, we find ourselves walking at Crissy Field with more regularity than at Fort Funston - the exercise for the dog and myself is just too important and we have been so happy over the years to have access to these areas for our exercise and recreation.

I am very concerned with the GGNRA's Preferred Alternative plan as it severely limits and affects the off leash dog walking areas at both Crissy Field and at Fort Funston. The Preferred Alternative slashes off-leash areas by nearly 90% - including areas that have traditionally been off-leash, voice control areas - including Fort Funston and the East Beach at Crissy Field. The Preferred Alternative is too restrictive. There is no justification in the DEIS for major changes in access and upon that basis I oppose it. Concerns as outlined in the plan are overstated and based upon a set of "what-Us." The 1996 GGNRA study that specifically found and stated that dogs did not disturb the bank swallows was not even included in the DEIS. I would support a formalization of the 1979 Pet Policy with the addition of simple management tools such as better signs, education programs, and low-lying vegetative barriers at cliffs.

I also oppose the Compliance-Based Management Strategy in its entirety.

Any restrictions should be based on actual documented impacts from dogs. The CBMS will not require any evidence of impacts, just the mere fact of non-compliance and poses as a strategy to completely end off-leash areas in the GGNRA. This is no way to work together within an established community and culture.

As an urban dweller, I have lovingly visited the GGNRA on a regular basis with my children and my dogs. We have sought these lands for recreation - as the name GGNRA implies it is to be used. My children, now college-age, visit the GGNRA when they are home visiting with our dog. It is a part of their lives (as well as mine); it is an important part of our lifestyle. The city is a crowded place to live and we renew our bodies and minds by taking these walks. Our dogs also are well behaved as a result of getting proper exercise that only can be gotten off-leash, getting out and smelling the natural world, and socializing with other dogs.

The DEIS treats the GGNRA as if it is a pristine National Park - however - the GGNRA is an urban recreation area. I have made some of my closest friendships within the dog community at Fort Funston. Lasting friendships that have continued for years throughout the lives of many dogs, miscarriages, pregnancies, deaths and graduations. For me, the GGNRA provided a community that I could go to daily at the same time and walk with the same people (and our dogs). Every day, I had a community where I could share my struggles and be heard and listen to other's struggles and offer my support. This is what life should be like. The GGNRA areas in San Francisco are communities with a culture based upon a shared recreational activity - off-leash dog walking. This culture provides our community with places to exercise our dogs, while enhancing the social, physical, emotional and spiritual aspects of being human. The openness of the lands of the GGNRA offer what few city parks are able to - and the mass numbers of dogs and people who would need to use city parks if they were unable to utilize GGNRA lands would be unbearable.

For these reasons among others, I strongly oppose the Compliance-Based Management Strategy and the Preferred Alternative proposed in the DEIS. Let's find a better management plan and learn to share this 1% of GGNRA urban land more thoughtfully.

Respectfully, Ellice Sperber

Correspondence ID: 4646 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Andrea Patterson. I have lived in San Francisco for over 30 years. While I have always loved the city I wasn't aware of how many beautiful places there were to go walking until 15 years ago when I got a dog. Despite a back problem that is so severe doctor's are amazed I'm walking at all have become an avid hiker. I hike all over the Bay Area. Many of my favorite spots are part of the GGNRA and in danger of being severely restricted: the Oakwood trail and Muir Beach in Marin, Mori Point, Crissy Field and Fort Funston. Having access to these places is a major reason I stay in San Francisco despite the huge expense of living here. During all this time I have not seen any evidence of dogs damaging the environment, harming wild life or threatening people. The DEIS claims all of the above but provides no evidence to support their claim. Speaking specifically of Fort Funston which I visit almost daily, I think it would be a good idea to alternate the closed off areas. This would allow heavily used areas to be restored while not impacting the amount of space needed to accommodate so many visitors.

Re Fort Funston: The preferred alternative off leash area is unsafe (bounded by the busy parking lot and dangerous cliffs) and far too restrictive for the number of dogs and people that frequent Fort Funston. As stated earlier I come to Fort Funston to walk, not to stand around. I can do that at any of the fenced in dog play areas in the city. Re: the 75% compliance that is mentioned in the DEIS. How will the 75% compliance be determined? This alternative is setting us up for failure.

San Francisco is known world wide for a being a city of tolerance. Fort Funston is a prime example of this. People of all ages, races and varied socio-economic backgrounds are out enjoying each other's company, most having the common bond of loving nature and dogs. This is a huge success. The GGNRA should be proud of it's accomplishments here. I hope the GGNRA will consider the devastating effect the restrictions would have on people using their RECREATION areas. I would like to express my full support for the "No action alternative".

Sincerely, Andrea Patterson

Correspondence ID: 4647 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I was born and raised in San Francisco, and I have chosen to make the Bay Area my lifetime home. Since the age of 12, I have always had dogs in my

life. The GGNRA is a central part of being a dog owner in the Bay Area. Being able to take my dog for a walk or a hike in the parklands is of great importance to me.

I am deeply saddened by the GGNRA's current proposal for the parks, as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) are not based upon sound science or long-term monitoring of site-specific conditions. As a responsible dog owner, I keep my dog under voice and sight control, clean up after him, and keep him out of restricted areas. It is important that areas like Crissy Field remain open for off leash dog walking access.

As a long-time volunteer in the parks and former employee of the Parks Conservancy, I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options besides restricting dog-walking access should be considered first. For example, it is not clear where dogs are allowed. I think the GGNRA should provide better signage and create more environmental barriers where necessary, such as the vegetative barriers surrounding the tidal marsh at Crissy Field.

Over the past 10 years of regular visits to Crissy Field, I have seen very few incidents of dogs going beyond the fences that enclose the dunes or the marsh, and even fewer incidents of dog aggression. I have never seen a dog be aggressive to an adult or a child. With the many dogs that are there on weekdays, and the hundreds that are there on weekends, I think that is quite remarkable, and certainly does not justify the restrictions being put forth in the GGNRA's preferred alternative.

Please review the following problems with the proposal and revise the DEIS to correct these errors:

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the DEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. I wish that the DEIS would include an

alternative along these lines.

The proposed "compliance-based" approach should be modified to create a baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

I am also concerned that the DEIS doesn't take into account the potential effect of restricting off-leash dog walking on San Francisco's public parks, which could see a huge influx of dogs as a result. The GGNRA cannot do its planning without thinking of other neighboring recreation areas, such as the public parks, particularly in this time of limited resources.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts - other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors.

The DEIS needs to provide full disclosure to the public and decision makers. If dog-related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We

need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone - so that an informed decision can be made.

The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site-specific information that these areas are inappropriate for continued dog walking. I urge you to support Alternative A with individual consideration for any new lands, for the sake of the health and recreation not only of thousands of Bay Area residents and their canine companions, but for everyone who enjoys the GGNRA. Thank you for your time and consideration of the above information.

Sincereley, Morgan Cosby

Correspondence ID: 4648 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

I have lived in the San Francisco Bay Area for more than 30 years. I consider myself to be a strong environmentalist, an animal (especially dog) entheuaiast and and educator. I am a member of the Association of Pet Dog Trainers, Mariu County Veterinary Association and the Prissy Field Dog Group. My past included being / serving as President for the Mariu County chapter of the National Organization for Women, President of the Bicycle Trails Council of Mariu and a member of the Mariu County Human Right Commission.

The human-animal bond is extremely important to me, especially that between my dog, Kara and I. I consider myself to be a very responsible dog guardian and frequently educate others, including my students and clients, both directly and by example. My dog, Kara as all my previous dogs, is under voice control. Both she and I respect others (human or animal) as well as sensitive areas.

Respectfully, I disagree with the GGNRA's current prefereed alternative for many reasons. I will not go into all of these here as that would be a very long letter. The GGNRA preferred alternative is without due cause overly

restrictive, and eliminated off-leash dog access in many areas of GGNRA.

The DEIS does not acknowledge the recreational values that need to be preserved for future generations. Phil Burton made clear that he wanted an urban park/area that would provide for the recreational needs of all user groups. As stated in the GGNRA mission statement, "The mission of the GGNRA is the preservation, unimpaired, of the natural and cultural resources, and scenic and recreational values, of the part for present and future generations to enjoy' Any significant limitation on recreational uses should be properly, carefully and objectively examined.

The EIS fails to provide long-term monitoring data that dog activities actually threaten GGNRA lands. The document needs to modify its conclusions based on scientific evidence. If there are indeed problems, be it with dogs and their people or other user groups, solutions such as educational programs and increased/better signage should be considered.

At the open meeting in April at Tam High, Mill Valley I introduced myself to you and many of your staff. As I did in the 1980s and 1990s around the mountain bike issue, I would be happy to help with educational efforts. All users need to be embraced and educated, not alienated and polarized from each other.

After research, consideration and reflection I strongly support Alternative A, the no action alternative. The DEIS is biased against and does not take a hard look at the no action alternative. There are many areas of GGNRA where existing 1979 Pet Policy has been working. I look forward to working with you and your staff on a fair and unbiased alternative.

Respectfully,

Angela DiMeglia, M.S.

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|-----------------------------|---|-----------------|-------|------------------|-------|
| Correspondence ID: | 4649 | Project: | 11759 | Document: | 38106 |
| Received: | May,31,2011 00:00:00 | | | | |
| Correspondence Type: | Letter | | | | |
| Correspondence: | My family and I agree that the lands and ecosystems inherited by us are our responsibility to protect. Not limiting human activities that harm is irresponsible. In the case of our Golden Gate National Park/Recreation Areas, that means limiting usage to prevent damage. Therefore, it is right and our responsibility to limit areas where people are allowed to let their dogs run off-leash. Legally re the National Park guidelines, this actually means NO off-leash dogs, | | | | |

San Francisco Bay Area citizens have in the past given dog guardians wide latitude in behavior--which a majority have consistently and horrifically abused. Just in the past few years we have caused the near extirpation of Snowy Plovers in the GGNRA, extirpated California quail in the Presidio, the near extirpation of foxes on the Presidio and on and on not even mentioning the erosion and destruction of native plants via dog digging and running. Observational surveys bear out that a majority percentage of the dog guardians (so-called in many instances) have abused the privilege given to them. It is now time to stop their irresponsible and egotistical behavior and say NO MORE,

I did not serve my country for 20 years in one of the areas in question (the Presidio of San Francisco) to allow our lands and ecosystems to be destroyed because we were afraid to take a stand. I wholeheartedly applaud our Park Service for recognizing the problem and solving it, at least partially; by their new laws restricting where people can take dogs off leash.

This has never been a dog problem. It is a homo sapien problem-- homo sapiens who egotistically and selfishly consider themselves more important than anything else and above responsibility to the commons. I would go so far as to say that their attitudinal and ego issues influence their behaviors to an extent that they are actually using their dogs as a means of manifesting their disdain for others and for our society--a form of projection in medical terms.

Having worked as a volunteer and being a fairly frequent park visitor, I have had many opportunities to observe people-with-dogs behavior. In fact, in the area where I volunteer I conducted a survey over several months in 2008, a survey in which visitor behavior with dogs was recorded, in this No off-leash area, over 60% of the dogs were off-leash. In fact, often for as long as 20 minutes the so-called "guardians" didn't even know where their dogs were. So much for the alleged "voice control"--does not work too well when the dog cannot even be seen! When the signs were pointed out to the visitors, about half the time the reaction was of either silence or angry outburst. Sometimes showing the people recent dog digging or explaining how dog behavior is so destructive was effective. This speaks to the simple ignorance of the public. The general public only sees dog romping; they do not in any way understand the ultimate negative effects upon ecosystems and the landscape. This shows an enormous void in the knowledge base or perceptual understanding of the general public--they do not know and cannot see. Many dog guardians really do want to be responsible, but have not the barest understanding what to do, not do.

To be effective now and in the long run, our Park Service must address the huge issue of public education which should go along with restrictions on

people letting their dogs run helter-skelter. Run "helter-skelter" they do, and this is a safety issue. In 2006, an elderly relative would no longer walk at Ocean Beach because he had been knocked down by a dog. We went to Golden Gate Park, but he was scared there too. We went to Crissy Field once, but the situation was even worse with dogs running loose all over. I, myself, was almost knocked down by a dog in a local park. Running dogs off-leash in leash-only areas is irresponsible and should be prosecuted as a crime.

Thank you, Park Service, for taking responsibility and limiting the opportunities for unknowing of proudly-irresponsible people to abuse/destroy out ecosystems and landscapes

Correspondence ID: 4650 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: A subsection of the aforementioned web site (Program Goals) discusses the goals of park monitoring: "Natural resource monitoring provides site-specific information needed to understand and identify change in complex, variable, and imperfectly understood natural systems and to determine whether observed changes are within natural levels of variability or may be indicators of unwanted human influences. Thus, monitoring provides a basis for understanding and identifying meaningful change in natural systems characterized by complexity, variability, and surprises. Monitoring data help to define the normal limits of natural variation in park resources and provide a basis for understanding observed changes; monitoring results may also be used to determine what constitutes impairment and to identify the need to initiate or change management practices."

Awareness/Training Programs

? Implement a dog voice-control awareness/training programs, in cooperation with organizations like the SPCA, to help minimize the few dog issues. Note that, if necessary, reasonable fees should be charged for the programs but there should also be options for low income individuals. b. Educate people on the rules regarding areas that allow dogs and what the rules are c. Create common etiquette and rules of the road for these more natural parks: i. Controlling voice control dogs to not allow unsolicited dog encounters with pedestrians, bikes, horses, leashed dogs ii. Not throwing objects off the trail to encourage fetch games that may damage vegetation iii. Not encouraging dogs to go off the trail iv. Preventing dogs from harassing wildlife or digging d. Training programs in cooperation with leading dog organizations v. Dog play/recall/trail training and awareness/rules vi. Dog desensitization/management for horse encounters

vii. Knowing what is appropriate recreation for their particular dog e. Encourage people to train for voice-control with their dogs at parks like Fort Funston, before attempting to hike under voice control on trails or high mixed use f. Educate and encourage disadvantaged groups to use their dogs to facilitate daily exercise, family activities, and community engagement and to also socialize, exercise, and train their dogs to make them healthier and safer for the community g. Use these forum to encourage sound stewardship and to encourage people with dogs to volunteer to improve the parks Protected Species/Natural Environment Non-Site Specific Suggestions & Comments

San Francisco Garter Snake

There is no evidence other than speculation that dogs have had or will have any impact on the San Francisco Garter Snake, particularly in comparison to other park activities such as the park service using vehicles for plant restoration or patrols or bicyclists. According to the US Fish & Game 5 year summary and evaluation report at http://ecos.fws.gov/docs/five_year_review/doc774.pdf , dogs are not mentioned nor listed as even a remote threat unlike cars and bicycles have been known to kill individuals. Real impacts were issues such as 1) loss of open spaces to construction, 2) loss of grasslands (due to stopping grazing and fire suppression that allows for denser vegetation growth), and 3) illegal specimen collection.

Based on the URS for San Mateo County, the SF Garter Snake has never even been documented at Sweeney Ridge, Milagra Ridge or Pedro Point and only in one location on Rancho Corral de Tierra. Just having suitable habitat is certainly not reasonable justification to even list as a potential issue and certainly not to rate as a minor adverse impact. While individuals exist at Mori Point, there is no evidence to list dog recreation as a minor adverse impact there either. Even if dogs were under voice control in these areas, there is no credible link between voice-controlled dogs and the garter snake, particularly in comparison to other common activities like the Park Service use of vehicles, water trucks on Sneath Lane, or bicycles.

California Red Legged Frog

There is no evidence other than speculation that dogs have had or will have any impact on the California Red Legged Frog population, particularly in comparison to other park activities such as the park service using vehicles for plant restoration on Mori Point or patrols or bicyclists. According to the US Fish & Game recovery plan, dogs are not a listed as a threat to the frog. The ponds are enclosed at Mori Point so it is only a rare anecdotal dog that enters the ponds and that is not likely to have any more than a negligible impact on the population at Mori Point. As for frogs on dispersed habitats,

the DEIS provides no evidence of dogs interacting with or harming any of the frogs in the GGNRA.

Based on the URS for San Mateo County, the California Red Legged Frog has never even been documented at areas of Sweeney Ridge, Milagra Ridge or Pedro Point that allow dog access and only in a few locations on Rancho Corral de Tierra. Just having suitable habitat is certainly not reasonable justification to even list as a potential issue and certainly not to rate as a minor adverse impact. While individuals exist at Mori Point, there is no evidence to list dog recreation as a moderate adverse impact there either particularly considering the ponds are enclosed. Even if dogs were under voice control in these areas, there is no credible link between voice-controlled dogs and the frogs, particularly in comparison to other common activities like the Park Service use of vehicles or bicycles.

Hicknian's potentilla - Federally and state endangered

There is no evidence other than speculation that the Park Service that dogs would prevent the establishment of this plant at these locations with the "no action" alternative. However, these plants do not exist in the park currently, and there is no evidence they ever existed in the park or that the Park Service would ever be successful in propagating these plants from Monterey County to these non-native locations in San Mateo County. It is disingenuous to include this plant in the DEIS at all since it is not native to the area, and it should be removed from both the Mori Point and the Pedro Point impact statements. Mission Blue Butterfly

There is no evidence other than speculation that decades of dog recreations has had or will have any impact on the Mission Blue Butterfly population. Dogs aren't listed as a threat on any on the US Fish & Game or GGNRA literature or the monitoring literature on the Mission Blue Butterflies such as the Mission Blue Butterfly Monitoring in the Golden Gate National Recreation Area by Susie Bennett on the sfnp.org website. The butterflies decline at GGNRA sites is linked a fungal pathogen that killed 80% of the host plant and then it could not be re-established because of lack of natural disturbances including elk grazing and grass fires. The overall population decline is due to habitat lost to development not due to dog recreation.

There is no credible justification for rating dog recreation as Minor adverse impact at Sweeney Ridge or Milagra, particularly considering that 1) dogs are not allow on Notch Trail where the host plants exist on Sweeney Ridge and 2) there is no evidence that even off-road travel by a dog would harm the plants. Even if trampling existed, the DEIS does not document the extent and if it does exist it is mostly likely due to hikers or Park Service activities not dogs.

The same is true for all the DEIS rating above negligible. Just because the Mission Blue Butterfly exists at these sites does not mean there is any impact from dogs. If the park service wants to be extra cautious the Park Service should install simple cable barrier which have been quite effective in keeping people and dogs on the path. However, the lupines on Milagra Ridge seem the most prolific where there has been some soil disturbance, probably by hikers. From talking with a ranger testing the lupines reaction to soil disturbances at Milagra Ridge, the only real impact from dogs would be if the dog was actively digging up the adult lupines and that would take deliberate intent for an owner to allow and the increased regulations are unlikely to stop someone that wants to deliberately destroy the plants. There is not even anecdotal evidence that dogs have dug or impacted the lupine population or the butterfly. Unless scientifically justified, these ratings should all be changed to negligible for the "no action" alternative and should not be used as a justification for reducing or banning dog recreation.

Alta Trail, Orchard Fire Road and Pacheco Fire Road-Moderate Fort Baker-Minor Marin Headlands Trails-Moderate Milagra Ridge-Minor Oakwood Valley-Moderate Sweeney Ridge-Minor

Soil/Vegetation

There is no credible evidence that dogs are causing more than negligible measurable damages to the soil/vegetation at any site in San Mateo County that has a significant impact. Based on my personal observations, the only social trails and erosion are at Mori Point from people going off trail, up to the scenic top. I've never even seen dogs on the social trails at the site, and they would only go up those trails if accompanied by a person. I've only seen people climbing to the top of the hill, and there are few signs to deter people from going up those social trails nor a Park Service trail to the peak. The existence of these social trails, straight up the hill, gives the appearance of being the trail to the scenic top.

The Park Service has provided no scientific evidence that dog urine or feces is impacting the soil at any of these sites or that compaction is occurring, and there is no visible evidence that isn't attributable to just people alone. Certainly, the vegetation is healthy except for some of the native plant projects on the site that seem to be lack for rain fall. Certainly, Sweeney and Milagra show no signs of dogs causing any visible impact on the soil or vegetation. At Milagra, I mainly see trampling from volunteers/rangers marking native plants occurrences. The DEIS provides no scientific measurements and no evidence that current dog activity will impact soil or vegetation incrementally and impact future generations enjoyment of the park. In addition, I requested evidence supporting the impacts in a FOIA and the Park Service did not provide any evidence. The park service can address any perceived problems with the native plant projects by using barriers or

plant guards that would be required for a wilderness area. In the wilderness, animals such as wild canine and deer would destroy the native plant restoration seedlings immediately. The Park Service should use similar techniques on the Mori Point areas that are immediately adjacent to the paths, plus supplement with adequate water and nutrients. Certainly the native plants appear to be healthier this year perhaps due to the increased rainfall.

All adverse impacts for the "No Action Alternative" should be changed to "Negligible" unless there is actual measurable evidence that the dogs have had impacts on the soil or vegetation over the decades and those impacts are incremental more than negligible wear and tear that is not accumulating. In addition, dogs stay near the trail beds and at most an estimated impact of 0.5% of the soil and vegetation at any of the sites. Certainly dogs are relatively small, distribute their weight on four paws, and don't create new social trails along the San Mateo trails system due to the random and infrequent nature of any off-trail activity. If the Park Service, speculates that dog recreation is creating a greater impact, the Park Service should conduct scientific studies to justify that position before claiming more than negligible impacts.

It may seem trite but Grizzly Bears once roamed these lands and one 350 pound Grizzly Bear probably had more of an impact on vegetation and soil than all of the dogs off the trail beds in San Mateo County. Vegetation and soil can easily withstand a few relatively small, four pawed dogs randomly off the trail bed for short periods of time. However, most dogs stay on the trails and I never see owners encouraging dogs to go off the trail, particularly considering that poison oak is an issue at most sites and people are actively hiking or jogging. The Park Service is creating imaginary impacts and showing little understanding of significant impacts on vegetation or soil that are truly detrimental of nature. All impacts in the DEIS related to soil and vegetation should be changed to negligible for San Mateo County unless compelling scientific evidence supports a different rating.

Milagra Ridge: NEPA Element- Soil DEIS Adverse impact Statement-
Minor

Mori Point: NEPA Element- Soil DEIS Adverse impact Statement-
Moderate

Sweeney Ridge: NEPA Element- Soil DEIS Adverse impact Statement-
Minor

Mori Point: NEPA Element- Vegetation- Coastal communities DEIS

Adverse impact Statement- Minor

Milagra Ridge: NEPA Element- Vegetation- Coastal scrub and chaparral
DEIS Adverse impact Statement- Minor

Mori Point: NEPA Element- Vegetation- Coastal scrub and chaparral DEIS
Adverse impact Statement- Minor

Pedro Point Headlands: NEPA Element- Vegetation- Coastal scrub and
chaparral DEIS Adverse impact Statement- Minor

Sweeney Ridge: NEPA Element- Vegetation- Coastal scrub and chaparral
DEIS Adverse impact Statement- Minor

Coastal Wildlife

The DEIS provides no GGNRA measurements showing any impact of dog recreation and according to the response to my FOIA request there have been no wildlife inventories or monitoring since the 1990s. Obviously, the Park Service is not overly concerned that wildlife is declining in these areas. However, I know that there are some inventories and monitoring (e.g., raptors, Mission Blue Butterfly, Northern Spotted Owl, etc.) that the Park Service did not provide, which brings into question the credibility of the Park Service. The Park Service provided no evidence of even a single wildlife disturbance by a dog in San Mateo County from 2001 to 2010. Even though I see some wildlife flushing occur just like with any human activity (e.g., ranger patrols, hiking, bicycling, equestrian, etc.), there is no evidence that these inconsequential and rare disturbances have any more than insignificant impact on the wildlife populations in these parks particularly in comparison to other visitors without dogs. Rabbits, ground squirrels, and birds are the most common animals along the trail bed and they flush off the trail or beach when a person, horse, bicycle, or vehicle passes. There is no scientific evidence that provides more than speculative evidence that dogs on-leash or off-leash have any significant impact on these wildlife above that of a hiker without a dog. In almost 50 years of living on a farm and regularly visiting parks, I've never seen a dog catch wildlife but I'm sure it happens on extremely rare occasions. Even if a dog once in a while catches a bird somewhere in the GGNRA, that is inconsequential in comparison to other activities that the Park Service sanctions such as fishing and hunting and inconsequential in comparison to the 80,000 acres and natural attrition and wildlife interactions.

Any disturbances are further minimized in the coastal scrub/chaparral areas by the denseness of the vegetation and the poison oak, which encourages owners to keep their dogs on the trail bed. All DEIS impact statements and justifications should be modified to indicate negligible impacts on from dog

recreation on wildlife unless studies in the GGNRA provide evidence that adverse effects are more than speculative and negligible for these recreation areas.

Attachments:

Excerpts from the San Francisco Garter Snake S-Year Review 2006, US Fish & Wildlife Service http://ecos.iws.gov/docs/fiye_year_review/doc774.pdf

Pg 17

Increased growth in the human population has also put greater pressure on land managers to provide recreational opportunities. Most recreational activities like hiking and jogging are not a threat to the SFGS. However, off-road vehicles (OHVs) and bicycle activity at the West of Bayshore site have killed snakes and degraded the habitat (Larsen 1994). OHVs have been used at Mori Point as well, which has led to the erosion and degradation of upland habitat for the species (D. Fong, pers. comm.). Unfortunately, efforts to limit OHV trespass on protected public and private land is difficult without adequate enforcement and regulation.

Pg 20 The amount of illegal collection of the SFGS and its effect on the species is not clear. Several factors are believed to have contributed to a decline of these illegal activities at the West of Bayshore site in recent years. However, employees with the California State Parks continue to believe that unauthorized take remains a threat to the species (P. Keel pers. comm., J Kerbavaz pers. comm.).

Pg 25 One of the greatest threats to the SFGS is the reduction of habitat quality resulting from the elimination of disturbance events throughout the Peninsula. Primarily, this is based on changes in management that encourage seral ecosystems. Other factors affecting the continued existence of SFGS include the increased presence of invasive species which can compete for resources with SFGS or hunt individual SFGS directly. Finally, lower level threats include reservoir topology and hydrology, vehicular strikes, hybridization with the RSGS, and interspecific competition with congeners (other *Thamnophis* species and subspecies). However, due to a continuing lack of accurate population estimates, the overall impacts of these events on the species remain unknown.

The persistence of seral ecosystems in protected regions of the Peninsula threatens the SFGS (H. McQuillen, pers. comm.; S. Larsen, pers. comm.). Dynamic grass-dominated uplands provide for, and are potentially maintained by, burrowing rodents (Stromberg and Griffin 1996) which create tunnel systems used by SFGS for hibernacula during the winter

months (Larsen 1994, McGinnis et. al. 1987). The loss in recent years of ecological disturbance throughout the majority of San Mateo County has made it possible for brush species to dominate former grasslands, potentially precluding burrowing animals. Fire suppression has allowed for the domination of these woody species across the coastal landscape, limiting the extent of grasslands which were likely important movement corridors for populations of SFCTS in their migrations between aquatic habitats (D. Hankins, in litt. 2006). Additionally, the loss of traditional grazing practices on public lands has allowed for the accumulation of dense brush-dominated canopies across the remaining grasslands which may decrease habitat suitability for the Several State and Federal laws currently protect the SFGS and its habitat. Despite these protections illegal collection may be continuing in California state parks and other easily accessed areas. To minimize these unauthorized collections, the Service should encourage additional law enforcement at sensitive sites.

Example of Enabling Legislation Allowing Hunting - A significant wildlife disturbance <http://www.nps.gov/chic/planyourvisit/hunting.htm>

Hunting is a permitted use under the enabling legislation for Chickasaw National Recreation Area (P.L. 94-235, '3). The legislation also provides for the designation of zones and periods when no hunting is permitted for reasons of public safety, administration, wildlife management, or public use and enjoyment.

A variety of game including quail, turkey, squirrel, rabbit, dove, ducks, geese, and deer may be found here. However, due to the small size of the area and heavy hunting pressure, success is limited. Trapping is prohibited. All deer and turkey taken within the Chickasaw National Recreation Area must be checked-in at the nearest certified Oklahoma Game Check Station. . >60 National Park Service Ran Parks Allow Hunting <http://www.nps.gov/findapark/index.htm>

Highlights of Relevant Personal Background ? Lived in the Bay Area for 17 years and am an avid outdoors and nature lover that has frequented many National Parks, National Forests, and most of the parks in the Bay Area. Before Ella, a dog, joined the family, I visited National Park Service parks including Yosemite, Yellowstone/Grand Tetons, Lassen, Glacier, Grand Canyon, Redwood, Point Reyes, Pinnacles, Zion, Bryce, Death Valley, Canyonlands, Channel Islands, Denali, Dinosaur, Sequoia/Kings Canyon, Mesa Verde, Muir Woods, Natural Bridge, Padre Island, Rocky Mountain, and SF Maritime. Since Ella joined the family, we have not been to a park, other than the GGNRA, that is managed by the National Park Service because dogs are not allowed beyond the main park corridor (e.g. the campgrounds and parking lot and superficial trails). Not being able to visit the National Parks is one of the hardest things about having a dog as a part

of the family. ? Frequent the GGNRA dog-friendly sites almost daily for 5 years since Ella, an Aussie, joined our family with most GGNRA visits to Sweeney Ridge, Mori Point, Fort Funston, and Milagra Ridge. Before getting Ella, Sweeney Ridge was the only one of these GGNRA sites that I had visited more than once in 12 years in the Bay Area. Instead we tried to always go to new open spaces during our weekend hikes with Sweeney Ridge and Sawyer Camp / San Andreas / Canada Road trails being standard hikes/runs/bike that we did 4 or 5 times a month. We also had gym memberships which we no longer have since we can't exercise Ella and go to the gym. We find hiking so much more rewarding with Ella; we interact with so many more people because having a dog, like having a small child, facilitates social interactions that rarely happened without a dog ? Spent the past four months canvassing the GGNRA and other dog-friendly locations talking to people with dogs and raising awareness of the GGNRA plan. This included many discussions regarding the experiences and needs of people with dogs ? Co-author of the SaveOffLeashDogs Call to Action weekly email regarding the GGNRA dog management plan and active member of the SaveOffLeash coalition with primary responsibility for grass roots organizing for San Mateo County, SFDog, and Ocean Beach Dog ? Member of the Peninsula Australian Shepherd Club, the Australian Shepherd Club of America, Ace Dog Sports, and the Bay Team (an agility organization) ? Over 20 years of experience as an auditor in public accounting firms and corporations and a Masters in Accounting Information Systems and a Bachelors in Agricultural Economics/Accounting ? Graduate of the SF SPCA Dog Training Academy, a six week intensive program taught by Dr. Jean Donaldson, a nationally recognized dog behaviorist ? SFSPCA volunteer trainer responsible for addressing more significant behavioral issues such as reactivity, fear, rude behaviors, and puppy socialization ? Grew up on a farm with a virtual zoo of animals related to this plan including dogs, horses, mules, deer, quail, geese, and ducks and in a rural areas with significant wildlife populations ? Read the 2200 Page DEIS and visited all but 3 of the 21 sites included in the plan plus visited the new lands at Rancho Corral de Tierra in Montara ? Analyzed the 2001 to 2010 GGNRA Law Enforcement Access data headers and the 2007 to 2008 pet-related cases in the PDFs ? Reviewed the available GGNRA inventories and monitoring reports provided by the GGNRA related to a Freedom of Information Act request ? Rely on the GGNRA for daily walks to help prevent morbid obesity, diabetes, heart disease, and breast cancer , which is prevalent in my family as well as stress relief ? Rely on GGNRA to responsibly care for Ella, our dog, and for ensuring that she is a healthy and safe dog for the community and for those visiting our home ? Committed environmental advocate for addressing real issues that make the world a healthier and happier place for all our interconnected beings. Member of the Sierra Club

ID:

Received: May,27,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Dear Superintendent Dean:

I had not realized, at the SFSU open house, that it was you who spoke with me as I entered. Having seen your picture in the Chronicle, I now appreciate even more the openness and graciousness with which you treated me. Thank you for taking that approach to this sensitive issue.

I am a parent. Our family has been introduced to the GGNRA because, about 16 months ago, we took ownership of a beautiful, smart, playful, and energetic Australian shepherd puppy. Prior to that, we rarely went to Crissy Field and, in 16 years, had visited Ft. Funston twice. Now, we visit Ft. Funston at least twice each weekend, sometime three or four times and, during the summer, multiple times during the week.

Because we have a dog, we have begun to enjoy the GGNRA (even areas with no off-leash access like Sweeney Ridge). We urge you to protect the access dogs have in Funston, Ocean Beach, and Lands End. 'There should be no net reduction in those areas. I don't see how our family's recreation ' or that of the many other users we meet there ' can be served by further limiting dog access.

I believe that you serve the city, the peninsula, and much of the greater bay area by continuing to maintain the current freedom that dogs and owners have in those parks (and would make things even better for all by enforcing the restrictions at Ocean Beach). I understand that the challenges at Crissy Field are complicated and wish you the best in resolving them.

I do believe there are things we could do to make things work better for the breadth of GGNRA visitors and do so without reducing access. Here are some suggestions:

? Offer special licensing for off-leash access. I understand that having dogs off-leash creates unique demands for the National Park Service. I am looking for ways to help you deal with them. One way to help fund the extra training, maintenance, and effort it puts on your organization is to have dog owners like me pay for it. I would happily pay a subscription fee to let my dog play off leash at Funston.

? Require special training for off-leash dogs. At the listening session, I heard horse riders share concerns about dogs who bark at horses and owners who don't deal with it. Similarly, dog owners with well trained dogs repeatedly have expressed concerns about untrained or the (extremely few) overly

aggressive dogs. Why not insist dogs pass an approved certification program, showing that they are trained to deal with the complications presented in places like Funston. Owners of misbehaving dogs would be either fined for not going through the process or be required to have their dogs recertified before again being allowed to play off leash. This would benefit owners, dogs, GGNRA, and all other users.

? Create a fund for supporting dogs in the GGNRA. I tried to donate money, a substantial amount for me, to the Golden Gate Conservancy to help deal with the impact of dogs. They have funds for bicycling and for hiking trails. With all the hubub over dogs, I thought they would want to help you guys deal with that, too. No go. They couldn't take the money and assure me that it would be directed in ways that reduce clog impact on your organization_ With all of the bay area dog owners who LOVE Funston, Crissy Field, and the fun their dogs, my bet is that we could help the GGNRA face many of the challenges effectively. I know this isn't your turf. Still, I would happily volunteer to help get it going. I know that the GGNRA is trying to protect the parks for all of its visitors and for future visitors, too. But, Funston and sections of the other parks have a special role in the recreation of a large number of bay area residents. I think we can find a way to support the breadth of interests while protecting the relatively small areas that dogs and their families have for off-leash recreation. Other changes my family could easily support:

? Enforce the rules that exist. If dogs are not supposed to be off-leash on. Ocean Beach, fine owners who let their dogs play that way. It seems to me that many of the concerns expressed by non-owners comes from not being able to get away from dogs. Enforcing those rules will lead to greater adherence to them and less complaining overall.

e Arrange access in Crissy Field and The Presidio so there is a net-zero reduction in off-leash space. In neighborhood. SF parks, I have had dogs steal food from my toddler or trample on my picnic. I understand the frustration that causes in a multi-use space like Crissy. If you choose to reduce the space for off-leash clogs, move it somewhere else which is less multi-use, like into the nearby Presidio. There are wonderful areas there which are not nearly as heavily trafficked.

o Replace post/bam fences with others that will keep dogs out. At Funston, I rarely see dogs in the areas designated for wildlife and plant protection. But, the few which do make it in seem to have become a hot button, Just putting fences up which dogs cannot walk through will address this.

I have lived in many cities. Funston is the most successful urban park I have seen. It receives gobs of love and care and the greatest commitment from those who go there, despite its remote location and questionable weather.

Dog owners join the monthly clean up efforts and routinely pick up the messes left by others in their community. They visit in any weather. The joy per acre is higher there than at any park I have visited. The effect of restricting dogs in the preferred option is so great that it will, I believe, slash the number of visitors. The preferred option Nv 1 1 result in less people enjoying Funston and, consequently, hurt the mission of the GGNRA. I recommend we find ways to protect the access dogs have their while reducing the burden on the NPS. I would be happy to help retain that success.

Gary Beberman. San ancisco, CA 94114

Correspondence ID: 4652 **Project:** 11759 **Document:** 38106

Received: May,17,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

I am writing as a concerned citizen regarding the DEIS. I am involved in the Welfare Commission in SF. Another Commissioner and I attended the subcommittee hearing a few weeks ago in which Supervisor Weiner's resolution was adopted that SF reject to the preferred alternative. We gave a brief presentation showing the underused SF dogs parks rejecting claims that restricting NPS lands would lead to overcrowding.

I strongly encourage you to improve the plan by including the following steps:

1. All Regulated off-leash areas" should be fenced, as much as is reasonable and doable considering wildlife and habitats. Fences work well in DPA in SF parks. Dog walkers respect the fences. They provide more security for all park users and create clearer boundaries so dog walkers comply with park rules.
2. Commercial dog-walking should not be permitted in the GGNRA. This is a commercial activity in the park and the NPS cannot legally permit it.
3. Under the current plan, nearly every trail in SF is open to at least on-leash dogs. No trails are available for people who prefer to enjoy the outdoors without interacting with dogs. Some trails in SF should be entirely closed to dogs.
4. The NPS has tried to comply with the process that it is charged with that is to maintain safe and accessible access to all users and to protect the natural and cultural resources for future generations. Dog groups motivate

their members to speak up about their "rights" to continue walking their dogs as they please based on baseless exaggerated statistics created by their groups. They also believe, by numbers, they will get their way as they did with the Supervisors. Environmental groups have not been nearly as vocal and impassioned.

5. The dog groups have defined what is being proposed as being extreme and actually harmful to the well being of dogs by making ridiculous claims that loss of areas to run will lead to behavior problems, increased surrenders to shelters and, eventually, euthanasia. SF needs to use its own resources and not that Of the Federal government to exercise their citizen's dogs. Less than half of the dogs at Fort Funston are from SF based on petitioning I did there on a political campaign, Prop 2.

6. I have not heard mention of the A.D.A., in the DEIS. Off-leash dogs impact disabled people's ability to enjoy the Parks as well.

Thank you for this opportunity to comment on the Dog Management Plan, I support and encourage you to adopt the measures that will protect the National Park's resources for everyone, not just dogs and their owners. They will quickly get used to the changes and the Parks will be the better for it.
Thank yOu, Philip Bernie

Correspondence ID: 4653 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: I am a senior, a San Franciscan, a dog guardian, a hiker, an environmentalist, a five-year docent at the Academy of Sciences, and a yearly financial contributor to many environmental organizations, including the Audubon Society. I AM COMPLETELY OPPOSED TO ANY CHANGES IN RULES FOR DOGS IN THE GGNRA. LET DOGS RUN OFF -LEASH IN ALL THE AREAS WHERE THEY ARE CURRENTLY ALLOWED.

I love taking my 10 112 year old well-socialized 85-pound dog to Fort Funston. We both enjoy the views, the feeling of the salt air, the exercise and the camaraderie with both humans and canines at the beach. To me, there is no more beautiful sight in the world than healthy, happy dogs playing in a beautiful environment.

Like many dogs, mine is better behaved off the leash than she is on the leash. This is a well-documented phenomenon. At Fort Funston when she is off-leash, she is usually attached to my leg by invisible velcro, unless she

has gone off to sniff a tree to catch up on the news.

My dog adores children and will let a child do anything to her. As a small child, I was bitten by a dog, because no one told me not to go up to strange dogs and demonstrate my affection by hugging them. Whenever I have my dog, I use her to teach children how to meet a dog. Both the children and their parents are delighted, and children who had been a little fearful of a big dog smile with glee.

I always take poop bags with me and always clean up after my dog. I carry an extra bag in case someone has forgotten theirs. Dog guardians and professional dog walkers are good stewards of the land. They not only pick up after their own dogs, but after other people's dogs and after inconsiderate and thoughtless humans. The detritus I see at Fort Funston and other parts of the GGNRA is not biological dog waste, but the waste left by humans, the kind that is nonbiodegradable and potentially very dangerous: plastic pop bottles; beer cans; used condoms; used needles; etc. The biggest impact on any land is not dogs, but homo sapiens, when a

"Dog" people look out for one another, for their dogs, and for any human who might be hurt, scared, or lost. Any time there is a negative discussion among dogs, everyone rushes in to help and the altercation ends.

I can't imagine anyone using Fort Funston for anything but the recreational uses it currently has: dog walking, bicycling, and hang gliding. It is very often cold and foggy, with sand swirling into one's nose and eyes. The dunes are too unforgiving. This is not a place where one would choose to picnic or to play softball, regardless of whether or not there were dogs here. Any argument to the contrary is simply a straw man.

There would be a lot fewer people in all areas of the GGNRA if dogs had to be on leashes, except in very limited areas. Like many others, I would be very reluctant to walk in Fort Funston or other more isolated parts of the GGNRA if there were no dogs and dog people there.

Like Buena Vista Park in San Francisco they would become havens for illicit public sex and drug dealing, with its concomitant violence. Dogs keep us safe. Thugs don't want to be in areas where dogs run free, because dogs sense their malicious intent and protect not only their individual people, but all others peacefully walking in the park. I personally witnessed this in a San Francisco dog park when what turned out to be a very strange man entered the park. Without our realizing it, an Australian Shepherd herded the dogs and people into a circle. Then a normally sweet and placid German Shepherd planted himself in front of the "herd" and barked. The man left.

These are my personal reasons for wanting things to stay as they are. There

are many fallacies, poor methodology, and lack of evidence in your document. (at least in the Executive Summary, since I couldn't bring myself to read any further.)

1. AGE DISCRIMINATION AND VIOLATION OF ADA I am 69 years old and had knee surgery 10 years ago. It is difficult, if not impossible, for me to go down to the beach and then back up again. Therefore, I could not walk my dog off-leash in Fort Funston under the proposed plan. For me and those similarly affected, this is both age discrimination and a violation under the Americans With Disabilities Act. ADA requires that the entity involved do what is reasonable to mitigate the barrier. There is a very simple answer at Fort Funston: allow all people, regardless of age or disability to walk their dogs off-leash on the paths above the beach.

Even if the Federal Government is not covered under Federal Law, what a public relations nightmare. Seniors can be very cranky if we are abused and we have the time, ability, and desire to publicize a public wrong. I believe that there is already a class action lawsuit on the basis of disability pending. You can thwart it now, by not changing anything.

2. FEAR OF DOGS "Since the 1990s, the San Francisco Bay Area population and overall use of GGNRA park sites have increased, as have the number of private and commercial dog walkers. At the same time, the number of conflicts between park users with and without [ita!. Author's] dogs began to rise, as did the fear of dogs and dog bites and attacks." (p.iii) This trope is repeated many times within the document, along with the argument that San Francisco is a diverse community with different cultures. My answers are:

a. There is no evidence.

b. Fear is not an event. As I noted above, people are often afraid because they have never been socialized to dogs, and don't understand them. The way to overcome such fear is to have good encounters with dogs.

c. I am fearful of boys and young men playing with balls. I grew up in the Midwest and was hit in the head with snowballs containing ice. I am constantly afraid I will be hit. Young ball players are not supervised. I am also afraid of congregations of drunken high school and college students. Much of the crime in the country is committed by young men of that age. But I do not argue that these activities and people should be banned because of my fear. The argument that there is a diverse population is politically correct, but specious. This is still a country based on Western European beliefs and culture. (For example, there is now a move to ban shark fin soup, because it is cruel to the shark, although people of many cultures find it a delicacy.) There are parts of the world where cows wander the streets

because of religious views. We would not permit that here. The fact that someone's country of origin does not value dogs should not affect American policy, any more than the low regard that many countries have of women should affect American policy and law.

d. The more people who use a facility the more interactions, both good and bad, there will be, as you indicate above.

3. PURPOSE OF THE GGNRA "The purpose of the GGNRA is to offer national park experiences to a large and urban population while preserving and interpreting its outstanding natural, historic, scenic, and recreational values." (p. 5)

a. You have not proven that off-leash dog walking is inconsistent with this mission statement. In fact, there rarely are any other people in the park other than those walking dogs, bicycling, flying kites, or hang gliding.

b. Those of us who are guardians to dogs are a large percentage of this urban population. Our chosen recreational activity is walking with our dogs offleash. Therefore, since you are so concerned with providing access to all demographics of the population, logically, the rules must provide for our recreation, as well as that of others who choose to recreate in another fashion.

4. TELEPHONE SURVEY AND INFORMATION DERIVED FROM IT
As reported in the executive summary (p. 9 ff.), your telephone survey of 400 households in Alameda, Marin, San Francisco, and San Mateo counties is seriously flawed:

a. Too small a sample: If we assume that there are approximately four million people in those counties, then the sample number represents .0001 of the population, far too small a sample from which to draw conclusions.

b. There is no mention of criteria for inclusion in the sample. It is too small a sample to use simply random selection.

c. There is no mention of the margin of error. It sounds as though the questions were slanted to elicit the response that you wanted, i.e, that people were opposed to off-leash dog walking. Was there a pre-test to ensure that you were not contaminating the sample. All who design and employer surveys need to be aware of Heisinger's theory.

5. PROTECTION OF NATIVE SPECIES 'a. The snowy plover is an endangered species. However, it does not nest throughout the GGNRA. Specifically, it does not nest anywhere in the sand dunes of Fort Funston. Your solution is illogical. By forcing visitors who want to walk their dogs

off-leash to do so at the shoreline, by your own assessment, you are endangering the very shore birds you want to protect. If the dogs could be walked off-leash on the path around the cliffs, there would be practically no shore birds to disturb.

b. You are also concerned with predation. However, you cite no specific evidence to show that dogs have anything to do with killing or disturbing the few bird species other than corvidae or raptors live on the dunes above Ft. Funston.

c. The only predation I know of comes from raptors and corvidae. This is part of nature. The disturbing interaction I see on the paths above Fort Funston is the corvidae teasing dogs, sometimes even luring them down the cliffs.

d. In addition, most people who love dogs also love birds and they are the first people to call for help when a bird or other animal is in distress.

e. If you are concerned about habit degradation, look to people. Children adore chasing birds and aren't stopped by parents. Adolescent or young men find are oblivious to their environment and find chasing helpless animals entertaining. Besides, hunting is allowed in National Parks. This is considered healthy recreation. Its sole purpose is to stalk and kill defenseless animals, including birds. Why is hunting not detrimental to birds when there is a direct correlation between hunting and death of native species?

f. You also mention on P. 16 that [reos swallows on the coastal bluffs of Fort Funston]. "Park staff have observed dogs in the 12-acre Habitat Protection closed to Public Access and on many occasions, dogs and humans [italics mine] were observed within the Habitat Protection Area." How, then, can you attribute any degradation to the flora and fauna to the dogs when it is obvious from your own observation that humans disturb the protected area? Also, how many dogs on how many occasions. You cite no real evidence that the very presence of dogs causes harm to the cliff swallows. This is one of many instances of the logical fallacy of "Post hoc; ergo propter hoc" contained in this document.

6. DANGERS OF DOG WASTE The EIS frequently mentions dog waste and the diseases that it can potentially carry.

a. At least one part of a National Park, the Five Brooks section of Point Reyes, permits horses and they produce a lot more and larger waste than dogs. No one picks it up and the National Park Service is not concerned about possible diseases it may carry.

b. Children play in the water at Crissy Field and along Ocean Beach. In

swimming pools, children are not allowed in the water while they are wearing diapers, but there is no such restriction on the waters of the Bay. (Even so, there is no real protection; I was at a deluxe hotel in Hawaii where they closed the pool because a child had had a bowel movement in the pool. At least, they quarantined and treated it.) I have seen small children, encouraged by parents, relieve themselves in the water at Crissy Field. No one is concerned that this contaminates the water, both for other humans and for other animals that share the same water. And diseases carried by humans are far more likely to affect humans than diseases carried by dogs.

c. The San Francisco Chronicle of May 26, 2011 has carries an article by Peter Fimrite entitled "Where Not to Go in the Water at Bay Beaches. The article condenses the findings by the environmental group Heal the Bay at the 68 beaches it monitored in San Francisco, San Mateo, Alameda, Contra Costa, and Marin Counties. Ten beaches were labeled "best, including Ocean Beach at both Balboa and Sloat Blvd, where off leash dogs are allowed. Among the most contaminated was Baker Beach, (part of the GGNRA) where off leash dogs are not allowed. If one accepts the methodology and conclusions of the report, then the logical deduction is that dogs and their waste do not affect the overall water quality at a beach!

7. PROTECTION AGAINST NON-NATIVE PLANTS The EIS expresses concern that dogs can carry rare and exotic seeds (page 15)

a. Humans can also carry seeds or parts of plants. That is why automobiles entering California are stopped and screened for agricultural products and why all people entering the United States must declare any biological material they are carrying and why they and their bags can be searched by the Department of Agriculture. That is also why visitors leaving or entering the Rainforest at the Academy of Sciences must undergo decontamination.

8. NOISE-Concern that the sounds of barking dogs upsets people's wilderness experience.

a. The GGNRA parks that are within urban San Francisco are not really wilderness. The sounds of traffic, gun practice, electronic devices, and other nonwilderness sounds make this a specious argument.

b. To many, barking can't possibly be more offensive than the sounds of people yelling and screaming in the GGNRA or playing awful music at earsplitting volume. Young people today have no sense of personal space or privacy. Wherever they can get reception, they are on their phones, subjecting all to the intimate details of their lives.

c. I have been deep into the woods at Point Reyes, listening only to the birds and the sounds of my own footsteps when my ears were assaulted by people

whose only means of communication is screaming. If it's wrong for dogs to make noise, it's much worse for people, who have the capacity to know better

9.EROSION OF SAND DUNES On the western edge of San Francisco, there is little that dogs can do that could possibly compete with the forces of nature, which constantly erode and resculpt the sand dunes. One can see examples of this all along the beach in places where there are no dogs. It is part of the cycle of life and this erosion happens all over the world. It is because of erosion that paleontologists are able to find ancient fossils. It has always happened and it always will happen. Blaming erosion on dogs demonstrates either an ignorance of geology or a bias.

10. IMPACT OF RESTRICTIONS ON OFF-LEASH DOG WALKING ON SAN FRANCISCO AND SUBURBAN DOG PARKS "Because the San Francisco Bay Area is so urbanized, dog owners may have only minimal options for exercising their dogs outdoors." (17) You recognize the lack of good alternatives in your own report. The GGNRA is not like other National Parks. It is in the middle of a dense urban area. If people could not walk their dogs off-leash in the GGNRA, the pressure on city parks would be immense. Problems between dogs often result from overcrowding in enclosed spaces, just as they do with humans and other animals.

a. On the day of the Japanese tsunami when all beaches were closed as a precautionary measure, the increased use of San Francisco City dog parks was well documented. For all of these reasons, I again urge you to leave off-leash dog walking as it currently is.

Sincerely, Linda Blondis

Correspondence ID: 4654 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Diana Helander. I have lived in San Francisco for over 20 years, and have owned and lived in the Western Addition, Duboce Park, and now in Lower Nob Hill. Throughout much of this time, I've been a dog owner, and have had several rescued, well behaved and trained dogs who have always been under voice control and in my sight when walking them off leash. Currently, my dog visits Fort Funston and Crissy Field 4-5 times every week. I always clean up after him, and always prevent him from entering restricted areas.

With the assistance of appropriate (and expanded) signage at both Fort Funston and Crissy Field, I believe every dog owner can be a responsible visitor to the GGNRA sites, and given the chance, the majority already are. On my walks with my dog, I see responsible owners picking up after their dogs, and making sure their dogs are well behaved. It's also wonderful to have the chance to socialize with other dog owners, and I'm frequently asked by children if they can pet my dog (a friendly beagle). Their delight when interacting with him is palpable.

I'm opposed to the GGNRA's preferred alternative plan in that it severely limits and affects the off-leash dog walking area at Fort Funston and Crissy Field. The proposed restrictions ' particularly at Fort Funston ' have the potential to create a safety issue for dogs and people, and I believe DEIS has not adequately analyzed the impact of restricting the off-leash area at Fort Funston. Introducing a non-compliance measure which doesn't have to be documented has the potential of permanently ending off-leash access means the majority of those with dogs are penalized for the actions of a very few.

These areas are urban recreation areas, and as such, different regulations need to be applied to allow urban residents to enjoy their surroundings. This is not a wilderness area, nor should it be treated as one. I certainly support environmental conservation, and enjoy being in nature. Walking my dog is one of the primary ways in which I can enjoy the great outdoors while getting some exercise: to be able to do so at Fort Funston and Crissy Field is one of the joys of living in San Francisco. Unfortunately, the "preferred alternative" is not really an alternative for dog owners, but an even tighter restriction on the regulations which already exist and work well, and which have allowed me and my dogs such wonderful moments over the last 20+ years.

I would hope that the GGNRA, in developing a general management plan, will carefully consider the needs of urban residents. I fully support Alternative A, the No Action alternative of the DEIS, as it relates to Fort Funston and Crissy Field. Sincerely, Diana Helander San Francisco CA 94109 Cc: Secretary Ken Salazar, Department of the Interior Christine Lehnertz, Regional Director, National Park Service, Pacific West Region Jon Jarvis, Director National Park Service Nancy Pelosi, Member, U.S. House of Representatives Diane Feinstein, U.S. Senator State Senator Leland Yee State Senator Mark Leno email cc: Mayor Ed Lee Distric 6 Supervisor, Jane Kim fortfunstondog.org sfdog.org crissyfielddog

Correspondence ID: 4655 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter

Correspondence: Dear General Superintendent Dean,

There is little if any chance that one letter could persuade a mind all ready made up, but I will attempt to at least give you my perspective on the Dog Management Plan as presented by the Golden Gate Recreation Area 2011. I have spoken to you personally at the public meetings in San Francisco and Pacifica; I have spoken to a few of your wonderful Rangers and volunteer workers. I want now to just list some of the main issues regarding Fort Funston specifically, because I feel that that recreational area has the best chance of remaining largely a mixed use/regulated off leash district, even within the confines of restoration, recovery and regulations.

According to the Executive Summary the following points address your Purpose for Taking Action:

A: Preserve and protect natural and cultural resources and natural processes The U.S. Fish and Wildlife Service, Recovery Plan for Coastal Plants of the Northern San Francisco Peninsula Region 1 of 2003 set out a very ambitious plan to bring back some threatened species of plants. I have enclosed there map of the Fort Funston area and would like to point out that the goals of the recovery seem achievable even if the main areas of the Fort are left for dog walking, roaming and off leash recreation. The goal is to bring back 75 acres of the Lessingia at Fort Funston which is an enormous amount! As I see it the restoration could take place in all areas minus the M (Ig) section and there would be plenty of room left for the dogs and their people!

Why can't there be this compromise? Page ix of this report gives an estimated \$23 million dollar cost for this project (includes Fort Baker and other areas as well), but wow, who's money is that anyway? The GGNRA is also given an ultimatum on page 45 of this report to "adequately regulate trampling impacts" on the dune and control adverse vegetation (read ice plant), in order to help the lessingia, thus the push to get rid of the dogs! The dogs love the ice plant, and the ice plant loves the dogs ' no money required. The area that stretches from the parking lot to the beach access cliff/path is a wonderful, rough and craggy place for the dogs to romp and socialize. The numerous paths that have been made by all of us and the dogs are natural outcomes of a perfect symbiotic relationship between the users of this property and the land itself. No one else uses this land as often as us dog walkers. Why try to make it into something that it is not, and that by way of a huge monetary cost? With a few minor improvements, the "paved" raised walkway to the drinking fountain and over to the north side, perhaps an upgrade to the bathrooms, and Fort Funston would be just fine. We do not need the wonderful, yet manicured, facelift that Crissy Field underwent 9 or 10 years ago. Some things are better left alone, this is nature after all.

B: Provide a variety of visitor experiences In the wonderfully diverse Bay

Area we are blessed with a multitude of outdoor experiences. We have oceans and parks, lakes, islands, wetlands, tidal pools, all within reach of anyone looking to touch nature. Some of these areas are easily accessible through an extensive well landscaped almost pristine network of paths and designated trails. Many of these trails and paths have been cultivated to an extent that would make a professional manicurist jealous. All evidence of "nature" is left for the imagination, yet it is an experience that affords the visitor lovely vistas, photo spots and the fresh air of the bay. The variety of visitor experiences is not very varied. Fort Funston and many of the dog areas under your jurisdiction are an exception, at least as they stand now. They are not fussy areas. You cannot go there in your "good" shoes, or fancy clothes. They are natural, for however messy they are, they are pristine examples of the natural ability of the wind, sea, sand and plant life to survive. And, the dogs (with their people) ask for nothing more. No fancy flowers or walkways or plaques or lattes or picnic baskets. Just backpacks, parkas, Frisbees and balls please. Take that away and what type of variety of visitor experiences are we talking about?

"Healthy Park Healthy People US 2011"

In April the National Parks Service held an impressive three-day event at the beautiful Cavallo Point Resort in Sausalito. Superintendent Dean was among the guests. Topics ranged from healthy convenience foods to health insurance and "connecting parks and people. NPS Director Jon Jarvis was a key speaker and had much to say about the need for Americans to get out and recreate in the National Parks that our country is so proud of. No one spoke of dogs not being allowed on National Park Lands, no one spoke of the fact that many people walk and run with their dogs as part of their fitness regimes and to many older seniors this is their only companion to help them get outdoors and socialize with other dog owners. The health insurance groups are now even giving reimbursements for NPS admissions to subscribers in order to entice the public to get out to the parks.

We, the dog walkers of the Bay Area, go to the parks daily, in all types of weather, with raingear or windbreakers. We don't need enticements we just need the use of the land!! Please let us continue to use the land, especially at Fort Funston, as freely as we can.

The April issue of Sunset magazine (Sunset April 2011 p.16) had a small article on the subject mentioned above, about a new program called Park Prescriptions. It cites the Golden Gate Institute as bringing together parks, doctors, and insurance companies to tackle obesity and try to get more people outdoors. What a great and novel idea! I would just like to bring your attention to the photo that Sunset chose to accompany this article (see enclosed). It is a picture of four happy humans hiking along a path WITH a very happy looking collie walking with them off-leash!! Nature itself is

augmented when enjoyed with loved ones ' two-legged or four-legged or both! I suppose Sunset magazine does not know of the prohibition on dogs in most state and almost all Federal parks! Please help change this policy by keeping as much of the territories in the GGNRA that are currently being used for off-lease recreation intact!! The percentage of land is miniscule, less than one percent of all your lands.

Practically every table in your Dog management plan/Environmental Impact Statement mentions the issue of adjacent dog parks provided by San Francisco or other municipalities. The insinuation is that off leash areas in the GGNRA are simply redundant and unnecessary because cities provide areas for dogs to play off-leash and that should mitigate any loss of lands in the GGNRA. This is profoundly inaccurate and a very confused assumption. Take the Fort Funston proposal which states that the nearest off leash area is provided by the City of San Francisco at Lake Merced. Have you ever seen the area at Lake Merced? Have you ever looked at Fort Funston? There really is no comparison. Fort Funston is loved by hundreds of dog enthusiasts who come from every region in the bay area. You may not understand how proud we are of this park. It could be a very impressive step for the National Park Service to grant this type of use on just this tiny wisp of land on the very edge of our great nation! Please work magic to keep it as it is now!

C & D: Improve visitor and employee safety/Reduce user conflict I have enclosed a copy of my preferred alternative for Fort Funston. The yellow areas would remain as a regulated off-leash dog area. The GGNRA Conservancy could cultivate and gentrify the rest. The California Lessingia could make a comeback on the lands to the north of the dog area and to the south of the GGNRA territory. The barn swallow would nest in the dunes to the north and south of the off leash area as well, and they already have adapted for the most part, according to your own report (see page 1263, in the special-status species section). The Northern Arizona University survey done in 2001-02, cites that more than half (56%) of the respondents either had never been to Fort Funston or not even sure if they had been there. Not many people actually go out of their way to visit this place. It is off the beaten path, it is usually in fog or bad weather, lots of wind. It is not your typical picnic area or a bring the kids and build sand castles beach area. It is rugged, it is gritty and it is perfect for dogs!

"I don't believe the current situation is tenable," commented Superintendent Dean, "we are looking for a balance not a ban." I understand and agree with Mr. Dean. I understand that the Park Service has one concept and the GGNRA Conservancy has another and the USFWS has again one more concept of how these lands should be "managed". There must be a balance, a compromise given somehow. We, the dog walkers, have nothing to offer. We are not a huge lobby, we have no real money, cannot influence

politicians. The environmental groups like the Sierra Club and Mid-Peninsula Regional Park District and the East-Bay Regional parks district, all have enormous coffers. They hold enormous amounts of power and land in the Bay Area. It is right and good that those lands are set aside free from development and preserved for nature. The people who walk their dogs off leash on GGNRA lands are only asking for less than one-percent of the total GGNRA lands to be left for the primary purpose of recreating and exercising with their dogs. Please!

The issue of user conflicts at Fort Funston can be best mitigated by clear signage and self regulation on the part of the dog owners and the general public. Your report does not reflect any major conflict or safety problem at Fort Funston. The number of incidents is very low compared to the hundreds of dogs and their people that go out there on a weekly basis. Education is key here, to educate visitors as to what they may encounter is important: i.e. cliffs (don't fall off or let your child or dog go that way), Dogs: you will encounter dogs off leash in this area, so if you don't like dogs stay on the sunset trail or perhaps go to another area, also be aware of the dogs, even dog walkers get knocked down from time to time, so we all have to be vigilant; and keep aggressive dogs on leash or away entirely, no one likes a nasty dog (big or little!). The GGNRA Conservancy group has a website that is very misleading when it comes to Fort Funston. The website depicts this park as a great place for a long stroll or beach picnic with the kids. In actuality, the terrain and weather out there limits most users to a one or two hour visit. The website should be fair and truthful, it needs to let the public know that this is a great place for dogs, be proud of this and just call it what it is. What is the National Park Service afraid of? Dogs are supposed to be man's best friend; we need to share with our friends!

E: Maintain park resources and values for future generations Maintaining the park resources as they are today, with a generous off leash area is not the same thing as management of the dog issue. The first would only require vigilance on all are parts to clean-up after ourselves, help with coastal clean-up days and keeping our dogs under voice control at all times. Management means that you want to control and confine the current situation, manage things along a predetermined vision of a model view of what "parks" should look like. Please do not allow the "look but don't touch" mentalities ruin our interaction with nature.

In closing I can only reiterate my plea to keep most of Fort Funston a sanctioned designated Off-Leash Dog area. With the help of signage and education, the general public will come to know this as a wonderful haven for dog lovers and their best friends. Some sort of permit system for the professional dog walkers would be advisable to assure the safety of all the dogs, with a maximum of 6 dogs per walker. All dog owners quickly realize that recall and obedience are absolutely necessary whenever you bring a dog

somewhere off leash, that is just responsible dog-ownership anyway! Clean-up days at all these areas already exist and the dog walking community is always eager to assist. We are nature lovers, dogs are part of nature and taking them out unfettered is sublime.

Please live up to your Mission Statement and show adaptability and flexibility in keeping Fort Funston, and most of the other GGNRA areas under question, as free for the dogs as possible, so that the public (ALL the public) can enjoy recreation on our publically owned park lands. What better gift, what better values are there to give our future generations ' our children and our dogs' puppies as well?

Thank you, Kathleen Klestoff, resident of San Francisco for 30 years, companion to Zelda, our 4-year old Border Collie, who loves Fort Funston, Ocean Beach, Baker Beach and her Frisbees and balls. Crissy Fields is too cultivated and orderly for her, but terrific for many other dogs. See, even in the dog community there needs to be a place for all the different tastes.

Correspondence ID: 4656 **Project:** 11759 **Document:** 38106
Received: May,03,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Sir,

I cannot agree more with the enclosed article written by Cindy Beckman and would like to submit some personal views.

The people walking with their dogs that we see early every morning are every bit as environmentally conscious and appreciative of their surroundings as the theoreticians that drew up the proposed regulations. There are a number of us who sweep the beach each morning for unwanted debris. This consists of anything from non-dangerous, but unsightly pieces of styrofoam to more lethal objects like hypodermic syringes. We have also assisted in the reporting and protection of injured or sick sea lions and birds. In all the years we have enjoyed these walks, we have never seen one instance of dogs interfering with people walking on their own. On the contrary, the ones we meet all seem happy to greet us and our dogs

Please be aware of the irreparable damage that will be caused to the quality of life of those of us who frequent the recreation area on a daily basis, for whom these off- leash walks have become such an important part of our lives.

Sincerely Peter Blumberg

Correspondence ID: 4657 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

As a long time environmentalist, taxpayer and dog owner, I am very disappointed with the GGNRA draft dog management plan. The document makes assumptions about the impacts dogs have on the environment, but provides absolutely no scientific evidence of those adverse impacts.

I have been visiting GGNRA lands, including Oakwood Valley and Muir Beach, for decades. I now see more wildlife, including bobcats, coyotes, rabbits and deer than I have ever seen before. There have even been reports of mountain lions. Using your weak criteria, one could just as legitimately make the opposite argument that the environment has only improved as the number of dogs has increased.

The document makes wild assumptions that there are negative impacts on the environment due to dogs. There are no studies showing that things are worse today than they were yesterday or even ten years ago. Without a baseline study there is no foundation for these policy changes. I have attached photos of Oakwood Valley to visually demonstrate that flowers and plants are thriving on and near the dog trails. And, more astonishingly, the draft plan assumes all of the alleged negative impacts have been caused by dogs, not humans. Where's the evidence? The document fails to provide long term monitoring data to support its claims that dog activities threaten the parklands. The document's conclusions must be modified based on scientific evidence.

For example, the draft plan says dogs need to be banned to protect stranded marine mammals and shorebirds. There is no documentation or evidence indicating that dogs have ever interfered or caused any harm to those protected species. In fact, I would argue that humans without dogs have caused much more harm to the environment and wildlife, from trampling plants and grass by holding huge festivals to the subsequent littering. Where is there a comparison of exclusively human impacts and exclusively dog impacts? Perhaps, humans should be banned.

And furthermore, I think you need to re-evaluate the no action alternative. In evaluating this alternative, the dog draft document again, makes assumptions that there will be negative impacts because dog owners will not comply with voice control and other regulations. The fact is, this alternative could include improved management, education, better signage and enforcement. Dog owners, for the most part, are good stewards of the

environment. We are the ones out there every day, walking the trails, taking in the beauty, and making sure our environment is not deteriorating. We need to be embraced and utilized not ostracized and made to feel like criminals.

We live in a suburban area that's surrounded by GGNRA land. People have been walking their dogs on these lands for centuries. If the GGNRA decides to further limit dog walking as recreation, what few surrounding parks and trails that allow off-leash activities will become overcrowded and ruined. More trails are needed not less.

I walk my well-behaved black lab every day on the Oakwood Valley trail and have done so for years. I drop my children off at school and literally walk to the trail, reducing my carbon footprint and keeping both my dog and myself in shape. Closing off trails to any user group with the country facing such high obesity rates is down right negligent.

And finally, I would like to voice my support for Alternative A, the no action alternative and would also include more lands for people to recreate with their dogs including areas such as Cattle Hill, Sweeny Ridge, Mori Point and Milagra Ridge to name a few. Sincerely, Cassandra Fimrite Mill Valley, CA 94941 Cc: Representative Nancy Pelosi, 8th Congressional District of California, House Minority Leader, US House of Representatives Ken Salazar, Secretary of Interior Jon Jarvis, National Park Service Director

Ps- Dear Representative Pelosi, please help us save our parklands from becoming off limits to this important user group- dog owners! We care and we vote!

Correspondence ID: 4658 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

Having been born and raised in San Francisco many years ago, I can remember Crissy Field as an airfield. As a matter of fact, my first flights were in a Ford Tri-Motor which took off and landed there. However, that's history.

Most recently, I have enjoyed walking our dachshunds both along the walks, and on the beach. To be truthful, I walked, and they ran, but they were always under voice control. To both of us it was a real treat and we looked forward to our visits. Sadly, our last dog, Lucy, died about a year ago, SO I miss our outings. In all the years only twice did I see a dog or its owner

misbehave, and even then the dog was brought under control quickly. I noticed that everyone I saw picked up anything-left by the pet.

It is my understanding that in National Parks, dogs must be "leashed". However, the Presidio is the first of such parks in an urban setting, and therefore in my opinion, some rules and regulations should be changed to adapt to the new situation. I don't propose that dogs be allowed to run wild throughout the park, but certain areas such as Crissy Field should be open for the dogs and their masters, or mistress, to use without restrictions.

I should also add that my wife and I have had a house at Stinson Beach for 49 years. Our dogs, and those of other owners, have always loved playing on the sand, and it was a joy for us, and for them. Here again, someone was always with them.

Certain areas demand that a dog be leashed, but I worry that too many regulations are both unnecessary, and uncalled for. I understand that it is said that some things being considered have not been studied enough or simply don't, or should not, apply to this situation. I must admit that I have not read every word, nor do I intend to. What I do suggest is that dogs have rights within reason, and common sense should prevail.

Very truly yours, Charles F. Lowrey

Correspondence ID: 4659 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Re: GGNRA Pet Management Plan ' Comment on DEIS

Dear Superintendent Dean:

I oppose the Preferred Alternative described in the DEIS and urge your to take no action to deviate from the existing pet management policy. Continue to apply the 1979 Pet Policy with the interim changes. If you deviate from the current management practice at all, I suggest that you reconsider the seasonal leash restrictions at Ocean Beach and reopen public access to some of the closed areas at Fort Funston.

As to Ocean Beach, I have long thought that it would be appropriate to have some small area where there are no dogs at all to accommodate park visitors who want a beach experience but are fearful of dogs. I think the far north most part of Ocean Beach near the Cliff House would be the logical place to have an off limits area of around 100 yards. That would accommodate the interest without breaking up the continuity of the cherished experience of

taking a long hike or run on the remainder of the beach.

My personal observation over the years of the large area of Ocean Beach covered by the current Snowy Plover seasonal limitation leads me to suspect that the limitation has not provided the hoped for benefit in attracting additional Snowy Plovers to the area. At this point I suggest that the current limitation be lifted unless there is reliable evidence of having achieved some positive results. Certainly, the GGNRA should not adopt the proposal of new much greater limitations without some scientific evidence supporting the presumption of a future benefit.

As to Fort Funston, I believe the 2001 closures there have not lent significant benefit to the environment or safety. The Park Service has not achieved the planned native plant restoration goals and is not anticipated to do so for decades. On the other side, the closures have led to a substantial loss of key recreation access to a unique recreational asset ' the only big sand dune in the Bay Area. I used to watch kids play there, and confess to the joy of rolling down the hill myself in foolish middle age exuberance. It is now just a fenced off vacant sand dune area standing as a daily frustration and visible monument to Park Service deviation from the recreational access mandate of the park. The proposed further limitation in the Preferred Alternative renders it a plan that simply can't work. Over-concentrating the off leash use in a smaller area will create conflict problems. Please consider the enclosed comment letter written by my elderly mother to Brian O'Neill during the prior GGNRA closure effort at Fort Funston. The comments precisely hit on some of the unique recreational access assets of Fort Funston. She speaks of the park users "happily ambling along the trails ' all talking with one another companionably ' like a small town." She notes that "It is a pleasure each time I go to Fort Funston to see the wonderful closeness of people to their animals and the pleasure of the owners, the dogs and the observers to whom the situation brings happy memories." Now, eleven years later, that 81 year old lady is in her 90's, and I would hope that I could continue to take her to Fort Funston to let her share the joy of the happy companionship she finds in the park. That, in my view, is necessary component of your efforts to achieve the recreational mandate of the recreation area as a gateway urban park.

Please also consider the enclosed photo sheet of images I took at Crissy Field on Labor Day in 2002. These images reflect the displacement and movement of park users after the dog walking use limitations were placed on the West Beach area. The top two rows of photos are of a congested East Beach full of users including families with dogs. The bottom row shows the nearly empty West Beach where dogs were banned in favor of a hope to attract additional bird wildlife. While I appreciate the incentive and noble effort to attract wildlife to some areas, and enjoy seeing the progress in the lagoon area of Crissy Field, I believe pushing such goals over beach access

results in a substantial improper deviation from the recreational mandate. For that reason I oppose the portions of the Preferred Alternative that further limit off leash access at Crissy Field. I note that the FONSI for the Crissy Field development concluded that there was no significant impact in maintaining the 1979 Pet Policy off leash areas and was based on a condition that any limitation in off leash access would only be made after a public hearing before the Advisory Committee. That FONSI conclusion appears inconsistent with the DEIS.

The DEIS seems to be agenda driven rather than a product of unbiased evaluation, fails to consider the impact on other areas of the GGNRA and on San Francisco parks, fails to consider the enormous cost and difficulty the changes will effect on the GGNRA, fails to consider the impact of driving away a large user group and the resulting deviation from the mandate, fails to consider the psychological and social impact of taking away an key quality of life component, does not appear to have scientific basis for the presumptions upon which the analysis is based and fails to consider potential alternative locations for off leash access.

The easiest and best choice is for the Park Service to shelve the current DEIS and proposed changes and instead continue the current management practice. No change is required.

Sincerely, John Keating

Correspondence ID: 4660 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Overview The NPS claims our dogs are a significant public safety risk even though in reality there is virtually no impact on safety and the DEIS small incident counts aren't even supported by the real GGNRA data. The GGNRA law enforcement data shows only 1% of the park's safety incidents relate to dogs; this is in contrast to 15% of the Bay Area enjoying the park with our dogs, often on a daily basis. For the subset of "bite/attacks" incidents, most are nuisance type incidents involving scratches, bumps, or no injury at all and only a few required medical attention. The Park Service is ignores the major public health and safety benefits of around of the Bay Area exercising, playing, relaxing and socializing with their dogs in the GGNRA. The DEIS also ignores the benefit of responsibly caring for our canine companions and the safety benefits of a well-exercised, social dog. The DEIS also assume that the adverse health and safety impacts will not be simply transferred and amplified to other locations in the Bay Area or into the remaining areas in the GGNRA that allow dogs. The Park Service has misrepresented the "No Action" GGNRA dog-related safety risks in DEIS

justification, the DEIS narratives, in the DEIS impact statements, in public forums, and in the media; this compromises the public's ability to provide meaningful comment on the DEIS. In public forums, the Park Service personnel have demonized dogs and their people with their exaggerated claims that the dogs are a significant safety risk that justifies reducing dog recreation in the GGNRA. This representation is simply not supported by the facts. These misrepresentation can only inflame the irrational fear and dislike that a few people have for all dogs, even friendly family dogs like most of those in the GGNRA; and divides instead of uniting people and in the end discourages all people with or without dogs from going to the GGNRA. The DEIS needs to comprehensively measure and evaluate public health and safety benefits as well as real adverse impacts instead of simply presenting every imaginable bad thing that could remotely occur no matter how remote the likelihood of the event occurring. The DEIS also needs to use an assessment methodology that is more objective and not the DEIS subjective and arbitrary methodology that has allowed for such misuse of power. The assessment methodology should use the same standards as would apply to any activity, whether that is conservation or education or bicycling or hiking or walking with a dog. Based on these unreasonable assessment standards used in this DEIS, the Park Service should not allow anyone to enter the GGNRA because they could catch a deadly disease, encounter an aggressive person or be an aggressive person, or step on a plant. Based on the standards used in this assessment, just the remote possibility is enough for claims of significant adverse impacts. I recommend the following for the revised GGNRA dog management plan:

- ? Determine and provide actual measurements of the existing visitation counts and usage
- ? Comprehensively evaluate and incorporate the public health benefits from dog recreation
- ? Comprehensively evaluate and incorporate the public safety benefits from dog recreation
- ? Determine the scale and type of reductions in GGNRA dog recreation and determine whether other acceptable options are available (e.g., adjacent lands)
- ? Eliminate all exaggerations, misleading statements, and "hypothetical" statements and define a assessment methodology that would be applicable to any recreational activity
- ? Monitor Park Service success in regards to the recreational value and to sound land use management

- ? Proactively work to reduce the existing issues with programs such as the following:
 - o Work with city and county law enforcement vicious and dangerous dog units to develop mechanisms for tracking, reporting and prosecuting owners that have truly vicious or dangerous dogs
 - o Develop dog etiquette, awareness, and other programs with the local humane societies to reduce any existing conflicts (e.g., leash gets the right of way, horse-dog desensitization programs) and to improve the health, safety and recreation value of the GGNRA
 - o Improve safety measures such as poison oak removal on trail beds, signage, etc.
 - o Improve feces collection with signage, bags, and an awareness campaign
 - o Signage, physical barriers or other deterrents

to help prevent cliff incidents and entry into closed areas o Providing adequate voice-control areas so as to encourage people to use those areas and free other areas for anyone that has an overwhelming dislike or fear dogs o Provide special compensations for people with disabilities by allowing them to have well- behaved, voice control dogs on any trail that allows on-leash dogs The Public "Health" Benefits of Dog Recreation

The public health benefits from dog recreation need to be comprehensively evaluated in the revised GGNRA dog management plan.

Benefits of Exercise and Relaxation

The excerpt below from the GGNRA website explains why recreation, including dog recreation, is such an important Public Health benefit, particularly in dense urban areas.

The fundamental value of nature as integral to our health as a species is one of the precepts underlying the establishment of the national park system. As Director Jarvis pointed out in a recent speech at the Harvard School of Public Health, the connections between personal health and parks have been evident since public parks were conceived in the 17th century. A growing body of research has documented the significant health benefits of time spent in nature and exercising outdoors. While certainly not a panacea, parks have the potential to play a major role in addressing the nation's current health crisis reflected in the alarming increase in heart disease, diabetes, and obesity.

In recent years, examples of parks being utilized as places of health and wellness by medical practitioners have begun to appear throughout the National Park System, as well as in state, regional and local parks. From the "Medical Mile" in Little Rock, Arkansas, facilitated by the NPS Rivers and Trails Conservation Assistance Program, to a "Park Prescription" partnership between Porter Health and Indiana Dunes National Lakeshore, to the Children & Nature Network, to the new health-based messaging of the East Bay Regional Park District in the San Francisco Bay Area, medical professionals and parks are beginning to team up for mutual benefit. In September 2010, Director Jarvis established the National Park Service Health Promotion Committee, chaired by Captain Charles Higgins, Director of the NPS Office of Public Health. This committee has planned and organized the Healthy Parks Healthy People US meeting at Golden Gate, and is tasked with helping shape the follow-up to the meeting, and helping explore new opportunities to link the NPS mission to the health of the nation. The NPS Health Promotion Committee has created a web page with information and resources on Healthy Parks Healthy People US. Visit the site at

[www.nps.gov/public health/hp/hphp.htm](http://www.nps.gov/public%20health/hp/hphp.htm)

Forty years ago, Congress and the visionaries for our "recreation area" understood this when they mandated this park "in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning." For people with dogs, the GGNRA is even more critical because so few parks allow dogs and extensive communities have developed in the parks. Proponents of excluding people with dogs from the GGNRA, propose that fenced city dog parks, city streets, or backyards are a substitute for long walks in the outdoors. They miss the point that people and dogs need to MOVE. Such arguments are on par with saying that people don't need these recreation areas at all because there are a few city playgrounds. Yes, city playgrounds are important to small children and the community but they are not a substitute for long walks and communing with nature.

Dogs encourage people of all demographics to get out and MOVE in the outdoors everyday instead of sitting and represent a tremendous opportunity to encourage the 1 in 3 people with dogs to become healthier. Per the 2002 Population Survey, 15% of Bay Area residents already responsibly walk and enjoy the GGNRA with our canine companions and should be the role model for other communities instead of being demonized and exclude from areas that people with dogs have gone since before the creation of the park. Dogs are a catalyst for all people, whether a child, senior, person with a disability, minority to get out in the parks. A trip to Fort Funston on any pretty weekend or evening shows children abound in the park, and the park is full of groups of seniors and people with disabilities walking every morning and evening with their off-leash canine companions. Dogs have a tremendous ability to bridge social barriers and encourage social interactions between other dog people and dog admirers.

2002 Population Survey Indicators Regarding the Impact of Dogs on Healthy Visitation

The "2002 Public Opinion Research Telephone Survey Regarding Golden Gate National Recreation Area Pet Management Issues" was a survey with a sample 1600 people equally divided between Alameda, Marin, San Francisco, and San Mateo County. The visitorship data doesn't support the need for harsh dog restrictions and exclusion. In my opinion, the both the GGNRA population survey and the ranger offenses/incident records consistently support that GGNRA off-leash dogs misbehave infrequently with park visitors.

Overall Park Visitation

It is likely that the GGNRA is grossly understating the overall park visitation

for local residents since the survey averages by county along with 2008 US Census Data indicates 63 million local visits per year with about 26% being visitors with dogs. The average visits self-reported per person in the survey were Alameda 6, Marin 31, San Francisco 48, and San Mateo 11. Overall 15% of the Bay Area population uses the GGNRA for walking our dogs with Alameda 9%, Marin 22%, SF 15%, and San Mateo 13%.

Types of Negative Dog Interactions Reported

There are some public nuisance misbehaviors but they don't significantly impact most park visitors and are probably on par with equestrians, fisherman, bicyclists, sun bathers, disc players, high-energy teenagers, joggers, YMCA sports participants, etc. but those recreational activities weren't evaluated in the population survey.

When asked to explain how off-leash dogs distracted from their experience, fifteen people mentioned poop which is a problem with irresponsible dog owners not the dog behavior. Seventeen people state actual problem events caused by dog misbehavior and none represent a compelling public safety or health risk nor any indication that these events occur on a regular basis: ? splatter sand (2), ? sniff food, ? ate picnic, ? chase bike, ? run at (2), ? knocked child down, ? ran over towel, ? running at, ? jump on (2), ? knock over kite, ? ran rampant, ? disturb other people, ? dog bit off-leash dog (likely both were off-leash) and bleed, ? another off-leash dog interacted negatively with his on-leash dog

San Francisco, with the most off-leash areas and experience, is supportive of off-leash dog recreation:

? Off-leash Support: 54% of San Francisco county supports allowing off-leash dog walking in GGNRA sites

This is impressive considering San Francisco has the most off-leash recreation areas and experience and uses the GGNRA the most and yet is overall the most supportive of off-leash. In comparison, only 41% of all four counties support allowing off-leash dog walking in GGNRA sites. Initially, San Francisco was 57% supportive before they were read the statement: "The mission of the Golden Gate National Recreation Area is the preservation, unimpaired, of the natural and cultural resources, and scenic and recreation values, of the park for present and future generations to enjoy."

? Fear Reduction: 11% of people indicated fear of dogs with the highest being in Alameda (14%) and San Mateo (13%) and the lowest in San Francisco (10%). This 28% reduction of fear from Alameda/San Mateo to San Francisco County supports the hypothesis that more positive exposures

to dogs reduces fear of dogs and/or dogs in SF are safer than in other counties resulting in fewer negative experiences. The data also doesn't indicate that people that fear dogs are not going to the GGNRA locations with dogs. The people that had visited the location in the past 12 months and indicated some level of fear of dogs as a percent of all visitors for the location was: 8%-China Beach (no dogs), 6%-Baker Beach, and 9%-Crissy Field, 10%-Fort Funston, and 10%-Sweeney Ridge (on-leash). Unfortunately, the survey doesn't directly ask people whether dogs change their visitation and, if so, how. I was particularly surprised at the high percentage for Fort Funston.

? Visitation Increases: Owning a dog in San Francisco County increased the number of GGNRA visits per year from 39 to 90, a 131% increase in visits. Visitors with dogs from San Francisco, with an average 27,000 visits per day, visit the GGNRA almost 3 times more on average than the other three counties and represent about 49% of the visits with dogs. Overall San Francisco represents 52% of all GGNRA visits for the four counties. Overall, the average days visited by dog owners over others increased from 21 to 33, a 58% increase.

? Based on those self-identifying themselves as Hispanic, owning a dog (41 visits) resulted in a 130% increase in yearly visits to the GGNRA over people that do not own a dog (18 visits). This was for all four counties.

A large majority of Bay Area residents don't support reducing on-leash sites
? 69% of all four counties oppose reducing the GGNRA sites that allow on-leash dog walking

Note: The three GGNRA park units in San Mateo County only allow on-leash dog walking and because of the compliance rule, these parks will likely soon ban all dogs. Mori Point and Milagra Ridge would initially ban dogs from more than 60% of trails, and the 23,000 acre Sweeney Ridge will ban dogs 100%. For the past 10 years, there have been virtually no GGNRA law enforcement violations, other than leash law violations, and the DEIS presents nothing other than "hypothetical" natural resource impact from dog visitation. San Mateo County residents are heavy users of San Francisco off-leash parks and that will significantly increase if the GGNRA dog management plan passes.

The Public "Safety" Benefit of Dog Recreation

The public safety benefits from dog recreation need to be comprehensively evaluated in the revised GGNRA dog management plan. Well exercised and socialized dogs are a benefit to the community.

Experts in animal behavior such as those at the San Francisco SPCA,

<http://www.sfspca.org/about-us/positions/position-statement-GGNRA> , the Marin Humane Society, <http://www.marinhumanesociety.org/current/dogwalkingrules.html>, and Ian Dunbar http://saveoffleash.files.wordpress.com/2011/04/ian_dunbar_statement.pdf all support voice-control dog recreation. Exaggerated and Misrepresented Public Health Safety Adverse Impacts

The public health and safety adverse impacts from dog recreation need to be comprehensively evaluated instead just listing every imaginable bad thing, no matter how remote the likelihood of an occurrence.

What the Law Enforcement Data Says about Human Injury and Death Risk

Considering the DEIS statistics, the actual GGNRA law enforcement records, the advice of leading dog behaviorists, my own personal experience, and common sense; there is no compelling argument that a few and far between human injuries, mainly nuisance level injuries on the trails and beaches, even comes close to representing a significant public safety issue; particularly since the US is canine rabies free per the Center for Disease Control and Prevention (CDC). Please see http://www.cdc.gov/news/2007/09/canine_rabies.html.

I agree that many nuisance type dog incidents probably aren't reported to the Park Service; most outdoors people and others in the park wouldn't consider them significant. Even a routine falls on the sidewalk or a stubbed toe is a more serious injury than most of the reported dog "bite/attacks". Based on the ranger descriptions with a few "nipping" incidents, I expect many of these non-dog owners reporting the incidents were worried about the risk of rabies more than the actual nick or scrap. Dog owners also probably aren't reporting all the incidents regarding getting a laceration when separating two dogs that are misbehaving, which sometimes results in people needing stitches. These incidents are rare but are on less significant than spraining an ankle when jogging on trails; it's a minor cost of enjoying our favorite recreational activity and responsibly caring for ourselves and our canine companions.

I expect any serious "vicious" or truly dangerous dog encounters or major injury incidents were reported; and those were even rarer in the ranger descriptions on the incidents. The law enforcement data actually shows that GGNRA dogs, particularly the dogs in off-leash areas, are well-mannered probably because of being well socialized and exercised and are far safer than their human counterparts. One of the best quotes that I've heard on the trail is:

"My dog is not off-leash because he is well-mannered; My dog is well-

mannered because he is off-leash".

The actual law enforcement data actually highlights the benefits of the designated and encouraging off-leash areas in the GGNRA. When looking at the details of the dog-incidents, the most serious human injury incidents related to an on-leash reactive dog that got loose and a dog on the side of a high-speed road. If any of the DEIS action alternatives are implemented, the likely result is more of these type incidents since people will be forced to walk dogs more often near traffic and people will have less encouragement and opportunity to properly socialize and exercise their dogs. The most serious bite incident on a human in 2007 and 2008 was from a reactive, on-leash dog. The owner was juggling the leashes and the dog broke loose from the Ocean Beach dunes and got in a fight with an off-leash dog on the tideline. The other owners hand was injured when separating the dogs, and he required a paramedic; per the ranger descriptions that was the only dog that the GGNRA reported to the SFPD dog unit. To me, that case just highlights how important it is to socialize our dogs (like GGNRA dog people do) and, if they are not social, to responsibly manage, exercise, and desensitize them. The other serious human injury was a dog on Quarry Road that was hit by a motorcyclist, requiring immediate medical attention for both the person and the dog.

When it comes to Public Health and Safety, the Park Service should be making the more compelling argument related to the public health and safety benefits of an estimated 450,000 people exercising and enjoying these parks with their dogs and that off-leash and on-leash exercise and socialization is critical for making dogs safe and healthy members of the community. Instead of being condemned by the Park Service, the 1979 Pet Policy should be the role model for other urban parks including the GGNRA new lands acquired after 1979 that have been denied off-leash recreation.

Most Dog "Bite/Attacks" are Nuisance Type Incidents or Minor Injuries '
Living is not without Risk

The Park Service provided PDFs of Ranger and USPP detailed cases for dog-related incidents/offenses (Ranger/USPP Details) based on a Freedom of Information Request by Brent Platter. The years provided included 2007 and 2008 and are at <http://www.nps.gov/goga/siteindex.htm> and the incidents for 2007 are obviously incomplete. In the DEIS on 285, the Park Service states what they have been implying to the public and the media and which is not supported by the DEIS or any of the actual law enforcement data:

"High numbers of incidents occur because of the large number of people that use the site at one time and the high number of dogs off-leash at the site, or non-compliance with the NPS leash regulation that remains applicable to the

many GGNRA sites."

As explained below this is a highly exaggerated statement that demonstrates the Park Service bias and demonization of dogs and people that enjoy recreation with dogs. The Park Service analysis seems to ignore that living is not without risk and that includes recreation. Considering that the 2002 Population survey indicates that 15% of Bay Area residents enjoy recreation in this recreation area park with their canine companions, even without delving into the details, 27 dog "bite/attacks" per year is not a "high" incident rate particularly considering the high visitation for many of these parks. Unlike claimed, virtually all of the injury incidents occurred while people were complying with the leash regulations with the exception of a dog that got in traffic and two incidents that occurred in the parking lot. Two other incidents related to tied-out dogs. Unfortunately, all recreation activities have risks but walking and playing with a dog is one of the safest active recreation activities available. Encouraging San Mateo County people to drive all the way to San Francisco for off-leash recreation, probably result in a more serious safety risk just by increasing the risks of a lethal accident on the highway.

After 5 years of being in the GGNRA almost daily with a dog, I've had 100,000s of happy dog interactions, and I'm certainly more concerned about poison oak, a bee sting, or tripping than any of the friendly GGNRA dog. My biggest dog worry is keeping my dog away from the few dogs lunging and barking on leash at my dog.

Based on the 2007 and 2008 Ranger/USPP Details, I found the following accounts of actual human injuries and other animal and safety related incidents for the two years that should represent all of the "bite/attack" and hazardous condition incidents:

16 Trails/Beach Human with Injuries 2 non-owners that were nipped by OFF-leash dogs resulting in minor welts or scraps (1 jogger and 1 beach goer) 2 non-owners hikers that were nipped by ON-leash dogs resulting in minor welts or scraps 5 non-owners bumped either from OFF-leash playing dogs or dogs jumping up on them (3 children, 1 bicycle, and one adult on the beach) 5 dog owners with bite wound or lacerations from separating dogs with some requiring stitches 1 fisherman with a minor thumb puncture caused by a fish hook when baiting the line and a dog run into the fishing line 1 horse incidents with a rider thrown 1 NPS maintenance person that was bit on the knee and showed redness but no broken skin (unattended/tied up dog on a 20 foot lead)

3 Non-Trail/Beach Human Injuries

1 motorcyclists was injured from hitting a loose dog in traffic on Quarry

Road 1 child was bite on the lip by a tied up dog at a business 1 skateboarder had a puncture wound/bruise on the arm from an on leash dog that lunged at a passing skateboard on the sidewalk

32 Other Animal and Safety Incidents

1 horse and buggy incident on the Ocean Beach with the horse having puncture bites on the nose 7 dog-dog interactions resulting in non-lethal injuries (1 grab/shake and 6 with scraps or lacerations) 1 dog cliff fall with serious injuries requiring aid being carried up from the beach (Fort Funston) 5 dog cliff rescues from dogs stranded on cliffs with no injuries (1 Sutro Baths, 1 Fort Point, 3 Fort Funston) 1 dog barking at a Park Service policeman on a horse 1 dog charging and grabbing the boot of a Park Service policeman (Illegal camping by a Washington resident with an outstanding warrant) 9 incidents of dog owners complaining about inappropriate dog-dog interactions (no injuries) 3 complaints about people not liking dog interactions (no physical contact with a dog) 4 stray dogs friendly dogs with no indication of aggressive or fearful behavior

DEIS "Action Alternatives" Increase and Shift Public Safety Risk

Note that the DEIS "Preferred Alternative" and other "Action Alternatives" will not eliminate most of these incidents and may actually increase the safety incidents even in the GGNRA by concentrating more dogs and people in an even smaller area. The only way the DEIS Preferred Alternative, in comparison to the "1979 Pet Policy", would reduce these incidents in the GGNRA is if people with dogs choose to not go to the GGNRA to walk with their dogs and the recreational value of the GGNRA is diminished. If people choose not to go to the GGNRA and choose to continue living in the Bay Area, their dismal options include:

? Continuing to responsibly exercise and socialize their dog, which means the public safety risks is merely shifted from the larger GGNRA sites to more concentrated and less appropriate urban streets, urban parks, other more distant regional parks, or other, unauthorized, urban areas.

? Become unmotivated to provide responsible daily exercise and socialization, which means the community will not have the safety benefit of this exercise and socialization for dogs. This will lead to: o more frustrated and unsocialized dogs (e.g., backyard barking, escaping from backyards, lunging/barking when on leash, jumping on people, etc.) o more fearful, vicious and dangerous dogs in people's homes, in backyards, on city streets, or as strays o more babies and children receiving serious injuries from unsocialized and frustrated dogs o more new born infants entering homes with family dogs completely unsocialized to babies o more stigmatization of

dogs because of irresponsible dog owner care

? Abandoning or euthanizing their dogs, which not only impacts the dogs, but also the health and well-being of people and the community

In my opinion, keeping an unsocialized and frustrated dog in a home is not humane and is the equivalent of keeping a loaded gun. Only euthanizing dogs or people choosing not to have dogs would truly reduce the overall public safety risk related to dog ownership. In my opinion that is an extreme and unnecessary alternative considering the benefits people and the community receive from our canine companions, particularly considering the overall low safety risk related to responsible dog ownership.

The 2001 to 2010 GGNRA Law Enforcement Records (Ranger/USPP Headers) list all of the reported incidents/offenses (incidents) with the ranger or USPP officer's brief description of the incident. The Ranger/USPP Headers do not indicate a significant number of safety-related incidents from dog recreation. I summarized and categorized the Ranger/USPP Headers, and found that between 1 and 2 percent of GGNRA safety-related incidents were dog-related. These incidents include incidents at all GGNRA sites not just the sites covered by the DEIS plan. These counts seem insignificant considering some 15% or 450,000 people in the Bay Area enjoy walking their dogs in the GGNRA (estimated from the 2002 Population Survey and 2008 US Census Report) and the nuisance type severity of most dog-related incidents. The level of severity for most other incidents is unclear from the Ranger/USPP Headers; however, it is reasonable to assume that the overall severity of other incident categories is much greater and include more life threatening injuries and even death. Some highlights of the counts of some other safety related categories for 2007 to 2008 includes: 11 Bicycle & Motor Vehicle Accidents 66 Bicycle Injuries 272 Other Accidents 156 Assaults 18 Deaths 13 Suicide Attempts or Suicides 53 Domestic Disputes 531 Other Injuries What the Law Enforcement Data Says about Dog injury and Death Risk

In looking at the 2001 to 2010 Ranger/USPP Headers, I only saw one case of a dog death reported in the Ranger/USPP Headers, which indicates the death risk is low for dogs. Even though these death incidents almost never happen, there needs to be a standard process and legal mechanism, which will help prevent repeat incidents and ensure the risk is accurately presented. In the detailed 2007-2008 Ranger/USPP Details of dog-related ranger/USPP tickets, there were two cases where the bite incidents were reported to the ACC/SFPD. In the Ranger/USPP Details, only 7 other dog-dog incidents reported any injury to a dog in the two years.

Mechanisms for identifying and Making individuals Accountable for Serious

injuries

A woman, at the Supervisor's meeting, that was injured while riding indicated that the GGNRA does not have mechanisms for identifying and holding the owners accountable for any serious injuries caused by their dog. The GGNRA should work with the SF Animal Care and Control and the San Francisco Police Department and other local law enforcement agencies to develop procedures for dealing with such incidents within San Francisco and also within other counties. Most dog "bite/attacks" are more nuisance type incidents but there are more serious incidents that require more comprehensive procedures particularly to deter repeat offenders.

Park Service Misrepresents Dog-Related Safety Risk

In addition to these broad claims, Park Service cannot substantiate even the low number of incidents in the DEIS. Please see Appendix 3: e-mails Supporting Park Service Inability to Support DEIS Law Enforcement Counts in my public comment regarding Environmental Injustice. I attempted to verify the counts using the Ranger/USPP Details and the Ranger/USPP Headers and neither provided support for the dog "bite/attacks" counts, particularly the 17 reported for Stinson Beach in 2007 on page 272 of the DEIS. There is no evidence of any "bite/attacks" at Stinson Beach during 2007 or 2008, and yet this one DEIS number represents 32% of the total DEIS count (53) for all of 2007 and 2008 dog "bite/attacks". Overall, I was only able to find 51 incidents that seem to qualify as a "bite/attack" or hazardous condition versus the 119 shown in the DEIS. In addition, the DEIS shows that "bite/attack" and hazardous condition incidents dropped 45% from 77 in 2007 to 42 in 2008 without any apparent reason. I requested the schedule of the Ranger/USPP Details that substantiated the counts and was told there is no schedule, which indicates either a lack of professional care or deliberate manipulation of the data.

I was unable to review every single word of the Ranger/USPP Details for Stinson Beach area closed to pet PDFs but suspect the 334 Area Closed to Pets incidents for 2007 are also inflated since the Ranger/USPP Headers only indicates 51 incidents. The 334 for Stinson Beach is 64% of the total 518 Area Closed to Pets incidents on page 230 of the DEIS. Overall, the DEIS is showing 2008 counts for all locations to be 42% less than 2007 without there being any reason for such significant changes.

Also note that the Park Service file containing the 2008 Ranger/USPP Details contains almost 880 pages. While there are many duplicate pages the number of pages seems reasonable. The Park Service file with the 2007 Ranger/USPP Details contains only 93 pages but is supposed to represent 42% more incidents. While there are many duplicate pages in the 2008 file the number of pages seems reasonable. In addition, I only found 15

Ranger/USPP Details for 2007 Ocean Beach leash law violations in comparison to the 240 indicated by the Ranger/USPP Headers.

GGNRA Area : Crissy Field 385 Tennessee Valley 151 Fort Funston 122 Mori Point 105 Sweeney Ridge 84 Stinson 74 Other 758 Ocean Beach Grand Total 572 Dog Related Incidents 2251

Almost all these incidents relate to Failure to Leash and Area Closed to Pets violations that have little to do with public safety concerns.

Purely Subjective Adverse Impact Statements Leads to Abuse Eliminate all exaggerations, misleading statements, and "hypothetical" statements and define a assessment methodology that would be applicable to any recreational activity.

Incomplete Impact Scope

The public health and safety impact statement should be changed to "Beneficial" for all GGNRA sites for the "No Action" alternative and public health and safety should be considered a major justification for honoring the 1979 Pet Policy and adding addition off-leash areas in San Mateo County in the revised GGNRA dog management plan.

The Assessment Methodology for Public Health and Safety provides no standard other than Park Service judgment and how many "potential" problems could occur. The entire DEIS Public Health and Safety section, like the rest of the DEIS, reads like a "Witch Hunt" with all these horrible things attributed to dogs without their being any evidence that the events are occurring in the GGNRA, just like the way witches were prosecuted by Salem courts in the 17th century. This section is designed to create unnecessary paranoia instead of reasonably showing the risks and the effect of those risks.

Without any real standards for impacts, the Park Service could arbitrarily eliminate all recreation and all people from the GGNRA. Just because something can happened doesn't mean it is likely to or that it is a significant safety or health risks. The dogs have been in the parks for decades and only rarely is there a significant injury, and there is no evidence that dogs are transmitting diseases to humans or the wildlife in the parks. On the other hand dog recreation provide systemic health and safety benefits that are ignored in the DEIS.

Safety in the Park In particular, there is no public health and safety epidemic related to dog feces or dog pathogens. Even in the unlikely event that people contract these diseases the odds of serious medical issues is negligible and certainly not any more severe than pathogens from other sources, such as

wildlife droppings and city street run-offs, in the GGNRA. Per the Park Service response to my FOIA request, the Park Service has no evidence of pathogen transmission in the GGNRA and is purely relying on listing of possible dog related diseases. Certainly, the 1 in 3 families in America with dogs, do not deem these to be significant risks that would cause them to not associate with dogs.

The Park Service has merely compiled a list of all the harmful things that could happen in regards to dogs and shown the low Law Enforcement numbers to show the severity of actual dog related incidents. Based on these standards all human activity in the GGNRA could be deemed a significant Public Health and Safety risk because just entering the park one could come up with 1000 of potential things that could happen. Certainly, the list of potential life threatening diseases transmitted from one person to another, violence from one person to another, or accidents that could occur and are far more significant than any risks regarding dog interaction. In fact, the law enforcement data above only shows that dogs are a minor, if not negligible, risk in comparison to the GGNRA accidents and violence associated with other human activities.

Exercise and Mental Well-Being Benefits In addition, these standards completely ignore the beneficial impact of walking with a dog and enjoying the park. Note that it is highly unlikely the few people that fear or dislike dogs are reducing their exercise in the outdoors to offset the increase in people with dogs exercising in the parks. People with dogs have far fewer options and few can afford to go to a fenced dog park and then go for a long walk somewhere else. Unfortunately, the GGNRA has not conducted any real studies of recreation needs or barriers to scientifically comprehensively model the expected impact on visitation and exercise levels.

Safety Benefits from Responsible Dog Care The impact statements and analysis ignore the safety benefits of a well exercised and socialized dog.

Safety Benefits from Local Recreation Having open space available close to home reduces the need for car travel and reduces the risk of accidents and pollution.

Adjacent Areas or Concentration The impact statements ignore impact of these any safety risks being transferred to people's homes, city streets, city parks, and other locations. Unless people euthanize their dogs and stop getting dogs, the dogs aren't going away so any risk to the community is only going to be transferred to other locations that will now have a greater concentration of dogs. The DEIS also talks about the issues being caused by a high concentration of dogs but is proposing with this plan to further concentrated the off-leash and on-leash dogs in smaller areas but is not

accounting for this in their impact analysis.

Subjective Public Health and Safety Criteria Excerpt from DEIS Page 1592

ASSESSMENT METHODOLOGY

The analysis of effects on human health and safety considered conflicts between dogs and various user groups of the park. The presence of dog waste at park sites was also included in the analysis. Impacts on both park visitors and park employees were analyzed quantitatively using the palls LE database on pet-related citations, warnings, and reports taken in 2007-2008, which is summarized in table 9. Qualitative analysis considered the LE database along with information from relevant studies, personal communication, and professional judgment to predict risks in human health and safety over the next 20 years.

IMPACT THRESHOLDS

Health and safety impacts were determined by examining the potential effects of dog walking activities on the health and safety of park visitor and staff within a park site. The intensity of each adverse impact is judged as having a minor, moderate, or major effect. A beneficial impact would be a positive change in the condition or appearance of the resource. Negligible impacts are neither adverse nor beneficial, nor long-term or short-term. No impacts to the health and safety of park visitors and staff may also be applicable for some alternatives and sites if dogs are prohibited. The following impact thresholds were established to describe the effects to the health and safety of park visitors and staff under the various alternatives being considered:

Beneficial A beneficial impact is a beneficial change from the current condition and is a relative indicator of progress compared to the no action alternative. In general, a beneficial impact would be a decrease in the number of dog-related confrontations, injuries, and illnesses.

Negligible The health and safety of both park visitors and park employees would not be affected, or the effects would be at such low levels of detection that no appreciable effect on human health or safety would be measurable.

Adverse Minor. Effects on the health and safety of both park visitors and park employees would be detectable but would not be large enough to be quantified.

Moderate. Effects would be readily apparent and would result in substantial, noticeable effects on the health and safety of both park visitors and park employees on a local scale. Revision of park policies could be required to

ensure human health and safety.

Major. Effects would be readily apparent and long term and would result in substantial, noticeable effects on human health and safety for both park visitors and park employees on a regional scale. Revision of path policies would be required to ensure human health and safety.

The adverse impact statements claimed in the DEIS are arbitrary and subjective, even if one doesn't consider the cumulative impacts on Public Safety (e.g., dog behavior, other adjacent lands, health benefits, responsible dog guardianship, etc.) with not clear explanation for the differences (e.g., number of past incidents, number of visitors, etc.) Below is a table showing the highest level impact claimed in the DEIS in Table 5. For example, there seems no justification for listing Milagra Ridge and Pedro Point as Minor while Sweeney Ridge and Mori Point are negligible. In fact, even using the questionable numbers on page 271, no location other than Stinson Beach and Fort Funston have more than ten combined dog "bite/attacks" and hazardous condition incidents. In reality, only Fort Funston and Ocean Beach, with more than 2,000 average daily visits, had any serious incidents in 2007 or 2008 on the trails or on the beach.

Subjective Visitor Experience Criteria

Excerpt from DEIS Page 1402, on the Assessment Methodology for Visitor Experience:

IMPACT THRESHOLDS

Visitor Use and Experience impacts were determined by examining the potential effects of dog walking activities on the visitor's experience within a park site. The intensity of each adverse impact is judged as having a minor, moderate, or major effect. A beneficial impact would be a positive change to visitor experience. Negligible impacts are neither adverse nor beneficial, nor long-term or short-term. No impacts to visitor use and experience may also be applicable for some alternatives and sites if dogs are prohibited. The following impact thresholds were established to describe the relative changes in visitor use and visitor experience under the various alternatives being considered:

Beneficial A beneficial impact would be a positive change to a visitor use or experience at a park site. Individuals participating in that use or experience in other local or regional areas could return to or begin using the park due to the markedly improved visitor experience as a result of implemented dog management. A beneficial impact is a beneficial change from the current condition and is a relative indicator of progress compared to the no action alternative. Negligible Visitors would be unaware of impacts associated with

proposed changes. There would be no noticeable change in visitor use and experience or in any defined indicators of visitor satisfaction or behavior. Defined indicators that may impact visitor satisfaction include greater safety concerns, additional user conflicts, and additional dog-related incidents such as dog bites or dogs chasing or jumping on visitors.

Adverse Minor. Changes in visitor use and experience would be slight and detectable, but would not appreciably limit or enhance any critical characteristics of the visitor experience. Critical characteristics of the visitor experience include overall visitor satisfaction, visitor safety, and recreation opportunities. Other park areas would remain available for similar visitor uses and experiences. Visitor satisfaction would remain stable.

Moderate. A few critical characteristics of the existing visitor experience would decrease. The number of visitors engaging in a specific use would be altered, resulting in a noticeable change in visitor satisfaction. Other park areas would remain available for similar visitor uses and experiences; however, some visitors participating in that use or experience might be required to pursue their choice in other available local or regional areas.

Major. Multiple critical characteristics of the existing visitor experience would deteriorate, or become unavailable and/or the number of visitors engaging in a use would be greatly altered, resulting in a noticeable change in visitor satisfaction. A limited number of park areas would be available for similar visitor uses and experiences; thus, large numbers of visitors participating in that use or visitor experience would be required to pursue their choice in other available local or regional areas. The Assessment Methodology is arbitrary and based on judgment without any objective measurement criteria. There were not objective studies done to determine the significance of dog recreation visitation or the experience by those that dislike or fear dogs. In addition, the introductory statement below says that visitor surveys were conducted but the Park Service could not provide a single visitor survey as requested in my FOIA.

Excerpt from DEIS Page 1402, on the Assessment Methodology:

Visitor use and experience can be measured by the indicator visitor satisfaction. Visitor satisfaction is measured by visitor satisfaction surveys distributed at various sites throughout the park. The potential for change in visitor experience was evaluated by identifying projected increases or decreases in on-leash and voice-control dog walking and other visitor uses per alternative, and determining whether these projected changes would affect the desired visitor experience and result in greater safety concerns or additional user conflicts.

The Visitor Experience needs to be based on more than arbitrary conclusion

that dog have a significant impact on a substantial number of people that fear of dislike dogs. I don't golf, play tennis, ride horses, play basketball, use the GGNRA gym but I'd expect any plans to close those GGNRA facilities would be based on a valid argument that the those areas would benefit a greater number of people with the alternative plan and not be simply that there are people that don't use this particular facility. For example, I'm any outdoors person that had lived in the Bay Area for about 10 years but I'm pretty sure I only stopped at Fort Funston at most once before I got a dog. With our without the dogs, Fort Funston is not a major destination for most people without dogs. Certainly Fort Funston is a cultural landmark or mecca for the dog community.

Appendix 3: Highlights of Relevant Personal Background ? Lived in the Bay Area for 17 years and am an avid outdoors and nature lover that has frequented many National Parks, National Forests, and most of the parks in the Bay Area. Before Ella, a dog, joined the family, I visited National Park Service parks including Yosemite, Yellowstone/Grand Tetons, Lassen, Glacier, Grand Canyon, Redwood, Point Reyes, Pinnacles, Zion, Bryce, Death Valley, Canyonlands, Channel Islands, Denali, Dinasauro, Sequoia/Kings Canyon, Mesa Verde, Muir Woods, Natural Bridge, Padre Island, Rocky Mountain, and SF Maritime. Since Ella joined the family, we have not been to a park, other than the GGNRA, that is managed by the National Park Service because dogs are not allowed beyond the main park corridor (e.g. the campgrounds and parking lot and superficial trails). Not being able to visit the National Parks is one of the hardest things about having a dog as a part of the family. ? Frequent the GGNRA dog-friendly sites almost daily for 5 years since Ella, an Aussie, joined our family with most GGNRA visits to Sweeney Ridge, Mori Point, Fort Funston, and Milagra Ridge. Before getting Ella, Sweeney Ridge was the only one of these GGNRA sites that I had visited more than once in 12 years in the Bay Area. Instead we tried to always go to new open spaces during our weekend hikes with Sweeney Ridge and Sawyer Camp / San Andreas / Canada Road trails being standard hikes/runs/bike that we did 4 or 5 times a month. We also had gym memberships which we no longer have since we can't exercise Ella and go to the gym. We find hiking so much more rewarding with Ella; we interact with so many more people because having a dog, like having a small child, facilitates social interactions that rarely happened without a dog ? Spent the past four months canvassing the GGNRA and other dog-friendly locations talking to people with dogs and raising awareness of the GGNRA plan. This included many discussions regarding the experiences and needs of people with dogs ? Co-author of the SaveOffLeashDogs Call to Action weekly email regarding the GGNRA dog management plan and active member of the SaveOffleash coalition with primary responsibility for grass roots organizing for San Mateo County, SFDog, and Ocean Beach Dog ? Member of the Peninsula Australian Shepherd Club, the Australian Shepherd Club of America, Ace Dog Sports, and the Bay Team (an agility

organization) ? Over 20 years of experience as an auditor in public accounting firms and corporations and a Masters in Accounting Information Systems and a Bachelors in Agricultural Economics/Accounting ? Graduate of the SF SPCA Dog Training Academy, a six week intensive program taught by Dr. Jean Donaldson, a nationally recognized dog behaviorist ? SFSPCA volunteer trainer responsible for addressing more significant behavioral issues such as reactivity, fear, rude behaviors, and puppy socialization ? Grew up on a farm with a virtual zoo of animals related to this plan including dogs, horses, mules, deer, quail, geese, and ducks and in a rural areas with significant wildlife populations ? Read the 2200 Page DEIS and visited all but 3 of the 21 sites included in the plan plus visited the new lands at Rancho Corral de Tierra in Montara ? Analyzed the 2001 to 2010 GGNRA Law Enforcement Access data headers and the 2007 to 2008 pet-related cases in the PDFs ? Reviewed the available GGNRA inventories and monitoring reports provided by the GGNRA related to a Freedom of Information Act request ? Rely on the GGNRA for daily walks to help prevent morbid obesity, diabetes, heart disease, and breast cancer , which is prevalent in my family as well as stress relief ? Rely on GGNRA to responsibly care for Ella, our dog, and for ensuring that she is a healthy and safe dog for the community and for those visiting our home ? Committed environmental advocate for addressing real issues that make the world a healthier and happier place for all our interconnected beings. Member of the Sierra Club

Correspondence ID: 4661 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Melinda Rosenberg and I live in the SOMA neighborhood in San Francisco. My dog Bianca and I enjoy the GGNRA, specifically Fort Funston and Crissy Fields, 2-3 times a week. Because I live in a small studio apartment it is important to me and Bianca to be able to enjoy all that the GGNRA have to offer. From the day I brought Bianca home I start training her to respond by sight and voice when not on her leash, I am a responsible dog owner and never allow Bianca to go into restricted areas. The wildlife and vegetation in these wonderful parks are very important to both of us therefor I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options (besides restricting dog- walking access) should be considered first. For example, it is not clear where dogs are allowed. I think the GGNRA should provide better signage and create environmental barriers, such as the vegetative barriers surrounding the tidal marsh at Crissy Field or the

restored dunes at Fort Funston.

As a responsible pet owner and advocate for animals, I know it is crucial that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well-behaved dog. Having places where I can take long walks with Bianca allows me to get the exercise I need while also meeting my dog's needs. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dog and dog guardians will not have sufficient opportunity to exercise and recreate.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts -other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors.

The DEIS needs to provide full disclosure to the public and decision makers. If dog- related disturbances are having a Significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem noted. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone - so that an informed decision can be made.

1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition,

the DEIS does not provide site- specific information that these areas are inappropriate for continued dog walking.

Sincerely, Melinda Rosenberg

Correspondence ID: 4662 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Isabelle Beekman. In my sixties, I have lived in Pacific Heights for twenty five years. My fabulous spinone Raphaelo goes to Crissy Field every day of the week with my family or his dog walker.

Having a dog is such a wonderful way of life. Raphaelo is a puppy; he rings joy to many people with his goofiness and joie de vivre. To watch him running down the beach after his squeaky toy, or diving into the waves is an incredible mood lifting experience and a de-stressor.

In my family, we take the responsibilities of owning a dog very seriously. Raphaelo and I have taken three back to back dog training classes. Moreover, he has worked one on one with a professional dog trainer. I am proud to say his recall is excellent as is his ability to stay and heel. A dog carrying bag is always part of our gear with poop bags, treats and toys. In addition to picking up after Raphaelo, we also pick up garbage, dead birds and anything else we can manage to protect the environment. We keep Raphaelo out of the fenced areas, as protecting the snowy plover is important to us. As I understand it, the same birds have returned year after year, not feeling threatened by the running dogs.

To keep a dog and his owners happy and healthy, the dog must have access to off leash walking. For me and my dog walking friends, going to Crissy Field is a necessary part of our day. We love the place and so do our dogs.

Instead of taking away off leash areas, I think the GGNRA should consider adding new areas, and providing better signage and environmental barriers like the ones at Crissy Field. The draft Dog Management Plan and the Draft Environmental Impact Statement does not evaluate the value of these recreational activities and does not adequately consider alternatives such as environmental barriers and providing better signage and education to the public.

Moreover, there is inadequate consideration of the impact of restricting off leash dogs on east beach at Crissy Field on the families that gather there for

recreation. Both of my children grew up sharing Crissy Field east beach with their first dog. During many months of the year central beach is not safe because of the high tides. The proposal does not adequately investigate the impact on families of having to use Central Beach year round rather than east beach. There is also no science based explanation for moving off leash dogs off east beach. Please evaluate these alternatives and impacts. Major urban areas such as San Francisco need more places to recreate with dogs off leash, not fewer.

The GGNRA was created with the purpose of providing recreational opportunities for people. This includes off leash walking at sites like Crissy Field. The citizens of San Francisco benefit greatly from these opportunities. Please do not restrict off leash walking on these sites.

Respectfully, Isabelle Beekman

Correspondence ID: 4663 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Eunice Lee and I am writing to you as a concerned San Francisco resident regarding the proposed changes to the current GGNRA off-leash dog areas. I regularly take my dog Elle to Chrissy Field in the Marina District where we currently reside, and we also frequent the wonderful off-leash areas of Ocean Beach and Fort Funston. As a responsible dog owner, I believe it is important for my dog to be able to run and play with other dogs in open, natural spaces. I believe it is equally important to keep my dog under my control at all times, to keep her out of protected wilderness areas, and to clean up after her. In my experience, the vast majority of other dog owners that I have encountered in these GGNRA areas are likewise mindful of their dogs and respectful of their surroundings.

For the following three reasons, I do not agree with the GGNRA's proposal of eliminating many off-leash dog walking areas. First, while I am concerned about the long-term preservation of the GGNRA's natural resources, actual impacts from dogs at GGNRA sites must be shown before such drastic remedial measures are implemented. Currently, the DEIS is woefully lacking in actual documentation of its assumptions regarding negative resource impacts from dogs in specified GGNRA areas. For example, at some sites, the DEIS would prohibit dogs from beach areas in order to protect shorebirds and stranded marine mammals, yet the DEIS is devoid of studies or statistics documenting the actual impact on shorebird or marine mammal caused by dogs at these sites. Specifically, the DEIS must

assess and modify the selected alternative for each GGNRA site based on site-specific issues. Alleged impacts should be evaluated, and each GGNRA site should be assessed individually to determine the proper alternatives based on documented-not merely asserted--effects.

Second, in addition to the benefits to the dogs themselves, it is equally as important for the welfare of dog owners in this city to be allowed to utilize these areas with their pets. Without access to the already limited amount of land in the GGNRA we currently have, I am very concerned that once their dogs are restricted, many dog guardians will not have sufficient opportunity to exercise and recreate. The DEIS fails to recognize the fact that areas within the GGNRA serve as much needed safe outdoor space to the residents of the San Francisco Bay Area, an otherwise bustling metropolis. In fact, many areas of the GGNRA are located in or next to urban neighborhoods, but the DEIS refuses to factor the quality of the urban environment in its analysis and instead disputes its significance. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the DEIS is required to study, but fails to do.

Finally, the DEIS as drafted would have one believe that any recreation (including dog walking) harms natural resources. This ignores the fact that people with dogs are often very conscientious about the environment. In fact, the off-leash places I frequent with my dog are much cleaner than places where people, not dogs, run rampant. There is vastly less loitering, crime and litter in these dog-friendly places. To the extent there are those dog owners who are less conscientious than the rest, the draft plan has the effect of punishing the vast majority of the environmentally conscious and respectful dog owners for the failings of a few. The more appropriate solution should be to educate visitors, improve signage, and punish actual violators-and not put a blanket ban the rest of the residents with dogs from the GGNRA.

Sincerely, Eunice Lee

Correspondence ID: 4664 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

We were part of the original group that established the Crissy Field Dog Group at Joan Booth's house over 10 years ago. We helped organize the

protest at the Golden Gate Club around 2001 including notifying the NPS police of the anticipated large turnout. Nearly all of the original CFDG members are no longer involved in the organization, partially because the many public meetings stretching over 8 years were so unproductive, but mainly because the very small group of CFDG's current leaders won't listen to reasonable compromises. Their insistence that the Promenade should be a ROLA defies all logic. Most of us would like to see the East Beach open in the early morning, particularly for the adjacent residents during the week; however, we understand this could be a management issue. An informal survey of weekend dog walkers, including a lot of former CFDG members, support the above position.

We want to be sure that NPS will partner with the CFDG to guarantee that the preferred alternative will never be rescinded. You must agree that dog litter at Crissy Field has been greatly reduced in the last 10 years, partially because of the pickup bags provided by CFDG at numerous locations. Most CFDG members even clean up after the dogs of tourists or inconsiderate local dog owners.

The draft EIS indicates there will be a huge increase in the budget for policing dogs. Hopefully this is not a subterfuge to achieve Yosemite standards of no dogs. Many years ago I worked on the planning for a police/fire station at 35 Keyes in the Presidio and I know first hand the efforts of police leaders to create huge many layered bureaucratic organizations with lots of policemen. We would hope that you would instruct officers to talk to offenders and only issue tickets as a last resort to repeat offenders. Signage needs to indicate an enforceable standard for "voice control" such as 30 or 60 seconds. If the NPS wants the off leash area to be successful for us dog owners I would hope that tickets would only be issued on very rare occasions and the rules be loosely enforced, especially at the Central Beach and early mornings or late afternoons at the East Beach.

We need clear well placed signage to make the preferred alternative work. Wherever parking is available there must be signs. Signs at the lagoon bridge would be effective.

At the many paths which access the Central Beach we need signage indicating this area is reserved for off-leash dogs. The signage plan should be coordinated with CFDG and offered to the public for review.

Again, thanks for coming up with a reasonable preferred alternative for dog management at Crissy Field.

Yours very truly, Bill and Ursula Moffett

ID:

Received: Jun,01,2011 00:00:00

Correspondence Letter

Type:

Correspondence: Dear Superintendent Dean:

On behalf of the National Parks Conservation Association and its more than 340,000 members across the country and more than 49,000 members in California, I am writing to submit comments on the Golden Gate National Recreation Area's (GGNRA) dog accommodation management plan (DEIS).

The GGNRA is considered by many to be one of our country's boldest park experiments: setting aside highly-prized land to provide a national park experience near a heavily urbanized area. The park is home to more endangered and threatened species than any other park in the continental U.S.--more than Yellowstone, Yosemite, and Sequoia & Kings Canyon combined. It is a world-class repository and it boasts the second-largest archival and museum collection in the National Park System, which tells the cultural and historical story of the area.

Typically, recreational activities in our national parks are subject to management actions guided by park policies. This is done for several reasons, including fulfilling the resource protection goals of the park, complying with park regulations, and providing a visitor experience consistent with law and policy. For example, inappropriate activities such as motor vehicle use on GGNRA beaches were banned as they conflicted with park policies and values. However, the GGNRA has failed to regulate and bring law and order to the recreational activity of dog-walking. Unfortunately, the current reality is that there is limited, if not no ability to regulate and enforce this recreational use that is known to disturb wildlife like western snowy plovers and harass other park users, such as horseback riders and picnickers.

The current status-quo fails to provide equity to park users, as there are limited areas in the GGNRA, San Francisco specifically, where one can have a dog-free experience. Currently, if a family would like to have a dog-free beach experience in GGNRA, only one beach in the GGNRA, the small China Beach, allows for it. Additionally, other user groups, such as those with service dogs, have stated their concerns with off-leash dog use. One survey from Guide Dog Users, Inc. concluded that 89% of guide dog users report off-leash dogs interference with the guide-owner team and 42% report physical attacks on the guide-and-owner team.

For the reasons of wildlife protection, equity in park access, and the unfortunate current status of no law, order and enforcement, we support the NPS in its efforts to regulate and accommodate recreational doE., walking.

We believe that "Alternative D" is most consistent with law and policy, and best aligned with national park values. We do not support the GGNRA's "preferred alternative" and believe that implementing such an alternative will not resolve the current management problems that exist.

The following are over-arching comments for dog-walking within GGNRA:

The park's mission is to protect the natural and cultural resources, and allow recreation that will not undermine them. Alternative D best reflects this mission.

2. The park should better accommodate diverse park user groups, such as runners, horseback riders, families, and those with service animals by offering more than one trail and more beach areas free from dog recreation.

Require all off-leash areas to be enclosed to protect park users, wildlife, and other dogs. See letter from ASPCA.

4. Limit off-leash recreation to areas where it will not have negative impacts on sensitive wildlife and habitats.

5. Provide more trails that are free of dogs (currently only 1 trail in San Francisco will be available for those who do not wish to interact with dogs).

6. The NPS should not permit commercial dog-walking as such a use does not appear to be permissible under law and policy guidelines. Additionally, commercial dog walking (with each walker having up to six dogs) will negatively impact park resources and visitors, will not provide public service or benefit to visitors, and is contrary to guidelines on private, commercial use of national parks.

7. Compliance based management is an efficient and practical way to implement adaptive management and ensure that the NPS is able to adapt based on pet owner behavior.

. The compliance rate should be at least 95%, not 75% as outlined. A 75% means that more violations will be tolerated, thus preventing other dog walkers from observing what the correct rules are. Such a high rate of tolerance works against visitor education of the correct rules. The GGNRA should implement a higher standard of stewardship by aiming for an "A" and not a "C" grade.

9. NPCA supports and agrees with the comments by Save Our Seashore (see attached). Save Our Seashore identifies significant shortfalls with the GGNRA's compliance-based management theory and outlines how it will

need to be improved.

Thank you for this opportunity to provide comments on the DEIS. We thank the NPS for its efforts to improve management of this recreational activity that is negatively impacting wildlife and other park visitors. We look forward to seeing how the NPS addresses our concerns and comments.

Sincerely, Neal Desai Associate Director, Pacific Region National Parks Conservation Association Attached: DEIS comment letter from Save Our Seashore

Correspondence ID: 4666 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean -

I have the following comments on the Dog Plan Draft Environmental Impact Statement (DEIS). It is obvious that the people who developed the alternatives for this project have no experience recreating with dogs in the GGNRA. I am a regular user of Fort Funston, Ocean Beach, and a frequent user of Crissy Field and Great Meadow. I also go to Mori Point occasionally. I always bring my dog as he is my motivation to get me out into nature and open spaces. As a result, I am more active and he has been a tremendous benefit to my health and fitness. This plan will severely impact my life without a concomitant environmental benefit. Substantial changes are needed.

This plan seems like a solution in search of a problem. There is simply insufficient information to warrant the limitations that would be imposed on dog recreating. While there may be some impacts to wildlife and visitors who don't like dogs, the data here does not reveal that these are significant problems - i.e. - that dogs specifically are a significant contributor to impacts wildlife are experiencing, or that a significant number of people want to eliminate dogs (only 13% of those surveyed indicated a concern with dogs).

The preferred alternative is extreme and seems to use a sledgehammer to swat a fly. This proposal and the compliance-based management strategy are drastic and overly punitive and will not work in this population setting. Indeed it will backfire and cause social unrest.

Most sadly, this proposal and process has resulted in the loss of my support for the NPS in general, souring a very positive view that I had held towards NPS for decades. Seeing the inaccuracies and downright lies in this

document and what is clearly a political agenda with data cherry-picked and skewed to justify it, I can no longer support the expenditure of tax dollars for the NPS. To the extent it becomes a campaign issue in any campaign, it will translate into how I vote. As an environmentalist, I'm deeply saddened by this loss of trust in your agency. I fear this is a similar case to what occurred for the Point Reyes Oyster DEIS, where the National Academy of Sciences determined the NPS cherry-picked the data to support a viewpoint, defying objective scientific principles. NEPA is clear that EISs are to serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made (40 CFR 1502.2(g)). There is entirely too much "decision" and not enough objective "assessment" in this document. My specific comments follow:

Purpose and Need Not Demonstrated The DEIS identifies problems it hopes to address with the plan, but does not provide sufficient data to demonstrate why such radical changes are necessary. The fact that the current policy is inconsistent with NPS Regulations does not provide an adequate reason to make such changes, considering the unique history of these lands, which were provided by the City of San Francisco for recreational and other use. There is no discussion of how this inconsistency could be remedied using policy changes instead. The DEIS states that the Organic Act and its amendments afford the NPS latitude when making resource decisions that balance visitor recreation and resource preservation.(p. 34).

The purpose and need chapter states that user conflicts are also driving the need for action, yet this does not bear out in some of the surveys and public comments NPS has received. Of the comments received for the public comment analysis report, just 13% of them cited feelings of discomfort around or fear of off-leash dogs and felt that they were dangerous to children. A "similar percentage" (i.e. a low percentage) also stated that dogs in general make the park unsafe for visitors (p. 31). Thirteen percent (and a similarly low percentage) is not a large number. Also, the telephone survey NPS conducted of 1,600 people found that the largest proportion of visitors from each county stated that off-leash dogs had neither a positive nor a negative effect on their experience at GGNRA (p. 31). Almost one third who had seen dogs off-leash in GGNRA viewed the experience favorably. These are not numbers that indicate an extreme change in policy is necessary. The draconian restrictions are not commensurate with this small percentage of the population that has problems with dogs.

The DEIS repeatedly states that there is a problem with confusing regulations and that there are undefined and contradictory for dog activities within the park. The DEIS seems to be viewing GGNRA as one park, but the public experience of GGNRA is by park unit. There is simply no need to have uniform rules across so many distinct and diverse park units across a large geographic area. Regardless of this, the preferred alternatives and

other action alternatives surely do not solve this "problem" anyway, as they would make the rules more confusing - for example, the trail designations in Fort Funston offer no rhyme or reason as to why dogs are allowed in some areas and not others. ROLA's are located adjacent to areas of total dog ban. This kind of poor planning shows a lack of understanding of how people interact with the environment, and it will certainly increase confusion in the public.

Alternatives Arbitrary; Alternative Development Process flawed, not disclosed This section beginning on p. 45 is named the "alternative development process" however no process is identified and no rationale is presented for why the alternatives were developed the way they were. No resource protection priorities or use conflict goals were identified for the areas, which is necessary to assess the ability of the alternative to meet the goals in a manner that does not unnecessarily infringe on recreational uses without providing measurable benefit. Much more detail is needed for disclosing the alternatives development rationale and process, especially since no clear logic is apparent in the development of the alternatives - it appears very arbitrary. General themes were used to name the alternatives (e.g. multiple use, most protective, etc.) but no information is provided as to how this theme is accomplished for the particular resources and user conflicts that are occurring in that park unit. The DEIS only states that the internal NEPA team discussed strategies and management goals. It states that there was an internal site-specific analysis (p. 46) that guided the development of alternatives, but this information is not included in the document, so is not available to the public. We are told on page 46 that Chapter 2 provides an overview of how the analysis of data, expert opinion, and best professional judgment was applied to develop management alternatives, but no such overview is included. Chapter 2 simply states that the team's internal discussions resulted in the formation of alternatives presented.

What criteria are used to establish the alternatives' themes and why? The DEIS says a goal in the development of alternatives was that they were consistent with dog management policies on adjacent lands (p. 25). This does not appear to be a necessary criterion - why was it included?

The DEIS states that the GGNRA General Management Plan (GMP) - the blueprint for the next 20 years - is happening now, and the decisions from the dog management planning process will be incorporated into the GMP planning process (p. 37). This makes no sense, as a more detailed description of the resources and the future planning goals for them should influence the development of alternatives for this plan. It is precisely this information that is missing and what makes the alternatives so arbitrary. The two processes should occur concurrently, so that the dog plan can be informed by the goals of resource protection, not later incorporated as

stated. A GMP objective is to "retain opportunities for recreational activities pursued in the park today". The dog plan alternatives severely limit opportunities for dog recreation, so having the dog plan process occur separately is already undermining the GMP objective.

The DEIS states that "after evaluating each alternative against each objective for each site, it was determined that all action alternatives meet the objectives of the plan/EIS" (p. 91). This is clearly not true, as the process for determining this was flawed. This section entitled "How the Alternatives meet the objectives" goes through each alternative and eliminates Beater flexibility for dog walking en masse, i.e. - when a reason was true for one site - it was arbitrarily applied to all sites as a reason to dismiss Alternative A or other reasonable alternatives, from evaluation. The resources at each site are unique to that site - and each site should be evaluated for them. There are ways to meet the objectives and protect the specific resources at each site without such severe restrictions. This is a lazy planning approach and it is unacceptable. A site-specific assessment which discusses the resources in more detail vis-a-vis the objectives is necessary.

Also counterintuitive and irrational is the designation of sites that doesn't consider heaviness of use. Baker beach is designated as light use, and Fort Funston as heavy use, but this does not seem to have been taken into consideration in the formulation of alternatives. Heavier used sites should consider this fact and attempt to provide an access plan that would accommodate the heavier use (i.e. - less restrictions). Providing severe restrictions in heavily used areas would increase conflict, invite noncompliance, and increase health and safety concerns.

Alternatives are the most important part of the DS (they are the "heart of the EIS" according to the Council on Environmental Quality's NEPA regulations (40 CFR 1502.14). The alternatives in the DEIS are arbitrary and were not developed on a sound basis. Information on how the analysis of data, expert opinion, and best professional judgment was applied to develop the alternatives was withheld from the document, and no explanation as to how they meet specific resource management or user conflict goals for the particular site is included. They are overly simplistic and do not differentiate between resources differences at different sites or heaviness' of use, and does not appear to be informed by dog recreationalists as to practicability or safety. Even the "most dog walking access" alternative is still overly restrictive without reason or scientific basis as to why such restrictions are necessary at a given site. Such an explanation should include monitoring data and other evidence that dogs are significantly contributing to resource depletion.

The FEIS should explain, for each management unit, 1) what resources are currently being impacted that require a change from current management to

meet the purpose and need, i.e. what resources are in need of protection/restoration or what specific user conflict is driving a change in management for that unit; 2) what the goals are for that resource and particular user conflict, (3) why those goals are appropriate and how they were determined and 4) how the formulation of the alternative would accomplish those goals. Include a map identifying the locations of resources of concern for each site so that the reader can see how the proposal would accomplish the goals.

Limited Range of Alternatives; Reasonable Alternatives Not Evaluated Not only are the alternatives arbitrary, but there is a limited range of alternatives. The DEIS says the plan examines impacts from a full range of alternatives (p. 11) but this is not true. Many reasonable alternatives were not considered, or they dismissed without sufficient basis.

Mitigated "No Action" Alternative - The DEIS says that the No Action Alternative "A" does not meet the purpose and need (p. 94), but the DEIS does not offer a mitigated No Action alternative that would address the main concerns of the NPS regarding the current condition at the particular sites. It is possible that the real problems that exist could be addressed without making radical changes that only would create new problems. There needs to be a mitigated Alternative A, perhaps an Alternative AI which would represent the existing pet policy plus specific mitigation measures designed to protect the specific resources under threat in specific locations, with those mitigations clearly described and discussed as to their expected effectiveness to address the problems at those locations, unlike the generic approach taken in the DEIS that simply speculates that dogs could be contributing to certain resource issues, without evidence showing dogs are even responsible for contributing to them.

An alternative that evaluates leashed dogs at Ocean Beach. The FEIS should evaluate alternatives in the FEIS that allow leashed dogs at Ocean Beach as no legitimate reason is provided why this alternative is unreasonable. See more below under Ocean Beach comment.

Time and/or seasonal restrictions - The DEIS states that these were considered but dismissed because they create confusion among the public and lead to noncompliance. This is laughable and insulting. Bay Area residents are some of the most educated people in the country and can determine the rules if property posted. Consider these existing rules for Golden Gate Park users of Speckles Pond for model boats. The signs posted at the lake have these instructions (see also from <http://www.sfrnyc.org/website/index.php>):

- Park regulations limit the times for nitro and gasoline fueled Internal Combustion powerboats to Tuesday, Thursday and Saturday mornings, from

10:00 am to 1:00 pm.

- Park regulations also restrict gas-powered boats to operation at the southern section of the lake nearest John F. Kennedy Drive and with a strict noise level ordinance.

- Sailboats commonly run in the afternoons, from 1:00 pm to 4:00 pm every day.

The DEIS does not provide adequate reason why time restrictions are not a reasonable approach to address visitor conflict or to lessen restrictions on dog recreationalists (p. 92). Time restrictions alternatives should have been developed and evaluated. This approach has been used successfully in many areas, and addresses a very large need for dog recreationalists, who generally have recreational needs in the morning and evening hours. They were dismissed because the DEIS says this will add to confusion, but this is not an accurate conclusion. Certainly it is no more confusing that the ROLA delineation area at Fort Funston, which would prohibit dogs on the sunset trail directly adjacent to the ROLA - now that's confusing! The DEIS even states that in their survey of other NPS units - 11 incorporate seasonal restrictions for on-leash dog walking on beaches (p. 25), so clearly these other populations can handle this "confusion". I'm quite sure we can also. The FEIS should develop alternatives(s) that allow additional off-leash/voice control access to areas during certain time periods of the day to reduce impacts to recreationalists.

An alternative that provides more ROLAs was dismissed (p. 92) because it says that it would not meet the purpose which is to preserve and protect natural resources; however no attempt to meet the objectives through additional mitigation measures is considered or discussed. This approach is reasonable and should be included. Fencing is mentioned on page 92 and discussed as if it is not possible because of aesthetics, but stick windrows have been used in parts of Fort Funston and they are aesthetically pleasing. They could be fortified if necessary, and they would not impose negative aesthetic qualities and could also provide cover for small birds. NOT providing more ROLAs would not meet the purpose of the EIS which is to build community support for the plan. An alternative with more ROLAs and specific mitigation measures to preserve and protect natural resources should be evaluated in the FEIS.

Voice and Sight tag program -The DEIS discusses the City of Boulder's Voice and Sight tag program. While it doesn't indicate the success of this program, NPS was aware of this approach and should have considered it during the development of alternatives. The alternatives discussion in the FEIS should explore this as an alternative or explain why is not being

considered.

Preferred Alternative does not meet project Objectives listed on page 2. The preferred alternative clearly does not meet the objectives listed in the DEIS on page 2. One objective is "to minimize conflicts related to dog use", but the preferred alternative would increase conflicts in areas where dogs are allowed. It is well known that dogs that are well exercised have fewer behavioral problems. The severe restrictions on off-leash areas could lead to increased behavior problems. Also, more leashed dogs could increase conflict for some dogs that have leash aggression - a behavior that only occurs when on-leash. It will also increase dog-on-dog conflict as a result of dogs being squeezed into much smaller areas, which would in turn increase impacts to owner health and safety.

The preferred alternative does not meet the project objective of "building community support for the plan to maximize management of dog walking use". The population in which it is most important to build support is the community of dog owners and those with animal companions. There is a strong lack of support among organized dog groups and unaffiliated individuals that I speak with when out and about. This alternative is a disaster and will increase animosity from dog recreationalists. This strong lack of support would not contribute to meeting another project objective of ensuring "a safe and healthy working environment for park staff", Park staff, being the most visible representatives of the NPS, will surely experience the frustrations and animosity of this ill-conceived plan indeed the DEIS states that when GGNRA began citing for noncompliance in the past, "conflicts between dog walkers and park staff increased significantly" (p. 6). Additionally, the compliance-based management strategy is overly punitive, and research studies show that an overly punitive approach causes people to rebel and become defiant. This will not create a safe and healthy working environment for staff. There is already significant anger regarding this plan, which stems from its lack of fairness and reasonableness. It also threatens the ability to adequately care for our animal companions, which for many of us is the strongest bond of love we have. It is more than recreation, and the NPS should understand the primal nature of this bond, comparable to that of mother and child, and how a threat to it might translate into noncompliance, conflict with park rangers, potential for vandalism and other outward expressions of disapproval. The preferred alternative will not ensure "a safe and healthy working environment for park staff", a project objective, and therefore should be dismissed.

Specific Locations: Fort Fronton There is no rhyme or reason for alternative development for Fort Funston. Areas that are accessible literally have use walking in the bushes. Why is the chipped trail designated on-leash and the sunset trail, which borders the ROLA, prohibit dogs entirely? This makes no sense. All ROLA's should be bordered with leashed areas at least (unless

they are fenced, which would be inappropriate for GGNRA and visually offensive), so that the change in rules for the location are gradual. Also, who decided that the water fountain areas would be on-leash? A bunch of dogs with leashes attached would not be able to drink at the same time at the fountains without getting tangled up and presenting a health and safety risk to both dogs and owners. Again, it's obvious that no one that actually walks dogs developed these alternatives.

The two access paths to the beach and ROLA for Fort Funston are designated on leash. Both trails are very steep, one has the sand ladder because it is so steep. Attempting to walk a leashed dog down such steep trails is a serious safety concern. I can barely keep my footing just walking down by myself, but a dog on a leash would pull me off-balance and cause injury. Walking more than one dog on leash would be almost impossible. Both trails down to the beach must be designated off-leash for safety reasons. Again, it's obvious that no one that actually walks dogs at Fort Funston developed these alternatives.

What evidence is there that dogs are damaging Battery Davis? The DEIS implies that dogs are damaging this resource, but this is a laughable assertion with no basis. People are damaging Battery Davis, and the NPS is damaging it by not maintaining it. Graffiti is routinely sprawled across the concrete walls and the concrete is crumbling from the fog and moist conditions and lack of maintenance from NPS. Blaming the dogs for this is ludicrous. The FEIS must provide distinct evidence that dogs are even remotely contributing to any impacts to this resource to justify banning dogs entirely from the trail to the west of it, and leashing dogs on the trail to the east.

Ocean Beach Complete dog ban unnecessarily restrictive. The complete banning of dogs on the vast stretch Ocean Beach (except for the ROLA to the far north) is an extreme hardship for those of us that live nearby, and the DEIS simply does not provide sufficient basis that this ban would benefit the snowy plover in any substantial way. The studies cited simply state that some birds are disturbed by people and dogs. Only a very small subset of dogs will even chase birds, and they tend chase the larger ones, like the ubiquitous ravens or gulls by the surf. Unless a dog is walking by the dunes, they would not even see the plovers. Most dog recreationalists, myself included, walk down by the surf.

The ocean beach alternatives are unnecessarily restrictive and no reason is provided as to why. For example, there is no alternative, except the No Action alternative, that proposes access for leashed dogs. Leashed dogs can't chase anything, and this policy would at least allow me to walk to the beach and watch the sunset with my dog (I would have to drive to the ROLA). There is also no reason why the alternatives don't allow for the existing off-

leash/voice control:period of May 15-June 30th when the plovers are not present - which is currently allowed under the emergency regulation.

The DEIS only states that it will simplify enforcement to have a complete ban, but this is hardly a reason to deprive us of enjoyment of the beach with our dogs. As mentioned, and even identified in the EIS, seasonal or time restrictions are not only policy in other NPS units but are being used in other communities. Each alternative for Ocean Beach should allow for this existing off-leash/voice control period of May 15-June 30th. There should be additional alternatives that evaluate leashed dogs at Ocean Beach. No alternatives evaluate this, and this is a substantial oversight as no legitimate reason is provided why these alternatives are unreasonable. The FEIS should evaluate alternatives in the FEIS that allow leashed dogs at Ocean Beach and the off-leash/voice control period of May 15-June 30th should be added to all alternatives.

There is also no reason, from a water quality perspective, to ban all dogs from most of Ocean Beach. Currently dogs are allowed on leash, and off-leash/voice control for 1.5 months). The environmental group "Heal the Bay" just released their top 10 cleanest and dirtiest beaches for water quality. Ocean Beach received a perfect score, both at Balboa Avenue and Sloat Boulevard, and was named to the group's honor roll.

Compliance-based management strategy Alternatives are crafted to almost make compliance impossible (see comments regarding Fort Funston). Yet the compliance based management strategy could result in all dogs being banned from all GGNRA lands except for the few ROLAs if at least 75% compliance is not demonstrated, and this change would be permanent, even if monitoring results show compliance goal was later reached. There is no reason provided as to why this strategy was formulated this way, and it leaves us to conclude that it is really the motive of this plan - to create alternatives so restrictive that compliance is almost impossible, and then to punish us when we don't comply. This policy and plan sets us up to fail - there can be no other interpretation. This is clearly a premeditated strategy, and it is outrageous and a reprehensible way to treat tax-paying citizens.

This policy would also work against meeting the project objective of ensuring "a safe and healthy working environment for park staff". This policy is so overly punitive, that it will surely backfire. Research studies show that overly punitive approaches to noncompliance cause people to rebel and become defiant.

Adaptive management should occur from resource health monitoring, not compliance monitoring. The compliance strategy should directly relate to resource health indicators, because compliance monitoring does not necessarily translate to resource health. Indeed the DEIS gives such sparse

reasoning showing any strong connection between dogs and resource impacts that one can hardly make the stretch to conclude that compliance equals resource health, especially for snowy plover impacts and water quality impacts. Such monitoring efforts will be a waste of tax-payers dollars and will cause unnecessary conflict between users and park staff without the benefit to resource health. This policy is a recipe for disaster. I urge you to remove this policy from the FEIS.

Impact Assessment The impact assessment is poor in design and not based on science. Throughout the document, the impacts are attributed to dogs simply because they are possible. No substantial evidence is provided to demonstrate that the impact is either occurring or occurring in a way that is impacting resources to an extent that justifies action. Two of more egregious examples of this are the impacts to shorebirds, including the snowy plover, and impacts to water quality. In addition, the impact assessment does not consider the heaviness of use at the different sites. Baker beach is designated as light use, and Fort Funston as heavy use. Heavier use areas will receive greater impacts from concentrating users in smaller area than lighter used sites.

Impacts to Shorebirds Dogs are being made scapegoats for impacts to resources that are occurring from a number of factors. The DEIS provides no studies or makes any attempt to quantify or estimate the relative proportion of harassment or mortality attributable to dogs versus various predators at the specific sites. Local bird counts show significant increases in common ravens in SF. This article documents the population explosion as far back as 2002. I have seen a significant increase in ravens at Ocean Beach and Fort Funston. Hang gliders I have spoken with have also noticed this increase. It is very likely that ravens are the real threat to the snowy plover. Ravens predate on plover eggs and NPS's channel islands websites acknowledges the impact they are likely having on the plover there. I have seen Ravens bothering other birds, as they are very gregarious. (I have also seen Ravens bothering my dog!) There needs to be an estimate of the likely contribution of each throat to the snowy plover at each site so that the impacts from dogs is put into perspective. Based on my experience, I find it highly unlikely that dogs are contributing even 5% of the impact at Ocean Beach. You would have a better argument if plovers nested there, but they simply overwinter there, and no clear connection is made - only speculative statements .

I have substantial concerns that the data used to try to justify restricting dogs from beaches due to the snowy plover was cherry-picked and was not objectively collected. I am aware that some studies that were used were conducted by the Audubon Society, a bird advocacy group. These studies clearly are not objective and should not be used in this DEIS. Would you allow advocates of dog recreation to conduct such studies and expect them

to be objective? Additionally, I understand that results from a 2007 study by Meg Warren of U.C. Berkeley that concluded that the plovers are not negatively impacted by dog recreationalists was omitted from the DEIS because the NPS did not agree with the conclusion. This is a clear repeat of the mistakes NPS make in the oyster farm studies. There, the National Academy of Sciences found park service officials exaggerated that operation's negative impact on the environment, and that is clearly what you are doing here. To quote Diane Feinstein on that case, "It is critical to the integrity of the National Park Service and the Department of the Interior that you publicly disavow the practice of selectively misusing and misconstruing science to achieve a desired outcome." NPS must apply that advice 1.0, this Dog Management Plan process.

The DEIS does cite some studies that indicate that dogs do not generally harass wildlife, including birds, but these studies are included in the safety section (p. 30). Here it states that a case study in Boulder Colorado concluded that dogs off-leash "were rarely observed chasing other dogs, disturbing people, chasing wildlife, destroying vegetation, or entering bodies of water." This section also references a study on leash laws and habitat type on avian and small mammal communities in urban parks (Forrest and St. Clair 2006) that concluded that off-leash dogs have no effect on the diversity or abundance of small mammals or birds in urban parks. (p. 30). These studies should be discussed in the impacts to wildlife section, not the safety of off-leash dogs section. These conclusions lend support to the conclusions that dogs are not a real environmental threat for wildlife. The DEIS states that dogs causing actual direct injury to or mortality of wildlife is rare (p. 29).

One of the wildlife studies cited states that "when shorebirds are flushed, it is not solely because of the dogs presence; it has been suggested that dogs extend the zone of human influence when off-leash" (p. 28). If this is the case, then focusing on dogs makes no sense. If the NPS will use this study at all to support conclusions of impact from dogs, it must conduct additional studies that evaluate the extent humans alone are flushing shorebirds, and estimate the frequency and extent that dogs are contributing. Otherwise, this study does not support the severe restrictions in the preferred alternative and other alternatives. If it is determined that humans alone cause statistically similar disturbance, then the NPS needs to evaluate its shorebird protection strategy and alter it to not focus solely on dogs but provide an integrated strategy.

The FWS is designated critical habitat for the snowy plover all over the west coast of California. No SF sites were included in this proposal. The designation of critical habitat to such a large extent will offer additional protections and this cumulatively beneficial effect should be documented in the FEIS and taken into consideration when assessing cumulative impacts

from dogs from the No Action, and other alternatives.

One of the more outrageous assertions in the DEIS is that dogs could disturb bank swallows on the cliff face at Fort Funston. I have seen the swallows come and going from these burrows and since they are on a sheer vertical cliff face, there is no way a dog can get near them, and certainly no way they could disturb them. I have seen stupid people trying to climb them, putting their feet in the burrows. Dogs are harmless to bank swallows and any assertions to the contrary are ludicrous.

Water Quality Impacts from Dog Waste The DEIS does not provide data that demonstrates that dog waste is a significant contributor to water quality impairment. A number of bacterial tracing studies indicate that pet waste is a relatively minor contributor to bacterial pollution in waterways, even where these run close to well-used pet exercise trails. The DEIS references a study of a beach in Long Beach CA that showed no water quality differences in areas with dogs versus those without. Clearly, site-specific studies need to be conducted for the GGNRA beach and other sites for which substantial restrictions are proposed if water quality reasons are to be used to justify such severe restrictions on dog recreationalists. There is no evidence that dogs are contributing to any water quality impairments in the GGNRA in any substantial way. In fact, the environmental group "Heal the Bay" just released their top 10 cleanest and dirtiest beaches for water quality. Ocean Beach received a perfect score, both at Balboa Avenue and Sloat Boulevard, and was named to the group's honor roll. See

Impacts on adjacent parks/transferred impacts The assessment of indirect impacts on adjacent parks is nonexistent. Simply identifying nearby fenced in dog parks is not an impact assessment. For many sections, it states there would be no increase in use of nearby parks, which has no basis. The opposite is true, as was evidenced during the closure of Fort Funston during the Japan Tsunami, where over 200 dogs were present at nearby Stern Grove. Our City-owned parks would experience increases in user conflicts from more crowding in them. The City Recreation and Park Department would be stretched when it is already experiencing budget problems. City law enforcement would have to handle conflict caused by the GGNRA. A detailed impact assessment on all resources must occur for all City-owned parks, especially Golden Gate Park and Stern Grove. Conclusions should be made regarding "possible conflicts between the proposed action and the objectives of ...local land use plans, policies and controls" for these areas receiving transferred impacts, as required under 40 CFR 150216(c).

Impacts on Health and Safety There is insufficient data to show cause for any health and safety concerns due to the presence of dogs in the GGNRA. Just 2% of serious safety incidents involved dogs, and including non-serious incidents, dogs accounted for a mere 7% of incidents. The issue of safety

cannot be used to justify such a drastic change in policy.

There is a serious safety concern with the preferred alternative's proposal to require leashes on the two steep beach access trails. It is hard to get one's footing with a dog pulling you - injury and falls will occur if this policy is implemented. These areas must be changed to off-leash for safety purposes or NPS will be responsible for injuries.

The safety issue identified on p. 20 of wildlife transmitting disease to dogs is a stretch. The potential is remote, and certainly not sufficient cause for such drastic policy change. Also, dog recreationalists assume a certain amount of safety risk being out in nature. You might as well say there is a safety risk in driving to the site - its sure to be higher than these risks.

The DEIS cites health concerns from dog waste (p. 20). Is there any evidence that this has ever occurred? The mere potential for something to occur is not enough to warrant such severe restrictions, there should be some evidence that it has occurred in GGNRA or similar environments. The FEIS should make an attempt to characterize the problem as it pertains to the project sites.

The DEIS uses the fact that dogs and people have to sometimes be rescued as a reason to limit dogs, saying the rescue attempts can cause injuries to park law enforcement (p. 19). It does not discuss an option for allowing a volunteer rescue team to be formed that could be called first, to relieve law enforcement from this obligation. This should be discussed and explored as mitigation in the FEIS. Now that I know that it's such a burden on law enforcement, I will avoid calling them for any assistance I might need when on GGNRA lands. Socioeconomic impacts on small business entrepreneurs not assessed Socioeconomics was dismissed from further analysis however the discussion provided on p. 23 justifying this only looks at more macro-scale impacts on the larger economy and does not evaluate the impacts on the small business community of commercial dog walkers. As a dog owner who must work and be away from home for 11 hours a day; the service that this sector of small businesses provides is invaluable to me and to many others. These commercial dog walkers are business entrepreneurs, many bonded, licensed and with insurance. While they are professionals, they must work hard in order to make a full-time living, and of course have to buy their own health insurance and fund other benefits. The financial impact on this business sector was not assessed, despite the fact that the plan specifically addresses this sector and proposes significant changes to the rules affecting it. Clearly the restrictions on this sector could result in reduced potential to earn income. These effects are significant considering the high cost of living in the Bay Area and the difficult economic climate in general. The FEIS should assess socioeconomic impacts to this small business sector. It should consider environmental impacts that could result

from entrepreneurs forcing to increase trips to comply with the 6 dog limit, and the likelihood that businesses might not be able to sustain themselves and be forced to close. To the extent that these entrepreneurs are low-income, these could be ET impacts. Low income determination must consider that this is a high cost of living area. Mitigation measures to mitigate impacts to these small business entrepreneurs should be discussed and adopted in the FEIS.

Socio-cultural effects not assessed Socio-cultural effects were not assessed in the DEIS and since this plan will so profoundly affect people's lives, this is a serious omission that must be corrected. Dog recreationalists have a distinct community and relationships, as well as individual life practices that may center around their relationship with their dog. The preferred alternative would have serious impacts on a major cultural component of the dog community. The individual's relationship with their dog may also provide substantial meaning to their lives.

The FEIS does not identify the evolution that has occurred regarding the human-dog relationship and without this information, any hope of understanding the nature of impacts on human communities and visitor experience is incomplete. This discussion should focus on the evolution of the human-dog relationship in the U.S. and the importance that humans place on the welfare of their dogs. The advanced place of dogs in society can be seen in the preponderance of current books on the subject. Not just dog training books but books on the significant shared experiences and on understanding dog's experiences (for example, "Inside of a Dog: What Dogs See, Smell, and Know", by Alexandra Horowitz is now and has been 8th on the Bay Area's best seller list for 33 weeks). One can even get a B.S. in canine studies at Bergin University in Sonoma County. The analysis of impacts in the FEIS should acknowledge this culture more fully so that impacts are accurately presented. This evolved human-dog bond also has implications for the issue of conflict of dog walkers with park rangers, which is a project objective and part of the purpose and need for the project.

The importance of the human-dog relationship is demonstrated by one study that was conducted to assess the relative closeness dog owners felt towards their dogs. It asked them to represent their significant relationships pictorially using a Family Life Space Diagram. It revealed that more than 1/3 placed the dog closer to themselves than any other family member and led authors to conclude, along with other studies, that for about a 1/3 of owners, the dog's importance ranks on par with that of the human members of the family. (See: The domestic dog: its evolution, behavior, and interactions with people by James Serpeli). Another indicator of the importance dogs have in our lives is the fact that pet supply stores have not suffered the same economic impacts as other businesses in this challenged economy the last few years. This has been reported in the media on several

occasions, and supports very high value of dog or pet welfare to humans and the priority they place on their pet's welfare.

Another fact to consider is that studies have shown that attachment to pets is highest for people living alone and for couples who do not have children living at home. This factor should be considered in relation to the demographics of the population for the different GGNRA sites when making decisions regarding dog walking restrictions. This impact on the specific population should be thoroughly disclosed. If these studies are correct, then restrictions on dogs would be akin for some people to restrictions of bringing certain family members with them to the park. The decision-maker should be fully aware of this deep dog-human bond when considering the practicability of the decision and the expectation. For achieving the project objective of building community support for the plan (p. 2)

Impacts on Park Operations The DEIS states that managing current dog walking policies in the park requires significant staff time for GGNRA law enforcement, maintenance of heavily used dog walking areas, and responding to visitor concerns/complaints (p. 17), yet the chapter on impacts to park operations shows that the No Action alternative has the least impacts on park operations over the other alternatives. The other alternatives would introduce a police state into our parks, and turn simple law abiding people into criminals simply because they want to be with their full family in outings on our public lands.

Impacts to Visitor Use/Experience The statement on page 18 that "Dog walkers and visitors without dogs often come into conflict" is outrageous and further proves that the people who wrote this DEIS have little to no experience using these areas with dogs. This statement is so counter to my experience that it is laughable - I use GGNRA areas often and incidents of conflict are rare. In fact, the exact opposite is true - there is much joy and happiness shared between me and my dog, and others without them, especially tourists, who often say they miss their dog at home and come to pet mine. I've had people without dogs take pictures of my dog playing on the beach, and play with him when he interacts with them. The FEIS must provide a basis and evidence for such an outrageous statement. "Often come into conflict" is simply not accurate.

In general, the methodology of analyzing visitor experience is flawed. It does not take into account the quality of experience in assessing impacts to dog recreationalists. It's more than just whether "prefer" to walk our dogs, but being able to enjoy NPS lands at all. Dogs are our family members and such wide-scale exclusions is akin to saying people shouldn't bring their children when they go out to the park. Fenced-in dog parks in other locations do not provide me adequate exercise, and severely restrict my experience of nature.

They are not equivalent experiences, and the DEIS presents them as if they were. This needs to be remedied in the FEIS.

The impact assessment to visitor experience must be expanded so that it is made more meaningful. NEPA requires that NPS "identify and develop methods and procedures which will insure that presently unquantified environmental amenities and values may be given appropriate consideration in decision-making along with economic and technical considerations" (42 USC ' 4332 (2) (B)). NPS must discuss the unquantified values. The action alternatives will cause significant impacts to my connection with nature and my environment. I would lose the joy of seeing my dog's natural behavior. I would lose the sense of freedom from walking alongside him as a friend. I would lose the access to nature, being forced into more crowded ROLAs that does not offer a nature experience. I would feel heartbreak at seeing the ROLA become completely degraded as a result of squeezing a large number of dogs into it, as opposed to the dispersed negligible to minor impacts that previously occurred. I would experience stress from having to witness increased dog-on-dog conflict in these compressed areas and possibly from more leashed dogs, due to leash aggression. I would experience extreme hardship from the loss of spiritual renewal from being unable to watch the sunset with my dog on my beach at Ocean Beach. I would experience extreme sadness at the loss of trust in my government, and anxiety in watching my peaceful open spaces turn into a police states, teeming with law enforcement officers.

Air Quality No air quality analysis is included in the DEIS but the significant changes that would result from this plan would cause changes in when and how often people use their cars and how far people drive. The DEIS dismissed from analysis the requirement to evaluate energy consumption, stating that vehicle miles traveled because of dog walking are negligible in the context of regional travel. It is not clear if the DEIS is also translating this conclusion to the analysis of air impacts. The DEIS acknowledges that the alternatives could affect visitation patterns (p. 23). For me it will cause me to drive every morning to walk my dog on the beach where I could previously walk. If I am unable to walk my dog on Ocean Beach, I will have to get into my car and drive to the LOLA to the north unless I have an abundance of time, which is not the case when walking my dog in the morning before work. This will result in 10 additional car trips per week - albeit short ones. But while the trips would be short, the majority of vehicle emissions occur during engine warm-up and represent new emissions under the action alternatives that would not be in the air under the existing conditions. And this is just for me - one person. The hundreds of people affected by this plan necessitate this analysis in the EIS. Some of the restrictions are so severe that it will force people to drive much further to obtain an comparable nature experience. Sites that are more remote that will prohibit dogs entirely, such as Muir beach, will result in even longer vehicle

trips. A discussion of potential air quality impacts from the alternatives should be included. Additionally, the DEIS states that law enforcement will be increased, so the increased emissions from law enforcement vehicles should be estimated and added. Because the local air basin is in nonattainment for air quality standards for certain air pollutants, the FEIS must state whether the general conformity regulations under the Clean Air Act apply.

San Mateo County and New Lands There would be no off-leash areas at all in San Mateo County, and this is especially harsh. San Mateo County has few locations where dogs are allowed, being prohibited from all San Mateo County parks, which would make this impact to recreational resources not only individually significant but cumulatively significant. There should be some ROLA's in San Mateo County. The impact assessment must take a hard look at impacts that would be transferred to other sites.

The DEIS mandates that there will be no dogs, either on- or off-leash on any lands that get added to the GGNRA in the future. even if dog walking has taken place on those lands for decades. Instead, provisions should be in place to grandfather in existing dog access and to offer a public process and comment opportunity for those locations. No impact assessment would have been done on these new lands and such severe restrictions may not be necessary for the protection of resources.

EIS organization The DEIS was poorly organized and made review very difficult. The FEIS should be reformatted so that the information for specific geographic units are all together in one section and not spread out throughout the resource chapters, without even tabs to help locate them. Reviewers will be interested in certain locations over others and organizing the EIS this way will help the public tremendously. The FEIS should discuss each location in a separate section and within that section, have the impacts to the different resources discussed.

Thank you for the opportunity to comment. I hope these comments are taken seriously, remembering that your actions on this plan will affect the reputation of the NPS and its ability to make science-based decisions, not political ones. Any questions can be directed to. Karen Vitulano San Francisco, CA 94122

cc: Congresswoman Jackie Speier Senator Diane Feinstein Senator Barbara Boxer Secretary Ken Salazar, Department of the Interior Jon Jarvis, Director, National Park Service California Assemblymember Fiona Ma Carmen Chu, San Francisco District 4 Supervisor

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Overview

According to Wikipedia, Environmental Justice is:

Environmental justice (EJ) is "the fair treatment and meaningful involvement of all people regardless of race, color, sex, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies."⁴¹ In the words of Bunyan Bryant, "Environmental justice is served when people can realize their highest potential."¹³¹

Environmental justice emerged as a concept in the United States in the early 1980s; its proponents generally view the environment as encompassing "where we live, work, and play"

I have a master's degree, over 15 years of experience as an auditor, and was formerly with a major public accounting firm. This 2200-page environmental impact study and plan is the most overwhelming and misleading document I've ever seen and it makes it nearly impossible for the public to provide meaningful comment. In addition, the Park Service is impeding the public comment process by providing misleading statements to the media and the public and by withholding or delaying providing information needed to meaningfully comment on the DEIS. I strongly agree with the more extreme conservationists, "we need to look at evidence" but disagree that suppressive and misrepresented Park Service regulations are a primary justification; therefore I believe public comment is vital to protect the public interests. For over 40 years, dogs have been integral and active part of healthy and safe recreation for a diverse group of people on the GGNRA lands so any changes need to be based on facts and not unsubstantiated "hypotheticals".

My specific concerns regarding environmental injustice include: ? Freedom of Information Act and Unlawful Abuse of Power ? Unsubstantiated Claims are Detrimental to People ? Freedom of Speech Impediments ? Overwhelming and Misleading DEIS and Information Provided to the Public ? Minority Misrepresentations & Non Representation ? Discrimination Against People with Dogs

Freedom of Information Act and Unlawful Abuse of Power

I've been shocked at what feels like deliberate delays in providing real data to citizens. Almost immediately when I became aware of the claims regarding dog incidents, I submitted a Freedom of Information Act request, and the Park Service quickly responded. Then delays started when it was clear that, while a concerned environmentalist and citizen, I was pro-dog. It took two months, a

department of interior appeal, and the threat to go to court before the Park Service provided a simple download from an Access database with the GGNRA Law Enforcement Data. See Appendix 2: Mar30, 2011 Department of Interior Responses to FOIA Appeals & Support.

The Park Service has done the same with my other requests for real GGNRA information on the "hypothetical" adverse impacts and only provided some information after long delays and the rest is still outstanding even though today is the last day to provide public comments. I submitted a second appeal to the Department of Interior on April 25, 2011, and the Park Service was instructed to respond by yesterday but I still have not received a response. See Appendix 1: May 17, 2011 Department of Interior Responses to FOIA Appeals & Support.

Suzanne Valente has had the same issues and never been able to obtain the supporting information for the environmental impacts used to justify the current leash regulations on Ocean Beach for the SPPA. She made the FOIA request for the raw data utilized in the 2006-2007 Daphne Hatch study and the Park Service would not release the data. The raw data for the latest 2009 study by Lynes, and Zlautnich is not a part of the DEIS either

In another case, she was trying to make the fundamental point that the decision to proceed with this DEIS itself is unlawful. The enabling legislation requires the GGNRA to utilize sound principles of land use planning and management. Accepted practice would be illustrated by the Rattlesnake National Recreation Area and Wilderness (RNRAW) which produces an annual monitoring report. The report assesses current recreation trends, needs, and impacts, and thereby serves as a tool for long-term management of the RNRAW. The following is taken from the Introduction of the Report for 2009:

"This is the seventeenth annual monitoring report for the Limits of Acceptable Change (LAC) based Management Direction for the Rattlesnake National Recreation Area (NRA) and Wilderness (RNRAW), which was approved in December 1992. Monitoring is the final step in the LAC planning system. It is an ongoing, continuous process and is instrumental for evaluating management effectiveness and sustainability of resource values and conditions.

The LAC process recognizes that wilderness conditions change. Wilderness areas are dynamic systems with many forces continually affecting the landscape. These forces of change include people and their impacts, fire, insects and disease, invasive species and many others. It defines what conditions are desirable and how to achieve or maintain those conditions. Based on citizen involvement, laws and regulation, it identifies what changes are acceptable rather than attempting to prevent change.

Monitoring is based upon the indicators and standards outlined in the LAC direction. The indicators and their specific standards provide methods of

measurement to effectively monitor factors and area wide issues. Refer to the December, 1992 Limits of Acceptable Change Based Management Direction for the RNRW for a more complete discussion of the LAC process.

The factors monitored during the 2009 field season include: education, use and users, trails and roads, Wilderness characteristics, vegetation, vandalism, wildlife, fire, goals and policies. Refer to Table 1 for a complete description of the factors, indicators and standards for each opportunity class (OC)."

In contrast, in 2006 when this DEIS was announced on the Federal Register, she made a Freedom of Information Act Request to provide the data, documents, and/or Staff Report which substantiated the GGNRA's claim that there was controversy over the dog policy, compromised visitor and employee safety and resource degradation which warranted this DEIS. The GGNRA's response merely stated: "The Staff Report and other documents you seek do not exist at this time". An appeal to the Department of the Interior regarding this FOIA request elicited the following response after several letters: "Since the Department has not made a determination on your appeal within the time limits set in the FOIA, you may seek judicial review under 5 U.S.C. 552(a)(4)(B). However, we hope that you will delay filing the lawsuit so that the Department can thoroughly review the issues in your appeal and make a determination. We appreciate your patience to this point and the Department will make every effort to reach a decision on your appeal as soon as possible." This letter is dated August 8, 2006. There has been no written response as of yet.

The lack of data or any documentation to support the assertions used as justification to proceed with this Environmental Review violates Federal Law as it renders this agency action arbitrary, capricious and an abuse of discretion. Accordingly, this agency action, findings and conclusions should be set aside as prescribed by the Administrative Procedure Act, 5 U.S.C. 706 (2)A.

Unsubstantiated Claims are Detrimental to People

Why is it significant that other Recreation Areas perform annual monitoring of resources and the GGNRA does not? Why is monitoring so important? As stated in an NPS publication, "Monitoring the Condition of Natural Resources in US National Parks"

(http://science.nature.nps.gov/im/monitor/docs/Monitoring_Park_Condition.pdf) the purpose of monitoring is as follows: The overall purpose of natural resource monitoring in parks is to develop scientifically sound information on the current status and long term trends in the composition, structure, and function of park ecosystems, and to determine how well current management practices are sustaining those ecosystems. Use of monitoring information will increase confidence in manager's decisions and improve their ability to manage park resources, and will allow managers to confront and mitigate threats to the park

and operate more effectively in legal and political arenas.

Additionally, a review of NPS online resources reveals that there is an entire infrastructure set up to guide and facilitate NPS properties in their monitoring duties, "Vital Signs Monitoring" (<http://science.nature.nps.gov/im/monitor/index.cfm>)

A subsection of the aforementioned web site (Program Goals) discusses the goals of park monitoring: "Natural resource monitoring provides site-specific information needed to understand and identify change in complex, variable, and imperfectly understood natural systems and to determine whether observed changes are within natural levels of variability or may be indicators of unwanted human influences. Thus, monitoring provides a basis for understanding and identifying meaningful change in natural systems characterized by complexity, variability, and surprises. Monitoring data help to define the normal limits of natural variation in park resources and provide a basis for understanding observed changes; monitoring results may also be used to determine what constitutes impairment and to identify the need to initiate or change management practices."

More recently, the National Parks Omnibus Management Act of 1998 established the framework for fully integrating natural resource monitoring and other science activities into the management processes of the National Park System. The Act charges the Secretary of the Interior to "continually improve the ability of the National Park Service to provide state-of-the-art management, protection, and interpretation of and research on the resources of the National Park System", and to "assure the full and proper utilization of the results of scientific studies for park management decisions." Section 5934 of the Act requires the Secretary of the Interior to develop a program of "inventory and monitoring of National Park System resources to establish baseline information and to provide information on the long-term trends in the condition of National Park System resources."

Clearly, the failure of GGNRA management to conduct any consistent monitoring of the resources of the GGNRA is a violation of Federal law. The more fundamental problem is that this DEIS highlights the fact that GGNRA management is in persistent violation of the enabling legislation for this park property. GGNRA management can provide no monitoring report to substantiate visitor use patterns or conflicts, no documentation of degradation of the Recreation Area resources, as well as no documentation as to whether resource degradation is inevitable or under the control of management prior to proposing these management changes. Consequently, there have been no mitigations to address problems as they arise. In truth, were the GGNRA's claims of degradation of resources even valid (I contend they are not), a case could be made that any degradation of the GGNRA property is due to GGNRA management's failure to adhere to accepted practice regarding land use planning and management. How is it equitable for the GGNRA to abolish recreational

access as a remedy to a problem they cannot document and when they have demonstrably violated the principles of sound land use planning and management?

Freedom of Speech Impediments

The Park Service curtailed Freedom of Speech by not having an open forum during the open houses. I also heard that the rangers were stopping people from distributing flyers because of the following published GGNRA regulations that infringes on the First Amendment rights to Freedom of Speech:

36 CFR-1.6 Activities that Require a Permit 2.51(a) Public assemblies, meetings, gathering, demonstration, parades, and other public expressions of views 2.52) Sale or distribution of printer matter that is not solely for commercial advertising

The GGNRA still maintains these policies even though the D.C. Circuit Court of Appeals has ruled that the National Parks Service's requirement for a permit to conduct any type of expressive activities within the 391 national parks is "overbroad and therefore unconstitutional on its face." (Boardley v U.S. Department of the Interior, C.A.D.C. No. 09-5176, 8/6/10, p. 2) See: http://www.Park_Service.gov/goga/parkmgmt/loader.cfm?csModule=security/gfile&PageID.397206

Publishing a regulation that calls for requiring a permit even for a generic "other expressions of views" is totally against American values.

Overwhelming and Misleading DEIS and Information Provided to the Public

In addition to unnecessarily overwhelming the public with a confusing and misleading 2200-page document printed only in English in a highly ethnically diverse city, other examples of the Park Service impeding the public comment process include:

1. In the media and at open houses, the Park Service continues to exaggerate the "rising" safety incidents and complaints, which aren't supported by the actual data and claims increased visitation, which isn't supported by the data either.

2. Representing to the public that "off-leash" dogs are against the law in National Parks when it is actually only against National Park Service "regulations" that the Park Service has the ability to adapt. I heard one Park Service representative at the open house telling a woman that it was illegal to have dogs off-leash and that is also implied in the DEIS, even though the courts have upheld the validity and legality of the 1979 Pet Policy. In addition, the DEIS preferred alternative clearly allows some off-leash dogs so clearly off-leash dogs can be supported by the Park Service if it so chooses.

3. Clearly the mandate for the GGNRA is "recreation" but the Park Service is attempting to turn the GGNRA into primarily a conservation area without a change in park mandate. In the DEIS the GGNRA uses the purpose statement from the 2008 "draft" foundation statement that does not appear to have been approved and complete the required process; the GGNRA was not created to bring a National Park caliber experience but per the enabling legislation was "in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning". In the 2002 survey they also modified the park purpose statement to minimize the recreational mandate.

Ignoring Public Comment

As an example of the Park Services dismissive attitude toward local residents, in the DEIS on Page 267 they states "In many parts of the Bay Area, GGNRA lands are the backyards of the citizens, and residents have come to expect public lands to be made available for dog walking and other recreational activities". This clearly is not honoring the legislative mandate of the GGNRA which is "in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning". People are not being unreasonable to expect the Park Service to maintain the recreational value of the GGNRA and for the Park Service to not arbitrarily undermine that recreational value.

In regards to dog management, the Park Service is not protecting the interests of regular citizens and needs to stop ignoring the overwhelming and on-going public comments from people with dogs and those opposed to the extreme cuts in dog recreation and degradation of recreational value. Over the past 10 years, the Park Service has summarily dismissed the overwhelming input from the diverse group of Bay Area people, particularly in urban San Francisco, with dogs regarding their need for recreational open space. Seventy-one percent of the people responding to the GGNRA 2003 Advanced Notice of Proposed Rulemaking supported off-leash dog walking. In addition, in the 2002 Population Survey, 69% of respondents from all four counties opposed reducing sites that allow on-leash dog walking, and 54% of San Francisco, with the most off-leash areas and experience, support allowing off-leash dog walking at GGNRA sites. Overall, only 41% of respondents supported the statement regarding off-leash dog walking but the survey question was not easy to understand and seemed designed to support eliminating dog access.

Discrimination Against Those with Dogs

The existing San Francisco model should be the role model for other communities on how to integrate dog recreation for a healthy and vibrant community. On the whole, the GGNRA dogs are well exercised, socialized, and trained, and dog owners are responsibly managing their dogs. While some unfortunate incidents do occur, those incidents are rare and only a few are more than nuisance type incidents. Dogs inspire people to lead healthier lives and to

interact on a daily basis with the community. While some people dislike or are afraid of dogs, there are many parks that don't allow dogs or require the dogs to be on leash. There will always be people that dislike others for whatever reason; however, suppressing dog recreation, particularly off-leash, will only lead to more dogs and people not being socialized to each other and increasing the number of dogs and people with fears.

The Park Service is discriminating against people with dogs by not recognizing dog recreation as a highly demanded recreational activity for the GGNRA. The Park Service represents that the current dog management plan is unsustainable. After reviewing the DEIS, visiting all but 3 of the park units, reviewing the law enforcement data, and the Western Snowy Plover research; the only unsustainable aspect of the current GGNRA dog management plan is the self-inflicted Park Service conflict with the people with dogs over leash laws and areas closed to pets. Instead of addressing that problem, the DEIS plan will only exacerbate these problems within the GGNRA and adjacent lands.

Minority Misrepresentations & Non Representation

It really bothers me that the Park Service and environmental groups are representing these group instead of pro,actively allowing them to speak for themselves. As far as I can tell, no one has made a real attempt to get unbiased public comment from any of these groups, and the Park Service has made it nearly impossible for everyone with the overwhelming and confusing 2200 page document and misleading media presentations.

Some points to consider:

? 2200 pages overwhelms and confuse even the most educated ? no translation into any other language of the plan or any notices or any real attempt to solicit comments from these groups ? no comprehensive evaluation of the benefits or barriers related to dog recreation for disadvantaged groups nor developing programs to maximize recreational opportunities ? cherry-picking and misrepresenting data related to disadvantaged group from the 2002 population survey and 2007 SFSU study to support banning dogs

I'm biased but I see a diverse and inclusive dog community in the GGNRA joined by our mutual love for our dogs. The beauty is we can all share equally in the park no matter what our financial situation. If anything, less advantage groups need increased education about the benefits of dog exercise and socialization and to be encouraged to come out and fully take advantage of their family dog. Ella and I went once a week for about a year to the San Jose juvenile hall for El to play with the inmates - some incarcerated for life - and many were from disadvantaged backgrounds. Those deprived kids, more than most kids, came alive when playing with all our off-leash dogs. The only reason El is a therapy dog is because of off-leash places like Fort Funston. I also think the

disabled and seniors benefit the most from off-leash recreation because of not having to juggle a leash when walking.

I've love hearing and reading everyone's personal stories and comments on the GGNRA but I came across one that tops the list and expresses my own feelings:

"I go to the beach more than I go to parks. Going to the beach is more or less the same as going to the parks for me. The ocean is also a form of nature. When I look at the ocean, I could totally relax and let my imagination run wild. I feel that life in America is truly wonderful when I watch people fishing, jogging, playing and walking their dogs. Sometimes, I would even call my parents in China to tell them that I was at the beach and they could even hear the waves! I lived near the beach in Tsingtao when I was in China, and thus, I was especially happy when I ended up living near the beach here in America." [Chinese female, 44 years old, recent immigrant, San Francisco resident)

This was in the SFSU (Roberts 2007) study <http://wildequity.org/images/4856> that the SF Bay Area Sierra Club and the DEIS (page 31) uses to justify eliminating dogs. The Sierra Club interpreted: "Asian and Latino park users report that they are less likely to visit parks for fear of harm from dogs and because of the presence of dog feces." The report actually talks about barriers and does not measure the significance in any way. It also fails to mention that the discussion groups were skewed towards recent immigrants and to those that have never used the GGNRA. If I was in a discussion group even I'd mention not liking poop on the trails but that doesn't mean I won't go because of poop. Poor transportation and communication, unfamiliarity, unfriendly park employees and visitors, fear of crime, and overly restrictive rules seemed far more of an issue than dogs. Dog barriers certainly tie in with the general discussions about fear of the outdoors and the outdoors being unclean, which positive exposure to the outdoors and dogs could help overcome. The study also talks about how attitudes change from first generation to subsequent generations.

Anyone discussing environmental injustice should look at this study and how the study is not substantial enough to draw any conclusions that dogs are a significant barrier for the general Asian or Hispanic/Latino population or for anyone that doesn't have extreme dog phobias or reactive dogs. Remember that for self-identified Hispanics in the 2002 population survey, dog ownership resulted in significantly more days spent in the GGNRA, just like others with dogs. I just hope these groups self-identify and provide strong representation about how important the GGNRA is to a diverse group of people with dogs. The Park Service should look at the demographics of people responding before drawing conclusions on the diversity of people with dogs which includes children, minorities, people with disabilities, seniors, and others.

Highlights of Relevant Personal Background ? Lived in the Bay Area for 17 years and am an avid outdoors and nature lover that has frequented many

National Parks, National Forests, and most of the parks in the Bay Area. Before Ella, a dog, joined the family, I visited National Park Service parks including Yosemite, Yellowstone/Grand Tetons, Lassen, Glacier, Grand Canyon, Redwood, Point Reyes, Pinnacles, Zion, Bryce, Death Valley, Canyonlands, Channel Islands, Denali, Dinosaur, Sequoia/Kings Canyon, Mesa Verde, Muir Woods, Natural Bridge, Padre Island, Rocky Mountain, and SF Maritime. Since Ella joined the family, we have not been to a park, other than the GGNRA, that is managed by the National Park Service because dogs are not allowed beyond the main park corridor (e.g. the campgrounds and parking lot and superficial trails). Not being able to visit the National Parks is one of the hardest things about having a dog as a part of the family. ? Frequent the GGNRA dog-friendly sites almost daily for 5 years since Ella, an Aussie, joined our family with most GGNRA visits to Sweeney Ridge, Mori Point, Fort Funston, and Milagra Ridge. Before getting Ella, Sweeney Ridge was the only one of these GGNRA sites that I had visited more than once in 12 years in the Bay Area. Instead we tried to always go to new open spaces during our weekend hikes with Sweeney Ridge and Sawyer Camp / San Andreas / Canada Road trails being standard hikes/runs/bike that we did 4 or 5 times a month. We also had gym memberships which we no longer have since we can't exercise Ella and go to the gym. We find hiking so much more rewarding with Ella; we interact with so many more people because having a dog, like having a small child, facilitates social interactions that rarely happened without a dog ? Spent the past four months canvassing the GGNRA and other dog-friendly locations talking to people with dogs and raising awareness of the GGNRA plan. This included many discussions regarding the experiences and needs of people with dogs ? Co-author of the SaveOffleashOogs Call to Action weekly email regarding the GGNRA dog management plan and active member of the SaveOffLeash coalition with primary responsibility for grass roots organizing for San Mateo County, SFDog, and Ocean Beach Dog ? Member of the Peninsula Australian Shepherd Club, the Australian Shepherd Club of America, Ace Dog Sports, and the Bay Team (an agility organization) ? Over 20 years of experience as an auditor in public accounting firms and corporations and a Masters in Accounting Information Systems and a Bachelors in Agricultural Economics/Accounting ? Graduate of the SF SPCA Dog Training Academy, a six week intensive program taught by Dr. Jean Donaldson, a nationally recognized dog behaviorist ? SFSPCA volunteer trainer responsible for addressing more significant behavioral issues such as reactivity, fear, rude behaviors, and puppy socialization ? Grew up on a farm with a virtual zoo of animals related to this plan including dogs, horses, mules, deer, quail, geese, and ducks and in a rural areas with significant wildlife populations ? Read the 2200 Page DEIS and visited all but 3 of the 21 sites included in the plan plus visited the new lands at Rancho Corral de Tierra in Montara ? Analyzed the 2001 to 2010 GGNRA Law Enforcement Access data headers and the 2007 to 2008 pet-related cases in the PDFs ? Reviewed the available GGNRA inventories and monitoring reports provided by the GGNRA related to a Freedom of Information Act request ? Rely on the GGNRA for daily walks to help prevent morbid obesity, diabetes, heart disease, and breast cancer, which is prevalent in my

family as well as stress relief ? Rely on GGNRA to responsibly care for Ella, our dog, and for ensuring that she is a healthy and safe dog for the community and for those visiting our home ? Committed environmental advocate for addressing real issues that make the world a healthier and happier place for all our interconnected beings. Member of the Sierra Club

Correspondence ID: 4668 **Project:** 11759 **Document:** 38106

ID:

Received: May,31,2001 00:00:00

Correspondence Type: Letter

Type:

Correspondence: COMMENTS ON DRAFT DOG MANAGEMENT PLAN Submitted by Charles Pfister The following comments refer to specific page numbers/sections of the Draft Dog Management Plan.

P. 15 ' Wildlife: "Intensive dog use of an area could disrupt its use by wildlife The use of the adjective "intensive" is misleading and meaninglessly vague in this context. Dog use does not have to be intensive, in the sense of total number of dogs present, to disrupt wildlife. Unfortunately, even if most dog owners handle their chkges responsibly, one or two misbehaving dogs can ruin the attempts of the responsible owners to avoid disturbance and completely clear out kilometers of an open beach of shorebirds (see section "P. 797 Wildlife / Birds"). Synergistic impacts (Smit and Visser 1993) may magnify the impacts of a small number of off-leash dogs. At Ocean Beach on a warm day when the beach is crowded with people, a few off-leash dogs may represent a severe disturbance, because few alternative resting areas may be available.

Sandpipers and plovers, types of shorebirds found along sandy beaches and some fields in GGNRA, are known to have relatively high metabolic rates compared with other bird species (Kersten and Piersma 1987) and even short-term (and what might to some casual observers seem occasional and inconsequential) disturbance of feeding and migration behavior could have potentially serious consequences.

Using formulas to estimate energy expenditure by disturbed shorebirds, a shorebird biologist estimated that a certain species of shorebird would lose 25% of its daily energy requirement during migration staging if disturbed 20 times per day (Brian Harrington, Manomet Center for Conservation Science, personal communication, 2002). Goss-Custard et al. (2006) have used models based on an intensively studied population of oystercatchers in the baie de Somme, France to estimate that if the birds are disturbed more than between 1.0 and 1.5 times per hour in good feeding conditions or 0.2 to 0.5 times per hour in poor feeding conditions a reduction in fitness would result.

P. 19 Employee, Visitor, and Dog Health and Safety The total number of

leash law violations recorded by GGNRA and reported in this section is only the tip of the iceberg of orders of magnitude more incidents that actually occurred but were not detected and so should be noted in this section. Over the years, GGNRA has taken a "monkey, no-see" approach to enforcing the leash law and protecting wildlife and visitors from harassment by dogs. The number of violations should be seen in the context of how abysmally ineffective GGNRA has been in enforcing leash laws and protecting wildlife and visitor experience.

GGNRA has not used professional management techniques to protect wildlife and visitors from off-leash dogs. Such techniques would include reviewing enforcement attempts related to outcomes and adjusting methods to attain results; educating GGNRA law enforcement staff about how to recognize harassment of wildlife and visitors; and following up on reports by visitors concerning patterns of disturbance of wildlife and visitors by off-leash dogs. A FOIA request submitted in 2005 related to dog management did not show any evidence of professional management techniques related such as mentioned above. GGNRA also did not respond to dozens of complaints about dangerous situations for visitors related to off-leash dogs and harassment of wildlife by reviewing policies and procedures. Instead, GGNRA was more concerned with appearing to address the issue ' not with securing results. A result of such an approach is the current high rate of non-compliance concerning leash laws.

In a letter to me dated 8/9/2001 in response to my reporting chronic disturbance of shorebirds by off-leash dogs and the lack of protection provided by GGNRA, Superintendent Brian O'Neil invited me to report future incidents of wildlife harassment I observed to park dispatch. He did not offer any suggestion that GGNRA would engage in professional management techniques to address the .problem.

In fact in subsequent years, I frequently jogged on Ocean Beach, and in almost every instance observed multiple incidents of harassment of birds by off-leash dogs and violations of the leash law. Approximately 20 times I reported such harassment, as suggested by O'Neil, and waited at the site of the harassment to determine the outcome of my call. In no case did GGNRA respond soon enough to intervene in the harassment I reported. In no case did my call result in a report or citation being issued documenting the harassment. Most disturbingly, GGNRA did not show any indication of taking any initiative to prevent future instances of harassment of wildlife such as I reported. Some dispatchers seemed uninformed about the current regulations or even that disturbance of wildlife was illegal in GGNRA.

Some of the specific incidents on Ocean Beach included: ? 8/21/2004 5:30 - 6:00 p.m. -- Observed large flock of approximately 500 elegant terns and off-leash dogs ' no evidence of enforcement 6:00 p.m. -- Called in about

dogs. Told by dispatch that three rangers called in sick. 6:55 p.m. Saw terns flushed by two dogs off-leash. Called dispatch again. Was told two rangers had previously responded but found no indication of violations. The rangers were now at a rest stop but would respond again. 7:25 p.m. No evidence of further response.

? 3/21/2007 6:15 ' 6:25 p.m. ' Observed harassment of shorebirds by off-leash dogs and called dispatch. No response. 7:10 p.m. ' No response. Called to find out what happened. No record of explanation.

? 4/9/2007 5:15 p.m. ' Reported harassment of shorebirds by off-leash dogs. Ranger came within a few minutes but did not find harassment. Conversation with dispatcher ' he described how visitors put dogs on leash when they see rangers come and that there is a website with the location of park rangers. No mention of countermeasures. Called a second time because of continued harassment. No record of response.

? 9/21/2007 5:15 ' 6:00 p.m. ' Harassment of shorebirds: visitor throwing ball for dogs in snowy plover area of dunes; several dogs chasing birds along shoreline. No evidence of patrol. 5:44 p.m. ' Reported harassment of birds. 5:58 p.m. ' No response. Called again. Dispatch said ranger was en route.

? 11/3/2007 5:35 p.m. ' Reported golden lab chasing dogs in area Tarval to Ortega, going north. Approximately 100 shorebirds trying to feed at tide line; many off-leash dogs south of this area. 5:45 p.m. ' No response. Called again and spoke with "Vicky" the supervisor; no record of previous call. Will send someone out. No record of further response.

? 11/18/2007 11:15 a.m. -- Reported dogs chasing birds in snowy plover protection area. Dispatcher initially said that dogs off-leash were OK along the water. Gary, acting supervisor then got on the line and claimed what the dispatcher said was a "miscommunication" or "misunderstanding". He claimed that the snowy plover protection area is only the "dry" area of the beach. Excuses for not responding: oil spill, etc, etc. 11:30 a.m. ' I left beach. No response by this time.

? 12/31/2007 11:57 a.m. ' Reported two pit bulls off-leash approaching snowy plover area; chasing birds 12:02 p.m. ' No response. Dispatched stated that ranger had responded and was on the "street side" (i.e., Great Highway) but went up to look over the beach and saw no problem. I never observed the ranger in the area of disturbance.

? 3/7/2008 5:44 p.m. ' Reported several dogs off-leash running up and down the beach. Saw German shepherd chasing birds on tide line and several other dogs off-leash dogs. 5:59 p.m. - No response. Called dispatch, who reported that a ranger had responded by saw nothing. I never saw any ranger in the

area of the disturbance. ? 3/10/2009 5:07 p.m. ' Reported off-leash dogs chasing shorebirds 5:22 p.m. -- No response. Dispatch gave excuse of drugs and stolen car call at Presidio. Sending someone from Presidio. She will assess the situation. Dispatcher was not aware that my call was in the snowy plover protection area. Dispatch was not aware that dogs chasing shorebirds was not OK outside the snowy plover protection area.

P. 28 Dogs and Wildlife: "While it is generally well known and well documented that the presence of dogs in natural areas can result in disturbance to wildlife, studies reviewed as part of this analysis provide conflicting conclusions."

"Conflicting conclusions" is a misleading characterization. There is no scientific research that contradicts the fact that off-leash dogs frequently represent an intense level of disturbance for the primary type of situation of dogs vs. birds encountered in GGNRA: off-leash dogs disturbing shorebirds and other birds on open sandy beaches. See section "795 ' Wildlife / General Wildlife."

P. 794 -- Wildlife / Impact Thresholds The discussion of adverse impacts does not make sense. If an impact is not outside the "natural range of variability," then it is by definition not detectible. The phrase "natural range of variability" needs to be defined. It is not clear to me why the authors of this section require a park-wide effect to occur for an impact to be categorized as "major." It is not necessary to endanger a regional population of a species for the impact of disturbance in a specific area of GGNRA to be major. For example, any chasing of shorebirds by dogs of more than a few times per day, such as occurs almost daily at Ocean Beach, would be potentially a major disturbance impact in that area.

It should be noted that any dog allowed by its owner to chase birds or other wildlife is a violation of 36 CFR 2.2(a)(2) which prohibits harassment of wildlife. It is true that human visitors engaged in activities such as walking, surfing, fishing, and kite flying disturb wildlife to some extent. However, in almost no case is the disturbance as serious as the disturbance caused by off-leash dogs and the human disturbance is almost never intentional, and therefore does not violate 36 CFR 2.2(a)(2). The analysis of adverse impacts as Written appears to condone illegal activities under 36 CFR 2.2(a)(2) if there is no regional population impact. Harassment of shorebirds at Ocean Beach represents a particularly cruel form of harassment (see section "P. 797 Wildlife / Birds").

A more direct assessment of the impacts on wildlife in each section discussed, such according to criteria suggested by Pomeranz et al. (1988), would be more appropriate.

P.795 - Wildlife/General Wildlife Studies by Bekoff and Meaney (1997) and Forrest and St. Clair (2006) were cited in the Draft as examples of studies that suggest that there is no impact of off-leash dogs on wildlife.

An examination of these studies shows that both have little to no relevance to coastal disturbance issues in GGNRA. Specifically, the bird species included in the impact studies were songbirds and the habitats involved were forests and meadows: In these environments dog walkers traveled primarily along trails and disturbance was thought to occur intermittently (Bekoff and Meaney 1997) only when off-leash dogs left the trails. This disturbance scenario represents levels of disturbance much lower than in areas in GGNRA such as Ocean Beach or Crissy Field, where off-leash dogs potentially travel throughout the entire extent of wildlife habitat and even brief observation reveals that dogs frequently chase birds. In both of these studies available evidence suggested that dogs did not frequently leave the trails, so that in neither study was there any direct evidence that disturbance of birds by off-leash dogs was actually occurring. Therefore, the negative results of these studies may not represent any testing of the hypothesis that off-leash dogs disturb wildlife.

Addition discussion of each study: Bekoff and Meaner (1997) This study is primarily based on a survey of attitudes of visitors to open space areas in Boulder County, CO about dogs ' a survey that by the nature of the questions asked seems specifically intended to find support for allowing off-leash dogs in open spaces. A small part of the study consisted of alleged observation to detect any immediately observable impact on wildlife by dogs.

This part of the study is hopelessly flawed. Observations of dogs were made by an observer following dogs along a trail in various open space areas. Observations were allegedly made about the frequency of dogs disturbing wildlife: various mammals and several bird species (black-billed magpies, robins, dark-eyed juncos, mallard ducks, Steller's jays, and mountain and black-capped chickadees). The definition of disturbance of wildlife was "flushing or chasing." It was not clear whether the observers were qualified to determine whether birds were disturbed by dogs or whether accurate observations could have been made regarding all species of wildlife during the "real-time" observation relied upon to detect disturbance. It should also be noted that disturbance may not be immediately observable in terms of avoidance of dogs by wildlife (see below in this section and under "P. 1250 Special Status Species ' Western Snowy Plover / Ocean Beach"). It should be noted that songbirds are rarely susceptible to harassment or disturbance by dogs. Their habitats, behavior, and the lack of ability of dogs to stalk them make songbirds essentially invulnerable to disturbance by dogs, unless a human trains a dog to locate nests of ground nesting species.

The study authors claim that in 150 hours of observation, no observations

were made of birds being disturbed by dogs. However, the bird species included in the study are unlikely to be disturbed by dogs in their natural habitat, and observations also indicated that dogs rarely left the trail for a significant distance (a result that might also suggest observer effect.) Thus, it is not clear that disturbance of birds was even an issue in the study area.

The authors never specifically define what criterion would be used to determine whether disturbance of wildlife was occurring beyond "flushing or chasing." However, in the Discussion section, the authors suggest that they were using a highly restrictive, almost legalistic definition of disturbance. They claim to have seen only two instances of "earnest chases" of wildlife, in which it was "unambiguously concluded that it was the dog who initiated and maintained the chase." With such a convolutedly restrictive description of what was allowed to be considered disturbance of wildlife, it is no wonder that so few instances of disturbance were documented.

The authors of this study also make the incredible statement that: "All observers noted that dogs off-leash were friendlier than dogs on leash though no data were detailed data were collected on this aspect of behavior." The fact that the observers in this study would hold and even publish such a biased, unsubstantiated and subjective impression about off-leash dogs in an area of concern central to the study indicates that data regarding the disturbance of wildlife by dogs cannot be trusted nor can the authors' interpretation of the results of the study.

The conclusions of the authors regarding mammals have been superseded by a far more sophisticated study of the impact of off-leash dogs on mammals also along trails also in open space areas in Boulder County, CO (Lenth et al. 2008). This study compared various objective indicators of mammal activity along trails in open space areas in which dogs were prohibited vs. areas where dogs were supposed to be under "sight and voice control." The presence of dogs along recreational trails was correlated with altered patterns of habitat utilization by several mammalian species. This study showed how unreliable the methods and results were of the earlier study by Bekoff and Meaney (1997) and that their method of direct observation of dogs "flushing or chasing" wildlife did not detect significant disturbance impacts on mammals.

Forrest and St. Clair (2006) Another study cited, Forrest and St. Clair (2006), compared local diversity and abundance of mammals and birds in open spaces where visitors were required to leash dogs vs. areas where dogs were allowed off-leash. Most of the visitors traveled through the open spaces via trails. The study found that "off-leash dogs have no effect on the diversity or abundance of small mammals or birds in urban parks." However, the study has little relevance to the issues at hand in GGNRA, as the study involved songbirds, not shorebirds, and the habitats in the study were

generally not comparable to GGNRA, especially the open beach area used by shorebirds in GGNRA.

Even if the result of the study that off-leash dogs do not impact birds were potentially relevant to GGNRA, the authors of the study present a long discussion showing why the negative result of their study may not be valid.

? Local diversity and abundance may not be a good indicator of the impact of disturbance on a species. ? The authors indicate that evidence shows that there may have been a high rate of non-compliance of leash laws so that "the functional differences in our leash designation treatments and, consequently, differences in our response variables..." were possibly invalid. ? The authors state that observations made in the field suggest that dogs did not stray far from trails in most habitats, so there may have been little actual disturbance of wildlife over the areas used as treatment locations in the study. Therefore in this scenario: "...dog activity is restricted to such small temporal and spatial scales that its effects are negligible." ? "A third reason that leash designation may not affect birds and small mammals ... is because these communities may already have responded to the presence of wild coyotes."

Thus the result of the study that off-leash dogs do not affect wildlife is dubious, according to the authors themselves.

Citing of these two barely relevant or irrelevant studies in a paragraph beginning with a cursory two sentences with no citations discussing the impacts on wildlife of off-leash dogs presents a bizarrely skewed account of the relevant scientific literature and probable impacts on wildlife of off-leash dogs in GGNRA. These studies are referred to in several occasions in the Draft without the shortcomings and lack of relevance being discussed.

In other sections, the Draft cites some studies that show or infer that dogs represent an especial disturbance to wildlife. Studies not cited of particular relevance to GGNRA that show impacts of dogs or identify dogs as likely factors in general human disturbance of birds in coastal environments include: ? Davidson and Rothwell (1993) ' In a summary of research on the effects of human disturbance on waterfowl and shorebirds during winter and spring and fall migration it was found that on tidal flats, moving people and animals (especially dogs) generally create worse disturbance than sedentary people. ? Kirby et al. (1993) ' At an estuarine beach in Wales, a traditionally important roost for several shorebird species, including black-bellied plover, red knot, sanderling, dunlin, and bar-tailed Godwit, dogs caused 27-72% of total disturbances observed per year. ? Keller (1991) -- At low tide, 70% of disturbances of eider ducklings were caused by dogs with or without people, while people without dogs accounted for 9%. Broods were disturbed by dogs for significantly longer periods than by walkers or anglers and at about twice the distance. ? Pfister et al. (1992) ' Disturbance at a high tide resting area at

a coastal barrier beach displaced shorebirds and seemed to cause long-term declines in abundance. Most disturbance was believed to be caused by pedestrians and off-leash dogs. ? Scott (1989) -- Dog-walkers were the most frequent cause of disturbance of shorebirds at a coastal estuary. ? Smit and Visser (1993) -- A summary of Dutch research from reports not normally accessible to English-speaking scientists concludes that running dogs are very disturbing to shorebirds. ? Thomas et al. (2003) -- Human disturbance reduced the amount of time sanderlings spent foraging on two Central California beaches. The most significant factor was the presence of free running dogs on the beach.

P. 797 Wildlife/Birds In general scientists have not frequently done specific research regarding the impact of dogs on wildlife, since the severity of the disturbance is obvious in many cases. Most of the relevant research exists under more general disturbance topics. The relevance to disturbance by dogs can be inferred from the research results and knowledge of the biology of bird species and the site characteristics in GGNRA.

The literature summary in the Draft is primarily concerned with the general issues of the disturbance dogs may cause to wildlife. The literature review should be extended to focus on specific disturbance and other conservation issues related to GGNRA. For example, dogs are often mentioned as an especially intense form of disturbance in bird disturbance studies in coastal environments (see above in section "P. 795 ' Wildlife / General Wildlife").

It is virtually impossible to quantify the overall impact of a specific factor, such as disturbance by dogs, on shorebird populations because of the enormous difficulty and expense of obtaining the necessary data. Colwell (2010, pp. 284-286) summarizes some studies of behavioral responses of shorebirds to disturbance, indicating that many of the studies focused on measuring foraging responses to disturbance. However, the full implications of ongoing chronic disturbance of shorebirds by dogs such as occurs in GGNRA must be discussed primarily in theoretical terms.

A previous study (Pfister et al. 1990) found that intermittent disturbance along a beach of similar length to Ocean Beach resulted in reductions of shorebird numbers of species using the beach for a high tide roost of up to 50% within a year and probably caused some species to abandon the beach entirely over time. In this study, however, disturbance only occurred at high tide. Therefore, disturbance at Ocean Beach may be far worse, since shorebirds seem obligated to use the zone of maximum disturbance at the tide line for feeding (see below). It should also be pointed out that in the Pfister et al. (1990) study shorebirds had alternative roosting areas within a few miles. This does not appear to be the case at Ocean Beach.

Disturbance of shorebirds may be hard to observe at Ocean Beach, because

once aggressive dogs are present, birds scatter and are not easily observed. For example, on April 8, 2000 during the peak of northbound migration of shorebirds, I walked along the beach south of Sloat Boulevard. I counted approximately 300 large shorebirds (whimbrels; willets; and godwits) intensively feeding at the edge of the surf. At this time there were no dogs on the beach. Within approximately 90 minutes many dogs were on the beach and most of the birds had been dispersed. At this later time an observer would never have known about the earlier assemblage of large shorebirds and would have not realized that such severe disturbance had occurred.

The following is a discussion of various issues related to the impact on shorebirds of off-leash dogs at Ocean Beach.

? Lack' of alternative resting areas

Based on observations I have made at Ocean Beach, it has become clear to me that the vast majority of shorebirds at Ocean Beach remain on site continuously for both feeding and resting and do not "commute" to other parts of San Francisco Bay at various tidal cycles or due to disturbance. I have inferred this fact by comparing counts of shorebirds on consecutive days and by the fact that I have never seen flocks of shorebirds or individuals flushed by disturbance travel in any other direction than along the beach. Because the shorebirds at Ocean Beach do not appear to have alternative roosting areas where they can seek refuge during periods of disturbance, they are subject to the full impact of disturbance with potentially more serious consequences (Colwell 2010, p. 281).

? Shorebirds exposed to intense disturbance while feeding at the tide line.

Shorebirds at Ocean Beach/Fort Funston generally remain along the tide line -- where most dogs are walked by their owners -- for foraging. The primary prey species of most shorebirds appears to be the sand crab, probably *Emerita analoga* (Ricketts et al. 1985; p. 252). Foraging behavior of the sand crab (Ricketts et al. 1985; pp. 252-3) seems to correlate well with the behavior of feeding shorebirds. Specifically, the crab moves up and down the beach to remain in the zone of breaking waves and emerges from sand that has become fluid by water movement in the "wash zone." Thus, the fact that shorebirds congregate at Ocean Beach at the edge of the surf (often jumping into the wash zone) is probably explained by the fact that they are tied to this area in order to forage on sand crabs.

The degree of disturbance by off-leash dogs along the tide line at Ocean Beach/Fort Funston can be catastrophic. When large numbers of shorebirds are present, inevitably off-leash dogs chase the birds up and down the beach. Some persistent dogs will continuously harass and chase flocks of birds for hundreds of meters or more up and down the beach. Given that the

shorebirds are tied to the tide line in order to get their food for survival, it is hard to imagine a more cruel and brutal form of human disturbance of wildlife in nature.

? Narrow beaches increase impact of disturbance

At higher tides shorebirds are forced from preferred feeding areas around Sloat Boulevard; at many mid-tide levels shorebirds there are wedged against the cliffs of Fort Funston and are unable to avoid passing foot traffic. One off-leash or even a leashed dog would be capable of flushing birds from an entire segment of beach under these conditions.

? Areas of cover scoured by storms and sand removal

In the winter, storm surges and high tides sometimes scour the beach in the Snowy Plover area on Ocean Beach. The area where the plovers normally seek refuge among debris at the back of the beach becomes flatter and swept clean of debris. This condition also occurs after sand removal. Under these conditions, western snowy plovers, sanderlings, and other shorebirds and other bird species are exposed to more disturbance from humans and dogs due to lack of cover and protection in resting areas.

? Larger flocks targeted by dogs

Off-leash dogs appear to affect the flock structure of shorebirds. Large flocks of shorebirds are thought to be more vulnerable to disturbance (e.g., Smit and Visser 1993), and my observations over the years indicate that large flocks of shorebirds present tempting targets to off-leash dogs. I have found congregations of up to approximately 300 larger shorebirds (willets, godwits, whimbrels) during both northbound and southbound migration on numerous occasions south of Sloat Boulevard. There have been congregations of up to 500 smaller shorebirds, primarily sanderling, further north between approximately Noriega and Taraval. In addition, this area is used in the fall by terns. In the fall of 1998 I observed approximately 1000 elegant terns in this area resting on the beach.

Flock structure is believed to confer benefits to shorebirds, including increased foraging efficiency, defense from predators, and successful migration strategies (Colwell 2010, pp. 188,193). The disturbance from off-leash dogs tends to break down' the flock structure and scatter shorebirds into small isolated groups.

Although I accept the general concept of the Preferred Alternatives in allowing some portions of the beach area to be used by dog walkers with off-leash dogs, these sections need to be greatly confined so that most of the beach areas do not have off-leash dogs and birds can avoid the sections of

beach disturbed by off-leash dogs.

P. 802 Compliance-Based Management Strategy The 25% compliance rate target is far too low to protect wildlife or visitors. Goss-Custard et al. (2006) have used models based on an intensively studied population of oystercatchers in the baie de Somme, France to estimate that if the birds are disturbed more than between 1.0 and 1.5 times per hour in good feeding conditions or 0.2 to 0.5 times per hour in poor feeding conditions a reduction in fitness would result. As discussed in other sections, just one or two aggressive dogs can wreak havoc in an area of shorebird concentration. Some areas of GGNRA are visited by dozens or even hundreds of dogs per hour. If 25% of these in a controlled area are still off-leash, the character of the area related to wildlife and visitor experience would still be that of an off-leash area.

A 2005 FOIA request did not show that GGNRA had any method of tracking repeat offenders regarding leash law violations or other bad behavior of their dogs. The level of contempt for the law and public safety expressed in various incident reports by dog walkers indicates that any fines for dog-related violations must be severe in order for compliance to be a realistic goal.

In preparing a final Dog Management Plan, NPS should investigate reports that in the past 15 years, GGNRA has transferred rangers who enforced the leash law when complaints about a specific ranger were received from dog walkers who were irritated with the leash law being enforced. The reasons for GGNRA's pathetic performance in protecting wildlife and visitors from off-leash dogs needs to be fully explicated so that in the future "compliance-based management" is credible.

Although I accept the idea of compliance-based management, GGNRA should not completely rely on compliance to assess and implement the DMP. Changing environmental conditions, changing wildlife populations, and changing visitor behavior could undermine various assumption in the DMP. GGNRA should continue to monitor the outcomes of its policies and be able to adjust the DMP related to factors beside the compliance rate.

P.1250 Special Status Species - Western Snowy Plover/ Ocean Beach A number of studies done by GGNRA regarding the western snowy plover are cited but not discussed in detail. These studies are, however, often picked apart by non-scientist off-leash dog advocates, suggesting that the studies have failed to find any evidence of disturbance of western snowy plovers by dogs.

I have previously reviewed a number of these studies as cited in the Draft.

The number of instances of disturbance and harassment of western snowy plovers reported by NPS is small because the sampling method used by NPS: 1) involved observers moving down the beach and surveying an entire segment of the beach and not watching specific flocks of plovers and 2) the sampling method did not attempt to specifically include observation periods when the level of disturbance was mostly likely to be severe, so the periods of peak disturbance, which may be very significant in assessing overall impacts, are not represented in the data.

Regarding: ? Hatch. 2007. Status Report: Western Snowy Plovers and Recent Changes in Human and Dog Use Within the Snowy Plover Management Area at Ocean Beach...."

I reviewed a draft of this report dated 5/14/07. The use of "encounter rates" as a measure of the rate of disturbance is an attempt to use the data set for something it is just not suited for. It is not possible to justify obtaining "encounter rates" from observations made along a transect. Even assuming the observer could perfectly observe all birds and disturbance within a "sector," the study appears to overestimate the time an observer could make observations within a sector. When the observer is half way through a sector, half the sector is behind him/her and events in that portion are no longer observable. Shorebirds, including western snowy plovers, have a patchy distribution on the beach. If within a sector, a major flock is located in the beginning portion of the sector, during most of the observational period, this flock will not be visible to the observer. Thus, while the study suggests that an observer was within a western snowy plover area for 15 hours/year (i.e., "the amount of time window in which observers can actually observe potential impacts to western snowy plovers -- p. 7"), the effective amount of time in which disturbance could actually be observed would be closer to 7.5 hours than 15 hours (given a perfect observer), if one were to accept the concept of "encounter rate." However, the actual number of hours of effective observations of plovers is probably much less, since it is hard to imagine that an observer could accurately observe all disturbances of these small, cryptically-colored birds from distance of more than 100 feet, assuming the observer had already spotted and was carefully watching a bird or flock. The actual number of hours of observation in which useful observations might have been made of western snowy plovers on Ocean Beach could be as low as 2 or 3 hours or less per year in all observations combined. Given all the factors involved in determining the behavior, distribution and abundance of snow plovers, this is a pathetically low number of observational hours from which to draw any conclusions.

The study also failed to adequately survey the beach during the relatively narrow windows of peak northbound and southbound migration of shorebirds, when critical disturbance would be likely to occur. The study failed to take into account differential behavior and distribution of western

snowy plovers based on the amount of dog and pedestrian traffic on the beach (Baye 1995). For example, a few dog walkers with aggressive off-leash dogs could displace plovers from feeding on the front of the beach, yet a survey would not find any disturbance issues, since the plovers would have already been displaced, and there might be few dog vs. plover interactions during the survey.

Because of the sampling method, there is so much variation in such variables as "Dogs Per Hour Chasing Shorebirds (p. 13)" that such variables are not really useful for statistical analysis or even biological interpretation. Median or average values of disturbance rates have little usefulness in assessing disturbance at Ocean Beach. On some dates or times, there are virtually no pedestrians and dogs on the beach; at other times, there may be numerous dogs but because of previous severe disturbance, little interaction between dogs and birds. Averaging data of surveys from these cases with surveys with more intensive dog/bird interactions would tend to obscure the nature of the impact of dogs on birds.

The study found average "Dogs Per Hour Chasing Shorebirds" of between 0.14 and 1.92 (p. 11). I have sought out situations in which disturbance was likely to occur and frequently made observations suggesting rates of over 20-30 disturbance incidents per hour for shorebirds (regarding a specific flock or sector of the beach). In a one-hour observational period in 2006, I observed five disturbance incidents regarding western snowy plover roosting in a mixed flock of other shorebirds, primarily sanderlings. Apparently, in one hour I observed more instances of dogs disturbing western snowy plovers than in the entire five years of this study (p. 11).

NPS apparently uses the correlation between the number of dogs vs. western snowy plover abundance as evidence that dogs impact plovers. Although the conclusion may be somewhat relevant, I think that the weakness of the correlation is more significant than its statistical significance. The correlation is much weaker than found in a similar correlation between a disturbance index and local abundance of various shorebird species (Pfister et al. 1992). Gill et al. (2001) discuss scenarios in which wildlife that exhibit a weak avoidance behavior towards a disturbance may actually be impacted by disturbance more than a species that exhibits strong avoidance behavior. This occurs because a species has no "suitable alternative habitat" and will be forced to remain in a highly disturbed area, regardless of whether its fitness or survival is impacted by disturbance.

"From a population viewpoint, the species most likely to be adversely affected by disturbance are those for which the fitness costs are high but they have little excess habitat to move to ... and are thus constrained to stay in disturbed areas and to suffer the costs in terms of reduced survival or

reproductive success."

I believe that this is the case with western snowy plover at Ocean Beach.

NPS has focused most of its survey and research effort on western snowy plover and hardly mentions other bird species that are harassed and disturbed by dogs. A number of bird species commonly found in GGNRA are listed in the 2007 United States (Yellow) Watch List (a joint project between American Bird Conservancy and the National Audubon Society -- <http://www.abcbirds.org/abcprograms/science/watchlist/index.html>). Such a list includes species that are not yet listed as threatened or endangered but after a conservation analysis are believed to be in greatest need of immediate conservation attention to survive a convergence of environmental challenges, including habitat loss, invasive species, and global warming.

Species on the list that I have observed to be subject to harassment and disturbance by dogs include: Elegant tern, Sanderling Long-billed curlew
Marbled godwit

These species and other birds harassed by dogs should have been discussed in the Draft.

P. 1401 Visitor Experience Use and Experience This section is extremely weak. Lumping all visitor who are against off-leash dogs in GGNRA as "visitors who would prefer not to have dog walking in GGNRA" does not begin to characterize the nature and variety of ways visitor experience can be impaired by dogs and off-leash dog walking in GGRNA and trivializes the intensity to which the presence off-leash dogs may cause feelings of fear and unpleasantness to visitors.

Various subgroups of visitors have extraordinary safety concerns because of off-leash dogs, including: 1) the elderly; 2) visitors with young children; 3) horseback riders and other special users; 4) blind and disabled visitors; 5) various minority groups; and 6) visitors who suffer from fear of dogs because of previous experiences or for other reasons. For many in these groups, an off-leash dog area may represent a flat out "no go" area.

For visitors who do not necessarily have extraordinary safety concerns, the impact on their experience in visiting GGNRA due to dogs, especially off-leash dogs, can also be strong enough to displace them from off-leash areas. Many visitors enjoy the opportunities GGNRA offers to escape the urban environment and experience nature, solitude and even almost wilderness. Off-leash dogs can completely destroy the quality of this experience for many visitors.

A study of visitor experience related to dogs in open space areas in Boulder,

CO (Vaske & Donnelly 2007) indicated that a significant proportion of visitors to open space areas reacted strongly to negative behavior associated with off-leash dog walking . A total of 951 visitors, both dog owners and non-dog owners, completed questionnaires regarding their attitudes towards potentially disruptive behavior by dogs. Those dog behaviors were classified as "direct" and "indirect" and were as follows:

Direct behaviors: ? Dogs jumping on a visitor (60%) ? Dogs pawing a visitor (50%) ? Dogs licking a visitor (35%) ? Dogs sniffing a visitor (23%) ? Dogs approaching uninvited (36%)

Indirect behaviors: ? Owners not picking up after their dogs (79%) ? Dogs causing wildlife to flee (57%) ? Dogs flushing birds (46%) ? Owners repeatedly calling their dogs (31%) ? Dogs off trail (18%) ? Dogs "play" chasing another dog (18%)

Respondents were asked about their attitudes towards experiencing those behaviors in open space area. The percentage for each category listed above indicates the percentage of respondents who felt the behavior was a "moderate" or "extreme" problem if it occurred during visitation.

Additional analysis of the data indicated that for 9 of the 11 behaviors visitors indicated "no tolerance" norms even for only one occurrence of the behavior. Such a result can be interpreted to mean that the given behavior is unacceptable and there is no tolerance for the behavior if encountered by visitors.

The results of the study by Vaske & Donnelly (2007) suggest that the negative behaviors many visitors associate with dogs in natural areas are not simply minor irritants but could potentially spoil the entire experience for the visitor. Such an interpretation is consistent with my own experience that many friends and acquaintances completely avoid areas of intense off-leash dog activity in GGNRA, such as Crissy Field, Fort Funston, and Ocean Beach.

A factor not discussed by NPS in the Draft is how the presence of off-leash dogs affects the carrying capacity of GGNRA. Carrying capacity is the level and type of recreation use that can be accommodated in a park without violating standards for relevant indicator variables (Manning 2007, p. 25). In terms of the indicator of visitor experience, different user groups probably have widely different tolerance levels of the presence of dogs and dogs off-leash. The stratified results of the 2002 Survey regarding such issues as attitudes towards leash laws undoubtedly reflect such differences.

A quantitative study by Arneburger et al. (2004) showed that the presence of off-leash dogs in an urban park made a remarkable difference in the degree

of tolerance of visitors for crowding in the park. The presence of off-leash dogs decreased the tolerance of visitors to social conditions such as crowding. A certain degree of crowding of visitors that might be acceptable with few or no dogs off-leash became unacceptable when many visitors had dogs off-leash. Such a result is intuitively obvious at areas of GGNRA where visitors with off-leash dogs congregate, such as Crissy Field or Ft. Funston. Active off-leash dogs may seem to take up all the space between people and create a greater sense of crowding than would otherwise occur.

Anywhere in GGNRA where large numbers of dog walkers and other visitors congregate, the potential exists for visitor tolerance of crowding to be exceeded due to synergistic impacts of off-leash dogs, social crowding, safety concerns, and many other factors. Although there are no studies specifically addressing the idea of carrying capacity in GGNRA, the results of the 2002 Survey should provide some clues as how certain user groups may be view carrying capacity and be displaced from off-leash dog areas. The idea of a carrying capacity was not discussed by NPS in the Draft at all.

The fact that dog walking, especially off-leash dog walking, in GGNRA potentially excludes many user groups and a large proportion of potential visitors must be explicitly discussed and the ramifications for the mission of the NPS resolved for any alternative allowing off-leash dog walking.

P. 1402/3 -- Visitor Experience / Impact Thresholds The definition of a "major" and "moderate" impact as defined requires consideration of whether other Park areas are available to visitors if a specific area receives an impact. The definition of "major" and "moderate" should only refer to the impact within the area being considered. If off-leash dogs make an area so uncomfortable for a significant proportion of visitors that the visitors are displaced from that area, then the impact is "major" for that area.

If a significant number of visitors do not tolerate dogs in an area where off-leash dogs are present, then my view is that this is a major impact, since a significant number of visitors may be displaced from a specific area. The only way visitors could avoid feeling unsafe or uncomfortable in an area where off-leash dogs are present, would be to have enough space to completely avoid encountering off-leash dogs. This is usually not possible at some of the most popular areas in GGNRA, including Ft. Funston, Ocean Beach, and Crissy Field. It is likely that a significant proportion of potential visitors are displaced from off-leash areas (see below under "P. 1404 Visitor Experience / Visitors Who Do Not Have a Preference about Dog Walking in GGNRA").

P. 1403 -- Visitor Experience / User Groups The designation of three user groups, essential pro-dog, anti-dog, and neutral, is an arbitrary and extremely

oversimplified approach to evaluating visitor experience.

P. 1404 Visitor Experience / Visitors Who Do Not Have a Preference about Dog Walking in GGNRA This section refers to the 2002 Social Research Laboratory survey results that 49% of respondents reported that off-leash dogs had no impact on their experience. The survey results actually are that 49% of respondents who had seen off-leash dogs believed that off-leash dogs had no impact on their experience. This section incorrectly assumes that this results means that these 49% of respondents represent a user group that as "no preference" regarding the presence of off-leash dogs in GGNRA. This assumption is false, because the survey results did not question the respondents as to what their attitudes would be if the respondents had experienced some type of negative behavior associated with off-leash dogs, such as categorized by Vaske & Donnelly (2007). (This false assumption should have been obvious to NPS, as over half of the respondents opposed off-leash dog walking.)

A more rigorous interpretation of the results of the 2002 Social Research Laboratory by reference to the study by Vaske & Donnelly (2007) suggest a more likely characterization of user groups is that the 36% of respondents who "strongly oppose" off-leash dog walking in GGNRA as identified by the survey represent a collection of user groups who have extraordinary safety concerns, general safety concerns, and/or find that many of the negative behaviors of off-leash dogs strongly impact their visitor experience. It is likely that the 17% of respondents who "somewhat oppose" off-leash dog walking have some safety concerns and/or find negative behaviors associated with dogs moderately impact their visitor experience.

It is possibly or even likely that the 36% figure of respondents strongly opposing off-leash dog walking represents an approximation for the proportion of visitors who would likely be displaced from areas where off-leash dog walking occurs and cannot be avoided by visitors.

No doubt that dog owners wishing to walk their dogs just as vehemently want access to off-leash dog walking areas as those who wish to avoid dogs. NPS must recognize that ultimately off-leash dog walking not only diminishes the visitor experience for many but even excludes a large proportion of potential visitors.

P. 1591 Human Health and Safety Although actual attacks involving dogs biting and knocking down visitors to GGNRA may be relatively infrequent, any exposure to off-leash dogs potentially involves considerable risk. Certain user groups, such as the elderly and young children, are known to be particularly vulnerable to serious injury when bitten by a dog. More troubling, it is not possible to predict when and where a serious attack might occur. One study showed that in the case of serious attacks by dogs on a

child, 66% of dogs had never previously bitten a child, and 19% had never bitten any human and 66% of owners had taken their dogs to obedience training classes (Risner et al. 2007). According to Dr. Gail C. Golab, director of the American Veterinary Medical Association's Animal Welfare Division, "Any dog can bite... Even the gentlest dog, if it is physically or mentally unhealthy, is in pain, feels threatened, or is protecting its food or a favorite toy, can bite (quoted in USPS 2011)." When an attack does occur, there is a significant chance of a fatality. One study estimated that a risk of 2 fatalities per 1,000 reported dog bites exists nationwide (Wright 1985).

A dog bite is a common type of injury (Holmquist & Elixhauser 2010). One study found that approximately 1 in 50 patients treated in emergency rooms suffered from a dog bite (Beck et al. 1975). It is estimated that half of all children in the U.S. suffer a dog bite injury by the time they are high school seniors (Dr. Alison Tothy, American Academy of Pediatrics, Illinois Chapter, quoted in USPS 2011). The exposure to risk increases in areas of GGNRA that become crowded in terms of both visitors and dogs. Visitors may have few opportunities to avoid direct encounters with off-leash dogs. In addition groups of dogs such as brought by commercial dog walker or that form when various visitors allow their dogs to congregate increase the safety risk due to aggression characteristic of pack walking and the increased likelihood of social and re-directed aggression .

Visitors to GGNRA who have been bitten by a dog or who recognize the danger of off-leash dogs may well have a fear of dogs that would limit their enjoyment or preclude their visiting an area where off-leash dogs are allowed.

Although few studies seem to exist regarding human psychology and attitudes towards negative behaviors of dogs, NPS needs to recognize that potential safety issues are very real in the minds of visitors and have a significant impact on an individual's psychology and ability to enjoy the visiting experience. Niktina-den Besten (2008) found that the presence of dogs was a significant negative factor in the child's mental map of a neighborhood.

The Draft does not acknowledge that visitors to areas where off-leash dogs are allowed are potentially subjected to unmitigated encounters with large and powerful off-leash dogs. There is little the visitor can do to mitigate exposure to the risk of being charged or attacked by dogs in such cases. Such encounters can be especially frightening in relatively isolated areas with no cover, such as Ocean Beach.

One implication of my analysis of the impacts of dogs on visitor experience and human health and safety is that major areas of GGNRA should provide access to visitors to allow them to experience significant portions of each

area without encountering off-leash dogs. For example, at Fort Funston, visitors should be able to enjoy portions of the bluff and beach and a pathway in between without encountering off-leash dogs.

P. 1595 Human Health and Safety / Park Staff Health and Safety Impacts
The belligerent behavior of some dog walkers towards NPS Staff should not be considered as a factor in the Plan. A user group that resorts to intimidation and violence should not be rewarded with mention in this context. Park staff should be trained and equipped to enforce laws and regulations in the public interest.

Appendix E: Guidelines for ROLAs ' Voice Control
The guidelines for ROLAs require dogs to be under "voice and sight control at all times, meaning that dogwalkers must be able to recall their dog promptly, and shall demonstrate this when required by Law Enforcement personnel." As written, this requirement is meaningless and unenforceable. An individual might be able to demonstrate voice control in one situation, when in a more crowded environment or in a location with a large flock of birds or other tempting wildlife targets, the dog might react completely differently. I suspect that NPS has issued very few citations for 36 CFR 2.34(a)(4) and that such a code would not be an effective tool for insuring that "voice control" guidelines are followed.

In my experience "voice control" has in any case not been a successful or realistic concept. Dogs owners frequently do not consider it necessary to prevent their dogs from engaging in harmful and disruptive behaviors such as categorized by Vaske & Donnelly (2007). When they do show sensitively towards impacts on other visitors, dogs, or wildlife, the owners frequently do not attempt to control the dog until the harmful behavior has already occurred. It does not make any difference if a dog owner can "promptly" recall a dog, if the harmful behavior has already occurred. It does not seem possible that a commercial dog walker or any other park user walking two or more dogs could effectively exercise "voice and sight control at all times" over all his/her dogs.

Furthermore, although relying on the concept of voice control for decades, it does not appear that GGNRA has ever evaluated the effectiveness of voice control. In responding to a FOIA request for records of citations issued related to failure to exercise voice control, GGNRA reported that they had no way of searching their records for that information. Available information suggests that voice control is not effective in protecting wildlife or visitor experience. By proposing an unproven and untested concept of "voice control," NPS would be creating zones where visitor safety and wildlife protection could not be assured. This has essentially been the status quo for most of GGNRA in past years. However, if such areas are formalized and legalized, visitors from vulnerable user groups should be warned not to enter

these areas, as their safety cannot be guaranteed.

A "voice and sight control" regulated area in Boulder County, CO did not prevent disturbance of wildlife (Lenth et al. 2008).

GGNRA should analyze dog citations by zip code to determine whether education is even a feasible method of increasing compliance with restrictions on dog walking. If citations are mostly for dog owners in the media market near GGNRA, it is unlikely that any action but increased enforcement would change compliance rates.

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Correspondence ID: 4669 **Project:** 11759 **Document:** 38106

Received: May,11,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

Thank you for the opportunity to comment on the Dog Management Plan and Draft EIS (Plan). As a native San Franciscan and a volunteer in the GGNRA for over a decade, I know this has been a long and difficult process that included all affected parties (or almost all; volunteers in the GGNRA were not represented as a distinct group). While some of those parties chose not to participate in the process in good faith, it is a plan that I fully support

I understand that those who advocate for unrestricted access for their unleashed dogs are a vocal and emotional minority, nonetheless they are a minority. The Golden Gate National Parks belong to all citizens, not just those with dogs and not just those living in the San Francisco Bay Area. Ideally, the GGNRA would come into compliance with other national parks, but I understand and appreciate that some allowances must be made.

That being said, I fully support the National Park Service (NPS) Preferred Alternative for all areas of the GGNRA. I believe that our national parks are for people's enjoyment and contemplation of our nation's natural wonders.

My specific comments regarding the Plan

? Natural resources staff should not have to deal with unsafe and/or hostile working conditions, namely being bitten, charged or otherwise harassed by dogs running offleash in natural areas, or endure verbal abuse by dog owners. ? Likewise, visitors should not have to deal with dogs running offleash in areas where quiet contemplation is expected. It is frightening to see a charging dog and not know its intention. This is not an enjoyable park experience and not why people visit national parks.

? There should be no trails where dogs are allowed to roam offleash under "voice control" alone. I have personally witnessed many instances where

owners have had to call their dogs three, four, five and more times to get them to return. That is not control

? Professional dog walkers should be required to obtain a use permit. They make a profit off public lands yet do nothing to maintain the areas that they use

? All dogs in the GGNRA should be required to have a current license, although I understand that this requirement may be outside the scope of the Plan.

? Most dogs are well behaved, yet it only takes one to harass wildlife, something that I have witnessed more than once, most recently a dog charging a great blue heron. I do not necessarily fault the dogs ' they are doing what seems natural - but I do blame the dogs' owners who either ignore or are oblivious to this behavior. The people should know better to respect the wildlife that makes the GGNRA its home ? It is quite illuminating that almost all parks and trails in the municipalities surveyed allow dogs only on leash or in designated areas. The Plan allows dogs off leash in more areas than any national park, and more than in most local parks as well, including those in San Francisco.

? The fact that the San Francisco Board of Supervisors does not support the plan should have absolutely no bearing on the decision making process. They have chosen not to educate themselves on the issues and do not speak for the majority of San Franciscans, including me. The fact that the GGNRA is designated as a recreation area means the NPS has a special responsibility to protect water and shore birds.

? Consistent and continual education and enforcement will be necessary for the foreseeable future. I hope that the NPS is committed to this. It will not be a pleasant duty, and I hope that the park staff who will enforce the plan will be fully supported by their supervisors and upper management.

I am concerned that you and other officials have heard only from those opposed to the Plan. I also understand why this may be the case. Public hearings on this issue have been uncivil, with advocates for unrestricted offleash dogs in the GGNRA shouting down or ridiculing those with opposing views. The result is a hostile environment in which many thoughtful individuals may choose not to publicly participate in the process. Should the Plan not be adopted, they will express their views by not visiting or otherwise supporting the GGNRA.

This is not how government should work. Those who shout the loudest should not inevitably get their way. I understand that emotions run high in this vocal minority of individuals. However, that does not excuse the

embarrassing denial of democracy.

The Plan allows more access to dogs off leash than any other national park in the country. It puts reasonable restrictions on professional dog walkers who make a profit off public lands. It preserves our natural lands and protects wildlife. It protects visitors and park employees, some of whom have been bitten, charged or otherwise harassed by dogs off leash and, I might add, by their owners_ It also protects dogs by ensuring that everyone follows the same rules.

The GGNRA belongs to all citizens, not just those with dogs living in the San Francisco Bay Area. Everyone deserves a place where they can enjoy the quiet respite that a national park provides, especially in an urban area. No other national park allows unrestricted access to dogs off leash. Neither should the GGNRA.

Thank you, Sharon Tsiu San Francisco, CA 94121

Correspondence ID: 4670 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

On behalf of the Fort Funston Dog Walkers, and as a member of the Eco-Dog coalition, I am submitting comments on the Dog management Plan DEIS as well as suggestions for a preferred alternative for Fort Funston.

I look forward to working with the Park Service on a plan that preserves recreational values while providing protection as needed to preserve natural resources.

Regards Linda McKay Fort Funston Dog Walkers 241 Tocoloma Ave. San Francisco, CA

CC:

Ken Salazar, Secretary of Interior
Jon Jarvis, National Park Service Director
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Nancy Pelosi, House Minority Leader, U.S. House of Representatives
Representative Jackie Speier

Indirect Impacts in Adjacent Parks

No page reference provided ' reference to "no impact to adjacent parks" is

found throughout the DEIS.

The DEIS completely fails to adequately assess impacts to adjacent parks, and fails to identify what "adjacent" means in this context. Adjacent to the GGNRA? Or adjacent to the people impacted by the alternative?

People come from all over the Bay Area to walk their dogs at Fort Funston and Ocean Beach. Impact on adjacent parks might include a number of different cities and counties, not just San Francisco.

By Park Service estimates in 2000, over 750,000 people visit Fort Funston each year. By our own analysis, between 74% and 96% of visitors are accompanied by a dog (lower numbers in areas adjacent to the parking lots; higher numbers further along the trails ' which reinforces our conclusion that dog owners want a recreational experience ' we want to hike with our dogs).

(Refer to Park Service documents Proposed Habitat Protection Closure, Fort Funston, Golden Gate National Recreation Area. July 17, 2000, and the National Park Service Survey Conducted at Fort Funston in August 1999).

Using 2000 Fort Funston visitor counts, assuming that 75% of the visits are with dogs, and assuming that under an alternative that drastically restricts off-leash areas, 50% of the visitors will use more convenient local parks ' this means that there will be an additional 280,000 visits to local parks each year. Not insignificant!

Site-specific estimates are needed for 1/number of current visitors, 2/number of visitors who are accompanied by a dog, 3/where these visitors live, and 4/ an estimate of how many existing visitors would use their local parks under each alternative.

Based on this data, each alternative needs to be updated to include an accurate assessment of impacts to adjacent parks.

The survey done at Fort Funston in 2000 by Karin Hu, PhD is attached for reference. (This survey has been submitted in two previous comment periods ' during the 12 acre closure comment in 2000 and during the ANPR comment in 2002).

Impact on bank swallows from dogs Appendix C "Bank Swallows" (C-19)
P1265 P1266 P1267 P1268

The document contains numerous references to the possibility of a negative impact by dogs to bank swallows. There is no documentation that negative impacts have actually occurred and some of the possible impacts are physically impossible (unless dogs learn to scale vertical cliffs, it is unlikely

a dog will ever disturb a bank swallow burrow). The document moves from "could" have a negative impact, to taking measures to prevent the impact (an impact that has never been observed). The bank swallow recovery program mentions many things needed to improve habitat and increase numbers; nowhere in this literature are dogs mentioned as a real or potential problem.

The DEIS also assumes that all impacts by dogs & dog owners are negative. In fact, it was a dog owner who pointed out the problem of visitors climbing the cliffs and disturbing the nests, and this same person alerted Dan Murphy of Golden Gate Audubon Society of the problem. As a result, official Park Service signs were erected to keep people 50' away from the cliffs when the bank swallows are present.

In Barrett A. Garrison's "California Partners in Flight Riparian Bird Conservation Plan" he states:

Bank Swallows appear relatively insensitive to moderate levels of human-induced disturbance. In California, colonies occur on banks under actively farmed irrigated row crops and orchards. Several colonies occur in coastal locations at public seashores where human activity can be substantial. (Emphasis added)

and,

A wide variety of land uses occur around Bank Swallow colonies including hydroelectric power generation, irrigation water conveyance, recreational boating, commercial agriculture, vehicular and pedestrian traffic, and domestic livestock grazing. These land uses appear relatively benign as long as the integrity of the nesting bank remains. (Emphasis added)

(Barrett Garrison is a world-renowned bank swallow (*Riparia riparia*) expert and is listed as a reference in the DEIS bibliography.)

Given that there is no observed or measured evidence in the DEIS that dogs harm bank swallows or bank swallow habitat, it is unnecessary to mitigate this in the proposed alternative. Sadly, we've observed Ravens, Kestrels and hawks feasting on the bank swallow colony, especially when the youngsters are taking their first flights. This is also the only documented "take" by Bank Swallow observers (Golden Gate Audubon Society).

(It is more likely that having dogs in the cliff areas kept these predators away in the past than it is that dogs scale the cliff face to harm the birds.)

On page 1265, the DEIS refers to Bank Swallow colony impacts due to cliff rescues of dogs. Again, this is a hypothetical impact. The majority of dog rescues occurs some distance from the Bank Swallow colony and could have

no impact. This is another situation where something that is hypothetically possible becomes something that has to be mitigated. Because Alternative A is the current state, it is not necessary to include hypothetical impacts in the impact analysis; measure what is actually occurring under this management plan.

Impact on Lessingia recovery

P1302

As described in the "Preferred Alternative" section of this comment, off-leash or leashed dog access to the coastal dune habitat is essentially non-existent. Due to the fencing & vegetative barriers, dogs & their owners rarely enter this habitat. (In truth, if there were already a "no-dog" rule in this habitat and if the measure of success was greater than 75% compliance, these areas would be considered a success.

The DEIS is incorrect in stating that Alternative A would possibly result in continued long-term impacts to the San Francisco Lessingia (which does not actually exist at Fort Funston in any case). It is expected that the Park Service will continue to build vegetative barriers to keep all active recreation out of areas deemed to be "sensitive". We've seen that these barriers are very effective, and there is every reason to believe that they will continue to be effective.

Because Alternative A is the current state, it is not necessary to include hypothetical impacts in the impact analysis; measure what is actually occurring under this management plan.

Preferred alternative:

We believe that a successful dog management plan is one that allows the greatest variety of experiences at an area, without undue harm to cultural or natural resources. If the dog management plan is perceived to be unfair to dog walkers, or perceived to do harm to the environment, it will not be accepted by park users or manageable by the GGNRA.

From the beginning of the dog management controversy (at the inception of the GGNRA when off-leash walking was initially banned) and at every meeting with the Park Service (including almost 2 years of negotiated rulemaking), dog owners have tried to make it clear that we want a recreational experience. Dog play areas (small, fenced areas where owners drink coffee while they watch their dogs play) are not what we have asked for. Dog owners are asking for recreational opportunities; places to hike; the opportunity to be in nature ' with their well- behaved dogs. This interest is

100% aligned with the new "Healthy Parks Healthy People US" initiative.

Rather than create rules that seem punitive to the current user-base at Fort Funston, the Park Service has other options that can achieve ' and have achieved ' their goals. As an example, if the existing rule was "no dogs" in the bluff areas (all of the acreage west of the Coast Trail), and the success measure was over 75% compliance, we could mark this as a success right now. Why?

Where post and cable fencing is erected, very few park users or dogs go 10' to 15' beyond the trail edge. Vegetative barriers are even more effective as a barrier to use, and when used in combination with post and cable fencing, almost no people or dogs enter the area.

There are many areas at Fort Funston that are, in effect, "no-dog" areas because of the fencing and vegetative boundaries that have been erected in the last 20 years. Because of this, although the "no action" alternative map shows that almost 100% of Fort Funston is off-leash, the reality of use is quite different.

One of the failures of the DEIS Preferred Alternative for Fort Funston is that it is not based on actual usage or existing conditions. The assessment of impact appears to be based on what might happen if off-leash areas are not restricted further. The missed opportunity for the GGNRA and for those of us who would like to propose a realistic alternative based on impacts ' is that we don't have to imagine what the impact of Alternative A would be. You could have measured what it is, and modifications to the current plan would then be based on improving this baseline.

Another failure is that the Preferred Alternative does not appear to have been created by someone who understands the climate & visitor experiences at Fort Funston. For example, the ROLA proposed in the preferred alternative C is the coldest, windiest and least desirable part of Fort Funston. It is nicknamed "the tundra" because even when the sun is out, this part of the Fort can be freezing and people move through it as quickly as possible. It is also adjacent to the Sunset Trail which is often used by visitors without dogs who want to take a leisurely stroll along the cliffs. One of the advantages of Fort Funston is its size and the dispersion of off-leash activity. If all the off-leash dogs were concentrated in a small area, adjacent to a popular visitor trail, the potential for conflict increases dramatically.

Recommendations:

The first set of recommendations is not specific to Fort Funston:

? Use recreational "best practices" rather than rules to control user behavior.

For example, install post and cable fencing and / or vegetative barriers where the Park Service wants to discourage off-leash activity. ? Require all dog walkers to carry a leash and a bag for each dog. (This insures that they have the means to control and clean up after their dogs.) ? Require that all dogs are licensed. (This creates outreach opportunities for local agencies to offer more training or to create an off-leash "tag" program). ? Work with local non-profit or governmental agencies to create education & outreach programs to define & train on "voice control" standards. ? Rigorously enforce existing regulations regarding resource impacts ' dogs digging, dogs chasing wildlife, owners not cleaning up after their dogs. ? Create a recreational committee made up of governmental agencies and/or local non,profits that can provide a buffer for the GGNRA in dealing with recreational & resource issues, and that can provide guidance to the GGNRA on implementing changes in the best interest of all GGNRA users and values.

Recommendations specific to Fort Funston:

? Move the water fountain currently adjacent to the hang glider launching pad over to the Sunset Trail head. The water fountain attracts many dogs and creates potential conflicts with the hang gliders. ? Install signage (describing the danger), low fencing and/ or vegetative barriers along the cliffs where most of the dog / owner rescues occur. Survey of Fort Funston Recreational Use

Karin Hu, Ph.D., September 2000

Introduction

Fort Funston is a part of the Golden Gate National Recreation Area located in San Francisco. The National Park Service indicates that Fort Funston is used extensively by "beachcombers, walkers, hang gliders, paragliders and horseback riders, and other recreational users," with approximately 750,000 visitors annually {1}. This study examines the recreational use of Fort Funston.

Abstract

During August 2000, recreational use of Fort Funston was measured. Twenty observation periods, lasting 45-55 minutes each, were completed on weekdays and weekends between 8:00 a.m. and 6:00 p.m. A total of 1629 adult recreational users was counted, averaging 81 recreational users per observation period. The results showed that an average of 87 percent of the parties of recreational users was accompanied by a dog.

Several directions for future studies are discussed below, including

examining whether the presence of dogs increases park safety; accessibility for disabled and senior park users; recreational use during winter months; and the need for more off-leash GGNRA areas to prevent overcrowding. Fort Funston currently accommodates more than 5 percent of GGNRA visitors, but comprises less than 0.3 percent of GGNRA acreage.

Method

During the month of August 2000, twenty observation periods were completed. The researchers traveled a circuit that began in the parking lot, followed the Wood Chip trail to the north end of the paved Coastal Trail, and returned via the Sunset Trail to the viewing platform, hang gliders launch area, and parking lot. The researchers counted every park user observed from these areas. Recreational users were tabulated individually and in parties. If two or more recreational users appeared to have arrived in one car, they were considered to be one party, e.g., a woman and man with two children would be one party. The samples were taken between August 1-August 31, included each day of the week at least twice, and each hour from 8:00 a.m. to 6:00 p.m. at least once. The duration of each observation period was approximately 45.55 minutes.

Results

A total of 1629 adult recreational users were counted, comprising an estimated 1175 parties. The average number of recreational users per each observation period was approximately 81, ranging from 35 to 211 people. Women comprised 55 percent of the adult users, men 45 percent. The majority of recreational users were walkers who brought one or more dogs to accompany them. The percentage of parties accompanied by a dog averaged 87 percent with a range of 74-96 percent per observation period. If the count was limited to park trails (i.e., all areas north of the parking lot, and excluding the viewing platform, hang gliders launch area, and south fields), the percentage of parties accompanied by a dog increased to 91 percent, with a range from 81-100 percent per observation period.

The remaining recreational users who were not accompanied by a dog were engaged in activities such as hang gliding, playing on the sand dunes, sifting on the benches, walking, jogging, flying model airplanes, kite-flying, sight-seeing, or riding bikes or scooters.

Discussion

The results show that dog walking is an important recreational activity at Fort Funston. These findings are consistent with the survey conducted by the National Park Service (NPS) at Fort Funston in August 1999 (2). In that study, Fort Funston visitors were asked two questions: "A) In your opinion,

what is the special significance of this park (e.g., a unique feature of geology, a particular aspect of history, etc.); and B) Is there anything else you would like to tell us about your visit?" Although "dogs" were not specifically mentioned in the questions, the NPS Survey found that 74 percent of the 118 respondents included "dogs" in their answers, identifying dogs as a special, positive significance at Fort Funston, regardless of whether the respondent was a dog owner. Only 1.6 percent of the respondents had critical comments about unleashed dogs.

This study found that recreational users accompanied by a dog always comprised at least 74 percent of the park visitors. This may be due to for several reasons: (1) Fort Funston offers a recreational space in a densely populated city where an estimated 38 percent of households has a dog, and (2) beginning in 1996, the National Park Service has eliminated recreation with off-leash dogs at Lands End, Fort Miley, Mann Headlands, the Presidio, and parts of Ocean Beach. These closures have led to a high concentration of dog-walkers at Fort Funston.

Why do people visit Fort Funston? Although Fort Funston offers spectacular views, hang-gliding, and native plant volunteer opportunities (on Saturdays), there are few other attractions for visitors, e.g., the weather is often windy, cold and damp, benches and picnic tables are rare, and the bathrooms are lacking in number and cleanliness (at least 10 percent of the respondents in the NPS Survey commented on this).

On the other hand, visitors with dogs are highly motivated to come to Fort Funston, some on a daily basis, regardless of shortcomings, for several reasons: walking with a canine "best friend" increases physical and mental fitness for both the human and dog, a community of other dog walkers offers positive social interactions, the high-density of park users and the presence of dogs offers a level of personal safety, there exists an opportunity to enjoy a spectacular coastal park, and Fort Funston is a clean, safe park, resulting from the efforts of the Park Rangers and other members of the park community.

Although it might seem surprising that the majority of park users at Fort Funston engage in one activity, i.e., walking with a dog, there are comparable majority users in other parks. For example, the Palo Alto Baylands has birders, Edgewood Park has wildflower enthusiasts, Alcatraz Island has sightseers, and the Presidio Golf Course has golfers.

The results of this study suggest several directions for future studies. First, approximately 55 percent of the recreational users were women, most of them were solitary, accompanied only by a dog. Given the perception that a woman going to a park alone puts her personal safety at risk, one might study whether the presence of dogs increases personal safety. Being

accompanied by a dog might offer some protection. In addition, the presence of off-leash dogs, which can play among the shrubs and forests, probably makes a park less attractive to vagrants, sexual predators, drunks, etc. In other GGNRA parks, for example Milagra Ridge or Presidio Hill, there are fewer park users and no off-leash dogs. Would a solitary woman feel safe going to these GGNRA sites?

Second, the NPS should study the demographics of Fort Funston recreational users to see if citizen needs are being addressed. Casual observation indicates that there are a high number of disabled and senior recreational walkers. Is this comparable to what is seen at other GGNRA parks? Is there accessibility for these users at Fort Funston?

A third study might look at park use during the winter months. Dog walking is a year-round activity. People with dogs are seen at Fort Funston even when the weather is cold or rainy. This study was conducted in August, when the climate is mild, families have vacation time, and tourism is high. If extrapolated to an annual figure, the results of this study probably underestimate the percentage of recreational users with a dog. During the cold, damp winter months, perhaps the only visitors to Fort Funston are those with dogs.

Last, a study should look at the feasibility of opening more GGNRA areas to recreational users with off-leash dogs, i.e., making the GGNRA more amenable to the needs of recreational users. Currently Fort Funston accommodates approximately 5.3 percent of GGNRA visitors, but comprises less than 0.3 percent of GGNRA acreage. Although the presence of many park users offers a degree of safety and community, overcrowding could lead to strained resources and increased maintenance costs.

It is hoped that the results of this study will contribute toward building a scientific foundation upon which park policies can be based.

References

1. Proposed Habitat Protection Closure, Fort Funston, Golden Gate National Recreation Area. July 17, 2000
2. [USPROD01339] National Park Service Survey Conducted at Fort Funston in August 1999.
3. National Park Service Website <www.nps.gov/goga/>. Quick facts (14,048,085 GGNRA visitors in 1999, 73,690 acres in GGNRA.) Author Note

Karin Hu, Ph.D., Psychology, Johns Hopkins Univ. 1979 (now at City College of San Francisco, Instructor of Scientific Methods in Behavioral Sciences). I would like to thank Keith McAllister and Robin Buckley for their help in data collection. Correspondence concerning this study should

be sent to Karin Hu, SF, CA 94112.

Correspondence ID: 4671 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: To: Frank Dean

Superintendent, Golden Gate National Recreation Area

MAY 27, 2011

Enclosed please find two recent Letters to the Editor, both published letters in Marin periodicals.

1.) "Dogs are healthful Too" Marin Independent Journal4j16j2011 2.) "Dogs and Recreation" Marin Magazine, April 2011

Please include both letters to the Editor and this cover letter as Comment Submissions for the DEIS Dog Management Plan.

1. The National Park Service Director, Jon Jarvis, came to Marin recently to unveil a new agenda calling for open space to help nurture the nation's physical and mental health. Mr. Jarvis has made his bias against dogs now well-known in our Park while on a radio show in SF.

2. An article in Marin Magazine in response to an environmentalist's claim that Dog's do harm to the GGNRA.

I should have also mentioned in my response to Marin Magazine that no scientific study has been performed by the NPS to prove that humans with their dog companions do anymore harm to our Parks than any other recreational user group.

In addition I am a dues paying member of:

Marin Audubon The Sierra Club Natural Resources Defense Council Marin Agricultural Land Trust MarinWatch

I strongly urge the GGNRA to change their public opinion wherein the NPS in The Draft EIS treats the environment and recreation as having opposing values.

Respectfully Submitted,

Jane Woodman

Sausalito, Ca 94965

Opinion, Marin Independent Journal Saturday April 16, 2011

RECREATION,

Dogs are healthful, too

On the front page of the IJ, Jon Jarvis, National Park Service Director announced: "I have come to Marin to push a new agenda calling for open space to help nurture the nation's physical and mental health along with 100 professionals all meeting to discuss ways to promote healthier lifestyles and help lower health care costs by tapping open space an elixir. Personal access to the natural world plays a vital role in our physical and emotional well-being."

Two years ago, then-House Majority Leader Nancy Pelosi sponsored a bill to remove the word "recreation" from the Golden Gate National Recreation Area.

The legislation that created the park, obviously called for recreation. A coalition of GGNRA users offered strong public opposition to the bill and it died.

Drastic changes are now proposed for GGNRA's 1979 pet policy.

The park service proposed to severely limit the park areas (now 1 percent) in the 75,000 acres of the GGNRA for walking dogs on- and off-leash dog.

Our dogs get us out for hikes, trail and beach walks -- and keep us healthy.

Director Jarvis says there are even proven medical studies that show it is healthy to get out in our park.

Just so I get this right: The park service is unveiling this "health initiative" at the exact same time it is pursuing severe limitations to the areas for hiking and walking with one's dog companions.

I'm confused.

Jane Woodman, SAUSALITO, REPRESENTATIVE OF ECO-DOG.ORG

Marin Magazine, April 2011

Dogs and recreation You might have made note at the beginning of "Treasure Hunt" by Eve Pell (March 2011) that the article was timed with the current efforts of the Golden Gate National Recreational Area (GGNRA) to drastically change the 1979 Pet Policy.

In fact, the National Park Service would make it a federal crime to walk your companion dogs on- or off-leash in the 1 percent of the thousands of acreage now allowed by the current law. However, the enabling legislation that created the GGNRA specified that along with the protection of wildlife and plant species, the roads and trails and beaches were meant to be shared by all recreational users.

Dog owners have not demonstrated for more areas in which to walk our dogs, only for what we have enjoyed historically (even though the populations of both humans and dogs have notably increased since 1979). In fact, north from the Golden Gate Bridge to the Sonoma County border, no dogs are allowed on the publicly owned beaches with the exception of Rodeo and Muir Beach currently allowing for dogs off leash. In the GGNRA-proposed plan, Muir Beach will ban all dogs - thus leaving a portion of Rodeo Beach for off-leash walking in all of Marin County.

There are few trails and fire roads in the Marin Headlands currently where it is legal to hike with dogs, and the intent of the GGNRA is to now abolish those as well. Mount Tamalpias is state owned and allows no dogs on any trail except on the Old Stage Coach Road for a short .5- to .75-mile on-leash walk to connect with the Marin Municipal Water District Fire Road, where dogs are allowable on-leash only.

The article portrayed dogs as the bad guys in the environmental discussion; however, the science does not prove that dogs have damaged the 1 percent they have had access to for those 34 years. Responsible dog owners not only pick up after themselves and their dogs but also remove debris left behind by walkers, runners and bike riders.

Correspondence ID: 4672 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Introduction

The legacy of Golden Gate National Recreation Area (GGNRA) management is one of duplicity, broken promises, and broken laws. This DEIS as a means to modify recreational usage is no exception. This DEIS is not a good faith effort by the NPSjGGNRA to resolve conflict, but a thinly veiled ploy to eliminate off-leash recreation from the GGNRA entirely. The

conflict is actually one of legislative intent: the GGNRAjNPS desire to manage this Golden Gate National Recreation Area as a National Park, while the enabling legislation and the will of the people assert the management should reflect the unique requirement we have for recreational access (as mandated by Congress) here in the GGNRA.

With respect to this 2400 page DEIS, the Federal Register states: "This plan will promote the following objectives: preserve and protect natural and cultural resources and natural processes, provide a variety of visitor experiences, improve visitor and employee safety, reduce user conflicts, and maintain GGNRA resources and values for future generations." There is no mention of recreation or its value in this Recreation Area. With the addition of a "Compliance-based Management Strategy" the GGNRA has cleared the way to incrementally eliminate the presence of dogs in the GGNRA.

This is a long-standing battle we have waged; the GGNRA takes away recreational access, and the citizens turn to the Federal Court to have access reinstated. It has been a colossal waste of time and money, and a hardship for the citizens because not only are we battling for our right to access; we are also paying for both sides of the debate. I intend to review the objectives and content of this DEIS and the history of the management of the GGNRA. At its conclusion I think you will agree there are only three possible resolutions to this situation. San Francisco City and County will be required to formally take back those properties they can, or Congress will be required to implement a Section Seven Special Regulation (over the objections of DOIjNPSjGGNRA) to ensure recreational access as was originally intended when this National Recreation Area was created. The third option would be to transfer the GGNRA to another Federal agency such as the Forest Service, where sound principles of land use and planning are actually implemented as a part of their management policy. Should these properties remain under the management of NPSjGGNRA, there must be strict oversight by Congress to ensure sound principles of land use planning and management are implemented permanently as they have not been implemented up until now.

This Agency Action Is Unlawful

Before examining the contents of this DEIS, I must make the fundamental point that the decision to proceed with this DEIS itself is unlawful. The enabling legislation requires the GGNRA to utilize sound principles of land use planning and management. Accepted practice would be illustrated by the Rattlesnake National Recreation Area and Wilderness (RNRA W) which produces an annual monitoring report. The report assesses current recreation trends, needs, and impacts, and thereby serves as a tool for long-term management of the RNRAW. The following is taken from the Introduction of the Report for 2009:

"This is the seventeenth annual monitoring report for the Limits of Acceptable Change (LAC) based Management Direction for the Rattlesnake National Recreation Area (NRA) and Wilderness (RNRA W), which was approved in December 1992. Monitoring is the final step in the LAC planning system. It is an ongoing, continuous process and is instrumental for evaluating management effectiveness and sustainability of resource values and conditions.

The LAC process recognizes that wilderness conditions change. Wilderness areas are dynamic systems with many forces continually affecting the landscape. These forces of change include people and their impacts, fire, insects and disease, invasive species and many others. It defines what conditions are desirable and how to achieve or maintain those conditions. Based on citizen involvement, laws and regulation, it identifies what changes are acceptable rather than attempting to prevent change.

Monitoring is based upon the indicators and standards outlined in the LAC direction. The indicators and their specific standards provide methods of measurement to effectively monitor factors and area wide issues. Refer to the December, 1992 Limits of Acceptable Change Based Management Direction for the RNRA W for a more complete discussion of the LAC process.

The factors monitored during the 2009 field season include: education, use and users, trails and roads, Wilderness characteristics, vegetation, vandalism, wildlife, fire, goals and policies. Refer to Table 1 for a complete description of the factors, indicators and standards for each opportunity class (OC)."

In contrast, in 2006 when this DEIS was announced on the Federal Register, I made a Freedom of Information Act Request to provide the data, documents, and/or Staff Report which substantiated the GGNRA's claim that there was controversy over the dog policy, compromised visitor and employee safety and resource degradation which warranted this DEIS. The GGNRA's response merely stated: "The Staff Report and other documents you seek do not exist at this time". An appeal to the Department of the Interior regarding this FOIA request elicited the following response after several letters: "Since the Department has not made a determination on your appeal within the time limits set in the FOIA, you may seek judicial review under 5 U.S.C. 552(a)(4)(B). However, we hope that you will delay filing the lawsuit so that the Department can thoroughly review the issues in your appeal and make a determination. We appreciate your patience to this point and the Department will make every effort to reach a decision on your appeal as soon as possible." This letter is dated August 8, 2006. There has been no written response as of yet.

The lack of data or any documentation to support the assertions used as

justification to proceed with this Environmental Review violates Federal Law as it renders this agency action arbitrary, capricious and an abuse of discretion. Accordingly, this agency action, findings and conclusions should be set aside as prescribed by the Administrative Procedure Act, 5 U.S.C. 706 (2)A.

Why is it significant that other Recreation Areas perform annual monitoring of resources and the GGNRA does not? Why is monitoring so important? As stated in an NPS publication, "Monitoring the Condition of Natural Resources in US National Parks" ([http://science.nature.nps.govlim/monitor/docs/Monitoring Park Condition. pdf](http://science.nature.nps.govlim/monitor/docs/Monitoring_Park_Condition.pdf)) the purpose of monitoring is as follows:

The overall purpose of natural resource monitoring in parks is to develop scientifically sound information on the current status and long term trends in the composition, structure, and function of park ecosystems, and to determine how well current management practices are sustaining those ecosystems. Use of monitoring information will increase confidence in manager's decisions and improve their ability to manage park resources, and will allow managers to confront and mitigate threats to the park and operate more effectively in legal and political arenas.

Additionally, a review of NPS online resources reveals that there is an entire infrastructure set up to guide and facilitate NPS properties in their monitoring duties, "Vital Signs Monitoring" (<http://science.nature.nps.govlim/monitorindex.cfm>)

A subsection of the aforementioned web site (Program Goals) discusses the goals of park monitoring: "Natural resource monitoring provides site-specific information needed to understand and identify change in complex, variable, and imperfectly understood natural systems and to determine whether observed changes are within natural levels of variability or may be indicators of unwanted human influences. Thus, monitoring provides a basis for understanding and identifying meaningful change in natural systems characterized by complexity, variability, and surprises. Monitoring data help to define the normal limits of natural variation in park resources and provide a basis for understanding observed changes; monitoring results may also be used to determine what constitutes impairment and to identify the need to initiate or change management practices."

As discussed above, it seems impossible that GGNRA management would undertake a management change as proposed in this DEIS without any evidence of monitoring as a means to identify the alleged impairment. Further exploration of the NPS "Vital Signs Monitoring" Resources Online (see <http://science.nature.nps.govlim/monitor/ProgramGoals.cfm>) reveals:

National Park managers are directed by federal law and National Park Service policies and guidance to know the status and trends in the condition of natural resources under their stewardship in order to fulfill the NPS mission of conserving parks unimpaired (see Summary of Laws, Policies, and Guidance).

More recently, the National Parks Omnibus Management Act of 1998 established the framework for fully integrating natural resource monitoring and other science activities into the management processes of the National Park System. The Act charges the Secretary of the Interior to "continually improve the ability of the National Park Service to provide state-of-the-art management, protection, and interpretation of and research on the resources of the National Park System", and to "assure the full and proper utilization of the results of scientific studies for park management decisions." Section 5934 of the Act requires the Secretary of the Interior to develop a program of "inventory and monitoring of National Park System resources to establish baseline information and to provide information on the long-term trends in the condition of National Park System resources. "

Clearly, the failure of GGNRA management to conduct any consistent monitoring of the resources of the GGNRA is a violation of Federal law. The more fundamental problem is that this DEIS highlights the fact that GGNRA management is in persistent violation of the enabling legislation for this park property. GGNRA management can provide no monitoring report to substantiate visitor use patterns or conflicts, no documentation of degradation of the Recreation Area resources, as well as no documentation as to whether resource degradation is inevitable or under the control of management prior to proposing these management changes. Consequently, there have been no mitigations to address problems as they arise. In truth, were the GGNRA's claims of degradation of resources even valid (I contend they are not), a case could be made that any degradation of the GGNRA property is due to GGNRA management's failure to adhere to accepted practice regarding land use planning and management. How is it equitable for the GGNRA to abolish recreational access as a remedy to a problem they cannot document and when they have demonstrably violated the principles of sound land use planning and management?

The fact is the National Park Service has had a shift in ideology, and this new ideology is in direct conflict with the promises the NPS made to citizens to persuade them and their governing bodies to turn over the properties that make up the GGNRA. Had the GGNRA monitored this property conscientiously, their findings would not have justified initiating this DEIS in the first place.

This Agency's Management Is The Source Of Controversy And Conflict

It is the GGNRA's refusal to abide by the enabling legislation for this park that has created controversy and user conflict. I am obligated to go through a chronological history of the GGNRA because the history provided in this DEIS is inaccurate in many respects.

History

The historical backdrop presented in this DEIS could be politely classified as "revisionist". A more accurate description is as follows:

In March 1963, the President's Recreational Advisory Council released "Policy Circular No. 1." In it, the council laid out a new outdoor recreation policy for all agencies, with the key stipulation that all National Recreation sites be accessible at all times for "all-purpose recreational use." To make the point even clearer, it asserted that agency management of National Recreation Areas should be more responsive to recreational demands than to other such considerations as "preserving unique natural or historical resources." (Administrative History of Point Reyes National Seashore) The NPS was left with little choice but to heed these stipulations.

In response, the NPS advisory board decided to create three separate operating units and management goals for traditional NPS natural or Wilderness areas, Historical Monuments, and for the broad category of Recreation Areas. Secretary of the Interior Udall made official the new categories in his July 10, 1964, memorandum to new NPS director George B. Hartzog, Jr. Udall outlined the prescribed management policies for the recreational area category: "Outdoor recreation shall be recognized as the dominant or primary resource management objective." Resource use would emphasize "active participation in outdoor recreation in a pleasing environment." (Administrative History of Point Reyes National Seashore)

In 1970 Secretary of Interior Walter Hickel moved to create the GGNRA "to bring parks to the people", (U.S. Department of Interior News Release, September 14, 1970.) Congress established the GGNRA on October 27, 1972, stating:

"In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the recreation area, the Secretary of the Interior (hereinafter referred to as the "Secretary") shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this

subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area ... " (16 U.S.C. Sec. 460bb.)

In addition to a generic statement of purpose as appears in most national park statutes, it is important to note that Congress included two "specific provisions" unique to the GGNRA.

First, the park was established "to provide for the maintenance of needed recreational open space necessary to urban environment and planning."

Second, the GGNRA statute imposes a unique limitation on NPS's discretionary power for "management of the recreation area" by providing that the "Secretary of Interior...shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. "

While composing a list of enumerated recreational activities contemplated for the new urban park would be virtually impossible, legislative history reveals what Congress meant by "needed recreational open space necessary to urban environment." "It is a well-recognized principle of statutory construction that contemporaneous interpretations of dated legislation are ordinarily given considerable deference when its meaning is later questioned." (National Rifle Association of America v. Potter 628 F. Supp. 903, 911 (D.C. Dist. Col. 1986).) In addition to sun bathing, picnicking, horse riding, swimming, hiking, and fishing, off-leash dog walking was specifically addressed during Congressional hearings. For example, a letter by a seven year old child from San Francisco petitioned the Chairman for a dog park where she could play and socialize her dog: "Dear Congressman Roy Taylor: I want a park so I can play in the park and my sister wants a park too and so my dog can play with another dogs and my Mom wants a park so she could take my dog out to play. I hope you will make a park. Elizabeth Linke." (Hearings Before the Subcommittee on Interior and Insular Affairs, House of Representatives, p. 414.)

Consistent with the trend at the time, Congress explicitly stated the GGNRA was to be a "new national urban recreation area which will concentrate on serving the outdoor recreation needs of the people of the metropolitan region." The GGNRA's mandate was to "expand to the maximum extent possible the outdoor recreation opportunities available in this region." (1-1. R. Rep. No. 1391, 92nd Cong., 2nd Session (1972).)

At the time, all municipal beaches and adjacent city parks considered for inclusion in the park were dedicated to off-leash recreation. (It has been the law of the State of California since its inception in 1850 that the State holds

the tidelands in trust for its citizens. In decisions from both the United States and California Supreme Courts, the uses encompassed by the public trust doctrine have been held to include "general recreational" activities.)

When voting for Charter Section 7.403-1(a) authorizing the transfer of the City parks, the citizens of San Francisco were told that "the transfer of these lands is a technical resolution allowing the City and County of San Francisco to transfer city lands to the Golden Gate National Recreation area ... a national urban park established in 1972 by Congress to preserve 34,000 acres of land and water in San Francisco and Marin for recreational use by all citizens." The first GGNRA Superintendent William J. Whalen made specific promises to San Francisco voters that the new NRA would retain historical recreational access (including off-leash recreation) should they vote to include SF park properties in the GGNRA.

Although the city was interested in having its parks included in the new urban park, it wanted to retain jurisdiction over them; surrendering total control to the federal government was not part of the original deal. San Francisco Mayor Joseph Alioto told the United States House Hearings that the city parks proposed for inclusion in the GGNRA "should remain under the jurisdiction of the San Francisco Recreation and Park Commission" (April 6, 1972). The Department of Interior clearly understood that the "taxpayers of San Francisco had the foresight to preserve these recreational areas and the willingness to pay for their support" and "naturally wish to retain some voice in their operations and administration consistent again with an overall master plan." (February 14, 1972). The San Francisco Recreation and Park Commission adopted Resolution No. 9030 which provides, "[t]hat this Commission, believing that inclusion of these properties is vital to the success of the concept of bringing parks to the people, recommends that they remain under the jurisdiction of the Recreation and Park Commission of the City and County of San Francisco." (May 30, 1972).

Aware that certain unique restrictions were included in the enabling statute requiring the NPS to maintain "recreational open space necessary for urban environment and planning", San Francisco adopted the "technical resolution" authorizing the transfer of City parks for "recreational use by all citizens."

The Board of Supervisors adopted Resolution No. 364-72, which provides:

1. "the City and County of San Francisco desires to maintain and improve the recreation facilities available to the residents of San Francisco on the aforementioned property owned by the City and County of San Francisco located within the Golden Gate National Recreation Area;"
2. "The City and County of San Francisco desires to participate in the

planning, administration and operation of the Golden Gate National Recreation Area;" and

3. "this Board of Supervisors endorse a policy of cooperation and administration and management of the Golden Gate National Recreation Area including the property owned by the City and County of San Francisco located within the Recreation Area. (June 9, 1972)".

Before the transfer occurred, an Agreement/ Memorandum of Understanding (MOU) between San Francisco and the Federal Government gave the City Planning Department jurisdiction to review NPS plans within formally owned City lands after their incorporation into the GGNRA. Department of City Planning memos from the 1970s confirm that the MOU requires that all NPS proposals be submitted to the Department for review.

As minutes of the San Francisco City Planning Commission, dated December 5, 1974 confirm, the resolution to transfer the property was approved on that day because the Commission was told: "the deed transferring jurisdiction over the parcel to the Federal Government would specify that the property should be used for Open Space and Recreational purposes only."

Even as the properties were being secured, the National Park Service was moving in the direction of abolishing the National Recreation, Historical Monuments, and Wilderness Management categories. The General Authorities Act of 1970 began the legal unraveling of the three management categories. Officials in Washington assured field operations that these changes were administrative and "not intended to create significant changes in the management of parks." (Administrative History of Point Reyes National Seashore)

But in reality, the move was being made to reverse the priority of recreation. We shall now track the progression of this move to place "preservation/restoration" over recreation.

Considering his representations to SF voters and elected officials, it seems duplicitous at best that in 1977 the same William J. Whalen (recently promoted to Director status in the NPS) officially dismantled the three-category distinctions which provided different management for National Recreation Area category properties (which included the GGNRA). To answer the obvious question as to how the priority of recreation was still to be honored, it was said the promulgation of new regulations were developed to reflect "the actual Management practices which have become established in park areas, either through legislative requirements or policy decision." (Memo from Associate Director, Management and Operations to Directorate and Field Directorate, 12/22/77).

Congress bolstered NPS Director Whalen's decision to further de-emphasize the Recreational preference in the Redwoods Act of 1978, which included an amendment to the 1970 General Authorities Act declaring the "regulation of the various areas of the National Park System, ... shall be consistent with and founded in the purpose established by the [Organic Act] to the common benefit of all the people of the United States." (Administrative History of Point Reyes National Seashore)

Acting on the promise to the city and the mandate to manage park resources "consistent with sound principles of land use planning and management" for the "maintenance of needed recreational open space necessary to urban environment and planning", NPS developed the 1979 Pet Policy through the auspices of the Citizens Advisory Commission which designated certain areas for voice control in San Francisco and Marin counties. The development of this policy was initiated "because the ordinary guidelines outlined in the Code of Federal Regulations do not really apply in an urban area. People and their animals have been visiting the park for too long to apply an all-inclusive arbitrary policy."

Documents relating to development of the policy leave no question that NPS and not the Citizens Advisory Commission developed the off-leash policy for GGNRA. In October, 1977, Rolf Diamont, GGNRA "Environmental Coordinator" prepared a memo proposing a "Draft Dog Policy for San Francisco Unit." His memo enumerated the following guidelines:

- 1 "No regulation, verbal or written, should be attempted that cannot be reasonably and consistently administered."
- 2 "Dog regulations should be different for different areas of the park reflecting public needs and attitudes as well as urban geography and our capabilities."
- 3 "When we discourage or restrict dogs in any area, whenever possible, an alternative site where dogs are allowed should be suggested."

Each precept is consistent with "sound principles of land use management". To facilitate public review of the proposed policy, the Citizens Advisory Commission established a Pet Policy Committee to conduct hearings on the proposed policy. A briefing memo for the record prepared by the Staff Assistant to General Superintendent dated April 3, 1978 acknowledged that 36 CFR 2.8 leash law was "applicable to all properties of GGNRA". NPS realized a special regulation would have to be prepared. "A deviation from this regulation will require the writing of a special regulation specific to GGNRA". The leash law was not enforced while the new policy was being developed: "Enforcement of the CFR has been non-existent until a dog policy

and possibly a special regulation is established. "

The 1979 Pet Policy was established as the official off-leash recreation policy for the GGNRA as required by the enabling statute and the promise made to the city. NPS issued press releases of the official off-leash policy (Lynn Thompson memo to Coalition For San Francisco Neighborhoods, 10/17/78). Again, NPS told San Francisco this policy was developed because the "[e]xisting federal regulations' were not "a viable situation in an urban area".

By summer of 1979, GGNRA had initiated the process to bring federal regulations into compliance with the enabling legislation and the off-leash policy. A draft special regulation 7.97(b) was submitted to the Western Regional Director NPS for approval. Department of Interior Solicitor Ralph Mihan reviewed the draft proposed regulation and found "the proposed regulation to be legally acceptable", but advised the formal request should include a "authorship statement or a statement of significance" which "must be included within the rulemaking package before its transmittal to Washington." (Ralph Mihan, Solicitor to Western Regional Director, Re: Proposed Rulemaking Golden Gate National Recreation Area (Pets), 7/23/79). The draft proposed regulation in fact contained a statement of significance, the Section Seven Amendment was being proposed "because large portions of land formerly used as pet exercise areas have been included with Golden Gate National Recreation Area." (1/9/80 Regional Director memo to Superintendent GGNRA: Re: Proposed Special Regulation -Pets USPRODo0386-8). The proposed regulation also called for public comment "within 30 days of the publication of this notice in the Federal Register."

Although this 1979 Pet Policy was consistent with the statutory mandate for the GGNRA to provide "needed recreational open space necessary for urban environment" and required by the promise made to San Francisco when city property was donated to the park, officials in Washington D.C did not finalize the Section Seven Special Regulation to bring their regulations into compliance with the enabling statute. Subsequently the 1979 Pet Policy guidelines were incorporated into the 1982 Natural Resources Management Plan as Appendix C. The duplicity lay in the GGNRA's intentional failure to designate the 1979 Pet Policy as a Section Seven Special Regulation-the type of regulation referred to in the Memo dated 12/22/77 referenced above. The significance of this will be apparent in 2001.

Finally, Director William J. Whalen's 1980 NPS Management Policies produced a systemwide change in overall policy and management. The clear directive was preservation first, recreation second."(Administrative History of Point Reyes National Seashore)

If you look at some of the GGNRA's management activities, you have cause

to wonder if the GGNRA really wants us in "their park". For example, in 1989 the GGNRA, under the supervision of Brian O'Neill, signed on to a biosphere habitat program entitled "Man and Biosphere Habitat Programme" ("MAE" or "MAP"). One would be hard pressed to find a philosophy in greater conflict with the recreational priority of the GGNRA than that of Peter Bridgewater, Secretary of the MAB/MAP Programme, who has said, "Earth would be a better place if we had no people." The year of 1989, when the Biosphere program began, saw visitors drop by over 5 million in this Recreation Area that otherwise had shown steady growth in recreation visitors since they started tracking visitors in 1973.

In 1992 Bill Clinton's newly appointed Secretary of the Interior, Bruce Babitt, had a different vision for the National Parks System. A new anti-recreation ideology pervaded Park Service policy. Despite the legislative mandate that sound land use principles be applied "to maintain needed recreational open space necessary for urban environment", NPS summarily closed off in August of 1996:

? over 15 miles off-leash recreational space in San Francisco ? 11 miles of trail in Presidio ? 2.2 miles at Ocean Beach ? Lands End ? Fort Miley

The aforementioned Diamont memo confirms that all closures affected areas used for this recreational activity before the park was established: Ocean Beach, Fort Funston, Sutro Heights Park, Phelan Beach, Lands End, and Baker Beach. Diamont's comments concerning Ocean Beach explain why that closure has been unsuccessful:

"Ocean Beach: no rules should be enforced here. Ocean Beach is too large and too accessible to control dogs. It would be a logistical nightmare for the Park Service to try. Also lifestyles are such on Ocean Beach, that an inflexible NPS here could hurt our improving relations with visitors."

The DEIS states: "Since the 1990S, the San Francisco Bay Area population and overall use of GGNRA park sites have increased, as have the number of private and commercial dog walkers. At the same time, the number of conflicts between park users with and without dogs began to rise, as did the fear of dogs and dog bites or attacks."

With respect to the claim in the DEIS that use of the Recreation Area had increased, two points can be made. First, increased usage over time was anticipated when this National Recreation Area was created. The House Report No 92-1391 made clear that the GGNRA would be confronted with problems in San Francisco that would require careful planning because of the high volume year-round visitation:

"As a national urban recreation area, this new component of the national park

system will be confronted with problems which do not frequently occur at other national park and recreation areas. Great numbers of people can be expected to use the area-particularly those portions located in San Francisco County." (pg. 11)

There is no surprise here. Therefore, abandonment of the principles outlined in the enabling legislation, in an absence of appropriate monitoring of resources, as proposed in this DEIS is not an acceptable management reaction to increased usage of the GGNRA by citizens.

Second, the number of park visitors has NOT increased dramatically over the past 20 years. In fact, in 1987 the GGNRA experienced its greatest number of visitors, coming in at 21,767,176 recreational visitors. According to NPS statistics, in 2010, the total number of recreational visitors was 14,271,503, down about 34% from 1988.

Consider also that in the past 20 years the GGNRA acreage has almost doubled in size, and expanded into San Mateo County. This puts a far larger population in direct proximity to the Recreation Area, yet the visitor numbers are down dramatically. Users of the GGNRA will tell you that this DEIS is just a reflection of the management priorities that Brian O'Neill started with his Biosphere commitment that have systematically denied and discouraged access for the public to this Golden Gate National Recreation Area.

Evidence the issue was really a new ideology is the fact that the GGNRA experimented with changing its name to Golden Gate National Parks (GGNP) in an effort to convince citizens of the Bay Area that the paramount mission of the NPS is to bring the wilderness to the City. On August 28, 2001, the GGNRA Advisory Commission meeting was opened by Chair Rich Bartke as a regular meeting of the Advisory Commission to the National Parks in the Golden Gate Area. Mr. Bartke was asked to correct that reference by a concerned citizen, Michael Goldstein. Mr. Goldstein stated publicly in his comments to the Commission that this was not the first time he had addressed the Commission on this topic and that this practice of omitting the word "recreation" from the Park's name had become a matter of public concern. This runs counter to the intentions of the City of San Francisco and its citizens who had been promised that the GGNRA will remain an urban recreation area.

The DEIS further states: During this period (2001), it was clarified by the Department of Justice, U.S. Attorney, and the Department of the Interior Solicitor Offices that the voice-control policy then in effect at Fort Funston and other locations in the park was contrary to NPS regulations. In a public meeting in January 2001, the Commission acknowledged that the voice control policy was contrary to 36 CFR 2.1s(a)(2), prohibiting off-leash dogs

in national parks, and therefore illegal and unenforceable.

Now we see the significance of the GGNRA/NPS decision to refrain from making the 1979 Pet Policy a Section Seven Special Regulation. By doing so, they were able to exercise "plausible deniability". In reality, this is just one more example of how the GGNRA has dealt in bad faith with the public whom they, in theory, serve.

The public and elected officials were incensed at the GGNRA change in policy. Indeed, in 2001, a Resolution was approved by the San Francisco Board of Supervisors, detailing the history of the relationship between the City, the public and the GGNRA. The Resolution (and its findings) is so significant that it is quoted in full below:

RESOLUTION for S.F. Board of Supervisors Vote [Urging GGNRA to delay leash enforcement - Passed on December 10, 2001]

Resolution requesting the National Park Service to delay enforcing, in the San Francisco parks situated in the GGNRA, 36 C.F.R. 2.15, requiring pets to be on leash in national parks, until the ANPR process has been completed.

WHEREAS, In 1975, the City and County of San Francisco transferred Fort Funston and other City-owned park lands to the federal government to be included in the Golden Gate National Recreation Area (GGNRA), to be administered by the National Park Service (NPS); and,

WHEREAS, The statute creating the GGNRA (16 U.S.C. Section 460bb) specifically states that the GGNRA was established to provide for the maintenance of needed recreational open space necessary to the urban environment and planning and requires that the Secretary of the Interior "utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management;" and,

WHEREAS, Former Charter section 7.403-1 (a), as approved by the voters, required that the deed transferring any City-owned park lands to the NPS include the restriction that said lands were to be reserved by the Park Service "in perpetuity for recreation or park purposes with a right of reversion upon breach of said restriction;" and,

WHEREAS, When Fort Funston and other City-owned parks were transferred to the federal government, a federal regulation existed requiring all pets to be on leash in federal parks, yet the NPS chose not to enforce this regulation in the San Francisco City parks; and,

WHEREAS, In April 1978, the GGNRA stated its position that "the ordinary

guidelines outlined in the Code of Federal regulations do not really apply in an urban area," and that "people and their animals have been visiting the park for too long to apply an all-inclusive arbitrary policy;" and,

WHEREAS, The Superintendent of the GGNRA in the spirit of this statement developed a draft pet policy and submitted it to the GGNRA Advisory Committee for further review and public hearings; and,

WHEREAS, In September of 1978, after extensive public hearings and public surveys, the Advisory Commission proposed guidelines for a pet policy for the San Francisco Unit of the GGNRA, designating Fort Funston, Lands End, Ocean Beach, Fort Miley, Baker Beach, and Crissy Field for continued off-leash recreation; and,

WHEREAS, On October 6, 1978, GGNRA General Superintendent Lynn Thompson accepted these designations with the following comment: "As you know, the Advisory Commission approved the proposed guidelines for a pet policy in the San Francisco Unit of the GGNRA at their September 27 meeting," and she continued, "We are accepting in total the Commission's recommendations for each of these areas;" and,

WHEREAS, On February 24, 1979, the GGNRA finalized the pet policy for both San Francisco and Marin County, establishing areas where pets could be exercised off-leash; and,

WHEREAS, In 1982, the 1979 Pet Policy was incorporated into the GGNRA Natural Resources Management Plan as Appendix C; and,

WHEREAS, On July 8, 1992, NPS Western Regional Director Stanley Albright assured U.S. Senator John Seymour that "there is no change in the 1979 Pet Policy which provides the visitor of walking one's dog off leash"; and,

WHEREAS, By letter dated July 8, 1992, Western Regional Director Stanley Albright also assured U.S. Senator Cranston that there would be no change in the 1979 Pet Policy; and,

WHEREAS, On February 5, 1999, Pacific Western Regional Director John Reynolds assured U.S. Senator Dianne Feinstein that the "GGNRA has adopted a pet policy that is more liberal than the regulations enforced at other national park sites throughout the United States, where pets are required to be leashed at all times and are, for the most part, excluded from all but developed areas," and the letter continued, "[The] GGNRA " has, with the assistance of the park's Advisory Commission, established a pet policy that allows some opportunity for visitors to enjoy a few designated areas as

voice control areas where pets are allowed off-leash;" and,

WHEREAS, On March 19, 1999, GGNRA Superintendent Brian O'Neill stated to U.S. Congresswoman Nancy Pelosi, the "GGNRA has adopted a pet policy that is more liberal than pet regulations at other national park sites throughout the country ... certain areas of the park have been designated as voice control areas where pets are permitted off-leash;" and,

WHEREAS, In November of 2000, the GGNRA Advisory Committee attempted to revoke the 1979 Pet Policy, but failed due to a point of order; and,

WHEREAS, On January 23, 2001, over 1,500 people attended the GGNRA Advisory Committee meeting to protest revocation of the 1979 Pet Policy, nine San Francisco supervisors spoke, and both Senator Speier and Assemblyman Shelley sent letters to be read by their representatives; and,

WHEREAS, The Advisory Committee recommended that the GGNRA hold meetings with stakeholder groups within the next 120 days to resolve the issue, and to not change leash enforcement for this period; and,

WHEREAS, The Advisory Committee at this meeting did not vote on the Pet Policy; and,

WHEREAS, Rather than hold stakeholder meetings, the GGNRA received permission from Washington for a more formal process called Advance Notice of Proposed Rulemaking (ANPR), but this process has not begun; and,

WHEREAS, In November, 2001, the GGNRA began to aggressively enforce the leash requirement at Fort Funston, sending teams of law enforcement rangers for 2 to 3 hour segments, and issuing tickets for walking dogs off-leash without initiating the ANPR process in good faith with the public; and,

WHEREAS, Off-leash recreational users believe that off-leash recreation is legal at Fort Funston, and they agreed to go through the ANPR process and further rulemaking in order to obtain a special rule for the GGNRA that specifically recognizes that off-leash dog-walking is permissible in certain GGNRA parks; and,

WHEREAS, The Board of Supervisors of the City and County of San Francisco finds that the recent enforcement of 36 C.F.R. 2.15 is in contravention to the representations made to the public at the Citizens Advisory Committee meeting on January 23, 2001; now, therefore, be it

RESOLVED, That the Board of Supervisors of the City and County of San

Francisco hereby requests the National Park Service not to enforce, in the GGNRA parks which were donated to the federal government by the City and County of San Francisco, 36 C.F.R. 2.15, which requires that all pets be on leash in federal parks, until the ANPR process has been satisfactorily completed; and, be it

FURTHER RESOLVED, That the Board of Supervisors of the City and County of San Francisco hereby requests the NPS to advise the Board as to the status of the ANPR process; and, be it

FURTHER RESOLVED, That the Clerk of the Board of Supervisors shall send copies of this resolution to the offices of United States Senator Dianne Feinstein, United States Senator Barbara Boxer, Congresswoman Nancy Pelosi, Congressman Tom Lantos, State Senator John Burton, State Senator Jackie Speier, Assemblywoman Carole Migden, Assemblyman Kevin Shelley, GGNRA Superintendent Brian O'Neill and the National Park Service.

Unfortunately, the GGNRA ignored the Resolution, and in 2002 instituted a ban on off-leash recreation and began ticketing dog guardians for recreating with their dogs off-leash. As mentioned in the Resolution, pressure from the City of San Francisco to take back the management of these properties in the courts, as well as the Federal court confirming other violations of law the GGNRA had been guilty of, caused the GGNRA to invite the public to petition the Federal government for the ability to create a Section Seven Special Regulation for off-leash recreation in the GGNRA (ANPR).

The public submitted thousands upon thousands of requests to the Federal government, and a Federal Panel reviewed the history and legal agreements for the GGNRA. The Federal Panel that reviewed the applicable authorities, policies, planning guidelines, and information on Park setting, natural and cultural resources, and public safety developed the following observation (among others):

"GGNRA parkland is immediately adjacent to San Francisco, one of the most densely populated urban centers in the United States of America, and manages a significant portion of recreational open space in the city. Most residents do not have 'backyards' or access to private open space to exercise their pets off-leash. Residents rely on the close proximity of GGNRA open space for this purpose." (ANPR Decision Documents; Federal Panel Recommendations, supra, Section 3, emphasis added.)

"... [the GGNRA should] clearly distinguish between on-leash, off-leash, and no pet areas to avoid management and public confusion." (Federal Panel Recommendation to the General Superintendent on Proposed Rulemaking for Pet Management at Golden Gate National Recreation Area, Section 4

("Federal Panel Recommendations"). p. 11 (Revised November 7, 2002).
[See
[http://www.nps.gov/goga/pets/anpr/pdf/federal_panel_recommendation.pdf.](http://www.nps.gov/goga/pets/anpr/pdf/federal_panel_recommendation.pdf)]

The Federal Panel concluded in its November 2002 recommendation to the GGNRA it would be appropriate to create a Section Seven Special Regulation to allow off-leash recreation in the GGNRA.

At that time, the GGNRA could have instituted the 1979 Pet Policy as the Section Seven Special Regulation for the GGNRA. Instead, they decided to institute Negotiated Rulemaking (NR) to create a new pet management policy for the GGNRA.

Prior to NR starting, in 2004, a Federal magistrate reviewing tickets issued to dog guardians determined that the 1979 Pet Policy had been illegally rescinded, and re-instated the 1979 Pet Policy as the controlling law for off-leash recreation in the GGNRA

Again, even with the legal protection of a court order, the GGNRA chose not to institute the 1979 Pet Policy as the new Section Seven Special Regulation. Instead, the GGNRA appealed the Federal Court's decision. In 2005 the GGNRA lost their appeal. The 1979 Pet Policy was affirmed as the controlling pet policy in the GGNRA.

Judge Alsup of the Federal Court noted in his decision affirming reinstatement of the 1979 Pet Policy in the GGNRA, his findings regarding the history of pet management in the GGNRA:

"In sum, for more than twenty years, the GGNRA officially designated at least seven sites for off-leash use. This was not accidental. It was a carefully articulated, often studied, promulgation. The responsible GGNRA officials in 1978 and thereafter presumably believed they were acting lawfully. Even now, the government concedes that the GGNRA had full authority at all times to relax the general leash rule at the GGNRA but argues it could have done so, at least after 1983, only via a "special regulation." In other words, the agency allegedly used the "wrong" procedure back in 1978 (and thereafter) even though a "right" procedure to reach the desired result was available and could have been used. The government has not revealed its internal justification for following the "wrong" process.

Whatever it was, the justification was abandoned in 2002 with the two-word explanation that it had been "in error." With this ipse dixit, the NPS wiped away two decades of policy, practice, promulgations, and promises to the public." (United States v. Barley, Order Of Affirmance, supra, p. 5.)

ID:

Received: May,27,2011 00:00:00

Correspondence Letter

Type:

Correspondence: I have attached four letters to this cover letter to you. Please consider these letters as my comment submittals to the DEIS Dog Management Plan along with this cover letter.

1. April 23, 2007 letter to Supt. Brian O'Neill 2. October 2007 letter to Chris Powell 3. January 5, 2007 letter to Maj. Gerald McCarthy, US Park Police 4. October 9, 2008 letter to The Golden Gate Raptor Observatory

1. and 2. Are representative of the major exclusions to the residents of Marin County in regard to a Dog Management Plan 3. Lack of correct understandingj signage of rules by Park Police and Rangers promotes conflict amongst Park users and enforcement officers 4. Lack of correct information between Park Partners and Park enforcement personnel promotes conflict amongst users

All of the above letters serve as my comment submissions for the DEIS Dog Management Plan.

Respectfully,

Jane Woodman

Sausalito, Ca. 94965

May 27, 2011

April 23, 2007 Brian O'Neill, General Superintendent Golden Gate National Recreation Area Ft. Mason, Building 201 San Francisco, CA 94123

Re: Dog Management Plan and Regulations and EIS for Golden Gate National Recreation Area in Marin County

Dear Mr. O'Neill:

I am writing to you in regard to the need to provide a meaningful opportunity for public involvement on the above referenced subject. As Supervisor McGlashan's appointee for this process, I need to register our joint concern that Marin County has been given too little input in the process, and it affects us deeply. Many members of the public who care for and treasure these extraordinary public lands in Marin County have effectively been excluded from the current process, as have the areas they

have enjoyed for so many decades.

A quarter million people live in Marin County. This letter is being sent on behalf of these residents, and the many other residents of adjoining counties who currently use and have for decades enjoyed the use of the Golden Gate National Recreation Area ("GGNRA") for recreation with our dogs. We are well-aware that this is a difficult subject on which to find consensus.

The National Park Service initiated a commendable integrated negotiating rule-making process and NEPA environmental impact statement (EIS) in an effort to bring diverse interests together to develop a dog management plan for the GGNRA consistent with the 1980 GGNRA General Management Plan's objectives of conservation, diversity of visitor experiences, and other adopted goals.

However, the National Park Service chose to make at least three major exclusions to this process:

~ The rulemaking notice excluded nearly all of the areas currently and historically open to people with their dogs in the GGNRA in Marin County. The attached sheet shows a comparison of the areas allowed under the existing 1979 Pet Policy and the areas excluded from consideration in the notice of negotiated rulemaking.

~ The scope of the EIS as described in the notice of intent to prepare an EIS issued by the National Park Service on February 22, 2006 stated the EIS is for a Dog Management Plan for the Golden Gate National Recreation Area. The notice said the EIS is being prepared to "facilitate informed decision-making" as part of negotiated rulemaking process "to reach consensus" for the management of dogs "within the park" largely because of "intense public interest and debate." The EIS is required to provide adequate analysis of alternatives and impacts for dog management decisions throughout the GGNRA.

~ The people directly affected by removing Marin County areas from the reg-neg/EIS process have been excluded from the Committee table and from meaningful involvement in the Park Service's current study and decision process.

These blanket exclusions seem contrary to the "Good Faith Participation" standards for rulemaking to which the National Park Service has pledged. These exclusions seem inappropriate from a public interest, environmental, and legal basis.

The boundaries of the GGNRA include approximately 76,000 acres. The NPS GGNRA staff manages less than half of these acres. Most of the

GGNRA is managed by other agencies. Of the approximately 30,000 acres managed by the NPS GGNRA, more than half of these acres are in Marin County. Yet, most of the 1979 Pet Policy sites in Marin have been removed from regneg consideration, and there is no seat for Marin County people with dogs at the Committee table. The topic of this rule making is focused on dog "management" and the appropriate tools to allow a diversity of experience without unacceptable impacts. Excluding Marin sites without proper review, and excluding representation from Marin for people with dogs, harms thousands of people and runs counter to an objective, open-minded review.

The continuation of the existing 1980 GGNRA General Management Plan and the 1979 Pet Policy is the 'no action' alternative in the EIS. As the rules and recent court cases make clear, a programmatic or site specific decision by the National Park Service to amend the existing plan and policy and take an action to remove, close or restrict existing access requires environmental review under NEPA. Even if the National Park Service chooses to exclude nearly all of Marin County from the negotiated rule-making process, the EIS is still required to provide adequate analysis of alternatives and their environmental impacts subject to public review so that an informed decision can be made. A conclusory statement in a federal register notice does not pass this test.

NEPA requires fair consideration of all reasonable alternatives and their impacts on the human environment. As the NEPA Rules state in the definition of human environment: "When an environmental impact statement is being prepared and economic or social and natural or physical environmental impacts are interrelated, then the environmental impact statement will discuss all of these effects on the human environment." Among these is the effect on the people and communities that would be excluded from using the GGNRA in Marin County.

Our residents are among those most directly harmed and affected by a decision to remove Marin County areas from consideration. We think the negotiated rule-making process should include these areas, either now or as part of an expanded "reg-neg" process if the current round makes progress. Many of us who live in Marin County or use the GGNRA in Marin County also use other areas and parks in the GGNRA. Our use of these areas, as well as the rules that may be developed in the "reg-neg" process, directly affect us. We think it is reasonable for us to participate in these discussions.

If you disagree, I request the courtesy of meeting and working with your staff and you in a meaningful way to discuss the scope of the EIS on these topics, and the options for fair and impartial consideration in your decision on any dog management plan covering Marin County. Supervisor

McGlashan's staff would also like to be engaged in this discussion.

Respectfully yours,

Jane Woodman Sausalito, CA 94965

(1) Attachment

Cc: Senator Barbara Boxer Senator Dianne Feinstein Congresswoman Nancy Pelosi Congresswoman Lynn Woolsey Supervisor Charles McGlashan

Chris Powell, GGNRA Good Morning Chris:

I just returned from out of country yesterday, and am trying to catch up on what has transpired in the "dog negotiations" in my absence. I was dismayed to learn that the Technical Subcommittee meeting of October 3rd was cancelled, and that the suggestions going forward to the Full Committee will be coming from the "small groups" that you and the facilitators have appointed. There have been three of the "small group" meetings so far, and another is now scheduled for October 19th. So far these meetings have had no "users with dogs" representative from Marin, and yet the first of these meetings was spent entirely on discussing dogs on Rodeo Beach.

Those present at the meeting discussing Rodeo Beach of September 27th were: Martha, Gary and Linda ("users with dogs" representing sites in the City), Judy Teichman from Marin for the equestrians, Erin Brody from Marin for the Marine Mammal Center, David Robinson, of SF Coleman Advocates for Youth, and finally Gordon Bennett from Marin for the former GGNRA Advisory Committee. Betsy Cutler Bob Panthold, seniors and disabled

Mr. Bennett has appeared at just one Technical Subcommittee meeting(attendance accorded all Full Committee members) during this year and a half Reg Neg process. He has not participated in any of the ongoing discussions, and yet you invited him to participate in the "small group" meeting regarding Marin sites. On the other hand, you did not include me (or my alternate Sonja Hanson in my absence) to attend the "small group" meetings where Marin sites were discussed. You had plenty of representatives from Marin for other user groups, but once again, you shut Marin "users with dogs" out of the discussions.

The meeting of September 28th had a similar composition: Martha, Gary and Linda ("users with dogs" representing sites in the City), Judy Teichman from Marin for the equestrians, Erin Brody from Marin for the Marine Mammal Center, Bob Panthold from San Francisco representing the disabled,

and at this meeting it was Betsy Cutler from Marin representing the former GGRNRA Advisory Committee.

At the meeting of October 3 you had: Martha, Gary and Linda ("users with dogs" representing sites in the City), Stephen Krefting from San Francisco League of Conservation Voters ,Erin Brody from Marin for the Marine Mammal Center, Bob Planthold from San Francisco representing the disabled, and Holly Prohaska from San Mateo representing the equestrians.

In response to my request on September 27th that a thoroughly informed "users with dogs" representative from Marin be included in these "small group" meetings you replied: "check with Betsy Cutler, Gordon Bennett or Judy Teichman" they are the Marin representatives. None of these individuals represent off-leash dog users in Marin County, in fact they all represent other user groups in Marin. Am I missing something here, or are you?

You have excluded representation from Marin "users with dogs" from the very beginning of this process to the Full Committee. Mter much lobbying, we were "thrown a bone" for two seats at the Technical SubCommittee table to be appointed by the Marin Supervisors with Districts adjacent to the large Marin portion of GGNRA lands. Charles McGlashin appointed me as his representative on the Technical SubCommittee. I have attended nearly all Full Committee and Sub Committee meetings in the year and a half and the ones that I was unable to attend, Sonja Hanson attended for me.

My appointment by Marin County Supervisor Charles McGlashan and my attendance (and enormous amount of time expended) for a year and a half at the Technical SubCommittee meetings as the "users with dogs" representative from Marin have been for naught. You have determined that the final discussions and recommendations are to be made by a "small group" of your choosing that excludes a "users with dogs" representative from Marin.

It is clear that the Technical SubCommittee is "dead", and that any proposals going to the Full Committee for their last meeting on October 27th will come from the "small group" meetings. Given that, I am formally requesting inclusion to the "small group" meeting scheduled for October 19th, so that at least one of these "small group" meetings has a "users with dogs" representative from Marin in attendance.

Cordially, Jane Woodman

MAJOR GERALD MCCARTHY UNITED STATES PARK POLICE 1217
RALSTON AVENUE SAN FRANCISCO, CA. 94129 JANUARY 5, 2007

DEAR MAJOR MCCARTHY:

IT APPEARS THAT ONE OF THE REASONS THAT THE PUBLIC AND VARIOUS ENFORCEMENT AGENCIES ARE AT ODDS IN REGARDS TO OFF-LEASH DOG POLICIES IN THE GGNRA (AND AT TIMES VERY UNPLEASANT CONFRONTATIONS ARE RECORDED) IS THAT YOUR OWN ENFORCEMENT PERSONNEL APPEAR TO BE CONFUSED AND EVEN UNAWARE ABOUT THE CURRENT OFF-LEASH LAW IN THE GGNRA. (NOT TO MENTION THIS OFFICER'S TERRIBLE ATTITUDE ACCOMPANYING THE LACK OF KNOWLEDGE OF THE CURRENT LAW)

A LARGE SIGN CORRECTLY REFLECTING THE OFF-LEASH STATUS AT RODEO BEACH IS POSTED ON THE METAL FOOT BRIDGE LEADING TO THE BEACH ITSELF. (JUDGE ALSOP RULING/ 1979 PET POLICY AND THE ONGOING NEGOTIATED RULEMAKING ON THE SAME SUBJECT.)

THERE WAS SOME CONFUSION/CONFLICT WITH SURFERS AND DOG OWNERS THIS PAST HOLIDAY WEEKEND AS A SMALLISH SIGN ON A POST NEAREST THE CLIFF AREA/PARKING AREA OF THE BEACH INCORRECTLY STATES DOGS WERE TO BE ONLEASH ON THE SAME BEACH, INCONSISTENT WITH THE CURRENT LAW AND OTHER SIGNS AT THE SAME SITE.

ON WALKING THERE THIS MORNING I DID SEE THE SMALL (CONFUSING) SIGN FOR MYSELF AND WHEN I HAPPENED UPON A U.S. PARK POLICE OFFICER EXITING HIS CAR INTO THE PRESIDIO FIRE DEPT. AT RODEO BEACH I ASKED HIM IF PERHAPS HE COULD HELP IN GETTING THAT SMALL SIGN REMOVED AND AID IN GETTING A PROPER ONE INSTALLED FOR CONSISTENCY. I WAS GREETED WITH "THERE IS NOWHERE IN A NATIONAL PARK WHERE DOGS CAN BE OFF-LEASH". I VERY (VERY) GENTLY STATED THAT INDEED WE WERE IN THE MIDDLE OF NEGOTIATED RULEMAKING AND THAT THE CURRENT STATUS AT RODEO (AND 8 OTHER LOCATIONS IN MARIN ALONE) ARE OFF-LEASH/UNDER VOICE CONTROL. THIS TIME THE OFFICER'S STEPPED UP RESPONSE TO ME WAS "WHAT IS IT THAT YOU DON'T YOU UNDERSTAND ABOUT THE RULES?".

I TRIED YET AGAIN TO MAKE IT CLEAR THAT I WAS SIMPLY TRYING TO ASK HIS HELP IF POSSIBLE IN GETTING THE SIGNAGE CONSISTENT WITH THE CURRENT RULE POINTING OUT THE LARGE SIGN ACROSS THE STREET FROM WHERE WE STOOD INDICATING OFF-LEASH USE. THIS TIME THE REPLY WAS "WHAT IS IT YOU WANT FROM ME?". HE THEN DASHED

INTO THE FIRE STATION BEHIND A LOCKED DOOR AND DID NOT REAPPEAR. (LEAVING THE DOG IN HIS K-9 U.S. PARK POLICE VEHICLE *LICENSE # 0311 A BARKING HIS HEAD OFF)

I THEN MADE CONTACT A FEW MINUTES LATER WITH A PARK RANGER WHO SAID HE INDEED WOULD SEE TO IT THAT THE IMPROPER SIGN WAS REMOVED AND REPLACED WITH ONE CONSISTENT WITH THE SIGN INSTALLED AT THE FOOTBRIDGE REFLECTING THE CURRENT OFF~LEASH STATUS AS SOON AS POSSIBLE. UPON RETURNING HOME I CALLED THE PARK POLICE DISPATCH TO SEE WHO THE U.S. PARK POLICE OFFICER MIGHT HAVE BEEN SINCE HE STAYED BEHIND A LOCKED DOOR AND DID NOT RETURN. I WAS TOLD THAT THE ONLY K~9 OFFICER ON DUTY TODAY WAS OFFICER NEIL WOO.

SINCERELY, JANE WOODMAN SAUSALITO, CAL. 94965

CC: CONGRESSWOMAN LYNN WOOLSEY MARIN COUNTY SUPERVISOR CHARLES MCGLASHAN GGNRA SUPERINTENDENT BRIAN O'NEILL

To: The Golden Gate Raptor Observatory Date: October 9, 2008 Re: Intolerance in the Headlands

By 7:00 a.m. this morning I was enjoying a glorious morning walkhike on the Miwok Trail and was returning to my car down the old military paved road above Rodeo Beach (trail begins at the gate near the Marine Mammal Center).

The sun had just risen, the cool scent of Fall was in the air and the mist was hanging on the lagoon below. I was in heaven in the Headlands.

With me were my two companion dogs. Both of whom have perfect trail manners (i.e. do not chase wildlife, come when called on one recall and who remain very close to the me, the responsible owner) . In my hand was a biodegradable bag (with waste) which was being removed from the Park by me as well.

Walking down the hill at around 8:15 a.m. I could hear the crunch of gravel and the roar of engines as a caravan of SUV's roared up the abandoned road. (Gee, someone else just might be on that road) In the past all walkers (with or without dogs) and drivers have waved in pleasant acknowledgement and gone their separate ways. The cars to the bird cages, the walkers to the trails.

Not today. The last in the caravan was a car, separated by a distance from the rest. A new white Mercedes wagon screamed to a halt, then backed up,

albeit almost putting themselves in a ditch for the effort, out jumped a man, hand on hip telling me "dogs must be on leashes out here" showing me with his arms outstretched indicating The Headlands in general.

I in response offered that his information was not correct, that indeed the 1979 Pet Policy rules were intact, and that voice-control on leash was the rule for this road as it was for the Miwok Trail above which we had just hiked. He offered that the Park Rangers in residence out at Ft. Cronkhite had told him so. I suggested he check with Chris Powell at the NPS." He then said he would ask the rangers again. I countered with "please ask Chris Powell as the rangers historically have Jiverde information". I am enclosing a current map of the Marin Headlands for your information and my edification, printed with the same funding that you apparently receive from the Golden Gate National Parks Conservancy.

I have not thought to complain about your use of caged wild birds housed on the hillside above the Marine Mammal Center to aid in your banding/observatory efforts. What you do at the Raptor Observatory is on the same 30,000 GGNRA acres shared by the entire of the San FranciscolMarin County for recreation. (The IIR" in GGNRA stands for recreation, as the Enabling Legislation creating it intended). Nature needs to be protected but not at the exclusion of others.

The NPS issues permits for events like weddings with amplified music on Rodeo Beach. There are numerous Park Partners sharing space in Ft. Cronkhite buildings. There is a constant How of loudly exuberant children from the Headlands Institute using the same paved road shared by GGRO. There are dirtroad bicycles, horsehack riders, surfers, a fire station, The Marine Mammal Center, Youth Hostel, Arts Center, YMCA, workforce housing all sharing the same area with their own noise level and attendant activities. All those combined currently prove that the area is already heavily used and shared.

Please inform your 250 volunteer members as well as your staff that well-behaved people and dogs in the GGNRA are currently a part of tolerance and sharing in a increasingly intolerant world.

Correspondence ID: 4674 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: The GGNRA continued to flout both recommendations that it solicited from the Federal Panel and the Court decision to reinstate the 1979 Pet Policy as the law governing pet management in the GGNRA. In 2007, Daphne Hatch, Chief of Natural Resources Management and Science for the GGNRA was quoted in the

San Francisco Chronicle as saying: "Ocean Beach without the people is an incredible habitat. But people think of it as a sandbox or their backyard."

While Superintendent O'Neill gratuitously stated that the Court "effectively reinstated the 1979 Pet Policy", the GGNRA refused to acknowledge the reinstatement of the 1979 Pet Policy in the manner prescribed by law, 36 C.F.R. Section 1.7(b). There was no written designation of the reinstated off-leash properties; indeed, the GGNRA used this murky situation to continue to harass and ticket off-leash dog-walkers in areas that were off-leash pursuant to the 1979 Pet Policy and amendments thereto. In addition, the GGNRA, in violation of 36 C.F.R. Section 1.7(a)(4), persisted in ignoring the Court's ruling and misinforming the public. For example, on the NPS website, under the heading, "Dogwalking Information and Regulations", a statement dated June 8, 2005, proclaims: "Due to the recent court ruling, this information is under review and will be revised shortly." A brochure found online at the NPS website entitled, "Enjoying the Park with your Dog", advises readers that, "Where dogs are permitted, Federal law requires that they be on a leash, not to exceed six feet in length, in all units of the National Park System."

In addition, for over a year, GGNRA management refused to change the signage in the Park to reflect the Court's ruling in derogation of 36 C.F.R. Section 1.7(a)(1)(4). For photo documentation of the illegal signage, see <http://oceanbeachdog.home.mindspring.com/id8.html>. This illegal and confusing signage clearly created user conflict and was detrimental to the safety and enjoyment of those visiting the GGNRA.

I would add as an aside at this point, objectives listed in this DEIS were the desire to enhance Visitor experience and Safety, enhanced compliance with Dog Rules, and Park Operations. It should be evident from this point in GGNRA history, that the greatest obstacle to fulfilling these objectives was and still is GGNRA Management itself.

Despite the fact that GGNRA management had been given permission to create a Section Seven Special Regulation for off-leash recreation in the GGNRA; when the Court reinstated the 1979 Pet Policy, the Superintendent refused to make the 1979 Pet Policy a Section Seven Special Regulation. He instead instituted a Negotiated Rulemaking (NR) process that was conducted in bad faith, was unlawful and did not reach consensus. The GGNRA refused to acknowledge the 1979 Pet Policy as the logical starting point for NR. In fact, the 1979 Pet Policy was not listed as a document the NR Committee would be able to refer to within the NR process. The GGNRA continued to cling to their view that the 1979 Pet Policy was an illegitimate document which NEVER had the power of law despite the contrary findings of the Court.

NR required consensus among participants. If consensus was not reached for a Section Seven Special Regulation, the GGNRA was allowed to create a Rule

arbitrarily, as it did when they rescinded the 1979 Pet Policy. In fact, even if the NR did reach consensus, the GGNRA maintained that they were still free to ignore the findings of the NR process and subsequently create its own rule.

The GGNRA selected the participating groups and their representatives. Six of the nineteen groups that participated had submitted a petition to the Federal government asking that ALL off-leash recreation in the GGNRA be banned. These same groups had both publicly and privately stated they saw NR as a means to eliminate off-leash recreation from the GGNRA entirely. Despite protests, they remained on the NR Committee.

I was initially slated to participate in NR as a representative for Ocean Beach DOG (OBDOG). When I discovered the flawed manner in which this process was to be conducted, I complained. Instead of resolving my legitimate complaints about the process, the GGNRA/NPS/DOI threw me off the NR Committee. NR predictably came to an end without consensus, and was a colossal waste of taxpayer money to the tune of over five hundred thousand dollars.

Subsequently, the initiation of the DEIS was announced. The explanation for this might be found in a quote from then Western Regional Director (now NPS Director) Jon Jarvis. At the NPS Centennial Initiative Listening Session (Presidio Officer's Club, San Francisco, Calif., March 22, 2007) Director Jarvis said to me and my husband, and I quote, "I would rather give up those [the GGNRA] properties than have dogs running loose on them." In 2008, the GGNRA supported an attempt by Nancy Pelosi to surreptitiously slip a Park name change (and therefore a change in the governing mandates) from National Recreation Area to National Park through bill H.R. 6305. This action can be construed as an admission that the NPS/GGNRA is aware their actions do not conform to the enabling legislation. Public outcry upon the discovery of this section in HR 6305 forced Nancy Pelosi to withdraw her blatant attempt to circumvent the will of the people and the Federal Court.

Now in 2011, we are presented with this 2400 page DEIS.

Evaluation Of The Actual DEIS

There is no "monitoring of the vital signs" of the GGNRA to support the premise of this DEIS. Further, the failure to complete vital signs monitoring in a competent manner violates Federal law as outlined in the NPS resource "Vital Signs Monitoring".

(<http://science.nature.nps.gov/im/monitor/LawsPolicy.cfm>). A list of laws violated due to the failure to monitor (per this resource) is listed below:

? National Park Service Organic Act ? General Authorities Act of 1970 ?
Redwood National Park Act ? National Environmental Policy Act of 1969 ?

Clean Water Act ? Clean Air Act ? Endangered Species Act of 1973 ?
Environmental Quality Improvement Act of 1970 ? Coastal Zone Management
Act of 1972 ? Marine Protection, Research, and Sanctuaries Act of 1972 ?
National Parks Omnibus Management Act

The failure to complete competent "vital monitoring" results in the following fatal flaws in this DEIS:

1) The Draft Plan/DEIS assumes but does not provide the required rigorous analysis that resource conditions result solely from dog use of the sites, discounting the contribution from other visitors and recreational users. The Draft Plan/DEIS does not address the contribution of other impactful activities, including special events, to the resource conditions and existing impacts at each of the GGNRA sites.

2) In many places, the Draft Plan/DEIS does not provide any data on actual impacts by dogs in areas being proposed for new dog walking restrictions. The words can, may, and could are everywhere in place of hard facts which would have been in evidence had the required "vital monitoring" been done. In places where data are provided, the Draft Plan/DEIS makes undocumented assumptions that there are unacceptable impacts and that dogs are the culprits.

3) The Draft Plan/DEIS assumes species are present in areas where there is no record of their presence. In other places, there is inconsistent information about the presence of species.

4) Many of the findings in the Draft Plan/DEIS are founded on a reference included in the document as Appendix G, "Law Enforcement Data" (NPS 2008c). This reference document is critically deficient in substantiating statements made in the characterization of existing conditions and in the analysis of the environmental consequences. For example, an entry is as follows: "observed a black dog chasing a flock of 14 snowy plovers. I observed the dog chasing the birds from the water to the dunes and up and down the beach for several hundred meters north and south. The dog would charge at the birds and the Plovers would fly away from the dog. Each time the Plovers would attempt to land, the dog would charge directly at them and cause them to take flight again. I watched this happen for continually for eight minutes timed by my watch from 1150 to 1158 hours. Then the dog stopped chasing the Plovers and wandered in the hilly dunes to the north for several minutes. The dog then returned to chasing the Snowy Plovers for a few minutes more ... After the dog ceased chasing the Plovers, they stopped taking flight and started feeding at the water line." Clearly, if this dog was chasing plovers, they would not have returned to feeding at the water line after the chase was over. Plovers feed at the high tide line when the water has already retreated. These were sanderlings, birds that appear almost identical to the plover, are plentiful at Ocean Beach (not threatened or endangered) and can be differentiated by different feeding patterns and different

resting patterns.

5) The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but no data are provided as to where/if they are actually present.

6) The Draft Plan/DEIS assumes, but fails to demonstrate, the "cause and effect" relationship that where dogs are present within GGNRA sites, there is a disturbance of natural resources or demonstrate that the disturbance of resources is attributable to dogs (versus other factors).

7) The Soils and Geology section (page 225) includes the following statements: "Dogs and dog walkers that do not stay on designated trails and venture offtrail create social trails that become denuded of vegetation and result in increased soil compaction." and "Soil compaction is common along social trails that have been created by -and are heavily used by -bikers, hikers, runners, and dog walkers." The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. There is little or no objective measurement of trail degradation in this DEIS. Condition-class systems are commonly used in visitor impact monitoring, and trail incision measures assess erosion but we do not see those measurements in this DEIS. Once again, the "vital sign monitoring" is entirely absent in this DEIS.

8) Because the draft EIS does not recognize recreational resources as an environmental resource, the analysis of the environmentally preferable alternative is flawed. Recreation is identified in the GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognizes that the achievement of these outstanding values is not mutually exclusive.

9) When new lands become part of GGNRA, the recreational uses existing at the time of acquisition should be allowed to continue unless GGNRA determines, through the public land planning (vital monitoring) and NEPA process that unacceptable impairment would occur.

10) The Draft Plan/DEIS not only fails to disclose and evaluate the impacts of the alternatives on recreational resources in the context of an urban environment, it dismisses the quality of the urban environment entirely on page 22 where it states, "the quality of urban areas is not a significant factor in determining a dog management plan." As recognized in its enabling legislation, one of the most important aspects of the GGNRA is the sharp contrast between its undeveloped open spaces and the adjacent developed urban environment. The GGNRA's open space and recreational opportunities are intended to provide refuge and relief for nearby urban dwellers. According to NEPA, An EIS is required to analyze the

human environment. The federal NEPA rules define the human environment and its scope in an EIS as follows: "Human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." When an EIS is prepared and human and natural/physical environmental effects are interrelated, the EIS should discuss all of these effects on the human environment. The flaws listed above will be highlighted by further analysis of the Western Snowy Plover at Ocean Beach and Crissy Field, the Bank Swallow at Fort Funston, Sweeney Ridge, Mori Point, Muir Beach and review of trails in Marin County.

Alleged Protection For The Western Snowy Plover

This DEIS proposes to further restrict dogs at Ocean Beach and Crissy Field based upon an alleged necessity to protect the Western Snowy Plover. The language of the Endangered Species Act contemplates and supports the position that any loss of these recreational areas for such purpose be balanced by scientific proof that such sacrifice will indeed help save the plover from extinction.

The requisite monitoring of the plover (as dictated by NPS regulations) in the GGNRA has not been completed in a manner that would provide scientific proof of a need for restrictions. In fact, even the GGNRA admitted in 1996 that the scientific evidence showed that restriction of off-leash recreation will NOT increase the number of plovers at Ocean Beach. It is more likely that the restriction of off-leash recreation in these areas will negatively impact the plover population.

There was a "study" at Ocean Beach in 1996 by Daphne Hatch, GGNRA Wildlife Biologist, which was more of an inventory assessment, and its conclusions are fatally flawed. I will review that "study" in detail here. The next "study" the GGNRA performed with respect to this "threatened" resource at Ocean Beach was in 2006. Hardly an example of vital signs monitoring that meets the standards described in NPS documents. Restrictions were implemented at both Ocean Beach and Crissy Field, based upon this "study" although the "study" was only conducted at Ocean Beach. Further, without mitigation measures implemented over this 10 year time span, and without coordination of intermittent monitoring, it is impossible to draw any conclusions as to the benefit/detriment of restricting or eliminating dogs within these respective ecosystems. The last "study" of the plover in this DEIS was performed in 2008, and is at Crissy Field only. This "study" will be reviewed within this document, but it is again fatally flawed in many respects.

Is The Western Snowy Plover In Danger Of Extinction?

The best scientific data currently available establishes that the Western Snowy Plover is not threatened or endangered (at risk for extinction) at all.

Significantly, a study commissioned by the US Fish and Wildlife Service (USFWS) and the US Geological Service (USGS) in June of 2000 noted: "Coastal and inland populations of Snowy Plovers in the western United States are currently being managed separately; coastal populations are protected as a Distinct Population Segment under the U.S. Endangered Species Act, while inland populations are not listed. Our study provides no evidence of genetic differentiation between coastal and inland populations." (Emphasis added.) These findings demonstrate that the Western Snowy Plover population is far greater than previously believed, and so large as to no longer qualify the Western Snowy Plover as either threatened or endangered.

Why Is The Western Snowy Plover Still Considered Threatened With Extinction?

The latest decision by the USFWS to continue to keep the Western Snowy Plover (WSP) on the Endangered Species List (ESL) is a clear example of the violation of the Endangered Species' Act's requirement that decisions be "based upon the best scientific and commercial data available". Traditional tenets of science (the scientific method) have been ignored to justify this conclusion.

The scientific method is the process by which scientists, collectively and over time, endeavor to construct an accurate (that is, reliable, consistent and non-arbitrary) representation of the world. In summary, the scientific method attempts to minimize the influence of bias or prejudice in the experimenter when testing a hypothesis or a theory.

The scientific method has four steps

1. Observation and description of a phenomenon or group of phenomena. Based upon monitoring of the movements of the plovers on the west coast (the WSP) and inland plovers, and the perceived decline of the WSP, the USFWS became concerned as they believed the WSP was a species distinct from the large inland population of plovers, and as such required protection from extinction. The Western Snowy Plover was first listed as a threatened species in 1993. Quoting the USFWS (all of their quotes will be italicized):

"The 1993 listing rule stated that the Pacific Coast WSP is "genetically isolated" from the interior breeding populations (58 FR 12864). We based this conclusion on banding and monitoring data, not genetic data. At the time of listing, we assumed the reproductive separation indicated by the banding data, over time, could lead to genetic differentiation. Genetic data/or the western snowy plover was not available in 1993. /I

2. Formulation of a hypothesis to explain the phenomena. The hypothesis, as stated above, was: Because there was little or no breeding observed between the WSP and the inland population of plovers, the WSP was genetically different

than the large population of plovers living inland, and being in decline, the WSP required protection.

3. Use of the hypothesis to predict the existence of other phenomena, or to predict quantitatively the results of new observations.

Should genetic testing be performed, the USFWS expected to see genetic differences between the coastal WSP population and the large inland population, which would confirm the need for protection of the WSP. The USFWS had no genetic data to confirm their hypothesis. However, apparently the ESA allows the USFWS to move to protect a species first, and investigate to be sure, later. There are timelines specified by law as to how long the USFWS has to test their hypothesis, and it does seem they were abused. In the meantime, measures were taken to protect the WSP, which included most notably for the public, restriction of beach access.

4. Performance of experimental tests of the predictions by several independent experimenters and properly performed experiments.

In fact, a study was done many years later funded and approved by the USFWS and the USGS to test the USFWS hypothesis.

"...a master's thesis (Gorman 2000) that did not find evidence of genetic differentiation between the Pacific Coast WSP and western interior snowy plover populations using mitochondrial DNA (mt DNA). tt

The Scientific method concludes: If the experiments bear out the hypothesis it may come to be regarded as a theory or law of nature If the experiments do not bear out the hypothesis, it must be rejected or modified.

So, now that the USFWS hypothesis had been disproved, and the WSP could not be distinguished genetically from the very large inland plover population did the USFWS move to delist the WSP? NO. In fact, they continued to proceed to implement management policies to protect the WSP, further restricting the public's access to beaches on the Western coast. Several entities (City of Morro Bay and Surf Ocean Beach Commission) who were suffering due to those management policies decided to sue the USFWS to force them to re-evaluate this situation.

The announcement to retain the WSP's listing as a threatened species on April 21, 2006 is the USFWS response to this lawsuit. It appears that the USFWS, not wishing to delist the plover, refused to reject their hypothesis or modify their hypothesis that the WSP was genetically different, even though it had been reliably disproved. It is not revealed in the announcement how this came about, but it appears that the USFWS authorized another study in an attempt to refute this first study that disproved their hypothesis. USFWS stalled the court

proceedings, possibly because they were counting upon the results of this second study using another method of DNA testing to substantiate their original hypothesis that the WSP was genetically different from the large inland population. The second study confirmed the results of the first.

"...a more recent study by Funk et al. (2006) includes analysis of microsatellite DNA markers. Funk et al. (2006) found no statistically significant genetic differentiation between Pacific Coast WSP and western interior snowy plover populations using mtDNA and microsatellite DNA markers. "

Did the USFWS at this point acknowledge their hypothesis was incorrect and move to delist the WSP because it is the same creature as the large population of plovers who live inland and whose numbers require no protection from extinction? NO.

Perhaps most telling is the general opinion of Daniel Funk who provided the second DNA study, and whom the USFWS certainly chose to rely upon: " ... it is important to use data from a wide range of criteria-interbreeding, nuclear DNA, behavior, morphology, ecology, etc.-not just mtDNA, when delimiting species boundaries."

This is indeed a disturbing concept, because this indicates Mr. Funk and the USFWS are quite comfortable setting public policy that restricts public access to thousands of miles of beach property based upon their personal definition of a species which may ignore verifiable hard DNA data in deference to intangible and/or incomplete data which is subject to bias. The USFWS chose to rely upon outdated, observational data regarding the lack of interbreeding of the WSP and the larger inland population to conclude that these two populations are separate and distinct and that the WSP should therefore, still be protected.

"In this finding, we rely primarily on the banding and resighting efforts conducted during the period of 1984 through 1993, as this is the period when banding efforts were underway at several areas on the Pacific coast and in the western interior, and nest monitoring studies and breeding season surveys were underway at many locations when banded birds could be detected. Interior populations have not been banded since 1993 (L. Stenzel, in litt. 2005)."

Furthermore, the USFWS ignored yet another fundamental of the Scientific Method in the interpretation of this outdated data. The USFWS recruited four heavily biased researchers in favor of protection of the snowy plover to examine the banding data. All four are associated closely with the Audubon Society or Point Reyes Bird Observatory (PRBO). The Audubon Society formally opposed the delisting of the plover and officials at PRBO are in large part responsible for the initial listing of the plover as threatened. Not surprisingly, their conclusions were as follows:

" ... we conclude that the Pacific Coast WSP is markedly separate from other populations of the subspecies due to behavioral differences and that it, therefore, meets the requirements of our DPS policy for discreteness. Banding studies and resighting efforts demonstrate that during breeding, the Pacific Coast WSP segregates geographically from other members of the subspecies, even those that also winter on the Pacific coast. Although not absolute, this segregation is marked and significant. "... This behavioral difference tends to set Pacific Coast WSP individuals apart from the interior birds with which they may mix during the winter."

The USFWS has chosen to deviate from established scientific method, ignore incontrovertible, tangible, and specific data such as the two DNA studies, and rely instead upon clearly biased assumptions regarding the behavior and breeding of the WSP to justify their decision. The decision requires the USFWS to assume that there is little or no interbreeding between the populations. The decision requires the USFWS to assume that should the coastal plover population be lost, the inland population could not recolonize the coast. Neither of these assumptions has the benefit of reliable, incontrovertible data.

Therefore, since 20% of the plovers have decided they prefer to "hang out" on west coast beaches rather than with the rest of the genetically identical plovers inland, the general public will not be allowed that privilege.

For those unfamiliar with the genetic lexicon, consider how it is the Courts and the medical community determine the father of a child when it is in doubt. DNA tests are the standard test utilized, to the exclusion of all others. It would be a gross injustice for the Court to disregard DNA evidence that confirms the child's father is Mr. A, and instead conclude the child's father is Mr. B simply because the child behaved more like Mr. B.

Decisions made based upon intangibles, and without deference to hard, reliable scientific data are subject to abuse of discretion; and are the antithesis of the established "scientific method" which goes to great lengths to minimize the influence of bias or prejudice in the experimenter when testing an hypothesis or a theory. The Endangered Species Act requires decisions to be based upon science's best evidence, not ideology or politics as it has been in the case of the Western Snowy Plover.

While I and others understand that the GGNRA cannot choose to ignore management of the Western Snowy Plover unless and until the USFWS formally delists the plover, we believe this evidence should temper the decision making when it will result in depriving the public of valuable recreational resources, as expressed in the language of the ESA.

Will Banning Dogs At Ocean Beach Help Protect The Plover From Extinction?

Putting aside the controversy as to whether the Western Snowy Plover is threatened with extinction or not, the United States Fish and Wildlife Service ("USFWS") Draft Recovery Plan for the Western Snowy Plover can answer this question. The Recovery Plan states that the Western Snowy Plover does not nest or breed at the Ocean Beach location. The Draft Recovery Plan also indicates that despite implementation of best management practices, this location (Ocean Beach) holds NO promise for the plover to nest or breed there in the future. (Table B-1, p. B-11.) Conversations with Gary Page of the Point Reyes Bird Observatory (a central contributor to the USFWS Draft Recovery Plan) reveal that this conclusion was drawn primarily because the level of human activity is too high on some California beaches to ever support a breeding population of the plover. This is consistent with the conclusions of a UK study (specifically identified in the new studies section of this comment) which states, "Sites that are highly disturbed are not used by breeding birds, and therefore any increase in disturbance levels on these sites will not alter population size". Thus, the state of the evidence is that the survival or extinction of the Western Snowy Plover population will not be impacted by the management of Ocean Beach.

And in fact, the GGNRA is well aware that the number of plovers on Ocean Beach is not directly related to the number of people or dogs present on the beach. Indeed, the first Hatch Report regarding the WSP and dogs at Ocean Beach concluded: "Factors other than number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach." (1996 Hatch Report, p. 10, emphasis added.) Further, Daphne Hatch's 1996 study for the GGNRA documented that since the off-leash policy was officially sanctioned in 1979, there has been an increase of more than 100 percent in the number of snowy plovers frequenting Ocean Beach. Even dog "rush hours" don't seem to faze the plovers—at least, GGNRA observers and analysts couldn't find any negative relationship between the number of dogs on the beach at any given time and the number of plovers on the beach at the same time (pg. 10, 13). Faced with this evidence, GGNRA officials twice acknowledged, at a December 16, 1996 "informational meeting" for San Francisco beachgoers, that banning off-leash recreation or banning dogs entirely at Ocean Beach would have NO effect on the number of plovers on Ocean Beach. Despite this finding, the 1996 Hatch report still recommends the restriction of off-leash recreation at Ocean Beach.

The USFWS Declines To List Ocean Beach Or Crissy Field As Critical Habitat For The Western Snowy Plover

As stated before, the fate of the purportedly threatened Western Snowy Plover ("WSP") at Ocean Beach and Crissy Field will have no impact upon the overall survival of the species. Consider that the language of the Endangered Species Act ("ESA") itself states:

"The Secretary (of the Interior) may exclude any area from critical habitat if he

determines that the benefits of such exclusion outweigh the benefits of specifying that area as critical habitat, unless he determines, based upon the best scientific and commercial data available, that the failure to designate such area as critical habitat will result in extinction of the species concerned. "

In concurrence, effective October 31, 2005 and again in 2011, the United States Fish and Wildlife Service ("USFWS") excluded all areas in the City and County of San Francisco as critical habitat for the WSP. In the text of the explanation of their decision in 2005, USFWS made the following findings:

+ Our current designation of critical habitat is different from the 1999 rule in two primary ways. In this designation, we utilized a different methodology for determining essential areas, and we relied upon additional scientific information which was not available in 1999. Thus, this rule, while similar in many respects to that in 1999, is a new designation, and does not designate the same areas. "

With respect to Ocean Beach, the following is stated:

+ We have decided not to include the suggested additional areas because they do not meet our three criteria from the Methods section: They do not support either sizeable nesting populations or wintering populations, nor do they provide unique habitat or facilitate genetic exchange between otherwise widely separated units. Although we do not consider these areas essential for recovery, we do consider them important, and will continue to review projects in these areas that might affect WSP as required by sections 7 and 10 of the Act. "

Allowing humans and off-leash dogs to enjoy Ocean Beach is not a new project; it is an activity that has persisted on Ocean Beach for well over 50 years. The language of the ESA contemplates and supports the position that any loss of these recreational areas be balanced by scientific proof that such sacrifice will indeed help save the WSP from extinction. Clearly, the decision not to include Ocean Beach or Crissy Field as critical habitat demonstrates that such scientific evidence cannot be provided.

Daphne Hatch's 1996 Study Is Fatally Flawed

Because the data do not support a conclusion that restricting off-leash recreation or banning dogs at Ocean Beach will increase the number of plovers, Daphne Hatch chooses to instead focus on the "disturbance" of the plover at Ocean Beach. However, no published study of a breeding bird quantifies the population consequences of disturbance. This is despite the fact that disturbance has been implied as a factor causing population decline for a wide range of species (Birdlife International 2000). Not surprisingly, it is postulated by Ms. Hatch that the energy expended by the plovers to avoid the disturbing dog is detrimental to their overall health and ability to breed, and as expected, no evidence is cited for such a conclusion. It is merely stated in the study, "little research has been

conducted on the energetic effects of disturbance and whether individuals can compensate for this lost energy intake and the increased energy expenditure" (P.13). The NPSjGGNRA must consider the fact that the plover is known to annually migrate over 1,000 kilometers. In proportion to their size, this is the equivalent of a 6-foot human running 290 marathons. Does the energy expended when a plover moves 20 or 30 yards to avoid a roaming dog amount to anything significant?

Common sense would indicate that the "disturbance" issue has been substantially overblown, and no scientific study exists to contradict such common sense.

Out of 5,692 dogs observed during the one-and-a-half-year study by Ms. Hatch, less than one-third of one-percent chased plovers, and none ever caught or harmed one. An even smaller number "inadvertently" disturbed plovers, causing them to walk, run or sometimes fly out of reach. at See 1 below.

On the other hand, Ms. Hatch did not document the more significant matter of the deaths and disturbances of plovers perpetrated by predators such as the gull, raven, and crow. The gull, raven, and crow are documented predators of the plover, while dogs are not. Ravens are black, cousins of the crow, and larger than crows -generally about two feet long. Federal officials, who attribute the soaring numbers of ravens to sharp increases in road-kill and garbage from fast-food restaurants, admit that the population explosion is troubling, given the bird's intelligence.

The Hatch Report is an excellent example as to why scientific studies vary in reliability. Based upon the standards set forth in the scientific community, Ms. Hatch's study qualifies as "junk science", that is, "a publication that has the tone and trappings of science, but is so fundamentally and demonstrably flawed as to lack any serious claim to credibility." Further, this study does not meet the minimum requirements for legitimate "vital monitoring" within the NPS.

The Hatch study is at best an inventory assessment for the Western Snowy plover. When viewed in the context of universally accepted scientific study guidelines, I find there are several reasons for relegating the Hatch Report to "junk science". First, it is merely an observational study. This means its conclusions are not based upon specific, quantifiable measurements, but instead upon observations. Observations alone allow for the participant's natural biases and subjectivity to influence the results. A credible scientific study to determine the success of, for example, a hair growth product, would dictate that the same person would observe the patients at the beginning and end of the treatment to assess the patients' baseline and subsequent hair growth (or lack thereof). This would eliminate the differences inherent in the observations of different people. The evaluator should have no affiliation with any of the manufacturers of the different products tested, and would not know which patient used which

product. This is necessary to eliminate an evaluator's desire (even if it is subconscious) to favor a particular product. In contrast, the evaluators in the Hatch study consisted of several different volunteers; accordingly, there was no consistency as to the observations. Some evaluators may have characterized plover movement as a disturbance; others might have believed the plover moved on its own. Moreover, the volunteers were all bird enthusiasts, and the specific focus of their study was humans and dogs. As a result, the very premise of the study would lead the volunteers to subjectively and/or subconsciously expect and desire to document disturbance of the plover by dogs and their owners.

The effects of other wildlife and other possible interferences with the plover's daily activities were given but brief mention and not factored into the study in any meaningful way. These issues include the following: beach cleaning, off-road vehicles driven at night, activity of specific predators, non-native vegetation, shoreline erosion control projects (bulldozers), the actual width of the beach available to the plover, weather, helicopters, airplanes, bicycles, vehicles used during the day by Park staff, kites, and an oil spill. An evaluator cannot distinguish the reason or reasons why a plover flies away to another spot given the presence of a dog 40 feet away, a raven 50 feet away, and a plane flying overhead. Yet in the Hatch study, it seems clear the dog would be identified as the factor that disturbed the plover. The Hatch study is one that does not compensate for participant bias, and is not able to effectively associate cause and effect because too many variables are unaccounted for. Hence the study is indeed "junk science". Daphne Hatch's conclusions are without merit, and perhaps worse, led to action which may have harmed the plover at Ocean Beach.

These facts raise the other problem with the operative hypothesis in a study concluding that off-leash dogs are detrimental to plovers. Because the Hatch study at Ocean Beach ignores gulls, ravens and crows entirely, there is no data to determine whether the presence of dogs protects the plover from birds of prey. The statistics in Daphne Hatch's own study indicate that during the period prior to this study, the number of plovers at Ocean Beach was increasing, even though there was no requirement for dogs to be on-leash. The maximum Snowy Plover counts for the 1979 to 1985 period ranged from 4 to 16, compared to maximum counts (since 1988) of from 38 to 85 birds (Hatch Report, p. 8). See Figure 2 below.

We believe that it is mischaracterizing the problem to attribute the "disturbance" of the plover exclusively (or even significantly) to off-leash dogs. The data do not support this conclusion. It follows, therefore, that addressing off-leash dogs only will not effectively protect the plover. We maintain, based upon the data, that proper protection of the plover would encompass the effect of humans, predators, and other wildlife as well.

The GGNRA Refuses To Implement Any Other Measures To Protect The

Plover

Leashing of dogs (or the banning of dogs) on a 2.2 mile stretch of Ocean Beach is not a rational, measured response to the plover's seasonal presence on approximately 0.4 miles of Ocean Beach, and it does not address the hazards that both humans and predators present.

Peter Baye (U.S. Fish and Wildlife Service Biologist) noted the presence of the Snowy Plover, which roosts, but does not nest, on Ocean Beach, and made recommendations to the GGNRA for its protection. The plovers are present seasonally and relocate from year to year. Mr. Baye recommended: "Exclosures, in concert with educational signage, have been very effective in areas of concentrated usage where beaches are large (e.g. Cape Cod National Seashore). There are no unique impediments inherent at San Francisco's Ocean Beach which would render these measures infeasible here. They should be implemented at least on an experimental full-scale basis." (Memo to USFWS, 15 March 1995). Rather than establishing these flexible, seasonally rotated exclosures to protect plovers against humans, pets, and wild predators, the NPS chose the fixed and narrow measure of (illegally) banishing off-leash recreation, and now has chosen to ban dogs entirely. Mr. Baye's recommendation of a temporary, seasonal fence to be removed when the plovers leave the area and repositioned when they return could still be adopted. This solution would allow off-leash dogs on Ocean Beach but keep dogs out of the roosting area. Better yet, Mr. Baye's solution would protect the plovers from the predators, campers, runners, children, kite-flyers, etc., who now invade the roosting area under the GGNRA's current and proposed plan in this DEIS. Mr. Baye's recommendation clearly shows that off-leash recreation on Ocean Beach is compatible with protection of the Snowy Plover. The GGNRA has refused to consider the option of constructing a fence to protect the Ocean Beach plovers.

The GGNRA has made no concerted effort to alleviate the activities that are currently prohibited by law, pose a hazard to the plover, and occur in the vicinity of the plover's roosting. Table A, below, summarizes the current GGNRA record of citations for fireworks, littering, camping, and beach fires on the portion of the beach where the snowy plover may roost. On an average Saturday or Sunday morning in the area the plovers roost you will find (by personal report):

? 5 beach fires (3 unattended) ? 7 campsites (2 had fires)

Extrapolating, if only weekend offenders were cited, there should have been 520 citations/year for fires, and 720 citations/year for camping. The GGNRA's dismal record of enforcement is reflected below in Table A. Moreover, it should be pointed out that litter is generally left at camp sites and the sites of beach fires. This litter attracts ravens and other predators to the area where the plovers are potentially roosting. The number of citations for littering is grossly

inadequate. 1

If the GGNRA is unable to utilize enforcement to protect the plover from the public and their activities, it would make a great deal of sense to provide the exclosures as a refuge for the plover as suggested by Mr. Baye.

1 In an article published in The San Francisco Examiner; September 26,2005; by Marisa Lagos; entitled "Residents Irked by Ocean Beach Parties" (please refer to the original online version located at:

<http://www.sfexaminer.com/articles/2005/09/27/news/20050927neOIfIres.txt> or a nonline.printable copy located at:

<http://OceanBeachDOG.home.mindspring.com/GGNRAOceanBeachNonEnforcement.htm>), it is confirmed that the GGNRA's failure to enforce fire and litter policies has led to untold damage in the GGNRA's arbitrarily designated snowy plover habitat at Ocean Beach.

In addition, dead wildlife such as seals, sea lions and birds are not being promptly removed from the beach. The rotting carcasses of these dead creatures are left indefinitely on the beach to attract ravens and other plover predators. Recently, a carcass of a cow washed up on Ocean Beach where it sat for almost a week before officials removed it. The dead body was literally covered with ravens, ripping and eating the dead animal's flesh.

The GGNRA Has No Protocol For The Rescue Of Injured Or Sick Birds Or Mammals In The Park

The response of Federal officials to the oiling of wildlife after the Cosco Busan oil spill was slow and inadequate in the eyes of the citizens who live in the communities affected. However, to those of us who frequently utilize GGNRA properties for recreation, the poor response came as no surprise. Below are my personal notes from my conversation with a GGNRA Wildlife Ecologist regarding my attempted rescue of a bird that morning-sent by email to OBDOG members Thursday September 13, 2007:

Bill Merkle

Dispatch # 415-561-5505

Acknowledges it is unfortunate there are no signs for the public to be advised as to whom to call if a bird, marine mammal or other wildlife is injured or requires assistance.

GGNRA will not necessarily make every attempt to help an injured bird should you bring it to their attention. It will depend upon three factors: 1) type of bird 2) type of injury 3) location of bird

If it is a shorebird (a common bird), they are much less likely to help. He was noncommittal as to what injuries they would address. As to location, if I bring the bird to their personnel, what is that all about? It was explained to me that if the injury occurred in an undeveloped area, then they would be unlikely to rescue the animal or bird. When asked whether Ocean Beach was developed or undeveloped, he said the parking lot would be developed, but the beach would be undeveloped. He went on to explain that in undeveloped (natural) areas, they allow nature to take its course. Disease is a natural process, and predation is a natural process. As for letting nature take its course, what about dogs chasing birds is not natural? I asked how the GGNRA rationalizes that a dog chasing a common shorebird warrants a ticket (we must protect park resources), yet if the same shorebird is brought to them because it is injured, they are satisfied to let it die? I asked then why is it that since they choose (and I believe erroneously) to define dogs as predators of birds, why are they then not considered part of the natural process at the beach and ignored just like every other predator?

He responded that if they received a report that a dog was attacking an injured bird they would most certainly respond. He advised me the GGNRA considers dogs to be an unnatural part of the park as they are associated with human use of the park (which is also by inference an unnatural intrusion into the park areas). Those of us who thought this park was created for our recreational use had better get used to the idea that the Park Service regards us as unwelcome intruders into their "wildlife protection area".

I went on to point out to him that I did not want to hear him defining dogs as predators or complaining about dogs attacking birds as my dog helped me rescue this bird this morning and has done the same numerous other times. My dog has alerted me to hypothermic birds that are still alive, and he won't leave until I pick them up and take them to safety. My dog will chase off ravens that are attacking an injured bird who is unable to effectively defend itself and actively chase those ravens away while I pick up the injured bird. Earlier this year we rescued a grebe, today it was a common shorebird. I told him I cannot just run by when an injured bird is actively being attacked by ravens and is screaming for help. He didn't have a lot to say in this regard.

The GGNRA claims the purpose of limiting the activities of dogs and their guardians is to "protect the resources" of the park. What resources exactly is the GGNRA protecting? The same resources you are content to let die because you don't care to make the effort to transport injured birds to WildCare in San Rafael? When I asked why they would not transport every injured bird brought to them for care, Mr. Merkle indicated the GGNRA preferred to "manage habitats and work on population levels". I am afraid to contemplate exactly what that means, except that the fallow deer in Marin probably have a pretty good idea. Or perhaps it means they want to work on limiting our human population levels in the Park. Or both.

I am disgusted by the hypocrisy of the GGNRA yet again. Their record of park management policy is abysmal. They neglect to assist injured birds even when they are brought to them, they are slaughtering over a thousand deer in Marin merely because they are non-native.

The proposed rule which sacrifices recreational access to protect the plover cannot be justified when GGNRA management has failed to implement the most basic of plans to ensure their well-being.

In this DEIS the GGNRA mentions their concern for wildlife including marine mammals, especially when they beach themselves to rest or when they are injured and on the beach. The GGNRA seems to be able to count the number of reports of beached mammals they receive, however what they fail to mention is that they have no protocol for the visitor to the GGNRA to follow should they come across a marine mammal on the beach. I personally have made numerous requests to GGNRA management for signs to be placed at the beach which would instruct visitors not to approach the beached mammal and where to call to request assistance for the animal. Many visitors to the GGNRA are not local, some have never been to a beach before, and they require instruction so that they can assist the animal effectively. Oddly enough, the GGNRA has managed to post signs up and down the beach to advise us of recreational restrictions regarding fires, camping and the plover, but they cannot post educational signs to benefit marine mammals.

The GGNRA Condoned Other Disturbances To The Plover

To further compromise the GGNRA's argument that the restriction of off-leash recreation is necessary to protect the plover, the GGNRA has taken the plover's alleged summer hiatus as an opportunity to begin bulldozing of the "Plover Protection Area". In October of 2005, when United States Fish and Wildlife Service (USFWS) declined to designate Ocean Beach as critical habitat for the plover they stated the following:

"Although we do not consider these areas [Ocean Beach and Crissy Field] essential for recovery, we do consider them important, and will continue to review projects in these areas that might affect wSP as required by sections 7 and 10 of the Act." The USFWS is previously on the record as stating, "Activities that may adversely affect plovers include sand deposition or spreading, beach cleaning, construction of breakwaters and jetties, dune stabilization/restoration using native and nonnative vegetation or fencing, beach leveling and off-road vehicles driven in nesting areas or at night."

Ocean Beach Plover Protection Area (July 31, 2007)

The picture above was taken during the period when dogs are restricted at Ocean Beach due to the presence of the plover. When OBD OG principals first observed

the bulldozers in the Plover Protection Area below, we made a Freedom of Information Act Request of the GGNRA, to determine the purpose of the bulldozing, as well as determine whether USFWS had approved this drastic action. The GGNRA responded to our request, but failed to answer our questions about the bulldozing. We were later advised verbally that there was no correspondence with USFWS to obtain approval for bulldozing, as the plover was not then present. Internal GGNRA records show the GGNRA bargained with USFWS in 1996, sacrificing our off-leash recreational opportunities in order to get USFWS to agree to allow bulldozing in this same area of Ocean Beach. The ESA is very clear that it is not permissible to modify the habitat of an endangered or threatened species when they are not present, but expected to return. One example would be the prohibition of the removal of trees that hold an eagle's nest, even when the eagle is not present or utilizing the nest.

We understand the GGNRA is modifying the beach in this area to minimize the effects of erosion and the drifting of sand on to the Promenade and Great Highway. The GGNRA has refused to acknowledge in any significant fashion that erosion and the progressive collapse of the shoreline limits the areas where the plover can roost and forage, as well as the quality of food source for the plover at Ocean Beach. The narrowing beach puts the plover in closer and closer proximity to all users of the beach, thereby increasing the disturbance to the plovers. These conditions will progress despite the GGNRA's move to ban dogs entirely.

We agree the GGNRA needs to deal with erosion at Ocean Beach. However, it seems unlikely that the GGNRA will admit the obvious: the erosion itself and the GGNRA activities designed to deal with erosion adversely affect the plover to a much greater degree than four dogs who allegedly "disturbed" plovers in the last six years. The restriction of off-leash recreation or the banning of dogs entirely to purportedly protect the plover is a complete ruse.

The photos above were taken during the time period when the dogs are restricted because the GGNRA claims the plover is present. We see the condition of the plover habitat after the GGNRA has bulldozed to minimize the effects of drifting sand and erosion. The dunes that remain are there because they do have a little beach grass to help hold them together. The tides have run up and behind the dunes that the GGNRA claims the plover inhabits. Note the excessive debris, the graffiti and the remnants of a Christmas tree in this so-called "habitat". Considering the plover resides on elevated dunes of dry sand, preferably without vegetation, it is quite apparent as to why Ocean Beach is not suitable plover habitat. It also underscores the absurdity of the claim in this DEIS that dogs digging have some responsibility for the undermining of sand dunes at Ocean Beach.

GGNRA personnel routinely drive off-road vehicles through the plover habitat in order to enforce the leash law at Ocean Beach. Certainly the GGNRA's

"solution" is far more dangerous to the plover than the perceived "problem" (pictures of this activity on file).

In 2006, the Fourth Annual Ocean Beach Turkey Trot was an event sanctioned by the GGNRA (and SFRPD) for 1000 participants. Certainly the GGNRA recognized there would be additional participants who had not officially registered. I and other members of Ocean Beach DOG who witnessed the race estimated 1500 participants. The course for the race was charted directly through the Snowy Plover Protection Area. This was also during a time period where the GGNRA declared an "emergency" warranting the restriction of off-leash recreation in this same area in order to minimize "disturbance" to the plover. The GGNRA, by granting permits for the Ocean Beach Turkey Trot, established that their ban of off-leash recreation is arbitrary, capricious and discriminatory- therefore unlawful.

The 2006 GGNRA Status Report For The Western Snowy Plover Is Fatally Flawed

This is the second report Daphne Hatch (Chief of Natural Resource Management and Science for the Golden Gate National Recreation Area) has produced for the GGNRA to justify the closure of most of Ocean Beach to off-leash recreation due to the transient presence of the Western Snowy Plover (WSP). The first was produced in 1996. The second report, dated November 2, 2006, is the subject of this analysis. Reading Ms. Hatch's report brings to mind an article I recently read from the Journal of the American Dental Association October 2006 Special Supplement. The article was entitled, "Challenges in Interpreting Study Results-The conflict between appearance and reality". It seems that the GGNRA and Ms. Hatch have endeavored to manipulate the data so as to reach a predetermined outcome. Their conclusions falsely give the reader the appearance that the threat to the WSP from off-leash dogs is great. The reality is there is no credible threat to the WSP from off-leash dogs within the GGNRA.

Bias: The 2006 Hatch report presents itself as an "observational study". Observational studies have the least reliability of any type of scientific study because their results can be distorted by many factors. The first of those factors is bias. Bias generally stated is a "systematic error in the design, conduct, or analysis of a study that results in a mistaken estimate of an exposure's effect on the risk a subject faces". Bias is the basis of our skepticism of research to determine the efficacy of a medication when the research is conducted by a clinician who stands to gain financially if the medication is shown to be effective.

Ms. Hatch clearly has an ideological bias against people and their dogs recreating in any manner at Ocean Beach. She was quoted on September 7, 2005 in the S.F. Chronicle as saying, "Ocean Beach without the people is an incredible

habitat. But people think of it as a sandbox or their backyard". This is an incredible admission from a high ranking GGNRA official considering the enabling legislation of the GGNRA.

Design: Daphne Hatch's bias is apparent in the design of this study. The objective of this study is to prove her assumption that the present management which allows off-leash dog use of Ocean Beach and Crissy Field is inadequate to protect the WSP from harassment/disturbance and other detrimental effects of chasing by dogs. We learn nothing about the relative harassment/ disturbance of the plover from any other source in this study. If plovers are harassed/ disturbed 50 times in 5.5 hours by ravens, and one time in that same time period by a dog, is the harassment/disturbance by the dog even relevant? A comparative study model would have been more informative with respect to actually determining what management actions, if any, should be taken to protect the plover from harassment/disturbance in general. Frankly, this comparative study should have been undertaken in 1993 when the WSP was first listed as a threatened species, before the decision was made (and later reversed by the Federal Court) to require the leashing of dogs to protect the plover. However, it could have been undertaken at any time. A comparative study is designed to remove one variable in a situation at a time, and observe the change, if any. An initial period of observation would document the presence of predators (ravens) and their numbers, as well as the frequency of harassment/disturbance from all sources absent any management action. Next, the predators (ravens) being the most serious source of potential disturbance/harassment are removed as much as possible. Rather than killing all the ravens, the GGNRA could have begun a campaign to reduce and remove litter at the beach as a conservative method to reduce the number of ravens. This would entail aggressive ticketing of those who are observed leaving litter at the beach, and resources would be deployed to clear the beach of litter and dead wildlife daily. No one would be adversely affected, and in fact most beachgoers would welcome a cleaner, safer beach. Indirectly, the lack of litter/foodstuff for the ravens would have been expected to reduce their numbers. After the new management practice has been implemented for a reasonable period of time, a second period of observation is conducted. In this second data collection period, we could assess whether the litter reduction has reduced the number of ravens, and has the reduction in ravens reduced the frequency of harassment; disturbance to the WSP. If the ravens are not reduced, or the frequency of harassment/ disturbance is still unacceptable, the next management measure is implemented. Enclosure fencing could have been placed in the areas where the WSP is observed roosting. This would serve to provide some protection for the WSP from the ravens and any other predators, as well as humans and dogs. Education of the public to give the enclosure fencing a wide berth would be appropriate. After a reasonable period of implementation, a third period of observation would be conducted to determine what effect, if any, this latest management method had upon the frequency of harassment; disturbance of the WSP. There also should be the implementation of an aggressive ticketing policy for all dog owners whose dogs

were observed chasing plovers at some point within this process. All of these management measures should have been implemented and assessed for their effectiveness in reducing the frequency of WSP harassment/disturbances before a leash restriction or banning dogs was even considered. This would have been consistent with the mandate to maintain recreational opportunities in the GGNRA.

Conduct: This study exhibits bias in its conduct as well. Clearly, the participants who performed the surveys either had a pre-existing bias to construe the activity of dogs as harassment, or the training provided by Daphne Hatch and her staff created that bias in the participants. Most likely it is a combination of both, as those individuals who volunteered to do these surveys are identified as Golden Gate Audubon Society members. (We should point out that the Golden Gate Audubon Society is on the record as opposing any off-leash recreation in the GGNRA). Ms. Hatch, in her introduction, spells out the definition of harassment per the Endangered Species Act (ESA). Harassment is "an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding or sheltering". Ms. Hatch seems to use the terms harassment and disturbance interchangeably in this report, so we will generally refer to it as harassment/disturbance.

Harassment/ disturbances are not well defined in the portion of the study where they are enumerated for Ocean Beach. However, in the Crissy Field portion, there is more description provided for the harassment/disturbances observed. In one case, harassment;disturbance of a plover by a dog was described as "alert posture -stood up and increased vigilance" (in other words, the plover lifted his head up and looked around). Compare this "disturbance" that was classified by a volunteer and the authors of this study as an incident of harassment to the definition of harassment as provided by the ESA. They are clearly inconsistent. In this study, the authors and participants classified activity as harassment/disturbance that does NOT meet the definition of harassment provided by the ESA. This is a classic example of examiner bias in the conduct of this study. This is more precisely identified as "misclassification" and serves to invalidate the data collected and conclusions drawn in this study.

Analysis: Analysis of this data is compromised because the data itself is in question. Another factor that makes analysis of this data practically impossible is "confounding" in the design of this study. In this case, "confounding" refers to the fact that this study is not designed to isolate the effect of each component of the beach environment that can affect the plover adversely. For example, an off-leash dog is running at the waterline with its owner and they are some 20 feet from a plover. There is additionally a raven 30 feet and closing from the plover. The plover flushes, and it is recorded as a "disturbance". How is it apparent to the observer whether the dog, the owner or the raven was the source of the disturbance? Practically, it could be any combination of all three. Based upon the premise of this study, it is reasonable to assume the disturbance/harassment

would be attributed to the off-leash dog. Is that legitimate? There does not appear to be any attempt made to isolate all other activities within the Park that may adversely affect the plover-they are merely given mention. These would include: Beach patrols in vehicles on the beach, equestrian use of the beach, people walking or jogging, kite flying, littering which attracts predators, the predators (usually ravens) themselves, and removal of kelp or driftwood which are sources of food. No mention is even made of bonfires, camping, litter such as cigarette butts, or the shadows surfboards cast.

Correspondence ID: 4675 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Perhaps the most egregious omission in this report is that there is no mention made of beach width. The beach width at Ocean Beach has been decreasing due to erosion. Daphne Hatch's 1996 report concluded on page 10: "Factors other than the number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach". The GGNRA is quite aware that the number of plovers on Ocean Beach is not directly related to the number of people or dogs present on the beach. However, in this 2006 Daphne Hatch report there is some discussion on page 8 that the plover numbers have leveled off since 2003, and have never matched the level they reached of 85 in 1994. Concurrently, this report discusses repeatedly that since the reinstatement of off-leash recreation, the number of dogs at Ocean Beach has increased dramatically. The report directly asserts the increase in dogs at Ocean Beach is responsible for a greater number of plover disturbances and it is inferred indirectly responsible for the diminished number of plovers. Had Daphne Hatch been intellectually honest, she might have drawn the following conclusion from this data and a study she cites in this report, "Disturbance to wintering western snowy plovers", by K.D. Lafferty. This Lafferty report states "The distance between human activity and the roost peaked at about 30 meters and relatively few people or dogs beyond this distance disturbed plovers" ... presumably because a narrow beach increased the potential overlap between beach users and snowy plovers". Ocean Beach suffers from serious erosion, and hence the beach width has narrowed dramatically, especially during high tides. It could more reasonably be concluded that the narrowed beach width is directly responsible for both the lower plover numbers and the increased frequency of perceived harassment/disturbance of the plover, not the greater number of dogs or their activities on or off of a leash. The narrowed beach width has both eliminated much of the potential habitat for the WSP at Ocean Beach (this is consistent with USFWS critical habitat designation in 2005), and forced all occupants of the beach into closer proximity to the plover, thereby perhaps causing greater harassment/disturbance levels (especially if you construe lifting your head

and looking around as a disturbance). How great are the harassment/disturbance levels really? The way the data is presented in this report is misleading. To put the data in its' simplest form, in 2004 when dogs were required to be on-leash at Ocean Beach, one dog was observed harassing/disturbing a plover in 5.5 hours of observation on weekdays, and one dog was observed harassing/disturbing a plover every 2.5 hours on the weekends. In 2005, when dogs were legally allowed off-leash on Ocean Beach, (and there were many more dogs present) 1 dog harassed/disturbed a plover in 2.4 hours of observation on weekdays, and fewer than 2 dogs harassed/disturbed a plover every hour on weekends. Is this really significant? This report gives us no data regarding the rate of disturbance from any other source, however, the number of ravens far exceeds the number of dogs out at Ocean Beach, and it can easily be postulated the harassment/disturbances due to dogs are dwarfed by the number of harassment/disturbances from the plover's natural predator, the raven.

It is difficult for me to do further analysis of the data, because the GGNRA has illegally withheld the raw data from me. In April of 2006, I requested, by means of a Freedom of Information Act request, all of the data/reports/Environmental Assessments the GGNRA had to substantiate their claim that there were resources in the Park that required protection. The GGNRA responded in writing that such data did not exist. Based upon the representations made in the November 2, 2006 Memorandum from Daphne Hatch and GGNRA Head Ranger Yvette Ruan, the last of the data for this report was collected in February and March of 2006. The data could and legally should have been provided to me in April of 2006. I subsequently appealed this FOIA request to the DOI, and it has not been acted upon despite the fact that the time allowed by law for response has long since expired. The DOI tells me I can sue them for it.

Conclusion: Rational analysis of the situation would suggest that the GGNRA is really not trying to solve a problem. The GGNRA is merely interested in restricting dogs to leashes or banning dogs entirely throughout the GGNRA. Additionally, when taking into account Ms. Hatch's above comments to the S.F. Chronicle in 2005, one must question the future of both humans and dogs in the GGNRA. Taking into account the data regarding the numbers of dogs chasing either shorebirds or plovers in context of the frequency of the behavior over time, it seems ticketing of the miniscule number of offenders would be appropriate rather than punishing all for the transgressions of a very few. It is a bit like forcing all cyclists in the GGNRA to ride with training wheels because a very few speed through the park.

If GGNRA management complains that they do not have the resources to adequately police Ocean Beach then it provides an appropriate reason to move for reversion of this property. I remind you again of Rolf Diamont's

(GGNRA Environmental Coordinator circa 1975) conclusions when the GGNRA had just accepted possession of Ocean Beach from the City of San Francisco-"Ocean Beach: no rules should be enforced here. Ocean Beach is too large and too accessible to control dogs. It would be a logistical nightmare for the Park Service to try".

The Hatch report does not meet the criteria for a valid scientific study. It is more appropriately classified as "junk science" - "a publication that has the tone and trappings of science, but is so fundamentally and demonstrably flawed as to lack any serious claim to credibility". Junk science should never be used as the basis for establishing public policy.

The GGNRA Ignores Scientific Studies That Do Not Serve Their Purposes

1) Our first example would be a U.C. Berkeley Environmental Sciences study presented by Megan Warren on May 7, 2007 that concludes within the GGNRA that the feeding of the Western Snowy Plover does not appear to be negatively affected by human and pet recreation. This is highly significant. Because the WSP does not breed at Ocean Beach or Crissy Field, its primary essential activity is foraging and feeding. If human and pet recreation does not negatively affect those activities, there is no need to restrict recreation in these areas. The abstract is as follows:

Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover

Abstract The Western Snowy Plover (*Charadrius alexandrinus nivosus*) is a small shorebird that has many scattered wintering populations along the Pacific Coast of the United States, including several in the Bay Area. This species has been listed as threatened since 1993 under the federal Endangered Species Act of 1973. For this study I measured disturbance rates, types, plover responses and feeding time in three different sites in the San Francisco Bay Area to explore the link between recreation disturbance and feeding behavior. I predicted that as frequency of disturbance increased, the birds would spend less time actively foraging and more time alert. However, data showed no significant relationship between feeding behavior and direct disturbance by human recreators. Instead, I now predict that recreation has a more indirect effect on the western snowy plover feeding behavior. Future research should focus on indirect effects of recreation, such as habitat disturbance and food source quality.

2) Our second example is a study, "Predicting the population consequences of human disturbance for Ringed Plovers *Charadrius hiaticula*: a game theory approach" by Durwyn Liley and William J. Sutherland. This study originates from the School of Biological Sciences, University of East Anglia, Norwich, Norfolk NR4 7TJ, UK. This study clarifies the following

three pertinent facts:

? Sites that are highly disturbed are not used by breeding birds, and therefore any increase in disturbance levels on these sites will not alter population size ? No published study of a breeding bird quantifies the population consequences of disturbance. This is despite the fact that disturbance has been implied as a factor causing population decline for a wide range of species. ? We think of individuals [birds] as deciding not to breed rather than being prevented from doing so. Such individuals 'queue' for good quality territories rather than adopting a poor quality territory (such as Ocean Beach).

3) The third study originates from the School of Biological Sciences, University of East Anglia, Norwich, Norfolk NR41fJ, UK., and was authored by Jennifer A. Gill, published in *Ibis* (2007) 149(SuPPI. 1),9-14. It is entitled, "Approaches to measuring the effects of human disturbance on birds".

This study clarifies a concept that helps to explain the apparent inconsistency of plover behavior at Ocean Beach and Crissy Field. On one hand, Ocean Beach is a highly disturbed, poor quality beach area (in large part due to erosion). Crissy Field is another highly disturbed beach environment at which the plover does NOT feed or breed (per the first study listed here). The GGNRA maintains that the plover is highly susceptible to disturbance by humans and off-leash dogs. This is why the proposed Rule has been promulgated. However, one must ask the question: if the plover is highly disturbed by human and canine off-leash recreation, and the plover does not feed at Crissy Field, why are any plovers there at all? Likewise, although the food source may be a bit better at Ocean Beach, why would the plover choose to roost there and endure the disturbance?

This study opines, "The principal way in which human presence can impact upon wildlife is by altering the ability of animals to exploit important resources. This can operate either through directly restricting access to resources such as food supplies, nesting sites or roosting sites, or by altering the actual or perceived quality of these sites. Direct restriction of access to resources can occur through animals avoiding areas where humans are present. Changes in the quality of sites as a result of human presence could occur, for example, if predators were attracted to areas with humans, or if the presence of humans reduced the presence of prey species."

For the plovers observed roosting at Ocean Beach and Crissy Field, humans and off-leash dogs are not restricting their access to resources because the plovers are indeed there. The second alternative is that humans and off-leash dogs are altering the actual or perceived quality of these sites. The most logical conclusion is the presence of humans and their off-leash dogs

reduces the presence and/or activity of prey species. This theory has been brought up by others such as the SF SPCA (Objections to the Federal Government's Ban on Off-leash Dogs at Ocean Beach, Jan. 9, 1997, page 4), but was summarily dismissed by the GGNRA wildlife biologists. It is disturbing that the subsequent 2006 Hatch study at Ocean Beach intentionally ignores gulls, ravens and crows entirely, so there is no data available that might confirm the presence of off-leash dogs may protect the plover from birds of prey.

However, the statistics in Daphne Hatch's own 1996 study support this theory. During the period prior to this study, the number of plovers at Ocean Beach was increasing, even though there was no requirement for dogs to be on-leash. The maximum Snowy Plover counts for the 1979 to 1985 period ranged from 4 to 16, compared to maximum counts (since 1988) of from 38 to 85 birds (Hatch Report, p. 8).

This UK study also evaluates the methodology of studies like the 2006 Hatch study, which attempt to assess the distribution or behaviour of animals in the presence or absence of disturbance. "A limitation of these types of approaches is that the numbers of animals that would use these sites in the absence of disturbance is generally not known. For example, if the sites with higher levels of disturbance also have lower levels of resource availability (e.g. food or nest-sites) or higher risk of predation, then removing the source of disturbance may have no effect on the numbers of animals in the area."

In actuality, because it is acknowledged by the GGNRA that removal of off-leash dogs or banning will not increase the number of plovers at Ocean Beach, the question becomes, will the restriction of dogs decrease the number of plovers at Ocean Beach? There is evidence to confirm this is probable, as a similar scenario which involved the Bank Swallow has already occurred in the GGNRA--in an area directly adjacent to Ocean Beach, i.e., Fort Funston. This will be discussed in a subsequent section devoted to Fort Funston.

4) The fourth study was peer-reviewed and accepted on November 12, 1999, and published in *Biological Conservation* 97 (2001) 265-268. The authors are Jennifer A. Gill, Ken Norris and William J. Sutherland. The study is entitled "Why behavioural responses may not reflect the population consequences of human disturbance".

The authors contend, "The effect of human disturbance on animals is frequently measured in terms of changes in behaviour response to human presence. The magnitude of these changes in behavior is then often used as a measure of the relative susceptibility of species to disturbance; for example, species that show strong avoidance of human presence are often considered

to be in greater need of protection from disturbance than those which do not ... By contrast, species which do not avoid disturbed areas are often considered as requiring little or no protection from disturbance...From a conservation perspective, human disturbance of wildlife is important only if it affects survival or fecundity and hence causes a population to decline."

What becomes clear after reading this study is that in the GGNRA, Daphne Hatch is defining avoidance behavior and what constitutes a "disturbance" in a very different manner than do other researchers. (This is consistent with my criticism of the 2006 Hatch study). According to this study, avoidance behavior or moving constitutes an activity where the plover actually leaves the site. The 5, 10 or 20 foot flight Daphne Hatch is utilizing as her most severe evidence of disturbance may be relevant in breeding/nesting areas, where movement of that scale can take a plover away from its nest and eggs. In the circumstance where plovers are roosting in an area, this is not classified by other researchers as a "disturbance". From the perspective of these authors, the plovers roosting at Ocean Beach and Crissy Field require little or no protection from disturbance because they stay at these sites.

The Latest Study Of The Western Snowy Plover In This DEIS Is Fatally Flawed

This DEIS relies in large part upon a study by Matthew Zlatunich and Michael Lynes of the Golden Gate Audubon Society. This new study, like the Warren study, was conducted in cooperation with the GGNRA. As noted previously, this 2011 DEIS again fails to mention a 2007 study by Warren that found plovers' feeding was not negatively impacted by recreational activities of humans and dogs. This is critically important because the plover does not nest or breed at Ocean Beach or Crissy Field; its' primary activity here is feeding and foraging for food. Instead of acknowledging the Warren study, the new Zlatunich-Lynes study was conducted in 2009/2010 at Crissy Field in San Francisco. This study exhibits many of the scientific shortcomings noted in previous studies:

? This study was merely an observational study ? The observational collection of data was performed by Audubon volunteers who had a bias-the GGAS has publicly advocated the banning of dogs to protect the plover ? This study made no attempt to ascertain comparative effects on the plover. There is no discussion of the disturbance level perpetrated by other sources, even though they tell us that data was collected ? Raw data is not provided to the reader ? The analysis appears to be biased because it is based upon incomplete data. For example, the level of disturbance is not categorized in the analysis even though we are told they were categorized in their collection. ? Assumptions are made in this analysis without supporting explanation. For example, they decided to assign the disturbance to an on-

leash dog if he was closer to the plover than his guardian. This ignores the possibility the disturbance was due to the number of bodies, e.g. two people walking would disturb a plover to the same extent as a leashed dog and a person.

To clarify the issue of comparative disturbance, it seems odd that although known predators of the plover are acknowledged to be at Crissy Field, no attempt is made to analyze the disturbance they create for the plover. The Common Raven and American Crow are present, yet ignored in the analysis. Beyond this, the California Gull is noted as being present. This is of interest because a recent study using surveillance cameras at plover nesting sites in San Francisco Bay documented California Gulls as being responsible for 25% of all predation of plover nests. (Robinson-Nilsen, Caitlin¹, Jill Bluso Demers¹, Cheryl Strong², and Scott Demers³; ¹ San Francisco Bay Bird Observatory, crobinson@stbbo.org; ² U. S. Fish and Wildlife Service, Don Edwards San Francisco Bay National Wildlife Refuge; ³ HT Harvey and Associates DETERMINING THE EFFECTS OF HABITAT ENHANCEMENTS AND PREDATORS FOR WESTERN SNOWY PLOVER). California Gulls are new to some of these areas—could the decline in the number of plovers at Crissy Field be related to an increase in the presence of California Gulls? This study makes no attempt to ascertain if there is any such correlation.

The Zlatunich-Lynes study notes the number of plovers has been steadily declining since 2005/2006 records. They choose to rely upon previous conclusions that the greatest disturbance impact to wildlife within the Wildlife Protection Area at Crissy Field is caused by dogs, joggers and walkers. The data from this study showed the number of dogs and humans in the plover area spiked in 2008/2009, and declined dramatically in 2009/2010. The number of plovers continued to decline, despite the reduction in recreational disturbance in 2009/2010. This could lead one to conclude that there is no correlation between the number of dogs and people and the number of plovers present. There is no discussion of this possibility in the data analysis of this study.

The Zlatunich-Lynes study is without merit because it deliberately misleads the reader about the GGNRA's legal obligations to protect the plover. Ocean Beach and Crissy Field are not designated as critical habitat by the USFWS. Therefore, the GGNRA is obligated only to prevent the harassment or taking of the plover within its boundaries. Appendix B contains the legal definition of a disturbance which would constitute harassment and be a violation of the law: "If the observer witnesses a blatant violation of the law, such as a dog owner knowingly and without regard allowing his dog to harass wildlife, the observer shall make note on the comment sheet and shall, upon completion of the survey, file a wildlife harassment report at the park police station..." There is no indication in this study analysis that any observer EVER

witnessed this type of harassment of a plover during their observations.

Alternatively, the Zlatunich-Lynes study records "disturbances" which they define as minor, moderate and major-none of which rise to the level of the legal and accepted definition of harassment that is utilized by USFWS and other studies. For example, the Zlatunich-Lynes study states: "a minor disturbance will cause a resting bird to stand". A clear thinking individual can conclude that a minor "disturbance" as defined by this study is really no disturbance at all. Worse yet, when analyzing the number of "disturbances" observed, there is no acknowledgement as to how many of these "disturbances" are actually minor, moderate or major based upon these authors' criteria. It is entirely possible (and I believe probable) that each of the disturbances recorded and utilized to justify the restriction of recreation were merely minor "disturbances". This would be consistent with the conclusions of other studies including the following which states: "... snowy plovers in other areas have become habituated to relatively constant and non-threatening human trail use." (Trulio, Lynne¹, Caitlin Robinson-Nilsen², Jana Sokale³ and Kevin Lafferty⁴ San Jose State University; Lynne.Trulio@sjsu.edu; ²San Francisco Bay Bird Observatory; ³Sokale Environmental Planning; ⁴Western Ecological Research Center, US Geological Survey NESTING SNOWY PLOVER RESPONSE TO NEW TRAIL USE.)

In summary, the Zlatunich-Lynes study and its recommendations are flawed, dishonest and biased. The DEIS advocates recreational restrictions based upon this study. Clearly, the failure in this study to find any violation of the law with respect to the protection of the plover, and the omission of studies that contradict the need for recreational restrictions should render this aspect of the DEIS invalid and discredit the conclusion that recreational restrictions must be implemented to protect the plover in the GGNRA.

The Western Snowy Plover At Crissy Field

This DEIS proposes to ban dogs from large areas of Crissy Field to protect the Western Snowy Plover. It is especially disturbing to note the lack of "vital signs monitoring" in this location because there was a full evaluation of the potential environmental impacts of canine recreation when the renovation of Crissy Field was first proposed. This was a perfect opportunity to obtain a baseline monitoring survey and follow through annually to monitor the effects of the originally permitted levels of recreational activity. Instead, you will see that the citizens were advised the recreational interests would be compatible with the renovation just until the renovation was completed. Then off-leash recreation was banned without environmental study. The recent study relied upon within this DEIS has been reviewed in the Ocean Beach section, but it fails entirely to meet

standards the NPS sets forth for "vital signs monitoring" .

"The 1988 Crissy Field Site Improvement Assessment evolved from concepts present in the 1980 General Management Plan. The Crissy Field plan recommends native planting, preservation and enhancement of the site's natural qualities, and preservation of views of the bay while recognizing the needs of existing and future visitors." (Final General Management Plan, Amended Environmental Impact Statement, Presidio of San Francisco, July 1994, p. 5.)

Public concern over the impact of the plan on recreation surfaced in 1994. Wind surfers and dog-walkers were concerned that the new Crissy Field proposals did not address future use of the area for these recreational activities. On November 28, 1994, the Crissy Field project team met with representatives of boardsailors and Rich Avanzino, then President of the SF SPCA, to discuss "the direction [they] were going." (USPRODoo684.)

Meanwhile, the GGNP A encountered problems obtaining donations for the project because of these concerns. Toby Rosenblatt was responsible for raising funds on behalf of the GGNP A for the restoration project. He became alarmed in 1994 upon discovering that NPS officials were not honoring the "voice control" 1979 Pet Policy established when the City donated Park lands to the GGNRA. In December 1994, Mr. Rosenblatt wrote a letter to Superintendent O'Neill and Presidio Manager Robert Chandler, protesting reports that Rangers and Park Police were approaching people in the Presidio, Crissy Field, Upper Fort Mason and Ocean Beach "telling them about a leash law and enforcing the law." Mr. Rosenblatt disagreed with the change in enforcement and warned "[i]t will raise a very major reaction, as you know, in the community and will seriously impact relations with lots of people". He also noted that the enforcement was impacting fund raising efforts for Crissy Field: "I know that a change which implements such a law will hurt our fund raising efforts for Crissy and elsewhere -in fact that is beginning to happen already." Copies of the letter were sent to Greg Moore, Executive Director GGNPA, and Amy Meyer of the GGNRA Citizens Advisory Committee. (USPRODoo694.)

Nevertheless, the NPS refused to include off-leash recreation in official plans for Crissy Field.

In February 1995, Richard Avanzino met with Superintendent O'Neill, Presidio Manager Chandler and GGNPA Director Moore in order to address concerns "about the continued lack of official acknowledgment and recognition for this vital recreational activity." In a letter summarizing these discussions, Mr. Avanzino noted that the NPS was refusing to provide official recognition because federal regulations require dogs to be leashed, and many NPS staff and powerful environmental groups who want a

wetlands established at Crissy Field are opposed to off-leash dogs. NPS also threatened to retaliate if dogwalkers pushed for official recognition during the planning process: "[I]f we advocate publicly for official recognition and status, our efforts will be frowned on and may well be greeted with retaliatory action." The SF SPCA responded by demanding official recognition: "We want the National Park Service to officially acknowledge and preserve off-leash dog walking as it exists today at Crissy Field. We want this acknowledgment to be reflected in the legal and other documents pertaining to Crissy Field, as well as in the official design plans for the site." Copies of the letter were sent to Senators Feinstein and Boxer and Representatives Pelosi and Lantos. (USPRODoo666-7.)

Public pressure continued to build. On March 28, 1995, a public debate over the issue of a wetlands and its potential impact on off-leash dog-walking was held at the Commonwealth Club. A flyer for the lecture, entitled "Wetlands at Crissy Field -Is this a Good Idea?" identified the speaker as James F. Kirkham, Advisory Partner, Pillsbury Madison & Sutro, Native San Franciscan and Outdoorsman." Summarizing the issue up for debate, the flyer noted: "this habitat could include up to half of the entire acreage of Crissy Field, which could drastically reduce the amount of space left for recreational activities, including off-leash dog exercise." (USPRODoo681.) A few days later, on April 1, 1995, a massive Presidio "dog-in" was held to show support for off-leash dog walking at Crissy Field. (USPRODoo679-80.)

In April 1995, Mr. Avanzino met with Superintendent O'Neill and Citizens Advisory Commission members Amy Meyer, Jacqueline Young, and Trent Orr to discuss the status of the 1979 Pet Policy and the issue of inclusion of officially designated off-leash areas in the Crissy Field Plans. A letter memorializing the meeting indicates the following issues were resolved:

1 The "NPS will again honor the Pet Policy"; 2 "Legal counsel for the NPS has advised" that the Superintendent has "discretionary authority to reinforce through the Compendium mechanism the principles expressed in the Pet Policy"; 3 "This is permitted even though there is some conflict with the Code of Federal Regulations" ; 4 The NPS agreed to include "site-specific plan that clearly delineates off-leash dog walking areas"; 5 The NPS agreed "to public review and participation at the level of the Golden Gate National Recreation Area Advisory Commission of any future changes to the agreed upon off-leash dog walking areas." (Richard Avanzino letter to Brian O'Neill, April 27, 1995.)

To bolster fundraising for wetlands restoration at Crissy Field, the NPS announced (in the San Francisco Chronicle) that it "has no intent to forbid off-leash, even if a large wetlands area is restored along the northern waterfront...all plans either maintain or expand off-leash dog walking.

Under any future scenario, more generous areas of the Presidio's northern waterfront will be available to dogs." (Emphasis added.)

On October 2, 1996, the GGNRA issued a "Finding of No Significant Impact" ("FONSI") for the Crissy Field project. Included in this document were notes about the comments and concerns voiced during the Comment period for the Environmental Assessment ("EA"). The FONSI addressed these concerns as follows: "The Crissy Field Plan ...includes expanded opportunities for off leash dog walking, and the marsh design, as noted in the EA, incorporates features to avoid conflict between other recreational activities, such as off leash dog walking, and wildlife. Section 2.1.2.10 ("Dog Use Areas") provides: "Dog walking is a popular activity at Crissy Field, and both alternatives provide for the continued enjoyment of that activity. An approximately 70 acre area would be available for dog activities. Walking dogs off leash under voice control would be permitted on the Promenade and beach east of the U.S. Coast Guard station, on the restored airfield, and in the East Beach area." Indeed, the Crissy Field Plan Summary confirmed that the proposed plan includes 70 acres for "off-leash dog walking." (Id., p. 10) With respect to protected species, the issue of vegetation was also addressed in the FONSI as follows: "The decision to avoid the introduction of special status species in the restoration was made recognizing the high level of recreational use at Crissy Field anticipated to continue in the future and the concern expressed by many individuals that special status species could cause a change in management of the site that would restrict recreational uses." NPS did in fact replant the federally endangered California sea-blite (*Suaeda californica*) that drowned out during the prolonged inlet closures/non-tidal lagoon flooding phases, and some transplants are thriving. "

Thereafter, the \$35 million in funds were raised, the restoration completed, and subsequently, off-leash recreation was illegally banned at all GGNRA properties, and massive ticketing and harassment of dog walkers commenced. This directly violated the following agreements between the GGNRA and San Francisco: 1975 Memorandum of Understanding; 1979 Pet Policy; 1980 General Plan; 1982 GGNRA Natural Resources Plan; 1995 EIR/or the Crissy Field Plan, and the 1996 Compendium Amendment. The only redress for these actions by the GGNRA was for three citizens to spend ten of thousands of dollars of their own funds to defend themselves in a criminal proceeding challenging the tickets they were illegally issued. The GGNRA was found to have acted illegally when it rescinded the 1979 Pet Policy and began ticketing citizens for engaging in legal activity.

In this DEIS, the presence of these plantings as well as the Western Snowy Plover are utilized to justify the restriction of recreation in the area. The GGNRA has, yet again, violated the mandate under which this Park was created, violated its promises to the City, reneged on the promises made in

the FONSI, and made clear that this DEIS had a predetermined outcome to cutback off-leash recreation or ban dogs in areas used for this purpose before the Park ever existed. The failure of this DEIS to present any credible evidence which would support the restriction of recreation due to the presence of the plover has been discussed in detail in the Ocean Beach section of this comment.

The Bank Swallow At Fort Funston

Beginning in 1991, the GGNRA/NPS began destroying the Fort Funston ecosystem with the premise being protection of the California state-threatened Bank Swallow. The GGNRA/NPS maintained that that recreational activity and "exotic" plants were having a profound negative impact on the Bank Swallow. The GGNRA/NPS never conducted an environmental impact analysis or vital monitoring as required by Federal law before beginning this ecological destruction.

For decades, the Bank Swallow population had been thriving at Fort Funston, with their population increasing steadily even as off-leash dog walking was legally permitted and visitor use increased. In 1982, there were 229 burrows, 417 in 1987, and 550 in 1989--providing anecdotal evidence that dogs and Bank Swallows co-exist and thrive.

In October 1991, the GGNRA/NPS closed approximately seven acres at Fort Funston by moving fences designed to protect the Bank Swallow 75 to 100 feet away from the cliffs in order to construct native plant habitats. (Milestone, J. "Just a Swallow Habitat Restoration Project".) By early 1992, almost four acres were converted to coastal dune and chaparral. At that time, NPS staff began chain sawing twenty-four (24) Monterey Cypress trees lining a trail leading to the beach, and volunteers pulled up erosion-preventing ice plant. Bulldozers were used to level hillocks and bury concrete slabs. In the course of only a few months, volunteers replaced ice plant with 5,000 native plants in the four acre area. The entire seven acre project was designed to take five years to complete with only 75% coverage of plants. The goal of the project was to increase "natural" erosion and create "moving sand" ecology. With the closures at Fort Funston, the GGNRA/NPS embarked on a unilateral course that was illegal under its own management policies, the MOU Agreement with the City, and the GGNRA enabling statute. At Fort Funston, the GGNRA/NPS pursued a strategy of repressing dog-walking each time it expanded its closures. Concomitant with the native plant expansion, Park Rangers began telling dog-walkers, in late 1991 and 1992, to leash their dogs. In May 1992, Mark Scott Hamilton, Chairperson for San Francisco Commission of Animal Control and Welfare, sent a letter to Superintendent O'Neill expressing concern over "NPS Ranger announcements that GGNRA's longstanding 'voice control' policy at Fort Funston was to be changed effective May 1." Mr. Hamilton pointed out that

such action would have serious impact on "overall dog-walking policies within San Francisco's geographic boundaries" and questioned how it could be done without public hearings: "It seems inconsistent with GGNRA's past policies (and perhaps violative of applicable regulatory law) that this change would even be contemplated until after public input hearings."

Public outcry over this action was overwhelming. In response, Western District Director Stanley Albright reassured both u.S. Senator Cranston and Senator Seymour that the GGNRA would continue to abide by the 1979 Pet Policy: "At this time, there is no change in the 1979 Pet Policy which [currently] provides the visitor the privilege of walking one's dog off leash."

Addressing public concern over the closures at a meeting that summer, Head Ranger Jim Milestone, in July 1992, assured citizens that the fences would be in place only one year and the native plants would be compatible with recreational use of the area. (Meeting Minutes of Fort Funston Dog Walkers Association, July 9, 1992.) The next year, GGNRA/NPS expanded the native plant habit an additional three acres beyond the initial seven acre project, again without public review or project approval.

In June 1994, an additional expansion/closure of fifteen acres was proposed without analysis or public hearings. The GGNRA report confirmed that the project was already "expanding into areas beyond our previously agreed to perimeter. Project originally called for removal of all ice plant (a noxious exotic species) from the ten acre Bank Swallow habitat area. This is now complete and new areas outside of Bank Swallow habitat area are now within our grasp." (Project Review Form, Ice Plant Removal, North Tip of Fort Funston, June 1994, emphasis added.) The project goal was to destroy 15 acres of ice plant, using chainsaws to destroy all "exotic" trees and bushes, and using bulldozers where possible. The map attached to this project limited the expansion to the asphalt coastal trail. In fact, this project also was "expanded beyond agreed perimeters" to encompass areas east of the trail, covering the entire Boy Scout Bowl.

In 1995, Rangers began warning dog-walkers at Fort Funston, Crissy Field, and Ocean Beach that they were going to start enforcing the general leash regulation, 36 C.F.R. Section 2.1s(a)(2). At the same time, GGNRA/NPS announced plans to close ten acres adjacent to Battery Davis under the pretext of erosion control. Ranger Jim Milestone admitted to the public at a meeting in March 1995 protesting the proposed closures that this area was very popular with children for playing Lawrence of Arabia on the steep slope. Dogs loved to chase balls and frisbees at the bottom of slope.

Following these closures, by letter dated March 14, 1995, Superintendent O'Neill promised Richard Avanzino, then-President of the San Francisco SPCA, that the habitat was nearing completion and would not expand south.

The GGNRA/NPS also promised that the Battery Davis closure was an approximately 5-year closure during which time it would be revegetated. Signs indicating both areas were closed for native plant revegetation were subsequently placed along the affected areas.

After four years of closures of areas adjacent to the Bank Swallow burrows to off-leash recreation and vegetation revision, in 1995 the number of Bank Swallow burrows plummeted from 924 to 713. A simple review of the scientific literature confirms that Bank Swallows are very tolerant of "human disturbance" at nest sites. Indeed, "many colonies are in human-made sites ... such as sand and gravel quarries and road cuts." (Garrison, B., "Bank Swallow," *The Birds of North America*, No. 414 (1999), at p. 6.) Mr. Garrison is a California Department of Fish and Game

Biologist and an expert on the Bank Swallow. In fact, the only GGNRA/NPS study to evaluate the dramatic drop in numbers of the Bank Swallow concluded that increased predation, not recreational activity, was negatively affecting the birds. (Chow, N., "1994-95 Bank Swallow Annual Report", US04906-32.)

In 1996, the GGNRA/NPS failed to document the colony size, and claims to have lost all data for 1997. In 1998, the number of burrows had dropped to 140, and the GGNRA/NPS closed off the entire slope of coastal bluffs below the hang gliders.

In 1998, the Bank Swallow colony fled the "Bank Swallow Protection Area," to the "exotic" ecology and recreational activity along the south cliffs of Fort Funston. As a general rule of survival, birds leave areas where they are under stress. Despite the obvious devastation to the Bank Swallow colony, the GGNRA/NPS failed to analyze the impact of unleashed dogs on controlling predators of the Bank Swallow. (Hatch Report, p. 85, lines 10-16.) NPS Head Ranger J. Milestone indicated the dogs might have protected the Bank Swallows by impacting the weasel population. (US03944.) Additionally, observations indicate that the very habitat the GGNRA/NPS was destroying was the habitat most suitable for the Fort Funston Bank Swallow. Such observations confirm that ice plant rootlets are used by Bank Swallows to construct nests. (US04062-3?)

In January 2001, the NPS closed twelve additional acres to public use and the Bank Swallow colony again fled further south away from the new closure.

Because of a total failure to study causal effects of various activities on the Bank Swallow, the GGNRA/NPS has no evidence linking recreational activity with the Bank Swallow decline at Fort Funston. Indeed, the best evidence that recreational activity does not impact the Bank Swallow

negatively is the swallows' departure from the fenced off northern cliffs to their present location --an area of continuous recreational activity. The overwhelming evidence indicates that the GGNRA/NPS native plant projects have negatively impacted the Bank Swallow colony.

In fact, NPS documents confirm that Bank Swallow experts do not agree with the NPS/GGNRA contention that the creation of native plant "flyover" habitat is necessary for the Bank Swallows. Notes of a March 16, 2000 phone conversation with Barry Garrison from the California Fish & Game Department, one of the nation's foremost experts on California Bank Swallows, confirm that he "doesn't feel need flyover" (USPR001625) "doesn't necessarily agree that they need a flyover to persist." (USPROD01624). William Shields, Professor of Biology at SUNY, elected fellow of American Ornithologist's Union, leader of SUNY's Conservation Biology concentration (in letter to GGNRA re: closures at Fort Funston, October 2000), reiterates the Bank Swallow's tolerance of human and pet presence and their lack of appreciation for "native plants." "The poor arguments presented in their (GGNRA) plans make little sense to me. The Bank Swallow like other swallows is quite suited to live with humans and their pets" and " ... I do not understand or condone what I believe are their misrepresentations about the needs and safety of the Bank Swallows breeding in the cliffs. ... the notion that the swallows would do better by having more species of insects or even more insects on the shortflyway between their breeding burrows and their main foraging sites at the nearby lake is a major stretch and smacks of special pleading to me."

The GGNRA's dune conversion destroyed the Bank Swallow colony nesting site that the birds had used since 1905.

GGNRA/NPS officials have consistently maintained that after some five years, these "habitat" areas would be reopened for public use. Five years have passed for many of these closures, yet to date, no fences have been removed.

This DEIS contains no "monitoring of vital signs" that could possibly justify the actions taken previously or the actions proposed in the Preferred Alternative at Fort Funston to limit recreation of people and their dogs. The science, limited as it is, would indicate the Bank Swallow would benefit from the entirety of Fort Funston again being accessible for off-leash recreation as it was in the 1979 Pet Policy. Instead, this DEIS moves to further restrict recreation of people and dogs to presumably "protect" the Bank Swallow. A legitimate safety mitigation would be planting a bramble-type shrubbery barrier along the cliffs, so as to deter dogs and small children (neither of whom can read warning signage) from the cliff edge and preclude accidental falls off the cliffs for all park users.

This DEIS Promotes The GGNRA Practice Of Perverting The Endangered Species Act To Restrict Recreation

Historically, one avenue for eliminating access to the public—the recovery of endangered and threatened species—has been extensively utilized by GGNRA management. This explains the GGNRA's repeated treatment of any habitat, no matter how deficient, as critical habitat. An example of this would be the "plover protection areas" at Ocean Beach and Crissy Field. This DEIS proposes to ban dogs at these areas which is a management restriction more severe than is often employed in "critical habitat". Although for a time the GGNRA attempted to mislead the public by calling this area "crucial habitat", the fact of the matter is that term that has no legal significance. What is significant is that these areas are NOT critical habitat, therefore management measures are legally limited to preventing "harassment" of the plover at that location. Banning dogs is a restriction that is not commensurate with the observed activities in these areas with respect to the plovers.

Additionally, in this DEIS, the NPS designates areas as "potential habitat". The NPS treats "potential habitat" (build it and they will come) as if it were "critical habitat" and embraces all legal restrictions that would enure from that status. An example of this would be at Mori Point in Pacifica. At Mori Point the GGNRA chose to remove 2/3 of the property from recreational access in order to create potential habitat for the red-legged frog and San Francisco garter snake. The GGNRA treats this "potential" habitat as if it were "critical" habitat (which it is not) with respect to recreational restrictions.

The GGNRA has also embarked on a mission to create native plant habitats where no habitat previously existed. GGNRA management alleges this is a part of their obligation to "preserve" the park for future enjoyment, however, this is NOT what they are doing. When you read the overview for Fort Funston, it is abundantly clear that they are creating these native plant habitats, and in doing so they are destroying parts of the park that existed long before the GGNRA took control. This process is not preserving anything. Additionally, this is in violation of their authorizing directive, as the establishment of native plant areas requires the exclusion of humans from the site, eliminating all recreational activity in the area. Closures at Fort Funston were conducted without a NEPA required environmental impact analysis with regards to recreation or the Bank Swallows, without proper project approval, and without public hearings in violation of NPS regulations, U. S. Department of Interior management policies, and federal law. The GGNRA has implemented similar closures at Baker Beach, Lobos Creek, and in the Presidio. Concerned citizens were unable to obtain specific vegetative plans for the Presidio. Eventually plans to cut down approximately 4,000 trees in order to plant a native "vinegarweed" came to

light and were opposed vigorously.

Lastly, the GGNRA has utilized this DEIS to ambush recreation in areas where the public agreed to "restoration" to enhance the environment for "sensitive" species with the promise that recreation would be able to co-exist with these species when the project was complete. The conclusion in the Environmental Review for the Redwood Creek/Muir Beach "restoration" stated:

"The preferred alternative will have short-term minor adverse impacts on visitor and resident access to Muir Beach by contributing to traffic congestion. With the implementation of the mitigation measures, the intensity of these adverse effects will be reduced to a minor level. In addition, the overall effect of the project is beneficial and will improve resident/visitor access and recreation opportunities. Implementation of the Preferred Alternative would not impair park visitors or residents."

The project has been completed, and this DEIS now bans dogs from Muir Beach (they were allowed here off-leash before). Residents/visitors do not see the ban as an "improvement of recreation opportunities as previously promised".

GGNRA Usurps Authority Of The State Of California In This DEIS

The GGNRA intends to ban the recreational activities of dogs and their guardians upon the tidelands that are adjacent to GGNRA beaches. These tidelands remain subject to State "public trust" uses and may not have their longstanding recreational usage turned into purely conservation areas without violating State law and the terms of the permit under which the GGNRA manages some of these tidelands. The GGNRA's position that the public trust doctrine goes into "dormancy" while it manages these tidelands is without any legal support. The 1987 permit specifically allows for enforcement of federal regulations on these State-owned tidelands only to the extent they are not inconsistent with State law. The "public trust" doctrine has been significant State law since California's admission into the Union in 1850. The general recreational uses of these tidelands are not subject to federal rulemaking of any type.

Compliance Based Management Strategy

The 2,400 plus page GGRNA Draft Environmental Impact Statement (DEIS) purports to offer its proposed alternative (almost everywhere on leash or no dogs at all) and then several alternatives. However, buried deep within the document is the GGNRA's Compliance-based management Strategy-a poison pill, which itself demonstrates that the alternatives are

illusory -nothing more than a default to the GGNRA's desired change:

"In order to ensure protection of resources from dog walking activities, the dog walking regulations defined in action alternatives B, C, D, and E would be regularly enforced by park law enforcement, and compliance monitored by park staff. A compliance-based management strategy would be implemented to address noncompliance and would apply to all action alternatives. Noncompliance would include dog walking within restricted areas, dog walking under voice and sight control in designated on-leash dog walking areas, and dog walking under voice and sight control outside of established ROLAs.

If noncompliance occurs, impacts to resources have the potential to increase and become short-term minor to major adverse. To prevent these impacts from increasing or occurring outside of the designated dog walking areas the NPS would regularly monitor all sites. When noncompliance is observed in an area, park staff would focus on enforcing the regulations, educating dog walkers, and establishing buffer zones, time and use restrictions, and SUP restrictions. If compliance falls below 75 percent (measured as the Executive Summary xiv Golden Gate National Recreation Area percentage of total dogs / dog walkers observed during the previous 12 months not in compliance with the regulations) the area's management would be changed to the next more restrictive level of dog management. In this case, ROLAs would be changed to on-leash dog walking areas and on-leash dog walking areas would be changed to no dog walking areas.

This change would be permanent. Impacts from noncompliance could reach short-term minor to major adverse, but the compliance-based management strategy is designed to return impacts to a level that assumes compliance, as described in the overall impacts analysis, or provide beneficial impacts where dog walking is reduced or eliminated"

The entire concept of "compliance based management strategy" is one that has never before been utilized in any other National Park or National Recreation Area by the NPS. The Draft Plan/DEIS states (page 1725) that "the compliance-based management strategy is an important and effective tool to manage uncertainty when proposing new action" and "has been created" to assure successful implementation and long-term sustainability. It appears this policy attempts to allow the implementation of future restrictions without public notice and comment. This is unlawful and should never have been included in this DEIS.

It is clear that regardless of whatever alternative is finally selected by the GGNRA, the end game for them is the complete removal of off-leash recreation in the GGNRA as well as the banning of dogs entirely from most, if not all, of the GGNRA. At this point we are once again reminded of the

revealing statement made by now NPS Director Jon Jarvis: "[would rather give up those [the GGNRA] properties than have dogs running loose on them. "

In summary, in recent interviews GGNRA representatives have stated that they are forced to ban dogs entirely in many of the former GGNRA off-leash areas provided by the 1979 Pet Policy because, "We do not have the resources to enforce voice control or on-leash compliance ... ". However, it seems to be no problem for them whatsoever to fund staffing resources, expensive surveillance cameras, etc. when it comes to dispensing their "poison pill".

This DEIS (and GGNRA Policy in General) Punishes The Disabled

The disabled are given no special consideration by the GGNRA/NPS. As stated by San Francisco City Attorney Louise Renne (in a letter dated December 19,2000):

"In addition to receiving numerous complaints regarding the closures at Fort Funston, members of the Board of Supervisors have been contacted by members of the public protesting the removal of pavement from the Sunset Trail, which was closed in November 1999 and reopened in March, 2000. Organizations such as the Golden Gate Senior Services have complained that a major portion of the trail is no longer paved and is therefore inaccessible to persons with limited mobility. We are writing to request a written response from the GGNRA explaining how this diminution of recreational opportunities is consistent with the GGNRA's responsibilities under the Section 504 of the Rehabilitation Act of 1973 (9 U.S.C. 794). Please include in your response a description of the GGNRA's plan to make its programs accessible to persons with disabilities, including those with mobility impairments".

The Sunset Trail is still closed to the public (including those with disabilities), and the Preferred Alternative would restrict more of the trails the disabled might possibly access at Fort Funston to recreate with their dogs.

At Sweeney Ridge in Pacifica stands the Portola Monument, considered to be the most historic site in the GGNRA. When the GGNRA took control of this property, it closed the access road off to cars, thereby preventing the disabled or mobility impaired from accessing this site. The hike from the current parking spot is 2.5 miles to the Monument, with an elevation rise of some 1,000 feet. The GGNRA has made no legitimate effort to remedy this situation, despite complaints from the City Council in Pacifica, and groups representing senior citizens. This DEIS further restricts access to this

portion of the GGNRA.

Perhaps the best indicator as to how badly the GGNRA treats the disabled in this National Recreation Area is the lawsuit brought by Disability Rights Advocates against the GGNRA several years ago. According to the suit, the federal recreation area is discriminating against people with disabilities by systematically excluding them from such areas as restrooms, visitor centers, historic sites, trails, pathways. One of the plaintiffs attorneys explained that at the Marin Headlands, the visitor center has a ramp, "but to a third-party evaluator, it was so steep as to be inaccessible and dangerous. Alcatraz offers a tram, but it only holds two wheelchairs ,they just don't have the capacity. At Muir Woods, one of our plaintiffs has had problems with paved trails. GGNRA hasn't kept the paved trails in a condition that allowed her to use them."

Federal laws since 1973 have obligated Golden Gate National Recreation Area to provide reasonable accommodations for persons with disabilities. Having to hike 2.5 miles to see Portola's Monument may be inconvenient for the average citizen, but it is impossible for an individual with a physical disability. The Sweeney Ridge/Portola Monument situation is a representative example of how when making decisions regarding access the GGNRA always chooses less access. The judge in this litigation sent both parties out to mediation, yet after a time the parties were sent back to the court as there was a complete failure to come to any workable conclusion. Therefore, it cannot be asserted the GGNRA did not recognize the problem- the reality is that the GGNRA has no intention of remedying the problem, unless forced to by the Court. This DEIS is consistent with this pattern of practice.

Environmental Justice

The issue of Environmental Justice, as it is postulated in the DEIS (P.31), is offensive at best. To claim that ethnic minorities are dissuaded from visiting the park because dogs are present is a perversion of the data. None of the 20 or more recommendations in the study about what the GGNRA could do to increase accessibility by minorities includes banning or restricting dogs.

The study was flawed in that it was a small sample of non-randomly selected people who were largely unfamiliar with the GGNRA (only 1/3 had visited at least one GGNRA site in the past year). This creates a situation where you are obtaining opinions about the GGNRA from people who have not experienced the GGNRA to any significant degree. You are likely only measuring their perception of the GGNRA, not what actually occurs there. The responses obtained from this study might be well suited to establishing a public relations campaign for the GGNRA, but not establishing park

policy.

The study itself says the goal of the study is to "realize the park goals of understanding how to improve 'connecting people to the parks' and how best to engage under-represented communities in plans and programs"-it was a public relations survey. What the study overlooks is that dog walking connects all different kinds of people to the parks. Had the subjects in this survey been to Fort Funston or Crissy Field recently they would have seen a wide diversity of people --seniors, kids, disabled people, Asian-Americans, African-Americans, Latinos, Pacific Islanders, all there with dogs. Compare that mix to any other GGNRA park activity (with nowhere near the diversity) and the "we have to restrict dogs to protect ethnic minorities" argument appears misguided and somewhat condescending.

Respondents who did visit the GGNRA express no apparent problem with dogs recreating with people. A quote from P-42 of the SF State study: "I go to the beach ... When I look at the ocean I could totally relax and let my imagination run wild. I feel that life in America is truly wonderful when I watch people fishing, jogging, playing and walking their dogs."

An interesting observation: the GGNRA talks about protecting access for ethnic minorities who don't come to the GGNRA, but hypothetically might come to the park if there were changes. Who will protect access for the ethnic minorities who DO come to the park to enjoy off-leash recreation?

Suffice it to say that Environmental Justice would appear to be a specious argument at best for restricting the access of people with their dogs in the GGNRA.

Protection Of The Cultural Resources

The idea that cultural resources such as buried missile silos at Fort Funston require protection from dogs trampling, digging or urinating is far-fetched at best. I would point out that the larger size and weight of humans would be a greater threat to trample notable sites than would dogs. With respect to missile silos at Fort Funston I would not assume all urine deposited would be that of the canine visitors. The GGNRA still has not installed any permanent bathrooms for the many human visitors at Fort Funston. In fact, it seems the GGNRA has little regard for the enjoyment of these resources.

I would also point out the GGNRA has failed miserably in their restoration efforts for facilities such as the Cliff House which are within the Recreation Area's boundaries. The new facility is quite unaesthetic, and popular restaurants within have been altered and have lost their popularity. I have talked to many visitors who are familiar with the previous incarnations of the Cliff House. They always express their disappointment and/or outrage as

to its boxy appearance with the service entrants in the most visible area. There used to be a line down the hill for the Sunday brunch at the Cliff House, now it is empty. Our cultural resources are in far greater danger from GGNRA management and their "restoration" plans than they are from dogs.

Safety In The GGNRA The DEIS states: "Most of the issues related to the health and safety of park visitors are related to their encounters with unruly/aggressive dogs". The actual Law Enforcement citations were obtained and catalogued by interested dog guardians and the chart below is the result of their careful analysis. As you can see, the incidents involving unruly or aggressive dogs comprise only 2 percent of the total incidents Law Enforcement reported in the GGNRA. Remarkably, these bite/attack incidents only occurred once in every 1.36 million park visits. 93 percent of the time, Law Enforcement was dealing with human-specific incidents. Clearly this issue of park safety for visitors and staff being compromised because dogs are present has been entirely overblown to justify the radical recreation restrictions the GGNRA is promoting in this DEIS.

Another safety issue brought up in the DEIS is dog feces. It is disturbing that the GGNRA brings up a multitude of diseases or health risks associated with dog feces, yet provides no statistics about disease contracted by people from dog feces. It is my understanding the data to support this "potential" risk is nonexistent.

A related topic in this DEIS is the extensive maintenance dog areas require. For example, statistics are provided for the high cost of trash removal at Ocean Beach. As a daily visitor to Ocean Beach, I must point out the vast majority of the trash is not dog-related, but people-related. I have not as yet seen groups of dogs huddled around beach fires drinking and eating for hours, or groups of dogs enjoying a beach picnic. It is unfair to allocate excessive maintenance costs for trash removal to dogs. At Fort Funston, the complaint is that they must empty trash more often because it is heavy due to the large volume of dog feces. It seems dogs, and their guardians cannot win in this DEIS. On one hand, they are accused of failing to pick up dog feces, and on the other hand the GGNRA complains the trash receptacles are heavy because of all the dog feces in the trash!

In reality, the safety issue with respect to dogs is a disingenuous argument at best. GGNRA management has sacrificed safety of the public repeatedly when safety comes into conflict with their "restoration" agenda. For example, the GGNRA was happy to spend over a million dollars at Mori Point to construct a bridge so that frogs could migrate from their current habitat on property outside the GGNRA to the "potential habitat" the GGNRA had spent another million dollars to create at Mori Point. Previous to the construction of the bridge, the frogs would have been required to cross the emergency access road for Sharp Park and Mori Point. In building

this bridge, the GGNRA destroyed the original access road. Consequently, there is no direct way for emergency vehicles to get out to these popular public properties should there be an emergency.

With respect to management in the GGNRA, their high cost discretionary projects (e.g., the \$12 million spent by the GGNRA to create the new Giacomini Wetlands in Marin, the aforementioned bridge to nowhere at Mori Point always take precedence over everything else most notably public safety. Budget cuts enforced by the GGNRA in spring 2008 cost nearby Presidio Fire Station NO.2 the use of their ambulance, and could have made the difference between life and death for a woman found hypothermic at Rodeo beach by a maintenance worker.

Correspondence ID: 4676 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Water Quality In The GGNRA

It is interesting to review the water quality findings in this DEIS. Although it is asserted dog feces are a significant component in water bacterial contamination, once again the DEIS is short on facts and misleading as well. The DEIS refers to a substudy of the San Francisco Sewage Master Plan which determined that bacterial contamination of waters off Ocean Beach was significant due to dog fecal matter deposited along the shoreline (NPS 1999, 21). The difficulty with this reference is that it cannot be located. It does not exist.

What I find much more relevant is the Annual Report by Heal the Bay. This year's report just came out and Ocean Beach receives an A+ ranking at Balboa Avenue year-round excepting a B ranking during wet weather. At Lincoln Avenue there is an A or A+ ranking year-round excepting a B ranking during wet weather. At Sloat, the ranking is an A or A+ all year-round in wet or dry weather. Clearly dog feces are not creating a problem at Ocean Beach. Further, the 2010 Heal the Bay report acknowledged that in the summer nearly all beaches had a clean bill of health. But in the winter, when heavy rains cause untreated sewage to flow into the bay and ocean, bacteria hit perilous levels in some areas. Deb Self, Director of San Francisco Baykeeper said, "We have a massive, rampant problem with human waste." Among the worst offenders is Baker Beach, where raw sewage leaking from old pipes and overflowing storm drains flows into Lobos Creek and forms a pool at the south end of the beach.

Clearly, most dog guardians are picking up their dogs' feces, and the relatively few instances where people fail to pick up after their dog, while

not excused, do not constitute a threat to our water quality.

Effect Upon Surrounding Parks

This DEIS fails to meet NEPA requirements by omitting an analysis of the effects of the proposed change on park properties in the cities and counties where the GGNRA now owns large swaths of recreational resources. However, when reading the DEIS, it seems pretty clear what the effect would be. From the DEIS itself: "High numbers of incidents occur because of the large number of people that use the site at one time, and the high number of dogs off-leash at the site." Certainly the GGNRA would acknowledge that this is precisely what will happen to parks outside the GGNRA should they close down 90% of the GGNRA's off-leash acreage as the Preferred Alternative would do. This is an unacceptable outcome.

I would also point out that the City and County of San Francisco has an ordinance (San Francisco City and County Health Code; Article I; Section 41.12; Paragraph (c); Subparagraph 5) that, among other things, requires dog guardians to provide their dogs with adequate exercise to maintain muscle mass and appropriate weight. Therefore, the issue of whether or not to exercise dogs when access has become severely restricted is not optional. Dog guardians will be forced to do what they have to in order to comply with San Francisco law.

This Agency Action Will Not Resolve Litigation

In recent history, litigation has been the only recourse the taxpayers have had to combat this abuse of power by the NPS/GGNRA. And, in fact, the NPS/GGNRA was forced to reinstate off-leash recreation in the GGNRA following a Federal Court order in 2005. Should the NPS/GGNRA proceed with any of the alternatives propagated in this DEIS, litigation to have this DEIS declared unlawful; or litigation by San Francisco to take back some of these properties will become a necessity.

Duty To' Preserve -This Agency Is Responsible For Resource Degradation

The greatest threat to the long term health of the GGNRA properties is the failure of GGNRA management to implement and use effectively a "Vital Signs Monitoring" program. Ecosystem changes GGNRA management has made until now to "preserve the resources" of the Park would not have been approved had a "Vital Signs Monitoring" program been utilized. The NPS / GGNRA has destroyed large areas of the Park in an attempt to remake the Park environment in the vision of a nativist ideology. These actions are in direct violation of the enabling legislation for this National Recreation Area. The DEIS' Preferred Alternative proposes additional changes purported to protect wildlife from harassment. The data indicates the unintended

consequences of ecological changes GGNRA management has implemented without the benefit of "Vital Signs Monitoring" have proven to be a far greater danger to wildlife than dogs. The scientific data presented in this DEIS does not adequately support the Dog management changes GGNRA management has made subsequent to the 1979 Pet Policy, or the changes they seek to make in any alternative proposed.

Conclusion

The only conclusion one can possibly draw from the evidence produced in this comment is that this DEIS along with its preferred alternatives and the compliance based management strategy are not based upon science or data, but rather the product of a predetermined outcome. I would expect no less from an agency whose top authority, Director Jon Jarvis, is on the record as stating, "I would rather give up those [the GGNRA] properties than have dogs running loose on them. "

After consulting with several knowledgeable legal resources, it is my opinion that this DEIS is unlawful, biased and so badly flawed, it must be thrown out. The GGNRA still has the ability to codify the original 1979 Pet Policy as a Section Seven Special Regulation. New lands should maintain the historical use upon inclusion and "vital signs monitoring" should be implemented to determine whether subsequent changes must be made to protect resources. Should the GGNRA fail to heed these recommendations, San Francisco City and County could remedy their issues by formally taking back their affected properties by enforcing their contractual reversionary clause. Unfortunately, this would be of little assistance to Marin and San Mateo counties. Therefore, it would be likely that those counties would pursue Congress to implement a Section Seven Special Regulation to ensure recreational access as was originally intended when this National Recreation Area was created. The third option would be to transfer the GGNRA to another Federal agency such as the Forest Service, where sound principles of land use and planning are a part of their management policy. Should these properties remain under the management of NPSjGGNRA, there must be strict oversight by Congress. Proper safeguards must be put in place to ensure that the sound principles of land use planning and management are adhered to by the GGNRA on a permanently basis.

Correspondence ID: 4677 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Introduction

The legacy of Golden Gate National Recreation Area (GGNRA)

management is one of duplicity, broken promises, and broken laws. This DEIS as a means to modify recreational usage is no exception. This DEIS is not a good faith effort by the NPSjGGNRA to resolve conflict, but a thinly veiled ploy to eliminate off-leash recreation from the GGNRA entirely. The conflict is actually one of legislative intent: the GGNRAjNPS desire to manage this Golden Gate National Recreation Area as a National Park, while the enabling legislation and the will of the people assert the management should reflect the unique requirement we have for recreational access (as mandated by Congress) here in the GGNRA.

With respect to this 2400 page DEIS, the Federal Register states: "This plan will promote the following objectives: preserve and protect natural and cultural resources and natural processes, provide a variety of visitor experiences, improve visitor and employee safety, reduce user conflicts, and maintain GGNRA resources and values for future generations." There is no mention of recreation or its value in this Recreation Area. With the addition of a "Compliance-based Management Strategy" the GGNRA has cleared the way to incrementally eliminate the presence of dogs in the GGNRA.

This is a long-standing battle we have waged; the GGNRA takes away recreational access, and the citizens turn to the Federal Court to have access reinstated. It has been a colossal waste of time and money, and a hardship for the citizens because not only are we battling for our right to access; we are also paying for both sides of the debate. I intend to review the objectives and content of this DEIS and the history of the management of the GGNRA. At its conclusion I think you will agree there are only three possible resolutions to this situation. San Francisco City and County will be required to formally take back those properties they can, or Congress will be required to implement a Section Seven Special Regulation (over the objections of DOIjNPSjGGNRA) to ensure recreational access as was originally intended when this National Recreation Area was created. The third option would be to transfer the GGNRA to another Federal agency such as the Forest Service, where sound principles of land use and planning are actually implemented as a part of their management policy. Should these properties remain under the management of NPSjGGNRA, there must be strict oversight by Congress to ensure sound principles of land use planning and management are implemented permanently as they have not been implemented up until now.

This Agency Action Is Unlawful

Before examining the contents of this DEIS, I must make the fundamental point that the decision to proceed with this DEIS itself is unlawful. The enabling legislation requires the GGNRA to utilize sound principles of land use planning and management. Accepted practice would be illustrated by the Rattlesnake National Recreation Area and Wilderness (RNRA W) which produces an annual monitoring report. The report assesses current recreation

trends, needs, and impacts, and thereby serves as a tool for long-term management of the RNRAW. The following is taken from the Introduction of the Report for 2009:

"This is the seventeenth annual monitoring report for the Limits of Acceptable Change (LAC) based Management Direction for the Rattlesnake National Recreation Area (NRA) and Wilderness (RNRA W), which was approved in December 1992. Monitoring is the final step in the LAC planning system. It is an ongoing, continuous process and is instrumental for evaluating management effectiveness and sustainability of resource values and conditions.

The LAC process recognizes that wilderness conditions change. Wilderness areas are dynamic systems with many forces continually affecting the landscape. These forces of change include people and their impacts, fire, insects and disease, invasive species and many others. It defines what conditions are desirable and how to achieve or maintain those conditions. Based on citizen involvement, laws and regulation, it identifies what changes are acceptable rather than attempting to prevent change.

Monitoring is based upon the indicators and standards outlined in the LAC direction. The indicators and their specific standards provide methods of measurement to effectively monitor factors and area wide issues. Refer to the December, 1992 Limits of Acceptable Change Based Management Direction for the RNRA W for a more complete discussion of the LAC process.

The factors monitored during the 2009 field season include: education, use and users, trails and roads, Wilderness characteristics, vegetation, vandalism, wildlife, fire, goals and policies. Refer to Table 1 for a complete description of the factors, indicators and standards for each opportunity class (OC)."

In contrast, in 2006 when this DEIS was announced on the Federal Register, I made a Freedom of Information Act Request to provide the data, documents, and/or Staff Report which substantiated the GGNRA's claim that there was controversy over the dog policy, compromised visitor and employee safety and resource degradation which warranted this DEIS. The GGNRA's response merely stated: "The Staff Report and other documents you seek do not exist at this time". An appeal to the Department of the Interior regarding this FOIA request elicited the following response after several letters: "Since the Department has not made a determination on your appeal within the time limits set in the FOIA, you may seek judicial review under 5 U.S.C. 552(a)(4)(B). However, we hope that you will delay filing the lawsuit so that the Department can thoroughly review the issues in your appeal and make a determination. We appreciate your patience to this point and the Department will make every effort to reach a decision on your appeal

as soon as possible." This letter is dated August 8, 2006. There has been no written response as of yet.

The lack of data or any documentation to support the assertions used as justification to proceed with this Environmental Review violates Federal Law as it renders this agency action arbitrary, capricious and an abuse of discretion. Accordingly, this agency action, findings and conclusions should be set aside as prescribed by the Administrative Procedure Act, 5 U.S.C. 706 (2)A.

Why is it significant that other Recreation Areas perform annual monitoring of resources and the GGNRA does not? Why is monitoring so important? As stated in an NPS publication, "Monitoring the Condition of Natural Resources in US National Parks" ([http://science.nature.nps.gov/lim/monitor/docs/Monitoring Park Condition. pdf](http://science.nature.nps.gov/lim/monitor/docs/Monitoring_Park_Condition.pdf)) the purpose of monitoring is as follows:

The overall purpose of natural resource monitoring in parks is to develop scientifically sound information on the current status and long term trends in the composition, structure, and function of park ecosystems, and to determine how well current management practices are sustaining those ecosystems. Use of monitoring information will increase confidence in manager's decisions and improve their ability to manage park resources, and will allow managers to confront and mitigate threats to the park and operate more effectively in legal and political arenas.

Additionally, a review of NPS online resources reveals that there is an entire infrastructure set up to guide and facilitate NPS properties in their monitoring duties, "Vital Signs Monitoring" (<http://science.nature.nps.gov/lim/monitor/index.cfm>)

A subsection of the aforementioned web site (Program Goals) discusses the goals of park monitoring: "Natural resource monitoring provides site-specific information needed to understand and identify change in complex, variable, and imperfectly understood natural systems and to determine whether observed changes are within natural levels of variability or may be indicators of unwanted human influences. Thus, monitoring provides a basis for understanding and identifying meaningful change in natural systems characterized by complexity, variability, and surprises. Monitoring data help to define the normal limits of natural variation in park resources and provide a basis for understanding observed changes; monitoring results may also be used to determine what constitutes impairment and to identify the need to initiate or change management practices."

As discussed above, it seems impossible that GGNRA management would undertake a management change as proposed in this DEIS without any

evidence of monitoring as a means to identify the alleged impairment. Further exploration of the NPS "Vital Signs Monitoring" Resources Online (see <http://science.nature.nps.gov/lim/monitor/ProgramGoals.cfm>) reveals:

National Park managers are directed by federal law and National Park Service policies and guidance to know the status and trends in the condition of natural resources under their stewardship in order to fulfill the NPS mission of conserving parks unimpaired (see Summary of Laws, Policies, and Guidance).

More recently, the National Parks Omnibus Management Act of 1998 established the framework for fully integrating natural resource monitoring and other science activities into the management processes of the National Park System. The Act charges the Secretary of the Interior to "continually improve the ability of the National Park Service to provide state-of-the-art management, protection, and interpretation of and research on the resources of the National Park System", and to "assure the full and proper utilization of the results of scientific studies for park management decisions." Section 5934 of the Act requires the Secretary of the Interior to develop a program of "inventory and monitoring of National Park System resources to establish baseline information and to provide information on the long-term trends in the condition of National Park System resources."

Clearly, the failure of GGNRA management to conduct any consistent monitoring of the resources of the GGNRA is a violation of Federal law. The more fundamental problem is that this DEIS highlights the fact that GGNRA management is in persistent violation of the enabling legislation for this park property. GGNRA management can provide no monitoring report to substantiate visitor use patterns or conflicts, no documentation of degradation of the Recreation Area resources, as well as no documentation as to whether resource degradation is inevitable or under the control of management prior to proposing these management changes. Consequently, there have been no mitigations to address problems as they arise. In truth, were the GGNRA's claims of degradation of resources even valid (I contend they are not), a case could be made that any degradation of the GGNRA property is due to GGNRA management's failure to adhere to accepted practice regarding land use planning and management. How is it equitable for the GGNRA to abolish recreational access as a remedy to a problem they cannot document and when they have demonstrably violated the principles of sound land use planning and management?

The fact is the National Park Service has had a shift in ideology, and this new ideology is in direct conflict with the promises the NPS made to citizens to persuade them and their governing bodies to turn over the properties that make up the GGNRA. Had the GGNRA monitored this property conscientiously, their findings would not have justified initiating this DEIS

in the first place.

This Agency's Management Is The Source Of Controversy And Conflict

It is the GGNRA's refusal to abide by the enabling legislation for this park that has created controversy and user conflict. I am obligated to go through a chronological history of the GGNRA because the history provided in this DEIS is inaccurate in many respects.

History

The historical backdrop presented in this DEIS could be politely classified as "revisionist". A more accurate description is as follows:

In March 1963, the President's Recreational Advisory Council released "Policy Circular No. 1." In it, the council laid out a new outdoor recreation policy for all agencies, with the key stipulation that all National Recreation sites be accessible at all times for "all-purpose recreational use." To make the point even clearer, it asserted that agency management of National Recreation Areas should be more responsive to recreational demands than to other such considerations as "preserving unique natural or historical resources." (Administrative History of Point Reyes National Seashore) The NPS was left with little choice but to heed these stipulations.

In response, the NPS advisory board decided to create three separate operating units and management goals for traditional NPS natural or Wilderness areas, Historical Monuments, and for the broad category of Recreation Areas. Secretary of the Interior Udall made official the new categories in his July 10, 1964, memorandum to new NPS director George B. Hartzog, Jr. Udall outlined the prescribed management policies for the recreational area category: "Outdoor recreation shall be recognized as the dominant or primary resource management objective." Resource use would emphasize "active participation in outdoor recreation in a pleasing environment." (Administrative History of Point Reyes National Seashore)

In 1970 Secretary of Interior Walter Hickel moved to create the GGNRA "to bring parks to the people", (U.S. Department of Interior News Release, September 14, 1970.) Congress established the GGNRA on October 27, 1972, stating:

"In order to preserve for public use and enjoyment certain areas of Marin and San Francisco Counties, California, possessing outstanding natural, historic, scenic, and recreational values, and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area (hereinafter referred to as the "recreation area") is hereby established. In the management of the

recreation area, the Secretary of the Interior (hereinafter referred to as the "Secretary") shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. In carrying out the provisions of this subchapter, the Secretary shall preserve the recreation area, as far as possible, in its natural setting, and protect it from development and uses which would destroy the scenic beauty and natural character of the area ... " (16 U.S.C. Sec. 460bb.)

In addition to a generic statement of purpose as appears in most national park statutes, it is important to note that Congress included two "specific provisions" unique to the GGNRA.

First, the park was established "to provide for the maintenance of needed recreational open space necessary to urban environment and planning."

Second, the GGNRA statute imposes a unique limitation on NPS's discretionary power for "management of the recreation area" by providing that the "Secretary of Interior...shall utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management. "

While composing a list of enumerated recreational activities contemplated for the new urban park would be virtually impossible, legislative history reveals what Congress meant by "needed recreational open space necessary to urban environment." "It is a well-recognized principle of statutory construction that contemporaneous interpretations of dated legislation are ordinarily given considerable deference when its meaning is later questioned." (National Rifle Association of America v. Potter 628 F. Supp. 903, 911 (D.C. Dist. Col. 1986).) In addition to sun bathing, picnicking, horse riding, swimming, hiking, and fishing, offleash dog walking was specifically addressed during Congressional hearings. For example, a letter by a seven year old child from San Francisco petitioned the Chairman for a dog park where she could play and socialize her dog: "Dear Congressman Roy Taylor: I want a park so I can play in the park and my sister wants a park too and so my dog can play with another dogs and my Mom wants a park so she could take my dog out to play. I hope you will make a park. Elizabeth Linke." (Hearings Before the Subcommittee on Interior and Insular Affairs, House of Representatives, p. 414.)

Consistent with the trend at the time, Congress explicitly stated the GGNRA was to be a "new national urban recreation area which will concentrate on serving the outdoor recreation needs of the people of the metropolitan region." The GGNRA's mandate was to "expand to the maximum extent possible the outdoor recreation opportunities available in this region." (1-1. R. Rep. No.

1391, 92nd Cong., 2nd Session (1972).)

At the time, all municipal beaches and adjacent city parks considered for inclusion in the park were dedicated to off-leash recreation. (It has been the law of the State of California since its inception in 1850 that the State holds the tidelands in trust for its citizens. In decisions from both the United States and California Supreme Courts, the uses encompassed by the public trust doctrine have been held to include "general recreational" activities.)

When voting for Charter Section 7.403-1(a) authorizing the transfer of the City parks, the citizens of San Francisco were told that "the transfer of these lands is a technical resolution allowing the City and County of San Francisco to transfer city lands to the Golden Gate National Recreation area ... a national urban park established in 1972 by Congress to preserve 34,000 acres of land and water in San Francisco and Marin for recreational use by all citizens." The first GGNRA Superintendent William J. Whalen made specific promises to San Francisco voters that the new NRA would retain historical recreational access (including off-leash recreation) should they vote to include SF park properties in the GGNRA.

Although the city was interested in having its parks included in the new urban park, it wanted to retain jurisdiction over them; surrendering total control to the federal government was not part of the original deal. San Francisco Mayor Joseph Alioto told the United States House Hearings that the city parks proposed for inclusion in the GGNRA "should remain under the jurisdiction of the San Francisco Recreation and Park Commission" (April 6, 1972). The Department of Interior clearly understood that the "taxpayers of San Francisco had the foresight to preserve these recreational areas and the willingness to pay for their support" and "naturally wish to retain some voice in their operations and administration consistent again with an overall master plan." (February 14, 1972). The San Francisco Recreation and Park Commission adopted Resolution No. 9030 which provides, "[t]hat this Commission, believing that inclusion of these properties is vital to the success of the concept of bringing parks to the people, recommends that they remain under the jurisdiction of the Recreation and Park Commission of the City and County of San Francisco." (May 30, 1972).

Aware that certain unique restrictions were included in the enabling statute requiring the NPS to maintain "recreational open space necessary for urban environment and planning", San Francisco adopted the "technical resolution" authorizing the transfer of City parks for "recreational use by all citizens."

The Board of Supervisors adopted Resolution No. 364-72, which provides:

1. "the City and County of San Francisco desires to maintain and improve

the recreation facilities available to the residents of San Francisco on the aforementioned property owned by the City and County of San Francisco located within the Golden Gate National Recreation Area;"

2. "The City and County of San Francisco desires to participate in the planning, administration and operation of the Golden Gate National Recreation Area;" and

3. "this Board of Supervisors endorse a policy of cooperation and administration and management of the Golden Gate National Recreation Area including the property owned by the City and County of San Francisco located within the Recreation Area. (June 9, 1972)".

Before the transfer occurred, an Agreement/ Memorandum of Understanding (MOU) between San Francisco and the Federal Government gave the City Planning Department jurisdiction to review NPS plans within formally owned City lands after their incorporation into the GGNRA. Department of City Planning memos from the 1970s confirm that the MOU requires that all NPS proposals be submitted to the Department for review.

As minutes of the San Francisco City Planning Commission, dated December 5, 1974 confirm, the resolution to transfer the property was approved on that day because the Commission was told: "the deed transferring jurisdiction over the parcel to the Federal Government would specify that the property should be used for Open Space and Recreational purposes only."

Even as the properties were being secured, the National Park Service was moving in the direction of abolishing the National Recreation, Historical Monuments, and Wilderness Management categories. The General Authorities Act of 1970 began the legal unraveling of the three management categories. Officials in Washington assured field operations that these changes were administrative and "not intended to create significant changes in the management of parks." (Administrative History of Point Reyes National Seashore)

But in reality, the move was being made to reverse the priority of recreation. We shall now track the progression of this move to place "preservation/restoration" over recreation.

Considering his representations to SF voters and elected officials, it seems duplicitous at best that in 1977 the same William J. Whalen (recently promoted to Director status in the NPS) officially dismantled the three-category distinctions which provided different management for National Recreation Area category properties (which included the GGNRA). To answer the obvious question as to how the priority of recreation was still to be honored, it was said the promulgation of new regulations were developed

to reflect "the actual Management practices which have become established in park areas, either through legislative requirements or policy decision." (Memo from Associate Director, Management and Operations to Directorate and Field Directorate, 12/22/77).

Congress bolstered NPS Director Whalen's decision to further de-emphasize the Recreational preference in the Redwoods Act of 1978, which included an amendment to the 1970 General Authorities Act declaring the "regulation of the various areas of the National Park System, ... shall be consistent with and founded in the purpose established by the [Organic Act] to the common benefit of all the people of the United States." (Administrative History of Point Reyes National Seashore)

Acting on the promise to the city and the mandate to manage park resources "consistent with sound principles of land use planning and management" for the "maintenance of needed recreational open space necessary to urban environment and planning", NPS developed the 1979 Pet Policy through the auspices of the Citizens Advisory Commission which designated certain areas for voice control in San Francisco and Marin counties. The development of this policy was initiated "because the ordinary guidelines outlined in the Code of Federal Regulations do not really apply in an urban area. People and their animals have been visiting the park for too long to apply an all-inclusive arbitrary policy."

Documents relating to development of the policy leave no question that NPS and not the Citizens Advisory Commission developed the off-leash policy for GGNRA. In October, 1977, Rolf Diamont, GGNRA "Environmental Coordinator" prepared a memo proposing a "Draft Dog Policy for San Francisco Unit." His memo enumerated the following guidelines:

1 "No regulation, verbal or written, should be attempted that cannot be reasonably and consistently administered."

2 "Dog regulations should be different for different areas of the park reflecting public needs and attitudes as well as urban geography and our capabilities."

3 "When we discourage or restrict dogs in any area, whenever possible, an alternative site where dogs are allowed should be suggested."

Each precept is consistent with "sound principles of land use management". To facilitate public review of the proposed policy, the Citizens Advisory Commission established a Pet Policy Committee to conduct hearings on the proposed policy. A briefing memo for the record prepared by the Staff Assistant to General Superintendent dated April 3, 1978 acknowledged that 36 CFR 2.8 leash law was "applicable to all properties of GGNRA". NPS

realized a special regulation would have to be prepared. "A deviation from this regulation will require the writing of a special regulation specific to GGNRA". The leash law was not enforced while the new policy was being developed: "Enforcement of the CFR has been non-existent until a dog policy and possibly a special regulation is established. "

The 1979 Pet Policy was established as the official off-leash recreation policy for the GGNRA as required by the enabling statute and the promise made to the city. NPS issued press releases of the official off-leash policy (Lynn Thompson memo to Coalition For San Francisco Neighborhoods, 10/17/78). Again, NPS told San Francisco this policy was developed because the "[e]xisting federal regulations' were not "a viable situation in an urban area".

By summer of 1979, GGNRA had initiated the process to bring federal regulations into compliance with the enabling legislation and the off-leash policy. A draft special regulation 7.97(b) was submitted to the Western Regional Director NPS for approval. Department of Interior Solicitor Ralph Mihan reviewed the draft proposed regulation and found "the proposed regulation to be legally acceptable", but advised the formal request should include a "authorship statement or a statement of significance" which "must be included within the rulemaking package before its transmittal to Washington." (Ralph Mihan, Solicitor to Western Regional Director, Re: Proposed Rulemaking Golden Gate National Recreation Area (Pets), 7/23/79). The draft proposed regulation in fact contained a statement of significance, the Section Seven Amendment was being proposed "because large portions of land formerly used as pet exercise areas have been included with Golden Gate National Recreation Area." (1/9/80 Regional Director memo to Superintendent GGNRA: Re: Proposed Special Regulation -Pets USPRODo0386-8). The proposed regulation also called for public comment "within 30 days of the publication of this notice in the Federal Register."

Although this 1979 Pet Policy was consistent with the statutory mandate for the GGNRA to provide "needed recreational open space necessary for urban environment" and required by the promise made to San Francisco when city property was donated to the park, officials in Washington D.C did not finalize the Section Seven Special Regulation to bring their regulations into compliance with the enabling statute. Subsequently the 1979 Pet Policy guidelines were incorporated into the 1982 Natural Resources Management Plan as Appendix C. The duplicity lay in the GGNRA's intentional failure to designate the 1979 Pet Policy as a Section Seven Special Regulation-the type of regulation referred to in the Memo dated 12/22/77 referenced above. The significance of this will be apparent in 2001.

Finally, Director William J. Whalen's 1980 NPS Management Policies produced a systemwide change in overall policy and management. The clear

directive was preservation first, recreation second." (Administrative History of Point Reyes National Seashore)

If you look at some of the GGNRA's management activities, you have cause to wonder if the GGNRA really wants us in "their park". For example, in 1989 the GGNRA, under the supervision of Brian O'Neill, signed on to a biosphere habitat program entitled "Man and Biosphere Habitat Programme" ("MAE" or "MAP"). One would be hard pressed to find a philosophy in greater conflict with the recreational priority of the GGNRA than that of Peter Bridgewater, Secretary of the MAB/MAP Programme, who has said, "Earth would be a better place if we had no people." The year of 1989, when the Biosphere program began, saw visitors drop by over 5 million in this Recreation Area that otherwise had shown steady growth in recreation visitors since they started tracking visitors in 1973.

In 1992 Bill Clinton's newly appointed Secretary of the Interior, Bruce Babitt, had a different vision for the National Parks System. A new anti-recreation ideology pervaded Park Service policy. Despite the legislative mandate that sound land use principles be applied "to maintain needed recreational open space necessary for urban environment", NPS summarily closed off in August of 1996:

? over 15 miles off-leash recreational space in San Francisco ? 11 miles of trail in Presidio ? 2.2 miles at Ocean Beach ? Lands End ? Fort Miley

The aforementioned Diamont memo confirms that all closures affected areas used for this recreational activity before the park was established: Ocean Beach, Fort Funston, Sutro Heights Park, Phelan Beach, Lands End, and Baker Beach. Diamont's comments concerning Ocean Beach explain why that closure has been unsuccessful:

"Ocean Beach: no rules should be enforced here. Ocean Beach is too large and too accessible to control dogs. It would be a logistical nightmare for the Park Service to try. Also lifestyles are such on Ocean Beach, that an inflexible NPS here could hurt our improving relations with visitors."

The DEIS states: "Since the 1990s, the San Francisco Bay Area population and overall use of GGNRA park sites have increased, as have the number of private and commercial dog walkers. At the same time, the number of conflicts between park users with and without dogs began to rise, as did the fear of dogs and dog bites or attacks."

With respect to the claim in the DEIS that use of the Recreation Area had increased, two points can be made. First, increased usage over time was anticipated when this National Recreation Area was created. The House Report No 92-1391 made clear that the GGNRA would be confronted with

problems in San Francisco that would require careful planning because of the high volume year-round visitation:

"As a national urban recreation area, this new component of the national park system will be confronted with problems which do not frequently occur at other national park and recreation areas. Great numbers of people can be expected to use the area-particularly those portions located in San Francisco County." (pg. 11)

There is no surprise here. Therefore, abandonment of the principles outlined in the enabling legislation, in an absence of appropriate monitoring of resources, as proposed in this DEIS is not an acceptable management reaction to increased usage of the GGNRA by citizens.

Second, the number of park visitors has NOT increased dramatically over the past 20 years. In fact, in 1987 the GGNRA experienced its greatest number of visitors, coming in at 21,767,176 recreational visitors. According to NPS statistics, in 2010, the total number of recreational visitors was 14,271,503, down about 34% from 1988.

Consider also that in the past 20 years the GGNRA acreage has almost doubled in size, and expanded into San Mateo County. This puts a far larger population in direct proximity to the Recreation Area, yet the visitor numbers are down dramatically. Users of the GGNRA will tell you that this DEIS is just a reflection of the management priorities that Brian O'Neill started with his Biosphere commitment that have systematically denied and discouraged access for the public to this Golden Gate National Recreation Area.

Evidence the issue was really a new ideology is the fact that the GGNRA experimented with changing its name to Golden Gate National Parks (GGNP) in an effort to convince citizens of the Bay Area that the paramount mission of the NPS is to bring the wilderness to the City. On August 28, 2001, the GGNRA Advisory Commission meeting was opened by Chair Rich Bartke as a regular meeting of the Advisory Commission to the National Parks in the Golden Gate Area. Mr. Bartke was asked to correct that reference by a concerned citizen, Michael Goldstein. Mr. Goldstein stated publicly in his comments to the Commission that this was not the first time he had addressed the Commission on this topic and that this practice of omitting the word "recreation" from the Park's name had become a matter of public concern. This runs counter to the intentions of the City of San Francisco and its citizens who had been promised that the GGNRA will remain an urban recreation area.

The DEIS further states: During this period (2001), it was clarified by the Department of Justice, U.S. Attorney, and the Department of the Interior

Solicitor Offices that the voice-control policy then in effect at Fort Funston and other locations in the park was contrary to NPS regulations. In a public meeting in January 2001, the Commission acknowledged that the voice control policy was contrary to 36 CFR 2.1s(a)(2), prohibiting off-leash dogs in national parks, and therefore illegal and unenforceable.

Now we see the significance of the GGNRA/NPS decision to refrain from making the 1979 Pet Policy a Section Seven Special Regulation. By doing so, they were able to exercise "plausible deniability". In reality, this is just one more example of how the GGNRA has dealt in bad faith with the public whom they, in theory, serve.

The public and elected officials were incensed at the GGNRA change in policy. Indeed, in 2001, a Resolution was approved by the San Francisco Board of Supervisors, detailing the history of the relationship between the City, the public and the GGNRA. The Resolution (and its findings) is so significant that it is quoted in full below:

RESOLUTION for S.F. Board of Supervisors Vote [Urging GGNRA to delay leash enforcement - Passed on December 10, 2001]

Resolution requesting the National Park Service to delay enforcing, in the San Francisco parks situated in the GGNRA, 36 C.F.R. 2.15, requiring pets to be on leash in national parks, until the ANPR process has been completed.

WHEREAS, In 1975, the City and County of San Francisco transferred Fort Funston and other City-owned park lands to the federal government to be included in the Golden Gate National Recreation Area (GGNRA), to be administered by the National Park Service (NPS); and,

WHEREAS, The statute creating the GGNRA (16 U.S.C. Section 460bb) specifically states that the GGNRA was established to provide for the maintenance of needed recreational open space necessary to the urban environment and planning and requires that the Secretary of the Interior "utilize the resources in a manner which will provide for recreation and educational opportunities consistent with sound principles of land use planning and management;" and,

WHEREAS, Former Charter section 7.403-1 (a), as approved by the voters, required that the deed transferring any City-owned park lands to the NPS include the restriction that said lands were to be reserved by the Park Service "in perpetuity for recreation or park purposes with a right of reversion upon breach of said restriction;" and,

WHEREAS, When Fort Funston and other City-owned parks were transferred to the federal government, a federal regulation existed requiring

all pets to be on leash in federal parks, yet the NPS chose not to enforce this regulation in the San Francisco City parks; and,

WHEREAS, In April 1978, the GGNRA stated its position that "the ordinary guidelines outlined in the Code of Federal regulations do not really apply in an urban area," and that "people and their animals have been visiting the park for too long to apply an all-inclusive arbitrary policy;" and,

WHEREAS, The Superintendent of the GGNRA in the spirit of this statement developed a draft pet policy and submitted it to the GGNRA Advisory Committee for further review and public hearings; and,

WHEREAS, In September of 1978, after extensive public hearings and public surveys, the Advisory Commission proposed guidelines for a pet policy for the San Francisco Unit of the GGNRA, designating Fort Funston, Lands End, Ocean Beach, Fort Miley, Baker Beach, and Crissy Field for continued off-leash recreation; and,

WHEREAS, On October 6, 1978, GGNRA General Superintendent Lynn Thompson accepted these designations with the following comment: "As you know, the Advisory Commission approved the proposed guidelines for a pet policy in the San Francisco Unit of the GGNRA at their September 27 meeting," and she continued, "We are accepting in total the Commission's recommendations for each of these areas;" and,

WHEREAS, On February 24, 1979, the GGNRA finalized the pet policy for both San Francisco and Marin County, establishing areas where pets could be exercised off-leash; and,

WHEREAS, In 1982, the 1979 Pet Policy was incorporated into the GGNRA Natural Resources Management Plan as Appendix C; and,

WHEREAS, On July 8, 1992, NPS Western Regional Director Stanley Albright assured U.S. Senator John Seymour that "there is no change in the 1979 Pet Policy which provides the visitor of walking one's dog off leash"; and,

WHEREAS, By letter dated July 8, 1992, Western Regional Director Stanley Albright also assured U.S. Senator Cranston that there would be no change in the 1979 Pet Policy; and,

WHEREAS, On February 5, 1999, Pacific Western Regional Director John Reynolds assured U.S. Senator Dianne Feinstein that the "GGNRA has adopted a pet policy that is more liberal than the regulations enforced at other national park sites throughout the United States, where pets are required to be leashed at all times and are, for the most part, excluded from

all but developed areas," and the letter continued, "[The] GGNRA " has, with the assistance of the park's Advisory Commission, established a pet policy that allows some opportunity for visitors to enjoy a few designated areas as voice control areas where pets are allowed off-leash;" and,

WHEREAS, On March 19, 1999, GGNRA Superintendent Brian O'Neill stated to U.S. Congresswoman Nancy Pelosi, the "GGNRA has adopted a pet policy that is more liberal than pet regulations at other national park sites throughout the country ... certain areas of the park have been designated as voice control areas where pets are permitted off-leash;" and,

WHEREAS, In November of 2000, the GGNRA Advisory Committee attempted to revoke the 1979 Pet Policy, but failed due to a point of order; and,

WHEREAS, On January 23, 2001, over 1,500 people attended the GGNRA Advisory Committee meeting to protest revocation of the 1979 Pet Policy, nine San Francisco supervisors spoke, and both Senator Speier and Assemblyman Shelley sent letters to be read by their representatives; and,

WHEREAS, The Advisory Committee recommended that the GGNRA hold meetings with stakeholder groups within the next 120 days to resolve the issue, and to not change leash enforcement for this period; and,

WHEREAS, The Advisory Committee at this meeting did not vote on the Pet Policy; and,

WHEREAS, Rather than hold stakeholder meetings, the GGNRA received permission from Washington for a more formal process called Advance Notice of Proposed Rulemaking (ANPR), but this process has not begun; and,

WHEREAS, In November, 2001, the GGNRA began to aggressively enforce the leash requirement at Fort Funston, sending teams of law enforcement rangers for 2 to 3 hour segments, and issuing tickets for walking dogs off-leash without initiating the ANPR process in good faith with the public; and,

WHEREAS, Off-leash recreational users believe that off-leash recreation is legal at Fort Funston, and they agreed to go through the ANPR process and further rulemaking in order to obtain a special rule for the GGNRA that specifically recognizes that off-leash dog-walking is permissible in certain GGNRA parks; and,

WHEREAS, The Board of Supervisors of the City and County of San Francisco finds that the recent enforcement of 36 C.F.R. 2.15 is in contravention to the representations made to the public at the Citizens

Advisory Committee meeting on January 23, 2001; now, therefore, be it

RESOLVED, That the Board of Supervisors of the City and County of San Francisco hereby requests the National Park Service not to enforce, in the GGNRA parks which were donated to the federal government by the City and County of San Francisco, 36 C.F.R. 2.15, which requires that all pets be on leash in federal parks, until the ANPR process has been satisfactorily completed; and, be it

FURTHER RESOLVED, That the Board of Supervisors of the City and County of San Francisco hereby requests the NPS to advise the Board as to the status of the ANPR process; and, be it

FURTHER RESOLVED, That the Clerk of the Board of Supervisors shall send copies of this resolution to the offices of United States Senator Dianne Feinstein, United States Senator Barbara Boxer, Congresswoman Nancy Pelosi, Congressman Tom Lantos, State Senator John Burton, State Senator Jackie Speier, Assemblywoman Carole Migden, Assemblyman Kevin Shelley, GGNRA Superintendent Brian O'Neill and the National Park Service.

Unfortunately, the GGNRA ignored the Resolution, and in 2002 instituted a ban on off-leash recreation and began ticketing dog guardians for recreating with their dogs off-leash. As mentioned in the Resolution, pressure from the City of San Francisco to take back the management of these properties in the courts, as well as the Federal court confirming other violations of law the GGNRA had been guilty of, caused the GGNRA to invite the public to petition the Federal government for the ability to create a Section Seven Special Regulation for off-leash recreation in the GGNRA (ANPR).

The public submitted thousands upon thousands of requests to the Federal government, and a Federal Panel reviewed the history and legal agreements for the GGNRA. The Federal Panel that reviewed the applicable authorities, policies, planning guidelines, and information on Park setting, natural and cultural resources, and public safety developed the following observation (among others):

"GGNRA parkland is immediately adjacent to San Francisco, one of the most densely populated urban centers in the United States of America, and manages a significant portion of recreational open space in the city. Most residents do not have 'backyards' or access to private open space to exercise their pets off-leash. Residents rely on the close proximity of GGNRA open space for this purpose." (ANPR Decision Documents; Federal Panel Recommendations, supra, Section 3, emphasis added.)

"... [the GGNRA should] clearly distinguish between on-leash, off-leash, and

no pet areas to avoid management and public confusion." (Federal Panel Recommendation to the General Superintendent on Proposed Rulemaking for Pet Management at Golden Gate National Recreation Area, Section 4 ("Federal Panel Recommendations"). p. 11 (Revised November 7, 2002). [See http://www.nps.gov/goga/pets/anpr/pdf/federal_panel_recommendation.pdf.]

The Federal Panel concluded in its November 2002 recommendation to the GGNRA it would be appropriate to create a Section Seven Special Regulation to allow off-leash recreation in the GGNRA.

At that time, the GGNRA could have instituted the 1979 Pet Policy as the Section Seven Special Regulation for the GGNRA. Instead, they decided to institute Negotiated Rulemaking (NR) to create a new pet management policy for the GGNRA.

Prior to NR starting, in 2004, a Federal magistrate reviewing tickets issued to dog guardians determined that the 1979 Pet Policy had been illegally rescinded, and re-instated the 1979 Pet Policy as the controlling law for off-leash recreation in the GGNRA.

Again, even with the legal protection of a court order, the GGNRA chose not to institute the 1979 Pet Policy as the new Section Seven Special Regulation. Instead, the GGNRA appealed the Federal Court's decision. In 2005 the GGNRA lost their appeal. The 1979 Pet Policy was affirmed as the controlling pet policy in the GGNRA.

Judge Alsup of the Federal Court noted in his decision affirming reinstatement of the 1979 Pet Policy in the GGNRA, his findings regarding the history of pet management in the GGNRA:

"In sum, for more than twenty years, the GGNRA officially designated at least seven sites for off-leash use. This was not accidental. It was a carefully articulated, often studied, promulgation. The responsible GGNRA officials in 1978 and thereafter presumably believed they were acting lawfully. Even now, the government concedes that the GGNRA had full authority at all times to relax the general leash rule at the GGNRA but argues it could have done so, at least after 1983, only via a "special regulation." In other words, the agency allegedly used the "wrong" procedure back in 1978 (and thereafter) even though a "right" procedure to reach the desired result was available and could have been used. The government has not revealed its internal justification for following the "wrong" process.

Whatever it was, the justification was abandoned in 2002 with the two-word explanation that it had been "in error." With this ipse dixit, the NPS wiped away two decades of policy, practice, promulgations, and promises to the

public." (United States v. Barley, Order Of Affirmance, supra, p. 5.)

Correspondence ID: 4678 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: The GGNRA continued to flout both recommendations that it solicited from the Federal Panel and the Court decision to reinstate the 1979 Pet Policy as the law governing pet management in the GGNRA. In 2007, Daphne Hatch, Chief of Natural Resources Management and Science for the GGNRA was quoted in the San Francisco Chronicle as saying: "Ocean Beach without the people is an incredible habitat. But people think of it as a sandbox or their backyard."

While Superintendent O'Neill gratuitously stated that the Court "effectively reinstated the 1979 Pet Policy", the GGNRA refused to acknowledge the reinstatement of the 1979 Pet Policy in the manner prescribed by law, 36 C.F.R. Section 1.7(b). There was no written designation of the reinstated off-leash properties; indeed, the GGNRA used this murky situation to continue to harass and ticket off-leash dog-walkers in areas that were off-leash pursuant to the 1979 Pet Policy and amendments thereto. In addition, the GGNRA, in violation of 36 C.F.R. Section 1.7(a)(4), persisted in ignoring the Court's ruling and misinforming the public. For example, on the NPS website, under the heading, "Dogwalking Information and Regulations", a statement dated June 8, 2005, proclaims: "Due to the recent court ruling, this information is under review and will be revised shortly." A brochure found online at the NPS website entitled, "Enjoying the Park with your Dog", advises readers that, "Where dogs are permitted, Federal law requires that they be on a leash, not to exceed six feet in length, in all units of the National Park System."

In addition, for over a year, GGNRA management refused to change the signage in the Park to reflect the Court's ruling in derogation of 36 C.F.R. Section 1.7(a)(1)(4). For photo documentation of the illegal signage, see <http://oceanbeachdog.home.mindspring.com/id8.html>. This illegal and confusing signage clearly created user conflict and was detrimental to the safety and enjoyment of those visiting the GGNRA.

I would add as an aside at this point, objectives listed in this DEIS were the desire to enhance Visitor experience and Safety, enhanced compliance with Dog Rules, and Park Operations. It should be evident from this point in GGNRA history, that the greatest obstacle to fulfilling these objectives was and still is GGNRA Management itself.

Despite the fact that GGNRA management had been given permission to create a Section Seven Special Regulation for off-leash recreation in the GGNRA; when the Court reinstated the 1979 Pet Policy, the Superintendent refused to

make the 1979 Pet Policy a Section Seven Special Regulation. He instead instituted a Negotiated Rulemaking (NR) process that was conducted in bad faith, was unlawful and did not reach consensus. The GGNRA refused to acknowledge the 1979 Pet Policy as the logical starting point for NR. In fact, the 1979 Pet Policy was not listed as a document the NR Committee would be able to refer to within the NR process. The GGNRA continued to cling to their view that the 1979 Pet Policy was an illegitimate document which NEVER had the power of law despite the contrary findings of the Court.

NR required consensus among participants. If consensus was not reached for a Section Seven Special Regulation, the GGNRA was allowed to create a Rule arbitrarily, as it did when they rescinded the 1979 Pet Policy. In fact, even if the NR did reach consensus, the GGNRA maintained that they were still free to ignore the findings of the NR process and subsequently create its own rule.

The GGNRA selected the participating groups and their representatives. Six of the nineteen groups that participated had submitted a petition to the Federal government asking that ALL off-leash recreation in the GGNRA be banned. These same groups had both publicly and privately stated they saw NR as a means to eliminate off-leash recreation from the GGNRA entirely. Despite protests, they remained on the NR Committee.

I was initially slated to participate in NR as a representative for Ocean Beach DOG (OBDOG). When I discovered the flawed manner in which this process was to be conducted, I complained. Instead of resolving my legitimate complaints about the process, the GGNRA/NPS/DOI threw me off the NR Committee. NR predictably came to an end without consensus, and was a colossal waste of taxpayer money to the tune of over five hundred thousand dollars.

Subsequently, the initiation of the DEIS was announced. The explanation for this might be found in a quote from then Western Regional Director (now NPS Director) Jon Jarvis. At the NPS Centennial Initiative Listening Session (Presidio Officer's Club, San Francisco, Calif., March 22, 2007) Director Jarvis said to me and my husband, and I quote, "I would rather give up those [the GGNRA] properties than have dogs running loose on them." In 2008, the GGNRA supported an attempt by Nancy Pelosi to surreptitiously slip a Park name change (and therefore a change in the governing mandates) from National Recreation Area to National Park through bill H.R. 6305. This action can be construed as an admission that the NPS/GGNRA is aware their actions do not conform to the enabling legislation. Public outcry upon the discovery of this section in HR 6305 forced Nancy Pelosi to withdraw her blatant attempt to circumvent the will of the people and the Federal Court.

Now in 2011, we are presented with this 2400 page DEIS.

Evaluation Of The Actual DEIS

There is no "monitoring of the vital signs" of the GGNRA to support the premise of this DEIS. Further, the failure to complete vital signs monitoring in a competent manner violates Federal law as outlined in the NPS resource "Vital Signs Monitoring".

(<http://science.nature.nps.gov/im/monitor/LawsPolicy.cfm>). A list of laws violated due to the failure to monitor (per this resource) is listed below:

? National Park Service Organic Act ? General Authorities Act of 1970 ?
Redwood National Park Act ? National Environmental Policy Act of 1969 ?
Clean Water Act ? Clean Air Act ? Endangered Species Act of 1973 ?
Environmental Quality Improvement Act of 1970 ? Coastal Zone Management
Act of 1972 ? Marine Protection, Research, and Sanctuaries Act of 1972 ?
National Parks Omnibus Management Act

The failure to complete competent "vital monitoring" results in the following fatal flaws in this DEIS:

1) The Draft Plan/DEIS assumes but does not provide the required rigorous analysis that resource conditions result solely from dog use of the sites, discounting the contribution from other visitors and recreational users. The Draft Plan/DEIS does not address the contribution of other impactful activities, including special events, to the resource conditions and existing impacts at each of the GGNRA sites.

2) In many places, the Draft Plan/DEIS does not provide any data on actual impacts by dogs in areas being proposed for new dog walking restrictions. The words can, may, and could are everywhere in place of hard facts which would have been in evidence had the required "vital monitoring" been done. In places where data are provided, the Draft Plan/DEIS makes undocumented assumptions that there are unacceptable impacts and that dogs are the culprits.

3) The Draft Plan/DEIS assumes species are present in areas where there is no record of their presence. In other places, there is inconsistent information about the presence of species.

4) Many of the findings in the Draft Plan/DEIS are founded on a reference included in the document as Appendix G, "Law Enforcement Data" (NPS 2008c). This reference document is critically deficient in substantiating statements made in the characterization of existing conditions and in the analysis of the environmental consequences. For example, an entry is as follows: "observed a black dog chasing a flock of 14 snowy plovers. I observed the dog chasing the birds from the water to the dunes and up and down the beach for several hundred meters north and south. The dog would charge at the birds and the Plovers would fly away from the dog. Each time the Plovers would attempt to

land, the dog would charge directly at them and cause them to takeflight again. I watched this happenfor continuallyfor eight minutes timed by my watchfrom 1150 to 1158 hours. Then the dog stopped chasing the Plovers and wandered in the hilly dunes to the northfor several minutes. The dog then returned to chasing the Snowy Ploversfor a few minutes more ... After the dog ceased chasing the Plovers, they stopped taking flight and started feeding at the water line." Clearly, if this dog was chasing plovers, they would not have returned to feeding at the water line after the chase was over. Plovers feed at the high tide line when the water has already retreated. These were sanderlings, birds that appear almost identical to the plover, are plentiful at Ocean Beach (not threatened or endangered) and can be differentiated by different feeding patterns and different resting patterns.

5) The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but no data are provided as to where/if they are actually present.

6) The Draft Plan/DEIS assumes, but fails to demonstrate, the "cause and effect" relationship that where dogs are present within GGNRA sites, there is a disturbance of natural resources or demonstrate that the disturbance of resources is attributable to dogs (versus other factors).

7) The Soils and Geology section (page 225) includes the following statements: "Dogs and dog walkers that do not stay on designated trails and venture offtrail create social trails that become denuded ofvegetation and result in increased soil compaction." and "Soil compaction is common along social trails that have been created by -and are heavily used by -bikers, hikers, runners, and dog walkers." The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. There is little or no objective measurement of trail degradation in this DEIS. Condition-class systems are commonly used in visitor impact monitoring, and trail incision measures assess erosion but we do not see those measurements in this DEIS. Once again, the "vital sign monitoring" is entirely absent in this DEIS.

8) Because the draft EIS does not recognize recreational resources as an environmental resource, the analysis of the environmentally preferable alternative is flawed. Recreation is identified in the GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognizes that the achievement of these outstanding values is not mutually exclusive.

9) When new lands become part of GGNRA, the recreational uses existing at the time of acquisition should be allowed to continue unless GGNRA determines, through the public land planning (vital monitoring) and NEPA process that

unacceptable impairment would occur.

10) The Draft Plan/DEIS not only fails to disclose and evaluate the impacts of the alternatives on recreational resources in the context of an urban environment, it dismisses the quality of the urban environment entirely on page 22 where it states, "the quality of urban areas is not a significant factor in determining a dog management plan." As recognized in its enabling legislation, one of the most important aspects of the GGNRA is the sharp contrast between its undeveloped open spaces and the adjacent developed urban environment. The GGNRA's open space and recreational opportunities are intended to provide refuge and relief for nearby urban dwellers. According to NEP A, An EIS is required to analyze the human environment. The federal NEP A rules define the human environment and its scope in an EIS as follows: "Human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." When an EIS is prepared and human and natural/physical environmental effects are interrelated, the EIS should discuss all of these effects on the human environment. The flaws listed above will be highlighted by further analysis of the Western Snowy Plover at Ocean Beach and Crissy Field, the Bank Swallow at Fort Funston, Sweeney Ridge, Mori Point, Muir Beach and review of trails in Marin County.

Alleged Protection For The Western Snowy Plover

This DEIS proposes to further restrict dogs at Ocean Beach and Crissy Field based upon an alleged necessity to protect the Western Snowy Plover. The language of the Endangered Species Act contemplates and supports the position that any loss of these recreational areas for such purpose be balanced by scientific proof that such sacrifice will indeed help save the plover from extinction.

The requisite monitoring of the plover (as dictated by NPS regulations) in the GGNRA has not been completed in a manner that would provide scientific proof of a need for restrictions. In fact, even the GGNRA admitted in 1996 that the scientific evidence showed that restriction of off-leash recreation will NOT increase the number of plovers at Ocean Beach. It is more likely that the restriction of off-leash recreation in these areas will negatively impact the plover population.

There was a "study" at Ocean Beach in 1996 by Daphne Hatch, GGNRA Wildlife Biologist, which was more of an inventory assessment, and its conclusions are fatally flawed. I will review that "study" in detail here. The next "study" the GGNRA performed with respect to this "threatened" resource at Ocean Beach was in 2006. Hardly an example of vital signs monitoring that meets the standards described in NPS documents. Restrictions were implemented at both Ocean Beach and Crissy Field, based upon this "study" although the "study" was only conducted at Ocean Beach. Further, without

mitigation measures implemented over this 10 year time span, and without coordination of intermittent monitoring, it is impossible to draw any conclusions as to the benefit/detriment of restricting or eliminating dogs within these respective ecosystems. The last "study" of the plover in this DEIS was performed in 2008, and is at Crissy Field only. This "study" will be reviewed within this document, but it is again fatally flawed in many respects.

Is The Western Snowy Plover In Danger Of Extinction?

The best scientific data currently available establishes that the Western Snowy Plover is not threatened or endangered (at risk for extinction) at all. Significantly, a study commissioned by the US Fish and Wildlife Service (USFWS) and the US Geological Service (USGS) in June of 2000 noted: "Coastal and inland populations of Snowy Plovers in the western United States are currently being managed separately; coastal populations are protected as a Distinct Population Segment under the U.S. Endangered Species Act, while inland populations are not listed. Our study provides no evidence of genetic differentiation between coastal and inland populations." (Emphasis added.) These findings demonstrate that the Western Snowy Plover population is far greater than previously believed, and so large as to no longer qualify the Western Snowy Plover as either threatened or endangered.

Why Is The Western Snowy Plover Still Considered Threatened With Extinction?

The latest decision by the USFWS to continue to keep the Western Snowy Plover (WSP) on the Endangered Species List (ESL) is a clear example of the violation of the Endangered Species' Act's requirement that decisions be "based upon the best scientific and commercial data available". Traditional tenets of science (the scientific method) have been ignored to justify this conclusion.

The scientific method is the process by which scientists, collectively and over time, endeavor to construct an accurate (that is, reliable, consistent and non-arbitrary) representation of the world. In summary, the scientific method attempts to minimize the influence of bias or prejudice in the experimenter when testing a hypothesis or a theory.

The scientific method has four steps

1. Observation and description of a phenomenon or group of phenomena. Based upon monitoring of the movements of the plovers on the west coast (the WSP) and inland plovers, and the perceived decline of the WSP, the USFWS became concerned as they believed the WSP was a species distinct from the large inland population of plovers, and as such required protection from extinction. The Western Snowy Plover was first listed as a threatened species in 1993. Quoting

the USFWS (all of their quotes will be italicized):

"The 1993 listing rule stated that the Pacific Coast WSP is "genetically isolated" from the interior breeding populations (58 FR 12864). We based this conclusion on banding and monitoring data, not genetic data. At the time of listing, we assumed the reproductive separation indicated by the banding data, over time, could lead to genetic differentiation. Genetic data or the western snowy plover was not available in 1993. /I

2. Formulation of a hypothesis to explain the phenomena. The hypothesis, as stated above, was: Because there was little or no breeding observed between the WSP and the inland population of plovers, the WSP was genetically different than the large population of plovers living inland, and being in decline, the WSP required protection.

3. Use of the hypothesis to predict the existence of other phenomena, or to predict quantitatively the results of new observations.

Should genetic testing be performed, the USFWS expected to see genetic differences between the coastal WSP population and the large inland population, which would confirm the need for protection of the WSP. The USFWS had no genetic data to confirm their hypothesis. However, apparently the ESA allows the USFWS to move to protect a species first, and investigate to be sure, later. There are timelines specified by law as to how long the USFWS has to test their hypothesis, and it does seem they were abused. In the meantime, measures were taken to protect the WSP, which included most notably for the public, restriction of beach access.

4. Performance of experimental tests of the predictions by several independent experimenters and properly performed experiments.

In fact, a study was done many years later funded and approved by the USFWS and the USGS to test the USFWS hypothesis.

"...a master's thesis (Gorman 2000) that did not find evidence of genetic differentiation between the Pacific Coast WSP and western interior snowy plover populations using mitochondrial DNA (mt DNA). tt

The Scientific method concludes: If the experiments bear out the hypothesis it may come to be regarded as a theory or law of nature If the experiments do not bear out the hypothesis, it must be rejected or modified.

So, now that the USFWS hypothesis had been disproved, and the WSP could not be distinguished genetically from the very large inland plover population did the USFWS move to delist the WSP? NO. In fact, they continued to proceed to implement management policies to protect the WSP, further restricting the

public's access to beaches on the Western coast. Several entities (City of Morro Bay and Surf Ocean Beach Commission) who were suffering due to those management policies decided to sue the USFWS to force them to re-evaluate this situation.

The announcement to retain the WSP's listing as a threatened species on April 21, 2006 is the USFWS response to this lawsuit. It appears that the USFWS, not wishing to delist the plover, refused to reject their hypothesis or modify their hypothesis that the WSP was genetically different, even though it had been reliably disproved. It is not revealed in the announcement how this came about, but it appears that the USFWS authorized another study in an attempt to refute this first study that disproved their hypothesis. USFWS stalled the court proceedings, possibly because they were counting upon the results of this second study using another method of DNA testing to substantiate their original hypothesis that the WSP was genetically different from the large inland population. The second study confirmed the results of the first.

"...a more recent study by Funk et al. (2006) includes analysis of microsatellite DNA markers. Funk et al. (2006) found no statistically significant genetic differentiation between Pacific Coast WSP and western interior snowy plover populations using mtDNA and microsatellite DNA markers. "

Did the USFWS at this point acknowledge their hypothesis was incorrect and move to delist the WSP because it is the same creature as the large population of plovers who live inland and whose numbers require no protection from extinction? NO.

Perhaps most telling is the general opinion of Daniel Funk who provided the second DNA study, and whom the USFWS certainly chose to rely upon: " ... it is important to use data from a wide range of criteria-interbreeding, nuclear DNA, behavior, morphology, ecology, etc.-not just mtDNA, when delimiting species boundaries."

This is indeed a disturbing concept, because this indicates Mr. Funk and the USFWS are quite comfortable setting public policy that restricts public access to thousands of miles of beach property based upon their personal definition of a species which may ignore verifiable hard DNA data in deference to intangible and/or incomplete data which is subject to bias. The USFWS chose to rely upon outdated, observational data regarding the lack of interbreeding of the WSP and the larger inland population to conclude that these two populations are separate and distinct and that the WSP should therefore, still be protected.

"In this finding, we rely primarily on the banding and resighting efforts conducted during the period of 1984 through 1993, as this is the period when banding efforts were underway at several areas on the Pacific coast and in the western interior, and nest monitoring studies and breeding season surveys were

underway at many locations when banded birds could be detected. Interior populations have not been banded since 1993 (L. Stenzel, in litt. 2005)."

Furthermore, the USFWS ignored yet another fundamental of the Scientific Method in the interpretation of this outdated data. The USFWS recruited four heavily biased researchers in favor of protection of the snowy plover to examine the banding data. All four are associated closely with the Audubon Society or Point Reyes Bird Observatory (PRBO). The Audubon Society formally opposed the delisting of the plover and officials at PRBO are in large part responsible for the initial listing of the plover as threatened. Not surprisingly, their conclusions were as follows:

" ... we conclude that the Pacific Coast WSP is markedly separate from other populations of the subspecies due to behavioral differences and that it, therefore, meets the requirements of our DPS policy for discreteness. Banding studies and resighting efforts demonstrate that during breeding, the Pacific Coast WSP segregates geographically from other members of the subspecies, even those that also winter on the Pacific coast. Although not absolute, this segregation is marked and significant. "... This behavioral difference tends to set Pacific Coast WSP individuals apart from the interior birds with which they may mix during the winter."

The USFWS has chosen to deviate from established scientific method, ignore incontrovertible, tangible, and specific data such as the two DNA studies, and rely instead upon clearly biased assumptions regarding the behavior and breeding of the WSP to justify their decision. The decision requires the USFWS to assume that there is little or no interbreeding between the populations. The decision requires the USFWS to assume that should the coastal plover population be lost, the inland population could not recolonize the coast. Neither of these assumptions has the benefit of reliable, incontrovertible data.

Therefore, since 20% of the plovers have decided they prefer to "hang out" on west coast beaches rather than with the rest of the genetically identical plovers inland, the general public will not be allowed that privilege.

For those unfamiliar with the genetic lexicon, consider how it is the Courts and the medical community determine the father of a child when it is in doubt. DNA tests are the standard test utilized, to the exclusion of all others. It would be a gross injustice for the Court to disregard DNA evidence that confirms the child's father is Mr. A, and instead conclude the child's father is Mr. B simply because the child behaved more like Mr. B.

Decisions made based upon intangibles, and without deference to hard, reliable scientific data are subject to abuse of discretion; and are the antithesis of the established "scientific method" which goes to great lengths to minimize the influence of bias or prejudice in the experimenter when testing an hypothesis or a

theory. The Endangered Species Act requires decisions to be based upon science's best evidence, not ideology or politics as it has been in the case of the Western Snowy Plover.

While I and others understand that the GGNRA cannot choose to ignore management of the Western Snowy Plover unless and until the USFWS formally delists the plover, we believe this evidence should temper the decision making when it will result in depriving the public of valuable recreational resources, as expressed in the language of the ESA.

Will Banning Dogs At Ocean Beach Help Protect The Plover From Extinction?

Putting aside the controversy as to whether the Western Snowy Plover is threatened with extinction or not, the United States Fish and Wildlife Service ("USFWS") Draft Recovery Plan for the Western Snowy Plover can answer this question. The Recovery Plan states that the Western Snowy Plover does not nest or breed at the Ocean Beach location. The Draft Recovery Plan also indicates that despite implementation of best management practices, this location (Ocean Beach) holds NO promise for the plover to nest or breed there in the future. (Table B-1, p. B-11.) Conversations with Gary Page of the Point Reyes Bird Observatory (a central contributor to the USFWS Draft Recovery Plan) reveal that this conclusion was drawn primarily because the level of human activity is too high on some California beaches to ever support a breeding population of the plover. This is consistent with the conclusions of a UK study (specifically identified in the new studies section of this comment) which states, "Sites that are highly disturbed are not used by breeding birds, and therefore any increase in disturbance levels on these sites will not alter population size". Thus, the state of the evidence is that the survival or extinction of the Western Snowy Plover population will not be impacted by the management of Ocean Beach.

And in fact, the GGNRA is well aware that the number of plovers on Ocean Beach is not directly related to the number of people or dogs present on the beach. Indeed, the first Hatch Report regarding the WSP and dogs at Ocean Beach concluded: "Factors other than number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach." (1996 Hatch Report, p. 10, emphasis added.) Further, Daphne Hatch's 1996 study for the GGNRA documented that since the off-leash policy was officially sanctioned in 1979, there has been an increase of more than 100 percent in the number of snowy plovers frequenting Ocean Beach. Even dog "rush hours" don't seem to faze the plovers—at least, GGNRA observers and analysts couldn't find any negative relationship between the number of dogs on the beach at any given time and the number of plovers on the beach at the same time (pg. 10, 13). Faced with this evidence, GGNRA officials twice acknowledged, at a December 16, 1996 "informational meeting" for San Francisco beachgoers, that banning off-leash recreation or banning dogs entirely at Ocean Beach would have NO effect on the number of plovers on Ocean

Beach. Despite this finding, the 1996 Hatch report still recommends the restriction of off-leash recreation at Ocean Beach.

The USFWS Declines To List Ocean Beach Or Crissy Field As Critical Habitat For The Western Snowy Plover

As stated before, the fate of the purportedly threatened Western Snowy Plover ("WSP") at Ocean Beach and Crissy Field will have no impact upon the overall survival of the species. Consider that the language of the Endangered Species Act ("ESA") itself states:

"The Secretary (of the Interior) may exclude any area from critical habitat if he determines that the benefits of such exclusion outweigh the benefits of specifying that area as critical habitat, unless he determines, based upon the best scientific and commercial data available, that the failure to designate such area as critical habitat will result in extinction of the species concerned. "

In concurrence, effective October 31, 2005 and again in 2011, the United States Fish and Wildlife Service ("USFWS") excluded all areas in the City and County of San Francisco as critical habitat for the WSP. In the text of the explanation of their decision in 2005, USFWS made the following findings:

+ Our current designation of critical habitat is different from the 1999 rule in two primary ways. In this designation, we utilized a different methodology for determining essential areas, and we relied upon additional scientific information which was not available in 1999. Thus, this rule, while similar in many respects to that in 1999, is a new designation, and does not designate the same areas. "

With respect to Ocean Beach, the following is stated:

+ We have decided not to include the suggested additional areas because they do not meet our three criteria from the Methods section: They do not support either sizeable nesting populations or wintering populations, nor do they provide unique habitat or facilitate genetic exchange between otherwise widely separated units. Although we do not consider these areas essential for recovery, we do consider them important, and will continue to review projects in these areas that might affect WSP as required by sections 7 and 10 of the Act. "

Allowing humans and off-leash dogs to enjoy Ocean Beach is not a new project; it is an activity that has persisted on Ocean Beach for well over 50 years. The language of the ESA contemplates and supports the position that any loss of these recreational areas be balanced by scientific proof that such sacrifice will indeed help save the WSP from extinction. Clearly, the decision not to include Ocean Beach or Crissy Field as critical habitat demonstrates that such scientific evidence cannot be provided.

Daphne Hatch's 1996 Study Is Fatally Flawed

Because the data do not support a conclusion that restricting off-leash recreation or banning dogs at Ocean Beach will increase the number of plovers, Daphne Hatch chooses to instead focus on the "disturbance" of the plover at Ocean Beach. However, no published study of a breeding bird quantifies the population consequences of disturbance. This is despite the fact that disturbance has been implied as a factor causing population decline for a wide range of species (Birdlife International 2000). Not surprisingly, it is postulated by Ms. Hatch that the energy expended by the plovers to avoid the disturbing dog is detrimental to their overall health and ability to breed, and as expected, no evidence is cited for such a conclusion. It is merely stated in the study, "little research has been conducted on the energetic effects of disturbance and whether individuals can compensate for this lost energy intake and the increased energy expenditure" (P.13). The NPS/JGNRA must consider the fact that the plover is known to annually migrate over 1,000 kilometers. In proportion to their size, this is the equivalent of a 6-foot human running 290 marathons. Does the energy expended when a plover moves 20 or 30 yards to avoid a roaming dog amount to anything significant?

Common sense would indicate that the "disturbance" issue has been substantially overblown, and no scientific study exists to contradict such common sense.

Out of 5,692 dogs observed during the one-and-a-half-year study by Ms. Hatch, less than one-third of one-percent chased plovers, and none ever caught or harmed one. An even smaller number "inadvertently" disturbed plovers, causing them to walk, run or sometimes fly out of reach. at See 1 below.

On the other hand, Ms. Hatch did not document the more significant matter of the deaths and disturbances of plovers perpetrated by predators such as the gull, raven, and crow. The gull, raven, and crow are documented predators of the plover, while dogs are not. Ravens are black, cousins of the crow, and larger than crows -generally about two feet long. Federal officials, who attribute the soaring numbers of ravens to sharp increases in road-kill and garbage from fast-food restaurants, admit that the population explosion is troubling, given the bird's intelligence.

The Hatch Report is an excellent example as to why scientific studies vary in reliability. Based upon the standards set forth in the scientific community, Ms. Hatch's study qualifies as "junk science", that is, "a publication that has the tone and trappings of science, but is so fundamentally and demonstrably flawed as to lack any serious claim to credibility." Further, this study does not meet the minimum requirements for legitimate "vital monitoring" within the NPS.

The Hatch study is at best an inventory assessment for the Western Snowy

plover. When viewed in the context of universally accepted scientific study guidelines, I find there are several reasons for relegating the Hatch Report to "junk science". First, it is merely an observational study. This means its conclusions are not based upon specific, quantifiable measurements, but instead upon observations. Observations alone allow for the participant's natural biases and subjectivity to influence the results. A credible scientific study to determine the success of, for example, a hair growth product, would dictate that the same person would observe the patients at the beginning and end of the treatment to assess the patients' baseline and subsequent hair growth (or lack thereof). This would eliminate the differences inherent in the observations of different people. The evaluator should have no affiliation with any of the manufacturers of the different products tested, and would not know which patient used which product. This is necessary to eliminate an evaluator's desire (even if it is subconscious) to favor a particular product. In contrast, the evaluators in the Hatch study consisted of several different volunteers; accordingly, there was no consistency as to the observations. Some evaluators may have characterized plover movement as a disturbance; others might have believed the plover moved on its own. Moreover, the volunteers were all bird enthusiasts, and the specific focus of their study was humans and dogs. As a result, the very premise of the study would lead the volunteers to subjectively and/or subconsciously expect and desire to document disturbance of the plover by dogs and their owners.

The effects of other wildlife and other possible interferences with the plover's daily activities were given but brief mention and not factored into the study in any meaningful way. These issues include the following: beach cleaning, off-road vehicles driven at night, activity of specific predators, non-native vegetation, shoreline erosion control projects (bulldozers), the actual width of the beach available to the plover, weather, helicopters, airplanes, bicycles, vehicles used during the day by Park staff, kites, and an oil spill. An evaluator cannot distinguish the reason or reasons why a plover flies away to another spot given the presence of a dog 40 feet away, a raven 50 feet away, and a plane flying overhead. Yet in the Hatch study, it seems clear the dog would be identified as the factor that disturbed the plover. The Hatch study is one that does not compensate for participant bias, and is not able to effectively associate cause and effect because too many variables are unaccounted for. Hence the study is indeed "junk science". Daphne Hatch's conclusions are without merit, and perhaps worse, led to action which may have harmed the plover at Ocean Beach.

These facts raise the other problem with the operative hypothesis in a study concluding that off-leash dogs are detrimental to plovers. Because the Hatch study at Ocean Beach ignores gulls, ravens and crows entirely, there is no data to determine whether the presence of dogs protects the plover from birds of prey. The statistics in Daphne Hatch's own study indicate that during the period prior to this study, the number of plovers at Ocean Beach was increasing, even though there was no requirement for dogs to be on-leash. The maximum Snowy

Plover counts for the 1979 to 1985 period ranged from 4 to 16, compared to maximum counts (since 1988) of from 38 to 85 birds (Hatch Report, p. 8). See Figure 2 below.

We believe that it is mischaracterizing the problem to attribute the "disturbance" of the plover exclusively (or even significantly) to off-leash dogs. The data do not support this conclusion. It follows, therefore, that addressing off-leash dogs only will not effectively protect the plover. We maintain, based upon the data, that proper protection of the plover would encompass the effect of humans, predators, and other wildlife as well.

The GGNRA Refuses To Implement Any Other Measures To Protect The Plover

Leashing of dogs (or the banning of dogs) on a 2.2 mile stretch of Ocean Beach is not a rational, measured response to the plover's seasonal presence on approximately 0.4 miles of Ocean Beach, and it does not address the hazards that both humans and predators present.

Peter Baye (U.S. Fish and Wildlife Service Biologist) noted the presence of the Snowy Plover, which roosts, but does not nest, on Ocean Beach, and made recommendations to the GGNRA for its protection. The plovers are present seasonally and relocate from year to year. Mr. Baye recommended: "Exclosures, in concert with educational signage, have been very effective in areas of concentrated usage where beaches are large (e.g. Cape Cod National Seashore). There are no unique impediments inherent at San Francisco's Ocean Beach which would render these measures infeasible here. They should be implemented at least on an experimental full-scale basis." (Memo to USFWS, 15 March 1995). Rather than establishing these flexible, seasonally rotated exclosures to protect plovers against humans, pets, and wild predators, the NPS chose the fixed and narrow measure of (illegally) banishing off-leash recreation, and now has chosen to ban dogs entirely. Mr. Baye's recommendation of a temporary, seasonal fence to be removed when the plovers leave the area and repositioned when they return could still be adopted. This solution would allow off-leash dogs on Ocean Beach but keep dogs out of the roosting area. Better yet, Mr. Baye's solution would protect the plovers from the predators, campers, runners, children, kite-flyers, etc., who now invade the roosting area under the GGNRA's current and proposed plan in this DEIS. Mr. Baye's recommendation clearly shows that off-leash recreation on Ocean Beach is compatible with protection of the Snowy Plover. The GGNRA has refused to consider the option of constructing a fence to protect the Ocean Beach plovers.

The GGNRA has made no concerted effort to alleviate the activities that are currently prohibited by law, pose a hazard to the plover, and occur in the vicinity of the plover's roosting. Table A, below, summarizes the current GGNRA record of citations for fireworks, littering, camping, and beach fires on the portion of

the beach where the snowy plover may roost. On an average Saturday or Sunday morning in the area the plovers roost you will find (by personal report):

? 5 beach fires (3 unattended) ? 7 campsites (2 had fires)

Extrapolating, if only weekend offenders were cited, there should have been 520 citations/year for fires, and 720 citations/year for camping. The GGNRA's dismal record of enforcement is reflected below in Table A. Moreover, it should be pointed out that litter is generally left at camp sites and the sites of beach fires. This litter attracts ravens and other predators to the area where the plovers are potentially roosting. The number of citations for littering is grossly inadequate. 1

If the GGNRA is unable to utilize enforcement to protect the plover from the public and their activities, it would make a great deal of sense to provide the exclosures as a refuge for the plover as suggested by Mr. Baye.

1 In an article published in The San Francisco Examiner; September 26,2005; by Marisa Lagos; entitled "Residents Irked by Ocean Beach Parties" (please refer to the original online version located at:

<http://www.sfexaminer.com/articles/2005/09/27/news/20050927neOIfIres.txt> or a nonline.printable copy located at:

<http://OceanBeachDOG.home.mindspring.com/GGNRAOceanBeachNonEnforcement.htm>), it is confirmed that the GGNRA's failure to enforce fire and litter policies has led to untold damage in the GGNRA's arbitrarily designated snowy plover habitat at Ocean Beach.

In addition, dead wildlife such as seals, sea lions and birds are not being promptly removed from the beach. The rotting carcasses of these dead creatures are left indefinitely on the beach to attract ravens and other plover predators. Recently, a carcass of a cow washed up on Ocean Beach where it sat for almost a week before officials removed it. The dead body was literally covered with ravens, ripping and eating the dead animal's flesh.

The GGNRA Has No Protocol For The Rescue Of Injured Or Sick Birds Or Mammals In The Park

The response of Federal officials to the oiling of wildlife after the Cosco Busan oil spill was slow and inadequate in the eyes of the citizens who live in the communities affected. However, to those of us who frequently utilize GGNRA properties for recreation, the poor response came as no surprise. Below are my personal notes from my conversation with a GGNRA Wildlife Ecologist regarding my attempted rescue of a bird that morning-sent by email to OBDOG members Thursday September 13, 2007:

Bill Merkle

Dispatch # 415-561-5505

Acknowledges it is unfortunate there are no signs for the public to be advised as to whom to call if a bird, marine mammal or other wildlife is injured or requires assistance.

GGNRA will not necessarily make every attempt to help an injured bird should you bring it to their attention. It will depend upon three factors: 1) type of bird 2) type of injury 3) location of bird

If it is a shorebird (a common bird), they are much less likely to help. He was noncommittal as to what injuries they would address. As to location, if I bring the bird to their personnel, what is that all about? It was explained to me that if the injury occurred in an undeveloped area, then they would be unlikely to rescue the animal or bird. When asked whether Ocean Beach was developed or undeveloped, he said the parking lot would be developed, but the beach would be undeveloped. He went on to explain that in undeveloped (natural) areas, they allow nature to take its course. Disease is a natural process, and predation is a natural process. As for letting nature take its course, what about dogs chasing birds is not natural? I asked how the GGNRA rationalizes that a dog chasing a common shorebird warrants a ticket (we must protect park resources), yet if the same shorebird is brought to them because it is injured, they are satisfied to let it die? I asked then why is it that since they choose (and I believe erroneously) to define dogs as predators of birds, why are they then not considered part of the natural process at the beach and ignored just like every other predator?

He responded that if they received a report that a dog was attacking an injured bird they would most certainly respond. He advised me the GGNRA considers dogs to be an unnatural part of the park as they are associated with human use of the park (which is also by inference an unnatural intrusion into the park areas). Those of us who thought this park was created for our recreational use had better get used to the idea that the Park Service regards us as unwelcome intruders into their "wildlife protection area".

I went on to point out to him that I did not want to hear him defining dogs as predators or complaining about dogs attacking birds as my dog helped me rescue this bird this morning and has done the same numerous other times. My dog has alerted me to hypothermic birds that are still alive, and he won't leave until I pick them up and take them to safety. My dog will chase off ravens that are attacking an injured bird who is unable to effectively defend itself and actively chase those ravens away while I pick up the injured bird. Earlier this year we rescued a grebe, today it was a common shorebird. I told him I cannot just run by when an injured bird is actively being attacked by ravens and is screaming

for help. He didn't have a lot to say in this regard.

The GGNRA claims the purpose of limiting the activities of dogs and their guardians is to "protect the resources" of the park. What resources exactly is the GGNRA protecting? The same resources you are content to let die because you don't care to make the effort to transport injured birds to WildCare in San Rafael? When I asked why they would not transport every injured bird brought to them for care, Mr. Merkle indicated the GGNRA preferred to "manage habitats and work on population levels". I am afraid to contemplate exactly what that means, except that the fallow deer in Marin probably have a pretty good idea. Or perhaps it means they want to work on limiting our human population levels in the Park. Or both.

I am disgusted by the hypocrisy of the GGNRA yet again. Their record of park management policy is abysmal. They neglect to assist injured birds even when they are brought to them, they are slaughtering over a thousand deer in Marin merely because they are non-native.

The proposed rule which sacrifices recreational access to protect the plover cannot be justified when GGNRA management has failed to implement the most basic of plans to ensure their well-being.

In this DEIS the GGNRA mentions their concern for wildlife including marine mammals, especially when they beach themselves to rest or when they are injured and on the beach. The GGNRA seems to be able to count the number of reports of beached mammals they receive, however what they fail to mention is that they have no protocol for the visitor to the GGNRA to follow should they come across a marine mammal on the beach. I personally have made numerous requests to GGNRA management for signs to be placed at the beach which would instruct visitors not to approach the beached mammal and where to call to request assistance for the animal. Many visitors to the GGNRA are not local, some have never been to a beach before, and they require instruction so that they can assist the animal effectively. Oddly enough, the GGNRA has managed to post signs up and down the beach to advise us of recreational restrictions regarding fires, camping and the plover, but they cannot post educational signs to benefit marine mammals.

The GGNRA Condoned Other Disturbances To The Plover

To further compromise the GGNRA's argument that the restriction of off-leash recreation is necessary to protect the plover, the GGNRA has taken the plover's alleged summer hiatus as an opportunity to begin bulldozing of the "Plover Protection Area". In October of 2005, when United States Fish and Wildlife Service (USFWS) declined to designate Ocean Beach as critical habitat for the plover they stated the following:

"Although we do not consider these areas [Ocean Beach and Crissy Field] essential for recovery, we do consider them important, and will continue to review projects in these areas that might affect wSP as required by sections 7 and 10 of the Act." The USFWS is previously on the record as stating, "Activities that may adversely affect plovers include sand deposition or spreading, beach cleaning, construction of breakwaters and jetties, dune stabilization/restoration using native and nonnative vegetation or fencing, beach leveling and off-road vehicles driven in nesting areas or at night."

Ocean Beach Plover Protection Area (July 31, 2007)

The picture above was taken during the period when dogs are restricted at Ocean Beach due to the presence of the plover. When OBD OG principals first observed the bulldozers in the Plover Protection Area below, we made a Freedom of Information Act Request of the GGNRA, to determine the purpose of the bulldozing, as well as determine whether USFWS had approved this drastic action. The GGNRA responded to our request, but failed to answer our questions about the bulldozing. We were later advised verbally that there was no correspondence with USFWS to obtain approval for bulldozing, as the plover was not then present. Internal GGNRA records show the GGNRA bargained with USFWS in 1996, sacrificing our off-leash recreational opportunities in order to get USFWS to agree to allow bulldozing in this same area of Ocean Beach. The ESA is very clear that it is not permissible to modify the habitat of an endangered or threatened species when they are not present, but expected to return. One example would be the prohibition of the removal of trees that hold an eagle's nest, even when the eagle is not present or utilizing the nest.

We understand the GGNRA is modifying the beach in this area to minimize the effects of erosion and the drifting of sand on to the Promenade and Great Highway. The GGNRA has refused to acknowledge in any significant fashion that erosion and the progressive collapse of the shoreline limits the areas where the plover can roost and forage, as well as the quality of food source for the plover at Ocean Beach. The narrowing beach puts the plover in closer and closer proximity to all users of the beach, thereby increasing the disturbance to the plovers. These conditions will progress despite the GGNRA's move to ban dogs entirely.

We agree the GGNRA needs to deal with erosion at Ocean Beach. However, it seems unlikely that the GGNRA will admit the obvious: the erosion itself and the GGNRA activities designed to deal with erosion adversely affect the plover to a much greater degree than four dogs who allegedly "disturbed" plovers in the last six years. The restriction of off-leash recreation or the banning of dogs entirely to purportedly protect the plover is a complete ruse.

The photos above were taken during the time period when the dogs are restricted because the GGNRA claims the plover is present. We see the condition of the

plover habitat after the GGNRA has bulldozed to minimize the effects of drifting sand and erosion. The dunes that remain are there because they do have a little beach grass to help hold them together. The tides have run up and behind the dunes that the GGNRA claims the plover inhabits. Note the excessive debris, the graffiti and the remnants of a Christmas tree in this so-called "habitat". Considering the plover resides on elevated dunes of dry sand, preferably without vegetation, it is quite apparent as to why Ocean Beach is not suitable plover habitat. It also underscores the absurdity of the claim in this DEIS that dogs digging have some responsibility for the undermining of sand dunes at Ocean Beach.

GGNRA personnel routinely drive off-road vehicles through the plover habitat in order to enforce the leash law at Ocean Beach. Certainly the GGNRA's "solution" is far more dangerous to the plover than the perceived "problem" (pictures of this activity on file).

In 2006, the Fourth Annual Ocean Beach Turkey Trot was an event sanctioned by the GGNRA (and SFRPD) for 1000 participants. Certainly the GGNRA recognized there would be additional participants who had not officially registered. I and other members of Ocean Beach DOG who witnessed the race estimated 1500 participants. The course for the race was charted directly through the Snowy Plover Protection Area. This was also during a time period where the GGNRA declared an "emergency" warranting the restriction of off-leash recreation in this same area in order to minimize "disturbance" to the plover. The GGNRA, by granting permits for the Ocean Beach Turkey Trot, established that their ban of off-leash recreation is arbitrary, capricious and discriminatory- therefore unlawful.

The 2006 GGNRA Status Report For The Western Snowy Plover Is Fatally Flawed

This is the second report Daphne Hatch (Chief of Natural Resource Management and Science for the Golden Gate National Recreation Area) has produced for the GGNRA to justify the closure of most of Ocean Beach to off-leash recreation due to the transient presence of the Western Snowy Plover (WSP). The first was produced in 1996. The second report, dated November 2, 2006, is the subject of this analysis. Reading Ms. Hatch's report brings to mind an article I recently read from the Journal of the American Dental Association October 2006 Special Supplement. The article was entitled, "Challenges in Interpreting Study Results-The conflict between appearance and reality". It seems that the GGNRA and Ms. Hatch have endeavored to manipulate the data so as to reach a predetermined outcome. Their conclusions falsely give the reader the appearance that the threat to the WSP from off-leash dogs is great. The reality is there is no credible threat to the WSP from off-leash dogs within the GGNRA.

Bias: The 2006 Hatch report presents itself as an "observational study". Observational studies have the least reliability of any type of scientific study because their results can be distorted by many factors. The first of those factors is bias. Bias generally stated is a "systematic error in the design, conduct, or analysis of a study that results in a mistaken estimate of an exposure's effect on the risk a subject faces". Bias is the basis of our skepticism of research to determine the efficacy of a medication when the research is conducted by a clinician who stands to gain financially if the medication is shown to be effective.

Ms. Hatch clearly has an ideological bias against people and their dogs recreating in any manner at Ocean Beach. She was quoted on September 7, 2005 in the S.F. Chronicle as saying, "Ocean Beach without the people is an incredible habitat. But people think of it as a sandbox or their backyard". This is an incredible admission from a high ranking GGNRA official considering the enabling legislation of the GGNRA.

Design: Daphne Hatch's bias is apparent in the design of this study. The objective of this study is to prove her assumption that the present management which allows off-leash dog use of Ocean Beach and Crissy Field is inadequate to protect the WSP from harassment/disturbance and other detrimental effects of chasing by dogs. We learn nothing about the relative harassment/disturbance of the plover from any other source in this study. If plovers are harassed/disturbed 50 times in 5.5 hours by ravens, and one time in that same time period by a dog, is the harassment/disturbance by the dog even relevant? A comparative study model would have been more informative with respect to actually determining what management actions, if any, should be taken to protect the plover from harassment/disturbance in general. Frankly, this comparative study should have been undertaken in 1993 when the WSP was first listed as a threatened species, before the decision was made (and later reversed by the Federal Court) to require the leashing of dogs to protect the plover. However, it could have been undertaken at any time. A comparative study is designed to remove one variable in a situation at a time, and observe the change, if any. An initial period of observation would document the presence of predators (ravens) and their numbers, as well as the frequency of harassment/disturbance from all sources absent any management action. Next, the predators (ravens) being the most serious source of potential disturbance/harassment are removed as much as possible. Rather than killing all the ravens, the GGNRA could have begun a campaign to reduce and remove litter at the beach as a conservative method to reduce the number of ravens. This would entail aggressive ticketing of those who are observed leaving litter at the beach, and resources would be deployed to clear the beach of litter and dead wildlife daily. No one would be adversely affected, and in fact most beachgoers would welcome a cleaner, safer beach. Indirectly, the lack of litter/foodstuff for the ravens would have been expected to reduce their numbers. After the new management practice has been implemented for a reasonable period of time, a second period of observation is

conducted. In this second data collection period, we could assess whether the litter reduction has reduced the number of ravens, and has the reduction in ravens reduced the frequency of harassment; disturbance to the WSP. If the ravens are not reduced, or the frequency of harassment/ disturbance is still unacceptable, the next management measure is implemented. Exclosure fencing could have been placed in the areas where the WSP is observed roosting. This would serve to provide some protection for the WSP from the ravens and any other predators, as well as humans and dogs. Education of the public to give the exclosure fencing a wide berth would be appropriate. After a reasonable period of implementation, a third period of observation would be conducted to determine what effect, if any, this latest management method had upon the frequency of harassment; disturbance of the WSP. There also should be the implementation of an aggressive ticketing policy for all dog owners whose dogs were observed chasing plovers at some point within this process. All of these management measures should have been implemented and assessed for their effectiveness in reducing the frequency of WSP harassment/disturbances before a leash restriction or banning dogs was even considered. This would have been consistent with the mandate to maintain recreational opportunities in the GGNRA.

Conduct: This study exhibits bias in its conduct as well. Clearly, the participants who performed the surveys either had a pre-existing bias to construe the activity of dogs as harassment, or the training provided by Daphne Hatch and her staff created that bias in the participants. Most likely it is a combination of both, as those individuals who volunteered to do these surveys are identified as Golden Gate Audubon Society members. (We should point out that the Golden Gate Audubon Society is on the record as opposing any off-leash recreation in the GGNRA). Ms. Hatch, in her introduction, spells out the definition of harassment per the Endangered Species Act (ESA). Harassment is "an intentional or negligent act or omission which creates the likelihood of injury to wildlife by annoying it to such an extent as to significantly disrupt normal behavioral patterns which include, but are not limited to, breeding, feeding or sheltering". Ms. Hatch seems to use the terms harassment and disturbance interchangeably in this report, so we will generally refer to it as harassment/disturbance. Harassment/ disturbances are not well defined in the portion of the study where they are enumerated for Ocean Beach. However, in the Crissy Field portion, there is more description provided for the harassment/disturbances observed. In one case, harassment; disturbance of a plover by a dog was described as "alert posture -stood up and increased vigilance" (in other words, the plover lifted his head up and looked around). Compare this "disturbance" that was classified by a volunteer and the authors of this study as an incident of harassment to the definition of harassment as provided by the ESA. They are clearly inconsistent. In this study, the authors and participants classified activity as harassment/disturbance that does NOT meet the definition of harassment provided by the ESA. This is a classic example of examiner bias in the conduct of this study. This is more precisely identified as "misclassification" and serves

to invalidate the data collected and conclusions drawn in this study.

Analysis: Analysis of this data is compromised because the data itself is in question. Another factor that makes analysis of this data practically impossible is "confounding" in the design of this study. In this case, "confounding" refers to the fact that this study is not designed to isolate the effect of each component of the beach environment that can affect the plover adversely. For example, an off-leash dog is running at the waterline with its owner and they are some 20 feet from a plover. There is additionally a raven 30 feet and closing from the plover. The plover flushes, and it is recorded as a "disturbance". How is it apparent to the observer whether the dog, the owner or the raven was the source of the disturbance? Practically, it could be any combination of all three. Based upon the premise of this study, it is reasonable to assume the disturbance/harassment would be attributed to the off-leash dog. Is that legitimate? There does not appear to be any attempt made to isolate all other activities within the Park that may adversely affect the plover-they are merely given mention. These would include: Beach patrols in vehicles on the beach, equestrian use of the beach, people walking or jogging, kite flying, littering which attracts predators, the predators (usually ravens) themselves, and removal of kelp or driftwood which are sources of food. No mention is even made of bonfires, camping, litter such as cigarette butts, or the shadows surfboards cast.

Correspondence ID: 4679 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence: Perhaps the most egregious omission in this report is that there is no mention made of beach width. The beach width at Ocean Beach has been decreasing due to erosion. Daphne Hatch's 1996 report concluded on page 10: "Factors other than the number of people or dogs, possibly beach slope and width, appear to exert greater influence over Snowy Plover numbers on Ocean Beach". The GGNRA is quite aware that the number of plovers on Ocean Beach is not directly related to the number of people or dogs present on the beach. However, in this 2006 Daphne Hatch report there is some discussion on page 8 that the plover numbers have leveled off since 2003, and have never matched the level they reached of 85 in 1994. Concurrently, this report discusses repeatedly that since the reinstatement of off-leash recreation, the number of dogs at Ocean Beach has increased dramatically. The report directly asserts the increase in dogs at Ocean Beach is responsible for a greater number of plover disturbances and it is inferred indirectly responsible for the diminished number of plovers. Had Daphne Hatch been intellectually honest, she might have drawn the following conclusion from this data and a study she cites in this report, "Disturbance to wintering western snowy plovers", by K.D. Lafferty. This Lafferty report states "The distance between human activity and the roost peaked at about

30 meters and relatively few people or dogs beyond this distance disturbed plovers" ... presumably because a narrow beach increased the potential overlap between beach users and snowy plovers". Ocean Beach suffers from serious erosion, and hence the beach width has narrowed dramatically, especially during high tides. It could more reasonably be concluded that the narrowed beach width is directly responsible for both the lower plover numbers and the increased frequency of perceived harassment/disturbance of the plover, not the greater number of dogs or their activities on or off of a leash. The narrowed beach width has both eliminated much of the potential habitat for the WSP at Ocean Beach (this is consistent with USFWS critical habitat designation in 2005), and forced all occupants of the beach into closer proximity to the plover, thereby perhaps causing greater harassment/disturbance levels (especially if you construe lifting your head and looking around as a disturbance).

How great are the harassment/disturbance levels really? The way the data is presented in this report is misleading. To put the data in its' simplest form, in 2004 when dogs were required to be on-leash at Ocean Beach, one dog was observed harassing/disturbing a plover in 5.5 hours of observation on weekdays, and one dog was observed harassing/disturbing a plover every 2.5 hours on the weekends. In 2005, when dogs were legally allowed off-leash on Ocean Beach, (and there were many more dogs present) 1 dog harassed/disturbed a plover in 2.4 hours of observation on weekdays, and fewer than 2 dogs harassed/disturbed a plover every hour on weekends. Is this really significant? This report gives us no data regarding the rate of disturbance from any other source, however, the number of ravens far exceeds the number of dogs out at Ocean Beach, and it can easily be postulated the harassment/disturbances due to dogs are dwarfed by the number of harassment/disturbances from the plover's natural predator, the raven.

It is difficult for me to do further analysis of the data, because the GGNRA has illegally withheld the raw data from me. In April of 2006, I requested, by means of a Freedom of Information Act request, all of the data/reports/Environmental Assessments the GGNRA had to substantiate their claim that there were resources in the Park that required protection. The GGNRA responded in writing that such data did not exist. Based upon the representations made in the November 2, 2006 Memorandum from Daphne Hatch and GGNRA Head Ranger Yvette Ruan, the last of the data for this report was collected in February and March of 2006. The data could and legally should have been provided to me in April of 2006. I subsequently appealed this FOIA request to the DOI, and it has not been acted upon despite the fact that the time allowed by law for response has long since expired. The DOI tells me I can sue them for it.

Conclusion: Rational analysis of the situation would suggest that the

GGNRA is really not trying to solve a problem. The GGNRA is merely interested in restricting dogs to leashes or banning dogs entirely throughout the GGNRA. Additionally, when taking into account Ms. Hatch's above comments to the S.F. Chronicle in 2005, one must question the future of both humans and dogs in the GGNRA. Taking into account the data regarding the numbers of dogs chasing either shorebirds or plovers in context of the frequency of the behavior over time, it seems ticketing of the miniscule number of offenders would be appropriate rather than punishing all for the transgressions of a very few. It is a bit like forcing all cyclists in the GGNRA to ride with training wheels because a very few speed through the park.

If GGNRA management complains that they do not have the resources to adequately police Ocean Beach then it provides an appropriate reason to move for reversion of this property. I remind you again of Rolf Diamont's (GGNRA Environmental Coordinator circa 1975) conclusions when the GGNRA had just accepted possession of Ocean Beach from the City of San Francisco - "Ocean Beach: no rules should be enforced here. Ocean Beach is too large and too accessible to control dogs. It would be a logistical nightmare for the Park Service to try".

The Hatch report does not meet the criteria for a valid scientific study. It is more appropriately classified as "junk science" - "a publication that has the tone and trappings of science, but is so fundamentally and demonstrably flawed as to lack any serious claim to credibility". Junk science should never be used as the basis for establishing public policy.

The GGNRA Ignores Scientific Studies That Do Not Serve Their Purposes

1) Our first example would be a U.C. Berkeley Environmental Sciences study presented by Megan Warren on May 7, 2007 that concludes within the GGNRA that the feeding of the Western Snowy Plover does not appear to be negatively affected by human and pet recreation. This is highly significant. Because the WSP does not breed at Ocean Beach or Crissy Field, its primary essential activity is foraging and feeding. If human and pet recreation does not negatively affect those activities, there is no need to restrict recreation in these areas. The abstract is as follows:

Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover

Abstract The Western Snowy Plover (*Charadrius alexandrinus nivosus*) is a small shorebird that has many scattered wintering populations along the Pacific Coast of the United States, including several in the Bay Area. This species has been listed as threatened since 1993 under the federal Endangered Species Act of 1973. For this study I measured disturbance

rates, types, plover responses and feeding time in three different sites in the San Francisco Bay Area to explore the link between recreation disturbance and feeding behavior. I predicted that as frequency of disturbance increased, the birds would spend less time actively foraging and more time alert. However, data showed no significant relationship between feeding behavior and direct disturbance by human recreators. Instead, I now predict that recreation has a more indirect effect on the western snowy plover feeding behavior. Future research should focus on indirect effects of recreation, such as habitat disturbance and food source quality.

2) Our second example is a study, "Predicting the population consequences of human disturbance for Ringed Plovers *Charadrius hiaticula*: a game theory approach" by Durwyn Liley and William J. Sutherland. This study originates from the School of Biological Sciences, University of East Anglia, Norwich, Norfolk NR4 7TJ, UK. This study clarifies the following three pertinent facts:

? Sites that are highly disturbed are not used by breeding birds, and therefore any increase in disturbance levels on these sites will not alter population size ? No published study of a breeding bird quantifies the population consequences of disturbance. This is despite the fact that disturbance has been implied as a factor causing population decline for a wide range of species. ? We think of individuals [birds] as deciding not to breed rather than being prevented from doing so. Such individuals 'queue' for good quality territories rather than adopting a poor quality territory (such as Ocean Beach).

3) The third study originates from the School of Biological Sciences, University of East Anglia, Norwich, Norfolk NR41fJ, UK., and was authored by Jennifer A. Gill, published in *Ibis* (2007) 149(Suppl. 1), 9-14. It is entitled, "Approaches to measuring the effects of human disturbance on birds".

This study clarifies a concept that helps to explain the apparent inconsistency of plover behavior at Ocean Beach and Crissy Field. On one hand, Ocean Beach is a highly disturbed, poor quality beach area (in large part due to erosion). Crissy Field is another highly disturbed beach environment at which the plover does NOT feed or breed (per the first study listed here). The GGNRA maintains that the plover is highly susceptible to disturbance by humans and off-leash dogs. This is why the proposed Rule has been promulgated. However, one must ask the question: if the plover is highly disturbed by human and canine off-leash recreation, and the plover does not feed at Crissy Field, why are any plovers there at all? Likewise, although the food source may be a bit better at Ocean Beach, why would the plover choose to roost there and endure the disturbance?

This study opines, "The principal way in which human presence can impact upon wildlife is by altering the ability of animals to exploit important resources. This can operate either through directly restricting access to resources such as food supplies, nesting sites or roosting sites, or by altering the actual or perceived quality of these sites. Direct restriction of access to resources can occur through animals avoiding areas where humans are present. Changes in the quality of sites as a result of human presence could occur, for example, if predators were attracted to areas with humans, or if the presence of humans reduced the presence of prey species."

For the plovers observed roosting at Ocean Beach and Crissy Field, humans and off-leash dogs are not restricting their access to resources because the plovers are indeed there. The second alternative is that humans and off-leash dogs are altering the actual or perceived quality of these sites. The most logical conclusion is the presence of humans and their off-leash dogs reduces the presence and/or activity of prey species. This theory has been brought up by others such as the SF SPCA (Objections to the Federal Government's Ban on Off-leash Dogs at Ocean Beach, Jan. 9, 1997, page 4), but was summarily dismissed by the GGNRA wildlife biologists. It is disturbing that the subsequent 2006 Hatch study at Ocean Beach intentionally ignores gulls, ravens and crows entirely, so there is no data available that might confirm the presence of off-leash dogs may protect the plover from birds of prey.

However, the statistics in Daphne Hatch's own 1996 study support this theory. During the period prior to this study, the number of plovers at Ocean Beach was increasing, even though there was no requirement for dogs to be on-leash. The maximum Snowy Plover counts for the 1979 to 1985 period ranged from 4 to 16, compared to maximum counts (since 1988) of from 38 to 85 birds (Hatch Report, p. 8).

This UK study also evaluates the methodology of studies like the 2006 Hatch study, which attempt to assess the distribution or behaviour of animals in the presence or absence of disturbance. "A limitation of these types of approaches is that the numbers of animals that would use these sites in the absence of disturbance is generally not known. For example, if the sites with higher levels of disturbance also have lower levels of resource availability (e.g. food or nest-sites) or higher risk of predation, then removing the source of disturbance may have no effect on the numbers of animals in the area."

In actuality, because it is acknowledged by the GGNRA that removal of off-leash dogs or banning will not increase the number of plovers at Ocean Beach, the question becomes, will the restriction of dogs decrease the number of plovers at Ocean Beach? There is evidence to confirm this is probable, as a similar scenario which involved the Bank Swallow has

already occurred in the GGNRA--in an area directly adjacent to Ocean Beach, i.e., Fort Funston. This will be discussed in a subsequent section devoted to Fort Funston.

4) The fourth study was peer-reviewed and accepted on November 12, 1999, and published in *Biological Conservation* 97 (2001) 265-268. The authors are Jennifer A. Gill, Ken Norris and William J. Sutherland. The study is entitled "Why behavioural responses may not reflect the population consequences of human disturbance".

The authors contend, "The effect of human disturbance on animals is frequently measured in terms of changes in behaviour response to human presence. The magnitude of these changes in behavior is then often used as a measure of the relative susceptibility of species to disturbance; for example, species that show strong avoidance of human presence are often considered to be in greater need of protection from disturbance than those which do not ... By contrast, species which do not avoid disturbed areas are often considered as requiring little or no protection from disturbance...From a conservation perspective, human disturbance of wildlife is important only if it affects survival or fecundity and hence causes a population to decline."

What becomes clear after reading this study is that in the GGNRA, Daphne Hatch is defining avoidance behavior and what constitutes a "disturbance" in a very different manner than do other researchers. (This is consistent with my criticism of the 2006 Hatch study). According to this study, avoidance behavior or moving constitutes an activity where the plover actually leaves the site. The 5, 10 or 20 foot flight Daphne Hatch is utilizing as her most severe evidence of disturbance may be relevant in breeding/nesting areas, where movement of that scale can take a plover away from its nest and eggs. In the circumstance where plovers are roosting in an area, this is not classified by other researchers as a "disturbance". From the perspective of these authors, the plovers roosting at Ocean Beach and Crissy Field require little or no protection from disturbance because they stay at these sites.

The Latest Study Of The Western Snowy Plover In This DEIS Is Fatally Flawed

This DEIS relies in large part upon a study by Matthew Zlatunich and Michael Lynes of the Golden Gate Audubon Society. This new study, like the Warren study, was conducted in cooperation with the GGNRA. As noted previously, this 2011 DEIS again fails to mention a 2007 study by Warren that found plovers' feeding was not negatively impacted by recreational activities of humans and dogs. This is critically important because the plover does not nest or breed at Ocean Beach or Crissy Field; its' primary activity here is feeding and foraging for food. Instead of acknowledging the Warren

study, the new Zlatunich-Lynes study was conducted in 2009/2010 at Crissy Field in San Francisco. This study exhibits many of the scientific shortcomings noted in previous studies:

? This study was merely an observational study ? The observational collection of data was performed by Audubon volunteers who had a bias-the GGAS has publicly advocated the banning of dogs to protect the plover ? This study made no attempt to ascertain comparative effects on the plover. There is no discussion of the disturbance level perpetrated by other sources, even though they tell us that data was collected ? Raw data is not provided to the reader ? The analysis appears to be biased because it is based upon incomplete data. For example, the level of disturbance is not categorized in the analysis even though we are told they were categorized in their collection. ? Assumptions are made in this analysis without supporting explanation. For example, they decided to assign the disturbance to an on-leash dog if he was closer to the plover than his guardian. This ignores the possibility the disturbance was due to the number of bodies, e.g. two people walking would disturb a plover to the same extent as a leashed dog and a person.

To clarify the issue of comparative disturbance, it seems odd that although known predators of the plover are acknowledged to be at Crissy Field, no attempt is made to analyze the disturbance they create for the plover. The Common Raven and American Crow are present, yet ignored in the analysis. Beyond this, the California Gull is noted as being present. This is of interest because a recent study using surveillance cameras at plover nesting sites in San Francisco Bay documented California Gulls as being responsible for 25% of all predation of plover nests. (Robinson-Nilsen, Caitlin¹, Jill Bluso Demers¹, Cheryl Strong², and Scott Demers³; ¹ San Francisco Bay Bird Observatory, crobinson@stbbo.org; ² U. S. Fish and Wildlife Service, Don Edwards San Francisco Bay National Wildlife Refuge; ³ HT Harvey and Associates DETERMINING THE EFFECTS OF HABITAT ENHANCEMENTS AND PREDATORS FOR WESTERN SNOWY PLOVER). California Gulls are new to some of these areas-could the decline in the number of plovers at Crissy Field be related to an increase in the presence of California Gulls? This study makes no attempt to ascertain if there is any such correlation.

The Zlatunich-Lynes study notes the number of plovers has been steadily declining since 2005/2006 records. They choose to rely upon previous conclusions that the greatest disturbance impact to wildlife within the Wildlife Protection Area at Crissy Field is caused by dogs, joggers and walkers. The data from this study showed the number of dogs and humans in the plover area spiked in 2008/2009, and declined dramatically in 2009/2010. The number of plovers continued to decline, despite the reduction in recreational disturbance in 2009/2010. This could lead one to

conclude that there is no correlation between the number of dogs and people and the number of plovers present. There is no discussion of this possibility in the data analysis of this study.

The Zlatunich-Lynes study is without merit because it deliberately misleads the reader about the GGNRA's legal obligations to protect the plover. Ocean Beach and Crissy Field are not designated as critical habitat by the USFWS. Therefore, the GGNRA is obligated only to prevent the harassment or taking of the plover within its boundaries. Appendix B contains the legal definition of a disturbance which would constitute harassment and be a violation of the law: "If the observer witnesses a blatant violation of the law, such as a dog owner knowingly and without regard allowing his dog to harass wildlife, the observer shall make note on the comment sheet and shall, upon completion of the survey, file a wildlife harassment report at the park police station..." There is no indication in this study analysis that any observer EVER witnessed this type of harassment of a plover during their observations.

Alternatively, the Zlatunich-Lynes study records "disturbances" which they define as minor, moderate and major - none of which rise to the level of the legal and accepted definition of harassment that is utilized by USFWS and other studies. For example, the Zlatunich-Lynes study states: "a minor disturbance will cause a resting bird to stand". A clear thinking individual can conclude that a minor "disturbance" as defined by this study is really no disturbance at all. Worse yet, when analyzing the number of "disturbances" observed, there is no acknowledgement as to how many of these "disturbances" are actually minor, moderate or major based upon these authors' criteria. It is entirely possible (and I believe probable) that each of the disturbances recorded and utilized to justify the restriction of recreation were merely minor "disturbances". This would be consistent with the conclusions of other studies including the following which states: "... snowy plovers in other areas have become habituated to relatively constant and non-threatening human trail use." (Trulio, Lynne¹, Caitlin Robinson-Nilsen², Jana Sokale³ and Kevin Lafferty⁴ San Jose State University; Lynne.Trulio@sjsu.edu; ²San Francisco Bay Bird Observatory; ³Sokale Environmental Planning; ⁴Western Ecological Research Center, US Geological Survey NESTING SNOWY PLOVER RESPONSE TO NEW TRAIL USE.)

In summary, the Zlatunich-Lynes study and its recommendations are flawed, dishonest and biased. The DEIS advocates recreational restrictions based upon this study. Clearly, the failure in this study to find any violation of the law with respect to the protection of the plover, and the omission of studies that contradict the need for recreational restrictions should render this aspect of the DEIS invalid and discredit the conclusion that recreational restrictions must be implemented to protect the plover in the GGNRA.

The Western Snowy Plover At Crissy Field

This DEIS proposes to ban dogs from large areas of Crissy Field to protect the Western Snowy Plover. It is especially disturbing to note the lack of "vital signs monitoring" in this location because there was a full evaluation of the potential environmental impacts of canine recreation when the renovation of Crissy Field was first proposed. This was a perfect opportunity to obtain a baseline monitoring survey and follow through annually to monitor the effects of the originally permitted levels of recreational activity. Instead, you will see that the citizens were advised the recreational interests would be compatible with the renovation just until the renovation was completed. Then off-leash recreation was banned without environmental study. The recent study relied upon within this DEIS has been reviewed in the Ocean Beach section, but it fails entirely to meet standards the NPS sets forth for "vital signs monitoring" .

"The 1988 Crissy Field Site Improvement Assessment evolved from concepts present in the 1980 General Management Plan. The Crissy Field plan recommends native planting, preservation and enhancement of the site's natural qualities, and preservation of views of the bay while recognizing the needs of existing and future visitors." (Final General Management Plan, Amended Environmental Impact Statement, Presidio of San Francisco, July 1994, p. 5.)

Public concern over the impact of the plan on recreation surfaced in 1994. Wind surfers and dog-walkers were concerned that the new Crissy Field proposals did not address future use of the area for these recreational activities. On November 28, 1994, the Crissy Field project team met with representatives of boardsailors and Rich Avanzino, then President of the SF SPCA, to discuss "the direction [they] were going." (USPRODoo684.)

Meanwhile, the GGNP A encountered problems obtaining donations for the project because of these concerns. Toby Rosenblatt was responsible for raising funds on behalf of the GGNP A for the restoration project. He became alarmed in 1994 upon discovering that NPS officials were not honoring the "voice control" 1979 Pet Policy established when the City donated Park lands to the GGNRA. In December 1994, Mr. Rosenblatt wrote a letter to Superintendent O'Neill and Presidio Manager Robert Chandler, protesting reports that Rangers and Park Police were approaching people in the Presidio, Crissy Field, Upper Fort Mason and Ocean Beach "telling them about a leash law and enforcing the law." Mr. Rosenblatt disagreed with the change in enforcement and warned "[i]t will raise a very major reaction, as you know, in the community and will seriously impact relations with lots of people". He also noted that the enforcement was impacting fund raising efforts for Crissy Field: "I know that a change which implements such a law will hurt our fund raising efforts for Crissy and

elsewhere -in fact that is beginning to happen already." Copies of the letter were sent to Greg Moore, Executive Director GGNPA, and Amy Meyer of the GGNRA Citizens Advisory Committee. (USPRODoo694.)

Nevertheless, the NPS refused to include off-leash recreation in official plans for Crissy Field.

In February 1995, Richard Avanzino met with Superintendent O'Neill, Presidio Manager Chandler and GGNPA Director Moore in order to address concerns "about the continued lack of official acknowledgment and recognition for this vital recreational activity." In a letter summarizing these discussions, Mr. Avanzino noted that the NPS was refusing to provide official recognition because federal regulations require dogs to be leashed, and many NPS staff and powerful environmental groups who want a wetlands established at Crissy Field are opposed to off-leash dogs. NPS also threatened to retaliate if dogwalkers pushed for official recognition during the planning process: "[I]f we advocate publicly for official recognition and status, our efforts will be frowned on and may well be greeted with retaliatory action." The SF SPCA responded by demanding official recognition: "We want the National Park Service to officially acknowledge and preserve off-leash dog walking as it exists today at Crissy Field. We want this acknowledgment to be reflected in the legal and other documents pertaining to Crissy Field, as well as in the official design plans for the site." Copies of the letter were sent to Senators Feinstein and Boxer and Representatives Pelosi and Lantos. (USPRODoo666-7.)

Public pressure continued to build. On March 28, 1995, a public debate over the issue of a wetlands and its potential impact on off-leash dog-walking was held at the Commonwealth Club. A flyer for the lecture, entitled "Wetlands at Crissy Field -Is this a Good Idea?" identified the speaker as James F. Kirkham, Advisory Partner, Pillsbury Madison & Sutro, Native San Franciscan and Outdoorsman." Summarizing the issue up for debate, the flyer noted: "this habitat could include up to half of the entire acreage of Crissy Field, which could drastically reduce the amount of space left for recreational activities, including off-leash dog exercise." (USPRODoo681.) A few days later, on April 1, 1995, a massive Presidio "dog-in" was held to show support for off-leash dog walking at Crissy Field. (USPRODoo679-80.)

In April 1995, Mr. Avanzino met with Superintendent O'Neill and Citizens Advisory Commission members Amy Meyer, Jacqueline Young, and Trent Orr to discuss the status of the 1979 Pet Policy and the issue of inclusion of officially designated off-leash areas in the Crissy Field Plans. A letter memorializing the meeting indicates the following issues were resolved:

1 The "NPS will again honor the Pet Policy"; 2 "Legal counsel for the NPS

has advised" that the Superintendent has "discretionary authority to reinforce through the Compendium mechanism the principles expressed in the Pet Policy"; 3 "This is permitted even though there is some conflict with the Code of Federal Regulations" ; 4 The NPS agreed to include "site-specific plan that clearly delineates off-leash dog walking areas"; 5 The NPS agreed "to public review and participation at the level of the Golden Gate National Recreation Area Advisory Commission of any future changes to the agreed upon off-leash dog walking areas." (Richard Avanzino letter to Brian O'Neill, April 27, 1995.)

To bolster fundraising for wetlands restoration at Crissy Field, the NPS announced (in the San Francisco Chronicle) that it "has no intent to forbid off-leash, even if a large wetlands area is restored along the northern waterfront...all plans either maintain or expand off-leash dog walking. Under any future scenario, more generous areas of the Presidio's northern waterfront will be available to dogs." (Emphasis added.)

On October 2, 1996, the GGNRA issued a "Finding of No Significant Impact" ("FONSI!") for the Crissy Field project. Included in this document were notes about the comments and concerns voiced during the Comment period for the Environmental Assessment ("EA"). The FONSI addressed these concerns as follows: "The Crissy Field Plan ...includes expanded opportunities for off leash dog walking, and the marsh design, as noted in the EA, incorporates features to avoid conflict between other recreational activities, such as off leash dog walking, and wildlife. Section 2.1.2.10 ("Dog Use Areas") provides: "Dog walking is a popular activity at Crissy Field, and both alternatives provide for the continued enjoyment of that activity. An approximately 70 acre area would be available for dog activities. Walking dogs off leash under voice control would be permitted on the Promenade and beach east of the U.S. Coast Guard station, on the restored airfield, and in the East Beach area." Indeed, the Crissy Field Plan Summary confirmed that the proposed plan includes 70 acres for "off-leash dog walking." (Id., p. 10) With respect to protected species, the issue of vegetation was also addressed in the FONSI as follows: "The decision to avoid the introduction of special status species in the restoration was made recognizing the high level of recreational use at Crissy Field anticipated to continue in the future and the concern expressed by many individuals that special status species could cause a change in management of the site that would restrict recreational uses." NPS did in fact replant the federally endangered California sea-blite (*Suaeda californica*) that drowned out during the prolonged inlet closures/non-tidal lagoon flooding phases, and some transplants are thriving. "

Thereafter, the \$35 million in funds were raised, the restoration completed, and subsequently, off-leash recreation was illegally banned at all GGNRA properties, and massive ticketing and harassment of dog walkers

commenced. This directly violated the following agreements between the GGNRA and San Francisco: 1975 Memorandum of Understanding; 1979 Pet Policy; 1980 General Plan; 1982 GGNRA Natural Resources Plan; 1995 EIR/or the Crissy Field Plan, and the 1996 Compendium Amendment. The only redress for these actions by the GGNRA was for three citizens to spend ten of thousands of dollars of their own funds to defend themselves in a criminal proceeding challenging the tickets they were illegally issued. The GGNRA was found to have acted illegally when it rescinded the 1979 Pet Policy and began ticketing citizens for engaging in legal activity.

In this DEIS, the presence of these plantings as well as the Western Snowy Plover are utilized to justify the restriction of recreation in the area. The GGNRA has, yet again, violated the mandate under which this Park was created, violated its promises to the City, reneged on the promises made in the FONSI, and made clear that this DEIS had a predetermined outcome to cut back off-leash recreation or ban dogs in areas used for this purpose before the Park ever existed. The failure of this DEIS to present any credible evidence which would support the restriction of recreation due to the presence of the plover has been discussed in detail in the Ocean Beach section of this comment.

The Bank Swallow At Fort Funston

Beginning in 1991, the GGNRA/NPS began destroying the Fort Funston ecosystem with the premise being protection of the California state-threatened Bank Swallow. The GGNRA/NPS maintained that that recreational activity and "exotic" plants were having a profound negative impact on the Bank Swallow. The GGNRA/NPS never conducted an environmental impact analysis or vital monitoring as required by Federal law before beginning this ecological destruction.

For decades, the Bank Swallow population had been thriving at Fort Funston, with their population increasing steadily even as off-leash dog walking was legally permitted and visitor use increased. In 1982, there were 229 burrows, 417 in 1987, and 550 in 1989--providing anecdotal evidence that dogs and Bank Swallows co-exist and thrive.

In October 1991, the GGNRA/NPS closed approximately seven acres at Fort Funston by moving fences designed to protect the Bank Swallow 75 to 100 feet away from the cliffs in order to construct native plant habitats. (Milestone, J. "Just a Swallow Habitat Restoration Project".) By early 1992, almost four acres were converted to coastal dune and chaparral. At that time, NPS staff began chain sawing twenty-four (24) Monterey Cypress trees lining a trail leading to the beach, and volunteers pulled up erosion-preventing ice plant. Bulldozers were used to level hillocks and bury concrete slabs. In the course of only a few months, volunteers replaced ice

plant with 5,000 native plants in the four acre area. The entire seven acre project was designed to take five years to complete with only 75% coverage of plants. The goal of the project was to increase "natural" erosion and create "moving sand" ecology. With the closures at Fort Funston, the GGNRA/NPS embarked on a unilateral course that was illegal under its own management policies, the MOU Agreement with the City, and the GGNRA enabling statute. At Fort Funston, the GGNRA/NPS pursued a strategy of repressing dog-walking each time it expanded its closures. Concomitant with the native plant expansion, Park Rangers began telling dog-walkers, in late 1991 and 1992, to leash their dogs. In May 1992, Mark Scott Hamilton, Chairperson for San Francisco Commission of Animal Control and Welfare, sent a letter to Superintendent O'Neill expressing concern over "NPS Ranger announcements that GGNRA's longstanding 'voice control' policy at Fort Funston was to be changed effective May 1." Mr. Hamilton pointed out that such action would have serious impact on "overall dog-walking policies within San Francisco's geographic boundaries" and questioned how it could be done without public hearings: "It seems inconsistent with GGNRA's past policies (and perhaps violative of applicable regulatory law) that this change would even be contemplated until after public input hearings."

Public outcry over this action was overwhelming. In response, Western District Director Stanley Albright reassured both u.S. Senator Cranston and Senator Seymour that the GGNRA would continue to abide by the 1979 Pet Policy: "At this time, there is no change in the 1979 Pet Policy which [currently] provides the visitor the privilege of walking one's dog off leash."

Addressing public concern over the closures at a meeting that summer, Head Ranger Jim Milestone, in July 1992, assured citizens that the fences would be in place only one year and the native plants would be compatible with recreational use of the area. (Meeting Minutes of Fort Funston Dog Walkers Association, July 9, 1992.) The next year, GGNRA/NPS expanded the native plant habit an additional three acres beyond the initial seven acre project, again without public review or project approval.

In June 1994, an additional expansion/closure of fifteen acres was proposed without analysis or public hearings. The GGNRA report confirmed that the project was already "expanding into areas beyond our previously agreed to perimeter. Project originally called for removal of all ice plant (a noxious exotic species) from the ten acre Bank Swallow habitat area. This is now complete and new areas outside of Bank Swallow habitat area are now within our grasp." (Project Review Form, Ice Plant Removal, North Tip of Fort Funston, June 1994, emphasis added.) The project goal was to destroy 15 acres of ice plant, using chainsaws to destroy all "exotic" trees and bushes, and using bulldozers where possible. The map attached to this project limited the expansion to the asphalt coastal trail. In fact, this project also was "expanded beyond agreed perimeters" to encompass areas east of the

trail, covering the entire Boy Scout Bowl.

In 1995, Rangers began warning dog-walkers at Fort Funston, Crissy Field, and Ocean Beach that they were going to start enforcing the general leash regulation, 36 C.F.R. Section 2.1s(a)(2). At the same time, GGNRA/NPS announced plans to close ten acres adjacent to Battery Davis under the pretext of erosion control. Ranger Jim Milestone admitted to the public at a meeting in March 1995 protesting the proposed closures that this area was very popular with children for playing Lawrence of Arabia on the steep slope. Dogs loved to chase balls and frisbees at the bottom of slope.

Following these closures, by letter dated March 14, 1995, Superintendent O'Neill promised Richard Avanzino, then-President of the San Francisco SPCA, that the habitat was nearing completion and would not expand south. The GGNRA/NPS also promised that the Battery Davis closure was an approximately 5-year closure during which time it would be revegetated. Signs indicating both areas were closed for native plant revegetation were subsequently placed along the affected areas.

After four years of closures of areas adjacent to the Bank Swallow burrows to off-leash recreation and vegetation revision, in 1995 the number of Bank Swallow burrows plummeted from 924 to 713. A simple review of the scientific literature confirms that Bank Swallows are very tolerant of "human disturbance" at nest sites. Indeed, "many colonies are in human-made sites ... such as sand and gravel quarries and road cuts." (Garrison, B., "Bank Swallow," *The Birds of North America*, No. 414 (1999), at p. 6.) Mr. Garrison is a California Department of Fish and Game

Biologist and an expert on the Bank Swallow. In fact, the only GGNRA/NPS study to evaluate the dramatic drop in numbers of the Bank Swallow concluded that increased predation, not recreational activity, was negatively affecting the birds. (Chow, N., "1994-95 Bank Swallow Annual Report", US04906-32.)

In 1996, the GGNRA/NPS failed to document the colony size, and claims to have lost all data for 1997. In 1998, the number of burrows had dropped to 140, and the GGNRA/NPS closed off the entire slope of coastal bluffs below the hang gliders.

In 1998, the Bank Swallow colony fled the "Bank Swallow Protection Area," to the "exotic" ecology and recreational activity along the south cliffs of Fort Funston. As a general rule of survival, birds leave areas where they are under stress. Despite the obvious devastation to the Bank Swallow colony, the GGNRA/NPS failed to analyze the impact of unleashed dogs on controlling predators of the Bank Swallow. (Hatch Report, p. 85, lines 10-16.) NPS Head Ranger J. Milestone indicated the dogs might have protected

the Bank Swallows by impacting the weasel population. (US03944.) Additionally, observations indicate that the very habitat the GGNRA/NPS was destroying was the habitat most suitable for the Fort Funston Bank Swallow. Such observations confirm that ice plant rootlets are used by Bank Swallows to construct nests. (US04062-3?)

In January 2001, the NPS closed twelve additional acres to public use and the Bank Swallow colony again fled further south away from the new closure.

Because of a total failure to study causal effects of various activities on the Bank Swallow, the GGNRA/NPS has no evidence linking recreational activity with the Bank Swallow decline at Fort Funston. Indeed, the best evidence that recreational activity does not impact the Bank Swallow negatively is the swallows' departure from the fenced off northern cliffs to their present location --an area of continuous recreational activity. The overwhelming evidence indicates that the GGNRA/NPS native plant projects have negatively impacted the Bank Swallow colony.

In fact, NPS documents confirm that Bank Swallow experts do not agree with the NPS/GGNRA contention that the creation of native plant "flyover" habitat is necessary for the Bank Swallows. Notes of a March 16, 2000 phone conversation with Barry Garrison from the California Fish & Game Department, one of the nation's foremost experts on California Bank Swallows, confirm that he "doesn't feel need flyover" (USPR001625) "doesn't necessarily agree that they need a flyover to persist." (USPROD01624). William Shields, Professor of Biology at SUNY, elected fellow of American Ornithologist's Union, leader of SUNY's Conservation Biology concentration (in letter to GGNRA re: closures at Fort Funston, October 2000), reiterates the Bank Swallow's tolerance of human and pet presence and their lack of appreciation for "native plants." "The poor arguments presented in their (GGNRA) plans make little sense to me. The Bank Swallow like other swallows is quite suited to live with humans and their pets" and " ... I do not understand or condone what I believe are their misrepresentations about the needs and safety of the Bank Swallows breeding in the cliffs. ... the notion that the swallows would do better by having more species of insects or even more insects on the shortflyway between their breeding burrows and their main foraging sites at the nearby lake is a major stretch and smacks of special pleading to me."

The GGNRA's dune conversion destroyed the Bank Swallow colony nesting site that the birds had used since 1905.

GGNRA/NPS officials have consistently maintained that after some five years, these "habitat" areas would be reopened for public use. Five years have passed for many of these closures, yet to date, no fences have been

removed.

This DEIS contains no "monitoring of vital signs" that could possibly justify the actions taken previously or the actions proposed in the Preferred Alternative at Fort Funston to limit recreation of people and their dogs. The science, limited as it is, would indicate the Bank Swallow would benefit from the entirety of Fort Funston again being accessible for off-leash recreation as it was in the 1979 Pet Policy. Instead, this DEIS moves to further restrict recreation of people and dogs to presumably "protect" the Bank Swallow. A legitimate safety mitigation would be planting a bramble-type shrubbery barrier along the cliffs, so as to deter dogs and small children (neither of whom can read warning signage) from the cliff edge and preclude accidental falls off the cliffs for all park users.

This DEIS Promotes The GGNRA Practice Of Perverting The Endangered Species Act To Restrict Recreation

Historically, one avenue for eliminating access to the public—the recovery of endangered and threatened species—has been extensively utilized by GGNRA management. This explains the GGNRA's repeated treatment of any habitat, no matter how deficient, as critical habitat. An example of this would be the "plover protection areas" at Ocean Beach and Crissy Field. This DEIS proposes to ban dogs at these areas which is a management restriction more severe than is often employed in "critical habitat". Although for a time the GGNRA attempted to mislead the public by calling this area "crucial habitat", the fact of the matter is that term that has no legal significance. What is significant is that these areas are NOT critical habitat, therefore management measures are legally limited to preventing "harassment" of the plover at that location. Banning dogs is a restriction that is not commensurate with the observed activities in these areas with respect to the plovers.

Additionally, in this DEIS, the NPS designates areas as "potential habitat". The NPS treats "potential habitat" (build it and they will come) as if it were "critical habitat" and embraces all legal restrictions that would enure from that status. An example of this would be at Mori Point in Pacifica. At Mori Point the GGNRA chose to remove 2/3 of the property from recreational access in order to create potential habitat for the red-legged frog and San Francisco garter snake. The GGNRA treats this "potential" habitat as if it were "critical" habitat (which it is not) with respect to recreational restrictions.

The GGNRA has also embarked on a mission to create native plant habitats where no habitat previously existed. GGNRA management alleges this is a part of their obligation to "preserve" the park for future enjoyment, however, this is NOT what they are doing. When you read the overview for Fort

Funston, it is abundantly clear that they are creating these native plant habitats, and in doing so they are destroying parts of the park that existed long before the GGNRA took control. This process is not preserving anything. Additionally, this is in violation of their authorizing directive, as the establishment of native plant areas requires the exclusion of humans from the site, eliminating all recreational activity in the area. Closures at Fort Funston were conducted without a NEPA required environmental impact analysis with regards to recreation or the Bank Swallows, without proper project approval, and without public hearings in violation of NPS regulations, U. S. Department of Interior management policies, and federal law. The GGNRA has implemented similar closures at Baker Beach, Lobos Creek, and in the Presidio. Concerned citizens were unable to obtain specific vegetative plans for the Presidio. Eventually plans to cut down approximately 4,000 trees in order to plant a native "vinegarweed" came to light and were opposed vigorously.

Lastly, the GGNRA has utilized this DEIS to ambush recreation in areas where the public agreed to "restoration" to enhance the environment for "sensitive" species with the promise that recreation would be able to co-exist with these species when the project was complete. The conclusion in the Environmental Review for the Redwood Creek/Muir Beach "restoration" stated:

"The preferred alternative will have short-term minor adverse impacts on visitor and resident access to Muir Beach by contributing to traffic congestion. With the implementation of the mitigation measures, the intensity of these adverse effects will be reduced to a minor level. In addition, the overall effect of the project is beneficial and will improve resident/visitor access and recreation opportunities. Implementation of the Preferred Alternative would not impair park visitors or residents."

The project has been completed, and this DEIS now bans dogs from Muir Beach (they were allowed here off-leash before). Residents/visitors do not see the ban as an "improvement of recreation opportunities as previously promised".

GGNRA Usurps Authority Of The State Of California In This DEIS

The GGNRA intends to ban the recreational activities of dogs and their guardians upon the tidelands that are adjacent to GGNRA beaches. These tidelands remain subject to State "public trust" uses and may not have their longstanding recreational usage turned into purely conservation areas without violating State law and the terms of the permit under which the GGNRA manages some of these tidelands. The GGNRA's position that the public trust doctrine goes into "dormancy" while it manages these tidelands is without any legal support. The 1987 permit specifically allows for

enforcement of federal regulations on these State-owned tidelands only to the extent they are not inconsistent with State law. The "public trust" doctrine has been significant State law since California's admission into the Union in 1850. The general recreational uses of these tidelands are not subject to federal rulemaking of any type.

Compliance Based Management Strategy

The 2,400 plus page GGRNA Draft Environmental Impact Statement (DEIS) purports to offer its proposed alternative (almost everywhere on leash or no dogs at all) and then several alternatives. However, buried deep within the document is the GGNRA's Compliance-based management Strategy-a poison pill, which itself demonstrates that the alternatives are illusory -nothing more than a default to the GGNRA's desired change:

"In order to ensure protection of resources from dog walking activities, the dog walking regulations defined in action alternatives B, C, D, and E would be regularly enforced by park law enforcement, and compliance monitored by park staff. A compliance-based management strategy would be implemented to address noncompliance and would apply to all action alternatives. Noncompliance would include dog walking within restricted areas, dog walking under voice and sight control in designated on-leash dog walking areas, and dog walking under voice and sight control outside of established ROLAs.

If noncompliance occurs, impacts to resources have the potential to increase and become short-term minor to major adverse. To prevent these impacts from increasing or occurring outside of the designated dog walking areas the NPS would regularly monitor all sites. When noncompliance is observed in an area, park staff would focus on enforcing the regulations, educating dog walkers, and establishing buffer zones, time and use restrictions, and SUP restrictions. If compliance falls below 75 percent (measured as the Executive Summary xiv Golden Gate National Recreation Area percentage of total dogs / dog walkers observed during the previous 12 months not in compliance with the regulations) the area's management would be changed to the next more restrictive level of dog management. In this case, ROLAs would be changed to on-leash dog walking areas and on-leash dog walking areas would be changed to no dog walking areas.

This change would be permanent. Impacts from noncompliance could reach short-term minor to major adverse, but the compliance-based management strategy is designed to return impacts to a level that assumes compliance, as described in the overall impacts analysis, or provide beneficial impacts where dog walking is reduced or eliminated"

The entire concept of "compliance based management strategy" is one that

has never before been utilized in any other National Park or National Recreation Area by the NPS. The Draft Plan/DEIS states (page 1725) that "the compliance-based management strategy is an important and effective tool to manage uncertainty when proposing new action" and "has been created" to assure successful implementation and long-term sustainability. It appears this policy attempts to allow the implementation of future restrictions without public notice and comment. This is unlawful and should never have been included in this DEIS.

It is clear that regardless of whatever alternative is finally selected by the GGNRA, the end game for them is the complete removal of off-leash recreation in the GGNRA as well as the banning of dogs entirely from most, if not all, of the GGNRA. At this point we are once again reminded of the revealing statement made by now NPS Director Jon Jarvis: "[I would rather give up those [the GGNRA] properties than have dogs running loose on them. "

In summary, in recent interviews GGNRA representatives have stated that they are forced to ban dogs entirely in many of the former GGNRA off-leash areas provided by the 1979 Pet Policy because, "We do not have the resources to enforce voice control or on-leash compliance ... ". However, it seems to be no problem for them whatsoever to fund staffing resources, expensive surveillance cameras, etc. when it comes to dispensing their "poison pill".

This DEIS (and GGNRA Policy in General) Punishes The Disabled

The disabled are given no special consideration by the GGNRA/NPS. As stated by San Francisco City Attorney Louise Renne (in a letter dated December 19, 2000):

"In addition to receiving numerous complaints regarding the closures at Fort Funston, members of the Board of Supervisors have been contacted by members of the public protesting the removal of pavement from the Sunset Trail, which was closed in November 1999 and reopened in March, 2000. Organizations such as the Golden Gate Senior Services have complained that a major portion of the trail is no longer paved and is therefore inaccessible to persons with limited mobility. We are writing to request a written response from the GGNRA explaining how this diminution of recreational opportunities is consistent with the GGNRA's responsibilities under the Section 504 of the Rehabilitation Act of 1973 (9 U.S.C. 794). Please include in your response a description of the GGNRA's plan to make its programs accessible to persons with disabilities, including those with mobility impairments".

The Sunset Trail is still closed to the public (including those with

disabilities), and the Preferred Alternative would restrict more of the trails the disabled might possibly access at Fort Funston to recreate with their dogs.

At Sweeney Ridge in Pacifica stands the Portola Monument, considered to be the most historic site in the GGNRA. When the GGNRA took control of this property, it closed the access road off to cars, thereby preventing the disabled or mobility impaired from accessing this site. The hike from the current parking spot is 2.5 miles to the Monument, with an elevation rise of some 1,000 feet. The GGNRA has made no legitimate effort to remedy this situation, despite complaints from the City Council in Pacifica, and groups representing senior citizens. This DEIS further restricts access to this portion of the GGNRA.

Perhaps the best indicator as to how badly the GGNRA treats the disabled in this National Recreation Area is the lawsuit brought by Disability Rights Advocates against the GGNRA several years ago. According to the suit, the federal recreation area is discriminating against people with disabilities by systematically excluding them from such areas as restrooms, visitor centers, historic sites, trails, pathways. One of the plaintiffs attorneys explained that at the Marin Headlands, the visitor center has a ramp, "but to a third-party evaluator, it was so steep as to be inaccessible and dangerous. Alcatraz offers a tram, but it only holds two wheelchairs ,theyjust don't have the capacity. At Muir Woods, one of our plaintiffs has had problems with paved trails. GGNRA hasn't kept the paved trails in a condition that allowed her to use them."

Federal laws since 1973 have obligated Golden Gate National Recreation Area to provide reasonable accommodations for persons with disabilities. Having to hike 2.5 miles to see Portola's Monument may be inconvenient for the average citizen, but it is impossible for an individual with a physical disability. The Sweeney Ridge/Portola Monument situation is a representative example of how when making decisions regarding access the GGNRA always chooses less access. The judge in this litigation sent both parties out to mediation, yet after a time the parties were sent back to the court as there was a complete failure to come to any workable conclusion. Therefore, it cannot be asserted the GGNRA did not recognize the problem- the reality is that the GGNRA has no intention of remedying the problem, unless forced to by the Court. This DEIS is consistent with this pattern of practice.

Environmental Justice

The issue of Environmental Justice, as it is postulated in the DEIS (P.31), is offensive at best. To claim that ethnic minorities are dissuaded from visiting the park because dogs are present is a perversion of the data. None of the 20

or more recommendations in the study about what the GGNRA could do to increase accessibility by minorities includes banning or restricting dogs.

The study was flawed in that it was a small sample of non-randomly selected people who were largely unfamiliar with the GGNRA (only 1/3 had visited at least one GGNRA site in the past year). This creates a situation where you are obtaining opinions about the GGNRA from people who have not experienced the GGNRA to any significant degree. You are likely only measuring their perception of the GGNRA, not what actually occurs there. The responses obtained from this study might be well suited to establishing a public relations campaign for the GGNRA, but not establishing park policy.

The study itself says the goal of the study is to "realize the park goals of understanding how to improve 'connecting people to the parks' and how best to engage under-represented communities in plans and programs"-it was a public relations survey. What the study overlooks is that dog walking connects all different kinds of people to the parks. Had the subjects in this survey been to Fort Funston or Crissy Field recently they would have seen a wide diversity of people --seniors, kids, disabled people, Asian-Americans, African-Americans, Latinos, Pacific Islanders, all there with dogs. Compare that mix to any other GGNRA park activity (with nowhere near the diversity) and the "we have to restrict dogs to protect ethnic minorities" argument appears misguided and somewhat condescending.

Respondents who did visit the GGNRA express no apparent problem with dogs recreating with people. A quote from P-42 of the SF State study: "I go to the beach ... When I look at the ocean I could totally relax and let my imagination run wild. I feel that life in America is truly wonderful when I watch people fishing, jogging, playing and walking their dogs."

An interesting observation: the GGNRA talks about protecting access for ethnic minorities who don't come to the GGNRA, but hypothetically might come to the park if there were changes. Who will protect access for the ethnic minorities who DO come to the park to enjoy off-leash recreation?

Suffice it to say that Environmental Justice would appear to be a specious argument at best for restricting the access of people with their dogs in the GGNRA.

Protection Of The Cultural Resources

The idea that cultural resources such as buried missile silos at Fort Funston require protection from dogs trampling, digging or urinating is far-fetched at best. I would point out that the larger size and weight of humans would be a greater threat to trample notable sites than would dogs. With respect to

missile silos at Fort Funston I would not assume all urine deposited would be that of the canine visitors. The GGNRA still has not installed any permanent bathrooms for the many human visitors at Fort Funston. In fact, it seems the GGNRA has little regard for the enjoyment of these resources.

I would also point out the GGNRA has failed miserably in their restoration efforts for facilities such as the Cliff House which are within the Recreation Area's boundaries. The new facility is quite unaesthetic, and popular restaurants within have been altered and have lost their popularity. I have talked to many visitors who are familiar with the previous incarnations of the Cliff House. They always express their disappointment and/or outrage as to its boxy appearance with the service entrants in the most visible area. There used to be a line down the hill for the Sunday brunch at the Cliff House, now it is empty. Our cultural resources are in far greater danger from GGNRA management and their "restoration" plans than they are from dogs.

Safety In The GGNRA The DEIS states: "Most of the issues related to the health and safety of park visitors are related to their encounters with unruly/aggressive dogs". The actual Law Enforcement citations were obtained and catalogued by interested dog guardians and the chart below is the result of their careful analysis. As you can see, the incidents involving unruly or aggressive dogs comprise only 2 percent of the total incidents Law Enforcement reported in the GGNRA. Remarkably, these bite/attack incidents only occurred once in every 1.36 million park visits. 93 percent of the time, Law Enforcement was dealing with human-specific incidents. Clearly this issue of park safety for visitors and staff being compromised because dogs are present has been entirely overblown to justify the radical recreation restrictions the GGNRA is promoting in this DEIS.

Another safety issue brought up in the DEIS is dog feces. It is disturbing that the GGNRA brings up a multitude of diseases or health risks associated with dog feces, yet provides no statistics about disease contracted by people from dog feces. It is my understanding the data to support this "potential" risk is nonexistent.

A related topic in this DEIS is the extensive maintenance dog areas require. For example, statistics are provided for the high cost of trash removal at Ocean Beach. As a daily visitor to Ocean Beach, I must point out the vast majority of the trash is not dog-related, but people-related. I have not as yet seen groups of dogs huddled around beach fires drinking and eating for hours, or groups of dogs enjoying a beach picnic. It is unfair to allocate excessive maintenance costs for trash removal to dogs. At Fort Funston, the complaint is that they must empty trash more often because it is heavy due to the large volume of dog feces. It seems dogs, and their guardians cannot win in this DEIS. On one hand, they are accused of failing to pick up dog feces, and on the other hand the GGNRA complains the trash receptacles are

heavy because of all the dog feces in the trash!

In reality, the safety issue with respect to dogs is a disingenuous argument at best. GGNRA management has sacrificed safety of the public repeatedly when safety comes into conflict with their "restoration" agenda. For example, the GGNRA was happy to spend over a million dollars at Mori Point to construct a bridge so that frogs could migrate from their current habitat on property outside the GGNRA to the "potential habitat" the GGNRA had spent another million dollars to create at Mori Point. Previous to the construction of the bridge, the frogs would have been required to cross the emergency access road for Sharp Park and Mori Point. In building this bridge, the GGNRA destroyed the original access road. Consequently, there is no direct way for emergency vehicles to get out to these popular public properties should there be an emergency.

With respect to management in the GGNRA, their high cost discretionary projects (e.g., the \$12 million spent by the GGNRA to create the new Giacomini Wetlands in Marin, the aforementioned bridge to nowhere at Mori Point always take precedence over everything else most notably public safety. Budget cuts enforced by the GGNRA in spring 2008 cost nearby Presidio Fire Station NO.2 the use of their ambulance, and could have made the difference between life and death for a woman found hypothermic at Rodeo beach by a maintenance worker.

Correspondence ID: 4680 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Water Quality In The GGNRA

It is interesting to review the water quality findings in this DEIS. Although it is asserted dog feces are a significant component in water bacterial contamination, once again the DEIS is short on facts and misleading as well. The DEIS refers to a substudy of the San Francisco Sewage Master Plan which determined that bacterial contamination of waters off Ocean Beach was significant due to dog fecal matter deposited along the shoreline (NPS 1999, 21). The difficulty with this reference is that it cannot be located. It does not exist.

What I find much more relevant is the Annual Report by Heal the Bay. This year's report just came out and Ocean Beach receives an A+ ranking at Balboa Avenue year-round excepting a B ranking during wet weather. At Lincoln Avenue there is an A or A+ ranking year-round excepting a B ranking during wet weather. At Sloat, the ranking is an A or A+ all year-round in wet or dry weather. Clearly dog feces are not creating a problem at

Ocean Beach. Further, the 2010 Heal the Bay report acknowledged that in the summer nearly all beaches had a clean bill of health. But in the winter, when heavy rains cause untreated sewage to flow into the bay and ocean, bacteria hit perilous levels in some areas. Deb Self, Director of San Francisco Baykeeper said, "We have a massive, rampant problem with human waste." Among the worst offenders is Baker Beach, where raw sewage leaking from old pipes and overflowing storm drains flows into Lobos Creek and forms a pool at the south end of the beach.

Clearly, most dog guardians are picking up their dogs' feces, and the relatively few instances where people fail to pick up after their dog, while not excused, do not constitute a threat to our water quality.

Effect Upon Surrounding Parks

This DEIS fails to meet NEPA requirements by omitting an analysis of the effects of the proposed change on park properties in the cities and counties where the GGNRA now owns large swaths of recreational resources. However, when reading the DEIS, it seems pretty clear what the effect would be. From the DEIS itself: "High numbers of incidents occur because of the large number of people that use the site at one time, and the high number of dogs off-leash at the site.. " Certainly the GGNRA would acknowledge that this is precisely what will happen to parks outside the GGNRA should they close down 90% of the GGNRA's off-leash acreage as the Preferred Alternative would do. This is an unacceptable outcome.

I would also point out that the City and County of San Francisco has an ordinance (San Francisco City and County Health Code; Article I; Section 41.12; Paragraph (c); Subparagraph 5) that, among other things, requires dog guardians to provide their dogs with adequate exercise to maintain muscle mass and appropriate weight. Therefore, the issue of whether or not to exercise dogs when access has become severely restricted is not optional. Dog guardians will be forced to do what they have to in order to comply with San Francisco law.

This Agency Action Will Not Resolve Litigation

In recent history, litigation has been the only recourse the taxpayers have had to combat this abuse of power by the NPS/GGNRA. And, in fact, the NPS/GGNRA was forced to reinstate off-leash recreation in the GGNRA following a Federal Court order in 2005. Should the NPS/GGNRA proceed with any of the alternatives propagated in this DEIS, litigation to have this DEIS declared unlawful; or litigation by San Francisco to take back some of these properties will become a necessity.

Duty To' Preserve -This Agency Is Responsible For Resource Degradation

The greatest threat to the long term health of the GGNRA properties is the failure of GGNRA management to implement and use effectively a "Vital Signs Monitoring" program. Ecosystem changes GGNRA management has made until now to "preserve the resources" of the Park would not have been approved had a "Vital Signs Monitoring" program been utilized. The NPS / GGNRA has destroyed large areas of the Park in an attempt to remake the Park environment in the vision of a nativist ideology. These actions are in direct violation of the enabling legislation for this National Recreation Area. The DEIS' Preferred Alternative proposes additional changes purported to protect wildlife from harassment. The data indicates the unintended consequences of ecological changes GGNRA management has implemented without the benefit of "Vital Signs Monitoring" have proven to be a far greater danger to wildlife than dogs. The scientific data presented in this DEIS does not adequately support the Dog management changes GGNRA management has made subsequent to the 1979 Pet Policy, or the changes they seek to make in any alternative proposed.

Conclusion

The only conclusion one can possibly draw from the evidence produced in this comment is that this DEIS along with its preferred alternatives and the compliance based management strategy are not based upon science or data, but rather the product of a predetermined outcome. I would expect no less from an agency whose top authority, Director Jon Jarvis, is on the record as stating, "I would rather give up those [the GGNRA] properties than have dogs running loose on them. "

After consulting with several knowledgeable legal resources, it is my opinion that this DEIS is unlawful, biased and so badly flawed, it must be thrown out. The GGNRA still has the ability to codify the original 1979 Pet Policy as a Section Seven Special Regulation. New lands should maintain the historical use upon inclusion and "vital signs monitoring" should be implemented to determine whether subsequent changes must be made to protect resources. Should the GGNRA fail to heed these recommendations, San Francisco City and County could remedy their issues by formally taking back their affected properties by enforcing their contractual reversionary clause. Unfortunately, this would be of little assistance to Marin and San Mateo counties. Therefore, it would be likely that those counties would pursue Congress to implement a Section Seven Special Regulation to ensure recreational access as was originally intended when this National Recreation Area was created. The third option would be to transfer the GGNRA to another Federal agency such as the Forest Service, where sound principles of land use and planning are a part of their management policy. Should these properties remain under the management of NPSjGGNRA, there must be

strict oversight by Congress. Proper safeguards must be put in place to ensure that the sound principles of land use planning and management are adhered to by the GGNRA on a permanently basis.

Correspondence ID: 4681 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

I am a senior citizen resident of San Francisco who has frequented the park areas at issue for over twenty years. Although I frequently take advantage of access to other units of the National Park system, continued access to the different urban park experience of the GGNRA is very important to me.

I began using these park areas because of the opportunity to walk my dog on leash. That introduction to the park has led to an ongoing experience that is highly important to me and to my quality of life and health. Now that I no longer have a dog to walk, I continue to treasure the urban park opportunity, but believe it would not be the same and will be substantially less attractive and accessible if off leash dog walkers are unreasonably limited.

I do not think it will be safe to walk alone in the Fort Funston or the Ocean Beach areas if dogs are not allowed. Dog walkers seem to constitute the biggest regular park user group, and their absence would decrease the human population so much as to render those urban park areas unsafe except at the busiest times of the week. Dog walkers are out there rain or shine and create a community of users. Like going to a children's playground or church, people seem to act better when in these areas. Dog walking areas tend to be a more polite cooperative social community than do locations without the calming presence of pets. Off leash opportunities add to this park quality.

Consequently, if you limit the dog walking, I think you will end up changing the atmosphere of the beaches and Fort Funston to such an extent that you will end up spending increased money on park police patrols to handle the resulting danger that will move in when the dog walkers are removed. The DEIS does not adequately consider such probable collateral consequences. Also, by concentrating the increasing number of enthusiasts in smaller and smaller areas, you will create conflicts and problems that otherwise can be avoided or minimized. My view is that dog walkers, like other hikers, might in fact have less impact on a given area if the use is dispersed over a larger area. The DEIS does not seem to adequately consider whether the impact is greater or less with concentrated or dispersed use. This factor impacts both the recreational access impact and environmental

impact. The DEIS and other policy considerations should look at this carefully. It is insufficient and absurd just to look at whether the impact will be higher or lower as to a specific area where park use is limited. The question should be what is the overall park impact of the change.

Similarly, the DEIS insufficiently considers the impact of the proposed changes on San Francisco City parks and other parks in the area. The impact will be profound. Any decrease of off leash dog walking access opportunities in the GGNRA should be mitigated with replacement access opportunities at like similar type areas within the GGNRA.

Nor does the DEIS adequately consider the increased enforcement cost and public relations nightmare the GGNRA will face if it makes further dramatic limits to park access. Access has already been curtailed greatly. The GGNRA should carefully consider whether it wishes to take on that battle. Such a choice to create unnecessary conflict is all the more unsound in light of the past difficulties the GGNRA has suffered as a result of the irregularity of the GGNRA's campaign to restrict access.

I do not think it appropriate to deviate significantly from the existing pet policy. It has basically worked well for many years and serves the GGNRA goal and public interest as well as can be expected. I think the Advisory Commission got it right in 1979 when they carefully evaluated where the dog walking could best be accommodated within the entire recreation area and concluded that the designated off leash areas were the locations where such recreational use would have the least adverse environmental impact and the least impact on other recreational activity.

I enclose and incorporate a copy of the April 11, 2002 letter and exhibits I previously sent concerning the suggested changes to the existing off leash recreational access. Please consider those comments as part of my public comment on the current DEIS as the same public policy considerations apply now. Particularly, please consider the more detailed explanation in the letter at page 4 of my comments that regional impact should be considered and the GGNRA should meet its prior commitment to consultation and coordination with local entities consistent with the prior GGNRA promise that:

" As the primary regional source of recreational opportunities, GGNRA/ Point Reyes will be planned and managed as one element of a Bay Area park system. Therefore, regional supply and demand factors must be considered." (GGNRA web site document p. 198: "Consultation and Coordination with Others") The current DEIS does not do so and on that basis alone must be abandoned or reworked. Please carefully consider the more detailed specific comments I made about the recreational needs of San

Francisco and the potential adverse impact thereon.

I think that the greatest real impact of the DEIS Preferred Alternative would be to drive humans out of the park. The DEIS should be honest about that and evaluate whether that is really consistent with the GGNRA enabling legislation and proper management goals. Certainly the impact of decreasing human user access is a much greater factor than whether those humans are accompanied by a canine companion. That bottom line impact should be honestly considered ' does the GGNRA want more or fewer park visitors? The GGNRA should fulfill its mandate as a gateway park.

The DEIS does not appear to reflect consideration of the great amount of public input already submitted on the pet management policy topic. I suggest that you consider the public comments previously made to the Advisory Commission, the conclusions of the National Advisory Panel, the careful comments previously solicited by the GGNRA and the two court decisions concluding that the GGNRA was dead wrong on its analysis of the scope of the need to consider the public and local concerns.

Given the GGNRA's mistakes in the past in this regard, and the possibility that the Court was correct in concluding that the GGNRA was attempting to "railroad through" its agenda and render its preferred plan a "fait accompli" regardless of the public comment, the GGNRA should error on the side of extra caution in carefully evaluating the local concerns and local impact. Protections must be in place to ensure that the analysis is unbiased and transparent.

The proposed change is unnecessary, is bad policy, will lead to bad consequences for the GGNRA in reputation, park quality and user access and will be unreasonably expensive. Don't try to fix something that isn't broken. If anything, off leash access should be increased to the prior 1979 Pet Policy levels. I believe that the access use should be dispersed so that there is less potential for overuse conflict and impact. The DEIS fails to evaluate the environmental and recreational access impact of its prior closures. If the prior changes had negative impact, why repeat the mistake without carefully considering the consequences of the prior closures and use limitations.

The DEIS also is inadequate and non compliant by failing to consider the impact of the change. Instead, the DEIS focuses on the impact of the existing use. The DEIS fails in this way by considering only whether there is impact of a current use that can be reduced in a specific area. If one were to consider the impact of closing down a freeway, it would be absurd to consider only the impact on the specific land covered by the freeway without considering the impact on the nearby streets and surrounding areas and potential increased danger and pollution. I highly recommend, that

access to the Fort Funston area be restored to the scope of access existing prior to the closures in 2000. Those closures needlessly fenced the public out of the areas of the only large sand dune in the Bay Area available for children to play on. Please consider the specific area recommendation I listed on page 5 of my attached April 11, 2002 letter.

When the voters were convinced to transfer Fort Funston, several parks and their entire municipal beach to the National Park Service the voters were promised that their recreational uses would not be limited if they approved the transfer. Please do not break that promise!

Christy A. Cameron

Enclosure incorporated as public comment: April 11, 2002 Christy Cameron correspondence to Superintendent O'Neill with Exhibits A-E Dear Superintendent O'Neill:

It is with a heavy heart that I sit down to write to you once more about the continuing depressing and unnecessary restrictions on recreational access in the Golden Gate National Recreation Area (the "Recreation Area"). In spite of efforts to call it the Golden Gate National Parks, it is not a National Park, it is an urban Recreation Area.

I have a heavy heart because I fear that my efforts will be in vain, that they will not truly be considered by you or your staff. I fear that the ANPR is a "phony" pretense of taking public comment so that you and your staff can pretend that you have to eliminate off leash dog walking in the very small portion of the Recreation Area where dogs have been permitted to run under voice control for 40 or more years, 20 of which were under a Pet Policy adopted by your office.

You are now claiming that the Pet Policy was implemented "in error and was unofficial". This contention is nonsense! It was adopted and implemented because it was exactly the type of existing recreational activity contemplated by the enabling statute mandate to operate the park to provide for the maintenance of "needed recreational open space." (16 USC 460bb) That specific recreational mandate overrides the application of a general regulation, such as 36 CFR 2.15. (See 16 USC 1c) Exhibit A, contains a few of the many letters from the U.S. Department of the Interior including from Regional Directors Reynolds and Albright, acknowledging the 1979 Pet Policy. For instance, your March 19, 1999 letter to Congresswoman Pelosi confirmed the Pet Policy as developed with the Advisory Commission:

"As you are probably aware, GGNRA has adopted a pet policy that is more liberal than pet regulations at other national park sites throughout the country. In all other areas of the national park system, pets are required to be

leashed at all times and are, for the most part, excluded from all but developed areas. GGNRA has, with the assistance of the park's Advisory Commission, established a pet policy that allows some opportunity for visitors to enjoy a few designated areas with their pets under less restrictive circumstances. Certain areas of the park have been designated as voice control areas where pets are permitted off-leash. Other sites are open only to leashed pets, and some portions of the park are completely closed to pets in order to protect sensitive resources. This policy is designed to accommodate the many different user groups within the park as well as to fulfill our mandate to protect natural resource values of the park. We believe our present policy provides a balance between pets in GGNRA and the protection of park resources."

Therefore, it is clear that the Pet Policy was officially adopted and confirmed over the years, not just by the Advisory Commission as the ANPR suggests, but by the Park Service. The Park Service even published a brochure entitled "Enjoying the Park With Your Dog" (circa 2000) which explains "voice control" and lists numerous places where visitors can take their dogs off leash. (See Exhibit B, page 2, Where Can I Take My Dog Off Leash?)

I believe that the 1979 Pet Policy is still operative; it has not been legally revoked. Because of the enormous public outcry and controversy surrounding the Parks Service's efforts to eliminate long standing and historical off leash recreation, revocation of the 1979 Pet Policy would require public notice and comment. (See 36 CFR 1.5(b) and *Fort Funston Dog Walkers v Babbitt*, 96 F. Supp. 2d 1021 (2000 N.D. Calif.)) Regardless of whether the Pet Policy was official or "unofficial" as postured in the ANPR, the established off leash recreational access use was in fact a traditional use pattern. By changing that operative policy and the enforcement pattern the Park Service effects an activity restriction which will result in a significant alteration in the public use pattern of the park area, and is highly controversial. The requirements of public input prior to such a closure are triggered by the fact of the change in use pattern regardless of the status of the policy, As you are well aware, 36 C.F.R. 1.5(b) requires that

... a use or activity restriction or condition, or the termination or relaxation of such, which is of a nature, magnitude and duration that will result in a significant alteration in the public use pattern of the park area, ... or is of a highly controversial nature, shall be published as rulemaking in the FEDERAL REGISTER."

Therefore, the starting point of analysis should be whether the long-standing off leash policy and practice should be changed. It is improper, biased and likely to lead to analysis error if the Park Service is allowed to shift the

burden of persuasion to the public. The law is set up to protect the public from unfair changes. The Park Service has flip flopped the process by claiming that the policy has already changed and then trying to place an unsurmountable burden on the public to convince the agency on whether it should even consider rulemaking to establish a new policy. My own view is that the old policy worked just fine, and that the burden should remain on the government to show why it believes it is so important to create new restrictions on the rights of the people to use their parks.

Frankly, I believe that the Pet Policy was suddenly (after 20 years) discovered to be implemented "in error" and therefore "null and void" in order to retaliate against dog owners for exercising their constitutional right to petition the court and to frustrate their standing in court. That is illegal and outrageous conduct. This retaliation against dog walkers will not go un,noticed by other recreational users and thus has a chilling effect on public participation and the exercise of constitutional rights. I believe that such retaliation for the exercise of constitutional rights is, in itself, a civil rights violation. The retaliatory intent is clear on the face of the ANPR notice. The Park Service was planning to close 10 acres for part of the year and after the pretense of public comment that the Court had ordered, the Park Service closed off 12 acres year round. Despite specific Federal Court findings regarding bias, hostility and efforts to railroad though the closure while attempting to avoid consideration of the concerns of the people effected, the GGNRA allowed the same individuals to continue to work on the issue.

The ANPR document reveals a clear and disturbing bias against off leash dog walking. If one were to read it without ever having spent time at Fort Funston, Ocean Beach, Baker Beach, or Crissy Field, one would think there were no senior citizens, children, disabled, or minorities enjoying the Recreation Area with or without dogs. This is ridiculous and absolutely contrary to reality. The diversity at these areas far surpasses diversity at any other parts of the Recreation Area. All ages and types of people come together and get to know one another. Read the comment letters submitted to you; note the number of senior citizens, disabled, children, and minorities that overwhelmingly want off leash recreation to continue. Contrast that to the elitist, primarily white, native plant fanatics that want to fence out the public for their recreational gardening experiments.

The ANPR raises the same bogus pretense of "threatened birds and native plants" that your office used to fence off much of Fort Funston. I have attached my prior comment letter to address these issues. (Exhibit C) The pseudo science and unsubstantiated conclusions have been repeatedly discredited yet the Park Service continues to reiterate the same nonsense like an old broken record. Dogs and birds (and other wildlife) have co-existed for over at least ten thousand years. Frequently birds chose to follow dogs while hunting for insects. The predators of the bank swallow chicks are

hawks, ravens and kestrels, this has been seen by many Fort Funston visitors and documented by Park Service employees. The removal of the ice plant at Fort Funston (resulting in more mice) has contributed to the overpopulation of hungry and cunning ravens scanning the cliff face for bank swallow chicks. The dogs can't fly - they can't pick off the bank swallow chicks. Even more silly is the Park's Service's contention that the Snowy Plover which does not nest on Ocean Beach or Crissy Field beach nevertheless might have its sex drive affected by dogs. Sheesh! What's the matter with you people? Is this how our tax dollars are spent? The Park Service has not produced any competent evidence that dog activity affects shorebird populations. Yet they are willing to curtail an important recreation activity based on nothing more than a politically favored presumption. The Snowy Plover are not even around for portions of the year. They stop over while passing through in route to nesting areas. Why close off the beach during the seasons when the Plovers are not even around?

Since it is clear that there is bias amongst the GGNRA employees that were previously involved in the improper conduct regarding Fort Funston, the prior inadequate comment review and the biased format of the ANPR notice document, please make sure that none of these individuals are involved in the review of the pet management public comments.

The Park Service committed to consultation and coordination with other local, state and federal agencies and cities and recognized the GGNRA would be the primary regional source of recreational opportunities. San Francisco transferred six of its city parks to the GGNRA ' six city parks San Francisco residents have used for decades for needed urban recreation. Now the residents are told that their land is a National Park and that wildlife and so-called "native plant restoration" is the mandate for the Park Service, not recreation. The document attached as Exhibit D, Consultation and Coordination With Others, was downloaded from the GGNRA website. On page 198 this document notes:

"As the primary regional source of recreational opportunities, GGNRA/Point Reyes will be planned and managed as one element of a Bay Area park system. Therefore, regional supply and demand factors must be considered." (Emphasis added)

San Francisco has, on many occasions in the past two years, voiced its concerns over the changes that the Park Service has made to the recreation areas transferred to it. San Francisco is very concerned about the effect the Park Service's actions are having on San Francisco residents. On December 10, 2001 concerned about the harassment of San Francisco residents by the Park Service, the San Francisco Board of Supervisors passed a resolution requesting that the GGNRA not enforce the leash law until the ANPR

process has been completed. (Exhibit E)

San Francisco is a CITY, a geographically small city although densely populated. Perhaps the Park Service has failed to notice that. Although San Francisco has numerous racoons and skunks, it no longer is home to the grizzly bear or any other bears for that matter. Perhaps the Park Service is planning to re-introduce the grizzly bear to the Recreation Area. The grizzly bears could be re-introduced with the poison oak the Park Service was considering planting as part of its "restoration" efforts. The reintroduction of wildlife, such as bears and wolfs, is in many instances appropriate to a National Park located in wilderness areas far from cities and urban areas. The point is that a one-size-fits-all set of management policies for National Parks and Recreation Areas is not workable. Although I do not believe that the Park Service is intending to review the public comment in a fair and unbiased manner, my good faith answers to your specific request for responses are as follows:

1. The Park Service Dog Policy brochure circa 2000 "Enjoying the Park With Your Dog" (Exhibit B) is a good place to start. However, I would include Land's End and all of Ocean Beach as off leash (voice control); this was permitted by the Pet Policy until approximately 1996; the removal of these areas from the off leash area designation was highly controversial and without pubic comment and therefore illegal. It is my position that the Pet Policy continues to be in force in all areas designated by the brochure and including all of Ocean Beach and Land's End.
2. Ocean Beach, Baker Beach, Fort Funston, Crissy Field, Muir Beach should continue to be off leash areas.
3. Mori Point should continue to be off leash as it has for years prior to acquisition by the GGNRA.
4. Trails in Sweeney Ridge and the Marin Headlands should be considered for both off leash and on leash access.
5. The Sunset Trail at Fort Funston should be re-paved so that disabled, seniors, and others with limited mobility can again enjoy Fort Funston with or without a dog. (The removal of the Sunset Trail and the resulting misery it has caused our seniors and disabled is a DISGRACE to the National Park Service.)

The entire tone of the ANPR indicates that rulemaking will not be the "option chosen by Park Service". The Park Service should not interpret its management policies in such an extreme fashion as to render the Park Service incompetent to manage an urban Recreation Area. If the Park Service remains unwilling or unable to operate an URBAN park

(particularly the portion within the city limits of San Francisco, the highest density outside of New York City) with common sense and an open mind as to urban needs, perhaps then the GGNRA should consider returning the property to the City of San Francisco or transferring it to the Forest Service or the Bureau of Land Management. The Park Service should not create regulations and then interpret its management policies in a manner that has the effect of overriding Congressional intent to create a Recreation Area. Congress intended the GGNRA to be an urban Recreation Area. When Congress intends a federal lands area to be a National Park it calls it a National Park. The Park Services's efforts to manage Recreation Areas with exactly the same emphasis on resource protection rather than recreation that it would use in Yellowstone or Yosemite is not workable and if a reasonable accommodation to recreational needs can not be achieved, the Recreation Area does not belong within the Park Service's jurisdiction.

cc: The Honorable Barbara Boxer The Honorable Diane Feinstein The Honorable Tom Lantos The Honorable Nancy Pelosi Respectfully, Christy A. Cineron

Correspondence ID: 4682 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

The Marin Audubon Society appreciates the opportunity to comment on GGNRA's Draft Dog Management Plan/Environmental Impact Statement. Our organization has a long history of working to protect wildlife and wildlife habitat. Knowing that this is a sensitive issue, we have had many discussions and spent considerable time developing our position. Many of our members and Board members are dog owners and like dogs even if they do not own one We visited all relevant sites in Marin County, except for one that we could not find. Generally, we have found the DEIS to be a fairl thorough analysis of the impacts of dogs. We do not however, find that the information and evidence provided as well as the policies and laws support the choice of alternatives that allows dog use and unleashed dogs on many sites.

As discussed below, MAS generally supports Alternative D. the most protective for natural resources. but differs from that alternative for some of the sites. We recommend that all dogs be on-leash in all areas where dogs are allowed in GGNRA, and that some areas be off-leash to dogs to protect resources.

General Limiting dog use is supported by many relevant national policies

and laws. The purpose of GGNRA, as stated in the DEIS, is to offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic and recreational values. Resource policies and guidelines, also noted in the DEIS, state that the NPS will maintain as part of the natural ecosystems of the parks all plants and animals native to park ecosystems; and will achieve this by "preserving, and restoring...native plants and animal, populations and the communities and ecosystems in which they occur....restoring native plant and animal populations where they have been extirpated by human caused actions,... and minimize human impacts on native plants and animals, populations, communities and ecosystems." The Organic Act of 1916 directs national parks to conserve wildlife unimpaired for future generations which is interpreted to mean that native animal life is to be protected in perpetuity as part of the park ecosystem."

The charge for lands under the NPS system is clear ' protect natural resources. It is not the responsibility of the national park system to provide recreational areas and experiences to special interests are they dog walkers, bikers, birders, or others. Uses that do not harm resources and impact other users are provided for, but uses that harm resources should not be allowed. Users, be they walkers, birders, dog walkers or others should stay on trails and other designated areas to prevent damage to natural resources. To us this means that dogs should be leashed and confined to designated roads/trails.

The DER should discuss the implications of adopting the proposed recommendations on other national parks. What is to prevent diversion from NPS policy at GGNRA creating a precedent for relaxing standards that currently guide dog restrictions in the NPS system? Why should GGNRA be an exception?

In addition, the NPS is bound by a number of federal and state laws that are discussed on pages 1109 to 1112. The DEIS should also include a discussion of the recently released STATE OF THE BIRDS 2011 report. This report is particularly relevant because it covers the status of birds on public lands, reveals that most avian species, except for wetland dependent species, are declining throughout the nation and one of the significant threats identified is the presence of dogs in habitats. Specific habitats addressed in the report that exist at GGNRA are grasslands and coastal beaches. The DEIS should include a discussion of the dogs on GGNRA habitats as part of the nationwide problems resulting in declining species in these habitats.

The cumulative impact on wildlife species should be addressed in a nationwide framework. The discussion should in particular focus on the species and habitats noted in the STATE OF THE BIRDS 2011 report that are present at GGNRA. This discussion should address the perspective of

how impacts that occur from dogs in habitats in this region contribute to the nationwide decline in wildlife populations.

Wildlife Impacts The DEIS chapter on Wildlife presents many studies that document and report on the numerous adverse impacts of dogs on wildlife. Several of the impacts of the construction and use of ROLAS, however, are not identified. While fenced ROLAS may work to confine unleashed dogs (some dogs do jump fences) and keep them from running into and through habitats and affect wildlife, the fences would have adverse impacts to habitats and wildlife that should be addressed. Fences that would be constructed would adversely impact the habitats by blocking movement of wildlife through and between habitats. In addition, construction of the fencing would destroy vegetation that is habitat.

The above impacts on wildlife movement and on vegetation from the construction and use of ROLAS should be addressed in the DEIS.

Dogs going off roads walking into and through habitats adjacent to the roads cause a number of impacts that are addressed in the DEIS. Additional impacts include trampling of vegetation, leaving scents, noise, chasing (and sometimes catching) or otherwise disturbing wildlife. These potential impacts should be discussed.

In addition to upland and beach habitats, dogs using fire roads that cross streams may adversely impact water quality that could impact downstream habitats and be harmful to wildlife.

Adverse impacts to vegetative habitat and wildlife would result from dogs that are allowed to walk in the habitats on their six-foot long leashes using fire roads, and trails if that is permitted. This may be a more narrow area, but vegetation trampling, noise, scents, frightening wildlife will occur. There should be a discussion of these impacts and of mitigation to avoid or minimize the impacts. One of the mitigations should be requiring and educating owners to keep their dogs within the confines of the fire roads by requiring dogs to be kept on the fire road itself, and not enter the adjacent habitats.

The discussion of compliance based management on page 802 mentions the use of buffer zones as one of the methods to deal with non-compliance. Please provide a more complete explanation of what this means.

Monitoring/Management/ Enforcement Based on our experience seeing people violate leash laws and other trail regulations over a period of many years in many locations, we have considerable concern about compliance and enforcement, whatever combination of regulations GGNRA eventually

approves.

The Management Plan includes what is referred to as compliance based management strategy. After adoption of the Management Plan, the Park Service plans a 1 to 3-month period of public education, followed by a 1 to 3-month period of monitoring for compliance. Additional educational methods including, signs, brochures, meetings, etc., would be used. The Park Service expects compliance to gradually improve. If it does not, management would move to the next more restricting scenario, e.g. ROLAS would change to on-leash; then on-leash-requirements would be changed to no dogs.

Outreach and Education is planned to take place first. Discuss the plan and method for educating users, distributing brochures etc. Snowy Plover research in Santa Barbara found that the most effective tool in getting the public to comply with restrictions to protect Snowy Plover was person-to-person request. In Santa Barbara they used volunteers who explained why people should stay off the beach during nesting season. Such a program should be considered for use here. Discuss the possibility of initiating such a program. We believe that enforcement of regulations sends the clearest message of what is expected of people. Clear signage should be installed immediately. The signage should explain what is allowed and is not allowed and why, and information about enforcement measures that would be taken. Interpretive information, particularly where special status species are present and habitat information should be included. Signs should also give information about the GGNRA boundaries. At some of the Marin sites, signs were small, obscure and difficult to find. Once adequate signs are installed citations should be issued immediately.

Clear and uniform signage needs to be installed throughout the park. Users should not be able to get away with claiming ignorance of regulations. The signs should explain the regulations; interpret the reason for them and the resource that is at risk. Signage is so disjointed that users are confused about rules, they are unclear about boundaries. In one location, where there are different jurisdictions we had trouble determining where the ownership boundaries were, and we could not even find one of the sites that lacked signs in Marin.

We assume the monitors and the enforcement staff will be different people. How will the people doing monitoring interact and/or communicate with the enforcement staff? Would the monitors have any enforcement authority? Would they contact enforcement staff if there is a significant problem?

Adequate enforcement is essential to ensure maximum compliance. Explain how the enforcement staff will operate? How will the NPS ensure that

appropriate and needed monitoring and enforcement occurs at all sites?

Include a discussion of how different non-compliance incidents will be categorized. Serious non-compliance incidents, such as dogs attacking wildlife, endangered species or a person, should be weighted more than off-leash dogs, for example.

What if the non-compliance involves directing an owner to put their dog on leash and he/she fail to comply. This should receive higher weight than off-leash offenses on-leash areas where the person responds immediately, for example.

Incidents should be used to determine compliance and non-compliance.

How frequently would monitors be stationed at highly used sites? How frequently would they be at less-frequently used sites? What is the cut off between these categories?

The discussion states "If there is "continued and widespread non-compliance occurring over a long period of time at which point the benefits of allowing the use is outweighed by the administrative burden required to manage the use, draining limited resources.... Explain what the "benefit" that is referred to is?

How frequently would enforcement staff visit each site? Explain the .planned sequence for enforcement. We understand more attention will be paid to known-problem sites and we agree with this approach. However, it is important that all sites be visited regularly. How would monitor data be used to increase enforcement efforts at a problem sites.

Will enforcement staff give citations for all serious infractions, such as attacking a person, another dog, running after and or catching wildlife? After an initial warning would citations be given. on the second infraction?

The Management Plan provides that a compliance rate of 75% would be considered acceptable. This is a major concern. In effect it would be giving license to 25% of users to break the law by not complying. 75% compliance is far too low. It is basically an allowance for the 25% who do not comply, particularly if they are locals and understand exactly what they are doing. We suggest a much lower level of 5%.

Complete records should be kept. of all citations and infractions. If the 5% includes repeat offenders (i.e. people who are from the neighborhood or area who know the rules) they should not be counted as part of the 5%. This would be an allowance to them to disregard regulations.

The DEIS should explain how the NPS arrived at the \$1.5 million estimate for the monitoring and interpretation of data. It seems to us that this could be a significant underestimate. What steps would the park take if the funds are insufficient? What activities would be reduced or eliminated first?

Provide a discussion of the typical fine penalties that are levied for dog infractions. What is the range of fines that are levied? Is there some federal guidance for judges in making these decisions, or are they on their own? Are judges fairly consistent?

What is the means of collecting fine monies? Does the procedure guarantee that the fines are paid and not simply ignored?

Specific Site Recommendations As a baseline, MAS supports the environmentally protective alternative D, with certain exceptions for specific Marin County sites and sites with special- status avian species avian species in. San Francisco. In addition, it is our position that on-leash dogs should be allowed on roads (including fire roads) and parking lots only. We do not support dogs on narrow trails. We oppose the use of ROLAs through natural habitats because of the impacts to those habitats and the wildlife that depend on them.

Allowing dogs on roads and parking lots only, is consistent with regulations in all of the other national parks and recreation areas in the nation, so it will not set a precedent for weakening protections in other areas. This is a position that can be clearly presented to the public, is easily understood and enforced. Most importantly, it is also the safest for wildlife and for other users of the park. Regarding specific areas, N. -e recommend the following: Fort Baker ' Dogs should be kept off the beach and no dogs should be allowed in or near the Mission Blue Butterfly habitat. Leashed dogs are okay on the Bay Trail assuming it is on paved areas, and other paved areas, but not on other trails and the Parade grounds The Bay trail is poorly marked at Ft. Baker.

Homestead Valley ' The existing trail is between Panoramic Highway and a neighborhood street. This is a natural grassland area with a narrow dirt trail. We" recommend that dogs not be allowed in this grassland habitat. The Plan notes that "Neighborhood connecting trails may be designated in the future" but locations are not specified. In accord with our long-time position against the construction of new trails in Marin County, MAS recommends against establishing any new trails including unauthorized trails worn by people. These unauthorized trails should be obliterated.

Oakwood Valley ' This area has a trail and a fire road that begin at Tennessee Valley Rd. and that parallel each other for some distance before connecting with other trails. We recommend that on-leash dogs be allowed

on the fire road only; and no dogs be allowed on the trail. We see no reason to allow dogs on both off these redundant trails. GGNRA recommends a ROLA along the fire road which would be fenced and gated. This would in effect be a dog run, a special use area for dogs. We oppose a ROLA because building a fence would destroy habitat and its existence would impede wildlife moving through the area.

Alta Trail/Orchard Fire Road. We support the preferred alternative for this site; that of not allowing dogs on these trails to protect the Mission Blue Butterfly.

Stinson Beach. We support Alternative D which does not allow dogs at Stinson Beach.

Muir Beach. We support allowing dogs in the parking and picnic areas, but not on the Pacific Way Trail unless this yet-unconstructed trail is the actual road. The DEIS maps show the Pacific Way Trail as to be built and leading from the parking area. The EIS should address where this trail would be located. We could not find a description in the DEIS nor did any of the few staff rangers we met up with on our site visit, know where it would be located. Pacific Way has houses and fairly steep hill on one side and vegetated habitat on the other. We could not see any place where such a trail could go without causing significant environmental impacts. For these reasons, in addition to the fact that we have a long-standing policy against constructing new trails, we do not support constructing a new trail. Marin County has hundreds of miles of trails and does not need any new trails. Furthermore, if GGNRA is considering a trail in this location it should be studied and adequately reviewed in its own environmental document, not slipped through in this large DEIS.

Marin Headlands/ Rodeo Lagoon. Dogs should be allowed on fire roads only, not on the beach. Fencing, similar to that at the Muir Beach parking lot, should still be installed across the entrance to Rodeo Lagoon to keep people out. The fencing is about three feet high and has a gap at the bottom allowing wildlife to pass through or over. Dogs could get over or under also, but the fencing, combined with adequate signage, should convey the message that dogs are not allowed.

With the extensive fire road system throughout the Headlands, (remnants of old military uses) there are miles for dog-walking. On-leash dogs should be allowed on fire roads that are currently open to dog walking. Current prohibitions should be continued on fire roads in order to better protect natural resources.

Fort Funston We are commenting on this San Francisco beach area because of the presence of the bank swallow nesting colony. We urge that dogs and

people be prohibited from accessing the area (above and below the nest site) where bank swallows nest during nesting season.

Ocean Beach We are commenting on this San Francisco segment because of the presence of the endangered Western Snowy Plover. It is clear from the information in the DSEIS, that off-leash dogs are a problem for this endangered species. To protect this species, we recommend that no dogs be allowed on this beach, particularly during nesting season. An intense monitoring program should be implemented and enforcement actions taken to protect this species. It is possible that Snowy Plover could use the area during non-nesting times if there were adequate protections for them.

Conclusion Dogs, loveable companions as they may be, are non-native predators in our natural habitats. They illicit an escape reaction in most wildlife (except perhaps large predators) causing interruption of feeding, foraging, resting, mating, and nesting. They are doing; trample and destroy vegetation, leave droppings and their foreign scents. Keeping dogs on-leash does not prevent all of these impacts, but it would provide the best protection for native wildlife and habitats, except in areas adjacent to trails where dogs can reach on the six-foot leashes. Restricting dogs to the fire roads themselves would mitigate that impact. Even dog owners on our Board admit that few if any dogs can be depended upon to be under voice control under all circumstances, such as the presence of coyotes or deer. GGNRA's primary responsibility is to protect the wildlife and habitat resources on public lands and ensure the safety of the pUblc. Leashed dogs are safest for wildlife and also for other people users, as well as for the dogs themselves.

Thank you for responding to our questions and comments.

Sincerely,

Barbara Salzman, Co-chair Conservation Committee Phil Peterson, Co-chair Conservation Committee

Correspondence ID: 4683 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

We are very pleased to see the Golden Gate National Recreation Area (GGNRA) is finally addressing the issue of dogs in our national park. The Dog Management Plan (DMP) is comprehensive and specific, and for that we are grateful. Our comments will address general elements of the plan,

and then specific elements of the plan for areas we know best..

Pervasiveness of dogs: Our concern with dogs, particularly off-leash dogs, is that they impact the entire park in any number of ways. Most obviously is their presence everywhere. Other than Alcatraz or Muir Woods, there is not an outdoor space in all of the GGNRA where one can go without encountering dogs. Considering this is a national park it makes it the only one in the entire system where after humans, dogs appear to be the most pervasive animal. The situation is out of control and it needs to change.

Dog litter: Besides their presence, dog related litter is a significant problem. Though many owners pick up their dog's waste, there are those who do not. In fact nobody cleans up urine. The amount of dog urine, combined with feces that is not picked-up or remains after most of it is removed causes heavily used areas like Fort Funston to smell, thus making it unpleasant for visitors who are not dog owners. It also impacts soil chemistry in ways never explained, investigated to our knowledge, or mitigated. We have no idea what the impact on soil chemistry might be, but it would seem that wherever dogs are permitted, an environmental impact report should be developed to deal with that. That study should identify impacts on microorganisms, invertebrates, vertebrates and plants. Since our National Parks are supposed to protect the resource of each park, it seems incumbent on the National Park Service (NPS) to undertake that analysis if dogs are permitted in any part of GGNRA..

Aggressive dogs: The threat to the general public from aggressive dogs is an issue that should be dealt with. When we used Fort Funston during the 1970s and 80s there were far fewer dogs than now. We were able to walk around with our small children, explore and not be accosted by dogs. There is no way we would even consider bringing children to play in the dunes or ruins at Fort Funston now. The threat of dogs is serious and seems even more so because authorities are so reluctant to publicize dog bites, attacks and even clog use there. We hear from friends that they will not bring children there and won't go there themselves. The same is true for Crissy Field. As much as dog owners and commercial dog walkers use both areas, there are many people who have excluded themselves and quietly gone away. That is not what our National Parks should offer the general public. We understand the 2009 and 2010 reports of dog attacks and complaints about dogs damaging the GGNRA landscape were released during the final week of comment for the DMP. Though we have not been able to review them, we urge that the Park Service take those reports into account when weighing the proposed alternatives. Those reports provide tangible evidence that GGNRA must stop the present practice of allowing dogs everywhere, and must act to protect not only the resource, but the general public.

GENERAL COMMENTS Alternative A: No Action (Continuation of

Existing Management). This alternative is completely unacceptable. It simply violates the National Park Service (NPS) mandate to protect the resource that comprises the Golden Gate National Recreation Area. That resource is being consumed by dogs and the people who allow them to run free in virtually every area of the park.

Alternative B: NPS Leash Regulation. This alternative is generally acceptable. It embodies protections for the resources which are enforced in other National Parks. It does appear to allow leashed dogs on some trails and beaches where they might be expected to be restricted in other parks.

Alternative C: Emphasis on Multiple Use Balanced by County. This alternative provides only limited protection for the resource. In as much as it is for the most part the preferred alternative, our general comments will regard it as such. Our general reaction to this preferred alternative is that it is sufficient in the goal of the DMP is to find a middle ground between the current abuse of the resource by dogs and their owners and the mandate of the National Park Service (NPS) to protect the resources under their care for future generations.

Alternative D: Most Protective Based on Resource Protection/Visitor Safety. This alternative is generally acceptable. It embodies some protections for the resources which are enforced in other National Parks. The fact that it permits Regulated Off Leash Areas is very troubling. Permitting access to beaches and some trails does not appear to be consistent with regulations in place in other National Parks. It would appear successful enforcement of this alternative would be labor intensive and costly.

Alternative E: Most Dog Walking Access/Most Management Intensive. The underlying concept is unsustainable. In a time of diminishing resources, there is no way this alternative can be funded or implemented. There is no funding source outside the general funds available to GGNRA. This alternative is not acceptable.

Voice Control: The concept of voice control should be abandoned. It is not defined and it is not enforceable. If it were defined as calling or motioning to a dog, to which the dog responds on the first or second command, it might have meaning, but given the lack of definition it has no meaning, no means of enforcement and therefore no place in this plan.

Regulated Off Leash Areas (ROLA): ROLAs are not a good idea in this or any other National Park. Evidence from San Francisco city parks, such as Sigmund Stern Grove/Pine Lake indicates dog owners, when given a significant part of parkland, will continue to ignore leash restrictions. Given that ROLAs will probably be used as a compromise to give our parklands to

the dog owning public, but they should be strictly enforced with on site staff that is authorized to give citations to anyone with a dog off leash outside We designated area. ROLAs should not be established in any areas where they can impact natural or historic resources. Dog owners should be required to purchase daily use licenses to use ROLAs so they in fact pay for the regulation and use of these special use areas.

Commercial Dog Walking: This practice should be banned. If it is permitted commercial dog walkers should be required to have a license and to pay all fees paid by the general public. They should be limited to 2 dogs at a time. An attached photo shows a dog walker with numerous dogs at Panama Pt., Fort Funston. It is a case of how out of control dog walking is.

Four dogs: The concept that an individual can control 4 dogs at one time in a public space is pretty unrealistic. It would be much more realistic to limit dogs to 2 per dog walker.

75% compliance: The idea of 75% compliance is unrealistic and unacceptable. With current closures to off leash dogs on most of Ocean Beach, we only have less than 30% compliance with leash laws during the period of mid July 2010 and mid May 2011. Success cannot be measured at a level of poor compliance. We believe the Park Service should establish a success goal of 85% for the first year or the area should be closed to dogs all together. The rate for the following years should be at the 95% level for all beaches and other sensitive habitat areas. Compliance might be supplemented by education and warnings, but that has not worked in the past. It is a simple fact that compliance must be enforced with citations on a daily basis until the desired compliance rate is achieved.

Beaches: Beaches are a particular problem since the resource itself is wished clean with tides and storms and impacts are not to be seen. However there are significant impacts to wildlife that use our beaches. The simplest example is illustrated in the attached photo of the dog chasing Willets on Ocean Beach. From birds as common as Willets and Western Gulls, to the Federally listed Western Snowy Plover, dogs have an incredible impact on birds. For that reason dog use of beaches should be highly restricted. Beach areas known for bird roosting should be off limits to dogs. A practice that would be consistent with NPS regulations would be to ban dogs from all beaches in GGNRA. Since that seems unlikely dogs should be limited to a bare minimum of beach areas. No beach should be entirely open to dogs. A compromise might be to limit dogs to no more than some percentage of any given beach. Given the habitat value of beaches, we would think that limitation should be areas adjacent to parking lots with an outside limit of 30% of the entire beach. That at least would allow space for wildlife. It is important to note that many beaches will have little or no wildlife presence during parts of the year. A survey might be appropriate to determine if a

given beach is in fact devoid of wildlife. In that case other criteria might be used to determine what if any dog use might be appropriate.

SPECIFIC COMMENTS FORT FUNSTON Alternatives A, C and E are all unacceptable for reasons mentioned above. Alternative C, the preferred alternative, is much too permissive and will only perpetuate the culture of destroying the resource. Remember this is a dune-based natural resource, so even seemingly benign uses such as the ROLA between the Chip Trial, Sunset Trail and the parking lot will continue to wear away the under') Ing compressed dunes and will continue the destruction of this unique place. Even

Alternatives B and D do nothing to really repair the damage to the Fort Funston resource.

Alternatives B and D offer some level of protection. We much prefer Alternative B. Regardless of the decision on this, access to the Fort Funston bluffs should be restricted. This is the area most critical to one of California's last 3 or 4 coastal Bank Swallow colonies. People with dogs who walk along the edge of the bluff above the colony cause enormous erosion. Even when they don't cause erosion, their presence causes the swallows to fly from the colony. Disturbance from above appears to trigger the birds to briefly abandon the colony. During that time the young birds are vulnerable to predation, and the disturbance just wastes energy needed for successfully rearing their young. Bank Swallows utilize the beach, the bluffs and the dunes above the colony to gather nesting material and sometimes to sun themselves. The presence of dogs interferes with that process and is an impact.

People who allow dogs off leash, regardless of regulations allowing or disallowing that practice, should be held financially accountable for repaying the National Park Service, and the City and County of San Francisco if they are involved in a rescue, the full cost of any dog rescue from the bluffs and they should be fined for not controlling their dog appropriately in the first place. It is critical that the Fort Funston bluffs be preserved for the present and for future generations. In their own right, they are an amazing resource that the National Park Service has never protected, recognized or interpreted for the public. They show us a cross section of San Francisco geology going back thousands of years. The practice of allowing off leash dogs and the public in general the freedom to destroy those bluffs is a violation of the public trust to preserve such resources. We hope at least this resource will be given the protection it needs when this plan is finalized.

Fort Funston was once one of San Francisco's premier birding hot-spots. Of course sea birds can still be viewed from the observation deck and the Bank Swallows cling to their traditional nesting area on the north bluffs. The

uplands at Fort Funston was found to be an amazing birding resource in the 1970s. It reached its peak during fall migration when neotropical migrants were found to land in its groves of trees. Subsequently it was found that large numbers of migrants common to the Pacific Flyway utilized it. Here are a few examples of the losses suffered at Fort Funston:

The islands of trees around Battery Davis, at the Y intersection and along Skyline Blvd formed migrant traps during fall migration. In reality they were groves of trees with an understory of weedy exotic vegetation. But insects adapted to them, and birds benefited from this strange resource. Since dogs were allowed to overwhelm Fort Funston we have lost most of the understory in those groves. Gone with the understory is the food resource and the migratory birds. Few if any birders even bother going to Fort Funston during fall migration any more.

A particularly large area of coffeeberry adjacent to the Y-grove frequently provided food and cover to mixed flocks of birds that numbered about a hundred. The most common birds were American Robin, White-crowned Sparrow and Western Tanager. All benefited from the fruit of those shrubs. The shrub patch was completely obliterated by dogs and people chasing after them.

California Quail, jackrabbits and brush rabbits were once common at Fort Funston. Prior to that area being taken by dog owners, they successfully bred there. I recall watching 2 particular visitors encouraging their dogs to chase the rabbits. Both told me the dogs never caught a rabbit and I have no reason not to believe them. What they and many others apparently did do is chase the rabbits and the ground dwelling quail to the point they could no longer successfully breed. The stressful impacts of 2 dogs probably wouldn't do much, but the stress from tens or even hundreds of dogs on a small population certainly would. Those animals no longer inhabit Fort Funston and for that matter the rest of GGNRA in San Francisco. Since all three species survived the period Fort Funston was an active military base and the period it was vacated and a little used parkland, it seems their demise can most likely be attributed to the onslaught of dogs that destroyed their habitat. That in itself should be reason to ban dogs, or at least require leashed access to paved trails only.

Attached is a copy of "Birching Ocean. Beach and Fort Funston", an article I originally wrote about birding Fort Funston '11, which appeared in several forms in a number of publications. It serves as a historical reference as to how very valuable this once rich resource was.

The beach at Fort Funston is tricky. Given the presence of Bank Swallows, the presence of gulls and shorebirds during much of the year and the difficulty with access, a minimal concession to wildlife would be to restrict

dogs at least from the portion of the beach from Sloat to Panama Pt.

OCEAN BEACH Unlike Fort Funston, Ocean Beach doesn't seem to be particularly damaged by dogs. Still, there are issues that should require dogs to at least be leashed and preferably banned from the beach between Stairwell 21 and Panama Point, south of Sloat Blvd. One impact of dogs along the beach is to people who may not want to share the beach with dogs for health reasons, fear of dogs or any of a number of personal reasons. .From our point of view the primary impact of dogs on the beach is to birds. Of course many off leash dogs chase birds along the shoreline. But even leashed dogs and dogs actually under voice control that do not chase birds do in fact disturb them. The impacts are most noticeable during spring and fall migration when birds not habituated to people or dogs take flight at any disturbance. Dogs are quite clearly seen by birds to be predators, so instead of eating to fuel their migration, the birds spend time and energy avoiding the dogs. If there were only a few dogs, the problem would be negligible. But the impact of perhaps hundreds of dogs each day is pretty significant. Attached is a list of the shorebirds that used the beach between July 2010 and May 2011. The data was gathered as part of a Western Snowy Plover survey that included documenting disturbances to the plovers, and the numbers of dogs on the beach.

During the Western Snowy Plover survey period of mid July 2010 until mid May 2011, I (D. Murphy) gathered data on dogs on the beach. Serious incidents of disturbance to Western Snowy Plovers or to shorebirds were reported to the National Park Service. During that period I visited Ocean Beach 38 times for a total of 50.3 hours. During that time I counted 458 dogs. Only 131 (29%) were leashed. The remaining 327 (71%) were off leash. The average impact per hour was 9.1 dogs with 2.6 leashed and 6.5 off leash. It is unfortunate that the primary focus for wildlife disturbance is limited to Western Snowy Plovers. The impact from dogs falls for a great part on the other birds that utilize the beach. A complete list of those birds is attached. Considering the lack of compliance with leash regulations, it seems foolish to allow dogs on the most sensitive parts of Ocean Beach at any time. If some sort of compromise must be reached, it should be in terms of when disturbances to all shorebirds would be greatest. That can be determined from the sampling in the attachment. Essentially it would be during spring and fall migration. Another period of very heavy use of the beach by birds is during storms. particularly when they are accompanied by high tides. This is a period when the beach narrows and the birds are highly stressed from rising tides, wave action, wind and people and dogs vying for the same narrow stretch of sand open to the birds.

Again we wish to thank the National Park Service for the opportunity to comment on this plan. Our hope is that all of Golden Gate National Recreation Area will be managed according to the standards for resource

protection afforded to natural resources in other units of the National Park System. In cases where there is compromise and dogs are permitted, the resource that is being impacted should be of the lowest possible natural value and it should be the kind of area that can be restored at very limited cost or effort in the future.

Very truly yours, Joan M. Murphy Daniel P. Murphy

Correspondence ID: 4684 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean,

My name is Tszsan Kathy Mok-Reichardt. I live in the District 3 (North Beach/Chinatown) in San Francisco and am of Chinese descent. Since rescuing a shelter dog last year, I go to Fort Funston, Crissy Field and Ocean Beach at least 4 times a week, 2 hours for each visit.

I am writing to oppose the GGNRA's Draft Dog Management Plan because it lacks the scientific data to support its conclusion.

The Draft Plan fails to address the recreation component in the GGNRA enabling legislation which it must maintain and protect. The section focuses on park users who do not want to be around dogs, including minorities, seniors and children.

I myself as a member of the minorities who visit the GGN RA lands 4 days a week do not see the phenomenon described in the Draft Plan. In fact, for the 7 years I have lived in San Francisco, I have never even been to Fort Funston until I rescued my dog, the reason being that there are 99% of GGNRA lands I can go to that are not as windy, cloudy, foggy or cold, and not because I felt intimidated by the presence of off-leash dogs.

If the Park User Experience section of the Draft Plan must include racial data, it must first collect that data, give a thorough analysis before making the generalization that minorities such as Asians and Latinos are afraid of dogs. I find this section of the Draft Plan deficient of data concerning park use by race.

This leads to another error in the report'the Draft Plan is filled with general, undocumented assumptions of negative impacts caused by dogs. These assumptions include "dog traffic can physically move the soil," or "digging on beaches may disturb the soil," without completing the logic that the

presence of dogs leads to resource degradation.

The Plan does not take into account the relative environmental impacts caused by humans, horses, predatory wildlife, shore birds and nonnative invasive species, but instead, without any evidence or scientific proof, claims that dogs have significant impacts on GGNRA lands, thus the Draft Plan. For this reason, I ask that the GGNRA conduct the necessary research and present a relative comparison of impacts of the mentioned park uses before putting forth such a restrictive preferred alternative.

I also strongly oppose the Compliance Management Strategy in all of the alternatives in the Draft Plan. The document assumes noncompliance will automatically lead to resource degradation or negative impacts without factual statements or data that support that assumption. It is illogical to assume that compliance will lead to decrease in resource degradation, or vice versa. Instead of proposing such an extreme plan, GGNRA could analyze and implement its existing management strategy, such as sending out park rangers to the fields to provide education (e.g. hand out leaflets), dog owner training, better signage, temporary closure of certain areas and fencing off of sensitive areas to the endangered shore birds and wildlife. These will not only help to increase awareness of protecting our endangered species, but also serve as a means to curtail the potentiality of noncompliance.

It must also be noted that one-third of San Francisco households have dogs. There are more dogs than children in the city. As a rescue dog owner, my dog is a living proof that off-leash dog walking in an unfenced area has benefited and solved most of the issues for which she was given up to the shelter in the first place. Without these less than 1% of the GGNRA parklands available, my dog will suffer major setbacks in her rehabilitation of behavioral issues.

GGNRA consists of vast lands, and site-specific research and analysis must be performed to give the public information on which areas are being affected, how they are affected, and what the public can do to help. For instance, US Fish and Wildlife does not recognize Ocean Beach and Crissy Field as critical habitats for the snowy plovers. If a meaningful plan is to be implemented, critical habitats must be identified so that everyone can contribute to the cause of saving our endangered species within the GGNRA lands.

I am in support of a modified Alternative A (the "No Action" alternative) that also includes the new lands acquired in the San Mateo County or other lands to be acquired by the GGNRA in the future. The current plan should also be modified to provide clearer rules, more signage, improved vegetative

barriers, education and outreach as part of the overall program.

Thank you for your consideration. Sincerely, Tszsan Kathy Reichardt

copies sent to: Secretary Ken Salazar, Department of the Interior Christine Lehnertz, Regional Director, National Park Service, Pacific West Region Jon Jarvis, Director National Park Service Nancy Pelosi, Member, U.S. House of Representatives Diane Feinstein, U.S. Senator State Senator Leland Yee State Senator Mark Leno email copies sent to: Mayor Ed Lee District 7 Supervisor, Sean Elsbernd District 8 Supervisor, Scott Wiener District 3 Supervisor, David Chiu

Correspondence ID: 4685 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

The Marin Conservation League supports the need for GGNRA to provide a clear, enforceable policy to determine the manner and extent of dog use in appropriate areas of the park. The Plan and DENS have been closely reviewed by MCL's Parks and Open Space Committee and their recommendations have been affirmed by the MCL Board.

While we understand the need for consistent policy throughout the park, we have focused our comments on how the various alternatives might apply to seven sites identified in Marin County: Stinson Beach, Homestead Valley west of Mill Valley, Oakwood Valley/Alta Trail, Muir Beach, Rodeo Beach, Marin Headlands, and. Fort Baker.

1. In general, Alternative D, the environmentally preferred alternative, provides the greatest protection for natural resources and safety. At the same time, we recognize that all of the "action" alternatives (i.e., B, C, D, and E) increase restrictions on dog walking, walking over the existing condition. Therefore, we concur with the NPS' selection of the Preferred Alternative "C" for all but one of the seven sites in Marin. The exception is Muir Beach (see Comment 2, below). Alternative C would allow only two off-leash areas (ROLAs) in Marin County - one on Oakwood Valley Fire Road, and the other at Rodeo Beach on the northern portion of the beach.

Alternative C represents an appropriate compromise between protection of the environment and an attempt to accommodate dog walkers'at least as an experiment! The effectiveness of Alternative C in reducing user conflicts and enhancing safety of users and dogs will depend heavily on the combination of responsible observance by dog walkers and enforcement of

regulations by GGNRA. Because neither of these can be assured, adoption of this alternative should be conditioned on establishment of a "sunset" date no later than five years from adoption, for review of the Plan's effectiveness based on systematic monitoring of user compliance (See Comments 4 and 5).

2. We agree that Alternate D, the environmentally preferred as well as NPS preferred alternative for Muir Beach, is appropriate for that site, especially in view of recent habitat restoration at the mouth of Redwood Creek. Dogs would not be allowed on the beach at all. Applied to this environmentally sensitive area, this restriction should minimize the common temptation of dog walkers in an area where dogs are allowed on leash, to choose to ignore the limitation. The NPS can expect strong pressure from the Muir Beach dog community, however, to allow an unfenced ROLA on a portion of the beach, as is proposed in Alternative E.

3. The ROLA proposed for the Oakwood Valley Fire Road will be fenced along the sides, as well as gated at both ends. Hikers will share the fire road with off-leash dogs. We have several concerns about this proposal. First, it is not clear where the fencing would be located - adjacent to the fire road or at some distance? In either case, if fencing is effective to contain dogs it will also interfere with free passage of wildlife across the valley. Second, it is not clear how the proposed ROLA will affect other users - hikers, equestrians, and bikers. Oakwood Valley Fire Road is currently used by all three, and the almost parallel Trail is used by hikers and dog walkers only. It is closed to bikes and not usable by equestrians because of a narrow and unsafe bridge and steps at one end. If the proposed ROLA on Oakwood Valley Fire Road is closed to horses, equestrians will lose access to Oakwood Valley. While this road is not heavily used by horses, it is used by riders from Horse Hill. Also, if the ROLA is closed to bikes, this would force mountain bikers onto Oakwood Trail, making that trail unsafe for hikers. Resolution of these potential problems will require more study.

4. The proposed Compliance-Based Management Strategy will be based primarily on monitoring and recording the behavior of users by observation, but the Plan does not include a detailed monitoring plan. The Draft Plan establishes 75% as an acceptable level of compliance. However, the management response (i.e., changing ROLAs to on-leash areas, and on-leash to "no dogs") would not be implemented unless the compliance rate dropped below 75%. Given the size of GGNRA, the limited number of personnel, and this inexact measure of compliance, it will be difficult to develop an adequate monitoring plan. Implementing the monitoring plan in a way that produces reliable results and is legally defensible will be even more difficult. Particularly in ROLAs, the assessment of compliant "voice control" will require nuanced measures. The Plan and EIS must assure the public that compliance will be consistently monitored by establishing defensible, understandable, easily measured, and enforceable standards and

metrics.

5. Finally, the Compliance-Based Management Strategy proposed by GGNRA needs to be supplemented, from the beginning, by vigorous enforcement efforts that include (a) a visible increase in uniformed law enforcement presence; (b) increased issuance of citations, particularly to aggressive violators; and (c) tracking of repeat offenders. It seems clear that GGNRA plans to minimize issuance of citations "for safety reasons . . .it is assumed by staff that any contact with a dog owner regarding dog walking regulation compliance will be confrontational, and it is the park's goal to reduce the number of these conflicts." (Draft Plan/EIS page 286-287) Nonetheless, we agree with others that enforcement of regulations sends the clearest message to people about what is expected of them. Clear, unambiguous, and prominent signage is most important. Signs that are vandalized need to be replaced quickly and persons caught vandalizing signs should be prosecuted vigorously.

We appreciate the Park's efforts to inform and engage the public in this difficult task, and look forward to your responses.

Sincerely, Nona Dennis Vice President

Correspondence ID: 4686 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

On behalf of the Marin Humane Society I am. writing to include our comments on the GGNRA Dog Management Plan and Draft Environmental Impact Statement (DEIS). Thank you to you and your staff for allowing us the opportunity to not only comment on this document, but also to have participated on the Negotiated Rulemaking Committee. Having been a participant on that committee and in charge of dog enforcement activities in Marin County, this issue remains a priority that we are deeply concerned about.

I have worked with the Marin Humane Society (MHS) for over 27 years and have been involved in the enforcement of animal laws within our community for my entire career. We take great pride in the progressive laws and ordinances we helped pass at various levels as well as the proactive strategies we have utilized to deal with animal enforcement issues. Animal enforcement is our business so to speak. We remain one of the few areas in the country that have effectively enforced a County-wide control law, not a

leash law.

While issues involving animals can often be filled with emotions, both good and bad, some things remain the same; people love their animal companions and see them as family members. Dogs go literally everywhere with their human guardians; from animal friendly shopping malls to restaurants, dogs are a part of the community culture in Marin. This dynamic creates unique challenges related to our ability to educate and enforce the laws in many cases. I have learned through my experience here at MHS that good law compliance with animal issues requires us to look at strategies in very unique ways. As an organizational partner to your organization, I hope that we can offer comments on the DEIS that reflect our enforcement expertise, knowledge of our community, and trends that we deal with routinely on responsible pet guardianship and the benefits that dogs promote to a healthy lifestyle.

Chapter 1 ' Purpose and Need for Action: "Purpose for Taking Action"- We respect the need to preserve and protect all of the many valuable resources within the Park as well as providing a safe and varied park experience to users. We would emphasize that values shared by those that walk dogs are an important element that future generations will also regard as such. Since the 1979 pet policy was passed, it has been clear that dog guardians value public places, including trails, as opportunities to recreate with their dogs both off-leash and on-leash. While there appears to be more people that recreate with their dogs in Marin and beyond, our agency has seen a substantial decrease in the number of dog guardians in violation of our local laws since 1979. The draft plan should make note of changing values towards dogs and the important roles they play in human enjoyment.

"Need for Action"- While we believe that the GGNRA is tasked with protection of resources as defined by the NPS Organic Act, we also believe strongly that the dog management plan is unique to NPS regulation. We sometimes hear NPS staff make comments about the fact that "dogs aren't tolerated in other national parks, etc." The fact that the GGNRA has a pet policy is consistent with a larger recreation strategy that we believe makes this park that much more special than any other national park setting by allowing and welcoming dogs in a relatively small portion of the overall GGNRA lands. This "ahead of its time" planning strategy, now decades old, is consistent with the same kind of recreation offerings throughout the Bay Area that promote responsible multi-use access for a variety of users, including those with dogs. While the DEIS focuses on the negative aspects through the use of "conflicts, compromised visitor and employee safety, affecting visitor experience and resulting in resource degradation," we would argue that the need for such a document would share equally with the positive benefits that don't seem to be emphasized here. The draft plan

should also offer the positive user experiences, including those with dogs. -

"Purpose of GGNRA" ' The draft plan makes reference to "offer national park experiences to a large and diverse urban population while preserving and interpreting its outstanding natural, historic, scenic, and recreational values." We would like to emphasize that the GGNRA is in the hub of a large metropolitan urban area within the Bay Area. Many of its boundaries are literally the backyards of many of its more frequent users. Many of these neighbors are very vested in the fact that they can recreate within footsteps instead of miles to have an extraordinary national park experience. This factor emphasizes the special nature of the GGNRA in its relationship to neighboring communities, property boundaries and ease of use to the diverse populations it serves. The draft plan should address the importance of meeting the recreational needs of the users (including those that bring dogs) that are closest to its borders.

"Objectives:" "Visitor Experience and Safety" ' The draft plan should clearly define what a "conflict" relating to dog use refers to.

"Law Enforcement/Compliance with Dog rules, and Park Operations"- The draft plan objective should further define what "maximizing dog walking compliance" refers to. This goal does not appear to be measurable and doesn't provide a process to determine enforcement success. A possible solution would be to clarify what the parameters will be to encourage high compliance or to incorporate envisioned compliance rates as an objective. Improved Park operations and use of staff resources managing dog walking seem to be different parameters. The draft plan should be very clear about what the enforcement goals are and assume that enforcement and staff resources are a part of daily park operations.

"Park Operations"- The draft plan should clearly state what and how the monitoring will be done by the Park. We would like to see this area further defined by clear objectives. The reference to monitoring to be used in future decision making based on estimated outcomes seems harsh and one-sided. This objective should be clearer. The draft plan should also address how it will evaluate commercial dog-walking and what that enforcement policy proposal will be.

"Natural Resources"- The draft plan should further define the objective of "protecting native wildlife and their habitat from detrimental effects of dog use..." Further, referring to detrimental effects of dog use doesn't adequately address what those issues include.

"Cultural Resources"- The draft plan should further define the meaning of "detrimental effects of dog use."

"Education" ' The draft plan should further define how to "build community support for the plan to maximize management of dog walking use."

"Background of Dog Management at GGNIZA"- "Land Use Prior to Park Acquisition"- The draft plan makes reference to the GGNRA being established in 1972 and the practices of off-leash dogs continuing uninterrupted, although park staff recognized and documented issues arising from the practice during the early years of the Park's existence. The draft plan should provide more information and clarity on what these "issues" were as well as providing accurate information on the local community's culture with regard to off-leash access, especially in park boundaries close to neighborhoods. Muir Beach is an example of a community culture where off-leash activities were (and currently remain so) highly valued which resulted in deep political involvement with local animal services responders and county politicians.

"GGNRA Citizen's Advisory Commission and the 1979 Pet Policy"- The Pet Policy was passed by the commission in good faith to honor and work with community concerns about animal issues that were important in that era. Those same issues remain important for park users today. While the draft plan goes into great detail about how the Pet Policy did not abide by the federal regulations regarding dog walking in national parks, such is the nature of policy making. Many laws that are literally on the books are overshadowed by the enforcement strategies or other compelling issues related to those laws. An example of this would be the 2005 partnership agreement to develop protocols for addressing feral cats on Marin County GGNRA lands between MHS and GGNRA.

The draft plan leads a reasonable person to believe that this policy was in fact written by park staff in violation of law. It is noted that current court decisions, as they are referenced to in the draft plan, appear to uphold the ability of the Pet Policy to provide off-leash recreation as it was intended. The draft plan should provide (as an appendix) the case decision of U.S. vs. Barley (N.D. Cal. 2005) for full review by the public. The Pet Policy also makes it clear that existing routes to GGNRA hiking trails from Sausalito would be considered as those areas were made accessible in the future. The draft plan should include any review that was done in follow-up to this recommendation.

Increase in Use of the Park for Dog Walking and Other Recreational Uses"- The draft plan suggests that the number of conflicts between park users with and without dogs began to rise, as did the fear of dogs and dog bites or attacks. The draft plan should specifically give accurate data on what type of conflicts over specific time periods they involve. While fears of dog and dog bites or attacks are valid in many regards, laws and enforcement actions are based on fact, not perceptions. The draft plan should refrain from making

these biased comments and reflect information based on solid factual data.

"Current Management Issues and Impact Topics" - "Expectations and Views of Dog Walkers and Other Visitors" - The information on the data received in public comment analysis reports (NAU 2002a, 1; NAU 2002a, 5; NAU 2002a, 16-17; NAU 2002a, 17-20; NAU 2002a, 9-15; NAU 2002b, 1; and NAU 2002b, 11) appear to be critical documents to help gain better insight into the values people have for off-leash recreation. We recommend that the draft plan refer to these reports and make them available as appendixes. We would also be interested in the demographics of the responders and how many were Larimer County residents/park users. In addition, the benefits to dog walking should be further explored with additional study and data collection on the positive effects that dog walking (both on-leash and off-leash) provides to the physical and mental well-being of their guardians. The draft plan makes reference to over half of the respondents feeling discomfort or fear of off-leash dogs. We would recommend that the plan further address what these fears and discomfort levels were specific to. Our experience with human fears relating to animals is a topic that can be easily addressed through education. Park users will continue to experience fear and discomfort of dogs (and many other animal species) while visiting and this information can be vital to establish protocols to enhance the visitor's experience with animals they may encounter in the park.

"Impacts of Dogs on Natural and Cultural Resources in the Park" - The draft plan selected various topics of concern that only provide generalized impact concerns and most do not refer to data, reports or studies that have specifically addressed the impact dogs have created. This information in general appears biased and unreasonable. The draft plan should make every effort to rely on information that can be factually substantiated before making assumptions about any negative impacts dogs may have on park resources.

"Soils" - The issues reflected in the draft plan on this topic provide no factual basis from specific scientific studies completed. While on its face this may be assumed to be a negative impact, like horse manure on trails, the factual basis for this assumption is unreasonable. I would also like to add that while I was participating in the Negotiated Rulemaking Committee the impact of soils often came up. I repeatedly asked for data and specific scientific evidence of these statements and none was provided. We would request that the draft plan eliminate any comment on negative impact on soils until factual data can be collected that would verify these statements.

"Water Quality" - The draft plan is extraordinarily insufficient in fact on this topic. More importantly, we believe it is dramatically inaccurate and misleading. Our organization is highly knowledgeable about disease

transmission of dogs, especially rabies, parvo and distemper. There are no known studies to our knowledge that claim that these three diseases survive in water and we strongly believe that this statement is incorrect and should be removed. Additionally, we question the accuracy of changing water nutrient levels from dogs. We would recommend that the scientific data and reports used to make this statement be supported in the document. The plan refers to turbidity issues from dogs and this statement does raise concerns on potentially negative issues to certain waterways, but again we urge that these assumptions be substantiated by factual documentation and they should be site specific to each location. Many of the water and wetland areas of the Marin sites can dramatically change through the natural seasonal rainfall process which may also be a factor.

"Vegetation"- The draft plan refers to dogs off-leash without adequate voice control potentially trampling and denuding vegetation that would interfere with native plant species. We believe that this statement is an unsupported assumption and would recommend that the plan incorporate any studies or factual reports that would substantiate this claim.

"Wildlife"- The draft plan offers comments about the effects dogs have on wildlife. This topic area is one of shared concern as our organization often responds and investigates incidents of wildlife harassment by dogs. Of all of the topics under consideration, this is one of significant concern as there are many wild animals that reside in the GGNRA. The draft plan makes reference to "intensive use.- This term should be further defined. The draft plan also assumes that the presence of dogs will disrupt or degrade habitat. We would recommend that if there is valid proof of this finding that it be clearly stated and any studies or reports done are reported.

The draft plan refers to dog-related viruses that can be transmitted through dog feces to marine and terrestrial mammals. The disease examples listed in the draft plan are extremely rare and in fact the diseases spread are even more unlikely without direct physical contact from the infected species. Since the Marin GGNRA lands support a very healthy population of host wildlife species_ the same dangers could also apply to protecting visitor's dogs from disease issues and public safety issues around wildlife (as well as people). We are not aware of any wildlife disease issues in Marin County that have been spread to wildlife from dogs and we would debate this finding.

"Species of Special Concern"- We share the draft plan's concern with ensuring that these species can thrive. The draft plan fails to meet the proof that dogs have created problems for these species. Much of the draft plan language refers to the possibility that dogs "may" negatively impact special species and we would recommend that each site expand on the factual proof of exactly what the current conditions are. Having the facts of each site is

important to be able to appropriately comment on potential solutions. The draft plan makes reference to dogs trampling vegetation along trails that include plants that host endangered butterflies. The draft plan should address specific facts of how dogs have done this impact; we believe that humans, wildlife and other forces of nature may equally share in the impact. It would be important to be able to substantiate how dogs have done this to make management decisions on protecting these species.

"Park Operations"- The draft plan indicates that it requires "significant" staff, time and money to manage dog policy and enforcement activities as well as protecting species in the park. The draft plan should portray this factor in representation to its overall role of a park steward like other land management agencies. These issues come with that role no matter what users frequent the park. We would strongly recommend that the draft plan include the use of peer and volunteer groups to assist in the management and protection of certain areas in the park. This model has been used successfully in a variety of circumstances and it can become a very strong model for building effective community relations and citizen stewardship towards park lands.

"Land Use/Long-term Management of Resources or Land"- The draft plan should identify how to determine that overuse of lands caused by dogs is actually created by dogs and not other sources. The draft plan mentions how the GGNRA policy may impact policy at other levels, including local. We are especially concerned about this insight and would further emphasize that our local policies on dog management in Marin currently blend positively with the community culture and need for responsible off-leash recreational opportunities. To incorporate stricter regulations pertaining to dogs in GGNRA will have an impact on Marin County dog users and will put more pressure on our inconsistent enforcement efforts across our many boundaries. We believe this is a very important element in proper planning of long-term management processes with regards to dog issues and we would strongly recommend that the plan incorporate the impact on neighboring enforcement entities.

"Visitor Use and Experience"- The overall sense of the draft plan seems to portray dogs as a negative by virtue of their virtual presence in the park, the noises they allegedly create, the alleged safety threats they pose, etc. The draft plan seems to greatly lack the clarification that the places that dogs are currently allowed continue to represent an extremely small percentage of GGNRA land space. This is a very important point because it reflects the great value dog users have in accessing the park. The draft plan doesn't, provide factual data that people that do not want to be "exposed- to dogs have thousands of acres of options available to them in the GGNRA, unlike dog users who are extremely limited in their options.

"Employee, Visitor, and Dog Health and Safety"- The draft plan refers to increased conflicts and issues related to safety concerns from unruly and aggressive dogs upon visitors and park staff. The terminology of "aggressive" as it pertains to dogs can be very misleading and not consistent with clear definitions currently being used in animal law enforcement. The draft plan should further refine this definition to be consistent with current applications. We would recommend that the draft plan specifically identify the types of enforcement actions that were done at each specific site, especially those in Marin for which the enforcement actions appear minimal. Having this information relative to these sites will be an effective tool in determining effective enforcement strategies and appropriate allocation of park enforcement and education resources.

The draft plan continues to make references about disease transmission from dogs to wildlife and from wildlife to dogs. These assessments seem to be misinterpreted and suggest that this issue is a common occurrence when the reality may be rare. We are not aware of any reported disease issues from wildlife to dogs in Marin County GGNRA lands or likewise from dogs to wildlife.

Chapter 2 - Alternatives Overall General Comments:

The specific GGNRA sites being examined in Marin County represent a large area of high use by dog guardians. These areas are highly valued among many Marin County residents and have a long history of responsible dog use, both on-leash and under voice control. The Marin sites represent an overall limited amount of space accessible to dogs, considering the total amount of GGNRA lands. Further regulating these areas will have an impact on surrounding enforcement agencies in their jurisdictions. Marin County animal enforcement ordinances are governed by a Joint Powers Agreement with the cities and county. A large consideration of our contractual agreement with the County of Marin is to help ensure uniform animal ordinances, consistent with public needs and balanced public safety. We feel very strongly that providing a safe place to walk, hike and recreate with dogs in Marin both on leash and under voice control is a very important element in the values of our community.

The draft plan refers to a "compliance-based management strategy." We believe that this type of strategy doesn't encourage animal guardians to comply with laws, but in fact penalizes all park users when violations occur. We would highly recommend that the plan focus efforts towards gaining compliance through strategies that are based on penalizing those in noncompliance instead of all users. Our experience with enforcement over many years indicates that dog guardians are more likely to stay in compliance through education, partnerships, peer-supported enforcement and citing those found in violation. Penalties for non-compliance through

court bail schedules can be raised through judicial process and repeat offenders can be fined at substantially higher rates. "

Clear messaging and signage is also a very important component to ensure compliance to dog rules. Many of the areas of Marin GGNRA sites are popular hiking areas that traverse upon many neighboring jurisdiction lands. It would be very helpful to have the plan address how these areas will be properly marked and identified to inform both dog guardians, as well as non-dog users, on the proper rules of the land. This issue has been very confusing in many of the Marin sites.

Commercial dog walking in unincorporated Marin County lands is currently not regulated with the exception of lands under the jurisdiction of Marin County Parks and Open Space. Some of the specific sites in Marin County GGNRA lands are very popular with commercial dog walkers. These areas border unincorporated Marin areas that we enforce. Some of these borders are also in conflict with the rules of Marin County Parks and Open Space as they apply to commercial dog walking. We are concerned about the impacts that commercial dog walking would have on our enforcement activities if these uses are further restricted in other areas of the GGNRA.

Specific Site Comments: Stinson Beach- We recommend that the current status of this site be maintained and we support Alternative A.

We currently have a strong relationship in assisting GGNRA staff with dog and wildlife issues at this site. There are many dog advocates in the neighboring community that are very involved in providing their dogs with voice control on the beach adjoining (Marin County jurisdiction) this site

Homestead Valley- We recommend that the current status of this site be maintained and we support Alternative A.

There are adjoining neighborhoods in the surrounding borders that enjoy recreating with their dogs under voice control in this area. Most of the trails in this area are filled with dense vegetation, forcing most dogs and their guardians to stay on the trails, as we would continue to urge them to do.

Alta Trail/Orcha?d Fire Road/Pacheco Fire Road- We recommend that the current status of this site be maintained and we support Alternative A.

This site is a favorite among many of the GGNRA sites for those seeking voice- control with the dog companions. This area is very popular as a hiking destination and is often utilized in conjunction with the Oakwood Valley Fire Rd. as a looping trail. There are areas of this trail that are very steep with lush thick vegetation. These conditions do not make it favorable for dogs (and their guardians) to go off of the designated trails. As long as

trail users are encouraged and instructed to stay on the trails we don't see the potential for negative impacts.

Oakwood Valley- We recommend that the current status of this site be maintained and we support Alternative A.

This site is a popular area for local neighbors on the Mill Valley side as well as the Marin City to recreate with their dogs under voice control. It is commonly used as a loop trail that joins the Alta Trail. We believe that park users at this site respect the dog control laws as well as keeping their dogs on the designated trails.

Muir beach- We recommend that the current status of this site be maintained and we support Alternative A. It could also be helpful to keep dogs on leash from the parking lot, over the bridge, near the creek and then under voice control at the beach.

This area has a long history of responsible off-leash dog use. It has been, and continues to be, a very popular area with local residents. Historically and politically, this is an area that the community has played a vital role in accepting a stewardship for the special lands and gifts nature has to offer here. While the draft plan goes into extensive detail about the negative impacts dogs "may" have on this site we believe the evidence of proper coexistence has been demonstrated with the ability of this site to host special species, while providing responsible voice control dog recreation.

Rodeo Beach/South Rodeo Beach- We recommend that the current status of this site be maintained and we support Alternative A.

This site is heavily used by many dog guardians throughout the Bay Area and it offers a unique experience to its users. Further limiting this area to dogs would have a dramatically negative effect on the community.

Marin Headlands Trail- We recommend that the current status of this site be maintained and we support Alternative A. We would like to see on-leash access considered on the Tennessee Valley Trail.

Fort Baker- We recommend that the current status of this site be maintained and we support Alternative A. We would like to see segments of voice control on the northern section of East Rd. as well as a segment of the Drown Fire Rd.

Many residents of Sausalito can easily access this area on connecting trails. There is a need to be consistent with neighboring regulations in this area.

Concluding Remarks: Our organization realizes the importance and great

magnitude this dog management plan brings to you and your staff. Finding a balance between a multitude of users, special species, safety and resource protection is a very important process. Equally important, we believe, is the ability to create community relations and partnerships that emphasize the importance of the human-animal bond. This bond, for many, is a life altering experience that leads them to the beautiful spaces of our national parks. the backyards to many Marin County residents. We believe that our community is very well educated in the realm of proper coexistence between responsible dog use in the natural world. Over 80% of our lands in Marin County reflect that value.

An adaptive management plan to the needs of our communities prides itself on the ability to succeed rather than long term failure and penalty. We have found that working through the challenges our communities face, and by partnering with local community groups. our enforcement and educational messages win. We consider our organization an allied partner to the GGNRA, as our long history in working closely has demonstrated. Working to build relations in individual communities is something we value because it helps us remain efficient while building public trust. It has shown to be effective over time in solving animal issues here.

Thank you for the opportunity to provide comment in a variety of ways. We will continue to look forward to being a resource in the area of pet guardianship as well as localized animal enforcement issues. Please feel free to contact me at (415)506-6209 to discuss any issue in more detail or if I can be of further assistance to you. Sincerely,

Captain Cindy Machado Director of Animal Services

Correspondence ID: 4687 **Project:** 11759 **Document:** 38106
Received: Jun,02,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Frank Dean:

Mann County (the county) applauds the exhaustive effort that Golden Gate National Recreation Area (GGNRA) has undertaken to achieve sometimes conflicting objectives of the GGNRA Draft Dog Management Plan/Environment Management Plan (draft EIS). They are 0 preserve and protect natural and cultural resources and natural- processes; ? provide a variety of visitor experiences; ? improve visitor and employee safety; ? reduce user conflicts; and ? maintain park resources and values for future generations.

Reconciling and finding balance among these objectives about which so

many care so passionately is a herculean task. GGNRA has spent more than six years in a comprehensive public process attempting to learn and to educate on the matters of recreation for dogs and people in a wondrous and fragile natural and cultural setting. While full consensus was not reached on how to achieve the objectives, much was learned by the park and the participants, including those in Marin County.

The Marin Humane Society estimates that there may be as many as 100,000 dogs in this county of 250,000 people. Marin dogs are much loved family members and work-out partners. For this reason, county managers strive to find safe ways to accommodate pets in parks. GGNRA is not the only venue for dog lovers to recreate with their best friends. Marin Municipal Water District and Marin County Parks and Open Space (county parks) properties, about 20,000 acres each, are also well used by Marin dog owners. Both entities share GGNRA's objectives to balance dog use and enjoyment with resource protection and conflicts with other users. Achieving compliance with rules in parks is unusually and surprisingly difficult in Marin. County park rangers report that compliance with dog policies is one of the most time consuming and confounding challenges that they face.

The county has heard from many interested constituents during the GGNRA draft EIS comment period. Comments range from frustration that leashes will not be required on all GGNRA lands, to extreme disappointment that areas now informally off leash will soon be off limits. The county also has heard many comments of support for the preferred alternative, largely because of the process undertaken to choose it. County elected officials and managers have met with the GGNRA superintendent and his staff on several occasions. Points of potential refinement have been discussed and we are confident that some adjustments will be made. Ideas for refinements will be presented in concept in these comments. Both entities have pledged to continue to look for ways to respond to draft EIS public comments over the next year.

Comments presented here strive to acknowledge that while the county and GGNRA share many issues and serve the Marin constituents, GGNRA has different mandates, serves additional regional and national constituents, and has sole jurisdiction over the federal lands that are the subject of the draft EIS. We thank you for this opportunity to comment. The county looks forward to future discussions as the final EIS is crafted.

General Comments Marin County comments are about Marin areas only. However, the county is concerned that restrictions proposed throughout all GGNRA lands will create pressure on county parks by dogs displaced from new GGNRA rules. This was not thoroughly analyzed in the EIS. In conversations between GGNRA and county staff, GGNRA staffers correctly asserted that such an analysis would be very difficult to achieve. How many

dogs currently using Muir Beach will now go to county parks instead? It would be difficult to design a model for a meaningful answer. Nevertheless, none disputes that displacement will occur.

As stated above, the county also understands that compliance with rules about dog use is very difficult to achieve in Marin County. We wonder if compliance concerns drove GGNRA to select a "no dogs" stance in several places where they might have selected "dogs on leash" if it seemed feasible to achieve compliance. Several ideas presented below raise this issue. Other comments suggest ways to mitigate displacement so that GGNRA can, with their land management partners, continue to offer Marin citizens a sufficient number of trail-miles to recreate with their dogs.

An additional recreation outlet for dogs the county is considering is an alternative to dogs on trails. Marin County is learning from thousands of other very successful parks systems across the country that dog parks, if carefully located and designed, and if sufficiently sized, can be much used and much loved assets to communities. They offer a very different experience for both dogs and their owners. While not suggested instead of trails, the county is considering them in addition to trails. GGNRA management has agreed to work with the county to explore the potential for a new dog park site in southern Marin. Area Specific Comments Muir Beach Muir Beach has been the subject of many of the comments the county has heard. People familiar with the costly restoration of Redwood Creek's significant creek and wetlands habitats support the proposal to restrict dog use of the beach. Habitat restoration has been crucial to support coho salmon, red legged frogs and other threatened and endangered species. Restoration of the lagoon and creek were made possible with public money through grants from the federal and state governments.

Many dog owners who use this area love it and have voiced strong objections to the restrictions.

Dogs off leash have long been a natural resource protection issue at Muir Beach. Dogs originate from visitors and from the neighboring community. The county understands importance of the natural resources at Redwood Creek, the lagoon, and the beach, and has no position on the preferred alternative that restricts dog use to parking lots, and on leash. However we believe that dogs currently using this area will move to county parks once new rules are in place.

Stinson Beach The preferred alternative does not constitute a change in existing conditions. It proposes that dogs be restricted to parking lots and be on leash. County owned and managed Upton Beach, adjacent to and north of Stinson Beach, is a designated "dogs allowed" beach. This traditionally has taken pressure off of Stinson Beach. In fact, GGNRA rangers direct dog

owners to Upton when enforcing the federal rule. Upton Beach dog users are adjacent residents, and those who were Stinson Beach bound but were prohibited by dog restrictions. These redirected users park their cars in the GGNRA lot, cross an unsanctioned federal area with their dogs to the county beach.

Managing Upton Beach is a challenge for the county. The county has two ideas to improve management, health and safety, and visitor enjoyment of this area. The county requests that a limited segment (to be determined) on the northernmost edge of Stinson where it abuts Upton be designated for dogs. This would create a sanctioned area on the federal beach near the parking lot, and relieve pressure on the relatively limited area available at Upton. It would acknowledge and accommodate those dogs that GGNRA rangers redirect to the county beach. This also would help mitigate displacement from Muir Beach.

Dog waste on Upton Beach has become a serious health issue. The county does not have adequate staff to patrol, nor does it have the staff to manage dog waste removal. The county and the Stinson Beach community are partnering to solve the problem. The county has installed six dog waste bag dispensers and signs at beach entry points. The local private waste management company has provided six receptacles at those spots and has pledged to empty the receptacles on the regular community pickup. The county requests assistance from GGNRA in restocking the six dispensers weekly. Rodeo Beach The county supports the preferred alternative for Rodeo Beach. It allows dogs off leash on most beach areas, and requires leashes while crossing through the sensitive lagoon area. This area will receive displaced use from Muir Beach. Restricting access on the southernmost portion of beach may be difficult to enforce, and the area may not environmentally distinct. However it will provide a dog free zone for beach users who want an experience free from dogs.

Homestead Valley Homestead Valley is a popular dog walking area. The county has received comments supporting off leash use in the valley. Others who are residents of the valley fear that they will become a destination for dogs displaced from other newly restricted areas. The county requests that both entities' staff examine an additional way to segment the valley to accommodate some off leash use without inviting new out-of-community access through the community.

Oakwood Valley There is much confusion about what the public supports in Oakwood Valley, especially in regard to the ROLA area, i.e., the enclosure. The county urges reexamination of this alternative and the concept of this enclosed area. We urge that some off leash trail use be allowed to continue in the area.

Alta Trail The Alta Trail is well used and much relied upon for residents of Marin City and Sausalito. Its proximity to these communities makes it an important destination for daily exercise for people and pets. Historical use from these populous and topographically constrained areas has had an adverse impact on the natural resources. However, these attributes make this trail a candidate for continued off leash use. Comments to the county about the proposed change to leash- required have been pointed and frequent. The county requests that this trail remain designated off leash to serve these communities.

Marin Headlands New restrictions in the Marin Headlands surely will result in significant impacts of displacement to county parks. The Headlands trails that are currently open to off leash use (as shown in alternative A) constitute the quintessential Marin County trails experience. These trails are beloved by all, including those who recreate with their dogs. The county acknowledges that current impacts to resources warrant management changes. If the same trails depicted as off leash in alternative A were made leash-required, these impacts could be minor. The draft EIS analysis of impacts to the Marin Headlands trails does not conclusively indicate closure of these trails to dogs. It does support requiring leashes. The county wonders if the feasibility of achieving compliance with a leash rule dictated the decision to choose closure of the loop of the Coastal Trail to Wolf Trail to Miwok Trail. We urge GGNRA to give further consideration to adding this loop and the Julian Road (Coastal Trail) extension east to the leash-required inventory. Perhaps additional outreach and rigor of enforcement could help to underscore the importance of reducing resource impacts in this iconic area. Ft. Baker The county supports the preferred alternative for Ft. Baker.

Congratulations on achieving this milestone. We know that GGNRA has several difficult tasks ahead, including addressing the public and agency comments. Thank you for the opportunity to comment. We look forward to continuing discussions about refinements and ways to address public comments while meeting GGNRA's objectives and mandates.

Sincerely,

Linda Dahl Director and General Manager

Correspondence ID: 4688 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean:

I am writing to provide comments on the Draft Dog Management

Plan/DEIS. The members of the GGNRA Liaison Committee of the City of Pacifica discussed this document with GGNRA representatives as well as those citizens who have provided comments to the Committee to understand the context and content of the DEIS with special emphasis on affected lands in Pacifica.

At their regular meeting of May 23, 2011, the City Council held a public hearing, reviewed and deliberated on the comments relating to the Draft Environmental Impact Statement for Dog Management in GGNRA lands within the limits of the City of Pacifica, and voted unanimously to submit the following comments:

Multimedia Approach to Public Education in Pacifica: Despite the considerable publicity surrounding the DEIS and potential dog management rule changes coming, there will always be a subset of the public that will be caught unaware when these changes are implemented. We request the GGNRA employ their skills at outreach and education by adopting a multimedia approach and avail themselves of the many informational options available in Pacifica for outreach (e.g. newspaper, television, web sites, clubs/organizations, meetings etc.).

Rule Compliance and Enforcement Should Include a Tiered Approach: It is our understanding there will be a compliance component including the option to increase overall restrictions at a given site if compliance drops below a defined threshold (e.g. dogs in an on-leash area may become a no dogs allowed area). We also expect that eventually, in the extreme, the possibility will exist of issuing citations to individuals in violation of the regulations. We would hope that such compliance and eventual enforcement actions will include a tiered approach with a sufficient period of informal warnings to ensure all park users are aware of the management changes. We encourage the GGNRA to work with local dog organizations (e.g. POOCH) with regard to prior outreach and education, as well as monitoring efforts, to evaluate compliance once the regulations are implemented.

Clear Signage at Enforcement Transition Zones: There are a number of locations where there is a transition between GGNRA and City- managed lands. Without clear and prominent signage a person walking a dog may suddenly find they are no longer on City property but GGNRA land and in violation of the new regulations. An example of such a transition zone is at the south end of the berm (owned by the City of San Francisco but managed and used by Pacificans) which transitions seamlessly into GGNRA Mori Point land. Therefore we encourage GGNRA to clearly post these transition zones.

Site-Specific Comments The following are comments specific to the "alternatives" presented by the DEIS plan for lands in Pacifica. Map

references refer to maps of the various "alternatives" for each location. In most cases we select a particular map "alternative" modified by the inclusion of certain trails. Our overall rationale for suggesting these changes include: 1) the need for more recreational access on GGNRA lands for on-leash dog walkers in Pacifica including loop trails and access to and from neighborhoods or open space areas exhibiting high visitor volume; 2) the belief that these changes are compatible with maintaining ecosystem integrity; 3) our Committee members' observations that under controlled conditions, on-leash dog access to open space has not always, over the past decades, degraded habitat integrity; and 4) concerns that the site use restrictions proposed in the DEIS will cause negative effects from the pressures for other outdoor dog-related recreation.

Sweeney Ridge: Map 19E should include on-leash access for the Baquiano and Sneath Lane/NPS Easement Trails. We suggest that the thick chaparral on the Baquiano side and the fact that the Sneath Lane/NPS trail is paved would prevent most if not all dogs from accessing the property off the trails (in the event there is non-compliance with the leash law). Proper enforcement of the rules should ensure that few if any violations occur, in which case the environmental effects from site access on this parcel would be minimal.

Milagra Ridge: No Comment.

Mori Point: We suggest that the trails designated on Map 17C as "Tmigtac" and "Polywog" trails be modified to allow on-leash dog access. We believe the likelihood of either the red-legged frog or the San Francisco garter snake being harmed or negatively affected is extremely remote. Furthermore, the "Polywog" trail is an example of where it is important to maintain neighborhood access from Old Mori Point road to Fairway Drive. This trail runs parallel to a long fence line and is clearly not a species migratory corridor.

Pedro Point: Map 20C was lacking detailed trail maps making it difficult to evaluate these options. The GGNRA has access to the publically vetted trails map that was created through a cooperative effort of the Pacifica Land Trust and the National Park Service. We suggest incorporating the trails map from that effort as a starting place for discussion of possible on-leash dog access on Pedro Point. It seems reasonable to assume that as soon as the Devils Slide tunnel is open and the segment of Highway 1 between the two portals is abandoned and turned over to public foot and bicycle access, Pedro Point will become a popular destination. If that is a valid assumption, the public will seek access to the site with their dogs. We suggest adding the proposed trail network from the Pacifica Land Trust grant effort to more definitively establish what forms of dog access might be possible in advance of the actual transfer to the GGNRA (which has been pending for many

years). It seems reasonable to consider on-leash access from the old parking area up the south ridge, north to the middle ridge, and then back to the east via the ridge or the valley trail between those two ridges.

Future Considerations The City Council established the GGNRA Liaison Committee with one of its goals being to promote the economic interests of the City with respect to open space by promoting hiking, bicycle riding, bird watching, and other recreational uses compatible with maintaining park resources. We are concerned that a loss of on-leash dog access on lands within Pacifica might have unwanted economic consequences, as dog walkers will go elsewhere, effectively eliminating the possibility of patronizing Pacifica's restaurants, hotels, or other retail outlets. While this cannot be readily quantified, we wish to express our concerns about this possibility, as it has been the City's long-held desire to see just the opposite occur. Our partnership with the GGNRA has been premised on the mutual benefits that Pacifica and the National Park Service can have from expanded open space. These are benefits that extend to both the human and natural environments. We have expected to see increased visitation, possibly the expansion of a visitor center, and habitat improvements (such as have occurred much to your credit at Mori Point) lead to enhanced economic circumstances in Pacifica. While this remains possible, we encourage you to consider these effects while making final evaluations of the proposed actions in the DEIS.

Last, there is the issue of exploring sites within or adjacent to the City of Pacifica. Many citizens have asked if there could be some place in this vast park, and specifically in or near Pacifica, where the GGNRA can establish an off leash area (e.g. land at Sheldance entrance adjacent to Highway 1). We would like to extend the resources of our City staff and the Liaison Committee to assisting the GGNRA in identifying such a location and how it could be managed in a manner consistent with the other off-leash areas under consideration in the DEIS.

We thank you and your staff for your dedication and hard work. We continue to be grateful for all that you have done and continue to do for the advancement of park lands in and near Pacifica.

Sincerely Mary Ann Nihart Mayor cc: Council Members Pete DeJarnatt, Sue Digre, Jim Vreeland, and Len Stone Paul Jones, Co-Chair, GGNRA Liaison Committee

Correspondence ID: 4689 **Project:** 11759 **Document:** 38106
Received: Jun,06,2011 00:00:00
Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

I write to oppose the GGNRA's draft dog management plan. I hope my story will help you understand the special nature of the GGNRA as an urban recreation area, and why it is important to continue to permit residents to enjoy the GGNRA with our dogs.

I live with my family (two children and a husband and a dog) in San Francisco, and have been a resident here for 32 years. I have been a member of the Golden Gate National Parks Conservancy for at least 20 years. My family has owned a lovely dog, Jake, for the past seven years. This dog is my children's best friend.

Two years ago I was diagnosed with cancer. I spent 9 months in treatment ' three surgeries, three months of chemotherapy, one month of daily radiation treatments. My dog was my constant companion during these very difficult months, keeping me company and comforting me during week after week of debilitating treatments. As often as I could ' often straight from the hospital ' I would go to the beach to walk with my dog. When I was especially ill and unsteady, we'd go to Crissy Field or Ocean Beach, where access to the beach was fairly easy. On stronger days, when I could negotiate the sand ladder, we'd go to my favorite beach at Fort Funston or scramble down the rock pile south of Sloat to walk south towards Pacifica along Phil Burton Beach. When I was finally released by my doctor to run for exercise, my first run was along Ocean Beach with my dog. We were so exhilarated, we ran straight into the ocean at the end of my run and I had my first post-cancer ocean swim ' even though it was February!

There were rarely more than a few people at the beach when Jake the dog and I visited. South of Sloat, on Phil Burton Beach, there were almost no other people on the beach. I never felt that my dog and I were in conflict with other beach users or other beach species. Often I picked up trash along the beach ' I always thought Jake and I had a positive impact, that we were giving back to the beach that was nurturing me into recovery from cancer.

If Jake can't go to the beach anymore, I will need to find other places to walk and run with him, so I won't be able to go to the beach either. We will both miss it terribly.

I tell you this story because, only in an urban recreation area, could a cancer patient go straight from a major medical center to the beach. The beaches in San Francisco are not pristine wilderness ' they are full of old battlements and rock piles to prevent erosion by the waves. My dog is not degrading this environment ' he is enjoying it and helping me, an urban resident ' enjoy it too. Please do not take this away from us.

Thank you for considering my views. Sincerely, Polly V. Marshall

Correspondence ID: 4690 **Project:** 11759 **Document:** 38106

Received: Jun,03,2011 00:00:00

Correspondence Type: Letter

Correspondence: Dear Superintendent Dean:

I am writing to express concerns that I have with the draft rules for dog management at the Golden Gate National Recreation Area (GGNRA) in San Francisco and San Mateo Counties. As you know, when Congress created the GGNRA nearly forty years ago, it intended to not only preserve and support the unique park space but also maintain the historic recreational and educational opportunities that residents of the San Francisco Bay Area had traditionally enjoyed. This park is unique from others in our nation as it is truly an urban space. As you move forward with the proposed rule, I urge you to not only address the concerns that my constituents have raised, but make every effort to protect both the environmental characteristics that are unique to this park and the historic recreational uses that the residents in this region rely on.

As you know, two of the communities in my district, Montara and Moss Beach, border Rancho Corral de Tierra, a wonderful property that spans more than 4,000 acres which many of my constituents visit on a daily basis. For decades, residents of the region have been stewards of the land and truly consider it to be part of their own backyards. The area is regarded as dog friendly, largely because of the numerous trails available for dog walking. I understand that because ownership of the land is only now in the process of being transferred to the GGNRA, the draft dog management rules do not address the region. Therefore, the space will be classified as "new lands" when the proposed rules takes effect and dogs would be prohibited, absent a compendium from you determining otherwise. I urge you to consider all options available for this land after the transfer is complete and reject the default dog prohibition. Further, just as the public has had an opportunity to comment on all property affected by the dog management plan, so too should the residents who frequent this property. Thus far they have been denied the option to contribute to the public process because the land has not been under GGNRA ownership. They must be afforded the chance to actively participate in the process and a solution must be crafted which both protects the unique environmental aspects of the park while preserving recreational usage.

I am also concerned about the severity of the Ocean Beach preferred alternative, As you know, the proposed policy would only permit dogs off leash in the one mile area north of stairwell 21. Dogs will be completely

restricted from the entire beach which is south of this marker ' a 2-mile stretch that many of my constituents regularly visit with their dogs. I appreciate the rationale that the Snowy Plover frequent this area and have been disrupted by the dogs, but ask that you consider all less restrictive means that would still protect this endangered species. Might you designate an area within this zone where birds are not as prevalent which can be set aside for off leash use? Please evaluate this and any other plausible alternatives that would both accommodate the dog walkers who utilize this stretch of beach while protecting the Snowy Plover.

Lastly, many of my constituents regularly visit the Fort Funston beach area with their dogs and are concerned with the preferred alternative restrictions. While I join them in commending the fact that the proposal would maintain the beach area as off leash, I ask that you reexamine the plateau area restrictions. Specifically, commercial dog walkers and non-commercial dog walkers alike have shared with me that they would like the open field area just north of the drinking fountains to remain off leash, rather than prohibited to dogs altogether, as the plan proposes. As you know, dogs would benefit most from the span if they are able to run around off leash and this space has been historically used for that purpose. In addition, many of my constituents are concerned that the preferred alternative would require dogs to be on leash on both beach access trails, and that this could impose a safety risk due to the steep decline. I urge you to reevaluate this proposal so that it is more logistically sound.

The issues that I have raised are certainly not exhaustive of those presented by my constituents but are rather those of greatest concern. I am pleased that you have promised to review and adequately respond to the comments you have received from the public during this period and I expect that my constituents will have their voices heard through that process. Furthermore, I view this as only the first step in what is a very important democratic exercise. To that end, I look forward to reviewing the draft rule later this year, including any revisions extracted from the submitted comments.

As you know, the lands that make up the GGNRA are invaluable to the people of our region. I commend you for taking steps to protect the endangered wildlife and the precious environment. I also thank you for your fair and full consideration of the issues my constituents have raised. All the best, Jackie Speier Member of Congress

Correspondence ID: 4691 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) for the above project. Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The National Park Service (NPS) has developed a Dog Management Plan that is intended to provide clear, enforceable policy regarding the manner and extent of dog use on Golden Gate National Recreation Area (GGNRA) lands. The proposed Plan and Draft EIS describe six alternatives for each of twenty-two locations for the management of dog activities in San Francisco, Marin, and San Mateo Counties, and detail the resources that would be affected at those locations. NPS has identified, for each site, a preferred alternative that is expected to minimize environmental impacts to endangered species such as the snowy plover and mission blue butterfly, decrease disturbance of soils and vegetation, and protect water quality of lagoons, creeks, and wetland habitats.

EPA recognizes and appreciates the need to manage recreational use of GGNRA lands in order to protect sensitive resources, and the difficulty of balancing the often competing goals of conservation and public access. We support the imposition of reasonable restrictions on dogs where necessary and appropriate. From the perspective of protecting resources within the GGNRA, the proposed action has many clear benefits; however, we are concerned that the Draft EIS does not fully address the potential impacts on resources outside of the GGNRA, as well as some impacts, within GGNRA boundaries.

Based on our review, EPA has rated the document Environmental Concerns-Insufficient Information (see enclosed "Summary of EPA Rating Definitions"), We believe that the Draft EIS presents an insufficient analysis of the proposed Plan's indirect impacts on city, county, and State parks, as well as GGNRA lands. Additional analysis should be conducted to identify the locations outside of the subject GGNRA lands that are most likely to receive greater use by current GGNRA users seeking alternate recreational areas for their dogs, and to evaluate the likely impacts of increased use of such alternate areas by such individuals and their dogs. EPA recommends that, in the Final EIS, NPS 1) identify locations of parks that are likely to receive increased visitation, 2) identify the resources at these locations, and 3) discuss more thoroughly the potential induced impacts on these resources.

For most of the GGNRA locations, the Draft EIS identifies at least one city, county or State park that may receive increased visitation as a result of implementing the preferred alternative. These parks appear to have been

selected based primarily on geographic proximity to the GGNRA location. Proximity may not always be the determining factor for where a person will choose to walk his/her dog. In the Final EIS, NPS should include the reasoning used in identifying locations that may experience induced visitation, considering factors such as types of recreation available (trails, roads, off-leash, on-leash), types of habitat and terrain (beach, forest, scrubland, hilly, flat), the availability of water for drinking or water play, the availability of nearby parking, the presence or absence of poison oak, etc., in addition to proximity. Surveys of current GGNRA users with dogs may be useful in identifying the alternate areas most likely to be visited. The Final EIS should identify the parks most likely to receive increased visitation, particularly near high-use GGNRA locations where there would be restrictions or concentrated dog recreation, including Muir Beach, Crissy Field, Baker Beach, Ocean Beach, and Fort Funston.

The Draft EIS does not identify the types of resources that are likely to be adversely affected as a result of indirect impacts. For many of the GGNRA locations, the document states that the types of resources present at the potential alternate parks are unknown. Some of the alternate parks contain water bodies, vegetation, anti/or wildlife that could be affected by increased dog use. Other resources or values that may be affected include visitor experience or human health and safety. EPA encourages NPS to identify more thoroughly those resources on which indirect impacts will occur.

Finally, the Draft EIS does not sufficiently identify and analyze impacts on the resources at locations likely to receive increased visitation. For some GGNRA locations, such as Mori Point for example, the Draft EIS states that water quality (p. 529), vegetation (p. 671), and wildlife (p. 963) at adjacent sites could receive indirect impacts as a result of implementing the preferred alternative, but that any impacts to those resources are expected to be negligible. No information or documentation is provided to support this conclusion for Mori Point, nor for many of the other locations that would experience changes in dog use as a result of implementation of the preferred alternative. The Final EIS should describe the likely impacts on areas expected to receive increased use and explain how they were determined.

Although, on the whole, EPA expects that the proposed action would be beneficial to GGNRA lands and resources, potential adverse impacts are not limited to other parks, but also include some GGNRA lands. For example, the document states that the preferred alternative for Muir Beach "provides 'a no-dog experience on the beach and those visitors looking for a southern Marin beach for dog walking could go to Rodeo Beach" (p. 104). Therefore, it is reasonably foreseeable that Rodeo Beach will experience indirect impacts as a result of restrictions at Muir Beach. The DEIS does not analyze the impacts to Rodeo Beach that would be expected from eliminating dog recreation on Muir Beach, which is a "high on weekends" visitor use area (p.

271), This is particularly notable given that Rodeo lagoon has occurrences of federally-endangered tidewater goby. The DEIS identifies numerous city, municipal, and State parks in the Bay Area that provide opportunities for recreation with dogs; however, many of them are located at substantial distances from GGNRA locations where restrictions would occur. It may not be necessary to fully analyze potential indirect impacts at all of the identified parks. Some city and local parks do not have sensitive resources such as wetlands, coastal dunes, or endangered species, and some city and local parks would not expect increased visitation as a result of the proposed action. Some GGNRA lands are identified as low-use areas and may have negligible displaced impacts. However, a fuller analysis of reasonably foreseeable impacts where they would be most likely to occur should be provided in the Final EIS. Some potential indirect impacts that should be more thoroughly investigated include impacts to water quality, vegetation, wildlife, and park maintenance needs; changes in vehicle miles traveled to access recreational sites; dog waste management; visitor use experience; and increased or concentrated erosion.

EPA encourages NPS to continue to work with cities in Marin, San Francisco, and San Mateo to resolve conflicts, address community concerns, and increase public understanding of the need and basis for the proposed action.

We appreciate the opportunity to review this DEIS. Should you have any questions regarding our comments, please contact me at (415) 972-3521, or contact Stephanie Skophammer, the lead reviewer for the project. Stephanie can be reached at (415) 972-3098 or skophammer.stephanie@epa.gov. Kathleen Martyn Goforth, Manager----' Environmental Review Office Communities and Ecosystems Division Enclosures: Summary of EPA Rating Definitions

Correspondence ID: 4692 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

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

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

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

As the Eco-Dog sponsor, the San Francisco SPCA encourages the GGNRA to develop its draft compliance-based approach into an adequate adaptive management program, as a common element to all alternatives. Eco-Dog has carefully reviewed and used the approach proposed in the draft Plan/DEIS as the starting point for recommending a framework for a compliance-based adaptive management program (enclosed). Eco-Dog and San Francisco SPCA look forward to discussing these recommendations with you, as you develop the final Plan/FEIS. We stand ready to be part of the solution. We ask GGNRA staff to build a conservation partnership with the community for the effective and long-term preservation of dog walking recreation and natural values in the Golden Gate National Recreation Area.

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

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

Correspondence ID: 4693 **Project:** 11759 **Document:** 38106
Received: Jun,01,2011 00:00:00
Correspondence Letter

Type:

Correspondence: Dear Mr. Dean,

Thank you for the opportunity to comment on the Golden Gate National Recreation Areas (GGNRA) Draft Environmental Impact Statement/Draft Dog Management Plan (DEIS).

Overall, I found that the DEIS contains some serious fatal flaws including, but not limited to the following:

1. The DEIS bases its conclusions on conflicting, untested statements and fails to provide evidence to substantiate its conclusions and justify the actions called for under the proposed management plan.
2. The DEIS fails to put the GGNRA into its proper context as an urban recreation area next to a dense metropolitan area. It fails to, evaluate impacts on the "bulban" environment by not evaluating the loss of recreational opportunities afforded by the GGNRA under the proposed action.

These critical errors lead to a flawed alternatives analysis, especially in the selection of the environmentally preferable alternative. Because the alternatives analysis, provides decision-makers with an understanding of the effects of their decisions, this is a very serious flaw in the overall analysis of the proposed action. NEPA is not limited to the natural environment ' a DEIS must consider impacts on both the, human and natural environment. Under NEPA, the human environment shall be interpreted to comprehensively include the natural and physical environment and the relationship of people within that environment. The proposed action is overly restrictive in part because it is based on an illogical, unsubstantiated, and incomplete analysis of impacts,

Additional` details on "these errors" and other serious errors are prOvided below along with my recommendatiOns-to study an alternative that balances the natural, cultuTOL and recreational value of the GGNRA.

Lack of Analysis of Impacts on Recreational Resources ? The DEIS fails to describe how the GGNRA fits within its urban context as a recreation area next to a dense urban environment. It fails to provide the reader with an understanding of the relationship of the GGNRA with the human environment.

? Really, this is about people as much as it is about dogs since every dog that's out there is with someone who is walking and exercising with him or her. People need to recreate more, not less.

? The DEIS should be revised to include a stand-alone "Recreation" section.

This section should describe existing recreational opportunities, the impacts of the proposed plan on recreational opportunities (including indirect and cumulative impacts), and the mitigation that the NPS will commit to in order to avoid such impacts.

The EIS fails to describe and evaluate the direct impacts on existing recreational uses of the GGNRA and, by direct correlation, the impacts on the quality of the surrounding urban environment. Direct impacts are those that would substantially impair or diminish the recreational features, attributes, or activities currently available to GGNRA visitors.

The EIS fails to describe and evaluate the indirect impacts on areas in close proximity to the GGNRA, including indirect impacts that substantially impair or diminish the features, attributes or activities currently available to nearby parkland visitors. The EIS should provide a detailed evaluation of the potential for increases in visitor use of nearby recreational facilities and related impacts.

The EIS fails to evaluate the cumulative loss of recreational opportunities and access to recreational facilities especially within the context of a dense urban environment. The list of cumulative projects should include a comprehensive list of past present and future actions that could affect recreational opportunities.

The EIS fails to provide the reader and decision makers with a current and therefore meaningful understanding of the number type and origin of visitors who recreate in the GGNRA and its vicinity. A recreation use and needs study should be conducted to adequately present the affected environment and determine the environmental consequences.

In chapter 3, Affected Environment (Section on Visitor Use and Experience) the DEIS fails to describe park facilities and existing accessibility to those facilities in the areas where dog walking currently occurs. This section should be revised to describe these facilities including bathrooms and accessibility to trails. In chapter 4, Environmental Consequences section on visitor use and experience, the DEIS fails to describe impact on users especially mobility impaired users of those facilities and currently accessible trails. The DEIS should be revised to describe these impacts and commit to mitigation of such impacts.

Lack of Good Faith Effort to Understand Dog-related Impacts The DEIS fails to disclose the acreage of land currently accessible to dogs (on and off leash) under the no action alternative and the acreage of land that would be accessible with implementation of the action alternatives. Failure to include this information prevents a meaningful evaluation of the impacts of the

action alternatives against the no action alternative.

The EIS fails to disclose the acreage of lands currently used by snowy plovers and how much of that land is accessible to dogs (on and off leash). This information should be provided for the no action alternative and under each of the action alternatives. Failure to include this information prevents a meaningful evaluation of the impacts of the action alternatives and disclosure of how the management actions achieve the Purpose and Need.

The DEIS bases its conclusion on the fact that dogs are the sole culprit of adverse environmental issues in the GGNRA. This is a problem for at least three reasons: 1) There is much scientific controversy over the effects of dogs in natural areas and the DEIS fails to disclose this controversy. Areas of Controversy are required to be disclosed per the CEQ regulations 40 C.F.R. 1502.10-1502.18. The DEIS should discuss other opinions about dog related effects on natural areas, including the Megan Warren report (Megan Warren, "Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover. UC Berkeley Environmental Science, Senior Research Seminar. May 7, 2007 - attached). This failure demonstrates the bias of the DEIS authors and should be revised to include this information to provide a balanced description of impact to decision makers.

2) The DEIS lacks site specific data to demonstrate the adverse effects are indeed caused by dogs. It should be revised to provide a site by site assessment of the conditions of the GGNRA resources and values at each of the 21 sites. For example, in Chapter 4, Environmental Consequences section on special status species, the DEIS fails to provide adequate scientific evidence connecting dog related activities with impact on snowy plover populations. The DEIS should be revised to include such evidence.

3) The DEIS fails to disclose the competing uses of the GGNRA land and their impacts. Therefore, impacts related to dog activities are not properly put into context. Because the section fails to discuss these competing uses, it inaccurately characterized the affected environment and therefore prevents an informed discussion about the contribution of dog walking to impacts on the visitor experience. The DEIS should be revised to describe the competing uses of GGNRA lands and describe and evaluate the contribution of dog-related activities.

Given the flawed basis upon which the analysis relies, the conclusions in the DEIS are also flawed. The evaluation of alternatives is distorted and inaccurate given the unsubstantiated conclusion about dog effects on natural areas.

Lack of Analysis of Indirect Effects Chapter 3, Affected Environment, and

Chapter 4, Environmental Consequences, are both inadequate in that they fail to discuss nearby local and regional areas where dogs are allowed on- and off-leash and the impacts on these areas due to the proposed implementation of the Dog Management Plan. These areas will experience indirect impacts with implementation of the Dog Management Plan since dog owners and professional dog walkers will increase their use of these areas as soon as the plan is approved. The DEIS should be revised to describe these impacts and commit to mitigation of such impacts. Again, The EIS fails to provide the reader and decision-makers with a current and, therefore, meaningful understanding of the number, type, and origin of visitors who recreate in the GGNRA and its vicinity. A recreation use and needs study should be conducted to adequately present the affected environment and determine the environmental consequences.

Another area of indirect effects is related to the increased amount of traffic that the Bay Area will experience if dog walkers ' private and professional ' need to find alternative areas to give dogs their proper exercise. These indirect effects include traffic, air quality, traffic noise, climate change, etc. These effects need to be studied in the revised EIS..

Improper Dismissal of 'Critical Analyses In the section on Issues and Impact Topics Dismissed from Analysis, the "Natural or Depletable Resource Requirements and Conservation Potential" topic was inappropriately dismissed from the environmental consequences analysis and was inappropriately limited to facility design and development. Since the alternatives will indeed have an appreciable effect on the natural resources of non-GGNRA lands, an adverse effect would occur under this topic that is not discussed in the DEIS. This topic need to be objectively evaluated in the DEIS; it should consider indirect effects on natural, non-GGNRA lands.

In the section on Issues and Impact Topics Dismissed from Analysis, the "Urban Quality and. Design Ofthe Built Environment": topic was inappropriately dismissed , from the environmental consequences analysis. The alternatives will indeed-have an appreciable effect on the quality of the urban environment sicne ther will be an appreciavle loss of urban recreation opportunities.. And, more dogs will receive urban-ohly walks: Therefore, there will be more diogS on city streets and more dogs will suffer from anxiety, leading to aggression issues, without the benefit of access to GGNRA lands. This topic needs to be objectively evaluated in the DEIS; it should consider indirect effects on urban, non-GGNRA lands.

In the section on Issues and Impact Topics Dismissed from Analysis, the "Socioeconomics" topic was inappropriately dismissed from the environmental consequences analysis. The cost-benefit analysis needs to be performed as part of the DEIS to substantiate the claims that plan

implementation would have a negligible socioeconomic effect.

Flawed Alternatives 'AnalySis The range of alternatives is inadequate as it,constrains the possible choice of options available to decision-makers. The NPS should expand its range of reasonable alternatives to include a robust and long7terin,adaptiVe,inanagement plan, a substantial public education program, and natural fencing in appropriate areas. The rejection,' of: from the alternatives (Chapter 2, page 92) is not reasonable. Some.degree of natural barriers/fencing in choice Iodations would, not substantially,affect,the aesthetic landscape Or binder wildlife movement. The ,DEIS fails to include a reasonable range of feasible,alternatiVes: inclusion Of these ideas could accomplish the stated objectives of the NPS while balancing the needs of the users of GGNRA lands. Lack of Documentation/Unsubstantiated Conclusions/Inaccuracies The DEIS fails to profive documentation for the enforcement data presented in the dosument or put the data into context in terms how dog related violatoinis compare to overall violatons. See CHapter 3, page 269 for one example of this issue. Furthur to this point the DEIS does not provide any reasonable evidence that visitation to the park will increse through hteh 20year plan horizon of that such increases will result in more dog realted violations. In chapter 3 , page 269, the DEIS states that "The DEIS is clear that there is no correlation between population growth and annual visitation"

Table 9 - SUMMARY OF VISITOR USE AND PET RELATED CITATIONS, WARNINGS AND REPORTS TAKEN AT GGNRA (including reference to Appendix G, Golden Gate National Recreation Area - Pet related Incident; Law Enforcement adn US Park Police data) Is flawed because :

- 1) 2007-2008 data are too old to characterize the affected environment of 2011
- 2) Table and associated text fails to characterize the extent to shihc NPS has notified the publis about the laws of do walking in GGNRA lands and whether signage on park property were placed appropriatly.
- 3) The data that are based on "best professional judgment (Table endnote "e") are not.cited/documente&with records of communication The DEIS fails to allow for Meaningful debate to Whenitbases its determinations on questions posed to'park staff about their recollections,of violations that took place several years ago without any documentation of these memories or records of communication.
- 4 "Percentage of Visitors Walking Dogs" column is largely based on data fom 2.096 (NPS 2006g). These data are over 5 years old and can hardly be

,applicable to current conditions.

5. Appendix G data upon which Table 9 are largely based are unsubstantiated Appendix G contains: no source documentation.

In Chapter 3, page 279, Telephone survey conducted by Northern Arizona University (2002): ;data from this-2002,, survey are almost 10 years old. The document thus fails to use current data to characterize the affected environment. In addition, in most cases the representative quotes of surveyed visitors presented in the DEIS are negative and inflammatory even though only a small amount of user surveyed (22%) reported off leash dogs detracted from their visitation experience. The other 80% of surveyed visitors were not quoted in the section, demonstrating that the setting is based on the authors bias and subjective opinions against the backdrop of untested and outdated assumptions.

In Chapter 3, page 242 References to Appendix G:

1. "Off-leash dogs have frequently been observed in Redwood Creek and Redwood Lagoon despite these closures (NPS 2008c (appendix G);" Statements like this one are based on subjective opinions and untested assumptions. The statement that off-leash dogs have frequently been observed in these areas is unsupported by the evidence in Appendix G. The word "frequently" is broad and vague and not meaningful in this context given that the data in Appendix G is only based on a years worth of observation in 2007 and unsupported by records of communication
2. "However these closures are not always followed; a citation was issued for a dog in the creek in 2006 (NPS 2008c(Appendix G))." This statement is inaccurate since the data in Appendix G is from 2007
3. "However, despite education and, enforcement efforts, current compliance with the 2008 seasonal protection rule remains low, as described in the "Vegetation and Wildlife" section and the "Visitor Use and Experience" section under "Visitor Use by Dog Owners" (NPS 2008c (appendix G))." The DEIS fails to provide the reader with a way to distinguish between scientific evidence and subjective opinion. Contrary to the cited statement, no violations of the Ocean Beach SPPA are listed in, Appendix G for 2007 and only 2 violations were cited in 2008. For Crissy Field, 17 violations were cited in 2007 and no violations in 2008. On what basis does the NPS determine that this constitutes "low" compliance?

In Chapter 4, pages 1566-1568, the DEIS states:that "Visitation is predicted to. continue to increase over the next 20 years, and it is likely that the number of dog walking noncompliance citations and visitor conflicts would continue to increase even under the no action alternative, resulting in

increasing labor for LE officials related to dog management." No citation is provided for this claim. The DEIS does not provide any evidence that connects increase in park visitation with increases in violations. In Chapter 3, page 269, the DEIS states that, "The DEIS is clear that there is no correlation between population growth and annual visitation." The DEIS bases its conclusions on conflicting, untested statements and fails to provide evidence to substantiate its conclusions.

Flawed and Incomplete Cumulative Analysis In Chapter 4, page 1568 and Appendix K, the DEIS states that "At QGNRA, elevated threat levels require Closures in and around Fort Point, the Coastal Trail, and Fort Baker. These closures may preclude dog Walking in those areas..." Based on this information, the DEIS fails to include a comprehensive list of cumulative projects that could affect dog walking in GGNRA areas. Therefore, the cumulative assessment is inadequate and should be revised to consider all of the past, present and future actions that could affect dog walking in GGNRA areas. Indeed, many actions have been taken over the years to limit the amount of land open to dogs, both on- and off-leash. The NPS state (2002a) that, "...leash restrictions have occurred over the last ten years. ...local dog owners who prefer off leash, recreational use have moved to GGNRA." Similarly, the cumulative impacts analysis should consider future plans to curtail recreational opportunities for dog owners/walkers including the proposed San Francisco Natural Areas Management Plan. The DEIS should be revised to evaluate the cumulative impacts on dog owners/walkers in relation to the cumulative loss of on- and off-leash dog walking opportunities; The DEIS should evaluate how recreational activities for dog owners/walkers have been curtailed over the years and how the proposed Dog Management Plan contributes to this cumulative impact. The DEIS should commit to mitigate these cumulative impacts

Flawed Visitor Use Section In Chapter 4, pages 1401-1562:

1. This section fails to disclose the visitor use and experience from the perspective of the dog owner/walker. The analysis is skewed to only consider the experience of the park users who do not favor dogs in the park.
2. The impact determination related to visitors who prefer dogs under Alternative 1a is flawed. Given that dogs will no longer be allowed in the parking and picnic areas, the DEIS fails to disclose how that impact is determined to be "minor,, which, according to page 1403, constitutes a change in visitor use and experience that "would be slight and detectable, but would not appreciably limit or enhance any critical characteristics of the visitor experience." Not allowing dogs in areas where dogs were allowed previously does not fit into this category of "minor." The DEIS provides no explanation of how it reached this conclusion. The DEIS should be revised to reflect the true impact of this Alternative and explain the rationale for its

conclusions:' 3.The impact determination related to indirect impacts on adjacent parks under this Alternative is flawed. For example, on page 1412, the DEIS states that the impacts on nearby parks under Alternative D, which prohibits dogs in the parking and picnic areas at Stinson Beach to be negligible and "minor." Given that dogs will no longer be allowed in these areas, it is unclear how the DEIS authors determined this impact to be negligible and "minor." The conclusions about impacts on nearby parks in this section are not based on fact or substantial evidence. Not allowing dogs in areas where dogs were allowed previously will absolutely affect the use of adjacent areas and the DEIS does not disclose this impact. The DEIS provides no explanation of how it reached its conclusions. The DEIS should be revised to reflect the true impact on Visitor Use and Experience, explain the rationale for its conclusions, and commit to mitigating all direct, indirect, and cumulative impacts.

4. The impact determination related to visitors who prefer dogs under the alternatives is flawed. Given that dogs will no longer be allowed to walk off-leash, the DEIS fails to disclose how this change in policy or adverse impact is determined to be "minor." The DEIS provides no explanation of how it reached this conclusion. The DEIS should be revised to reflect the true impact of the Alternatives on users of Homestead Valley and explain the rationale for its conclusions. Flawed Human Health and Safety Analysis ? In Chapter 4, pages 1591-1724 The conclusions in the environmental consequences section on Human Health and Safety are flawed because they fail to consider effects on people who rely on dog walking for health benefits. They are also flawed because they fail to consider the effects of reducing access to dog walking areas on seniors and mobility-impaired people who would no longer have the same degree of access to dog walking trails and restroom facilities under the proposed action. The DEIS should be revised to reflect these impacts and commit to mitigation. In addition, the affected environment related to Human Health and Safety is flawed because it fails to present the human health benefits of dog walking and experiencing one's dog run and play off-leash. In addition, the affected environment related to Human Health and Safety is flawed because it fails to present the accessibility requirements of seniors and mobility-impaired park users who walk their dogs in GGNRA lands,

? In Chapter 3, page 286, the DEIS states that, "Most of the issues related to the health and safety of park visitors are related to the nature of their encounters with unruly/aggressive dogs." This statement is not based on facts and its veracity is questionable because its assertions are not documented or cited with scientific evidence or verifiable records of communication.

Other/Miscellaneous Errors In Chapter 3, page 281, the document fails to quantify the degree to which minority and low-income populations use

GGNRA lands. Therefore, the claims that off-leash dog walking adversely affects minority and low-income populations are unsubstantiated. In addition, the authors show their bias against dogs walking by only quoting negative, inflammatory and extreme remarks from those questioned by phone in the survey. Recommendation for Cornproinise Alternative Based on the aforementioned comments, the DEIS does not justify the extremely harsh level of management in the proposed action. The proposed action should be modified to maintain recreational opportunities in a manner that is in keeping with the 1972 enabling legislation of the GGNRA. Some of the management tools could include: ? A long-term adaptive management plan; A substantial public education program; ? Fencing areas using native plants and environmental design principles; Constructing additional trails;for dogs in non-sensitive areas; ? Erosion control measures/best management practices; Limiting off-leash commercial dog walking. to weekdays; and Greater enforcement.

I challenge you to develop a plan that more appropriately uses the tools you have at your disposal to avoid compromising the myriad values of the GGNRA and the ability of its neighbors to enjoy its recreational opportunities.

Thank you for your, consideration of these comments. Regards,

Marissa Adams Enclosure: Megan Warren, "Recreation Disturbance Does Not Change Feeding Behavior of the Western Snowy Plover. UC Berkeley Environmental Sciences, Senior Research Seminar. May 7, 2007 - attached Scott Weiner, San FranciSco Board of Supervisors, District 8 Eric Mar, San Franciscd Board of Supervisors, `DiStrict Senator Diane Feinstein':Senator Barbara Boxer Congresswoman Nancy Pelosi

Correspondence ID: 4694 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Superintendent Dean,

Attached please find the Congresswoman's comment letter on the GGNRA dog management plan that she would like to officially submit for processing. She asked that I thank you for taking the time yesterday to talk through a number of the issues; it was helpful to her evaluation. Please let me know if you have any questions.

Enjoy your weekend, Alana Alana Paull, Esq. Senior Legislative Assistant
Office of Congresswoman Jackie Speler 400 S. El Camino Real, Suite 410
San Mateo, CA 94402

Correspondence ID: 4695 **Project:** 11759 **Document:** 38106

ID:

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Type:

Correspondence: Dear Superintendent Dean:

Thank you for the opportunity to submit comments to the Draft Dog Management Plan / Environmental Impact Statement (-Draft Plan" and -DEIS-, respectively) released on January 14, 2011. These comments are submitted by the Golden Gate Audubon Society (-GGAS-) on behalf of its approximately 10.000 members and supporters in the San Francisco Bay Area who use and enjoy the Golden Gate National Recreation Area (-GGNRA-) and are concerned about the continuing impacts of dog-related recreation on the natural and historical resources of the park.

There is no doubt that the National Park Service (-NPS-) must enact new regulations to manage dogs and dog-related recreation in the GGNRA. All national parks are national treasures. intended to be used and enjoyed by all visitors, but only to the extent that their natural and cultural values are not permanently impaired. (NPS Organic Act) The GGNRA is a particular treasure, given that it is was created to serve urban residents, many of whom lack the opportunity to travel to more "wild- areas like Yosemite or Yellowstone. Moreover, the GGNRA is home to more endangered species than Yosemite. Sequoia, Death Valley and Kings Canyon National Parks combined, and one of the highest concentrations of sensitive species in the U.S. NPS has attempted to implement the 1979 Pet Policy with education, signage and enforcement, but its efforts have failed. Non-compliance with existing regulations is extremely high and the number of park users, including those bringing dogs, is growing, resulting in greater impacts and more conflicts. The 1979 Pet Policy is both unsustainable and illegal.

Under the Preferred Alternative. the Draft Plan constitutes the largest accommodation of dogs into any national park in the country. This will undoubtedly result in significant, long term impacts on park resources and other park users. Indeed, 36 C.F.R. ' 7.97, which prohibits unleashed dogs in National Parks and restricts leashed dogs to only a few paved areas, was created because NPS recognized that dogs pose risks to park resources, visitors and employees. The wisdom behind 36 C.F.R. ' 7.97 has been supported again and again by an abundance of scientific studies and incident reports, which demonstrate that insufficient dog management in natural areas results in significant negative impacts on the wildlife, plants, and habitats,I a diminished the park experience for other park users and risks for park employees,2 and the exposure to risks of attacks and other hazards for

dogs.'

GGAS is sensitive to the needs and concerns of dog owners and believes that effective dog management can be implemented in the GGNRA without impinging on the socialization or health of dogs in the Bay Area. We are also aware that many dog owners are responsible guardians and that they keep their dogs on leashes when required and pick up after them. Given that the City of San Francisco has more off-leash dog recreation areas than any other city in the United States and given that the GGNRA will continue to welcome dogs into large tracts of its land in San Francisco, we are confident that responsible dog owners will have ample opportunities to recreate with, exercise and socialize their dogs.

GGAS appreciates the effort put into the documents by the National Park Service staff and members of the community that participated in the negotiated rulemaking effort. While we continue to have substantive concerns about the Draft Plan and the DEIS, we believe the document represents a significant step in the right direction to protect the GGNRA's resources for perpetuity.

Our comments begin by addressing overarching concerns with the Draft Plan and DEIS, including: 1) All regulated off-leash areas ("ROLA") must be enclosed. If enclosures are inappropriate in a given area due to biological, cultural, aesthetic or physical limitations in an area, then it should not be designated as a ROLA; 2) The GGNRA should provide more opportunities for visitors to hike in the GGNRA in San Francisco without interacting with dogs. Currently, the Preferred Alternative provides for only a single trail where visitors, including those with small children, may go without being forced to interact with dogs. This is not fair to community members that have a right to enjoy the park without fear or discomfort due to the presence of dogs. 3) The Park Service should not permit commercial dog walking within the GGNRA. The Park Service may only permit commercial activities that further the park visitors' experiences. Commercial dog walking does not further any person's park experience. 4) The 75% compliance-based management threshold is too low. The very low threshold for compliance, essentially, a "C" grade, perpetuates the culture of non-compliance that has persisted in the GGNRA and resulted in the current and ongoing impacts to the park resources and visitors. Dog owners are more likely to comply with new regulations if a culture of compliance is developed by requiring a higher level of compliance. Moreover, allowing at least 25% non-compliance will result in continued negative impacts to park resources. 5) The DEIS fails to establish that "voice control" is a valid method of controlling off-leash dogs. As demonstrated in the Criminal Incident Reports produced by the Park Service's rangers, dogs that are ostensibly under "voice control" do not respond accordingly. GGAS is unconvinced that this is a valid means for protecting park users, wildlife,

habitats and other dogs. Our comments next address the Preferred Alternative and potential variants in San Francisco County. In general, we endorse Alternative D, which is the most environmentally-protective alternative, with the caveat that all ROLAs should be fully enclosed. We have deviated from Alternative D for specific areas in San Francisco where we believe dog-related recreation may be less harmful to the park experience and resources in the hope that a reasonable compromise may develop in the final plan.

While many of our general concerns reach to the Draft Plan as proposed for the whole park, we have restricted our site-specific comments to areas in San Francisco. While our members have concerns about the alternatives and their elements in Marin and San Mateo Counties, we defer to the Marin Audubon Society and the Sequoia Audubon Society, respectively, based on their local expertise and representation of local community members. We join in and support the comments submitted by both groups, as well as comments provided by the San Francisco Bay chapter of the Sierra Club, Nature in the City, the California Native Plant Society, and the Wild Equity Institute. I. GENERAL CONCERNS A. The DEIS Should Better Document the Impacts Dogs Have on Native Wildlife, Plants, and Habitats and on Other Park Users. While the DEIS clearly states that dogs have negative impacts on native wildlife, plants, habitats and on other park users, the Park Service failed to include an adequate and comprehensive reflection of the overwhelming body of evidence demonstrating these impacts. L"3.) Frankly, had the Park Service included a more comprehensive review of the reports and studies documenting the effects of dogs on biological resources, some of the speculation, rumors, and misinformation that arose regarding the DEIS could have been avoided. Perhaps more importantly, local elected officials would have had a better understanding of the need for effective dog management in the GGNRA to protect local citizens, and natural values and better decisions regarding support or opposition for the plan could have been made.

To remedy this deficiency in the DEIS, the Park Service should revise the portions of the DEIS that discuss these impacts to better demonstrate the significant and overwhelming evidence on this point and include citations to all available reports, studies and data on the topic in a comprehensive bibliography. As currently written, the language appears to provide conclusions without support. Specifically, Chapter 1 of the DEIS includes sections on the "Impacts of Dogs on Natural and Cultural Resources in the Park- and "Visitor Use and Experience", but both sections are very sparsely supported by citations to relevant studies, including studies provided by the public during the scoping period. (See DEIS at pp. 13-20)

The DEIS would be greatly improved if the Park Service conducted a year-by-year review of all reports of dogs interacting with wildlife, including all

off-leash within the GGNRA. By failure to clearly demarcate where off-leash activity will be allowed, the GGNRA will perpetuate some of that confusion resulting in the need for continuous education and enforcement efforts.

Fencing or similar physical containment will definitively delineate the ROLA boundaries and effectively eliminate the potential for off-leash dogs to conflict with park visitors and wildlife. The borders of the ROLAs must be clearly defined in a manner that will easily communicate the boundary lines to all park visitors. Well defined off-leash areas provide dog owners with greater certainty as to where on- and off-leash dog activities are appropriate. Moreover, visitors to the GGNRA should have a choice whether or not to interact with off-leash dogs. Many visitors who would prefer not to interact with dogs at all in a national park are, for the most part, forced to accept that inevitability, even under the Preferred Alternative. However, because of the wide range of problems that arise with off-leash dog activity, including unwanted advances by dogs and, possibly, threats or attacks, visitors should be given the option to "opt-out" of interacting with off-leash dogs. A fenced boundary would give all visitors ample notice before entering an off-leash area.

It appears that the Park Service rejected requiring enclosures because of concerns regarding impacts to biological or aesthetic resources. However, the DEIS is woefully incomplete in its analysis of the kinds of enclosures that could be used to establish ROLAs. Fences need not be large or impermeable structures. For example, a "post-and-cable" fence would provide a well-defined boundary for dog owners and other park visitors without creating a barrier that results in impacts to biological resources or aesthetic values. Other, more creative options are available, such as vegetation-based barriers that create habitat, keep with the park's natural aesthetic, and provide the clear boundaries that provide for a safer, better regulated park.

An area should only be considered as a possible ROLA if it can be fully enclosed or otherwise made physically distinct from other portions of the park. If it cannot be enclosed, the area should be considered for another alternative use (on-leash only or no-dog). The Park Service is under no requirement to provide ROLAs. Moreover, dog owners in San Francisco have again and again demonstrated an unwillingness to comply with rules in areas that were not well-defined. Enclosures are necessary to provide dog owners with sufficient warning about where on- and off-leash recreation is appropriate and to provide other park visitors with the assurances and safety they deserve when visiting a park. GGAS provides more specific comments regarding ROLAs proposed in San Francisco in Section III below.

C. The GGNRA Should Not Permit Dog Walkers to Have More than Three

Dogs per Person and Commercial Dog-walking Is Not an Appropriate Activity in the GGNRA.

The DEIS indicates that commercial dog walking would be allowed under alternatives B, C and E. (DEIS, at 63) The allowance for commercial dog walking would come through a special permit allowing any person to bring up to six dogs into the park. First, we do not believe that allowing any person to bring more than three dogs into the park at one time is advisable, regardless of whether they are a commercial dog walker. In any event, it is our belief that commercial dog walking is currently not legal within the GGNRA and furthermore, does not meet the National Park Service criteria for permitting.

Currently, dog management guidelines for the GGNRA are set forth by the 1979 Pet Policy which the DEIS identifies as Alternative A. The 1979 policy provides guidelines for dogs to be within the GGNRA under the supervision of their owners and makes no reference to commercial dog walking. However, commercial dog walking within the GGNRA occurs on a daily basis, and though no permitting process has been established, it is tolerated by the Park Service. This commercial activity has significant negative impacts on the park and is in violation of 36 CFR ' 5.3 which stipulates that non- permitted commercial activity is prohibited on National Park lands. The DEIS states that the National Park Omnibus Management Act of 1998 provides guidance for the issuance of commercial use authorizations and concession contracts. (DEIS, at 39) Title IV Sec. 418 of this act specifies that authorization shall only be granted to commercial ventures that "provide services to visitors to units of the National Park System," Commercial dog walking services do not provide any services for park visitors. Their activities are more closely analogous to timber extraction or mining' essentially. a commercial venture profiting from using (and creating impacts on) park resources. Therefore, the activity does not qualify for authorization and should not be allowed under any alternatives of the DEIS.

GGAS understands that this is an extremely controversial position and that it may seem unfair to many commercial dog walkers that comply with leash requirements, pick up after their charges, and maintain control over their dogs at all times. However, we have seen commercial dog walkers again and again unload very large numbers of dogs at Ft. Funston and in other parts of the GGNRA and essentially letting the dogs roam uncontrolled. These activities seem only to be growing. Not only do these activities result in significant negative impacts on the park, they perpetuate the culture of non-compliance that leads other, more responsible dog owners to conclude that the regulations are not applicable, or at least enforced.

D. The Draft Plan Does Not Include Adequate Enforcement Mechanisms to

Ensure Compliance with New Rules.

Even under the extremely lax 1979 Pet Policy, compliance with leash requirements in the GGNRA has been extremely poor. The failure of the Park Service to regulate its lands mirrors the "culture of non-compliance" that permeates in the City of San Francisco, where city officials have acknowledged that many dog owners fail to comply with leash and pet waste requirements.

Non-compliance with leash requirements is the status quo in the GGNRA, particularly at Ocean Beach and at Crissy Field. Volunteers monitored snowy plovers within the Crissy Field Wildlife Protection Area ("WPA") during the 2006/2007, 2007/2008, 2008/2009 and 2009/2010 snowy plover "wintering" seasons (July through March). In addition to counting all snowy plovers, observers recorded incidences of humans and dogs within the WPA and noted whether disturbances to the snowy plovers or other wildlife occurred.

During the 2006/2007 season, compliance with the leash requirement in the WPA was approximately 29%. During the 2007/2008 season, compliance fell to approximately 27%. Compliance improved to approximately 34% during the 2008/2009 and 2009/2010 seasons. Anecdotal evidence indicates that the non-compliance rate is even higher on Ocean Beach despite the significantly larger population of threatened snowy plovers and other shorebirds that depend on the beach there. Golden Gate Audubon understands that NPS rangers have a wide range of responsibilities and that they are understaffed. However, by failing to police dog walkers within the GGNRA, NPS has contributed to the permanent impairment of the natural resources there. Moreover, it has created a sense of lawlessness and entitlement within the community that promotes even greater non-compliance.

The Draft Plan and DEIS would be greatly improved if it included more specific information about the extent of non-compliance in the GGNRA and in San Francisco. Data on non-compliance with leash (and other pet control) requirements in San Francisco is relevant to the analysis in the DEIS because it demonstrates the culture of non-compliance that exists in San Francisco.

Finally, compliance oversight should be required for as long as dogs are allowed within the GGNRA. We are concerned that the compliance oversight may be of limited duration and that once it is complete, non-compliance will likely escalate (especially if enforcement remains at historic levels). The compliance program should be considered as a cost of allowing dogs in the GGNRA in perpetuity.

E. The Draft Plan Fails to Provide Adequate Opportunities for Dog-free Recreation on Trails in San Francisco. Under the Preferred Alternative, dogs will be allowed on leash on all but one trail in the GGNRA in San Francisco. Therefore, visitors to the park who prefer not to interact with dogs will be restricted to a single trail. In short, the Park Service's overly generous effort to accommodate dog owners means that other users must endure a large number of dogs throughout the GGNRA in San Francisco or simply not visit the park.

The DEIS does not include adequate consideration of users that are less likely to use the park or have their park experiences diminished because of the presence of dogs. GGAS believes that a better study of the impacts of dogs on other park users and potential users would improve the Draft Plan and DEIS and should be conducted and incorporated before the FEIS is produced.

F. The DEIS Does Not Establish that "Voice Control" Is a Valid Method for Controlling Off-leash Dogs in the GGNRA.

Many of the Alternatives, including the Preferred Alternative, rely on "voice control" a means for controlling off-leash dogs. While the DEIS provides a somewhat broad definition of "voice control", it provides no basis or evidence that demonstrates that visitors to the park (or their dogs) have adequate training and discipline for "voice control" to work.

Again, a review of the Criminal Incident Records is informative on this topic. Several Criminal Incident Reports from 2008 demonstrate that again and again, dog owners who let their dog off-leash in the GGNRA cannot control their dogs merely by vocal commands.

Moreover, the DEIS and Draft Plan are fatally flawed by determining that a dog is under "voice control" merely because it comes when called by the owner under casual or non-emergency situations. True "voice control" would require that a dog responds to vocal controls when excited or under duress. For example, a dog would stop when commanded when chasing wildlife, charging a park visitor, or attacking a dog.

The only way to ensure that dog owners visiting the park have the ability to vocally command their dogs is to require permits prior to entering the park. Each dog owner would be required to pass a test ensuring that they can verbally control their dogs to prevent illegal harassment of wildlife, trampling of native plants, or assaults on other park visitors or dogs. In the absence of a license or permit system for dog owners, the Park Service has no way of ensuring that a real "voice control" system will be in place in the ROLAs. At a minimum, the Park Service must acknowledge the limitations

of relying on voice control in the FEIS and final plan.

Finally, the lack of true voice control by most dog owners in the GGNRA bolsters the arguments that: 1) all ROLAs should be enclosed to reduce opportunities for uncontrolled dogs to interact with other park visitors and wildlife; 2) park visitors should be restricted to no more than 3 dogs per person because it is highly unlikely that even a well-trained dog walker can keep voice control over more than 3 dogs at a time; and 3) the 75% compliance requirement set by the Park Service is too low, because that means approximately 25% (or more) off-leash dogs not on voice control will be tolerated in the park, resulting in ongoing impacts to other park visitors, dogs (especially dogs on leash), and wildlife.

G. The DEIS Fails to Address Impacts to Other National Parks as a Result of the Preferred Alternative.

Through the Draft Plan and the Preferred Alternative, the National Park Service is proposing for the first time to accommodate dogs off-leash throughout large portions of a national park unit. The DEIS does not adequately address the impacts to other National Park units. As a conservation organization, Golden Gate Audubon sympathizes with the mission and values of the National Park Service particularly toward protection and preservation of natural resources. As such, we believe that the best protections for natural resources would be to have park rules that are consistent with those of the nationwide system of National Parks.

We are very concerned about the public perception of national park values and the beliefs and behaviors that park visitors will take with them to other units of the National Park System. In recent years, GGAS members have observed an increasing level of on-leash and off-leash dogs on (and off) the trails of other National Parks including Lassen Volcanic National Park and Yosemite National Park. We believe that lax policies of the GGNRA could be contributing to public misperception of the standard nationwide rules pertaining to pets in our National Parks. We also believe that the Park Service has public educational responsibilities to instill park values and proper behavioral practices into the public mindset.

The DEIS should address the public perceptions of National Park values and the potential impacts of the dog management alternatives to the rest of the National Park System.

H. The DEIS Does Not Adequately Explain How or Why the Park Service is Allowing the Continued "Take" of Endangered Species and Other Protected Species by Dog Owners without Permits.

The DEIS acknowledges that harassment of snowy plovers by people or

their dogs constitutes a violation of the federal Endangered Species Act, 16 U.S.C. " 1361 et seq. (See DEIS at 1240 ("Chasing of plovers clearly meets the definition of harassment and take under the ESA of 1973")) The DEIS also acknowledges that harassment of wintering birds may have negative impacts on the overall population of the species and individual survivorship and fecundity.' (k ., citing USFWS. 2007. Recovery Plan for thPacific Coast Population of the Western Snowy Plover, at 65).

The Park Service is a federal agency with responsibility for stewardship over these threatened species and many other species covered by the Endangered Species Act, the Migratory Bird Treat Act, and other applicable laws on park lands. Yet, the Park Service has never explained the legal basis for permitting the ongoing harassment and harm to the snowy plover at Crissy Field and Ocean Beach. Specifically, the DEIS does not explain how the Park Service can knowingly allow dog owners to persistently and perpetually "take" snowy plovers in the GGNRA through harassment.

For example, the DEIS lists several of the impacts that dogs have on snowy plovers. (DEIS at 1240). However, the DEIS never explains why these disturbances do not constitute a "take" of snow,,, plovers under the ESA. Nor does the DEIS explain why the Park Service can perpetuate these illegal takings through the new Dog Management Rule.

IV. SITE-SPECIFIC COMMENTS ON THE PREFERRED ALTERNATIVES FOR SITES WITHIN SAN FRANCISCO COUNTY.

Unless otherwise specified, GGAS endorses Alternative D for sites in San Francisco. We defer to comments provided by the Marin Audubon Society and the Sequoia Audubon Society for recommendations in Marin and San Mateo Counties, respectively. Site- specific recommendations for GGNRA areas in San Francisco are provided below.

A. Fort Mason Golden Gate Audubon supports the Preferred Alternative (Alternative C). This will leave the vast majority of Ft. Mason open to the current on-leash use. We note, however, that while under the current rule Ft. Mason is supposed to be an on-leash dog area, it is effectively an off-leash area due to lack of enforcement.

B. Crissy Field Crissy Field has been one of the most controversial areas for dog managemei It is a very active spot for local visitors and tourists. It is also an important wildlife area, adjacent to the Bay, the Pacific Ocean, and some of the largest woodland and coastal scrub habitat remaining in San Francisco. The DEIS should include a statement that wildlife viewing is an important activity at Crissy Field and that it should be considered in any decision about how dogs will be accommodated. The Park Service must consider all these values'not just the demands of dog owners'in deciding

how to regulate dogs in the area.

Except as discussed below. GGAS endorses Alternative D for Crissy Field. Specifically, GGAS believes that any ROLA established at Crissy Field must be fully enclosed (see Section 1.B above).

1. The DEIS underestimates impacts to snowy plovers from the Preferred Alternative.

The DEIS does not fully describe the significance of the existence of snowy plovers in the Crissy Field area. The following information should be considered:

1) The DEIS states that there is no record of snowy plovers nesting within the GGNRA. However, there are records of bird and egg specimens collected during nesting season. (See Grinnell, J. 1932 and Smithsonian Institution collection data). 2) The DEIS states that snowy plovers have consistently overwintered at Crissy Field since 2005. However, there are no data to suggest that snowy plovers have not been overwintering there prior to 2005. 3) The USFWS Recovery Plan for the Pacific coast Population of the Western Snowy Plover has identified Crissy Field as an expansion site for snowy plovers. (USFWS (2007), at 43-44, 140-141) 4) The Snowy Plover has cultural significance at Crissy Field. The Presidio of San Francisco is the Type Locality of the Snowy Plover, collected by Lt. William Trowbridge (Army Corps of Engineers, U.S. Coastal Survey), on May 8, 1854 (Grinnell, 1932)

2. The DEIS should estimate impacts under the Preferred Alternative under a scenario where dog owners continue to fail to comply with regulations.

The DEIS endorses the Preferred Alternative by concluding that it would have "minor adverse impacts" and "overall negligible impacts" assuming compliance with leash requirements. (DEIS, at 1244-1245) Crissy Field has suffered due to dog owners' unwillingness to comply with leash requirements, even in the Wildlife Protection Area (WPA). (See, e.g. DEIS at 1241 ("Despite education and enforcement efforts, compliance with the...special regulation establishing the seasonal leash restriction remains extremely low")) The DEIS should at least consider the possibility (which history indicates is likely) that compliance with leash requirements will not be achieved. Moreover, given that under the Preferred Alternative the WPA would be closed to dogs, the Park Service has no method for further protecting the site if dog owners refuse to comply with the regulations there. It is impractical to assume that park rangers will be able to patrol the WPA adequately to ensure full compliance with the new rules.

The Preferred Alternative would permit at least 25% of dog owners to

continue to fail to comply with the new regulations. The DEIS does not discuss whether this potentially large number of non-compliant dog owners and dogs will have significant negative impacts on the wildlife, habitat, and other visitors in the area.

2. The Crissy Field Wildlife Protection Area should be off-limits to dogs.

GGAS endorses the Preferred Alternative to the extent that it would disallow dogs in the WPA at all times. We do, however, have concerns about the placement of the east boundary fence. The DEIS states that the east boundary fence will be relocated 200 feet eastward at a position 900 feet from the NOAA pier. (DEIS at 60) We believe that the determination of fence placement should have more flexible parameters and that careful consideration should be given to the visual penetration effect and to the geographical conditions of the immediate area. Under the preferred alternative, off-leash dog activity directly adjacent to the east boundary fence will pose a visual threat that will penetrate into the WPA, effectively rendering a portion of the eastern WPA as non-viable habitat during daytime use hours. Given this concern, the fence should be placed a reasonable distance eastward, beyond the actual 900 foot border line, to allow for an adequate buffer zone. Additionally, the geography of the area of fence placement is somewhat complicated by non-uniform conditions which include a variety of substrates.-varying elevations, several lobes of fenced dune habitat areas. and a variety of pedestrian pathways. Consideration should be given to all of these conditions and fence placement should be such that it will accommodate ease of pedestrian traffic flow while maintaining adequate protection of the WPA.

3. GGAS endorses the Preferred Alternative for the Promenade (East Beach to the Warming Hut) The paved trail along the promenade is an appropriate place for on-leash dog activities at Crissy Field. GGAS remains concerned about undesired human-dog, interactions. especially for joggers and disabled visitors and those with small children, but believes that with proper education and enforcement of leash requirements, the area can successfully accommodate leashed dogs.

4. Any ROLA on the Airfield must be fully enclosed. The Crissy Airfield, a mix of native and non native plant species, is the largest expanse of grassland on GGNRA lands in San Francisco. The airfield is an important area for birds and other wildlife and is used by park visitors for its wildlife viewing opportunities. In recent years, observers have recorded more than forty species of birds using the field, including rare, vagrant species such as Cattle Egret. Red-throated Pipit and Lapland Longspur. The continued use of the Airfield as an off-leash area constitutes an impairment to the natural resources in the area.

However GGAS understands that the Draft Plan and DEIS represents an attempt to balance the competing interests of many groups. Therefore, Golden Gate Audubon does not oppose the creation of a ROLA in the Airfield, but only if the ROLA is full enclosed. Moreover, any enclosure must allow for other park visitors to cross the Airfield without being forced to interact with dogs. We believe it is possible to design the ROLA to be enclosed with post-and-cable (or a similar apparatus to distinctively mark the area) that will not impair the biological or aesthetic value of the Airfield and be removable for special events.

5. GGAS opposes off-leash dog activities on the Central Beach and supports Alternative D to prohibit dogs. GGAS opposes the Preferred Alternative, which could create a ROLA on Central Beach. All of the shoreline beaches at Crissy Field are suitable foraging and roosting habitat for Snowy Plovers and other shorebirds. The US Fish & Wildlife Service, in its Snowy Plover Recovery Plan (pp. 43/44), has identified Crissy Field as a potential expansion site for Snowy Plovers. (USFWS, Recovery Plan for the Western Snowy Plover, at 43-44). Given this anticipated increase in snowy plover population, using the Central Beach as a ROLA will create a high probability of future conflicting beach uses. There is no question that off-leash dogs have a substantial impact on the habitat and wildlife that use the beach.

Moreover, historical use at Central Beach has demonstrated that off-leash activities on Central Beach inevitably lead to off-leash dog disturbances within the WPA. Given that even within the WPA, dog owners have failed to comply with leash requirements almost 66% of the time, despite years of publicity, education, signage and a fence asking dog walkers to put their dogs on leash in the WPA. The DEIS does not contain any evidence- that dog owners will start complying with the new regulations and respect the WPA.

Finally, to the extent that NPS ultimately elects to allow off-leash activities at Central Beach, Golden Gate Audubon recommends (1) that the off-leash area be enclosed by fencing to clearly demarcate the boundaries of the ROLA. (2) that the ROLA be decreased in size to provide adequate buffer zones in relation to the WPA to the west and to the lagoon inlet to the east, and (3) that the Park Service invest in significant education efforts, followed by rigorous enforcement to undo the culture of noncompliance that exists at Crissy Field. 6. GGAS endorses the Preferred Alternative for the trails and grassy areas near East Beach. GGAS endorses the Preferred Alternative to allow on-leash dog activity in these areas as indicated by Map 10P in the DEIS with one caveat: the fresh water swale just east of the lagoon should be identified on the map and marked as a "no dog" area.

C. Fort Point Promenade/Fort Point NHS Trails GGAS endorses the

Preferred Alternative as identified by Map 11P of the DEIS. We note some concern for permitting large number of dogs (more than 3) on the relatively narrow paths in this area and reiterate our position that dog walkers should be limited to a maximum of three dogs per person within the GGNRA.

D. Baker Beach and Bluffs to Golden Gate Bridge Golden Gate Audubon believes that the Preferred Alternative for Baker Beach is not a workable plan. While we support the upland elements of the Preferred Alternative, we have two concerns regarding the beach element of the plan. Firstly, as an area of freshwater flow into the ocean, the mouth of Lobos Creek is a sensitive wildlife area and is the most attractive area of use for birds along this beach. As such, it should be off-limits to dogs and buffered from off-leash dog activity. Secondly, we believe that designating an imaginary line in the sand to distinguish a no-dog area from a leash-only area is not an adequate means of communicating the rule to park users and compliance will be problematic. We believe that the most effective and enforceable choice would be to designate Baker Beach as a no-dog area.

However, should NPS proceed with implementing the Preferred Alternative; Golden Gate Audubon strongly recommends that NPS alter the configuration of the planned leash-only area to adequately protect the Lobos Creek zone. The leash-only area to be shifted to the North Beach as identified on Map 12.

E. Fort Miley Golden Gate Audubon endorses the Preferred Alternative.

F. Lands End Golden Gate Audubon endorses the Preferred Alternative for Lands End.

G. Sutro Heights Park Golden Gate Audubon endorses the Preferred Alternative for Sutro Heights Park as illustrated by Map 14-P. H. Ocean Beach 1. Dogs should be excluded from the Ocean Beach Snowy Plover Protection Area. Golden Gate Audubon endorses the Preferred Alternative to exclude dogs from the Snowy Plover Protection Area (SPPA) and to allow dogs only on-leash on the promenade. We recommend that the designation of Snowy Plover Protection Area be changed to Shorebird (or Wildlife) Protection Area, a term which will more aptly describe the need for year-round protection.

2. GGAS does not endorse the creation of a ROLA north of Stairwell 21. Golden Gate Audubon does not endorse the Preferred Alternative and instead recommends that the GGNRA not allow dogs on Ocean Beach at all. Given historic noncompliance with leash and off-leash regulations and the continuing impact to birds and other natural resources on the beach, dog-related recreation is not an appropriate activity on any beach within the

GGNRA.

GGAS acknowledges that given the extreme political pressures put on the Park Service, it is likely that it will elect to create the ROLA on Ocean Beach. Given that, GGAS strongly urges the Park Service to erect post and cable symbolic fencing with adequate signage along the south boundary of the ROLA from the seawall westward as far as is practical to ensure that dog owners and other visitors know they are entering a ROLA. GGAS also strongly encourages that the area be monitored by rangers given the high likelihood of continuing non-compliance with regulations in the area.

3. GGAS strongly supports the closure of Ocean Beach South of Sloat to dogs. Golden Gate Audubon strongly supports the Preferred Alternative to exclude dogs along Ocean Beach south of Sloat Avenue.

I. The Preferred Alternative Would Fail to Protect the Natural and Aesthetic Resources at Ft. Funston. 1. GGAS opposes the Preferred Alternative to establish a ROLA south of the beach access at Ft. Funston. Golden Gate Audubon strongly opposes the Preferred Alternative, which creates a ROLA south of the beach access. Given the historic noncompliance by dog owners at Ft. Funston and the sensitivity of the habitat, Golden Gate Audubon has concluded that dog related recreation on the Ft. Funston beach is not an appropriate use of the park land. Because dogs should not be accessing the beach at Ft. Funston, Golden Gate Audubon further recommends that NPS not allow dogs on the beach access trails. The presence of dogs on the beach at Ft. Funston will adversely impact shorebirds. Additionally, the presence of dogs on the beach at Ft. Funston will adversely impact park visitors, including equestrians, some of whom have suffered attacks from dogs when riding at or near Ft. Funston.

To the extent that NPS proceeds in allowing a ROLA at Ft. Funston, it must be fenced and fully marked to provide adequate notice to dog owners and other park users about where on- and off-leash dog activities are appropriate.

2. GGAS opposes permitting dog recreation south of the main parking lot. Dog-related recreation on the Ft. Funston beach is not an appropriate use of that park land. There is no need for dogs to be on the beach access trails, especially Sand Ladder Trail. GGAS recommends that this area be designated as a "no-dog" area.

3. GGAS does not oppose the creation of a ROLA north of the main parking lot provided it is fully enclosed. Golden Gate Audubon will not oppose the establishment of a ROLA north of the main lot at Ft. Funston provided (1) that the ROLA is not established on sensitive habitat, (2) that the ROLA is fully enclosed by fencing, and (3) that the ROLA and surrounding areas are

adequately patrolled and leash requirements are enforced.

V. CONCLUSION Thank you for your consideration of our comments. It is our hope that the FEIS will reflect a comprehensive analysis of the impacts that will occur under the selected alternatives and that active education and enforcement is part of ongoing management in the GGNRA for dogs. With a reasonable regulation and adequate enforcement, we believe the GGNRA can continue to accommodate dogs while protection the valuable natural and cultural resources that make the GGNRA an urban national treasure.

If you would like to discuss these issues further, please do not hesitate to contact me at mlynes@goldengateaudubon.org or at (510) 843-6551.

Thank you, Michael Lynes, Conservation Director

Correspondence ID: 4696 **Project:** 11759 **Document:** 38106
Received: Jun,09,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Superintendent Dean,

My name is Margaret Bradley, I am a married mother of two young children. We are an outdoors family. We love to hike, bike ,camp, surf and travel. We are active members of the Sierra Club and the Surfrider foundation. We have traveled to more than 50 countries. San Francisco is the best place in the world. One member of our family is our dog Maya. We enjoy bringing her along on as many adventures as we can. We are very fortunate to call San Francisco home. I have always boasted about what an open and tolerant place San Francisco is. People are open and accepting of all types of people and life styles and there is little restriction towards others.

The human animal bond is very important to me. As a responsible dog guardian, I keep Maya under voice and sight control, clean up after her and keep her out of the fenced dunes and vegetative areas. It is important for my dog walking friends and me that areas like Fort Funston remain open for off leash dog walking access.

I do not agree with the GGNRA's current preferred alternative as it significantly restricts and eliminates off leash dog walking in many areas within the GGNRA. The proposed changes to the existing conditions (1979 Pet Policy) and to the new lands in San Mateo County are not based upon sound science or long-term monitoring of site specific conditions.

As presented in the DEIS, the proposed dog management plan eliminates

dog-walking (on and off leash) access for all new lands (additions to the GGNRA sometime in the future) within San Mateo county lands. The GGNRA's mission applies equally to new lands as existing lands and it is essential for the GGNRA to consider reasonable and balanced alternatives for dog walking on new lands.

I am concerned about the long-term preservation of the GGNRA's natural resources and want to protect these important natural areas, but other options (besides restricting dogwalking access) should be considered first. For example, it is not clear where dogs are allowed. I think the GGNRA should provide better signage and create environmental barriers, such as the vegetative barriers surrounding the tidal marsh at Crissy Field or the restored dunes at Fort Funston. As a responsible dog guardian and advocate for animals, I know it is crucial that our dogs are well behaved and trained in order to peacefully co-exist in an urban environment and adequate exercise and socialization is essential for a well-behaved dog. Having places where I can take long walks with Maya which allows me to get the exercise I need while also meeting Maya's needs. Without access to the small amount of land in the GGNRA we currently have, I am very concerned that many dog and dog guardians will not have sufficient opportunity to exercise and recreate. I live in the Sunset and take Maya to Fort Funston daily. I refer to it as our "happy place". I can enjoy the beauty and she can exercise and play with other dogs.

Some areas within the GGNRA also serve as a place of solitude for me and provide me with a very important peace and safe outdoor space and experience within the San Francisco Bay Area, a large metropolitan area.

Some specific problems with the DEIS include the following points. Please revise the DEIS to correct these errors.

This DEIS and Plan doesn't recognize that environmental values include both recreation and nature. In many places, the LEIS treats the environment and recreation as opposing values, i.e., that recreation only harms natural resources. The document doesn't acknowledge that people care about both and that people with dogs are often also good stewards of our environment.

The draft plan has the effect of punishing many people because a very small number are uneducated, insensitive, or irresponsible and because the current signage of off leash areas is unclear. The reasonable response to this problem is to educate visitors, improve signage and help park visitors follow the rules and learn how to respect the environment, not to ban the rest of us with dogs from the GGNRA. I wish that the DEIS would include an alternative along these lines.

The proposed "compliance-based" approach should be modified to create a

baseline of current conditions, then measure impacts rather than compliance. It should include a robust public educational component and an objective, long-term monitoring program designed and carried out with the community. The GGNRA should develop partnerships with community, animal welfare, and conservation organizations to make this work. These partner groups could bring additional resources to limited federal resources. GGNRA should be a partner with the City of San Francisco and other communities, not an adversary.

The DEIS doesn't recognize that many areas of the GGNRA are located in or next to urban neighborhoods. The DEIS excludes the quality of the urban environment from its scope, saying it's not significant. The reality is that the GGNRA provides much needed open space in a major urban area. This omission is disconcerting because the fundamental purpose of creating the GGNRA was to provide open space for recreation (including dog walking as a form of recreation) to serve the metropolitan Bay Area. The dynamic interrelationship between GGNRA and our neighborhoods is exactly the human environment that the EIS is required to study, but failed to do so.

The DEIS notes some studies and general tendencies of dogs to harm natural resources, but with few exceptions, there is little documented site-specific impacts to support the restrictions of the preferred alternatives. Further, there is insufficient documentation that considers other impacts - other park visitors that disturb and impair the natural resources, other wildlife, Mother Nature, boot camps, bicyclists, huge crowd attracting events such as Fleet Week, festivals and Walk-a-thons. The proposed broad limitations in the DEIS are without site-specific science that demonstrates that problems with the quality of GGNRA's natural resources are actually attributable to dogs and not to other factors.

The DEIS needs to provide full disclosure to the public and decision makers. If dog-related disturbances are having a significant negative effect on wildlife, for example, the DEIS needs to provide site-specific scientific evidence as documentation and undertake a scientific evaluation as to whether people or other factors are also causing or contributing to the problem. If they are, GGNRA needs to provide an analysis that considers whether people should also be restricted from these areas. We need this documentation in order to comment meaningfully on the draft plan and DEIS. The science needs to be sound and the consequences need to be fully and fairly disclosed for everyone - so that an informed decision can be made.

And lastly, after much consideration, I support Alternative A, the No Action alternative and would also include the "New Lands" areas (such as Cattle Hill, Sweeny Ridge, Mori Point, Pedro Point and Milagra Ridge and Rancho

Corral de Tierra) in Sari Mateo county.

The DEIS is biased against and does not take a hard look at the No Action alternative or variations on that alternative. There are many areas in the GGNRA where the existing 1979 Pet Policy has been working, and where sensitive species are not present and visitor conflicts do not occur or are very infrequent. In addition, the DEIS does not provide site specific information that these areas are inappropriate for continued dog walking.

Respectfully, Margaret Bradley

Correspondence ID: 4697 **Project:** 11759 **Document:** 38106
Received: Jun,02,2011 00:00:00
Correspondence Type: Letter
Correspondence: JOHN B. KEATING ATTORNEY AT LAW WOODSIDE, CALIFORNIA 94062 May 28, 2011

Mr. Frank Dean Park Superintendent Golden Gate National Recreation Area
Building 201, Fort Mason Bay and Franklin Streets San Francisco, CA
94123-0022

Re: Golden Gate National Recreation Area Pet Management DEIS Public Comment

Dear Superintendent Dean:

I am submitting documents for inclusion in the DEIS public comment review, as set forth in the table below. The documents and comment overwhelming establish the following central factors for DEIS consideration: ? Any further restriction of off leash recreational access will create significant adverse and highly controversial impact on recreational access and is inconsistent with fulfillment of the GGNRA urban recreation area mandate; ? The preferred alternative simply will not work in that concentrating the off leash use in a smaller area will create conflict problems, is unenforceable and is far too expensive; ? The DEIS fails to adequately consider the full impact of the preferred alternative on park users, on GGNRA park quality and management factors and on San Francisco municipal parks ' the DEIS fails to adequately consider where the current park users will end up after they are displaced, and where to find the best locations for the use or if the migration of the park users will cause environmental impact at areas to which the users are displaced; ? The compliance based management aspect improperly subverts the future rights of the people to public comment rulemaking prior to such changes; and ? The better solution by far is to take no action other than to confirm

continued management consistent with the long standing off leash policy.
Document Submission:

Each of the documents is appropriate for consideration in the context of the specific questions presented by the DEIS. Tabs 1-12 consist of excerpts from transcripts of prior public testimony before the Advisory Commission concerning the wisdom of potential modification of the Pet Policy. This testimony generally concerns the views of members of the public seeking to provide official comment to the NPS on the overall issue addressed in the DEIS concerning pet management in the GGNRA, the historical pattern of successful pet management under the GGNRA's long standing Pet Policy, the context of the new change to that pet management practice, the central issue of the baseline status on which the DEIS and potential rulemaking should be considered, and the unique aspects of Fort Funston and other particular areas warranting continuation as off-leash areas. The testimony was prior official public comment on the issue that has largely been ignored and sidestepped, requiring consideration at this point to avoid impropriety in the DEIS and potential rulemaking process.

Tab 13 contains copies of some of my prior correspondence to the Park Service concerning the pet management policy and rulemaking process, and the question of the appropriate baseline status from which the rulemaking and environmental analysis should proceed. These documents are appropriate for consideration in the DEIS process because they go both to the general issues of pet management in the GGNRA and the specific management of off leash access areas at Fort Funston. The documents also provide analysis of the historical treatment of recreational access, the enabling statute mandate, the pattern of prior off leash access, the promises made that off leash access would continue and specific analysis of the presumptions on which the closures and access changes are proposed. The correspondence in part addresses the prior failure to fully consider the points raised in the rulemaking submissions and the need for such analysis in a fair and unbiased way in making a determination of appropriate scope of recreational access consistent with the enabling statute.

TAB DOCUMENT DESCRIPTION 1. Transcript of testimony at Advisory Commission ' August 2000 Re: Fort Funston Closure Notice Staff Presentation 121 Public Comment: 128 Rolland Mathers 129 Dan Brown 132 John Cranshaw 134 Christy Cameron 137 Laura Cavaluzzo 139 Linda Shore 142 Jane Shepard 145 Vicki Tiernan 146 Florence Sarrett 149 Lydia Bosch, Esq. 150 TAB DOCUMENT DESCRIPTION Jeffrey Ward 153 Jennifer Finlay 156 Denise Selleck 157 Bozia Family 159 Gareth Bozia 160 Angelo Bozia 160 Sheila Mahoney 161 Joseph Stroman 162 Deni Asnis 163 Chay Gordon 165 Ed Sayres 167 George Paphitis, M. D. 168 Avram Shepard 170 Renee Pittin 175 Patrick Noakes 179 Claudia Kwoczynska 180 Steven Krefting 185 Mort Ginsberg 188 Francine Podenski 191 Karen Hu,

Ph.d 193 John Keating 195 Lisa Vittori 197 Valerie Hancock 200 Lana Bajsel 202

2. Transcript of testimony at Advisory Commission ' September 2000 Public Comment -- Previously Scheduled Speakers on Fort Funston Closure Eric Finseth, Esq. 13 Joy Durighello 16 Patricia La Cava 18 TAB DOCUMENT DESCRIPTION 3. Transcript of testimony at Advisory Commission ' November 2000 Re: Fort Funston Closure Notice 7 First Resolution 12 Motion: 20 Carried: 29 Commissioner Kernan's Motion 43 Motion: 43 Carried: 44 Commissioner Meyer's motion to rescind the Pet Policy 29 Avrum Shepard 38 John Keating 40 Motion ruled improper 42 Lisa Vittori 93 4. Transcript of testimony at Advisory Commission ' January 2001 Proposal to Rescind 1979 Commission Pet Policy Chairman Bartke's Comments 12 Public Comment: Gavin Newsom, Supervisor, Board of Supervisors, City and County of San Francisco 20 William Saunders 26 Tony Hall, Supervisor, Board of Supervisors, City and County of San Francisco 27 Barbara Nanney representing Senator Jackie Speier California State Senate 29 Susan Walsh representing Assemblyman Kevin Shelley California State Assembly 32 Jake McGoldrick, Supervisor, Board of Supervisors, City and County of San Francisco 33 Tom Ammiano, President, Board of Supervisors, City and County of San Francisco 36 Aaron Peskin, Supervisor, Board of Supervisors, City and County of San Francisco 38 Ed Sayers, President, San Francisco SPCA 46 Leland Yee, Supervisor, Board of Supervisors, City and County of San Francisco 53 Joan Booth 56 Crissy Field Dog Group Martha Walters 59 Crissy Field Dog Group Mark Leno 61 Supervisor, Board of Supervisors, City and County of San Francisco TAB DOCUMENT DESCRIPTION Jennifer Schwinn, Esq. 65 Chris Griffin, Esq. 66 Representing Crissy Field Dog Owners Group Anne Farrow, 69 Co-Chair San Francisco Dog Owners Group Karin Hu, Ph. D. 70 Wendy McClure, 73 Co-Chair San Francisco Dog Owners Group Linda McKay, 75 Chair Fort Funston Dog Walkers Gerardo Sandoval, 76 Supervisor, Board of Supervisors, City and County of San Francisco Laura Cavaluzzo 78 Kathy Roth, M. D. 81 Lydia Boesch, Esq. . 82 Margory Cohen 86 Greg Hurline 87 Richard Schulke, 91 Chairman Animal Control and Welfare Commission, City and County of San Francisco Misha Weidman, Esq. 93 Linda Horning 97 Mildred Bollin 99 Christy Cameron, Esq. 101 Francine Podenski 102 Gary S. Fergus, Esq. 106 Louis Gwerder, III 109 Brian Irian, Esq. 110 Sheila Mahoney 113 Cindy Del Corto 114 Pamela Baldwin 115 Chairman Bartke's Motion 121 Lynne Newhouse Segal, J. D., Commissioner Recreation and Park Commission City and County of San Francisco 122 Charles Bonny 125 Jamie Hoff 127 Lisa Vittori 129 Andre Armand 130 Carol Arnold 132 Norman Buten 133 Jack Keating, Esq. 134 Christine L. Garcia, Esq 137

TAB DOCUMENT DESCRIPTION Commission Discussion 137 Revised Motion 154 Motion: 154 Carried: 155 Commissioner Wayburn's Motion

156 Commissioner Alexander's Motion to Postpone 157 Commissioner Bennett's Motion to Postpone Motion: 158 Carried: 159

5. Transcript of testimony at Advisory Commission ' April 2001 Re: Public Comment (Off-Leash Dog Issue) 107 John Keating, Esq. 107 Lisa Vittori 123 Vicki Tiernan 129 Michael Goldstein 131 Superintendent's Report 152

6. Transcript of testimony at Advisory Commission ' July 2001 Re: Park Pet Policy 92 Lisa Vittori 92 Michael Goldstein 94 John Keating, Esq. 97

7. Transcript of testimony at Advisory Commission ' August 2001 Michael Goldstein 100

8. Transcript of testimony at Advisory Commission ' October 2001 Will Anzenberger, Director Law and Advocacy, SF SPCA 64 John Keating, Esq. 66 Lisa Vittori 71 Steve Cockrell 73

9. Transcript of testimony at Advisory Commission ' November 2001 Michael Goldstein 116 Bill Huff 121 Martin Fieldhouse 123 Jane Feder 131 Linda McKay 132 Keith McAllister 134 Karen Hu 135 Vicki Tiernan 138 Carol Arnold 139 Florence Sarrett 142 TAB DOCUMENT DESCRIPTION Renee Pitten 149 Jennifer Finlay 150 David Mann 152 Jackie Johnson 155 Denise Selleck 157 David Emerick 159 Greg Herlein 160 Tom Larson 166 Avrum Sheppard 169 Sheila Mahoney 171 Colby Watts 173 Joe Hague 177 Ann Farrow 179 Francine Podenski 179 Lisa Vittori 180 John Keating 182

10. Transcript of testimony at Advisory Commission ' January 2002 Re: Non-Agenda Issues 8 Mark Zier 9 Vicki Tiernan 10 Margery Cohen 11 Carol Arnold 13 Jackie Johnson 14 Lisa Vittori 15

11. Transcript of testimony at Advisory Commission ' February 2002 Carsten Allen 7 Ken Ayers 10 Michael Goldstein 15 Steve Cockrell 17 John Keating 20

12. Transcript of testimony at Advisory Commission ' March 2002 John Keating, Esq. 33 TAB DOCUMENT DESCRIPTION

13. Prior Public Comment Submissions:

* 1/23/01 correspondence of John Keating to Superintendent O'Neill seeking reconsideration of the Fort Funston closure decision.

* 2/15/01 correspondence of John Keating to Secretary Norton * 4/6/01 correspondence of John Keating to Secretary Norton

- * 5/10/01 correspondence of John Keating to Secretary Norton
- * 7/3/01 correspondence of John Keating to Superintendent O'Neill
- * 11/9/01 correspondence of John Keating to OMB Administrator John J. Graham regarding changes in pet management and the ANPR., including attached Exhibits A,K
- * 4/12/02 John Keating ANPR public comment

I also seek to incorporate by reference and request consideration of Volume II through Volume VII of the public comment correspondence documents appended to my April 12, 2002 comment on the proposed ANPR process which laid the ground for the current DEIS consideration. Such public comment letters and petitions are appropriate for consideration in that they concern the same issue and were submitted in response to Park Service solicitation for comment in an earlier stage of this process. It is improper to solicit such comment, then largely ignore the specific comments. At the minimum, to avoid divesting the people of the public comment right, it is proper to consider the comments at this stage.

Volume II Tab 12 of the prior submission contained originals of hundreds of detailed and specific comments made by the public regarding pet management and the scope of recreational access at Fort Funston. Particularly, these comments go to the unique high quality social community atmosphere provided by this park area by virtue of the practice of allowing off leash dog walking. A number of these comments evidence the important issue of the unusual degree to which this distinct park area provides an unsurpassed opportunity and attraction to participation by senior, disabled, minority and urban user communities otherwise generally under served by the National Park Service.

Volume II Tabs 13-16 evidenced petitions to the NPS signed by many thousands regarding the issues to be considered by the DEIS when similarly presented by the ANPR.

Volumes III through V (Tabs 17 through 22) contained copies of additional letters regarding the ANPR pet management issues. The originals of these letters were previously sent directly to the National Park Service and/or Department of Interior in response to the initial announcements that an ANPR would be pursued and addressed the current pet management practices issues.

Please also consider Volume VI through VII (Tabs 23 and 24) of the prior submission which contained copies of written ANPR letters and e-mails collected for submission together in bulk and number stamped for ease of

reference by the Park Service during review, and which present public comment on the same issues as are presented by the DEIS. The additional relevant documents assembled in my prior April 12, 2002 submission and incorporated as part of my current comment on the DEIS are described in greater detail as follows:

12 Originals of comment statements by users of Fort Funston regarding views and desires concerning pet management and recreational access closures (March 2000)

13 January 2001 internet petition responding to GGNRA proposal to rescind the Pet Policy, asking for exemption and reconsideration of potential application of general regulation and based on prior assurances from the Park Service that off lead dog walking would not be curtailed supports continuing off lead recreation and lists specific areas currently enjoyed by the signers as off lead areas. (This tab contains a print out from the web site of electronic signatures 01-695 and 4609-5308.)

14. January 2001 internet petition full data print out of the first 5967 signatures and comments

15. Pages from Fort Funston Fall 2000 petition signed by thousands objecting to Fort Funston closure as unnecessary and unreasonably curtailing off lead recreation. The full record of petition signatures was previously submitted to the Park Service and is incorporated by reference for submission as comment in this ANPR consideration.

16. Spring 2002 off lead petition ' print out from petition web site of first and last 225 of 4125 signers on internet petition ' submitted for purposes of allowing Park Service verification of authenticity of full data and excerpted comments being concurrently submitted by the Fort Funston Dog Walkers group.

17. Copies of August 3, 2001 letters previously forwarded to Secretary Norton and Director Mainella and bearing individual comments concerning the changes in pet management in the GGNRA.

18. Copies of additional second set of August 3, 2001 letters previously forwarded to Secretary Norton and Director Mainella asserting that the changes restricting pet recreation in the GGNRA are important to the sender and should not be made without full and fair public hearing.

19. Copies of additional third set of August 3, 2001 letters previously forwarded to Secretary Norton and Director Mainella decrying the deviation from the congressional intent in creating a recreation area by overly emphasizing wildlife enhancement at the expense of recreation, decrying the

process by which the Park Service manipulated the circumstances to deprive the public of a fair hearing and decrying the circumstances of bias of the Park Service employees who continue to be involved in railroading through anti recreation restrictions. 20. Copies of an additional fourth set of August 3, 2001 letters previously forwarded to Secretary Norton calling for compliance with promises made to local governments, calling for compliance with the enabling statute mandate and complaining about the lack of fair process before making dramatic changes restricting pet recreation in the GGNRA.

21. Copies of September 9, 2001 letters previously forwarded to Secretary Norton and Director Mainella and bearing individual comments concerning the changes in pet management in the GGNRA.

22. Copies of September 16, 2001 letters previously forwarded to Secretary Norton and Director Mainella and bearing individual comments concerning the changes in pet management in the GGNRA.

23. Copies of letters, faxes and e-mails received by FFDW and SFDOG for inclusion for consideration in the ANPR, some of which were separately received by the GGNRA and some of which have been forwarded to the user groups to be submitted in mass. Number stamped submissions 10001-10368 and 4/11/02 letter of Christy A. Cameron are included in this tab.

24. Copies of additional letters, faxes and e-mails received by FFDW and SFDOG for inclusion for consideration in the ANPR, some of which were separately received by the GGNRA and some of which have been forwarded to the user groups to be submitted in mass. Number stamped submissions 10401-10821 and 4/12/02 letter of Mildred M. Bolin are included in this tab.

These public comment petitions and letters reflect the broad importance the public gives to the need to form some mechanism to continue allowing off leash dog walking and to insure that the analysis be performed from a fair perspective and in an unbiased manner. If the GGNRA is unable to retrieve the prior comments as appended to my April 12, 2002 submission, kindly advise me as I am willing to scan in and provide either hard copies or a digital copy of the public comment letters.

The Improper Process:

I continue to object to the DEIS process (1) to the extent it is being substituted for the public input comment opportunity required pursuant to 36 CFR 1.5 prior to changing the longstanding GGNRA Pet Policy allowing off leash recreational access, (2) to the extent that it presents a question for comment based on an analysis platform that is inconsistent with the enabling statute recreation mandate and fair evaluation of the proposed

change to the status quo, (3) to the extent that the DEIS document is so incomplete, biased, factually inaccurate, based on ill founded presumptions and limited in scope of areas considered as to unfairly prejudice and limit rather than facilitate full analysis of the pet management question, and (4) to the extent the compliance based management aspect of the plan has the effect of defeating the future right to public comment opportunity pursuant to 36 CFR 1.5.

The public comment on any proposed rule must include a public hearing where oral comments may be presented. Seeing people's faces and hearing the emotion in their voices as they speak on a subject that will have a tremendous impact on an important part of their lives is an important part of democracy. Resolution of this issue is necessary for meaningful public comment at the scoping stage in order to allow informed comment. The process violates 36 CFR 1.5 if there is not public comment on a proposed rule and the current scoping stage process is not procedurally sufficient to satisfy 36 CFR 1.5 requirements.

As part of the current scoping process the GGNRA needs to review and consider all the prior public comment solicited regarding the potential of change to the existing pet management policy, including during the Advanced Notice of Proposed Rulemaking process and the Advisory Committee public hearing on the issue in January 2001.

The GGNRA should consider the massive public comment in response to its prior solicitation for comment on the issue. Fair evaluation of the comment of the will of the people would compel provision of some off-leash areas. Yet, there is a risk that the GGNRA will use the DEIS process to ignore the comment. It would be improper sidestepping of the rulemaking requirements if despite the overwhelming public input, a new decision is made not based on the public input but instead based on back room analysis based on subjective presumption of environmental impact. The GGNRA previously held a public hearing on the issue and after starting to receive the testimony postponed receipt of the remainder of the oral public comment. The GGNRA should entertain all of the postponed public oral comment.

The GGNRA should take wide open public comment when the proposed rule is finally issued after considering the public input as to the DEIS. And, this public comment should be not just whether the public likes the preferred alternative, but rather whether to change from the 1979 Pet Policy to the new proposed rule.

The process is arbitrary and capricious to the extent not allowing consideration of whether off leash recreation can be accommodated in other areas of the GGNRA. Historically, the GGNRA dog management policy analysis has been a comparative analysis of impact of the use in one area as

opposed to potential impact of the same use in alternate areas. It is arbitrary and capricious to shift from a comparative analysis to an analysis of impact of specific areas in the abstract.

In creating the 1979 pet policy, the NPS carefully considered where off leash recreational use could best be accommodated within the GGNRA with the least adverse environmental impact and the least adverse impact on other recreational uses. Any proper analysis 32 years later of the impact of proposed deviation from the prior 1979 analysis conclusions must consider whether the environmental and social circumstances are unchanged such that the designated areas still have the least potential impact of all areas in the GGNRA or whether the recreational use might be relocated to other areas.

Negotiated rulemaking protocols generally call for considering all potential solutions and allowing the public process to paint on a fresh canvas. Although the NPS received objections to the negotiated rulemaking process proceeding based on constrained options, the NPS went forward with the drastically curtailed approach precluding full consideration of the relevant factors. Reliance of such an approach in the face of notice of the clear insufficiency of the approach is arbitrary and capricious and does not satisfy the 36 CFR 1.5 rulemaking requirements. The same procedural impropriety is employed in the current management plan alternatives in the DEIS.

The DEIS process is arbitrary and capricious in deviating from prior analysis and process, requiring clarification before scoping is completed.

(A) The Crissy Field development plan was based on a finding of no significant impact based on an assumption that the additional off leash areas then existing in the dog management plan were to be continued. If the assumption on which the Crissy Field development FONSI relied is arbitrarily removed, or retroactively determined to be false as implied by the DEIS, it is arbitrary and capricious to proceed inconsistently overruling the prior finding without analysis.

(B) After the issuance of the rulemaking on the Fort Funston closure, recreational users requested reconsideration of the ruling. Some of the requests for reconsideration received no response, and therefore are still pending. Director Mainella's eventual response to one of the requests for reconsideration included a promise that the scope of the dog walking at the closed areas would be part of the subject matter considered in the later planned consideration of overall dog walking management in the GGNRA. Director Mainella was correct in concluding that the traditional dog walking use of those areas is indeed a proper subject of consideration concerning the overall dog walking management plan. Recreational users had a right to rely on the representations of the Director. It is arbitrary and capricious to

preclude consideration of those areas in the current DEIS.

(C) It is arbitrary and capricious to fail to consider the social and environmental impact of the creeping closures of dog walking areas initially allowed in the 1979 Pet Policy. Closures of those areas have significant impact on the important impact factor of the concentration of the recreational use in limited areas. Offsetting mitigation replacement areas should be considered as part of any impact analysis, as should the impact of the closures.

The preferred alternative plan adopts an improper hostile compliance based management scheme calling for further limitation if there is not 75% compliance with the change. In essence, the plan replaces the requirement of future rulemaking over any significant change with a plan allowing the GGNRA to make future changes administratively. That switched procedure violates the rulemaking requirement.

Moreover, the plan provides only for adjustment downward, rather than reevaluation as to what best remedies the problem. Hence, the GGNRA is restricting park access to such an extent that the plan is unlikely to work, but if the current plan does not work then will restrict more rather than reevaluate to come up with a new plan. True reevaluation could result in a conclusion that the restrictions don't work and should be loosened rather than tightened. This is sort of like drastically reducing school class size together with a plan that if that doesn't work the class size will be reduced even further, without any consideration of whether a better change might be to increase class size. The DEIS statement is materially false and misleading in mischaracterizing the status of the existing dog management plan. The 1979 Pet Policy was officially ratified and adopted by the GGNRA. Although the DEIS reports that it was later determined that the 1979 Pet Policy was illegal, that is incorrect. That was simply an interpretation posture taken by the solicitor in the course of litigation. That interpretation was rejected by the Court at least twice and held not to be a basis for not continuing to apply the 1979 Pet Policy.

The NPS has received objection and comment repeatedly that it is arbitrary and capricious to move forward with the rulemaking process based on promoting a self serving legal analysis that has previously been ruled against by the Court. Such conduct is misleading to the public. The DEIS is also false and potentially deliberately misleading in suggesting that the Citizen Advisory Commission acknowledged that the policy was illegal and unenforceable. The transcript shows that to be a position taken by one commissioner based on the incorrect legal analysis provided by the NPS. The opposite approach was taken in the motion passed by the Commission ' to take no action on the earlier proposal to rescind the policy as illegal and

invalid.

The DEIS stands the traditional impact analysis requirement on its head in that the DEIS improperly uses impact analysis as a sword to promote deviation from the status quo rather than its traditional function of evaluating the risk of negative impact of a change from the status quo.. It is improper to undermine the court's ruling by requiring environmental analysis even if the GGNRA simply keeps the existing off leash policy. Environmental analysis is only required to the extent some new rule deviates from the current pet policy, and is not required if there is no change.

Similarly, it is improper if the GGNRA reverses the intent of the rulemaking process. There currently is a valid pet management policy allowing off leash dog walking. It would be an improper attempt to sidestep the court's decision if the GGNRA is attempting to say that off leash can remain only if a special regulation is adopted. Rulemaking and environmental analysis is improper and deviates from the controlling law to the extent it is set up to create a new policy from scratch in place of the conducting the required public input rulemaking process on whether to alter the 1979 Pet Policy.

The DEIS scope of discussion should include all areas of the GGNRA. Artificial constraints on the scope of discussion of alternatives are against the public policy of allowing the full consideration of all possibilities in order to balance factors and give the best recommendation.

The scope of the discussion must include all areas designated as off leash under the 1979 Pet Policy. That policy was created after public input hearings and considerations and ultimately designated certain areas for off leash recreation where it was determined that there would be no adverse impact on the environment or other access interests. The Federal Court decision held that the 1979 Pet Policy determination can not be changed without compliance with the public comment rulemaking procedure requirement of 36 CFR 1.5. Any restriction of the scope of discussion such as to preclude consideration of off leash in areas allowed pursuant to the 1979 Pet Policy would lack compliance with the court decision and any resulting proposed rulemaking change would be in contempt of the court. The reality is that for decades pet management in the GGNRA was conducted pursuant to an official Pet Policy that was adopted and implemented by the agency after public input and hearings. The approved policy interpreted and applied the general Park Service wide regulations in the context of the unique circumstances of the recreation area -- an enabling statute mandate to facilitate traditional urban open space recreational access, promises made to the people of the City of San Francisco that the traditional recreational activities would be allowed to continue, a dense urban area and

long preexisting recreational use.

Fair consideration of the off leash issue needs to take into account the reality that the Park Service is seeking to make a significant change to eliminate a current use that is extremely popular. A public input process is required prior to any such highly controversial and significant alteration in the public use pattern of the park areas (36 CFR 1.5). It is unfair for the Park Service to manipulate the presentation so as to evaluate the question as if it were to create an entirely new use.

Additionally, the DEIS document contains posturing, one sided presentation and factual inaccuracies that make the document skewed against resolution in favor of allowing off leash dog walking. Previously, the federal court found that the local park service employees had attempted to railroad through a closure while soliciting one-sided input against off leash recreation and sidetracking consideration of input from dog walkers. In my view, the biased DEIS presentation and the history of action against off leash recreation warrants careful attention to ensuring that the analysis of the options is fairly considered. Those shown to be biased before should not be involved currently.

The general Park Service leash law regulation is not controlling. The pet activity guidelines of 36 CFR 2.15(a)(2) should not be construed as a universal leash law within the confines of the GGNRA. The 1979 Pet Policy as amended and tinkered with and applied up through at least 1999 is a more appropriate application of 36 CFR 2.15(a)(2) together with the enabling statute mandate and management discretion. The Dog Policy brochure previously circulated by the GGNRA is the policy that should be operative. As I do not believe that the long-standing GGNRA Pet Policy has been legally abrogated, I do not believe it is appropriate to assume that a "leash law" is currently in effect. To the extent the DRO-55 and 2001 Management Policies guidelines are construed to interpret the general regulations to strictly apply universally despite a contrary recreation area enabling statute unless a particular recreation activity is specified the new interpretation runs counter to the congressional intent in creating this specific GGNRA recreation area. By improperly construing a general regulation in such a manner as to negate the language of a specific statute the new interpretation of the regulation is illegal as applied to the GGNRA. The Park Service should not continue to go down the path of interpreting its regulations in such an extreme fashion as to render it incompetent to manage a recreation area.

The GGNRA emphasizes "management options . . . consistent with protecting national park resources and assuring visitor safety." That articulation is improper and skews the question in that it ignores the second half of the enabling statute mandate -- maintaining open space recreation

opportunities. The DEIS should properly also highlight the additional language "in a manner which will provide for recreation and educational opportunities" or the language "in order to provide for the maintenance of needed recreational open space," as the park purpose is specified in the enabling statute. (16 U.S.C. 460bb) Comments Concerning Specific Areas:

The general regulation should be adjusted to designate former "voice control" areas for off leash dog walking. At the minimum, the general regulation interpretation should be altered to allow such discretion to superintendents at least in circumstances of recreation areas where off leash recreation has been traditionally allowed. Limitation of the discretion to recreation areas where the discretion is warranted under an equitable grand fathering concept would ease the concern of potential system wide precedent.

All areas identified in the GGNRA Pet Policy brochure as existing in early 2000 as off leash areas should remain off leash. To the extent any of those areas are deemed currently closed to dogs, they should be opened. The Crissy Field beach area between the Coast Guard pier and the rock area that is the current boundary for dog use should be reopened to dogs consistent with the Mitigation Matrix of the Crissy Field NSI finding.

The closure areas at Fort Funston should be reopened for user access including dog walking access absent a well founded showing of significant adverse environmental impact. The traditional off leash area on the Lands End road and path leading along the coastal cliffs should be reopened, subject to closure of certain areas away from the roadway in the event of a well founded showing of adverse environmental impact. The Ocean Beach off leash restrictions from Stairwell 21 to Sloat should be reexamined and remain restricted only if there is analysis showing a substantial basis to believe that the restriction will aid the Snowy Plover population. Any such restriction should be limited to the seasons when and areas where the Snowy Plovers are ordinarily present.

General Comments Concerning Management Changes:

The Park Service ought to decline to engage in further formal rulemaking and continue the status quo of the prior longstanding policy allowing off leash dog walking in certain areas previously determined to have the least potential resource impact.

As summarized below this option is the only reasonably economic and practical alternative, and clearly is the most consistent with the expression of public will. Pursuing a change of the current pet management practices would present uncertainty, create unnecessary expense and management difficulty, foment disharmony between park users and staff, and lead to

great enforcement problems and potential legal complications.

The prior longstanding GGNRA Pet Policy had been adopted after a series of public hearings in the late 1970's. It was a product of careful analysis and reasonable compromise balancing the various recreational and resource protection factors. With occasional adjustments the Pet Policy endured and worked well for decades. It was popular and appropriate in accommodating the preexisting recreational activities and unique circumstances of the park. And, there have been surprisingly few problems. People generally seem to learn how to coexist and work out their competing desires for recreational access. I observed an example of how giving a little freedom goes a long way in helping people to get along. It was a hot and crowded summer week day at Crissy Field ' East Beach. The place was already packed, adults, kids and dogs of all variety romping in the low waves, when four or five vans from a summer camp arrived. The director of the camp and I talked as he was standing at the top of the beach carefully watching his thirty or so children and numerous teenage staff. I asked why he chose this particular area that was so crowded and had so many off leash dogs. The adjoining beach area where dogs are completely banned was much less crowded. Wasn't he worried about conflict between the dogs and his kids? To my surprise he said that actually the presence of so many dogs was one of the main factors that attracted him to that particular beach. It turned out that many of his kids are inner city children without much opportunity for safe and friendly interaction in public areas. This camp director said one of his chief goals is to try to teach the kids how to meet, get along with and play freely with others. He said that the presence of the off leash dogs helps him by providing an opportunity not only to teach the kids how to interact with dogs but also how to quickly make friends and play freely.

On the other hand, the notion that the Park Service could attempt to completely eliminate off leash dog walking on the former San Francisco city beaches is a fantasy. The GGNRA simply does not have the personnel necessary to achieve such a wholesale change in the manner of usage of these popular beach areas. Previously when the GGNRA stated it was changing its policy to end dog walking, the new policy had been enforced only sporadically. On occasions when the Park Service has attempted to enforce the policy doing so has led to difficulties and poor public relations. Moreover, even were the Park Service able to repress the local popular desires to continue dog walking on the San Francisco city beaches, attempting to force the people away from that traditional source of recreational open space access would likely result in migration of dog walking park users from those areas of minimal impact into areas of more natural resource degradation risk.

As a frequent beach walker I have observed examples of such unexpected adverse impact following a unilateral change to longstanding practice.

Certain areas of Ocean Beach had been designated as off leash areas, and other portions designated as on leash where the Park Service had identified a need to avoid the possibility of interaction with Snowy Plovers. There were clear signs at the beach with maps showing exactly where the off leash and on leash areas began and ended. By and large the public obeyed the restrictions. One could watch beach walkers routinely running and playing freely with their dogs off leash while carrying leashes and then stopping to clip on the leashes when getting into the restricted Snowy Plover area.

However, that cooperative compliance ended when the Park Service tore out those clear signs with the maps and replaced them with signs that instructed that dogs must be on leash at all times. As a result we had a situation where the public distrusted and ignored the signs completely and there is no information regarding the special area. I saw off leash dogs in the area where previously they would be leashed due to the identified special protection need. Hence, by adopting a nominal universal policy that is unenforceable and unpopular the Park Service actually had the opposite effect ' increasing the likelihood of off leash dogs in the identified natural resource risk area. If the Park Service cannot possibly achieve enforcement of an overall ban, it should not attempt a partial enforcement that will merely cause migration of park users from areas previously identified as appropriate due to their lower protection need into other areas that have a higher protection need. The unilateral change in policy was as unnecessary as it was improvident. For years the Park Service had interpreted its statutes and regulations such as to allow the recreation area discretion to make such activity accommodations as were generally necessary to fulfill its special urban recreational mandate. In late 2000 during the rush to quickly implement the stricter new management policies, the legal interpretation was flip flopped to suggest that there was no discretion unless the particular activity was specifically articulated in the enabling statute. In light of that changed interpretation local staff declared that the longstanding GGNRA Pet Policy was improper and therefore "void." The analysis for the first twenty years seems more well founded in that it recognized the statutory authority for discretion to make adjustments necessary to fulfill the enabling statute mandate. I think that the abrupt change in legal interpretation in 2000 wrongly resulted in retroactively overruling congressional intent by staff legal interpretation.

The documents produced by the GGNRA in litigation belie the GGNRA's posture denying the validity of the prior official policy allowing off leash dog walking. The GGNRA suggests that the prior policy was merely a recommendation that never was adopted and never went into effect. In fact, the 1979 Pet Policy had been created and approved after public hearings before the Advisory Commission and was thereafter adopted by the GGNRA and identified as its official policy.

The GGNRA Pet Policy allowing some off-leash dog walking remained the official policy for two decades. GGNRA and NPS officials repeatedly confirmed the Pet Policy from 1992,1999 in letters to inquiring members of Congress. Nevertheless, park officials seeking to rescind the Pet Policy without public hearings newly took the position that the Pet Policy was never officially adopted by the GGNRA.

Date: Page No.: D00246-247 Pet Policy as amended up through year 2000.

12/27/99 D00055-56 Acting Superintendent Scott letter to park user discussing the various off-leash areas at Crissy Field and referring to the "voice control policy."

8/18/99 D00011-12 Chief Ranger Yvette Ruan letter to a park user confirming in third paragraph that the GGNRA "has adopted a fairly liberal pet policy that allows the opportunity for visitors to enjoy several designated areas where pets may be off-leash if under voice control."

3/19/99 D01367-70 Superintendent O'Neill letter to Congresswoman Pelosi confirming that the GGNRA had adopted the Pet Policy:

"As you are probably aware, GGNRA has adopted a pet policy that is more liberal than pet regulations at other national park sites throughout the country. In all other areas of the national park system, pets are required to be leashed at all times and are, for the most part, excluded from all but developed areas. GGNRA has, with the assistance of the park's Advisory Commission, established a pet policy that allows some opportunity for visitors to enjoy a few designated areas with their pets under less restrictive circumstances. Certain areas of the park have been designated as voice control areas where pets are permitted off-leash. Other sites are open only to leashed pets, and some portions of the park are completely closed to pets in order to protect sensitive resources. This policy is designed to accommodate the many different user groups within the park as well as to fulfill our mandate to protect natural resource values of the park. We believe our present policy provides a balance between pets in GGNRA and the protection of park resources."

Representative Nancy Pelosi's 3/10/99 inquiry correspondence to Brian O'Neill in the second paragraph had noted that the constituent has requested that "the agreements made previously with the Citizens Advisory Commission be reinstated and respected." The 11/29/98 Constituent correspondence triggering the response of Superintendent O'Neill to Congresswoman Pelosi at the fourth paragraph reflects a concern that the prior policy was being abrogated without public hearings.

2/5/99 D00045-50 Western Region Regional Director John A. Reynolds

letter to Senator Feinstein enclosing correspondence responding to her constituent and confirming that the GGNRA had adopted the Pet Policy and that the GGNRA did "not anticipate any change to GGNRA's pet regulations."

1998 D00248 GGNRA information release explaining that the GGNRA has "designated appropriate areas where dog walking can take place on- or off-leash without negatively impacting the resources or other uses."

12/30/97 D00293-4 Western Region Regional Director John A. Reynolds letter to Senator Feinstein again confirming that the GGNRA adopted the Pet Policy which it established with the assistance of the Advisory Commission (with circulation initials of Brian O'Neill) Date: Page No.:

10/2/96 D00039 Crissy Field Finding of No Significant Impact with a statement regarding off-leash dog use at page 39 that "NPS will enforce voice control and clean up requirements, and will monitor the results of these efforts. This information will be periodically re-evaluated and management adjustments made where necessary, bringing any proposed changes in off leash dog access to the Advisory Commission" and at page 42 concluding that "Proposed changes in off leash dog access will be brought to the attention of the Advisory Commission prior to taking action."
9/16/96 D00461-464 GGNRA question and answer pamphlet concerning locations where off-leash dog walking is allowed.

@1996 D00473-474 Snowy Plover protection area information pamphlet confirming off leash recreation was still allowed on Ocean Beach north of Stairwell 21 and south of Sloat.

7/8/96 D00513-527 Compendium Amendment pursuant to 36 CFR 7 designating and providing maps of specific areas where off leash recreational access is allowed.

1/4/96 D00555-6 South District Ranger James Milestone's Outline of "changes the new pet policy will have from the existing pet policy," the new policy including off-leash recreation and being incorporated by the GGNRA as a compendium amendment.

7/8/92 D00721-722 and 725-6 Letters of Western Region Regional Director Stanley T. Albright to Senators John Seymour and Alan Cranston confirming that as of 1992 "there is no change in the 1979 Pet Policy which provides the visitor the privilege of walking one's dog off leash."

2/24/79 D00479-482 "1979 Pet Policy" as initially adopted by Advisory Commission in September 1978 and accepted by the GGNRA Park

Superintendent in October 1978 and further approved in 1979.

The 1979 Pet Policy was adopted by the Advisory Commission with the specific rationale that the ordinary rules for National Parks are not appropriate for application to the unique circumstances of the urban recreation areas encompassed in the GGNRA. The Pet Policy was consistent and properly implements the specific unique statutory mandate for the GGNRA (16 USC 460 bb), and it is required that the unique statutory mandate for the recreation area controls over the general provisions otherwise applicable to all units of the National Park System. (16 USC 1c). The simplest and best way to resolve the Pet Management discussion would be to return to the analysis that concluded that the Pet Policy as adopted by the GGNRA and its Citizen Advisory Commission was legal and appropriate.

Sincerely, John B. Keating

Correspondence ID: 4698 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean,

Please include these two items (Marin County resolution for Muir Beach and Milagra Ridge Suggested Alternative) in the Crissy Field Dog Group letter to you dated May 27, 2011 in Appendix A.

In addition, please remove the Fort Funston Suggested Alternative in Appendix A of the May 27, 2011 CFDG letter and insert with this Fort Funston Preferred Alternative we are submitting.

CFDG will be submitting another letter regarding the Crissy Field Environmental Assessment. online by May 30, 2011.

We greatly appreciate the opportunity to comment on the GGNRA's draft EIS/draft Dog Management Plan.

Sincerely,

Martha Walters Chair, Crissy Field Dog Group

Cc: Cc: Sen. Diane Feinstein Rep. Nancy Pelosi Rep. Norm Dicks Rep. Doc Hastings Secretary Ken Salazar NPS Director Jon Jarvis

Mayor Ed Lee Supervisor Scott Wiener San Francisco SPCA Marin

Humane Society Peninsula Humane Society- SPCA

Enclosures: Marin County Resolution for Muir Beach Milagra Ridge
Suggested Alternative map Fort Funston Preferred Alternative

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

WHEREAS: 1 .The National Park Service (NPS) and Golden Gate National Recreation Area (GGNRA) recommend banning dogs from Muir Beach in Preferred Alternative D of the Dog Management Plan. 2. Preferred Alternative 0 would also eliminate dog access to the Coastal Fire Road and Trail adjacent to Muir Beach. 3. The community of Muir Beach was established as a residential community before stewardship of the NPS and has historically and safely allowed responsible off-leash dog use of its beach and surrounding trails.4. The GGNRA was mandated by Congress in 1972 to: "provide for the maintenance of needed recreational open space necessary for urban environment and planning", "to assure the preservation of open spaces" and "to provide public access along the waterfront and to expand the maximum extent possible the outdoor recreation opportunities available to the region. " 5. Preferred alternative 0 states that" off-leash dog walking can occur at a small beach area on county property adjacent to the NPS beach" (commonly known as "Little Beach"). Little Beach is not accessible without crossing the main beach or driving along neighborhood private roads. There is no public parking on Sunset Way or Pacific Way. These single lane local roads are fire lanes. Extra and illegally parked cars would create a hazard by blocking access to emergency vehicles. For those who would arrive on foot via the road, there are no amenities or services for Little Beach. No trash cans. No toilets. Most significantly allowing access only to Little Beach would endanger the health and safety of both humans and animals. Formally stating and implementing such a plan would require appropriate impact studies and input from the surrounding community, the Muir Beach Community Services District, and Muir Beach Volunteer Fire Department. 6. No evidence has been presented which indicates that use by dogs is more harmful to environmentally sensitive areas than use by people, it is unreasonable and invalid to restrict usage of Muir Beach and Coastal Trail to dog owners. 7. There is currently no continuous trail from Muir Beach to Mill Valley that allows access with a dog. 8. NPS proposes spending 900,000 dollars to enforce these preferred unprecedented dog management rules NOW, THEREFORE, BE IT RESOLVED 1. Muir Beach and the Coastal Trails must remain open (as outlined in Alternative A) for multi-use recreational activities for all residents of Marin and surrounding Bay Area counties. 2. In order to protect the newly restored Redwood Creek and lagoon areas with its sensitive habitat and wildlife, signage and

boundary markings must be made clear, understandable and visible. Specifically, a large sign at the footbridge entry to the beach must be added which clearly defines beach rules for all visitors. Additionally, signs and boundary markings must be placed at the lagoon and creek areas which forbid swimming, trampling on vegetation or disturbing wildlife in these areas. NPS must properly enforce rules for all visitors and impose appropriate fines. 3. As is the case in most dog-friendly parks, a dog litter bag dispenser and waste receptacle, along with a signage stating distinctly dog management rules must be placed in prominent locations to encourage responsible dog control and management. 4. Dog-access from Coyote Ridge Trail to Miwok Fire Road must be granted to allow hikers with dogs to cross from Muir Beach into Mill Valley.

ATTEST: Joan Burton Wynn Committee Chair

Dear Mr. Dean,

Thank you for the opportunity to comment on this important document, the Golden Gate National Recreation Area's (GGNRA) Draft Environmental Impact Statement/Draft Dog Management Plan (Draft Plan/DEIS).

Introduction

The Crissy Field Dog Group is a non-profit organization devoted to responsible off leash dog recreation in the San Francisco Bay area for over a decade. We have approximately 600 members distributed throughout California and many other states. We have worked with the GGNRA staff on off leash dog recreation issues throughout this entire period including as a member of the GGNRA Negotiated Rulemaking Committee for dog management. Our work has included working with the Golden Gate Audubon Society and the GGNRA staff on educational outreach for the protection of the Snowy Plover in the Wildlife Protection Area. We have also worked closely with other recreational groups including, the horse community, the windsurfing and the surfing communities as well as other dog groups to promote and facilitate co-existence among all park users and to protect natural resources. We have created sixteen educational videos promoting responsible dog recreation in the GGNRA as well as how to submit substantive comments. We work closely with the San Francisco SPCA and the Marin Humane Society and we are a member of the Eco-dog coalition promoting responsible dog ownership.

The Crissy Field Dog Group retained Kenneth S. Weiner, Esq. of K&L Gates LLP, a nationally recognized expert in the National Environmental Policy Act as well as TetraTech, Inc. independent environmental consultants to provide a review of the 2400 page Draft Plan/DEIS. Their review is

included in the attached appendices.

After all of the time and effort that has been put into the development of a balanced dog management plan, CFDG is extraordinarily disappointed in the quality of the Draft Plan/DEIS. We are quite dismayed by: (1) the litany of undocumented assumptions throughout the Draft Plan/DEIS; (2) the lack of analysis by the GGNRA of the existing conditions; (3) the failure of the GGNRA to adequately explore the impact of application of existing management measures to the no-action alternative; (4) the failure of the GGNRA to acknowledge that the GGNRA is a recreational area in a major metropolitan area; (5) the failure of the GGNRA to address or acknowledge the scoping comments submitted by CFDG in April 2006; and (6) the failure of the GGNRA to include any of the reasonable alternatives suggested by the a coalition of interested parties at the end of the Negotiated Rule Making process (see Appendix K). The Draft Plan/DEIS improperly treats recreation and environmental interests as mutually exclusive rather than recognizing both as important values under the National Environmental Policy Act as well as the enabling legislation for the GGNRA. In fact, the Draft Plan/DEIS does not even include a section addressing the impact on recreational users. (See Appendix B) The Draft Plan/DEIS includes a prohibition on certain recreational uses for all new lands without any justification or analysis. Finally the Draft Plan/DEIS proposes a punitive non-transparent compliance program to be internally administered without any public input with uncertain and undefined parameters. Set forth in the appendices attached, are specific comments on each of these points.

We are also very concerned going forward about the transparency of the review process for these comments, allowed under the National Environmental Policy Act, and the ability of the public to have a dialogue with the GGNRA about how to create a sustainable and balanced dog management plan.

The GGNRA plays a critical role in providing a home for many natural and cultural treasures, and, because of its proximity to a dense, urban environment, it provides special recreational opportunities to city dwellers. Recreation is called out in the 1972 GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognized that the achievement of these outstanding values is not mutually exclusive. Our organization supports the National Park Service (NPS) in its mission to protect the GGNRA's important natural, cultural, and recreational values but, through this letter, we challenge the NPS work with its constituents and local communities to find solutions that are designed to protect all of the park's values and broaden opportunities to enjoy its diverse resources sustainably.

Our comments are described in two main sections: (1) Recommended

Alternative, which describes our thoughts on how the NPS could balance the GGNRA's myriad resources and opportunities; and (2) Quality of Information in the Draft Plan/DEIS, which describes our thoughts on how the information in the Draft Plan/DEIS could be improved in order to support a better outcome for all interests involved.

Recommended "Hybrid" Alternative The NPS should consider a hybrid alternative that includes the following three interrelated items with a rational approach to balancing preservation of natural and recreational values:

e Adaptive Management Plan ? Management Actions Recreation Committee

Further information on this alternative is included in Appendix A.

Quality of Information in the Draft Plan/DEIS

My organization's major concerns with the quality of information in the Draft Plan/DEIS include:

1. Improper analysis of environmentally preferred alternative.
2. Omission of relevant impacts and impact analyses o Recreation (also see Appendix B) o Other impacts o 3. Insufficient information needed to draw logical conclusions and evaluate alternatives: o Unclear enforcement data (also see Appendix C) o Lack of and inconsistent site-specific, scientific data on baseline conditions (also see Appendices D, E, and F) o Reliance on undocumented assumptions o Flawed evaluation of No Action alternative o Resultant flawed alternatives analysis
4. Improper treatment of new lands
5. Lack of specificity in proposed action

These concerns are described in detail below and several are outlined further in the attached appendices. At the end of each section, we have provided recommended changes that we request you make to the EIS and the proposed action in order to move forward with a plan that is protective of all of the GGNRA's myriad resources and values.

I. Improper Analysis of Environmentally Preferred Alternative

The Draft Plan/DEIS takes a narrow perspective that the alternative that most preserves natural values only is the environmentally-preferred option. Where you have a national recreation area whose mission is natural, recreational, scenic and cultural values in a great city ' and all of these values are part of NEPA's view of a quality environment ' the environmentally preferred alternative is the alternative that most promotes

all of these core environmental values. Because the Draft Plan/DEIS does not recognize recreational resources as an environmental resource, the analysis of the environmentally preferable alternative is flawed. We point this out because it reflects a bias in the document that systematically does not yet recognize that this plan is for an urban recreation area that needs to 'in the words of GGNRA's own mission: 'preserve natural and recreational values unimpaired.' It fails to consider the range of resources afforded by the GGNRA that could be affected by the action alternatives. Recreation is called out in the GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognizes that the achievement of these outstanding values is not mutually exclusive. The environmentally preferable alternative is one that would employ environmental design and adaptive management techniques to preserve all of the outstanding values of the GGNRA. Further detail on this issue can be found under our comments above related to our recommended hybrid alternative.

*Recommendation. In Chapter 2, starting on page 99, the discussion of the environmentally preferable alternative should be revised to reflect the value of recreational resources. Since protection of the environment includes protection of established recreational opportunities and facilities on GGNRA lands and nearby parklands, the Draft Plan/DEIS should consider such resources as part of its selection of the environmentally preferable alternative. Detailed recommendations on how to revise this section of the Draft Plan/DEIS are listed in Appendix A.

2. Omission of Relevant Impacts and Impact Analyze

Recreation Congress' original intent when it established the GGNRA is stated in the bill reports for the 1972 legislation ' that GGNRA, "will ensure its continuity as open space for the use and enjoyment of present and future generations of city-dwellers" [House Report No. 92-1391, Sept. 12, 1972]. [emphasis added]. Similarly, as stated in the first section of Public Law 92-589, Congress established GGNRA to preserve for public use and enjoyment areas of Marin and San Francisco County possessing "outstanding natural, historic, scenic and recreational values" and to "provide for needed recreational open space necessary to urban environment and planning" and to protect the scenic and natural character of the area from incompatible development. Dog walking was well-known and recognized by Congress as part of this public use and enjoyment. Both the Senate and House reports comment that the proposed area:

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

The official legislative history notes:

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

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

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

The Draft Plan/DEIS not only fails to disclose and evaluate the impacts of the alternatives on recreational resources in the context of an urban environment, it dismisses the quality of the urban environment entirely on page 22 where it states, "the quality of urban areas is not a significant factor in determining a dog management plan." As recognized in its enabling legislation, one of the most important aspects of the GGNRA is the sharp contrast between its undeveloped open spaces and the adjacent developed urban environment. The GGNRA's open space and recreational opportunities are intended to provide refuge and relief for nearby urban dwellers.

The impacts on the GGNRA's open space and recreational opportunities should have been evaluated fully in the Draft Plan/DEIS, especially since a NEPA analysis is not limited to the natural environment. According to NEPA, An EIS is required to analyze the human environment. The federal NEPA rules define the human environment and its scope in an EIS as follows:

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

When an EIS is prepared and human and natural/ physical environmental effects are interrelated, the EIS should discuss all of these effects on the human environment.

*Recommendation. Any significant limitations on recreational uses

proposed by NPS needs to be properly examined, as it impairs a fundamental value that must be preserved under GGNRA's charter. The Draft Plan/DEIS should be revised to include a stand-alone analysis of impacts on recreation resources in order to fully consider the potentially significant effects that the proposed action and action alternatives could have on these elements of the human environment. The section should give context to the important role played by the GGNRA in terms of its proximity to a dense, urban environment and the special opportunities it affords to nearby populations. It should describe existing recreational uses of the GGNRA and other parklands in the project vicinity, the impacts of the proposed action on recreation resources and urban quality (including direct, indirect and cumulative impacts), and the mitigation that the NPS will commit to in order to avoid such impacts.

Although the analysis of impacts on recreation resources could potentially be integrated into the existing Visitor Use and Experience section, it is strongly suggested that it be incorporated into the draft EIS in a separate chapter. The rationale for this request is because the topic of "Visitor Use and Experience" is too limiting to encompass the broader range of recreation impacts that could potentially occur with implementation of the proposed action, including degradation of established recreational activities and facilities in GGNRA and nearby lands. A suggested annotated outline of the stand-alone recreation resources section is presented in Appendix B for your consideration.

Other impacts

The Draft Plan/DEIS assumes but does not provide the required rigorous analysis that resource conditions result solely from dog use of the sites, discounting the contribution from other visitors and recreational users. The Draft Plan/DEIS does not address the contribution of other impactful activities, including special events, to the resource conditions and existing impacts at each of the GGNRA sites. The level of site use from a single special event is likely equivalent to the level of regular use that occurs over weeks, months or longer. These special events include the annual Fleet Week at Crissy Field and the future impact of America's Cup on GGNRA lands.

*Recommendation. To address this deficiency, the GGNRA should study the contribution that all visitors make to existing resource conditions and potential impacts. This information is obtainable and essential to a reasoned choice among alternatives. The preferred alternative should then be re-evaluated and modified to address only the issues that specifically result from dog use at each of the sites. The NPS should then pursue a comprehensive approach to managing all these uses to the benefit of the full

ranges of GGNRA resources and values.

4. Insufficient Information Needed to Draw Logical Conclusions and Evaluate Alternatives In many places, the Draft Plan/DEIS does not provide any data on actual impacts by dogs in areas being proposed for new dog walking restrictions. In places where data are provided, the Draft Plan/DEIS makes undocumented assumptions that there are unacceptable impacts and that dogs are the culprits. For example, in the Western snowy plover sections of Chapters 3 and 4, the Draft Plan/DEIS explains that people, as well as dogs, who traverse dune areas disturb shorebirds. Monitoring surveys observed 48 off-leash dogs chasing birds over a period of 12 years. However, in this case the birds continue to return to the area each year. Therefore, there might or might not be a problem ' the Draft Plan/DEIS does not provide substantive data to help the reader decide. If there is a problem, the Draft Plan/DEIS doesn't provide logical conclusions as to whether access should be limited for people, for dogs, or both.

The Draft Plan/DEIS is, in some respects, comprised of about 20 plans and EISs, because it examines each GGNRA unit. We can appreciate how difficult this is for GGNRA and the NPS to accomplish. But, NEPA guidance and case law have consistently explained that difficulty does not excuse lack of adequate data and study in an EIS. And the bulk or size of an EIS does not equate to its adequacy. In many places, as described in more detail below, the Draft Plan/DEIS lack any description of actual site specific impacts on which decisions on dog-walking restrictions are being proposed. In other places, the Draft Plan/DEIS assumes species are present in areas where there is no record of their presence. In other places, there is inconsistent information about the presence of species.

Unclear enforcement data Many of the findings in the Draft Plan/DEIS are founded on a reference included in the document as Appendix G, "Law Enforcement Data" (NPS 2008c). This reference document is critically deficient in substantiating statements made in the characterization of existing conditions and in the analysis of the environmental consequences. Per NEPA, "Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements (CFR 1502.24)." Additional detail on this issue can be found in Appendix C.

*Recommendation. The Draft Plan/DEIS should be revised to provide clear evidence in the record to support all of its findings. The NPS needs to ensure the professional integrity, including scientific integrity, of the analysis and findings contained within its Draft Plan/DEIS. Detailed recommendations on how to revise the enforcement data in the Draft Plan/DEIS, and the ensuing impacts and alternatives analysis, are listed in

Appendix C.

Lack of and inconsistent site-specific scientific data on baseline conditions

The Draft Plan/DEIS does not address site-specific resources and the condition/health of those resources. This lack of information results in a vague baseline against which to assess the magnitude of impacts associated with implementing the proposed action and alternatives. With such a vague baseline, it's also difficult to assess the need to change existing dog management strategies.

Select examples:

a. The affected environment section mentions California Native Plant Society (CNPS)-listed species as having the potential to occur within the GGNRA but no data are provided as to where/if they are actually present. b. While some special-status species descriptions suggest a nexus between dog activity and the species and/or their habitat (tidewater goby, California red-legged frog), other species descriptions do not (San Francisco garter snake, Coho salmon), and there is a consistent lack of detail describing the existing interaction, if any, between the species and dog activity. c. There are inconsistencies regarding the presence of species in the text and in Table 8 in the Special-Status Species affected environment, the information in Appendix H, and the impact analyses in Chapter 4. d. In Table 8 on page 246, the GGNRA Location column contains the location for plants that do not exist there according to the text. e. For a number of the analyses of Alternatives B-E, the Draft Plan/DEIS states that the area of impact is currently undisturbed. This is not the case, as dogs and humans are currently allowed in those areas. Additional examples are provided in Appendix D, "Soils and Geology," Appendix E, "Water Quality," and Appendix F, "Biology."

*Recommendation. To address this deficiency, the Draft Plan/DEIS should provide site-by-site assessments of the conditions of the GGNRA resources and values at each of the 21 sites. The selected preferred alternative for each site should then be re-assessed and modified to address only those site-specific issues and to employ adaptive management (proposed adaptive management techniques are provided at the end of this letter) to ensure the goal of protecting those resources and values is achieved.

Reliance on undocumented assumptions

The Draft Plan/DEIS assumes, but fails to demonstrate, the "cause and effect" relationships without site-specific supporting information. For instance, the Draft Plan/DEIS assumes but does not demonstrate that where dogs are present within GGNRA sites, there is a disturbance of natural

resources. The Draft Plan/DEIS also assumes but does not demonstrate that the disturbance of resources is attributable to dogs (versus other factors). These assumptions result in flawed conclusions that the mere presence of dogs is equivalent to adverse resource impacts. The findings of an EIS must be based on scientific accuracy and clear evidence in the record. This Draft Plan/DEIS is significantly flawed in that it does not rely on adequate evidence for the conclusions it draws, and in that it fails to clarify its methodology for drawing those conclusions.

Select examples:

a. The text from Chapter 3 provides data on the western snowy plover, but beyond providing numbers of observations, the Draft Plan/DEIS does not provide evidence that dogs chasing the birds are likely to impact the survival of the species taking all relevant factors into account (see paragraph 1, page 799). b. The Draft Plan/DEIS presents no information supporting the finding that dogs are currently impacting shorebirds and marine mammals. Therefore, there is no scientific rationale for prohibiting dogs from beach areas under Alternative D to "protect shorebirds and stranded marine mammals," as stated on page 151. c. The Soils and Geology section (page 225) includes the following statements: "Dogs and dog walkers that do not stay on designated trails and venture off trail create social trails that become denuded of vegetation and result in increased soil compaction." and "Soil compaction is common along social trails that have been created by ' and are heavily used by ' bikers, hikers, runners, and dog walkers." The baseline for comparison throughout the Draft Plan/DEIS should not be an environment in which it is assumed that there is no impact unless dogs are present, but one in which the impact of dogs is added to the impact of humans. At about 200 pounds per adult, the force that a human exerts on the soil one foot at a time would have a significantly greater impact on soil compaction in a picnic area than the force exerted by even a large 70-pound dog distributing its weight on four paws. The failure to acknowledge that human use has more impact on soils and geology in this regard, compared to dog use, uncritically loads the analysis in favor of restrictions on dogs. While there may be areas in which impacts from dogs are unacceptable, the same criterion holds for impacts from humans, and in most of these areas, dogs and humans are already excluded. d. The Soils and Geology section (page 112) on Homestead Valley concludes that, under the No Action Alternative, there would be long-term adverse impacts from "soil compaction, erosion, and nutrient addition..., in areas off the trail since dogs would be under voice control," while under other alternatives it is concluded that the impacts would be negligible because dogs would be under physical restraint. This is an unsubstantiated assumption in support of the underlying bias of the analysis. The analysis does not attempt to connect intensity of use and impact and seems to be based solely on the incorrect assumption

that humans and wildlife would have no impact on off-trail areas, and that all impacts can be attributed to dogs.

*Recommendation. To address this deficiency, the NPS should re-evaluate untested, assumed linkages and re-define the existing and potential impacts that specifically result from dog use at each of the GGNRA sites. The preferred alternative for each site should then be re-assessed and modified to address only those site-specific impacts and issues.

Flawed evaluation of No Action alternative

The impacts of the No Action alternative are substantially overstated because the Draft Plan/DEIS determines individual areas of compliance with existing dog management strategies without sufficient supporting data and assumes that noncompliance results in adverse impacts. This unsupported logic both overstates the degree of additional management required to address the resource issues, but also misrepresents the relative impacts of the four action alternatives; for example, the public is assumed to comply with management strategies under an action alternative, whereas the public is found to be noncompliant with those same management strategies under the No Action alternative.

Select examples:

a. For many sites, including Stinson Beach, Crissy Field, Baker Beach and Bluffs, Mori Point, Oakwood Valley, and Muir Beach, analysis of Alternative A acknowledges noncompliance, while the other alternatives assume full compliance with dog restrictions. In some cases, the management strategy is the same, with the only difference between Alternative A and the preferred alternative being the assumption of compliance. b. On page 109 (Table 5, Stinson Beach, Soils and Geology) under Alternative A, the second bullet identifies long-term, minor, adverse impacts in areas outside parking lots and picnic areas. These impacts are not repeated under the other alternatives despite the fact that, except for Alternative D, the management strategies under all of the alternatives are identical for Stinson Beach. Each of the statements in the first bullet, except for Alternative A, No Action, includes the clause "assuming compliance." At least for the soils and geology evaluation, the analysis seems to take it for granted that the No Action Alternative is inferior. Both of these are examples of biasing the analysis against No Action. c. On pages 1147-1158, mission blue butterfly, Fort Baker and Milagra Ridge ' as with many examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) and the preferred alternative assumes compliance (negligible to minor, adverse impacts, with habitat restoration programs). d. On pages 1219-1240, San Francisco garter snake, Mori Point, Milagra Ridge, Cattle Hill, Pedro Point ' as with many

examples in the Wildlife section, here Alternative A assumes noncompliance with leash laws (minor, adverse impacts) while the preferred alternative assumes compliance (negligible). The text states (page 1230) that there is no documentation. that the current level of compliance with on-leash laws (No Action Alternative) is impacting this species. e. In the Water Quality section, the impact analysis for Alternatives B through E assumes compliance with the management strategies. However, the impact analysis for Alternative A does not make this same assumption. f.

*Recommendation. To address this deficiency, the NPS should re-evaluate unsupported assumptions and the analysis of the No Action alternative to ensure the methodology used for it is consistent with the methodology used for the action alternatives. The No Action alternative is a continuation of the current GGNRA management plan and policies ' not a continuation of existing conditions. The current plan and supporting documents include policies for good public information and education on GGNRA resources and partnerships with the community. The No Action alternative can and should include improved education and compliance measures (including accurate signage about voice control areas) to implement these current plan policies (which are also policies in the proposed GGNRA updated general management plan), including dog owner training, to raise the level of compliance.

Resultant flawed alternatives analysis

As described above in this section, the Draft Plan/DEIS assumes but does not provide the required rigorous analysis to enable the reader to draw logical conclusions about impacts and alternatives. The Draft Plan/DEIS does not provide adequate information on which to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of resources" (as required by NEPA Section 102(2)(E); 40 CFR "1501.2 and 1502.1 and corresponding DOI and NPS implementing guidance), or to allow meaningful evaluation on the alternatives including reasonable mitigation measures, as required by NEPA (e.g., 40 CFR "1502.14(b)and 1508.25(b) and corresponding DOI and NPS implementing guidance). This issue in the Draft Plan/DEIS results in a bias in the evaluation of alternatives, contrary to NEPA's requirement that "Environmental Impact Statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made" (40 CFR ' 1502.2(g)).

Select examples:

a. The impacts of the No Action Alternative are substantially overstated because the Draft Plan/DEES assumes that noncompliance results in adverse impacts. This both overstates the degree of management required to address

the resource issues, but also misrepresents the relative impacts of the four action alternatives; for example, the public is assumed to comply with management strategies under an action alternative, whereas the public is found to be noncompliant with those same management strategies under the No Action Alternative. b. On page 1264, bank swallow ' as with the western snowy plover, current impacts are considered minor to moderate based on occasional to frequent perceptible disturbances to the species from dogs; however, the description of Alternative A mentions only that dogs have been seen in the bluff area. There is no apparent nexus between dog activity and actual impact to bank swallows ' is the presence of a dog in the bluff area assumed to disturb the colony? Have the birds been observed flushing from nests, or have crushed burrows been found? The language here suggests these impacts are possible, but that they haven't actually occurred. c. In Chapter 2, starting on page 99, the discussion of the environmentally preferable alternative should be revised to reflect the value of recreational resources. Because the draft EIS does not recognize recreational resources as an environmental resource, the analysis of the environmentally preferable alternative is flawed. It fails to consider the range of resources afforded by the GGNRA that could be affected by the action alternatives. Recreation is called out in the GGNRA enabling legislation as one of the four outstanding values to be maintained and protected. In doing so, the enabling legislation recognizes that the achievement of these outstanding values is not mutually exclusive.

*Recommendation. To address this deficiency, the NPS should re-evaluate unsupported assumptions and the analysis of the alternatives to ensure the methodology used for it is consistent and based on site specific scientific data. And, since protection of the environment includes protection of established recreational opportunities and facilities on GGNRA lands and nearby parklands, the draft EIS should consider such resources as part of its selection of the environmentally preferable alternative. Under NEPA, the environmentally preferable alternative is one that would employ environmental design and adaptive management techniques to preserve all of the outstanding values of the GGNRA.

4. Improper Treatment of New Lands

The proposed action to close new lands to dog walking access conflicts with the GGNRA Enabling Legislation (PC 92-589) and with National Park Service Management Policies (2006) for determining uses and land protection plans. GGNRA is required to consider new lands in the same way that it considers uses and land protection measures on lands within GGNRA. The unprecedented "Closed until open" proposal would violate GGNRA's statutory obligation to preserve and maintain recreational uses, violate sound land planning with the community, and violate NEPA by prejudging alternatives before site-specific public and environmental review. There is

no basis for treating new lands differently than existing lands under NPS regulations and policies. Furthermore, there is no such policy in the existing GGNRA General Management Plan and Compendium. The Draft Plan/DEIS notes (p. 36), the enabling legislation states GGNRA's purpose as follows (emphasis added):

"In order to preserve for public use and enjoyment certain areas of Marin and San Francisco counties, California, possessing outstanding natural, historic, scenic, and recreational values and in order to provide for the maintenance of needed recreational open space necessary to urban environment and planning, the Golden Gate National Recreation Area is hereby established."

The phrases "preserve for public use and enjoyment" and "maintenance of needed recreational open space" set out a high standard for management actions that would limit or restrict this fundamental value and resource of the GGNRA. The words "preserve" and "maintain" mean the continuation of uses, recognizing that uses may be regulated to protect the other fundamental values of the GGNRA. NPS management policies expressly reflect this emphasis on continuing uses, measured by the yardstick of the unit's enabling legislation. Section 1.4.3.1 states:

In determining whether or how to allow the use, park managers must consider the congressional or presidential interest, as expressed in the enabling legislation or proclamation, that the use or uses continue. When new lands become part of GGNRA, the recreational uses existing at the time of acquisition should be allowed to continue unless GGNRA determines, through the public land planning and NEPA process, that unacceptable impairment would occur (as explained in Chapter 1 and Appendix C of the Draft Plan/DEIS).

Section 3.3 of the NPS management policies make clear that protective measures are to be integrated in to the planning process -- "Planning for the protection of park lands will be integrated into the planning process for park management" -- not be integrated into the planning process for park management" -- not predetermined in advance of site specific the public planning and environmental review process.

In preparing land protection plans, Section 3.3 requires: "A thorough review of a park's authorizing statutes and complete legislative history will be conducted as part of the land protection planning process."

Section 3.3 states that land protection plans should determine what "means of protection are available to achieve the purposes for which the unit was created." As noted above, recreational use is one of the basic purposes for which GGNRA was created. Dog walking was contemplated as a traditional

use in GGNRA and was plainly discussed in both the Senate and House bill reports, basic legislative history documents.

In the Introduction to land protection, the NPS management policies state (chapter 3, emphasis added):

The National Park Service will use all available authorities to protect lands and resources within units of the national park system, and the Park Service will seek to acquire nonfederal lands and interests in land that have been identified for acquisition as promptly as possible. For lands not in federal ownership, both those that have been identified for acquisition and other nonfederally owned lands within a park unit's authorized boundaries, the Service will cooperate with federal agencies; tribal, state, and local governments; nonprofit organizations; and property owners to provide appropriate protection measures.

To fulfill this obligation, GGNRA needs to cooperate with these entities, including nonprofit community groups and property owners adjoining GGNRA, to protect recreational resources. As Management Policy 1.4.3.1 directs:

Where there is strong public interest in a particular use, opportunities for civic engagement and cooperative conservation should be factored into the decision-making process.

GGNRA is aware of the strong public interest in dog walking access, and of the interest of San Francisco and Marin. Counties and responsible community and nonprofit organizations in cooperative conservation. It is entirely inappropriate and contrary to these management policies to close new lands to dog walking access without first providing opportunities for this civic engagement and for cooperative conservation efforts.

In conclusion, there is no basis in existing law or adopted policy for the NPS and the GGNRA dog management plan to summarily reject and fail to preserve and maintain an important recreational use on new lands that is allowed on existing lands, particularly in advance of sound environmental review and land use planning. This Plan and Draft Plan/DEIS do not provide this review and planning, because by definition, new lands have not yet been fully studied, acquired or subject to the level of site specific review required of this EIS.

For reasons noted above, it is inaccurate wrong to treat dog walking as the establishment of a "new use" in GGNRA, which would be the result of the proposed policy. We understand GGNRA's desire to create a presumption against continuing this use, however, there is no factual, legal, or

management policy basis for this approach.

*Recommendation. The preferred alternative should be revised to make clear that new lands will be treated the same as any other GGNRA lands and follow the same NPS management policies. Recreational uses should be allowed to continue except as may be regulated through site-specific public land planning processes and associated environmental review.

5. Lack of Specificity in Proposed Action

The description of Elements Common to Action Alternatives (pages 63-67 in the Draft Plan/DEIS) describes the proposed 75% compliance standard and secondary management response, but does not provide details of the monitoring plan or other elements of an adaptive management plan on which the management response would be based. The draft Plan/Draft Plan/DEIS does not propose an adaptive management component that meets applicable guidance and that can be meaningfully reviewed, as called for in NEPA procedures and current Council for Environmental Quality (CEQ) mitigation and monitoring guidance (January 2011), including but not limited to pages 9-11 and pages 13 and 19 (on the role of the public in the design and review of results).

Select examples:

a. The Draft Plan/Draft Plan/DEIS states (page 1725) that "the compliance-based management strategy is an important and effective tool to manage uncertainty when proposing new action" and "has been created" to assure successful implementation and long-term sustainability. However, the detailed description of this critical element has not been conveyed and is not included in the document (as noted on page 64). b. The Draft Plan/DEIS doesn't establish how or why a special-status species that has been sharing habitat with dogs for decades will experience an actual, likely benefit from stricter dog management, given other factors affecting the species. c. Where management actions that limit recreational access are proposed or under serious consideration, the Draft Plan/DEIS should also disclose whether access will be limited for people as well as dogs. The evaluation of significance under NEPA requires consideration of context and intensity. Meaningful public comment on proposed management measures is not possible without full disclosure of the impacts to all users and potential management measures. disclosure of the impacts to all users and potential management measures. *Recommendation. To address this deficiency, the NPS should fully disclose the details of the proposed action. it should describe how it will monitor compliance and resources and values at specific sites because the management measures are specific to GGNR.A sites. In addition to assessing the condition of these resources and values, monitoring should also focus on determining the contribution to those conditions from

other users and factors, including other human users and natural processes. This should be implemented as part of each alternative. Only through this objective monitoring approach can the GGNRA demonstrate that it has addressed the purpose and need on which the Dog Management Plan is based. Existing or proposed management strategies should be modified based on the objective monitoring results. Although it could be appropriate to use properly measured rates of compliance as an indicator, the draft Plan and Draft Plan/DEIS does not provide adequate information about the compliance-based program. To ensure objectivity, this monitoring should be conducted by an independent qualified third party with the results discussed with interested groups and made publicly available as part of a defined and technically-sound adaptive management program. Additional recommendations on management actions that should be considered by the NPS are provided below.

Concluding Comments

In conclusion, CFDG is committed to working with the GGNRA to implement a reasonable balanced dog management plan that is based upon accurate facts and science and that balances all of the values identified in the 1972 GGNRA enabling legislation.

Sincerely,

Martha Walters

Chair, Crissy Field Dog Group cc: Sen. Diane Feinstein Rep. Nancy Pelosi
Rep. Norm Dicks Rep. Doc Hastings Secretary Ken Salazar NPS Director
Jon Jarvis Mayor Ed Lee Supervisor Scott Wiener San Francisco SPCA
Marin Humane Society Peninsula Humane Society- SPCA

Enclosures: Appendix A: Hybrid Alternative Appendix B: Recreation
Resources ' Suggested Annotated Outline Appendix C: Additional
Comments Related to Appendix G, "Law Enforcement Data" Appendix D:
Additional Comments Related to Draft Plan/DEIS Analysis of Geology and
Soils Appendix E: Additional Comments Related Draft Plan/DEIS Analysis
of Water Quality Appendix F: Additional Comments Related Draft
Plan/DEIS Analysis of Biological Resources Appendix G: Testimony of
Kenneth S. Weiner on Behalf of Crissy Field Dog Group Before San
Francisco Board of Supervisors Appendix H: Testimony of Rebecca Katz
Director of San Francisco Animal Care & Control Before San Francisco
Board of Supervisors Appendix I: Testimony of Andrea Buffa Before San
Francisco Board of Supervisors Appendix J: Testimony of Keith McAllister
Before San Francisco Board of Supervisors Appendix K: CFDG Scoping
Letter and Proposal from Negotiated Rule Making

FOOTNOTES: 1 These videos have had approximately 4000 downloads according to YouTube and Vimeo analytics.

Correspondence ID: 4699 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter
Correspondence: Dear Mr. Dean:

I was born and raised in San Francisco, and when I had a dog, I walked him daily at Ocean Beach and Fort Funston. Although there are city "dog parks" near my home, I much prefer going to outdoor areas where I can hike with friends and enjoy nature, while exercising my dog. Unless I drive to Marin or the East Bay, the GGNRA sites are the only places in San Francisco where this is possible for me.

The DEIS fails to assess the impact on local parks if you reduce your off-leash areas to small "dog play areas". I remember when Ocean Beach was closed to off-leash dogs in the 1990's ' the impact to Fort Funston and even some city parks was dramatic. I understand there may be as many as 800,000 yearly visitors to Fort Funston alone and over 85% of them come to hike with their dogs. Imagine the impact if even 25% of these people choose to use city parks instead?

I've reviewed the online petition that was created to give people a way to express their concerns about the draft Dog Management Plan. It is evident that people are scared, frustrated, concerned ... it is imperative that you provide an alternative that allows us to hike with our dogs. Rather than just restrict our access, why didn't you look at the specific sites and determine what works well & what can be improved? Better enforcement of existing laws, more signage, clearer rules ... those of us who want to continue to walk in the GGNRA do so BECAUSE of the natural beauty we find. We want to preserve this too, but we do not think unwarranted restrictions are the answer.

I agree with the sentiments expressed by the petition signers and I am submitting these as my own comment.

Sincerely, Tessie Chua San Francisco, CA 94118

Correspondence ID: 4700 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: Letter

Correspondence: Dear Mr. Dean:

I am a long-time resident of San Francisco and I am not a dog-owner. I am a frequent user of the GGNRA areas near my home (primarily Ocean Beach and Fort Funston) and one of the delights of walking in these areas is watching the dogs. I often bring out-of-town guests on my walks and they are stunned to see how well the dogs get along ' and very surprised to discover that San Francisco offers such a recreation opportunity to dogs and their owners.

I think this is especially important for seniors and families with children. Having to walk the dog makes a good excuse to get out of the house and get exercise and socialize. Study after study has pointed to the health benefits for seniors. It helped teach my son (and countless other children) responsibility, social skills and appreciation for the natural beauty of the Bay Area. It gets children off their bottoms and out from the TV on a Saturday morning. In this day and age, when people are so concerned about childhood obesity, and the mental and physical health of our children, it makes no sense to deny families an opportunity to be together in a non-commercial, active setting.

My son is 21 years old now and he has been walking at Fort Funston since he was a baby. When relatives visit, they always ask to take a walk "with the dogs". I've always been proud of the fact that, once again, San Francisco offers something unusual. We are not like other cities, nor has this ever been our goal. I like the fact that Fort Funston and Ocean Beach are not fenced in dog parks ' off-leash recreation is just part of the overall recreational opportunity at these sites.

I've looked at the DEIS and find many references to "impacts on other parks" as being negligible. This can't possibly be true. I live near Golden Gate Park and the small, enclosed dog run is completely overrun. If you eliminate most of the off-leash recreation at Fort Funston and Ocean Beach, where will these people go? There WILL be an impact on local parks. Also, when you eliminate most of the off-leash recreation, my own walks will be much less interesting.

I am including a partial transcript script of a recent hearing at the Board of Supervisors Land Use and Economic Development Committee Meeting of April 11, 2011. I am in agreement with the points raised by the people testifying before this committee and submit them to you as my own comment.

Sincerely, Sama Meshel San Francisco, CA 94121-3424 City & County of San Francisco Board of Supervisors Land Use and Economic Development Committee Meeting April 11, 2011 Transcript of Agenda Items 4 & 5

Present: Supervisors Eric Mar (Committee Chair), Malia Cohen, Scott Wiener
Clerk: Alisa Somera

CLERK ALISA SOMERA: Item number 4: hearing on the effects of Golden Gate National Recreation Area's draft Off-Leash Dog Policy. Item number 5: resolution opposing the Golden Gate National Recreation Area's Preferred Alternatives for Dog Management.

COMMITTEE CHAIR ERIC MAR: And Supervisor Scott Wiener has called for this hearing.

SUPERVISOR SCOTT WIENER: Thank you, Chairman Mar. And I want to thank everyone both in the chamber today as well as in the overflow room, for taking the time to be here today and to take time away from your busy schedules and your jobs and your families and your lives to be here for this issue. I know that it's not convenient to come to City Hall in the middle of the day, so thank you.

We have limited public space in San Francisco and a lot of different uses of those spaces [time bell chimes]. Am I done? Okay, now we can go home. [laughter]

Anytime we have a discussion about how we utilize our limited public spaces, those discussions are controversial and result in passionate views on the subject. But we owe it to the people of San Francisco to engage in these important discussions. Many San Franciscans have dogs. Dogs need outdoor space for exercise, for recreation, and dog owners need access to outdoor space with their dogs. We've seen in San Francisco city parks the conflicts that sometimes occur between those with dogs and those without dogs, in terms of the allocation of our public spaces. Each of my colleagues, I am quite confident, has personal experience with these kinds of discussions and disputes. One of the things that lessens the tension in our city parks is the existence of GGNRA. GGNRA is beautiful. It is one of the true gems of this city, and the National Park Service should be commended for doing such a stellar job in maintaining it as a beautiful and attractive place.

Now we all know ' whatever one's opinion ' that over the past number of decades San Franciscans have relied on parts of GGNRA to walk their dogs both on leash and off leash. Whatever one's view is on the GGNRA proposal, I think that we can all agree that the proposal will have an impact on the ability of dog owners to access these lands in the ways they've been accustomed to doing so.

I, I have serious concerns about the GGNRA proposal, which is why I called for this hearing and why I introduced a resolution. I'm concerned about its impact on the ability of dog owners to bring their dogs to great open spaces

for recreation, and I'm concerned about the impact on our city parks if dogs lose access ' whether in part or in whole ' to GGNRA.

Now I also believe that we can have a GGNRA that values and cares for its natural heritage ' for plants, for wildlife, for natural terrain ' and that also allows for full recreational access for people and for dogs. In other words, we do not need to view this as an either/or. This needs to be a situation where everyone wins.

So we are going to, this is really a two-part hearing. The first part will focus on the GGNRA proposal, and after that is done, we will then talk about the possible regulation and permitting of commercial dog walkers in city parks.

So, before we proceed, if any of my colleagues have any remarks? Great. So before we get to public comment, we do have a few presentations from different perspectives, so that we can set the tone and get everything out on the table before the public comments. And first of all, I really want to thank GGNRA ' Frank Dean and Howard Levitt ' for, for coming today. I very much appreciate that, you taking the time. I'm glad the federal government didn't shut down, at least for now. And I, I just want to say thank you to you. And with that, we're going to start with the GGNRA. And you'll have five to ten minutes to present whatever you'd like to present about the plan. So thank you. Mr. Dean.

FRANK DEAN, SUPERINTENDENT, GGNRA: Good afternoon. Thank you, Supervisors, for the opportunity to come before you. My name is Frank Dean and I am the Superintendent of the Golden Gate National Recreation Area. And I appreciate the opportunity to come and speak today and hopefully bring a little bit of clarity to the issue, which I know is very controversial. And I think that, I should say at the outset that I am also a dog owner. My dog's name is Ranger, of course. And so I understand and appreciate this issue from a couple of perspectives. Just a little bit of context. I'm not sure if you guys are seeing the slides, but this, we'll try this. There we go.

The Golden Gate National Recreation Area is a National Park Service area, it's a national area. It was established in 1972 to protect the natural, scenic, and cultural values and the recreational resources in the park. And again, the second paragraph [referring to slide] shows that it was set up for public use and enjoyment. So we have the recreational aspect, and then further down in the paragraph, it talks about protecting the park in its natural setting, protecting it from development and uses that would destroy it.

So our challenge is really a balance ' it's protecting resources and balancing the use. This is a shot of Crissy Field. We have a ' we're skipping slides here, but we have a variety of uses here that we, that we provide to the

public, and it's, it's quite varied in, in our constituency ' all types of activities, not merely dog walking or hiking or, or, or fishing or, or jogging ' it's all kinds of users. We need to go back.

So, just a bit of context of how we got here and where we're going. Again, the park was set up in 1972 and back then the default rule for dogs and pets was the national rule that we have in the National Park Service under the Code of Federal Regulations, and that is that pets need to be on a leash where they're allowed by the park management.

In 1979, in response to increased use of the park and, and requests from the dog walking community, there was a, a policy was set up by our Advisory Commission at the time that was comprised of citizens that were appointed by the President, to set up a voice-control policy in certain areas of the park ' not all areas, but some areas. We learned later that that really had no basis in law, even though it was adopted. It was, it was an idea at the time to try to attempt to accommodate some use and protect the park in other ways.

Since that time the park has, has grown in popularity. The, the number of dogs, the number of people that come to the park has significantly increased. Things have changed. We've also restored Crissy Field. At the time the park policy was set up in 1979, Crissy Field was a, an abandoned air strip.

We also have had other forces that have come to bear on the park. We had the Endangered Species Act, which, in 1979, although the act existed, we did not know we had endangered Snowy Plovers and some other species that were residing in the park and using the park. So we had to set off certain areas of Fort Funston and Crissy Field to protect, and Ocean Beach, to protect those areas. That was the first time that we actually started to have some conflict with some of our users, when we started to restrict uses at certain times of the year.

2000-2005 we had several lawsuits, which sort of, about dogs being off leash. People were cited and they brought them to court, and then it sort of led to an understanding that there would be a need for a more formal rule making because of the controversy, the conflicts, the degradation of the resource, and then just general safety of our visitors.

We started to look at working with the various constituents in 2006 under a Negotiated Rulemaking process, and that lasted about a year and a half. It was a lot of good work, a lot of dedicated service by, by our citizens and users of the park, but it did not end in any kind of consensus as to how we should go forward. So fast forward to now, and we've decided to proceed with an environmental impact statement, which we have currently out in draft, which is the subject of today's discussion.

The purpose of all this really is to provide again some kind of balance in employee and visitor safety, reduce user conflicts, and to maintain the resources and values for the future.

Again, this is a balance, not a ban. It's often described as a ban on dogs. It's not at all. It's actually going to be different, if it's proposed, if the proposed plan is adopted. But it's not a ban. It will be different. It will be some changes ' some restrictions, perhaps ' but it's not an outright ban. Dog walking would remain a welcome park activity. There'll be seven proposed off-leash areas, five of them in San Francisco ' large portions of Crissy Field, Ocean Beach, and Fort Funston will remain open for off-leash use. A mile of Ocean Beach, half of Fort Funston beach, half of the Crissy Field airfield, and the entire central beach of Crissy Field would all remain open to off-leash dogs. There'll be 20 areas in the city that would remain open for dogs on a leash, and the plan provides for a variety of experiences, including for visitors that prefer not to interact with a dog, and it ultimately protects critical species and habitats.

We've often, over the years, worked with San Francisco on many issues, and this plan is no different. We plan to work with the city. This plan actually addresses impacts on city parklands. We could look at that. We're willing to work with the city officials and staff to see how we can, we can address your concerns and questions about that. And we look forward to that. We're working on many fronts with San Francisco right now, with the America's Cup and Sharp Park, to name just a few.

So, where do we go from here ' we need to hear from the public in a, in a really constructive and substantive way. To say that you're opposed to the plan or just don't like it is, is fine, but it's not helpful to shaping the plan. None of our plans ever look the same in the end as they did at the beginning, so we do listen, we're very open to constructive feedback. We need to hear from everyone, all groups, and all comments will be carefully reviewed and the final plan will respond to substantive comments. And ultimately the plan will be wise and appropriate for a national park area that it is.

We believe that this unique park can have a unique rule on dog use. This plan reflects years of hard work by hundreds of people, and its success will require everyone pulling together. So with that I'm available for questions or however you'd like to run the rest...

SUPERVISOR WIENER: Thank you. I do have a few questions. You, you just ' I was happy to hear that you just talked about how GGNRA would be working with the city. So, will, will GGNRA be effectively negotiating with the city in order to take into account the needs of San Francisco and its residents. In other words, apart from San Francisco, say, submitting a public comment, will there actually be a collaborative process to shape the plan

going forward?

SUPERINTENDENT DEAN: We can certainly have discussions with the city. I wouldn't characterize it as negotiating. We have a NEPA process, environmental review process, underway that, we have alternatives on the table. But again, constructive comments from the public and working with city officials ' we're all ears. We, we certainly, if, if there are certain things that need to be tweaked to make this work on the ground, we, we, we're open to that.

SUPERVISOR WIENER: Right. I think, as I understand it, the White House has instructed that under NEPA, federal agencies are to work with local officials. Is that, am I correct about that?

SUPERINTENDENT DEAN: Yes, I mean, we, we do, but it's, it's ' I'm not quite sure how you're characterizing it, but yes, we will work with you.

SUPERVISOR WIENER: Right.

SUPERINTENDENT DEAN: We're all, we're all ears.

SUPERVISOR WIENER: Okay, and, but apart from all ears, I mean is there...

SUPERINTENDENT DEAN: We can't come up with another alternative mid-stream here, so if, if, you know, we just can't develop it today or the next few weeks and then put it out there for review. We have to take the comments on what we have on the table, and then that will then inform and perhaps a new alternative will evolve from that. SUPERVISOR WIENER: So, for example, perhaps sticking with the current management plan but working with the city to improve enforcement ' would that be a possibility?

SUPERINTENDENT DEAN: Well, I, I don't believe the current, the status quo is sustainable, if it was working, we wouldn't be here today or talking about possible changes, so, are you asking for some sort of a delay, or, or more time, or..

SUPERVISOR WIENER: No, what I'm talking about, what the end result might be, because obviously there is disagreement about whether the current situation is, is working. I understand there's a perspective that says it's not, but there's also a perspective that says that it, perhaps with some smaller changes or changes to enforcement to ensure good behavior, that it could be a workable solution, instead of the rather significant change that the Preferred Alternative proposes.

SUPERINTENDENT DEAN: Well, I guess, it gets into how significant the

changes you, you're suggesting, but I, I mean, we don't believe in our professional judgment that the current situation is tenable or sustainable and that it's not working. We, we do see visitor conflicts, we see degradation of resource, we see people that are not welcome ' they, they tell us they don't feel like they can go to certain areas of the park ' so, how we steer that use, accommodating dogs in some way in the same areas ' whether it be some fencing or, or better signage or some enforcement, as you suggest ' in working with the city on, on, on the lands that they manage as well, I mean we're certainly open to, to any of those options.

SUPERVISOR WIENER: Now, does ' I know we've spoken before and I believe we're in agreement that GGNRA is not your typical national park, that it is an urban recreational area. Is that, is that your take as well?

SUPERINTENDENT DEAN: Well, it's a national park in an urban area, so it's, it's still that.

SUPERVISOR WIENER:.. And do you... SUPERINTENDENT DEAN: It is a national, it's a national recreation area, technically. We get that.

SUPERVISOR WIENER: Okay.

SUPERINTENDENT DEAN: But it is, but it is, but it is a national park area, and, and it's, I mean it is a park of the national park system. It's not, it's not a, in some ways, it's not any less or any different than Yosemite or any other national park as far as the policies that we have to adhere to. [talking within audience]

SUPERVISOR WIENER: If I, if I can just ask members of the public ' I understand a lot of us have very strong views about this, but under our rules, we ask people to refrain from speaking or applauding or booing or hissing or anything else ' we want to show respect. GGNRA did not have to come today. We don't have subpoena power. They're here to, to have a conversation.

Would, would you agree that recreational use is an important part of what GGNRA is, in terms of, it's in its name, it was in the Enabling Legislation.

SUPERINTENDENT DEAN: Absolutely. It's one of our core, core principles.

SUPERVISOR WIENER: Okay. And would you ' in terms of setting up how GGNRA is used, do, do you think it's important to take into account the needs of San Francisco, of its residents, of the people who are actually going to be using the facilities?

SUPERINTENDENT DEAN: Yes, it's, that's also one of our, our core tenets, is that we would accommodate the users that come to the park, whether they be from San Francisco or Marin or from Rhode Island ' it's, it's a national area.

SUPERVISOR WIENER: Now, in the DEIS it states that you did, the GG, GGNRA did consider the potential impacts on San Francisco, the Preferred Alternate, and that there would not be any significant impacts? Am I right about that?

SUPERINTENDENT DEAN: That's correct. That's what the document states.

SUPERVISOR WIENER: Okay, and what did GGNRA do to come to the conclusion that there would be no significant impacts of the Preferred Alternative on San Francisco?

SUPERINTENDENT DEAN: Well, it was not an exhaustive study; I will concede that. But basically we looked at the existing levels of use in city parks by dogs and users, and we looked at what we are proposing ' realizing again that it's not a ban, we're, we're, we're shifting people around within the existing parks that we manage, we're not banning them, to concentrate or focus the use in certain zones and to steer them away from other areas that might be more sensitive. We in the end did not believe that there would be significant impact on, on the adjacent parklands, whether they be city of San Francisco or San Mateo or Marin.

SUPERVISOR WIENER: Was there any numerical analysis..

SUPERINTENDENT DEAN: No, no there was not.

SUPERVISOR WIENER: Okay. And I don't know if this has, if anyone's mentioned this to you, but during the tsunami warning, Ocean Beach and Fort Funston I think were shut down as a precautionary safety measure. And I wasn't there personally, but I've been informed that Stern Grove had just, was basically overrun with dogs that day. And it's presumably that there may have been a causal connection there, was ' one happened right after the other. Were you aware, was, were you aware of that?

SUPERINTENDENT DEAN: I've heard that story as well, and, and and assuming that maybe for the moment, the example that there was a connection ' it, it wouldn't be exactly as we would propose under this plan because under the plan a mile of Ocean Beach would still be open to dogs off leash, at Fort Funston the uplands would be open ' certain areas, of course ' and the Fort Funston beach. So the tsunami, you know, situation was a bit different than ' everything was shut down on the coast, which is

not what we're proposing at all in this plan.

SUPERVISOR WIENER: Now, speaking of which, there is a ' I forget what it's called ' the compliance-based escalation?

SUPERINTENDENT DEAN: Yes.

SUPERVISOR WIENER: What's, what's the phrase?

SUPERINTENDENT DEAN: Compliance-based management.

SUPERVISOR WIENER: Yeah. So, my understanding is that if, if there isn't 75% compliance at least, then it will go to the next most restrictive..

SUPERINTENDENT DEAN: Correct.

SUPERVISOR WIENER: ..which would be no more off-leash.

SUPERINTENDENT DEAN: Well, whatever zone it was in ' if it was a leashed area, it would go to perhaps no dogs, if it was, if it was an off-leash area, it would go to a leashed area.

SUPERVISOR WIENER: And, so at that point there would be no more off-leash dogs permitted in GGNRA?

SUPERINTENDENT DEAN: Well, in that particular zone, wherever, wherever it would be ' the seven zones or, the 21 areas that we studied ' they were all looked at specifically, so..

SUPERVISOR WIENER: And then, the next step is if there would not be 75% or higher compliance, could it then go to a ban on dogs in that particular area?

SUPERINTENDENT DEAN: Potentially, yes, if it was a, if it was a leashed area that, that was problematic, it would, the next level would be no dogs.

SUPERVISOR WIENER: So if this plan is approved, we could in the future have a situation where parts or potentially all of GGNRA would be totally off limits to dogs.

SUPERINTENDENT DEAN: That would be a worst-case scenario, but we don't anticipate that, given the level of compliance we're asking for ' we're asking for 75%, which is like a C-. We're trying to be as flexible as we can, as reasonable as we can. And again, we would, before we did any changes, we would be stepping up our education, our signage and our enforcement to try and advise people that there's a, there might be change in the offing, let's

get back in, in, into the good column.

SUPERVISOR WIENER: And how is the compliance gonna be measured? Because one could imagine a number of different ways that could lead to a lot of different results.

SUPERINTENDENT DEAN: We would, we would have a, a third party, institution develop the criteria and the, the, the system. We have not developed that yet, but it would be third party developed and peer-reviewed. And it would be very transparent. The public would understand, it would be posted on the website as well as, I envision, posting on the website the progress ' how, how are things going out there in each area?

SUPERVISOR WIENER: Has this been tried anywhere else in the park system that you are aware of?

SUPERINTENDENT DEAN: They've tried it in, in different forms. Adaptive management is a, is a tool that we use, often resource-based. Cape Hatteras National Seashore in North Carolina is currently looking at something similar where they have off-road vehicle use on the beach, for example.

SUPERVISOR WIENER: How about with dogs?

SUPERINTENDENT DEAN: No, I'm not familiar with a dog example at the moment, no.

SUPERVISOR WIENER: So it would be fair to say that it's perhaps difficult to predict what level of compliance there will be?

SUPERINTENDENT DEAN: Well we, we actually do have some sense of, from some of our wildlife observers that are watching the plovers ' they, they do see dog walkers and they do make, you know, occasional notations ' so we do sense, have a sense of how things are going at Crissy Field now. But we believe with education and cooperation that we can get there.

SUPERVISOR WIENER: And then finally, in terms of the overall, of the overall incidents that are reported in GGNRA from any cause ' the percentage that are attributable to dogs ' I think from about five years ago, there were statistics that about 7% were attributable to dogs?

SUPERINTENDENT DEAN: I'm not familiar with that number, but I'm I'm not.

SUPERVISOR WIENER: Okay.

SUPERINTENDENT DEAN: Yeah.

SUPERVISOR WIENER: Do you, do you know if there's any more, any current data about what percentage.. SUPERINTENDENT DEAN: We've, we've had a lot of Freedom of Information requests for data, so I know we're crunching some numbers now, and I do know that as a percentage, it's interesting because when you compare it with ' the analogy has been made, with people, people- related incidents and dog-related incidents ' given the one slide I showed, where we've had various litigation and confusion and no clarity about what the rules are ' the, the level of enforcement has been up and down because there's been different direction given to our field rangers and staff about what is the current goal or what is the mission or what is the priority. There is obviously officer discretion as well ' you know, if you have a, a dog off leash or a dog problem versus something more serious going on, you know, the officer is going to go with the more serious case. So it's hard to sort of use that as a, as a measure. But we, we are going to share the statistics as soon as we can, and we had to redact a lot of the names and so forth, but we are gonna be posting that on our website.

SUPERVISOR WIENER: And will that be posted before the rule making is completed?

SUPERINTENDENT DEAN: Yes, yeah, yeah, I think some of it's already up there, but more to come.

SUPERVISOR WIENER: Okay, thank you. Those are all the questions I have.

SUPERVISOR MAR: Actually Superintendent Dean, I just had a couple of questions about Ocean Beach. And could you walk us through the, what is a Snowy Plover area ' so the Western Snowy Plover, one of the federally threatened species ' and then also just let us know what, what data do you have of, reports of dogs injuring the snowy plovers and in general kind of, again, the rationale for balance, as you call it, with the critical habitat and the sensitive species.

SUPERINTENDENT DEAN: Okay. Snowy Plover is a shorebird that, that frequents Ocean Beach about 10 months of the year. It is also at Crissy Field. But at Ocean Beach, the area where the birds are is between stairwell 21, which is in the middle of Golden Gate Park, on the western end, down to Sloat Avenue, Boulevard, roughly, so that area is permanently, not permanently but currently closed 10 months of the year while the birds are present. We do have observers that, that, that monitor the birds occasionally. It's, it's not as robust as we would have in the future. And what they observe are birds being flushed by dogs that are running through the area off leash or jogging along. So, you know, I could, I could provide more information if, if

needed, but again it's, it's against the law to disturb wildlife ' that's one of the rules that we have in all of our national park areas, so..

SUPERVISOR MAR: And I guess the proposed plan would reduce, or actually the plan would create a seasonal leash restriction from July 1 to May 15? That would be the proposal? Is that, is that right?

SUPERINTENDENT DEAN: I think it's actually, we were proposing to go to 12 months at Ocean Beach.

SUPERVISOR MAR: So it's extending it a full year.

SUPERINTENDENT DEAN: Yes, again, it's one of those things where it's confusing to people ' you know, am I in the right month or not? And so, 10 months versus 12 ' that was one where we decided to just keep the area from the Cliff House down to stairwell 21 as a, is a permanent off- leash area and then 10, 12-month closure on the area south.

SUPERVISOR MAR: And then back to the Snowy Plover. I would be interested in the Audubon Society and the other groups' information, but the SPCA and others are reporting that there, there are no official reports of a dog injuring or killing a Plover in the GGNRA. Is that correct?

SUPERINTENDENT DEAN: I'm not aware that that's a factual statement, but I, I mean, I know that the birds have been disturbed by, by dogs on both Crissy and Ocean Beach, and they're an endangered, they're protected by the Endangered Species Act, which is a federal law that trumps our, our dog policy, quite frankly, at the local level, the park level.

SUPERVISOR WIENER: Supervisor Cohen, do you have any? Okay, thank you.

SUPERINTENDENT DEAN: Thank you. SUPERVISOR WIENER: Next we are going to hear from the Recreation and Parks Department. Ms. Ballard? Thank you.

SARAH BALLARD, DIRECTOR OF POLICY & PUBLIC AFFAIRS, RECREATION & PARK DEPARTMENT: Good afternoon, Supervisors. Sarah Ballard, Director of Policy and Public Affairs for the Recreation & Parks Department. I'm here today to give you some information on our off-leash dog areas and briefly discuss some of the impacts that we expect if this, the proposed management plan of the GGNRA goes into effect.

Like the Golden Gate National Recreation Area, our job as a recreation and parks department is to be good stewards of the land, and we, too, have some sensitive natural areas and endangered species on our properties. And also,

like the GGNRA, our job is to balance multiple users' needs to recreate and enjoy nature. So we absolutely understand where they're coming from and what they're, what they're trying to achieve.

Our commission ' I think you all have a copy of this map ' our commission has approved 28 dog play areas or DPAs, as we call them, throughout our system. And each one of these was discussed and agreed upon through a, a lengthy process through our DAC ' our Dog Advisory Council ' and brought to our commission and approved there. And each one of the, the dog play areas is supposed to have essentially a Friends group that stewards the dog play area ' makes sure there are bags there, kind of does informal enforcement, and generally creates a sense of community around the dog play area so that the rules are enforced. In all honesty, we've had sort of mixed results with that plan, but that was the approach when these dog play areas were, were formalized by our commission.

It is important to note that while we do have defined dog play areas, we do have the problem of people using areas that are not for off-leash use. As Supervisor Cohen knows, we just had this issue in her district of folks using an athletic field for off-leash dog use and causing some significant impacts on the field. So we, we do struggle to, to enforce our off-leash rules.

This is a, just a brief list of the ' which you can't see, I apologize [laughs] ' of the 28 off- leash dog areas. You'll see that they're spread pretty much throughout the city. That was obviously one of the considerations, is that people have easy access to locations.

And then I've included in here a map ' and I frankly probably should have overlaid both of them ' but a map of where the GGNRA's proposed changes are to be and where the restrictions would be. It's important to note that, again, like the GGNRA, we have many of the same challenges. Over 80% of our dog play areas that I identified in the last slide are also near sensitive natural habitat. So, that said, while we do have a lot that we ' a lot of concern that we share with the GGNRA, we do have some significant concerns about this plan, and I will just take you through those briefly.

Most importantly, I think, the study does not adequately speak to impact on lands outside of the jurisdiction of the Golden Gate National Recreation Area. As a department, we think that is problematic. It stands to reason that if you restrict access in a certain area of the city to dogs, they will necessarily go somewhere else, and it's our view that that somewhere else will be our parks, and will cause an additional maintenance burden and enforcement burden for the city. And as Supervisor Wiener mentioned, we had some anecdotal evidence of that with the tsunami closure of, of Ocean Beach last month.

The EIS ' the, the environmental study of the proposed management plan ' also references limiting the number of dogs that professional dog walkers are allowed to have with them at any time, and floats the idea of creating a permit program or training for dog walkers. The city does not currently have either of those, either of those things in place. And while they are ideas that, that have been discussed at a variety of points in time at our commission and elsewhere, it could be problematic if there were ' for, for residents and citizens ' if there are different rules in different jurisdictions. And so it is our hope that as a part of this, presents an opportunity for the department and the city to work, to continue to work collaboratively with the GGNRA to make any of those proposals as seamless as, as possible.

And lastly, as Supervisor Wiener just spoke about, the 75% compliance language presents some significant concerns for us in that if they do, if the areas do continue to progress into, from on leash, from off leash to on leash to eventually no dogs, I can imagine that the burden on the city properties would be even more significant.

I think our, our, our largest concern is at this point we don't have empirical data or a good way to help you as policy makers evaluate impacts on, on city land because the document didn't really study where ' their document didn't really study where the users are coming from, how often, how often they frequent the place, and as I said, the particular location, and as I said earlier, where they might go instead if, if the certain area that they tend to frequent is not available.

So that's a brief wrap-up of our concerns and I'm available for any questions.
SUPERVISOR COHEN: Thank you. Hi Sarah.

SARAH BALLARD: Hi SUPERVISOR COHEN: Okay, I was curious to know if, if you guys have ' you being RPD and the GGNRA ' have had any kind of a conversation about, to address your concerns.

SARAH BALLARD: We have. We have met with the GGNRA ' twice?

FRANK DEAN: Yes.

SARAH BALLARD: Twice about some of the concerns that we have.

SUPERVISOR COHEN: And were your concerns addressed? Did they answer them? Did they acknowledge them?

SARAH BALLARD: I would ' yes, yes. We have a, a long partnership and a history of working really well together. We share borders on a, on a variety of properties. I think the, the question for the city now becomes the process by which concerns are addressed and how, how we are comfortable with

when and how they're addressed. I would, I can let the superintendent answer that question, but I, I think he's pretty clear on what our department, what the concerns from our department are.

SUPERVISOR COHEN: Oh thank you, sure.

SUPERINTENDENT DEAN: What was the question?

SUPERVISOR COHEN: So the question, to just repeat it again, was ' I was curious to know if you had an opportunity to sit down with Rec & Park to talk, to discuss with, to discuss the addressing of their concerns ' concerns like impact on lands that are outside of your proscribed area.

SUPERINTENDENT DEAN: We, we did. And once, when the plan, we did speak to the city Park & Rec Manager and General Manager and his professional staff a few times, and most recently when the plan was about to be released, we did walk them through it. And we did talk about the, there was a concern that they raised at that point about potential impacts on city parks. At this point, you know, we don't have a lot of data and ' nor do they ' but it's somewhat speculative as well to say there's gonna be an impact. We don't know that, nor do they. But as I said before, we're willing to work with the city and our colleagues and try and, and sort that out.

You know, again, we're not banning dogs, we're still allowing them and we're just sort of putting them in different places or fewer places, but it, you know, Phil Ginsburg has told me as well that some of the dog parks are under-utilized, so I mean, I don't know if that's true, but it seems like there is some flexibility here and I think the city has rules in place, leash laws in place that we're now just trying to do ourselves, so it seems a bit awkward that, you know, we're being asked not to enforce rules that we have in other national parks, in other national park areas, and the city has those same rules, but we're not, we're being asked to stand down and not do that and manage our own properties.

SUPERVISOR COHEN: Thank you.

SUPERVISOR WIENER: Ms. Ballard ' in terms of the issues that have been discussed, are, is Rec & Park, are Rec & Park and GGNRA in agreement on those issues or is it an ongoing discussion?

SARAH BALLARD: I would, I guess I would say it's an ongoing discussion. We've had productive conversations around the idea of, as I mentioned, commercial dog walkers and the number of permits and the number of dogs they might have, that it probably makes sense for the city and the Golden Gate National Recreation Area to do something jointly. I think we continue to maintain that if this plan is implemented, there will be impacts on city parks, and remain concerned that their environmental

document does not study and quantify those.

SUPERVISOR WIENER: Thank you.

SUPERVISOR MAR: Yeah, Ms. Ballard, I was just going to ask you, that, let's see, it looks like the GGNRA plan would pretty much create off, eliminate off-leash dog areas in Lands End and Baker Beach, and the map that you gave us has the red areas, so it impacts a small part of my district, District 1, and Supervisor ' I guess it would be Mark Farrell's district ' the area that's along the Presidio, and I'm just looking at our map also of the existing Recreation & Park off-leash areas in the city. And I know that the GGNRA says that we have 30 off-leash dog parks and that we have more off-leash dog parks than LA, Boston, Chicago, Miami, Denver, and Sacramento combined, but still I could see the, the dangers of having more people in Mountain Lake Park, so that the, there's very few off-leash dog areas in the western side of the city; besides the two Stern Grove areas that you mentioned, there's only a couple in Golden Gate Park on the western edge, on Fulton and Lincoln, and then there seems to be one near the northwestern edge of San Francisco State near Lake Merced, but I'm just wondering, what do you think would be the impact on those west side areas with the proposal to eliminate off-leash dog areas in Baker Beach and Lands End.

SARAH BALLARD: That is probably the most significant area of concern, and I think you've identified possible impacts correctly in that Mountain Lake Park, the dog training area in Golden Gate Park, as well as Lake Merced could be heavily impacted.

I think the other thing that's worth noting, that we may want to look at, is from an environmental perspective: if users can no longer walk to locations near their house and they're actually getting in their car to drive to a location, to an off-leash dog area across the city or one that they, you know, a larger one ' McLaren Park has our largest off-leash dog area in our system. And if someone's driving across the city to utilize those, those spaces, then there's also an environmental impact there that's worth noting.

SUPERVISOR WIENER: Thank you very much. Next we will hear from Rebecca Katz, the Director of Animal Care and Control.

REBECCA KATZ, DIRECTOR, SAN FRANCISCO ANIMAL CARE AND CONTROL: Good afternoon, Supervisors. My name is Rebecca Katz and I am the Director of San Francisco Animal Care and Control, your city's open door shelter.

You will hear a great deal of testimony today about what may be lacking in the National Park Service's draft Dog Management Environmental Impact

Statement. You have and will continue to hear more about the prospective impacts on our city parks and the impacts on users of the GGNRA property. But I'd like to take this opportunity to address our concerns ' ACC's concerns ' about this plan as it relates to animal welfare more specifically. ACC is responsible for stray and unwanted domestic animals and finding them new homes, but we also provide rescue and facilitate wildlife rehabilitation for sick, injured, and orphaned animals throughout San Francisco. Accordingly, we are an advocate for dogs and off-leash play as well as for other animal welfare issues, including coexistence with local wildlife.

The National Park Service's Dog Management Plan for the GGNRA notes that the plan is designed to ensure the protection of natural, cultural, and recreational resources on that land. The primary supporters of that plan share our concerns about the impact on native wildlife. But the issue has come forward to the Board of Supervisors and other elected officials as a matter of choosing the side of dogs or that of natural resources ' either/or.

ACC does not view this as an either/or situation. We share the advocates' concerns about wildlife and other environmental impact. However, the EIS document presented by the National Park Service does not clearly demonstrate that the presence of off-leash dogs is the sole or even the primary cause of damage to native species. The EIS document lacks foundation or analysis about the cause of any impact. The mere fact of off-leash dogs being present does not lead to an automatic conclusion that those dogs have impacted an area that is also frequented by people without dogs or by people with dogs on leash, horses, hang gliders, the Park Service rangers' ATVs, or other predatory wildlife.

The National Park Service's conclusion that restrictions and a compliance-based enforcement that could ultimately lead to an outright ban on dogs being allowed on GGNRA property does not contemplate the urban environment in which those lands sit or the interests of the people of San Francisco and the Bay Area.

Moreover, the Preferred Alternative is overly restrictive, given that the National Park Service has not taken intermediate steps to educate the public and users about what is required for coexistence. In fact, most of that has been done by local dog organizations interested in preserving their access to off-leash areas.

It seems that the National Park Service has not considered various options at their disposal prior to implementing restrictions. For example, they could implement an adaptive management plan that might include signs, timed use, fencing, enforcement of laws or rules similar to our local pooper

scooper laws, licensing laws, or permitting options.

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

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

And I am available for questions as well.

SUPERVISOR WIENER: Any questions for Ms. Katz? Great. Thank you very much, Ms. Katz.

REBECCA KATZ: Thank you.

Correspondence ID: 4701 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: SUPERVISOR WIENER: We also have representatives from the Port of San Francisco. Ms. Bach?

CAROL BACH, ENVIRONMENTAL MANAGER, PLANNING AND DEVELOPMENT DIVISION, PORT OF SAN FRANCISCO: Good afternoon, Supervisors. My name is Carol Bach. I am an environmental manager in the Port's Planning and Development Division. And I came today primarily to be here in case there were any questions specific to Port parks and open spaces, but I'd like to offer that, some information ' that because of the nature and location of Port parks and open spaces, most of them are not significantly used by off-leash dogs or even to a significant extent by on-leash dogs. The exceptions ' there are two exceptions ' Warm Water Cove and Heron's Head Park, where there is more use of those areas by dog owners. And of those, only Heron's Head Park, which is on our

southern waterfront, just adjacent to the former Hunter's Point power plant ' only Heron's Head Park is governed by a policy prohibiting off-leash dog use, although with expansion of the park and construction of improvements, we are going to be this summer constructing an off- leash dog play area just outside of the current boundaries of Heron's Head Park.

Unlike Rec & Park, as I mentioned, our parks and open spaces tend not to be close to sensitive habitats. They're pretty urban areas, for the most part. Again, Heron's Head Park is the significant exception to that. But like Rec & Park we struggle with enforcement of the dogs-on-leash policy.

So, that's what I wanted to advise you. SUPERVISOR WIENER: Okay. We have two more informational speakers before, and then we'll get to public comment. Next I want to invite up Ken Weiner ' no relation [laughs] ' he spells it wrong, too [audience laughter], who came down today from Seattle. Mr. Weiner is a partner at KL, K&L Gates and is the founding chair of the environmental land use and natural resources west coast practice of that firm. He is the former Deputy Director of the White House Council on Environmental Quality and is gonna talk to us about the DEIS and NEPA.

KEN WEINER: Thank you. I represent Crissy Field Dog Group, which is a nonprofit organization dedicated to promoting responsible dog ownership and off-leash dog walking in GGNRA. Crissy Field Dog Group participates with SF SPCA and other community and recreational groups in Eco-Dog, a coalition of groups that advocate for responsible dog guardianship and environmental stewardship. And paralleling Michael's remarks, many of our members are also members of many of the groups he mentioned as they enjoy GGNRA now and hopefully for the future because of its natural values.

Our focus and the focus of our remarks is to try to depolarize issues and find ways to support GGNRA's mission to preserve natural and recreational values and scenic and cultural values unimpaired for current and future generations. And I, I'd like to, first we'd like to acknowledge the effort that GGNRA has put into this and the excellent introduction by Superintendent Dean at this hearing. These are difficult public lands management issues.

We think the city's and GGNRA's charters can help guide us. You all know San Francisco's charter ' it begins with a home rule goal, to "improve the quality of urban life." GGNRA was born from the simple logical premise that open space is vital to the San Francisco metropolitan area, that it's an essential ingredient to the quality and design of our urban environment. GGNRA, GGNRA was established by Congress in 1972 to meet the recognized need for urban recreation and for open space as the San Francisco metropolitan area was growing and becoming increasingly

developed.

The Park Service will tell you that it has to manage all units of the national park system consistently with its Organic Act to protect natural resources from impairment. This is accurate. And it's also accurate that it has to manage each unit consistently with the Congressional Charter for that unit ' in this case, the Golden Gate National Recreation Area.

President Nixon's message to Congress in February 1972 proposing the creation of GGNRA stated "This proposal would encompass a number of existing parks, military reservations and private lands to provide a full range of recreational experiences." Now when people like to cite legislative history, I like to go back to original sources. And when I was working on the President's 1977 environmental message and program, I happened upon, in John Erlichman's files, a copy of the original transmittal of the proposal for the Golden Gate National Recreation Area legislation to Congress. So this is from February '72, about 40 years ago. And in that transmittal, the Secretary of the Interior explained that while state and local governments have provided some open space, "the potential for park and recreational development of a much greater acreage should be realized in order to meet the demonstrated need for recreation space" and a variety of outdoor recreation uses.

I point this out because someone told you that the local parks are enough and that the purpose of GGNRA is to provide just natural areas. Clearly that was not part of the original proposal and intent for GGNRA. That original intent identified needs, noting for example that on the south side of the Golden Gate, this heavily used urban parkland, including Fort Mason, Gas House Cove, Crissy Field and Marine Green, Marina Green, and Congress's intent was stated in the 1972 bill reports for the legislation, that GGN, GGNRA "will ensure its continuity as open space for the use and enjoyment of present and future generations of city dwellers."

Well, dog walking is well known and recognized by Congress as part of this use and enjoyment. In describing part of the area in the city, the Senate and House reports both commented that the proposed area "will satisfy the interests of those who choose to fly kites, sunbathe, walk their dogs, or just idly watch action along the bay." The official legislative history notes, "The legislation will if enacted capitalize on the availability of this important unequaled resource in the San Francisco region by establishing a new national urban recreation area, which will concentrate on serving the outdoor needs ' [that is], which will concentrate on serving the outdoor recreational needs of the people of the metropolitan area. As an urban recreation area it must relate to the desires and interests of the people, but it must at the same time, as has been said, be managed in a manner which will

protect it for future generations."

These were also the city's understandings in transferring land to the GGNRA. As you may know, GGNRA has a mission statement which states the mission of the Golden Gate National Recreation Area is the preservation, unimpaired, of the natural and cultural resources and scenic and recreational values of the park for present and future generations to enjoy. And that is all we ask.

So in looking at alternatives, I'd like to just make a couple observations to share with you our conclusion that the draft EIS doesn't provide a solid technical basis for dismissing the No Action alternative when many areas under the current policy are working. And let me make a, just a simple clarification, which is ' the No Action Alternative does not mean do nothing, it's a, it means implement the current management plan. The current management plan calls for education, outreach, enforcement. It doesn't say do nothing, and, and that's important in thinking about the No Action alternative as not being a continuation of the status quo, but whether or not the status quo can be improved by doing better under the parks, under the Park Service's National Recreation Area plan.

You may know that the plan is being developed in the context of a larger update to the GGNRA management plan, so this is not just about dogs. If the current Preferred Alternative is adopted, based on the type of analysis in the draft EIS, it will reflect a larger direction on curtailment of recreational uses in the Recreation Area.

An EIS is required to examine the human environment. The federal NEPA rules define the human environment as "The human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." You know in your own CEQA documents, and in other NEPA documents in which the city has been involved, that it's typical to have a recreational section that looks at recreation impacts. This draft EIS has no detailed analysis of adverse impacts to recreation in the affected area, including indirect impacts and related mitigation measures.

In thinking of this definition, GGNRA's own legislative history and your own charter and their charter, one of the most remarkable statements in this draft EIS is "The quality of urban areas is not a significant factor in determining a dog management plan." As a Land Use Committee, you know better than most a good environmental design, just as you were hearing in recent presentations this afternoon, can solve many controversies that seem intractable, including how open space parks and trails are designed. But this is dismissed as not relevant in the proposed plan.

We don't disagree with the objective of clear rules and signs, of better compliance and of fewer conflicts, but the severe restrictions in the Preferred Alternative, though not a ban, are not yet balanced. In short, GGNRA has more work to do to examine all reasonable alternatives as required by NEPA, and we hope that you will encourage them to do just that.

So in conclusion, I'd like to emphasize that we really do appreciate the outreach by GGNRA at a series of public meetings on its plan and EIS. Those took a lot of organization and staff time, and regardless of whether people like the format of the meetings, there were a lot of thoughtful comments and suggestions that were made, and GGNRA staff say they are listening with an open mind. And we hope that's true because the draft plan and EIS didn't reflect a lot of the comments made in the scoping process earlier, and some of the comments ' thoughtful, non-ideological comments at these meetings ' were citizens asking about how the compliance-based program would work, how it would be measured, whether it's truly an adaptive management program, whether it will really involve reaching out for education and teaching people, as was suggested earlier by the superintendent, before tickets are issued.

Neighborhood residents suggested where separate access paths to a beach for dogs and people could easily resolve a longstanding problem area at Fort Funston and be designed to restore native species at the same time and blend into the natural environment. And people have suggested areas where they could walk their dogs just on leash, not even off leash, on a ridge top. Or in one of the most visited areas ' Crissy Field ' I heard people wondering why a former airfield would become off limits and suggest better ideas than closing 75% of the shoreline habitat, the shoreline area right now, even though it would be possible to protect the Snowy Plover habitat without compromising that.

So this isn't about environmental development, it's about meeting two environmental needs ' natural areas and recreation in an urban area, as ACC has said, and the Board of Supervisors hasn't been reluctant in the past to stand up for the needs and rights of its residents in the GGNRA. Some of you recall your December 2001 resolution when park management changes to the rules didn't adequately engage the community. Well this time, GGNRA is using the NEPA process to seek the comments of San Francisco and its citizens, and we appreciate their efforts, and we know it's not easy.

For the quality of the city, the quality of the environment, the quality of the neighborhoods and in short for the quality of urban life, as it says in the San Francisco charter, we ask you to ask GGNRA to take a hard look at the urban environment and become a partner with you and with us to improve its proposed plans so that both natural and recreational resources are

preserved.

SUPERVISOR WIENER: Okay, thank you, Mr. Weiner. [applause]. Okay, and then finally, before we ask for a response from GGNRA, we'll hear from Sally Stephens, who is the President of the Animal Control and Welfare Commission here in San Francisco. Commissioner.

SALLY STEPHENS, CHAIR, ANIMAL CONTROL AND WELFARE COMMISSION, AND CHAIR, SFDOG: Hi, thank you. Yes, as you said, I am the Chair of SFDOG, also the Chair of the Animal Control and Welfare Commission.

I'd like to say just real briefly, one comment is that in all the discussion about endangered species, there is no federally designated critical habitat anywhere in the GGNRA, especially for the Plovers or any of the other ' especially in San Francisco.

I think that there's literally thousands of people who walk every day in the GGNRA with their dogs, and it's probably the most diverse group of park users that you're ever gonna see. You have kids, seniors, gay, straight, disabled, every race, ethnicity, every social and economic class. We are environmentalists. We enjoy being out in open space with our dogs, as people have done for, for thousands of years. And we actually embody the Park Service's recently announced Healthy Parks Healthy People campaign, yet they want to force us out. At all the sites in GGNRA where dogs have been walked off leash legally ' and this was determined by two courts, that the '79 Pet Policy was a legal management [coughs] (excuse me), management tool. For decades vibrant social communities have grown and flourished. This is the human environment that Ken Weiner was mentioning just a minute ago. We see the same people the same time, whether it's rainy, foggy, windy, no matter what, and even on those rare sunny days in San Francisco. Friendships are forged and nourished, and in a city the size of San Francisco, community such as this is a precious resource. It should be encouraged, yet again this plan will essentially destroy those communities.

We've only ever been able to walk dogs off leash on 1% of the GGNRA land. That's important to remember ' 1% -- yet they now want to cut that by 90%. In San Francisco city limits, it's about 75% that they're cutting. It's Marin they're cutting more, in San Mateo there are basically no off leash [areas] whatsoever.

Normally when you make such a dramatic cut, you need really compelling reasons. And if you actually read through the 2400-page DEIS, there's nothing there, they're not there. There's, it's full of impacts that could happen or might happen but very little evidence that any of these potential impacts actually have occurred. And believe me, they've been looking for them. And

they don't see them.

If you read the DEIS and look at the reports it cites, it cites, and actually read the reports, you see that dogs have very little negative impact on the natural resources in the GGNRA, that dogs disturb wildlife less than people do, and that dogs pose no threat to the survival of the Snowy Plover. There's no safety issue in the GGNRA with regards to dogs. And as mentioned, people are involved in and cause 98% of the serious incidents that the GGNRA law enforcement data report. Dogs are only 2%. If there were these huge amounts of, of dog bites that people portray it as being, it would be in those reports. And it's not.

What are things that are not in the DEIS? There's no study of the impacts on city parks. They basically say well because there'll be some small area open for dogs at Fort Funston or Ocean Beach or Crissy Field, people won't go into the city parks. But the reality is that people will go into the city parks because those areas will become congested even in the GGNRA; when you force everybody into a smaller area, you're gonna get congestion. People are gonna move into city parks. And the city parks cannot handle that; they're much smaller. There's only 43 acres total of off-leash space in San Francisco city parks. And of that acreage, the Rec & Park's Natural Areas Program is calling for a reduction of 15%, so when the Natural Areas Program plan comes out in, sometime this year, we're gonna see a proposed reduction of off leash in city parks as well. It's gonna be, you know, it's compounding.

And just to give you a, a sense of that this isn't just dogs, the Coalition of San Francisco Neighborhoods at its March meeting took a position opposing the Preferred Alternative because it didn't look at the impact on city parks. And I think the fact that tsunami Friday happened right before that probably had an impact. There's no study 'as, as Mr. Weiner said ' there's no study on the impact on the human environment, social communities, human health, all those impacts. We know for sure, there's many studies come out that people that walk with a dog get more exercise than people that walk alone and that they actually lose more weight than people who walk either alone or with other people.

There's no study on the impacts of city animal shelters and on dog behavior. At the Commission in March, last month, we heard testimony from dog behavior experts and rescue groups that such a significant loss of off-leash access and the resulting overcrowding of city parks will lead to an increase in problem behaviors in dogs. To a person, well known dog behavior experts say that off-leash exercise creates better behaved dogs. Issues such as dog bites and aggression are far less common in San Francisco than nationwide, largely because there is so much off-leash access. Dogs are far more likely to display aggressive behavior towards other people and dogs when they're

on leash.

To quote Trish King from the Marin Humane Society, "It is very likely that behavior problems will increase dramatically if the amount of space dogs can use is reduced. This in turn may lead to the relinquishment of more dogs to animal shelters. The number one reason that dogs are relinquished, turned in to shelters, is because of behavior problems."

To quote Ian Dunbar, internationally known dog behaviorist, "There's absolutely no doubt in my mind that restricting off-leash areas for dogs will be a social, public health, and legal disaster for parks and cities." And I have given you copies ' oh, actually I didn't give them to you [laughs], I am now ' copies of the statements from various experts on dog behaviors. And these are basically nationally known experts. This isn't just, you know, some person just randomly thinking, this is people who's made their living out of studying animals and dogs.

Increasing the number of surrenders to shelters is a significant impact on the city. It's city resources at the shelter. We have tried to have a no-kill philosophy in the city, that any potentially adoptable animal is not euthanized at city shelters, but the more ' if you put more of them in to the shelters, it's likely some will fall through the cracks. That's, that has a significant impact on the city, and we don't want that.

The Commission voted 5 to 2 to recommend that the Board oppose the Preferred Alternative because it didn't look at these impacts on dog behaviors.

So why is there all these calls to restrict off leash. It's basically an extreme view of what an urban recreation area or an urban park should be. It's sort of like the idea that, it's like a museum where you look at things through, you know, from behind glass, glass walls or where things are all roped off, and you're, you're stuck on a boardwalk with a sign that says Do Not Enter, Do Not Go Here. It's a look-but-do-not-touch idea. We feel that urban recreation areas are for active recreation ' that's the reason it was created and that's what they should be for. In this densely urban Bay Area, our urban recreation areas are our backyards and our sandlot, sandboxes. The people who created the GGNRA understood; that's why there's so much in all the enabling legislation and the, and the hearings about preserving recreational open space.

We feel, as the creators did, that this is about sharing space, that people, dogs, and nature have coexisted in the GGNRA for decades and we want to see that continue to go for decades to come.

This is not a pristine wilderness. It's located within the city limits of a city of

800,000 people. Fort Funston has a missile silo under the parking lot. These are not pristine wilderness. Yet we're being told it has to be managed as if it, as if it was.

During Negotiated Rulemaking we were told by Barbara Goodyear, U.S. Attorney who advised the GGNRA in legal issues, that all units of the National Park Service have discretion in how they manage their units. For example, you can walk a, have a dog off leash in national preserves as long as they're hunting and killing animals. You don't manage Yosemite Valley with the expectation that people will have a solitary wilderness experience. Therefore, the assumption is, or, continuing that, is you don't manage the GGNRA with the expectation that people will have a solitary wilderness experience, yet that's what they're trying to do.

The, the ' we want to continue to share that 1% of GGNRA land on which we've ever walked our dogs off leash, and we basically want to keep the R in the GGNRA. I think that, that Superintendent Dean's comment ' we don't have a lot of data ' is telling because they're making radical changes in use of this area ' the GGNRA areas ' without having done the data and the work that they need to know whether or not they truly need to do one. They can't even give you statistics to tell you how many people are visiting the GGNRA any day, that sort of information ' how many have dogs, how many don't. Those are the types of things that should've been looked at before they even came up with this DEIS. If you have any additional questions, I'm happy to answer them.

SUPERVISOR WIENER: Any questions? Thank you, Ms., Commissioner. And then, before we get to public comment, if GGNRA would like to respond to anything? If ' you have the option now to do so. It's you're, it's, it's your decision. Okay, thank you.

Okay, we'll now go to public comment. So for those who are, you can, if anyone else has cards, you can bring them up to Ms. Somera here, who will hand them to me.

For those who have not done public comment before, here's how we do it. Everyone will have 2 minutes. You do not have to take the full 2 minutes [laughter]. We have a, I have a lot of people signed up and that's great. You can take the full minutes, the full 2 minutes, but you don't have to, and if you want to say I agree with what so-and-so says, that's perfectly fine as well. At, with, when you have 30 seconds left, there will be a very soft bell that goes off, and at the end of your 2 minutes, there will be a very loud bell that goes off, and that is your cue to, to finish up your remarks.

I'm going to call ' and again, I want to remind people, we please request no applauding, no booing, no hissing, nothing, just good old talking. And I'm

going to call up about 10 people at a time. If you're in the overflow room and you hear your name, just come on down, and then you can line up. And I would just ask that when you come up, say what your name is and then when the person ahead of you finishes, just come right up right away, you don't have to wait for me to call you so we can not have big gaps between people.

So we'll start with the following people, and I also apologize for butchering people's names, which I will do: Sandra Hazanow, Laurie Routhier, Lisa Kueukdogerh, Pam Hemphill, who is also a commissioner on the Animal Control and Welfare Commission, Jan Blum, Arthur Feinstein, Feinstein from the Sierra Club, Amy Meyer, Mayer, Neil Desai, Cheryl Traverse, Vicki Tiernan, Andy Moore, and Carol Arnold. So, Ms. Hazanow.

SANDRA HAZANOW, DVM: Thank you, Supervisors, for this opportunity. I am Sandra Hazanow. I'm a veterinarian and I'm the President of the San Francisco Veterinary Medical Association. I come here today as an individual and not as a representative of the organization because I have not been given permission from the organization to speak on their behalf. We didn't actually bring it up.

If you can bear with me, I kinda want to take this issue to, to something that Sally had just mentioned. And it's about the behavioral perspective. In my 20 years as a veterinarian in San Francisco and surrounding communities, I've noticed an interesting thing: I think it's a pattern that's associated with socialization ' the dogs in San Francisco that I treat have to be muzzled far fewer times during regular routine handling than the dogs in surrounding communities. I think this, this lends itself to, clearly to an understanding that the dogs are much better socialized, more trusting of people, and thus less aggressive. They're less fearful of routine handling and much more amenable to living as happy healthy animals within our communities.

Interestingly, I was thinking about this on my way over ' even within the city I've noticed some differences, and those areas very close to the Presidio, where I practiced for 10 years ' the dogs there are super friendly, they all go to the park, they all go to Presidio, they all go to Crissy Field. And where I currently practice ' not so much. Many of the dogs are little bit restricted, their behaviors are a little more restrained, and they are cautious. So, so even for like the happy-go-lucky hound, leash restriction can actually cause problems. Many of these dogs can develop a problem that was mentioned, called barrier frustration, and dogs that don't have the opportunity to behave as normally as they would if they're [bell] roaming freely..

SUPERVISOR WIENER: Thank you. SANDRA HAZANOW: Anyway, so in summary I think that the proposal to restrict the ' that's 30 seconds, right?

[referring to bell]

SUPERVISOR WIENER: No, that was the 2 minutes, yeah.

SANDRA HAZANOW: Okay, sorry. I thought that was the soft one. I apologize.

SUPERVISOR WIENER: Yeah, so, thank you very much. Next speaker.

LAURIE ROUTHIER: Hi, good afternoon, Supervisors. My name is Laurie Routhier and I am the director of the animal shelter at the San Francisco SPCA and additionally have served, served for years on our city's Dog Advisory Committee and the Negotiated Rulemaking committee for dog management.

And I would like to say thank you ' thank you for working to improve the GGNRA's proposed plan so that it both protects the natural resources and the recreational values of our city. Their plan is overly restrictive and it represents a major departure from the established balanced use of parklands that's prevailed for over 40 years. There's really plenty of space for balancing the needs of a diverse populace and with good park trails and, park management and trail management, the diversity of experiences can be preserved.

By vastly off-leashing [laughs] ' off leashing! I'm sorry. By vastly reducing off-leash recreation in the GGNRA, that'll have a negative impact on tens of thousands of dog guardians and of course, as has been mentioned, also the behavioral health of dogs. We know that people and dogs really have the, get the same benefits from playing outside and exercising. And in my position at the shelter and as a former dog trainer, I know how vital it is that dogs get off-leash play. It's been mentioned, and I think it's particularly important to recognize that currently less than 1% of the GGNRA's lands are available for off-leash activity, and this would reduce it even further. And with 76,000 acres being discussed, there's plenty of space for us to find a balance. And really neighborliness is a lot more effective than, you know, setting up battle lines. I think that we have a lot of opportunity to educate our community, put up some better signage and fencing and so forth to reach the goals.

Thank you.

SUPERVISOR WIENER: Thank you very much. Next speaker.

LISA KUEUKDOGERH: Good afternoon, Supervisors. My name is Lisa Kuekdogerh. I am disabled and I do not have a dog. Last year I had to undergo grueling medical treatments. I am weak and even coming here to

comment is an effort. I am grateful for getting the chance to speak.

For both my mental and physical health, I made a point to visit Fort Funston when I could. I knew getting out of my social isolation was essential. I knew watching dogs play would bring me joy. I knew encountering the occasional extraverted dog would give me the chance to pet a dog and get a few face licks.

My medical team told me I had to start walking as often as I was able. Given my physical state and being a woman, I wanted to be safe. Fort Funston with its open air format and the natural comings and goings of people and off-leash dogs was the perfect match.

After not showing up at the Fort for a few days, a voice called out to me: How ya doing? Haven't seen you lately. I was surprised and had no idea who was talking to me. She was a professional dog walker. I quickly learned there was a vibrant social community at the Fort and that I was welcomed into it. She continued to keep tabs on me, and does to this day. She has driven me to doctors' appointments and surgeries. She has become a vital part of my social support network.

I have never encountered a more cohesive, caring, and self-policing community. I have met other disabled and senior folks who visit Fort Funston, and for many of the same reasons I do. One woman told me she knows if she collapses on the trail due to her health condition, as happened to her once before, she and her dog will be taken care of by the people there.

Finding this community has been essential to my well being, and I don't want to see it disappear. This is the Fort Funston I have come to know and I wanted you to know about it, too. Thank you for your time.

SUPERVISOR WIENER: Thank you very much.

CHERYL TRAVERSE: Hi. My name is Cheryl Traverse and I'm here representing senior citizens who own dogs. And I went to Fort Funston yesterday and just kinda took a little snapshot of what was going on. This was a Sunday, nice day in the park. [referring to slide] Here's my vicious Schnauzer. You'll notice most of the people are walking on the path. There's not many people off the path at all.

Here's another view. You see most of the people walking on the paths, not off the path. Here's a place down near the Snowy Plovers. Notice that the fences are not up and active. There are no signs warning you not to go off the path. But still, most of the people are on the path, all the way up to the top of the hill here.

This is how we recreate when we have dogs. And when we're seniors, we need the 40 minutes of work to get us down to the, to the bottom and back, to live a long healthy life. Here's another view that'll give you an idea.

So I just wanted to say that, you know, if it's not broken, don't fix it. I mean, where is the data that this is wrong and not good? There's nothing here going on that would be impactful to the, to the environment. There aren't even signs and fences. I've been doing this for 25 years, walking over here. They took the fences down saying this is a habitat ' that's gone now, I think because of the sewer project ' the, the, the pipe that's being built there. All the fences and the don't go here, don't go there.

So I just wanted to educate people on what recreating with a dog is, and that, the fact that, you know, it doesn't look very dangerous to me.

Thank you.

SUPERVISOR WIENER: Thank you very much. Next speaker.

CAROL ARNOLD: Good afternoon. My name is Carol Arnold, I'm a third generation San Franciscan, a long-time environmentalist with membership in Defenders of Wildlife and the Nature Conservancy among other groups. I'm now retired, but my entire career was devoted to conservation and restoration of California's natural resources. I also served on the GGNRA Negotiated Rulemaking Committee and the Natural Areas Plan in regard to ' the city's Natural Area Plan, in regard to dog policy.

I'm here to voice my opposition to the Preferred Alternative to, of the GGNRA's EIS on this proposed Dog Management Plan.

It's been my experience working in conservation for many years that dense urban areas like San Francisco are not where cash-strapped resource agencies should be devoting most of their limited resources. We all know that people in all their diversity and pursuing all their various activities, recreational or otherwise, impact the natural environment ' wherever they are.

Because of this, agencies should focus their efforts on making the urban environment as enjoyable a place to live for as many people as possible in order to avoid the much greater impact that occurs when residents, feeling the pinch of restrictions, flee to the suburbs or rural areas, where natural habitats are significantly more intact and therefore more vulnerable.

GGNRA's proposal will leave a miniscule one-tenth of 1% of lands managed by them available to off-leash dog walkers. This is not only in direct violation of the 1979 Dog Policy in effect when the city-owned lands

were transferred to GGNRA, but is blatantly unfair and will create a huge enforcement problem for the city when numerous dog owners arrive to walk their dogs in city parks.

I urge you to do the right thing and vote to approve the resolution before you today. And thank you so much for allowing this true public hearing, which was denied to us by the GGNRA.

Thanks.

SUPERVISOR WIENER: Thank you. Next speaker.

VICKI TIERNAN: Good afternoon, Supervisors, and thank you so much for this hearing. My name is Vicki Tiernan and I just wanted to speak a little bit about the history over the last 10 years.

In 2001 the Citizens Advisory Commission sat poised to, to eliminate the, the 1979 Pet Policy entirely. The Pet Policy was derived as a result of extensive public hearings. It was not just decided upon by the, the Commission from thin air. The, over 1000 people showed up to protest that, including 9 of 11 of your predecessors on the Board. The vote was not taken that, that night, but subsequently the Park Service announced that the '79 Pet Policy had never been valid, and they started putting up leash signs in the places where off-leash dogs had, had traditionally been allowed.

This went on ' people were getting tickets just for having their dogs off leash in the, in the legal areas, until 3 people fought their tickets and a District Court judge ruled that in fact the 1979 Pet Policy was a legal policy and is the operative policy.

I'm talking about all of this to point out that there's a pattern here: there's very strong motivation on the part of the Park Service to eliminate dog walking entirely in the GGNRA.

There was also a push within Congress, to get Congress to actually remove the word Recreation from the title of the park and call it the Golden Gate National Parks, ostensibly for fund-raising purposes, but if you do a little research you'll find that the Parks Conservancy does a whole lot better already with fund raising than other areas.

I urge to take a, the strongest possible stand against the Park Service's actions on this. Thank you very much.

SUPERVISOR WIENER: Thank you very much. Next speaker.

ANDREW MOORE: Thank you. My name is Andrew Moore, and I want to

thank you for having this hearing. Thank you.

I have lived in Bernal Heights area of San Francisco for over 35 years. I am a senior, having recently retired from my career as a building contractor. I am a passionate environmentalist and also a dog owner. I have always enjoyed the fact that San Francisco is considered a dog-friendly city. For all the years I have lived here, I have hiked with my dog at least twice a day. This is my primary form of recreation and I enjoy it immensely.

The GGNRA now proposes to cut back areas open for dog walking even more than they already are. I strongly object to the Preferred Alternative of their Dog Management Plan and just as strongly request that you support the resolution before you today.

One other thing that I'd like to say ' this is not Yellowstone. This is not Wrangell-St. Elias in Alaska. This is 49 square miles of highly dense urban area with small park area attached to it. Thank you.

SUPERVISOR WIENER: Next speaker? You can just come on up, yeah.

MALE SPEAKER: Hi, my name is ' thank you, Supervisors, for putting this together. We really appreciate that. I'm a long-term San Francisco resident. I've been here for 30 years. I'm a third time property owner here and a first-time dog owner for about the last 6 years.

And I'm really concerned about limiting the amount of space that we get at GGNRA. I take my dog, my service dog, Molly, with me virtually everywhere I go. I have, I do two trips a day, usually to Dolores Park or maybe one trip to Dolores Park and then to Baker Beach or to Ocean Beach or to Fort Funston. And those are some of her favorite playtimes, and the times when she gets the most exercise and the most fun. And my tax dollars are at stake here. That's part of what I pay taxes for here in San Francisco. And believe me, I pay a lot.

And that's all I have to say. Thanks very much.

SUPERVISOR WIENER: Thank you very much. I just want to acknowledge that Supervisor David Campos has joined us. Welcome, Supervisor. Next speaker.

JAN SCOTT: Hello, my name is, is Jan Scott and I live in the Sunset District, and I've been taking my dogs and children to Ocean Beach and Fort Funston beaches before the GGNRA was even involved in the situation. Three to four times per week for the past 30 years I've jogged on the beaches with my various dogs. This is my most important recreation and

probably most days my most pleasurable activity.

I'd like to use some time to address the question of the ACC Commissioners about why people go to the GGNRA instead of using our, our city parks. And from, my particular reason is that our city parks for the most part are fairly small. They're little areas, maybe at the most a quarter or a half a mile long, so it's difficult to get a long jog in, in those areas, unless you just want to just run around in a circle, whereas the GGNRA has long places where you can go for a long distance. So that's my reason for it.

To continue with what I prepared here ' those of you who visit Ocean Beach and Fort Funston probably know that it's really foggy and windy about 90% of the time and it's usually used by primarily dog walkers ' people with their dogs ' especially Fort Funston, and then a smattering of other types of walkers and joggers, fishermen, surfers, people like that.

My concern is, is that when we have to leave and go to the city parks, the, Fort Funston will be empty. And so we'll have the opposite problem as they were describing, where we have these big empty beaches and then just a mile or two away we have crowded parks. And in my opinion, that is just a really ridiculous use of resources.

So I really urge you to pass this proposal and I [bell] hope you will come up with a more wholistic approach. Thank you.

SUPERVISOR WIENER: Thank you very much. Next speaker?

EMILIANA PUYANA: Hi, thank you for taking my comment. My name is Emiliana Puyana. The proposed changes to the GGNRA would affect my life at many different levels ' first, at a personal level, I will no longer have a place to adequately exercise with my dogs. At a business level, my dog walking business would be severely affected and my livelihood would be in great danger. As a responsible member of the San Francisco community, I am deeply concerned about the proposed changes. I don't even want to imagine [what] my day-to-day life would look, would look like if I don't have the ability to go to the park and exercise with my dogs.

I think it's important to mention that we are talking about 1% of the GGNRA. It's a very small sacrifice to make that ensure that, to ensure that thousands of people and their dogs have a safe place to exercise.

We have a responsibility to our dogs. We need to provide adequate space for them to exercise. We also, however, have a responsibility to preserving the natural part, the natural parts in the national parks. That being said, I believe that we can come up with a better solution, one that serves everyone.

The gentleman from the GGNRA mentioned that the remaining off-leash areas would be large. That is simply not true. The Preferred Alternative leaves very, very small areas for us to walk our dogs. If you take into account the number of dogs that, that frequent places like Fort Funston on any given day and the area that they're gonna allow for off-leash areas, once you put that large number of dogs 'hundreds of them' at any given time into these small areas, the incidents, the incidents related with dogs and people and dog on dogs, are bound to go up, there's just no other way to look at it.

With regards to the Snowy Plovers, you know, I, I have seen dogs chasing them at the beach and they do fly away, but I will say for me, I am a runner and I go for [bell] on Ocean Beach, and when I run by the beach, the birds also take off. SUPERVISOR WIENER: -Thank you very much. Next speaker.

NATALIE TONDELLI: Hi. My name is Natalie Tondelli and I wanted to say a few things. I'm pro-environment, pro-dog, and pro-human. As a professional dog trainer and dog walker I've utilized, valued, and respected the current GGNRA off-leash areas for the past 7 years. I cannot stress the importance of combating dog behavioral issues by exercise, socialization, and exposure that only off-leash play can give.

By adopting the policy, it is inevitable that the congestion on the trails will end in the elimination of off-leash recreation for all dogs, based on the compliance ruling.

It is baffling that in a time of severe budget crisis, we are pouring so much money, time and effort into an inflated proposal that seems to be based on a lack of scientific evidence. The GGNRA proposal takes no account of the human impact in these areas, like running, people's garbage, cigarette butts, the impact of other animals, and even just the smell and threat of humans to other small animals. Or the erosion of soils.

All responsible dog owners and dog professionals are in favor of permitting dog walking off leash and collecting revenues and fees. We need to have a balanced and fair proposal for San Francisco city parks as well as the GGNRA. The already tiny 1% of legal off-leash areas in GGNRA is to encompass everyone and their activities.

Thanks.

SUPERVISOR WIENER: Thank you.

ANNE DUFRANE: My name is Anne DuFrane. I live here in the city, over off the Embarcadero, just off the Embarcadero, and I would 'I'll introduce

my dog, Franklin, a service dog, who is with me.

I would like to concede my time to Carol Kucera. We've shared our views extensively and she can speak much better to all issues than I can. Thank you very much.

JUDY KUCERA: We just met. My name is Judy Kucera, and I'm further down on your list. I'm a recent dog owner. We got a rescue dog, who is 18 months old ' my husband and I ' a year and a half ago, and it was a revelation to me to see how much was available to us as elderly dog owners with our young dog.

Primary to that was the socialization, which occurred taking our dog to Fort Funston, where she was able to interact with dogs and people, and thanks to a lot of training both from ourselves and our friend, Ruth Jensen, who is a dog walker here in a city, and a certain amount of dog training from Bob Gutierrez down on the peninsula, she's turned into a wonderful, calm, social animal. Not that she wasn't pretty good to begin with.

Anyone who's been in Central Park in New York in the spring recognizes what happens when you confine too many dogs in too small an area. The smell of urine is overwhelming as that snow melts. And my fear about San Francisco, where my dog and my husband and I have roamed in city parks and in the GGNRA, is that by, by having such a drastic reduction of open space available for off-leash dog walking, you're going to be creating terrible problems because my understanding is, there are at least 100,000 dogs in this city.

The positive effect of having dogs in, or at Fort Funston are that I have never seen a homeless encampment, which I have seen in other parts of the city, and I've seen my dog playing with the ravens, whom I hear are attacking Bank Swallows ' I heard that from the GGNRA ecologist ' as they peak their little heads out of the nest.

So the GGNRA has a huge number of problems, and I think this is the least of their worries. And I really think that the Board of Supervisors has done a wonderful job in stepping in and stepping up to the plate. [bell] Thank you.

SUPERVISOR WIENER: Thank you. Next speaker.

JUSTIN HANZEL-DURBIN: Hello, my name is Justin Hanzel-Durbin. I'm a San Francisco resident out in the Sunset. I'm also an environmental engineer. And I just wanted to thank you guys for giving us this opportunity to actually speak about this. Public, public comment wasn't really being taken in a forum like this at the other meetings.

I've taken a pretty broad look at this document, in more of a scientific look, as far as environmental impact statements go, and I find it totally deficient in scientific data. I don't see the normal scientific data that's in these sort of reports. There's not very many studies that are actually in the document or, there's no baseline from what I can tell that was taken by the National Park Service here, to truly gauge where we're at.

You know, if, if they were going to enforce the laws and the regulations that are currently in place, then I think we'd have a totally different starting point from what we're looking at in this report. And I think until they actually enforce the rules that are in place, then we shouldn't even have this report.

So I'd truly encourage you guys to pass this resolution. Thank you very much.

SUPERVISOR WIENER: Thank you. Next speaker.

LINDA LITEHISER: Hello, Supervisors. Thank you for having this hearing. My name is Linda Litehiser.

SUPERVISOR WIENER: Can I ask you, ma'am, if I could just call more names.

LINDA LITEHISER: Yes, sure, sure.

SUPERVISOR WIENER: My apologies for interrupting you. The following should line up: Reid Reichardt, Kathy Mok-Reichardt, Andrea Buffa ' who I think may have spoken already ' Samir Ghosh, Angela Gardner, Linda Gulandis [ph], Steven Krefting, Ilana Minkoff, Judith Kowena [ph], Jean Kind, Joan House, Willa Hegerty, Renje Pittin, Amber Westbrook, and Becky Evans. Thank you, I really appreciate it.

LINDA LITEHISER: Thank you. Thank you, Supervisors, for having this hearing. I'm Linda Litehiser. I'm a 42-year resident of San Francisco. I'm also a home owner, a dog owner, and an active advocate for our city parks. I'm also very supportive of environmental issues and have been all my life, but I'm very worried about the proposed, proposal by the GGNRA to limit dog use in the park.

I'm here to speak on behalf of my family ' my husband, my children, my grandchildren. I want to stress that dog play ' off-leash and on-leash activities ' are very much a multi- generational activity. It's what binds families, it's what brings us to our parks in many cases. It certainly is in mine. I also wanted you to know that we proudly show off San Francisco's dog play areas and the GGNRA areas to our out-of-town guests. People are just amazed that we have this ability in our city to show this kind of

recreation as, as such a wonderful, happy family and, you know, recreational activity. They just don't see it in other parts of the country.

It is such a beautiful thing when you go into the parks and you see families ' people of all ages, all cultures ' mingling together, with their dogs, dogs of every stripe. It's, it's a wonderful thing.

I also wanted to just stress what other people have said. Golden Gate National Recreation Area is a unique urban park. It's the urban area that we want to combine with all these other recreational activities, so we need this for our people, for our sanity, and for our health. Thank you.

SUPERVISOR WIENER: Thank you very much. Next speaker, please. And if the speakers want to all move up a little more? That'd be great. Thank you.

GEORGE PAPHITIS: Hello, my name is George Paphitis. I'm a 30-year resident of San Francisco and as we all know, the GGNRA controls virtually all our access to the waterfront of the, of the city, so I'm very concerned when 90% of the 1% of the lands allotted to off-leash area, is being restricted. And I figure that this is hardly a balanced approach. And I would strongly support your resolution, Mr. Wiener, for a re-examination because I don't think the data is there to support such restrictions and I think it should go back to the, the cooking pot and come up with a better solution. And that's all I have to say. Thank you.

SUPERVISOR WIENER: Thank you very much. And before we have the next speaker, I just want to, Supervisor Campos wanted me to convey that he has serious concerns about the GGNRA proposal. He's not allowed to come up here because he and Supervisor Cohen constitute a quorum of the Public Safety Committee and that could be a Brown Act violation, but he did want me to convey that.

SUPERVISOR COHEN: Sorry.

SUPERVISOR WIENER: Next speaker. MALE SPEAKER: I'm a research scientist actually in San Francisco. I spend a lot of my time in the lab. They don't let me out often. Now that I am out, I'm shocked and appalled at what the, some of the people in uniform behind me call the science. Using and abusing data is appalling. I think that's how this country gets in trouble, that's how we got into Iraq ' weapons of mass destruction, woo! [laughter] And I, I just fear that now we're looking at dog of mass destruction ' if you believe these people, they say that dogs kill birds, dogs injure people, dogs do all sorts of horrible things, and they've admitted at the same time there's no data for that. So I think we should take this entire plan, throw it out, let's

look at some real data.

Maybe we'll find something else that, that helps our birds even more ' maybe that dogs are helping the birds by scaring away the cats. After all, I think there's probably more scientific data that shows that cats do indeed attack birds. We don't have any data that shows that dogs attack birds except for anecdotal data with no witnesses.

I do think it's time that the federal government maybe stop using and abusing scientific research. I have a lot of confidence in the woman who was here earlier from Rec & Park. It sounds like people from San Francisco really know how to manage things in San Francisco. Maybe we let Rec & Park take over Crissy Beach and Ocean Beach; I think we, we'd all be a little more satisfied with, with local presence and see how they would do it. If in fact there are such grave problems with the Golden Gate National Recreation Area, maybe it's time for some change after all. Thank you.

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

Samir is going to help me with the slide show because lots of folks sent us pictures of people recreating with their dogs in the GGNRA and it's such a diversity of people, I think it's amazing to see. Let me just forward it.

But I just want to speak to why we should pass a resolution. First, I think we need to make the GGNRA take our concerns more seriously. It's not like our resolution is going to stop them from moving forward. They are moving forward. But I get, I'm afraid that they think we can do our rallies and submit our comments and then they can just keep going, but if the city goes no, this is not okay, they'll take that more seriously. I think we need to get the city officially involved in the NEPA process by formally submitting a comment. I think that you passing a resolution will help our federal, federal representatives to get involved. The GGNRA is part of the National Park Service, which is a federal entity, but if we can go to them and say look, the city of San Francisco is taking this very seriously, we need you to take it seriously as well.

I also think we should pass a resolution to acknowledge our community and the impact that this gonna have on our community, to reject the idea that it's dogs versus the environment and to insist that there's another way and we're San Francisco and we can figure out what that way is. I think we need a resolution because we need to tell the GGNRA that you can't just slap together a bunch of data and then make a recommendation that isn't actually

supported by the data. That's not okay.

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

Correspondence ID: 4702 **Project:** 11759 **Document:** 38106

Received: May,31,2011 00:00:00

Correspondence Type: Letter

Correspondence: SUPERVISOR WIENER: Thank you very much. Next speaker.

ILANA MINKOFF: Hi. My name is liana Minkoff and this is my service animal, Lucy. Until 4 years ago, honestly, I really didn't like dogs. I've lived in the city for 11 years and my solution was to go to places where there weren't dogs. It wasn't that hard to find ' there's plenty of it.

I had a change of heart 4 years ago when I got very, very ill and started developing panic attacks as a result of my illness, and my friend's dog was what saved me from these panic attacks; on a regular basis at all hours of the day and night, she'd come over and her dog would sit with me and just lick me and lick my face and make me feel better.

And so I decided, as I was starting to get to a point where I needed to get out the house more, that I would get a dog. And I'll tell you, this has been the best addition to my life. I have not had one panic attack since I've had her.

One of the reasons that, one of the ways that I am able to have her with me all day is that every day we get up and we go run around off leash for at least 45 minutes. We go to Ocean Beach and we go to Crissy Field, sometimes in the morning, sometimes during lunch. We prefer to go to the beach because the dog parks are too overcrowded at lunch time.

2:00 to 4:00 PM, which is when they showed the pictures, is when the dog walkers are taking the dogs back home after their lunch time walks [laughter]. If you go to the dog parks between 11:00 and 2:00, it's sometimes so crowded, it's not comfortable. We go to Douglas, we go to Corona Heights, we go to a lot of places, and I'm telling you, it is just packed. Those pictures are totally accurate for 2:00 to 4:00 PM, but not for the rest of the day, which is why we choose, choose to go to the beach, so she can run up and down the beach, get her energy out, and do this for the rest of the day. She's been sitting in here for over 2 hours, calm. She's a little dog ' they have a lot of energy.

At any rate, I am also curious to know ' it's been said many times today ' that

our city has more acreage than any other city, for dogs ' how many more dogs do we have than all these other cities combined as well? That would be my big question, so if you could please research this issue thoroughly and support the resolution to oppose the GGNRA, both Lucy and I would really appreciate it.

SUPERVISOR WIENER: Thank you very much. Next speaker.

WILLA HEGERTY: My name is Willa Hegerty. I am a dog owner and I am 13 years old. I joined this, I'm commenting because I think this is an important issue that should be discussed by young people.

My dog and I visit Fort Funston at least 4 times a week. If you take away these places, there will be nowhere else to go. There will be chaos at neighborhood parks and, and [there] are other ways to help the environment.

The Western Snowy Plover needs protection, but there are other ways to protect the, the species. Certain areas should be put aside for their habitat, and I acknowledge that there should be certain rules put in place.

They say they need to, the GGNRA says they need to protect the areas for future generations, but Fort Funston holds clean-ups frequently and I pick up my dog's feces and I help the environment. Why should I be punished?

They say "The plan is to improve visitor and employee safety and reduce user, user conflicts." I predict, with research to back up my prediction, that dogs will be aggressive and have behavior issues. Dogs will not be socialized. This will increase user conflicts and there will be more accidents in the GGNRA.

It affects me because I will not get enough exercise, my dog will become unhealthy and will not be socialized, my community will be, will be overcrowded. The Bay Area, in the Bay Area one in three houses holds a pet. Where would these pets go?

And the DEIS is full of things that could happen. They don't have any proof these statements are true, so I suggest the next time the GGNRA wants to put out a draft plan, they do their homework before. Thank you.
[laughter/applause]

SUPERVISOR WIENER: Thank you very much.

FEMALE SPEAKER: That's a hard act to follow. [laughter] However, I want you to imagine this scenario: you're buried under a rubble of a, of an attached building or an avalanche. Everyone has forgotten about you. Suddenly you hear a whimper or you feel a cold, soft nose. What would do

for that animal who came to your, to your aid?

I just want to read you a list of some of the things that dogs do for us: Canine Corps, police dogs, service dogs, search and rescue, avalanche dog, cadaver dogs ' and must I remind you that they were the unspoken heroes of 911 ' drug dogs, TFA, cancer detection, seizure detection, dogs to read to. Dogs have changed human beings' lives. We domesticated them; we must take care of them. Dogs need to run free and be dogs. And that's why we need to have a large area.

All life came from the sea. That's why I like to take my dog to Fort Funston. I feel rejuvenated by the salt air, by the, by the people and the wonderful dogs around me. I get exercise. I wouldn't go there if it weren't for my dog.

And I also want to point something, a couple of other things out to you. First of all, I want to point out that we have rules called no age discrimination and the ADA. The rules that let us walk our dogs in Fort Funston say that we may walk our dogs off leash only at the beach. I don't know about the rest of you, but I had a knee operation 10 years ago. I can't get down that sliding path to the beach. That's discrimination. There are seniors who meet every morning at Fort Funston. They can't get down to the beach. Let us mingle with everybody else, enjoy the bluffs where no one else will be, there aren't Snowy Plovers nesting on those bluffs at Fort Funston. And I'd like [bell] that if dogs have to be restrained, let's restrain children. [laughter]

SUPERVISOR WIENER: Thank you. Next speaker.

SAMIR GHOSH: Hi, my name is Samir Ghosh, I'm a San Francisco resident, District 8 resident. Thank you very much. I wholeheartedly support Supervisor Wiener's resolution opposing the NPS proposed GGNRA dog plan, and I don't know how you listen to all these comments. Thank you very much. In spirit of minimizing repetition, I support Sally Stephens' comments wholeheartedly as well.

A couple of things I will reiterate ' that dogs are not off leash because they are well behaved, they are well behaved because they are off leash. This issue is not about dog right side versus Snowy Plover rights. This is about dog owner rights. One-third of San Francisco households have dogs. Limiting to tiny dog parks is a back-of-the-bus segregation, in my opinion. Dog owners' own recreation is limited by the limits on the, on their own dogs. I don't have time to do both ' take my dog to a dog park and then go do my own exercise somewhere else.

And then ' 1% again I know has been said, as far as the GGNRA parks for off leash; I think it's worth stating again. I don't understand why Snowy Plover proponents don't suggest that we take another 1% of the GGNRA,

GGNRA parks and allocate them to non-humans. Their recreation is, is, you know, they're supporting their own recreation.

And also I'll state that dog owners are not against wildlife. On the contrary, I think pet owners are far more connected to and empathetic to animals than non pet owners, because of their connection to their pets.

NPS also does have the, the authority to manage different than Yellowstone, they have their section clause, clause 7 that allows them to do that. I also question NPS motives when they're using, continue to use Golden Gate National Park as the name instead of the Golden Gate National Recreation Area, which was declined in 2008.

One other quick thing is that dogs, the Dog Plan's No Action option is misleading; it in fact still includes the compliance management, which would potentially lead to a total ban. They do not, and it's also one-directional ' they offer no way to go backwards to get additional rights; once you lose the rights, there's no way to get them back. [bell] Thank you.

SUPERVISOR WIENER: Thank you very much. Next speaker.

MALE SPEAKER: A year ago I adopted a dog, who turned out to have some serious behavior problems, including, including severe anxiety. I thought I may have to give her up. I was informed by professional trainers that vigorous exercise and socialization were important keys to resolving such issues in dogs. Sure enough, places like Fort Funston and other off-leash areas have been an integral part of her recovery and transformation into a well behaved member of the community. Last I heard, San Francisco has more dogs than children and for many, their well being and their owners' sanity depends on the GGNRA parklands. I understand that some people are afraid of dogs, but it hardly seems that the way to encourage enjoyment of outdoor parks and appreciation of nature is through segregation of animals or by relocating them to the more urban San Francisco neighborhood parks. But that's what the GGNR, GGNRA seems to want. They're using the Snowy Plover, but even the Fish and Wildlife Service has not listed Ocean Beach as a critical habitat for those birds.

GGNRA has an obvious federal agenda, agenda that completely disregards the city and people of San Francisco, not to mention the dogs. Thank you.

SUPERVISOR WIENER: Thank you very much. And before we get to the next speaker, let me call some more names: Sheila Mahoney, Philip Gerrie ' oh, he spoke already ' David Anderson, Eric Nees [ph], Gloria Stein, Kimberly Thompson, Arnita Bowman, Nancy Stafford, William Carlin, Nancy Wuerfel, Paul Monti, Bob Planthold, Cindy Landell [ph], I believe, Lisa Vittori, Keith McAllister, Mara Armanini [ph], and Dr. Suzanne

Valente. Go ahead.

RENEE PITTIN: Good afternoon, Supervisors. My name is Renée Pittin, and I'd like to say something about the health aspects of recreation.

In my own case, my doctor has advised me, required me to exercise, and in particular to walk. I did try walking on my own and I found it both excruciatingly boring and like a forced march.

Fortunately I have a dog, so I do walk, especially at Fort Funston. Sometimes the weather is terrible, but Fort Funston is always awesome in both the contemporary and the traditional meanings of the term. And there is community there, both of those walking dogs and of those who don't have dogs and come there in order to see the dogs.

So in terms of both physical and mental well being, this small, less than 1 %, off-leash area is a very important component of our lives.

By maintaining and optimally expanding off leash in the GGNRA, the federal government has a chance to be at the cutting edge of its own Healthy Parks Healthy People program, enhancing opportunities for people to exercise with their off-leash dogs. Unfortunately they are going in the totally wrong direction. The city here has an opportunity to remind the GGNRA of the traditional uses of this tiny area and of the consequences to the residents of the city of this severe truncation of off-leash areas in the GGNRA.

Thank you very much for this hearing. Thank you for your resolution. And thank you for the opportunity ' finally ' to speak.

KATHY MOK-REICHARDT: Good afternoon. My name is Kathy Mok-Reichardt and I have been a resident of San Francisco for almost seven years. During this period of time I have never recreated in any of the GGNRA lands where off-leash dog walking is allowed until I adopted a dog.

As a rescue dog owner, I am extremely grateful for the 1% available parklands where I can exercise my dog off leash. Like many other rescue dogs, my dog came into my life with problems that I later found out only adequate exercise could, could solve. And having a previously abused dog, I am very thankful for Fort Funston, Ocean Beach, and Crissy Field, for they are places where my dog has found her confidence, has finally come to feel safe and even liked in a society with people that previously betrayed her trust.

Walking a mixed-breed dog with exceptionally high energy 3 hours a day around city blocks and city parks on leash is not comparable to the 30-

minute off-leash time she gets at the GGRA, GGNRA lands. It would be detrimental to my dog's well being and rehabilitation progress if off-leash dog walking is banned in these areas.

When I recreate on GGNRA lands with my dog, I always pick up after her as well as other people's trash, such as sandwich wraps, soda cans, cigarette butts, to name a few. I don't ' I wish I could speak for all dog owners, but I don't want to make the same mistake the GGNRA made by making generalizations of all dog due to, all dogs due to a handful of irresponsible dog owners. It's no different from attempting to limit the number of cars because of a minority of reckless drivers causing trouble on the road.

A proposal over 2000 pages with so little data to answer the questions raised by even our supervisors, is unreasonable to the extreme, and I urge the Board of Supervisors to take these into consideration when voting on the resolution. Thank you.

JOAN HOUSE: Hi, my name is Joan House. I've lived in the city for 35 years. I've own a dog for 49 years, and I love this city. And in the big picture, it's the land of the nuts and fruits [laughter] and what I love about that is, we're educated and we vote. And I appreciate the, Super Dean for being here from the GGNRA. And one thing that really stood out in the delivery was ' if the bird gets 10 months out of the year, that's a good thing. So why not give them 12. We can count. We can keep a steady, you know, calendar of what months to not harass or harangue the little Plover. I love those little Plovers. They're really really great. When I first moved here, I let my dog chase them, then I realized I didn't like that behavior, so for the last 35 years, my dogs don't chase birds. But, to stick him on a leash and to put him in a city park with, the overcrowding would be horrendous. It would make the dogs behave criminally and it would make the owners behave criminally. [laughter]. And it would just have so much stress on the parks that it would be ridiculous. It's not well thought out.

But if the dog, if the bird has 10 months, give it 12. It seems to be the power grab and the land grab of the federal government. Don't like it, don't appreciate it. Own dogs, vote. Thank you for the hearing and thanks for letting us speak.

SUPERVISOR WIENER: Thank you very much. Next speaker ' or singer

WALTER PAULSON: [Sung to the tune of "Fun, Fun, Fun" by the Beach Boys]: Well, the dog's running free like you want your best friend to be now [laughter] You forgot all about now the dog ha-as its needs now And he's running real fast and he's running real fast as he can n0000www And the dog will have fun, fun, fun at Fort Funston unless you take the off-leash dog law awa-ay. And the dog will have fun, fun, fun at Fort Funston if, unless

you take the Fort Funston dog leash away. And the dog will have fuuunn at Fort Funston unless you take the off law leash law awa,ay. [sung to another tune]: And then you can jump for your dog, jumpin' if you want to feel the freedom of your dog. Jump, jump for the dog. Tell me now if you want your dog to be happy and freeee, then juuump for your dog Jump in if you want to feel good kisses from your dog now. Juuump for your dog today. [laughter and applause]

SUPERVISOR WIENER: Thank you.

SHEILA MAHONEY: My name is Sheila Mahoney and fortunately for you, I won't sing today. [laughter] But I'm a 40-year resident of San Francisco and I am a senior. Since 1989 my husband and I have walked our dogs at Fort Funston almost every single day we didn't have to work. And I suggest that you visit Fort Funston yourself, to judge what's going, what's going on there.

I'm also a long-time volunteer with the, with the San Francisco SPCA Animal Assisted Therapy program. I have taken my dogs to hospitals, rehab units, and psych wards, so I well know that dogs can help to heal the body and the spirit. And I consider watching the dogs playing and running at Fort Funston ' my own personal animal-assisted therapy, open air session.

Frankly, if we didn't have dogs, we'd spend our time at home reading the New Yorker [laughter] instead of getting our 2-mile walk. I find it ironic that the National Park Service is pushing the Healthy Parks Healthy People program when they're cutting the 1% of the GGNRA lands now available, when they really should be expanding the area for off-leash areas.

When we started walking in '89, there weren't that many people out there. I, I'd say there's probably 20, 40 times as many people walking. We need more space, not less. Thank you.

SUPERVISOR WIENER: Next speaker.

PAUL MONTI: Good afternoon. Thank you for this opportunity to speak. My name is Paul Monti and I am a fourth generation San Franciscan. Thank you. I'm not paid to be here, and I've been at Ocean Beach all my life. I played at Playland. I fished off Seal Rocks with my, with my father before the National Park Service took over and blew up the causeway that we used to get out there. I played in the caves along the old Sutro Baths ruin before they took over and put bricks and walls up to keep people from playing in the caves. You know, and now I go up to, to Fort Funston and it's covered with concrete, it's covered with iceplant, which is an invasive species. Almost all of the trees there are eucalyptus, which are from Australia. And

it's still a wonderful, beautiful place to be. I, I absolutely love it.

Oftentimes I take a look at the, at the landscape and everybody out there and I just say to myself hm, well, let me remove everybody from the landscape who doesn't have a dog out here. And I'll do that and all of a sudden the landscape is completely empty. There's nobody there. And, you know, I'm wondering if that's how they want it to be.

Oftentimes I also go to the beach ' I live at 48th and Noriega, which is across the street from the beach. And you know, they're worried about the Snowy Plovers being stressed. There's no proof of all these allegations about them dying in mid-flight from being stressed or, you know, all this other stuff, but I'm wondering, if they're so stressed, why they ride motorcycles up and down the beach? Why they have ATVs with cops on them riding up and down the beach? Why they have 4-wheel-drives, cars, bulldozers moving sand around on the beach. Snowy Plovers have never nested there. I don't think that they're stressed any more than seagulls or pigeons or anything else for that matter, but again, I'm, I'm, you know, I'm not an expert. [bell] Is that it? [laughter]

SUPERVISOR WIENER: Thank you. Hi.

STEVE HOOKER: Hi, my name is Steve Hooker. I'm taking Angela Gardner's position because she had to leave ' not as a representative of ProDog, though I am a member. I am professional dog walker or winged monkey, depending on how you want to look at it.

A couple of things: GGNRA says that the current situation is, is not sustainable. It's been in place since 1979. We have the most beautiful thing in the city at Fort Funston. I have people from all over the world look at my Facebook page and the pictures of Fort Funston and what goes on out there, and they say why can't we have this here in Sweden? Why can't we have this here in all these other countries? It's just not true. They can sustain it.

One more thing: as a walker, I have to say this. It may not be their problem, but it is the city's problem. We have a gigantic industry in this area and in the city that is seriously threatened by this. You're gonna have hundreds of people unable to work. You're gonna have thousands of dogs unable to go out anymore. It's gonna be a big deal in all the ways that they've already told you about. Thank you very much.

SUPERVISOR WIENER: Thank you very much. Hi.

ARNITA BOWMAN: Hello, I'm Arnita Bowman and I'm an auditor with over 15 years experience. I was formerly with a major public accounting firm and was a senior IT auditor for the City of San Francisco audit. This

environmental impact study and plan is overwhelming and misleading to the public.

As an example, the National Park Service claims that our dogs are a public safety risk, even though there is virtually no impact on safety in their small incident counts or even ' sorry ' their small incident counts aren't even supported by the real GGNRA data. The actual GGNR data shows that about 1% of the public safety risks are actually related to dogs. This is in contrast to the 14% of Bay Area people that actively enjoy the parks with their dogs, often on a daily basis. For the subset of bite attack incidents, in looking at the actual data, most are relatively insignificant incidents related to scratches, bumps, or no injuries at all, and few require any medical attention.

I'm new to this cause and I have to say, I'm shocked by the deliberate delays by the GGNRA in providing real data to citizens. Initially I submitted a Freedom of Information Act request and the Park Service quickly responded. Then delays started when I was clear that I was a strong environmentalist and was pro-dog. It took 2 months and a Department of Interior appeal and the threat to go to court before the National Park Service provided a simple download of an access database with the Golden Gate, or with the GGNRA law enforcement data.

They are doing the same thing with my three other requests for real data related to the GGNRA and the hypothetical adverse impacts on, that are claimed in the report.

I have to say, I strongly agree with the environmentalists that we need to look at evidence but disagree that bad National Park policy, bad National Park Service policy should be the primary justification for this plan.

For over 30 years the dogs have been an integral and active part of recreation in the GGNRA, so changes need to be based on real facts and not all [bell] Thank you.

KEITH MCALLISTER: Good evening, Supervisors. My name is Keith McAllister. Let's talk about wildlife for a minute. Dogs have no impact on the Bank Swallows at Fort Funston. The GGNRA draft Dog Management Plan claims that dogs at Fort Funston "dig at or collapse burrows, flush birds from nests and cause active sloughing and landslides." In fact there is no evidence that dogs have any of these impacts.

The GGNRA monitors from 2000 to 2006 observed very few dogs in the closed area around the Bank Swallow colony. That's all the evidence there is ' the presence of a few dogs. Digging, flushing, and landslides are listed in the monitoring report as potential impacts, not observed events. From

potential impacts, the GGNRA leaps through continuing impact in the DEIS. Note that still no one has seen a dog collapse a Bank Swallow burrow, flush a swallow or cause a landslide in the Bank Swallow colony. It is significant that these impacts have not been observed. People have been out there looking for them.

A GGNRA researcher closely monitored the Bank Swallow colony in 1994 and '95 and wrote an official report. She observed that there were dogs present and noted that they did not disturb the swallows. She also listed a number of things that GGNRA should do to protect the Bank Swallow colony, but doesn't mention the dogs.

Speculation of what might happen, which runs counter to years of experience with what actually does happen is not science.

And I might add to a previous speaker ' the brush rabbits are still at Fort Funston, and although the quail are not, the quail are no longer at the Arboretum either, and the Arboretum is fenced with no dogs at all, but the fact that the quail are gone cannot be blamed on dogs here unless science means to you what it means to our friends in the local environmental community. Thank you.

SUZANNE VALENTE: Hi, I'm Dr. Suzanne Valente from Ocean Beach DOG. Thanks for hearing from us.

In 2006, when the GGNRA announced their intent to do this DEIS in the Federal Register, I filed a Freedom of Information Act request to obtain the data, documents, and/or staff report which substantiated their claim of controversy over the Dog Policy, compromised visitor and employee safety, and resource degradation, which justified this current DEIS.

The GGNRA's response merely stated ' the staff report and other documents you seek do not exist at this time. So, we're not crazy, there is no data behind the DEIS. But there is a predetermined outcome ' to remove all off-leash recreation. In 2007 now NPS Director Jon Jarvis me ' I would rather give up those GGNRA properties than have dogs running loose on them. The scientific studies in this DEIS were designed to support the GGNRA's predetermined outcome. The choice of Golden Gate Audubon Director Michael Lynes to perform the DEIS Plover study confirms this bias. I think he spoke here today. Golden Gate Audubon has been on record for years in opposition to dogs being allowed off leash in the GGNRA. The DEIS Plover study deliberately misleads the reader about the GGNRA's legal obligations to protect the Plover. Ocean Beach and Crissy Field are not designated as critical habitat by the U.S. Fish and Wildlife Service. Legally, the GGNRA is obligated only to prevent the harassment or taking of the Plover within its boundaries, none of which were observed in this study. So to justify their

predetermined outcome, the study instead relied upon arbitrary inadvertent disturbances, which could be as minor as the bird lifting its head or standing up.

This DEIS failed to mention the 2007 joint UC Berkeley-GGNRA Warren study that concluded Plovers feeding was not negatively impacted by the recreational activities of humans and dogs. All of the scientific data in the DEIS is equally compromised and must be disregarded. Skewing a scientific study to reach a predetermined outcome is unconscionable. Thank you. Oh, and can I leave you this?

NANCY STAFFORD: Hi, my name is Nancy Stafford and I'm a professional dog walker for 20 years. I'm out in the parks every day ' numerous parks across the city. And there is definitely an increase in the use of parks. Whenever there's been discussions over the past 10 years since the Dog Advisory Committee ' in fact, since Amos Brown discussed this ' there's always been a demand for more off-leash areas and not less.

So I don't know how they ' I mean, I guess you could go into an off day and not see very many dogs, but that's extremely unusual. They are heavily used and we need more spaces. In the evenings and in the mornings, they're overcrowded.

The other point I want to make is a study that was done about the Plovers that studied over 5700 dogs, of which only 6% actively chased birds ' well this was a study on all birds, but ' and of which only 19 chased the Plovers; that's out of 5700 dogs. I don't think 19 is a significant impact. Thank you.

SUPERVISOR COHEN: Okay, ladies and gentlemen: it is 4:46 and I have to use the rest room, so we need to take a 5-minute break and we will begin, we'll go back to public comment and we'll start with this gentleman over here, okay?

SUPERVISOR WIENER: Five minutes.

FEMALE VOICE: Supervisor Mar?

SUPERVISOR COHEN: He had, he had a meeting he had to tend to.

SUPERVISOR WIENER: Supervisor Mar had to go, yeah.

SUPERVISOR COHEN: But don't worry, we still have a quorum here..

SUPERVISOR WIENER: Still a quorum, yeah.

SUPERVISOR COHEN:...so we can still handle the business. Okay? So just

5 minutes. Wait a minute, listen up ' it's 4:46. Okay? Thank you.

[break]

SUPERVISOR WIENER: Okay, next speaker.

FEMALE VOICE: Thank you.

MALE SPEAKER: For decades I've been going to the local residential parks with my dog, with my dogs for recreation, hiking, and relaxation, and then insidiously and abruptly, the fact that we're about to lose it based on environmental allegations that haven't been fairly studied, proven, or peer-reviewed, basically a 2000-page, 10-pound allegation. But I want to thank our Supervisors for having this hearing ' thank you so much ' to address these unjustified draconian restrictions. I wanted to thank and encourage the supportive representatives that I think are helping us, including Mark Leno, Jackie Speier, and Leland Yee, and Dianne, and Senator Dianne Feinstein, who recently interviewed in the same kind of misuse of science and allegation to, to serve a preconceived agenda of shutting down a, a local oyster farm.

I wanted to also thank and draw attention to KGO and the host Michael Walcoff, to publicize and resist the cases of this misuse in science to deprive local owner, dog owners of our parks and beaches. Thank you.

SUPERVISOR WIENER: Thank you very much. And let me just call the final list of people before you go: Stephen Golub, I believe, John Jankowsky [ph], Lindsay Kefauver, Jill Inderdohnen, Courtney Durbin, Bruce Engel, Frank Triska, John Keating, Russ Kahn [ph], Susan Adams, Sandra Shuhert, Barbara Oplinger, Sky Kral, Ruben Garcia, Robin Buckley, and Dina Khait, and then Jose Maldonado. Thank you.

NANCY WUERFEL: Good afternoon, my name is Nancy Wuerfel. I support Supervisor Wiener's resolution opposing the GGNRA Preferred Alternative.

I have served for 9 years on the Park, Recreation and Open Space Advisory Committee. I care about our parks. The work by the National Park Service to evaluate the ripple effects of changing the Dog Policy on city, city parks is not finished. The draft EIS report fails to consider that San Francisco is one city with multiple owners of open spaces within our 49 square miles. One owner cannot make use policy changes without affecting the other owners of open spaces. The alternatives proposed by the Park Service for their land unfairly impact the city's stewardship of our land by crowding more people back into our urban parks for off-leash recreation.

More people using parks means more traffic and parking problems around those parks offering off-leash areas. More use of these areas means more maintenance. More maintenance means more money. The proposed GGNRA restrictions are not even the end of the squeeze play. With their stealth provision to further limit off-leash areas in an unappealable unilateral decision that these new restrictions are not being complied with to their satisfaction, the National Park Service can progressively remove permission in the future for off-leash dog areas to exist on their land. Then what do you think will be the result of this continuing strife? Supervisors, the public will be demanding that you fix this mess.

I do not own a dog, but I will be impacted because of the increased use of my park by people from all over the city looking to exercise their dogs. Before the federal government is, is allowed to further restrict off-leash use on their land, they must be made to declare what will be the impacts on the city, who innocently gave up much of our coastline to them.

Please require fair and honest disclosures. The Park Service is playing for keeps, the changes are forever, act [bell]

SUPERVISOR WIENER: Thank you. Next speaker.

BILL CARLIN: Supervisor Cohen, Supervisor Wiener, thank you for having this meeting. My name is Bill Carlin.

You heard a lot of testimony today pro and con about the DEIS, which, even from the testimony of Superintendent Dean, was deficient in its methods of formulation and its results. And far as the arguments from the people opposed to off-leash dog recreation, I think they're epitomizing the view of the ' or in the testimony of the representative from the Audubon Society that said that a Blue Heron might or might not have been killed by a dog at Heron's Head Park, might or might not have dog, have teeth marks on it, but nobody knows, so nobody can tell, so that's a good reason to cut back on off-leash recreation in the Golden Gate National Recreation Area.

Relative to the letter which the group of so-called putative environmental organizations sent to you, I had an email, which, part of it said ' moreover, we do not understand why some members of the Board expect the GGNRA to maintain what has been widely recognized as an unmanageable and dangerous status quo in the national parklands.

Major writing and rewriting of history here. First of all, it is not a national park, it is a national recreation area, and since, for the past 21 years the 1979 Dog Policy has provided a manageable and safe method of off-leash recreation in the Golden Gate National Recreation Area. The GGNRA is

never ' is never was, and is not a national park, it is a recreation area.

The DEIS is deficient, it needs more work and should not be implemented without more study. Please support the resolution. Thank you.

SUPERVISOR WIENER: Thank you. And one quick thing I want to note ' this has been an amazing turnout. We, our plan ' the second part of this hearing has to do with the regulation of commercial dog walkers and what we were gonna do is after this is over, go back and then broach that subject. We're, I don't think, we're not gonna have ' we probably have another half hour to an hour of this aspect of the hearing, so I don't think we're gonna have time to do that today because we're going to lose a quorum.

And so, what we'll do is, we'll finish all the public comment on the GGNRA. If there's anyone here ? and we'll continue the remainder of the hearing and have public comment at a subsequent hearing on that. If there's anyone here today who wants to talk about regulation of commercial dog walkers, please do so. But we will have the actual hearing on that later and you'll have another opportunity if you so choose. But I don't want to make people have to come back, and we're, we're, we would be happy to hear any input on that.

So, next speaker.

LINDSAY KEFAUVER: Hello Supervisors, good evening, Supervisor Cohen and Supervisor Wiener. Thank you so much for this hearing and for this resolution. Sorry. I would like, like to address what Superintendent Dean calls the compliance-based management, that Supervisor Wiener addressed earlier in his comments.

I'm very concerned about this. This compliance-based management is really in reality the poison pill of their Preferred Alternative. I'm very, I hear from Superintendent Dean that they're gonna use a third party to handle this. I'm very concerned about who this third party will be you know, are they gonna have surveillance cameras, are they gonna have volunteers, is it gonna be staff? I'm just, I'm very concerned about the fairness of it and I don't trust that it will be fair.

Regardless of which alternative is chosen, this poison pill means that within a few years, claims of non-compliance, whether real or not, will result in automatic changes, that dogs will be banned everywhere in the GGNRA. We dog guardians are contributing citizens of the United States. We are not outlaws. The National Park Service should be ashamed of even proposing such a scheme. As bad as the GGNRA's Preferred Alternative is, the poison pill makes it totally unacceptable and I think the city has every right to send a resolution restricting what the GGNRA can do, and I please, I ask you

please to not let this happen. Thank you so much.

SUPERVISOR WIENER: Thank you. Next speaker.

FEMALE VOICE: I need to.. SUPERVISOR WIENER: Yeah, take your time. We can just have other speakers go first? If you're gonna set up, yeah.

FEMALE VOICE: Oh sure. All I need to know is how I make a

SUPERVISOR WIENER: Okay.

JILL INDERDOHNEN: Hi, my name is Jill Inderdohnen. I want to thank you for the hearing. Pass the resolution and allow us our 1% please. Thank you.

FEMALE VOICE: Wow. [laughter/applause]

LISA VITTORI: How do I make this a full screen is what I'm trying to figure out.

SUPERVISOR COHEN: IT will take care of that.

LISA VITTORI: Whoop. And I apologize for ' okay. Should I wait for ' no? [referring to slide projector] Is it, is it..

SUPERVISOR WIENER: There you go.

LISA VITTORI: Okay. This is the slide show that Andrea played a little while ago, but I wanted to point out several things. My name is Lisa Vittori, by the way, and I've been organizing a lot of this because I used to work for the National Park Service and I think that they're lying. And I think they're biased, and I'm really sad about it because people have had to choose sides.

So I just wanted to show you a bunch of slides that are about joy. We are the people who are using the parks. Who do they want to reserve it for?

So kids ' kids are afraid of dogs. Here we are [referring to slides]. People of color are afraid of dogs. This is what ' these are counter ' this is just Sunday. This is Sunday. Any day we could have seen this. This is a family. People need places with, for their kids and their dogs. This is an elderly person, okay? On Sunday afternoon, okay? With a cane. Okay, I keep hearing that kids are afraid of dogs, people with disabilities, people of color, blah blah blah. You know, I think it's a lie. And that's one of the things that I want you to pay attention to.

This is a small dog group. It's a community that comes out ' I don't know if

it's monthly or weekly. This is, this is all of them. These are the people who are using ' who are we saving this beach for if not this public?

This is a group of kids from a school. They're probably not allowed to touch this dog ' because I work in schools ' but I'll tell you that they probably fought for the prime position next to that dog.

She says she's been walking in the GGNRA for 80 years, okay? She's obviously more than 80 years old. Okay? A person with a dog; I don't know if she's a teenager or young adult, but look at the expression of joy.

This man is, this is Muir Beach ' because this isn't just San Francisco, this is also Montara, this is Muir Beach, this is all ' it's a regional problem. He said ' I've been coming here for 40 years, I've never seen a problem. Okay?

This is Angela Gardner, the pro dog walker with her out-of-control dogs [laughter]. Another set of dangerous dogs right here [laughter]. Now this woman is getting active exercise. Okay? A child, okay? Playing with her dog. Watch this ' okay, I don't know which beach that is.

Another kid with their dog. This is what it's like. This is Crissy Field at the inlet that they want to keep us from being at. This inlet is full of kids and dogs every sunny day. Okay? Elderly people. Now I want to point out this one ' this is [bell] Where, what happened to my 2 minutes? Oh my God. [laughter]

SUPERVISOR WIENER: Thank you very much.

LISA VITTORI: Thank you.

SUPERVISOR WIENER:Hi.

COURTNEY GUNTER-DURBIN: Hi. My name is Courtney Gunter-Durbin. I own a dog training and dog walking business in San Francisco and I also sit on the Board of Friends of Animal Care and Control here.

I'm extremely concerned about the impact the GGNRA plan could have on local dogs and their owners. As a trainer, I can't overstate the importance of appropriate off-leash exercise for dogs to prevent behavior problems. Leashing, restricting and confining dogs to fenced areas will create more conflict, not less. Dogs who feel restrained and overcrowded are more likely to display reactive and aggressive behaviors.

I personally was present at Stern Grove the day of the tsunami warning and in fact had to break up a dog fight there that day. I have no doubt that the overcrowded conditions and the lack of personal space and the frustration

the dogs were experiencing was a big factor in that fight.

It's also really important to make a distinction of what is appropriate exercise for dogs. All dog play areas are not equal, so comparing Fort Funston to the fenced-in dog run at Golden Gate Park is really apples to oranges. Some of the play areas that are underutilized are underutilized for good reason. They offer inadequate space or environment for appropriate exercise and they don't offer any exercise outlet for the owners, who also want to be out there exercising with their dogs.

So we need true open spaces for off-leash dogs under voice control to be able to take a real walk. Thank you so much for hearing us today.

SUPERVISOR WIENER: Thank you for coming. Next speaker.

SKY KRAL: Hello, my name is Sky Kral and I'm a Bernal Heights resident, and therefore I live in David Campos's district, he's my Supervisor, and I walk his dog, Winston. [laughter] He's a fabulous bulldog and he's not overweight, he's 6 years old and very fit because he's been going out with me since he was a puppy. Winston and I and about 5 or 6 of our canine friends, we go to various San Francisco parks and sometimes to Fort Funston. I have never seen an empty park. I usually walk between 8:00 AM and 2:00 PM. They came right after the dog walkers started taking the dogs home, I believe, to ever find an empty park in San Francisco. At 5:00 the dog owners start coming home from work and then they take their dogs out. It's often very crowded there.

If I go to a small park, some of the dog, enclosed dog play areas are no larger than the size of this room or possibly twice as big as this room. And once you have one or two dog walkers, you're fine in there, but if a third or fourth dog walker comes in ' as they will if Fort Funston is shut down ' it is chaos, there are fights, there are problems, there are parking issues. All sorts of problems develop.

Another park that I like to use is McLaren Park. It's fabulous. It is the largest off-leash dog area in San Francisco city, this area. There has been a proposed take-over of some of the, the only regulated off-leash dog area in that park by the Frisbee golf club. And they are trying to overlay their golf club Frisbee course on the off-leash dog area. They also have a poison pill in their reg, in their rules about it, that if there is conflict, dogs will have to leave the area. Put a dog and a Frisbee together ' there could be a conflict. [laughter] So, and so another poison pill, and they have not yet gotten permission, though I have seen them already start to level some of the land, put up posts, drop concrete, and it is not even already, it is not permitted yet. [bell] Thank you.

FRANK TRISKA: Hello, my name is Frank Triska. I live in Noe Valley. As we all know, Ocean Beach is a rather narrow strip of sand. When you look to the west there's the whole rest of the world. When you look to the east, you look at the homes of 800,000 people crammed into 49 square miles. Yet we heard today, in the first presentation, that as a, relative to national park policy, there's no real difference between Yosemite and Playland at the beach. If the presence of 800,000 people next to a beach is of no consequence, then I'm not surprised that we have a problem.

My major use of the Golden Gate National Recreation Area is to run our dog at Fort Funston. Before we had a dog, we had a small child who is now grown up, and we used to go to the beach near Taraval. And my son would get sticks with his friends and run up and down the dunes, swinging his swords and yelling and hootin' and hollering and having a generally good time. I know now that that was probably more damaging to Snowy Plover habitat than anything my dog would ever do. But if we're not going to leash the children, and we are, we're not gonna leash the dogs, then probably a better solution is to identify the really critical habitats and place, fence them off and then free the beasts and the children. Thank you. [applause]
SUPERVISOR WIENER: Thank you.

FEMALE SPEAKER: Thank you for having this hearing today and I, in case I marked my card wrong ' I'm a little jet-lagged ' I am for the resolution.

I am the proud owner or owned by a 12-year-old black Lab named Otis, who is in incredibly good shape for an older dog. The reason he is in the good health that he is in is because he goes out with a dog walking group, Pawsitive Tails, 3 times a week to Fort Funston, and often goes to either Crissy or Fort Funston with me on the weekends.

Let's not pretend that the dog parks in San Francisco are equivalent to the experience you have taking your dog to Crissy Field or to Fort Funston. They are not. Some of the San Francisco parks are great, I don't mean to diss them. Some of them are glorified dog runs. They smell bad, they're small, and these are not appropriate ways to, for me to get exercise and for my dog to get exercise.

I'm very concerned about the 75% compliance, as are many people. I see it as equivalent to, you know, if 10 people run a red light, then you close off the intersection and tell everybody to walk. I think we need better enforcement for people who are violating than we currently have. I think there are ways to make the status quo work with better enforcement, better fencing for these protected areas, clearer signage and education.

One other concern I have that I just wanted to mention is that part of the Fort Funston plan has us getting our dogs down to the beach on leash. I

would like, and I would challenge anyone in the GGNRA to take an enthusiastic water dog who's anxious to get to the beach, and try to get down that steep slope with them on leash.

Let's see. I believe that's all I have to say. Also, I am in support of the dog walkers, there are plenty of professional, well [bell] walking groups out there who will be impacted as small businesses if this goes through. Thank you.

SUSAN ADAMS: Hi, my name is Susan Adams and I'm a resident of San Francisco as well as a native. And I've been taking my dog for over 30 years to Fort Funston for exercise. And I have to say that I have not experienced one serious problem in all those 30 years, and you would think that in all that time I would have, I would have seen ' except I was around the time a man stabbed a dog, but I didn't think that was the dog's fault, that was a, a human problem.

It seems to me, listening to all the environmental organizations that came forward this afternoon ' it seems incredibly disingenuous to me that they would single out dogs as the sole or the primary cause of disturbance of the environment without considering human events like Fleet Week, when hundreds of people go to Crissy Fields and trample the Plover habitat without any restriction or guidance from GGNRA. Or what about the Turkey Trot, where 1,500 people ran down Ocean Beach, right through all the Plover area and again, that, that was encouraged by GGNRA. And then, what about ' can you ' how does this work? Turn it over? [referring to slide projector]

I don't know if you can, if you can see that well. GGNRA themselves plowed over a, a section of Ocean Beach in 2007 that was the Snowy Plover habitat area. That's why the Snowy Plover isn't, isn't residing at Ocean Beach anymore, because they did it in, in order to prevent erosion. This is all on-line. You can see pictures, and I'll probably email you some more. Thank you.

SUPERVISOR WIENER: Thank you. Next speaker.

ROBIN BUCKLEY: Hi. My name is Robin Buckley, I'm a fourth generation native San Franciscan. My parents still live out on 39th Avenue where I grew up.

And being out by the beach, I used to go Fort Funston as a child to play Army with some of the neighbor kids. This was when it was still a military installation, but you could go out around the edges. Now I go out there on the weekends and I can, you know, hardly walk through, I mean there's so many people out there walking their dogs. And we need more space, not less

space.

This was supposed to be, in, when, the city gave the property to the GGNRA with the stipulation that it would remain, we'd be able to use this property as we have traditionally. Traditionally I have used it to walk, but primarily to walk dogs. I've had several dogs over the years and I hate using dog parks. Dog park, I walk around in a circle because the dog park isn't very big. So, you just end up going around in a circle on a path.

I'd much rather have an experience walking along the beach. I don't necessarily ' right now we go down to the legal end of the beach, down by Sloat. There's a, a area that's less than a block long. When it's high tide, you can't even walk there. And that's what they've given us. They've given us this little tiny area to walk in, and I'm disgusted. Thank you. [laughter]

SUPERVISOR WIENER: Thank you very much. Next speaker.

JOHN KEATING: Hi, I'm John Keating. Thank you, Supervisors. I've been following the GGNRA management issues for about a decade now, since I arrived at the coastal bluffs to find that the Park Service had closed the only really good disabled access trail in the Bay Area without any concern or contact with the public beforehand, and then subsequently watched as they closed down the only large sand dune that children could play on in the Bay Area while completely ignoring public comment they received on that.

I want to thank the GGNRA ' Superintendent Dean, Howard Levitt, Sherwin Smith, and the others who are behind us who's involved in this process, for being here. I want to thank them for their public service. And I think this is the highest public service, when you listen to the public and in a public hearing.

I think that goes to the central issue of what's going on here, and make no mistake about it, the change in process by the GGNRA fundamentally changes the way it deals with the people and with the city. And what they have done ' well let me first say, I agree with many of the comments about the technical deficiencies of the NEPA process. When there is an analysis presented for impact review, it ought to be scientifically sound and not read as an advocacy piece rather than an impartial presentation. And there is that risk in this process; it's been identified by the courts before as a process where the Park Service wishes to railroad through such changes.

Going to this current process ' what is fundamentally different, that impacts the city and the people, is a change from the mandate and goal to listen to the public's interest, concerns, desires, [bell] to change, to do a technical back room analysis.

SUPERVISOR WIENER: Thank you very much. Next speaker.

RUBEN GARCIA: Hello Supervisors. My name is Ruben Garcia and I'm a SEIU union organizer. How're you doing. Thank you very much for having this hearing. I just want to echo the, the previous speaker. This is the hearing that the GGNRA didn't have. They didn't want to face a public upset about what they were doing, and that's why they created that kind of like, like a easy, easy for them process when you go and you talk to one of them, and they don't care what you say, nobody's listening to you; there's no record. There's a record of this, and I think that's the way they should conduct their business.

So anyway, so we're talking about 1% of the total GGNRA. And I'm a lifelong environmentalist. Believe me, I, I, I used to be part of the Sierra Club inner city outings. We used to take San Francisco kids to the beach because a lot, believe it or not, a lot of our kids in the Mission and the Bayview, they never make it to the beach, they never make it to Fort Funston. So we used to take kids from there to the, to the beach or to Yosemite, whatever.

I also have a letter here from over 50 businesses that are related to dog ownership, and they are protesting. I want to introduce this into the record. They are protesting the GGNRA policy that they're trying to impose. I, I, I went through the, through the draft that they have. I, I was trying to find the evidence of some, of some situation. I just couldn't do it. So I truly believe that this is a process that they have developed to really wait us out, where in 5 years or 7 years, we won't be able to go to Fort Funston or any of these places.

So I urge you to introduce these resolutions as a way to bring them back to the negotiations table. This is a city. This is, and I'm, really feel sorry about them. They probably used to work at Yosemite or one of those beautiful parks, and then they, they got transferred to the city, [laughter] where they live, where now they're running a park with over a million and a half people next to them. And there, and it's very hard to adjust to that, and I understand that. But they have to understand that this is a recreation area. This is an area where we have [bell] to bargain, we have to understand each other. Thank you very much. [applause]

SUPERVISOR WIENER: Thank you very much.

BRUCE WOLFE: Good afternoon, Supervisors. Thank you very much for introducing this resolution and for having this hearing. It's our only opportunity to be able to be heard.

My name is Bruce Wolfe. I'm President of DogPAC here in San Francisco.

And I just want to say, your, Supervisor Wiener, your opening questions to the GGNRA about whether this has been done anywhere else in the country with regards to dogs just lends itself, to me, to be that it's one big huge experiment ' that we don't know what's gonna, the outcome is gonna be, we don't know how enforcement is gonna go. There's, we already know from, even from the environmental groups' own admission, there hasn't been very good enforcement as it is, with the current areas that are protected. I also want to say that I did, I, I am a person with a disability. I'm also a disability advocate, and, along with my colleague, Bob Planthold, who spoke earlier. I do want to say that I did contact many disability organizations, one of which is Disability Rights Advocates, who has now a lawsuit which is possibly going class action against the GGNRA for ineffectively making the GGNRA ' all of the GGNRA ' accessible to people with disabilities. And this has, you know, been an ongoing case since 2008.

Also, nobody had mentioned, with regards to the science, what's happening at Drake's Bay. And I think that needs to also be part of the discussion here.

GGNRA butts up against the City and County of San Francisco, which you know you don't have control or jurisdiction over since the transfer, and essentially leaves San Francisco landlocked, without any access or control over its future of its coastline.

I'm a person with a disability, as I mentioned. I have a service dog that I adopted from the SFPC, SPCA. He's 14 years old now. Why? Because he's able to have those large open expanses to be able to run. And to be 14 years old and to be an, almost a 90-pound German shepherd [bell] is quite a feat. So I support the resolution. Thank you very much.

JOSE MALDONADO: My name is Jose Maldonado. I am a young athlete, and I think dog off leash in parks help people exercise more, stay healthy, and I think we need more parks like this instead of taking off. I know, I don't know the, the purposes of this, where who thinks that we don't know, but seriously I think people enjoy so much, as well as my girlfriend, family and friends, and new people that we meet and dogs that we interact with. So I think this is a very beautiful thing to have. Please do not take it away.

DINA KHAIT: Hello, my name is Dina Khait and I'm here as a dog lover, owner, advocate, current volunteer for Rocket Dog Rescue, and nursing student. And I want to say that we have a family dog who's 13 years old and as long as I remember, we've always taken her to Ocean Beach and Fort Funston, and it's just some of the greatest times that I know that me and my friends and my family have had, especially after you're, you know, stressed with school and work, you just, you don't want to go to a little tiny city park that's gonna be overcrowded. You want to have a nice, beautiful area with

mountains and beaches and very friendly dogs.

I haven't, I walk there several times a week - 3,4 times a week - and I never see dogs doing anything except playing with each other. You know, okay, we can, they say that we can have the dogs on leash, but everybody knows that dogs cannot have the same exercise on leash as off leash. And obviously there are many people that are not physically capable of, you know, running as fast as their dog [laughter]. Obviously for many reasons ' physical condition, you know age, disability, whatever the issue may be ' but that doesn't mean that their dog shouldn't have the right to be healthy and get socialized with other dogs.

I've fostered over 25 dogs with Rocket Dog Rescue and each one of those dogs I have taken to Fort Funston. So, I oppose the plan.

SUPERVISOR WIENER: Thank you very much. Hi.

ALLISON MORGER: I know it's been a long day for everybody, so I'll kind of keep this short. My name is Allison Morger. I am a dog walker and trainer in the City of San Francisco for the past 13 years. I also own a pet store in the West Portal area. And there's a couple of points that I don't know if people have made enough.

Every day at Fort Funston, I'm there every day, and I pick up a couple of bags ' big bags of trash from the beach. This trash isn't left by my dogs. Cigarette butts not left by my dogs, left by human beings.

I've also rescued several seabirds that have been caught in the line of fishermen that are allowed to walk on the beach, cut their lines and leave their hooks. And I don't see any regulations and signs for them, but that seems to be perfectly reasonable. I've rushed several seabirds down to Peninsula Humane Society who have been caught in those lines.

The other thing is that when you take the dogs out of an area ' for instance, John McLaren, and I walk there often too, it's a beautiful park ' on the weekends it's not safe. I tell my clients don't go if the dog walkers aren't there, because there's tons of gang violence. Because when you have dogs in an area, you're not gonna have homeless encampments and you're not gonna have a bunch of gang violence and people that are possibly up to no good in that area. So, taking the dogs out of Fort Funston is gonna open up a huge number of problems that I don't think anyone has really looked at the monetary thing of, of policing those areas from those types of things happening. Thank you.

SUPERVISOR WIENER: Thank you very much. Hi. BARBARA OPLINGER: Hi, I'm Barbara Oplinger and against my better judgment I'm

up here speaking [laughs]. But I do want to make two points and one is that I, I'm against the GGNRA's proposals, their report, their plans because it's blatantly discriminating against dog owners. If, if we can't go to these areas, we, we have a responsibility for our dogs and we can't go to the areas that are being blocked off.

And the other thing is that as a frequent visitor to, to Crissy Field, I have noticed that when, when the park put a more substantial fence around the Plover area, it actually helped greatly to prevent people from coming through the areas. So, all they need to do is make provisions like that to help and to not discriminate against dog owners. Thank you.

SUPERVISOR WIENER: Thank you very much. Hi. Come on up.

JANET SLISMAN: Hi, my name is Janet Slisman and I'm a professional dog walker in San Francisco. I'm, I've been in business now for about 3 years and my reason for going into the business was because there were so many different problems with dog walkers that I felt like I could really make a difference. And so I started my business using, I have six crates inside of a van, so each dog has its own crate with bedding, and it's safe. And I only take 6 dogs at a time. I have a first aid kit and I'm certified in first aid. All the things that, that dog walkers should be doing.

And I just feel that because I've been doing this for 3 years, I've kind of like been the trial person that does 6 dogs work ' the number of dogs you take out. And what I feel is, is because the, because the, the employment in the city and the economic environment have been so bad, that it makes our business very unpredictable. And so I have customers that are trying to cut back on their, on their dog walking costs, and so they will call me at the last minute and say can you please take my dog, you know, so at any given moment, even though I say I have a limit of 6 and I have a list of 6 dogs, I may have another customer add in another dog. So the reality of it is, is if you, if you use the, the amount at 8 dogs, it makes it a lot easier for us to be able to sneak in a dog extra every day if I, if we have to. And so that makes it easier for our businesses to be run.

The second thing that I wanted to talk about was the fact that in the proposal, they are [bell] Is that the?

SUPERVISOR WIENER: You can finish your sentence.

JANET SLISMAN: Okay. They were saying that we, that we have to keep our dogs on leash as we get out of the vans, and that's really difficult because the people that employ, or who hire me are people are, who have very difficult dogs, and so, you know, taking 6 dogs down the beach off

leash is really a very difficult thing to do. Thank you.

SUPERVISOR WIENER: Thank you. Okay, is there any further public comment? Okay, hearing none, public comment is closed. Thank you all so much for coming out. Now, Superintendent, would you like to say anything?

SUPERINTENDENT DEAN: I'll be brief. This is, the hour's late. Thank you for, for the hearing today. I, I was, we were all taking notes and, and I think it was informative for us. We've listened carefully.

As today's comments show, I think this is a difficult and challenging issue for us all. We are the second most national park area [sic] in the country, 14 million people, and we realize that a large part of that is because we live next to 6 million people who come here many times during the week.

I'm not gonna get into rebuttals or disputing some of the things we've heard today, but I, I will say that, you know, we do manage ' one thing I did want to point out ' we do manage 80,000 acres ' that's what, that's within the park ' but only manage directly 14,000. But it seems like a lot of the areas that we're focusing on and that we studied for the plan is the same small percentage, sort of the prime real estate where everybody wants to go ' the beach areas and some of the more popular areas like Crissy Field. So we understand that. And, and that's part of the challenge that we all face.

We will continue to work with the city as we go forward. And at the end of the day this will be a plan that attempts to balance the recreational needs and, and also protect resources. And we'll be deeply informed by the great input we've heard.

I also wanted to mention that through the previous meetings that we had ' the public meetings ' we have over 180 pages of flipcharts that are being translated and, and put into informing us in our, in our plan as we go forward, and will be incorporated as public documents in the final plan. In the end, though, this will be the most friendly national recreation area in the country as far as dogs ' whatever, whatever form it takes, whatever the final details, it's gonna be the most friendly national recreation area in the nation.

We, we take our recreation mission very seriously and this means that we have to balance and consider the needs of all users.

So thank you again and just a reminder to everyone ' we have been taking notes, as I said, but continue to comment, you know, substantively through our website so that we can account for all the comments.

SUPERVISOR WIENER: Thank you. I appreciate that and if I may just ask: so going forward, will GGNRA, will you be in a position, in terms of

interacting with the city representat

Correspondence ID: 4703 **Project:** 11759 **Document:** 38106

Received: Jun,15,2011 00:00:00

Correspondence Type: E-mail

Correspondence: Please make the parkland accessible to human beings seeking an opportunity to enjoy the the natural environment. Dogs in parks ADD SIGNIFICANT STRESS to the environment. Adding dogs to the park environment have a large negative impact. They disturb the natural environment. My father was a game warden and he always told me that we were guests to the environment. It seems to me that people with dogs bring them to the parks and let them run wild, not supervising them. If you are going to allow dogs in the park, please consider a dog access fee of ~\$10-\$20 per visit for the dog. The access fee needs to reflect the actual disruption. -Rosemary

Correspondence ID: 4704 **Project:** 11759 **Document:** 38106

Received: Jun,15,2011 00:00:00

Correspondence Type: E-mail

Correspondence: Dear Mr. Smith, Thank you for letting me submit my letter! It really means a lot to me. The letter is below.

-Willa Hegarty

Dear Superintendent Dean,

My name is Willa Hegarty. I am 13 years old. I have been a resident of San Francisco my whole life. I have always been a dog lover. Two years ago I got a golden retriever named Lucy. She has brought me so much joy. Before having Lucy I had never heard of Fort Funston or Ocean Beach. I am NOT an anti-enviromentalist. I ran for ecology in my school. I love all animals and do not wish to hurt any. I want to maintain places in the GGNRA for future generations. I visit Fort Funston 3 times a week. My dog was very shy. We would go to "Puppy Socials" and she would try to escape from all the dogs. When we took her to Fort Funston she got exposed to many dogs and people. This helped her blossom. She is now a very happy, energetic, and social dog thanks to Fort Funston.

I think the GGNRA's proposal is unbalanced. It has failed to show impact on City Parks. It does not contain factual information. The GGNRA did a study on dogs and the Western Snowy Plover. 5,692 dogs were observed. 94% did not chase birds. 6% chased birds that were mostly seagulls. 19 dogs chased

plovers. I think this is the owners' fault not the dogs. The owners did not properly train the dog. The DEIS plan was based on disturbances. Disturbances can be as slight as the bird moving it's head.

I believe the DEIS plan was not based on facts but assumptions. The DEIS plan eliminates off leash walking or bans dogs altogether. The DEIS is full of things that might or could happen. There is no evidence that the information has or ever will happen. It also assumes impacts on the parks are all from dogs , but they could involve weather, people, natural predators, etc. The DEIS made no attempt to identify, study, or report any benefits on recreation. A DEIS plan should be based on science not opinions.

The Compliance based Management Strategy (CBMS) says that non-compliance leads to negative impact. There is no evidence this is true. This statement should not be accepted.

In 2006 Suzanne Valentine filed a Freedom of Information Act that requested the data, documents, and/or staff report that justified the DEIS. She got a reply saying that 'the staff reports and other documents you request do not exist at this time'.

The GGNRA is required by NEPA to consider impacts on humans, including human health and social community in a DEIS. The DEIS had NO mention of health or social community. Having a dog benefits you physiologically, psychologically, and socially. No health benefits were mentioned in DEIS.

Fort Funston for example has the most diverse social community I have ever seen - people of every age, race, ethnic and religious group. I talk to people I wouldn't even notice if it weren't for our bond with animals.

Usually every person I meet is nice and calm. I think this is because they are around dogs a lot of the time. Walking dogs has different health benefits. Walking dogs provides people with exercise. Obesity is a major problem in the country. Walking my dog is a big part of my exercise. My dog has also been overweight. Fort Funston has been essential to keeping her at a healthy weight.

The DEIS says dogs scare away children. I think if children are exposed to dogs at a young age they won't care if one licks them. I see many children at Fort Funston on the weekends. There are also many health benefits. For more information on health benefits please look here

www.pawssf.org/document.doc?id=15)

The GGNRA is treating its land like Yosemite and Yellow Stone. The

GGNRA is a unique area. It shouldn't be treated like other parks. It is an URBAN AREA. IT IS NOT A PRISTINE WILDERNESS! GGRNA is a National Recreation Space. One Recreational Activity is Dog Walking. I find it Ironic that the NPS has a Healthy Parks Healthy People initiative. They don't want us to walk because we are walking with our dog.

The GGNRA has failed to show the effect on city parks. Tsunami Friday was an example of this. When dogs are put in a small area there is a pack mentality. When dogs are put in a small area they get aggressive. There will be more dog bites and accidents. There will be more accidents in the GGNRA as well. The DEIS plan claims "An increase in nearby parks is unlikely...." There is no information to support the statement. Scott Wiener asked the GGNRA at the hearing at City hall how he evaluated that there would be no impact on city parks. The GGNRA replied It was not an exhaustive study. NEPA required the DEIS to show impact on neighboring cities.

Rather than put out a document with no substance. I suggest you scrap the document. Start from scratch and contact dog behaviorists. Or you could start enforcing the 1979 pet policy. Put up more signs and maintain the parks better. In the two years I have been going to Fort Funston I have only seen ONE ranger! Enforce the rules instead of making up new ones. I support Alternative A, the No Action Alternative.

Thank You Willa Hegarty Age 13

Correspondence ID: 4705 **Project:** 11759 **Document:** 38106
Received: Jun,02,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Dear Superintendent Frank Dean,

I am writing to you regarding the GGNRA's Draft Environmental Impact Statement. The document you have prepared is not based on facts about dogs' impact on the environment and the survival of endangered species. There is no scientific data to illustrate your conclusions in your report. Humans, pollution, and other factors contribute to certain species being endangered.

I walk my dog at Fort Funston and it could hardly be compared to other parks such as Yosemite. I have never seen a ranger patrolling the area. I only see maintenance workers clearing out the trashcans. The pathways have potholes and fences are falling down. The weather is often inhospitable, but dog owners brave the conditions to exercise their dogs. Most of the dog parks in San Francisco are very small, so an area like this is really needed to

sufficiently tire out dogs to maintain their physical and mental health. The impact on San Francisco's dog parks was not addressed in the Draft Environmental Impact Statement.

The National Park Service has never tried to police the area. There is very little signage put out. The City of San Francisco is looking for ways to improve the area by restricting the number of dogs that dog walkers can handle at a given time to 6 dogs. Fewer residents use the park during the week. It is during the weekend that more people use the park when there could be more problems with dogs. Rangers should be present to cite any violations.

If the GGNRA's preferred alternative goes through, the only users of Fort Funston will be the hang gliders. (Maybe they are impacting the habitats of the birds in the area by flying around.) I really get the feeling that with the National Deficit as it is, the leaders of the National Park Service would prefer to leave Fort Funston abandoned with very little use than to have it be a robust recreational area for the residents of San Francisco and San Mateo counties. Please go back to the drawing board and come back with an alternative that we all can live with.

Thank you

Anne Kenney

Correspondence ID: 4706 **Project:** 11759 **Document:** 38106
Received: Jun,15,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Email submitted from: at /goga/contacts.htm

Mailing Address Liz Searle Grass Valley, ca 95945 usa

Dogs are OK on the beaches, don't remove any more of our freedoms.

Correspondence ID: 4707 **Project:** 11759 **Document:** 38106
Received: May,23,2011 00:00:00
Correspondence Type: E-mail
Correspondence: Mailing Address Joyce Brown Piedmont, CA 94611 USA

I support all bonds to buy parkland because of the joy I receive in walking my well-behaved dog off-leash. It is a joy to meet other people and their dogs at Crissy Field in San Francisco. I feel that people who are not

considerate should be fined and lose their privileges, but the ones with good mannered dogs should not be punished. Please allow off-leash dogs in your parks. Thank you!

Correspondence ID: 4708 **Project:** 11759 **Document:** 38106
Received: Jun,15,2011 00:00:00
Correspondence Type: E-mail
Correspondence: It's bad enough the state doesn't allow dogs in all of their parks(except the parking lot and restricted paved areas). PLEASE DON'T bar dogs from national recreation areas too. We won't have anywhere we can go. If you're worried that off leash dogs will molest wildlife - have a leash requirement JUST IN THOSE AREAS. People who love the outdoors love their dogs too. The number of parks that accepts dogs is too limited. If you're arguing that dogs make a mess - look at Baker Beach, which is very clean. All you need to do is provide enough trash cans and bags. Help us please! Don't lock us out.

Correspondence ID: 4709 **Project:** 11759 **Document:** 38106
Received: May,31,2011 00:00:00
Correspondence Type: E-mail
Correspondence: I am dog owner and also consider myself an environmentalist and I do not support the preferred alternative in the Dog Management Plan. I feel that is too restrictive and unfairly penalizes the majority of dog owners for the indiscretions of some bad ones. GGNRA is an urban park, centered in an area with more dogs than children, and dog owners and dogs need more open space, not less. Dogs are not permitted on state lands and the San Francisco city parks that allow dogs are small in size, limiting the length of stay. Many dog owners, like myself, love the privilege of taking long hikes or walks on the beach or on Marin County trails with our dogs. This plan drastically reduces - and in many cases - eliminates this option.

I particularly object to the proposed changes at Fort Funston. The restrictions here are drastic and reduce the amount of off-leash area by almost 90%. The small off leash area near the main parking lot is not nearly enough space for all the dogs and owners that utilize this part of the park. This reduction in space - and forcing too many dogs in a smaller area, could result in conflicts that this plan attempts to reduce. Dog walking at Fort Funston is a long standing recreational use, and it is perfect for it. It has wide expanses of sand, with little important vegetation or habitat (even prior to dog use) which provide open spaces large enough for everyone to enjoy.

The plan discusses a loop trail from the parking lot down the Beach Access

trail, along the beach, and up the Sand Ladder. However, the majority of time, the outflow pipe blocks passage down the beach, making a loop impossible. This results in reducing the off leash area even further. One of my favorite places in the city to walk with my dog is south of the sand ladder. The proposed new rule banning dogs on this section of beach is unfair and unnecessary. This section of beach is not overly used and I have never encountered any conflicts. It is a peaceful stretch of beach, and long enough to allow space for all users. Additionally, this section is proposed as off limits to dogs because of the bank swallows, but there research by California's Department of Fish and Game that found that the bank swallow is remarkably indifferent to the activities of people near nesting sites. Bank swallows frequently nest near intense human activity, including busy highways, construction sites and quarries. There does not appear to be scientific evidence supporting the claim that people or dogs on the bluffs far above the nests or beneath the flyover zone would hurt the birds.

I believe the analysis for indirect impacts to adjacent lands isn't accurate either- no impacts are anticipated for areas at Fort Funston, but when Fort Funston's proposed off-leash area becomes so crowded, dog owners may go to other areas, creating visitor and other resource impacts. In the 1970's and early 80's, Fort Funston was a cesspool of illegal activity. By walking dogs at Fort Funston, dog owners have transformed this part of the park into safe community of people who look out for each other - as well as the environment. Dog owners are not deviants; we are legitimate users of the park that should not be penalized.

The plan seems to set aside certain areas in each county for dogs (i.e. Rodeo Beach in Marin), and without a doubt, the majority of Fort Funston should be for off-leash.

I have similar objections and concerns about the proposed restrictions for Crissy Field. There is little habitat of value at East Beach. This area is very popular area for off-leash dogs, and to prohibit dogs from this area entirely is again, unfair and unnecessary, and forcing all dogs that use this area into the small section of central beach is a recipe for conflicts.

The NPS is changing a long standing tradition of being able to walk a dog - off leash - on the beaches in San Francisco. A better compromise needs to be reached.

Thank you. C. Scerri

Correspondence ID: 4710 **Project:** 11759 **Document:** 38106
Received: May,27,2011 00:00:00
Correspondence: E-mail

Type:

Correspondence: i do not support the dogs who walk the Tennessee Valley trail to the beach. The ladies, who I walk with tell people that it is against the law to have their dogs (sometimes off leash) walking to the beach. However, there is very little enforcement on that trail. As far as the Alta, dogs should be on leash instead of under "voice" control. As you know, the Alta is the best doggy park in the County, however not everyone wants a dog to run up to them. Many times when I am on the Alta with our children, some of the children are afraid of dogs. When they scream out of fear, they are told that the dogs don't bite or that they are friendly.

Dogs should be on leash on the Alta and Oakwood Valley trails.

Thanks for your continued support to educate our community to the natural beauty in our "backyard."

Royce

Correspondence ID: 4712 **Project:** 11759 **Document:** 38106

Received:

Jun,15,2011 00:00:00

Correspondence Type:

E-mail

Correspondence:

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areas ? Adoptability concerns for SF SPCA, MHS, PHS-SPCA and Bay Area rescue organizations ? Preferred alternative is overly-restrictive and unrealistic; no technical basis for change from No Action alternative ? Solution: Modified No Action alternative, that would include New Lands (San Mateo) and management measures, including but not limited to clear signage, a robust educational program and the creation of a five-member independent recreation oversight committee.

2. Inherent NPS bias: NPS Director Jarvis' public statements about GGNRA Dog issues, GGNRA staff bias for this issue. As NPS' Western Regional Director, this is a direct quote from Mr. Jarvis as reported by Suzanne Valente and Steve Golumb when they asked Mr. Jarvis about possible City Of San Francisco reversion at Ocean Beach and Fort Funston. This conversation took place outside of the NPS Centennial-Initiative Listening Session, Presidio Officer's Club, San Francisco, Ca., March 22, 2007 "I would rather give up those [the GGNRA] properties than have dogs running loose on them." March 22, 2007 KQED Forum Show, April 7, 2011, <http://www.kqed.org/a/forum/R201104070900> 2007 GGNRAJGGNPC Intercept Survey

3. NEPA Consultation: Under NEPA, any persons, groups or organizations are encouraged to "consult" with the lead agency (GGNRA) regarding their concerns and suggestions about the DEIS. CFDG did speak with Frank Dean about having people/groups come and meet with him and GGNRA staff after the May 30th deadline and have an opportunity to explain their written comments. To date, Mr. Dean has not responded to this constructive suggestion to CFDG. CFDG Preliminary Analysis of Draft Plan/Draft EIS Draft Impact Analysis 1. Leaps of Impact ? The draft EIS impact analysis ' which in turn drives the alternatives analysis ' often makes leaps of faith based on assumptions, rather than scientific or technical data. ? The basic assumption throughout the draft EIS sections is that: the presence of dogs means impaired natural values, based on the general tendencies of dogs to root around or chase other animals. As a general matter, it's hard to take issue with a sweeping generalization like that. ? In many places, the draft EIS does not provide any data on actual impacts by dogs in areas being proposed for closure to dog walking. ? There are big consequences to thousands of people around the Bay Area for getting this wrong. ? But this is a site-specific technical planning document, where hard information about actual effects needs to be disclosed and evaluated. ? In places where data are provided, for example, there are areas where the draft EIS explains that people, as well as dogs, who traverse dune areas disturb the western snowy plovers. Monitoring surveys in an area observed 48 off leash dogs chase the plovers in 12 years. The plovers continue to return to the area each year. The draft EIS then makes undocumented assumptions that there are unacceptable impacts and that dogs, not people, are the culprits. ? There might or might not be a problem ' we can't tell from the draft EIS. If there is, we can't tell

from the draft EIS whether access should be limited for people, for dogs, or both. ? The public deserves to know these answers to be able to comment intelligently on the draft plan or be willing to accept ' for themselves or their dogs ' such severe restrictions.= access to our own public lands, and San Francisco city beaches where people have visited for decades.

2. The here and now (site specific data) A related problem with the draft EIS is that it does not address site specific conditions and resources. The draft plan and draft EIS are in some respects about 20 plans and EISs, because they examined each GGNRA area. We can appreciate how difficult this is for GGNRA and the Park Service to accomplish. ? But the courts have consistently explained that difficulty does not excuse lack of adequate data and study in an EIS. And the bulk or size of an EIS does not equate to its adequacy. ? In many places, the draft EIS lack any description of actual site specific impacts on which closure decisions are being made. In other places, the draft EIS assumes species are present in areas where there is no record of their presence. In other places, there is inconsistent information about the presence of species.

3. This isn't Yellowstone [urban] ? NEPA requires evaluation of impacts on the "human environment," defined as: Human environment shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment. 40 CFR 1508.14 ? You wouldn't know from reading the draft EIS, or at least the first roughly 1,000 pages, that much of GGNRA is located in and around the city of San Francisco. ? For example, the description of the "General Project Setting" in Chapter 3 makes passing reference to the City and County of San Francisco, nearly the entire description is about its natural resources (the Biosphere Reserve, California Floristic Province, etc.). ? The draft EIS is required to provide "full and fair discussion of significant environmental impacts." Incredible as it may seem, the draft EIS has excluded consideration of urban quality. It says: "The quality of urban areas is not a significant factor in determining a dog management plan" (draft EIS p. 22). ? This is a serious flaw, contrary to NEPA's requirements and to reality. GGNRA is located in an urban metropolitan area. The SF Charter states as a fundamental purpose: "to improve the quality of urban life." The quality and design (including trails) of open space and recreation areas are fundamental to the quality of urban life. ? The draft EIS is largely written as if San Francisco's neighborhoods and its residents don't exist. ? The legislation establishing GGNRA and the mission of the GGNRA both include preserving "recreational" values, as well as natural, scenic and cultural values. ? One would assume that a proposal that had an adverse impact on recreation ' which is part of both the human and physical environment -- would include an analysis of impacts on recreation in the project area. The draft EIS doesn't. ? The draft EIS has sections on "visitor experience" within GGNRA, which mainly treat recreation as an adverse impact on GGNRA,

rather than a value to be preserved. ? It's standard for EISs to have a section on recreation, which evaluates the on- site and off-site impacts on recreation of a proposed federal action. The draft EIS does not have a section on recreation. ? Here, it's essential, because GGNRA is San Francisco's front and back yard. It's where the people of the dense metropolitan Bay Area's neighborhoods play. This is a crucial omission in the analysis. ? This bias is then extended to the overall document, which generally puts recreation against natural values, rather than identifying and exploring a number of reasonable alternatives where they work together.

Alternatives - Draft Plan & DEIS 5. No Action is given short shrift. ? No Action means continuation of current Management Plan, not "do nothing" ? This means that ways of improving how GGNRA carries out the current 1979 Pet Policy should have been considered and wasn't given a fair evaluation. It is treated as a throwaway option ' because of the need stated by GGNRA to provide clearer rules, better compliance, and reduce potential for conflicts. We agree with those goals. ? These are problems with how the current plan is carried out, more than where access is allowed. There may be a need for some changes, but the draft EIS doesn't provide a scientific or technical basis for the severe limitations proposed. ? NEPA requires that each alternative be given substantial treatment so that reviewers can meaningfully compare them. GGNRA has more homework to do to allow a fair and objective comparison of the No Action alternative to the other alternatives. [if pressed further ' good example is use of compliance-based approach and public outreach and education so visitors know the rules and follow them ' which is what GGNRA articulates as a main reason for the dog management plan]

6. Hybrid Alternative ("C" out of 5 of course) ? If No Action is not selected, a hybrid alternative is a rational approach to balancing preservation of natural and recreational values. A draft EIS is like a mid-term exam. After all these years, it's the first time we've gotten to see something in writing. Under NEPA, the final EIS has to change to respond to comments from the owner of the Recreation Area ' which is not the National Park Service or the Interior Department -- it's the public. GGNRA's preferred alternative is called Alternative "C" ' and that's probably the mid-term grade it should receive. ? It needs more work, but it can be improved if GGNRA is open-minded and really listens and studies the thoughtful comments by the public at the recent public meetings and incorporates the public written comments. ? [if pressed further, two examples: Crissy Field beaches and grassy airfield and Fort Funston separated beach access]

7. Compliance-based Approach ? Assuming the proposed plan is improved to provide reasonable dog-walking access, the draft EIS proposes a concept that might work going forward. We're taking a close look at it, because clearly GGNRA has given some thought to it. ? It's called a "compliance-

based approach." The idea is that GGNRA will monitor how well people are following the rules. If visitors with dogs are following the rules by a landslide margin, access would continue; if not, additional restrictions would occur. ? There are significant problems that need to be ironed out with this approach. ? First, it's not clear how compliance will be measured. For example, do you average all tickets given out at all GGNRA units for a year? As another example, if you have people following the rules really well in one area (or site) of GGNRA, but not in another one, what do you do? [e.g., limit access for both, for one, etc.]. We need to know more about how this will work. We understand that the GGNRA wants to hire a private third party to develop a monitoring program and they do not want to share the development of the monitoring protocols with the public. We strongly disagree with this approach and think the creation of any monitoring protocols should involve the public in a transparent and open process. ? Second, if you've ever had a dog in your family ' or even if you haven't ' you know it's people who need to be trained: the dogs learn from their owners how to behave. A compliance-based approach works best when the people know what the rules are, so they can teach their dogs (or know they can't, and the dogs have to stay on a leash). There has to be some up-front education of park visitors about the rules as part of this compliance-based approach. This educational approach should be more than just handing out brochures to the public. ? Third, this approach will work best if there's a partnership between GGNRA, and some community and animal welfare groups, which are well suited to reach out to visitors and help with the educational part. There is a real opportunity here to build bridges and reduce federal costs for compliance.

8. Environmentally Preferred Alternative ? NEPA requires each agency to identify the alternative or alternatives that were considered to be "environmentally preferable." ? The reason is that NEPA, as our nation's most basic environmental charter, requires federal agencies ' quote "in cooperation with State and local governments and other concerned public and private organizations" ' to use "all practicable means and measures" to create and maintain conditions under which people and nature can live in "productive harmony." (what's now called sustainability) [Sec 101 of NEPA 42 USC 4331(a)] ? The national environmental policy enacted by Congress articulates what "productive harmony" and a healthy environment means, and this includes:

- o Attain the widest range of beneficial uses of the environment without adverse consequences...
- o Maintain wherever possible an environment which supports diversity and variety of individual choice...
- o Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities.... ?

Unfortunately, the draft EIS does not apply this meaning of environmental quality to its identification of the environmentally preferred alternative. ? The draft EIS takes a narrow perspective that the alternative that most preserves natural values only is the environmentally-preferred option. ?

Where you have a national recreation area whose mission is natural, recreational, scenic and cultural values in a great city ' and all of these values are part of NEPA's view of a quality environment ' the environmental-preferred alternative is the alternative that most promotes all of these core environmental values. ? We point this out because it reflects a bias in the document that systematically does not yet recognize that this plan is for an urban recreation area that needs to ' in the words of GGNRA's own mission: 'preserve natural and recreational values unimpaired.'

Correspondence ID: 4713 **Project:** 11759 **Document:** 38106

Received: May,27,2011 00:00:00

Correspondence Type: Letter

Correspondence:

Dear Superintendent Dean:

I write to offer SF Animal Care & Control's comments on the National Park Service's Draft Environmental Impact Statement for Dog Management (Plan/DEIS) for the GGNRA. As you are aware, SF/ACC is responsible for stray or unwanted domestic animals and finding them new homes, but we also provide rescue and facilitate wildlife rehabilitation for sick, injured and orphaned animals throughout San Francisco. Accordingly, we are an advocate for dogs (and off-leash exercise) as well as for other animal welfare issues including respect for and coexistence with local wildlife.

The Plan/DEIS expresses' an intention to ensure the protection of natural, cultural and recreational resources of that land. The primary supporters of the Plan/DEIS share our concerns about the impact on native wildlife. However, the Plan/DEIS lends itself to an interpretation that polarizes advocates on either side by pushing them to choose advocacy for dogs or that of natural resources. SF/ACC does not agree that a dog management plan has to invoke an either/or situation. We share the advocates' concerns about wildlife and other environmental impact. However, the EIS document presented by the NPS does not clearly demonstrate that the presence of off-leash dogs is the sole, or even primary, cause of damage to native species or wildlife. The EIS document lacks foundation or analysis about the cause of any such impact. The mere fact of off-leash dogs being present does not lead to an automatic conclusion that those dogs have impacted an area that is also frequented by people without dogs or people with dogs on leash, horses, hang gliders, the Park Service Ranger's ATVs, or other predatory wildlife.

The NPS preferred alternative with restrictions and a compliance based enforcement that could ultimately lead to an outright ban prohibiting dogs from being allowed on GGNRA property altogether does not contemplate the urban environment in which those lands sit or the interests of the people of San Francisco and the Bay Area. Moreover, this position is overly

restrictive given that the NPS has not taken any intermediate steps to educate the public and users about what is required for coexistence and collaboration. In fact, the limited education that has taken place has been initiated by local dog organizations interested in preserving their access to the off-leash areas. It seems that the NPS has not attempted to implement other, less restrictive options at their disposal prior to proposing significant limitations. For example, the NPS could implement an adaptive management plan that might include signs, timed use, fencing, and/or enforcement of local or state laws similar to our local pooper scooper law, licensing laws or permitting options. Taking such steps would indicate openness to our community's concerns and to our unique Bay Area environment.

After several meetings with you and GGNRA Director of Communications Howard Levitt, we heard and even share your concerns about visitor and employee safety, wildlife protection, and maintaining resources for future generations. We would like to continue to work with you on solutions that would allow for more flexibility in coming up with a plan that addresses the needs of San Francisco residents, both human and non-human. Peaceful coexistence requires understanding and movement from both sides and is the only way that a City like San Francisco, with such diverse interests, can seek solutions to our challenges.

Yours very truly, Rebecca Katz
